



# Public Document Pack

Arun District Council  
Civic Centre  
Maltravers Road  
Littlehampton  
West Sussex  
BN17 5LF

This meeting will be live streamed – the link to view this meeting will be available on our web pages soon

Tel: (01903 737500)  
Fax: (01903) 730442  
DX: 57406 Littlehampton  
Minicom: 01903 732765

e-mail: [committees@arun.gov.uk](mailto:committees@arun.gov.uk)

Committee Manager - Jane Fulton (Ext 37611)

20 May 2022

## PLANNING POLICY COMMITTEE

A meeting of the Planning Policy Committee will be held in **The Council Chamber, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF** on **Tuesday 7 June 2022 at 6.00 pm** and you are requested to attend.

Members: Councillors Bower (Chair), Hughes (Vice-Chair), Chapman, Coster, Edwards, Elkins, Goodheart, Jones, Lury, Thurston and Yeates.

**PLEASE NOTE:** Where public meetings are being held at the Arun Civic Centre, to best manage safe space available, members of the public are encouraged to watch the meeting online via the Council's Committee pages.

1. Where a member of the public wishes to attend the meeting or has registered a request to take part in Public Question Time, they will be invited to submit the question in advance of the meeting to be read out by an Officer, but of course can attend the meeting in person.
2. It is *recommended* that all those attending take a lateral flow test prior to the meeting.
3. Those attending the meeting will *not* be required to wear a face covering however, are encouraged to bring one along to cover instances where a meeting may have higher public attendance. Masks will be made available at the meeting.
4. We request members of the public do not attend any face to face meeting if they have Covid-19 symptoms.

Any members of the public wishing to address the Committee meeting during Public Question Time, will need to email [Committees@arun.gov.uk](mailto:Committees@arun.gov.uk) by 5.15 pm on **Thursday, 26 May 2022** in line with current Committee Meeting Procedure Rules.

It will be at the Chief Executive's/Chair's discretion if any questions received after this deadline are considered.

For further information on the items to be discussed, please contact [Committees@arun.gov.uk](mailto:Committees@arun.gov.uk)

## AGENDA

### 1. APOLOGIES

### 2. DECLARATIONS OF INTEREST

Members and Officers are invited to make any declaration of pecuniary, personal and/or prejudicial interests that they may have in relation to items on this agenda, and are reminded that they should re-declare their interest before consideration of the items or as soon as the interest becomes apparent.

Members and Officers should make their declaration by stating:

- a) the item they have the interest in
- b) whether it is a pecuniary/personal interest and/or prejudicial interest
- c) the nature of the interest

### 3. MINUTES

(Pages 1 - 8)

The Committee will be asked to approve as a correct record the Minutes of the Planning Policy Committee held on 25 January 2022, as attached.

### 4. ITEMS NOT ON THE AGENDA THAT THE CHAIR OF THE MEETING IS OF THE OPINION SHOULD BE CONSIDERED AS A MATTER OF URGENCY BY REASON OF SPECIAL CIRCUMSTANCES

### 5. PUBLIC QUESTION TIME

To receive questions from the public (for a period of up to 15 minutes).

### 6. START TIMES

The Committee is asked to approve its start times for meetings during 2022/23.

### 7. ARUN LOCAL PLAN UPDATE - SIX MONTH REVIEW

(Pages 9 - 16)

This report briefs Members on matters arising from national policy and any other matters that would inform whether a decision should be taken by the Committee to resume the Arun Local plan update or continue the current pause until 2023.

8. ARUN INFRASTRUCTURE TOPIC PAPERS - A27 JUNCTION IMPROVEMENTS; WASTEWATER CAPACITY; WATER NEUTRALITY; HOUSING MARKET ABSORPTION (Pages 17 - 32)

This report provides the Committee with a progress update on the emergent infrastructure issues affecting plan making under the 'Duty to Cooperate', collated as a topic paper to be addressed as part of preparatory work to inform Arun's Local Plan update, when it resumes.

9. ARUN HOUSING DELIVERY TEST RESULT 2021 (Pages 33 - 38)

This report briefs the Committee on the Housing Delivery Test result for November 2021 which was published by the Government on 14 January 2022.

10. ARUN LOCAL PLAN UPDATE - TOURISM HOSPITALITY AND VISITOR ECONOMY STUDY (Pages 39 - 48)

A review of Arun's visitor economy has been undertaken with the objective being to provide a review of the provision of tourism infrastructure across the Arun District planning area alongside an assessment of future demand. This includes to how the sector might grow together with the spatial implications of this growth, to support emerging planning policy in the new Local Plan.

Whilst this study has been commissioned for planning purposes, its outputs are far-reaching and need to be shared with a wider audience in order to maximise the up-take of the opportunities identified.

This report provides a summary of the study and seeks endorsement for both it and the proposed recommendations/actions that the council may wish to take forward.

11. BIODIVERSITY NET GAIN STUDY - UPDATE (Pages 49 - 66)

This report updates the Committee on the outputs of the Biodiversity Net Gain Study which will help to inform the Local Plan update (when it resumes) and, the methodology for securing Biodiversity Net Gain (BNG) through development management decisions and planning obligations.

## **OUTSIDE BODIES - FEEDBACK FROM MEETINGS**

There are no items for this meeting.

12. WORK PROGRAMME

(Pages 67 - 68)

The Committee's Work Programme for 2022/23 is attached for the Committee's information.

Note: If Members have any detailed questions, they are reminded that they need to inform the Chair and relevant Director in advance of the meeting.

Note: Filming, Photography and Recording at Council Meetings – The District Council supports the principles of openness and transparency in its decision making and permits filming, recording and the taking of photographs at its meetings that are open to the public. This meeting may therefore be recorded, filmed or broadcast by video or audio, by third parties. Arrangements for these activities should operate in accordance with guidelines agreed by the Council and as available via the following link [PART 8 - CP - Section 5 Filming Photographic Protocol](#)

# Public Document Pack Agenda Item 3

Subject to approval at the next Planning Policy Committee meeting

403

## PLANNING POLICY COMMITTEE

25 January 2022 at 6.00 pm

Present: Councillors Bower (Chair), Hughes (Vice-Chair), Chapman, Coster, Elkins, Goodheart, Lury, Yeates, Gunner (Substitute for Charles), Stanley (Substitute for Jones) and Yeates

Councillor Edwards was also in attendance for all or part of the meeting.

Apologies: Councillors Charles, Jones and Thurston

### 597. DECLARATIONS OF INTEREST

There were no Declarations of Interest made.

### 598. MINUTES

The Minutes of the previous meeting held on 30 November 2021 were approved by the Committee and signed by the Chair. The Chair noted that Minute 480 [To 'Make' the Barnham and Eastergate Neighbourhood Development Plan (Review) 2019-2031] would now not be recommended to Full Council and it had been withdrawn on legal advice as there was a challenge by Judicial Review to the Plan.

### 599. ITEMS NOT ON THE AGENDA THAT THE CHAIR OF THE MEETING IS OF THE OPINION SHOULD BE CONSIDERED AS A MATTER OF URGENCY BY REASON OF SPECIAL CIRCUMSTANCES

The Chair confirmed that there were no urgent items.

### 600. PUBLIC QUESTION TIME

The Chair confirmed that there had been no questions from the public submitted for this meeting.

### 601. COMMITTEE REVENUE AND CAPITAL BUDGETS 2022/2023

Upon the invitation of the Chair, the Interim Group Head of Corporate Support and Section 151 Officer presented the report which asked the Committee to consider and recommend its revenue budget for inclusion in the 2022/23 revenue budget, which would be submitted to the Policy and Finance Committee on 10 February 2022. Policy and Finance Committee would consider the overall revenue budget for 2022/23 to make a recommendation to Full Council on 23 February 2022 on the budget to be set and level of Council Tax for the District for 2022/23. She confirmed that the Committee did not have any capital expenditure and so did not have to consider a capital budget for inclusion in the overall capital programme

Planning Policy Committee - 25.01.22

Members then took part in a full debate on the item where a number of points were raised including:

- the restructuring of the Planning and Development Section in response to the Hannaby Report, and the need to see revenue expenditure as a KPI
- how the Committee could monitor the Planning department's performance if KPIs were not available as part of the budget process
- the Hannaby Review and its implications for Planning Policy Committee and Planning Committee, and the review reporting into the Planning Committee where more detail could be found on the process

The Interim Group Head of Corporate Support and Section 151 Officer provided Members with responses to all points raised during the debate. It was confirmed that Members had not received KPIs for this year but that Officers were looking to produce them for next year for every Committee.

The recommendations were then proposed by Councillor Gunner and seconded by Councillor Hughes.

The Committee

RESOLVED - To

- a) Agree on the 2022/23 Revenue Budget as illustrated in Appendix A of this report;
- b) Agree on the 2022/23 list of uncommitted growth items as illustrated in Appendix B of this report;

RECOMMEND TO POLICY AND FINANCE COMMITTEE

- c) That the Revenue Budget and list of growth items be included in the overall General Fund Budget when considering the overall budgets on 10 February 2022.

602. HOUSING AND ECONOMIC LAND AVAILABILITY ASSESSMENT (HELAA 2022 UPDATE)

Upon the invitation of the Chair, the Planning Policy Team Leader presented the report which explained how the Housing and Economic Land Availability Assessment (HELAA) had been reviewed and updated for 2021. The HELAA's principal purpose was to provide evidence at a high level, identifying the best performing sites with potential to consider for further assessment as part of plan making and calculating the 5-year housing land supply. It was noted that there was a reduction in deliverable sites and yields coming forward, with issues around proving how deliverable sites were in light on appeal decisions, but that figures through the Neighbourhood Planning Process were improving.

Members (and one non-Committee Member) then took part in a full debate on the item where a number of points were raised including:

- the low response to the call for sites and whether the suggested 'delivery certificate' would address the concerns with developer and promoter cooperation and commitment
- the Chair quoted from the Officer report [on page 15 of the Agenda Pack] as an important statement to put the HELAA and subsequent planning applications for projects appearing in it, into context:  
'1.9 In addition, it should be noted that:
  - Inclusion of a site in the HELAA does not mean that it will be allocated for development.
  - Planning applications on sites identified within the HELAA will continue to be determined on their merits in line with the development plan unless material considerations indicate otherwise. The HELAA may however form a material consideration in the determination of planning applications.'
- the HELAA and its relation to material considerations in determining planning applications
- Member and resident concerns over a number of sites that appeared on the list
- the need for inclusion of timescales in the HELAA (for example, when sites were put forward, what stage they were at and whether anything had subsequently changed) to give greater context to residents about why sites might have been reassessed as deliverable or otherwise
- what the 'clear evidence' consisted of, as mentioned in 1.12 of the Officer's report [on page 16 of the Agenda Pack] in relation to sites 'only be[ing] considered deliverable where there is clear evidence that housing completions will begin on site within five years', and its reliability in delivering completed building
- discussion around the criteria to change a site from 'undeliverable' to 'deliverable' and determination of yields
- whether there was a process to remove sites from HELAA

The Planning Policy Team Leader provided Members with responses to all points raised during the debate. It was confirmed that:

- the HELAA was for plan making not for decision making, but that at appeals inspectors had previously used the 'deliverable site' designation as a material consideration
- 'clear evidence' involved Officer judgement on a number of factors determining how realistic delivery timescales were including the status of the site's planning permission (detailed or outline etc) and any constraints criteria such as site ownership, ransom strips or infrastructure to be delivered
- 'made' Neighbourhood Plans being part of the Development Plan so having the same weight as the policies of the Local Plan, especially on local rather than strategic matters
- changes to deliverability status depended on the evidence the Council received each year and whether sites as they progressed became more

Planning Policy Committee - 25.01.22

policy compliant (through infrastructure developments etc). If more housing land supply was needed to be identified then HELAA sites would need to be taken and assessed through the plan making process and evidence before status changed accordingly

The recommendations were then proposed by Councillor Chapman and seconded by Councillor Hughes. By unanimous vote,

The Committee

RESOLVED

1. To consider and note the Housing and Economic Land Availability Assessment as part of the evidence base for the Local Plan and any future Development Plan Document preparation;
2. Agree the HELAA 2021 be published on the Council's website.

603. BROWNFIELD LAND REGISTER

Upon the invitation of the Chair, the Planning Policy Team Leader presented the report which provided a 2021 update to the 2020 Register. It was explained that the production of a Brownfield Land Register was a requirement under the Town & Country Planning (Brownfield Land Register) Regulations, 2017. The Register was to be established in two parts (Part 1 being sites in principle suitable for housing, and Part 2 being permissions in principle) and was to include all brownfield sites that were suitable for residential development. It was confirmed that there were 20 sites on the register (3 new sites which met the criteria had been identified for addition) and 9 sites had been removed because they had been implemented or were not available.

The recommendations were then proposed by Councillor Gunner and seconded by Councillor Hughes. By unanimous vote,

The Committee

RESOLVED - To

1. Note the 2021 Brownfield Land Register (Part 1);
2. Agree for Officers keep under review the Brownfield Land Register in order to determine whether preparation of (Part 2) including the carrying out of consultation and publicity requirements, in line with the Brownfield Land Register Regulations 2017 is justified.

604. AUTHORITY MONITORING REPORT 2020/21

Upon the invitation of the Chair, the Planning Policy Team Leader presented the report which detailed the Arun Local Planning Authority's Monitoring Report 2020/21.



This was an annual rolling report that monitored progress on plan making in retrospect, looking at the period from 1 April 2020 to the 31 March 2021. Updates to the Local Plan, Neighbourhood Plans, the Duty to Cooperate, the Housing Land Supply and the Housing Delivery Test were highlighted to Members.

Members then took part in a full debate on the item where a number of points were raised including:

- the number of unbuilt permissions, which may be Covid-related to some extent, showed the control developers had over the process
- the housing land supply and its impact on greenfield sites in the District, and the need for development to have a biodiversity net gain in light of the climate emergency
- whether the Council's assessment of housing deliverability should be more vigorous and that it was much clearer what was deliverable and what was not
- the economic uncertainty currently facing developers further complicating the situation

The recommendation was then proposed by Councillor Hughes and seconded by Councillor Elkins. By unanimous vote,

The Committee

RESOLVED

To agree the Authority Monitoring Report 2020/21 for publication on the Council's website.

605. CIL INFRASTRUCTURE INVESTMENT PLAN (IIP 2022-2024)

*(During the debate on this item, Councillor Stanley declared a Personal Interest as a Member of Bognor Regis Town Council. Councillor Goodheart also declared a Personal Interest as a Member of Bognor Regis Town Council.)*

Upon the invitation of the Chair, the Planning Policy Team Leader presented the report which sought agreement to the draft Infrastructure Investment Plan (a three-year programme for 2022-2024) which set out how Community Infrastructure Levy (CIL) funds would be prioritised for delivery of infrastructure projects. The Plan was needed as the Council was now a CIL Charging Authority (from 1 April 2020) and had begun to receive CIL receipts. It was stressed that CIL funds must be spent on infrastructure that aimed to mitigate the impacts of development upon the District, and the process for this was previously approved at Full Council. It was noted that 5 schemes ('the green list') had been identified to be included in the Infrastructure Investment Plan [on pages 33-36 of the Agenda Pack].

The Chair drew Members' attention to the fact that one of the 5 schemes [18/ADC/TI] was the subject of a petition going to Full Council on 26 January 2022. Members then took part in a full debate on the item where a number of points were raised including:

Planning Policy Committee - 25.01.22

- the lack of Bognor Regis-based schemes on the green list
- the A29 realignment and the contribution of CIL funds to the scheme
- the baseline list showing that the Council was delivering on infrastructure and the impacts of development within the District
- improvements needed to Horsemere Green Lane and its connections to a deferred planning application on Ford Airfield and its Section 106 contributions
- the likelihood of deliverability of schemes on the longer list over the period of the Plan
- the relation between where CIL was generated and where projects were funded

The Planning Policy Team Leader provided Members with responses to all points raised during the debate. It was confirmed:

- that all Town and Parish Councils were consulted and there were at least 3 consultation rounds
- all proposals were judged against the same criteria, including whether it involved policy-identified infrastructure, evidence of cost of the scheme, are there delivery partners and a funding strategy, any evidence of design and feasibility
- schemes on the green list needed to show not only infrastructure mitigating the development plan but also that they had serious chances of being funded within the 3-year period of the Plan
- there was a variable percentage of CIL funds that may be devolved to Parish and Town Councils based upon whether they had a 'made' Neighbourhood Plan or not and whether CIL liable development had taken place within the Parish
- that the IIP was comprised of the shortlist of 5 priority (green rated) projects with associated spend apportionment
- that the baseline long list be published alongside the IIP on the website for transparency

The recommendation was then proposed by Councillor Hughes and seconded by Councillor Gunner. By majority vote,

The Committee

RECOMMEND TO FULL COUNCIL

That the Arun Infrastructure Investment Plan (for the period 2022-2024) be approved and published on the Council's website.

#### 606. STATEMENT OF COMMUNITY INVOLVEMENT UPDATE

Upon the invitation of the Chair, the Planning Policy Team Leader presented the report which sought agreement on the process for ensuring the Council's Statement of Community Involvement (SCI) was up to date, following the decision of the Committee

on 6 October 2021 on its approach to plan making [Minute 338]. It was explained that the SCI was last updated via publication of the 'Immediate Review Document' in June 2020 and needed to be kept up to date as it formed evidence on legal compliance for plan making which was tested at Local Plan examination.

The recommendations were then proposed by Councillor Hughes and seconded by Councillor Lury. By unanimous vote,

The Committee

RESOLVED - To

1. Note that the use of the 'Interim Review Document' will have ceased on 31 December 2021 and unless the legislation is amended to allow for an extension of the temporary consultation measures, the SCI reverts to the SCI 2018 – 2021 published in November 2018 for plan making and Development Management purposes;
2. Agree that the SCI is currently up to date and only requires that minor typographical and clarification amendments be made and that such minor amendments can be made through officer delegated arrangements in future.

607. OUTSIDE BODIES

The Committee noted one report from Councillor Thurston on the South Downs National Park Authority.

608. WORK PROGRAMME

The Planning Policy Team Leader clarified that the Biodiversity Net Gain Study report coming to the next meeting would be a progress update report rather than a final study report due to the phased nature of the project. One Member asked for an update on the Strategic Flood Risk Assessment and an in-depth study on the multiple causes behind the Council's problems with housing delivery to be brought to future meetings; whether these would be better delivered as Member briefings was left for the Chair and Officers to determine. The Planning Policy Team Leader confirmed that work on both of these items was ongoing. The Chair confirmed that he and the Chair of Planning Committee had sent a letter to Clinical Commissioning Group (CCG) asking for an update on their plans, and as a result there was to be a presentation (date to be determined) made to Members of the Committee by the CCG on the NHS's plans for Arun.

The Committee then noted the Work Programme.

(The meeting concluded at 8.02 pm)

This page is intentionally left blank

## ARUN DISTRICT COUNCIL

### REPORT TO AND DECISION OF PLANNING POLICY COMMITTEE ON 7 JUNE 2022

**SUBJECT: Arun Local Plan Update – Six Month Review**

**REPORT AUTHOR:** Kevin Owen – Planning Policy Team Leader

**DATE:** 20 May 2022

**EXTN:** 737857

**PORTFOLIO AREA:** Planning

**EXECUTIVE SUMMARY:** This report briefs Members on matters arising from national policy and any other matters that would inform whether a decision should be taken by the Planning Policy Committee to resume the Arun Local plan update or continue the current pause until 2023.

#### **RECOMMENDATIONS:**

The Committee is asked to recommend to Full Council that:

1. The Arun Local Plan update be resumed.

#### **1. BACKGROUND:**

- 1.1 Members agreed in October 2021 (Background paper 1) to: -

##### *RECOMMEND TO FULL COUNCIL*

*Option 3 to pause the preparation of a revised Local Plan until details of the new plan making system be agreed, and that the pause be reviewed in six months' time.*

- 1.2 The decision to pause the plan was taken because of significant risks and uncertainties pending planning reforms signalled in the Planning Bill in 2021. This report, therefore, presents the 6 months review on the position and whether the pause should be reconsidered.

- 1.3 This report updates members on the position nationally and locally with respect to plan making and potential legislative and policy changes. The context for the decision to pause plan making included: -

- Slippage in the Local Plan timeable arising from not being able to agree a Vision and Objectives with which to steer the work on the Local Plan;

- Government reforms signalled in ‘Planning for the Future’ consultation (6 August 2020) were anticipated in the Planning Bill (Queens’ Speech 11 May 2021) to be voted on in Parliament summer 2021;
- A limited number of Local Plan update evidence studies had been committed which advance the Council’s climate change priorities, however, a significant number of further evidence studies to be commissioned would be put on hold to minimise the risk of abortive expenditure.

1.4 Members agreed Option 3 of the Committee Report which was to pause the preparation of a revised Local Plan until details of the new plan making system were agreed.

1.5 In the interim, a number of Topic Papers would be progressed to explore local issues that may impact on the Local Plan update, identified under the ‘Duty to Cooperate with respect to A27 transport mitigation; Wastewater Capacity; Water Neutrality; and non-strategic infrastructure (reported separately on the agenda).

### **National Planning Reforms**

1.6 In the Planning for the Future white paper, the Government recognised a number of weaknesses in the current planning system. This included the limitations around managing growth at a strategic scale, and specifically, ensuring that spatial planning decisions are aligned with infrastructure prioritisation and delivery. Although the White Paper proposed the abolition of the Duty to Cooperate (the main mechanism for managing planning across local planning authority boundaries), it did not include any fully formed alternative.

1.7 Since the initial proposals were published in the White Paper in August 2020, it has been reported in the planning and national press in early 2022 that Michael Gove, the Secretary of State for Levelling-up Housing and Communities (replacing Robert Jenrick in September 2021) stated that the government will not now proceed with the Planning Bill proposed in the Queen's Speech in May 2021. It is considered this is partly to address some of the criticisms raised through the consultation, particularly in relation to the impact some of the proposals would have on democratic accountability and on community engagement in planning

1.8 It is worth noting that after almost 1.5 years since the Planning White Paper, the Government has not yet issued its response to the consultation. However, it is understood that the role of planning is still being kept under review.

1.9 In the interim, more modest planning changes will be incorporated into the ‘Levelling-up and Regeneration Bill’ which was proposed in the ‘Levelling-up’ White Paper published earlier this year (2 February 2022). The Levelling-Up Bill will focus more on ‘overlooked families and unvalued’ communities, seeking to address regional inequalities and improving people’s prospects.

1.10 The Levelling up White Paper provides details of 12 new missions (see Appendix 1: Annex A: The 12 Missions to Level Up the UK) across four broad areas: -

1. boosting productivity and living standards by growing the private sector
2. spreading opportunities and improving public services
3. restoring a sense of community, local pride and belonging
4. empowering local leaders and communities

1.11 It commits to further consultation on the metrics used to measure the success of these missions and to creating a statutory responsibility on Government to report on their progress.

### **Reforming the Planning System in England**

1.12 Within the 305-page Levelling up White paper, there are only 4 mentions for Local Plan preparation. Page 227 states that: -

*“Only 39% of local authorities have adopted a plan within the last five years, which limits effective community engagement about development. Local plans will be made simpler and shorter, and improved data that underpins plans will ensure that they are transparent, understandable and take into account the environment that will be developed. All of this will result in a system that is easier to engage with and works more efficiently, with communities having more of a say and more councils agreeing local plans.”*

1.13 In related respects, the Levelling-Up White paper sets out a sense of ensuring natural beauty is accessible to all will be central to the planning system, with improved Green Belts around towns and cities, supported by Local Nature Recovery Strategies reflected in plan making, and woodland creation supported across the UK; with the emphasis about regenerating 20 of our towns and cities. Other proposals set out which will help to shape the emphasis and delivery of planning include: -

- Tackling poor housing quality, overcrowding and a reliance on temporary accommodation for vulnerable families which contribute to unnecessarily poor health and quality of life for many;
- Building more housing in England including more genuinely affordable social housing;
- A new drive on housing quality to make sure homes are fit for the 21st century;
- Empowering local leaders and communities through devolution across England so that by 2030, every part of England (that wants one) will have a devolution deal with a simplified, long-term funding settlement (Mission Twelve);
- Sharper and clearer accountability across the local government sector
- Strengthen transparency for local people; and
- Publish rigorous, comparable data on performance.
- A new independent body will be set up to drive this, empowering citizens, strengthening local leaders’ knowledge of their services, and increasing central government’s understanding of the sector

<b>What happens next</b>		
1.14 The Government is expected to publish the second report on how government departments are working to support; levelling up in rural areas; rural proofing in England, this spring.		
1.15 Future publications are signalled that will be setting out further detail on a number of these policy commitments. In addition, legislation will be introduced to Parliament to underpin the changes fundamental to levelling up, alongside wider planning measures.		
<b>Conclusions</b>		
1.16 Officers consider that is highly unlikely that significant scale planning reforms signalled in the Planning bill will proceed. The Levelling up White Paper signals a more modest set of proposals for improving the effectiveness, legibility and transparency of Local Plans. While the matter of planning reform is still subject to review, there will be a significant timescale to bringing back any significantly amended proposals including further consultation and response, in addition to the necessary primary and secondary legislation that would be needed. Officers, therefore, suggest that given the significant risks of not having an up-to-date Local Plan, that the Local Plan update should proceed because the risk of abortive work with radical changes to the planning system, no longer applies.		
<b>2. PROPOSAL(S):</b>		
That the local Plan update is resumed in order to ensure that the development of Arun and the impact on communities is sustainable and supported by necessary infrastructure.		
<b>3. OPTIONS:</b>		
To note the; or not to note the.		
<b>4. CONSULTATION:</b>		
Has consultation been undertaken with:	<b>YES</b>	<b>NO</b>
Relevant Town/Parish Council		x
Relevant District Ward Councillors		x
Other groups/persons (please specify) Chairman and vice Chairman of Planning Policy Committee.	x	
<b>5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)</b>	<b>YES</b>	<b>NO</b>
Financial	x	
Legal		x
Human Rights/Equality Impact Assessment		x



Community Safety including Section 17 of Crime & Disorder Act		X
Sustainability	X	
Asset Management/Property/Land		X
Technology		X
Other (please explain)		X

**6. IMPLICATIONS:**

The resumption of the Local Plan update will help to deliver sustainable patterns of development within Arun, serving local communities and will require the allocation of budgeted resources for procuring the necessary evidence base, community consultation and engagement.

**7. REASON FOR THE DECISION:**

To ensure that the development of Arun and the impact on communities, is sustainable and supported by necessary infrastructure planning and provision.

**8. BACKGROUND PAPERS:**

Background Paper 1: Item 10 Local Plan update 6 October 2021: -

<https://democracy.arun.gov.uk/ieListDocuments.aspx?CId=349&MId=1458>

## **Appendix 1: Annex A: The 12 Missions to Level Up the UK**

*1. By 2030, pay, employment and productivity will have risen in every area of the UK, with each containing a globally competitive city, with the gap between the top performing and other areas closing.*

*2. By 2030, domestic public investment in Research & Development outside the Greater South East will increase by at least 40% and at least one third over the Spending Review period, with that additional government funding seeking to leverage at least twice as much private sector investment over the long term to stimulate innovation and productivity growth.*

*3. By 2030, local public transport connectivity across the country will be significantly closer to the standards of London, with improved services, simpler fares and integrated ticketing.*

*4. By 2030, the UK will have nationwide gigabit-capable broadband and 4G coverage, with 5G coverage for the majority of the population.*

*5. By 2030, the number of primary school children achieving the expected standard in reading, writing and maths will have significantly increased. In England, this will mean 90% of children will achieve the expected standard, and the percentage of children meeting the expected standard in the worst performing areas will have increased by over a third.*

*6. By 2030, the number of people successfully completing high-quality skills training will have significantly increased in every area of the UK. In England, this will lead to 200,000 more people successfully completing high-quality skills training annually, driven by 80,000 more people completing courses in the lowest skilled areas.*

*7. By 2030, the gap in Healthy Life Expectancy (HLE) between local areas where it is highest and lowest will have narrowed, and by 2035 HLE will rise by 5 years.*

*8. By 2030, well-being will have improved in every area of the UK, with the gap between top performing and other areas closing.*

*9. By 2030, pride in place, such as people's satisfaction with their town centre and engagement in local culture and community, will have risen in every area of the UK, with the gap between the top performing and other areas closing.*

*10. By 2030, renters will have a secure path to ownership with the number of first-time buyers increasing in all areas; and the government's ambition is for the number of non-decent rented homes to have fallen by 50%, with the biggest improvements in the lowest performing areas.*

*11. By 2030, homicide, serious violence, and neighbourhood crime will have fallen, focused on the worst-affected areas.*

**12.** *By 2030, every part of England that wants one will have a devolution deal with powers at or approaching the highest level of devolution and a simplified, long-term funding settlement.*

This page is intentionally left blank

## ARUN DISTRICT COUNCIL

### REPORT TO AND DECISION OF PLANNING POLICY COMMITTEE ON 7 JUNE 2022

**SUBJECT: Arun Infrastructure Topic Papers - A27 junction Improvements; Wastewater Capacity; Water Neutrality; Housing Market Absorption**

**REPORT AUTHOR:** Kevin Owen – Planning Policy Team Leader  
**DATE:** 13 May 2022  
**EXTN:** 737857  
**PORTFOLIO AREA:** Planning

#### **EXECUTIVE SUMMARY:**

This report provides the Committee with a progress update on the emergent infrastructure issues affecting plan making under the 'Duty to Cooperate', collated as a topic paper to be addressed as part of preparatory work to inform Arun's Local Plan update, when this resumes.

#### **RECOMMENDATIONS:**

The Committee is recommended to: -

1. Consider the progress made and outstanding matters in relation to the infrastructure topics; and
2. Agree that officers continue to engage with providers on clarifying issues and to identify potential solutions via drafting Statements of Common Ground, which will support consultation responses to plan making authorities and infrastructure providers and help to identify the resources needed to ensure that necessary evidence (e.g., water neutrality) is procured to support Arun's Local Plan update (when it resumes) under the 'Duty to Cooperate'.

#### **1. BACKGROUND:**

- 1.1 The Planning Policy Committee (PPC) agreed in October 2021 (Background Paper 1) that the Arun Local Plan update be paused because of significant planning reforms signalled in the Planning Bill in 2021.
- 1.2 PPC also agreed that Topic Papers be prepared on a number of emergent infrastructure related issues identified under the 'Duty to Cooperate' with neighbouring authorities and infrastructure providers. The Topic Papers were to be worked up for inclusion in a report back to PPC within 6 months, when the matter of the Local Plan update resumption would be considered.

1.3 This report updates PPC on progress made in respect of the infrastructure subject matter of the topic papers (collated for this report for ease) to be covered which are:

- A27 junction improvements - implications of constrained capacity and viability;
- Wastewater Capacity & Water Quality;
- Water/Nutrient Neutrality;
- Non-Strategic Infrastructure;
- Housing Market Absorption Study.

#### **A27 Junction Improvements**

1.4 Chichester District Council (CDC) is preparing its Local Plan Regulation 19 Local Plan (Reg 19 LP) with a view to publication in the summer 2022.

1.5 The Regulation 18 Preferred Approach Chichester Local Plan consulted on in 2018:-

- Aimed to deliver 12,350 dwellings over 19 years (2016 - 2035) at 650 dwelling per annum (dpa)
- Included provision for 44 dpa unmet need towards South Downs Nation Park (SDNP)
- Was based on the 2018 Housing Employment Development Needs Assessment (HEDNA) which identified an Objectively Assessed Need based on the Standard Housing Methodology (SHM) of 609 dpa for the plan area (i.e., excluding SDNP) over 2016 - 2036
- Proposed distributing growth along an east - west corridor including the A259; within and around Chichester related to the A27 bypass and necessary junction mitigation; and to the south - Manhood Peninsular

1.6 To ensure a 15-year housing trajectory by the time of adoption, the Chichester Reg 19 LP will be rolled forward for the period over the 18 years 2021 - 2039. However, it is understood from Chichester officers and members, that because of evidence on significant cost and development viability constraints, delivering the full package of necessary A27 junction mitigation (including the Stockbridge southern relief road), in the Reg 19 LP is not achievable.

1.7 The Chichester Reg 19 LP may, therefore, adopt a constrained housing number significantly below the OAN but that the plan should be subject to early review on changed circumstances including the availability of Grant funding for A27 Improvements. The figures are draft and subject to change so cannot be reported here until they have been fully tested with latest emergent evidence, which is yet to be finalised and formally consulted on.

- 1.8 It is understood that the likely overall reduction in housing proposed, is more significant for the Western A259 corridor and the Manhood Peninsular, because the scale of housing is likely to be the same (or indeed there may be a marginal increase, including an additional potential employment land allocation) located around the Chichester A27 bypass Eastern corridor. This is significant for Arun because the Bognor Regis A27 junction and linked A259 corridor mutually serves the strategic developments both in Arun and in CDC in proximity, which are likely to have the most significant impact on the nearest roads and junctions serving them.
- 1.9 Under the Duty to Cooperate, Arun officers have and will continue to liaise with CDC informally and formerly on their emergent Reg 19 LP and supporting evidence. A Duty to Cooperate meeting was recently held with CDC together with the strategic highway authorities' (i.e., National Highways, West Sussex County Council) to explore the A27 junction and A259 mitigation and capacity issues. A number of questions and clarifications were requested on this matter (Appendix 1 Note of DtC Meeting). This meeting and the actions from it, will help to shape a Statement of Common Ground (ScG) with CDC on their plan preparation and also be used as the basis for Arun's own Local Plan update.
- 1.10 The key issues that Arun officers are pursuing relate to matters that may impact on the current delivery of the Arun Local Plan Strategic Allocations contributing towards the cross-boundary mitigation on the A27 as well as the basis for Arun's Local Plan update. In summary: -
- Does CDC transport modelling work looking at a constrained housing number and reduced A27 mitigation package, specifically address the cross-boundary implications for Arun?
  - Mitigation on the A259 appears to be missing from the Chichester IDP - does the transport modelling work based on the constrained housing distribution, indicate that cross boundary mitigation contributions are no longer needed on the A259 in Arun?
  - Have the Arun Strategic allocation cross boundary contributions towards the the A27 mitigations schemes been factored into the junction viability assessment? i.e., Bognor Regis Roundabout and Whyke Road Roundabout?
  - Has the scale of future growth to be planned for in Arun using the Standard Housing Methodology baseline figure (circa 8,000 dwellings) to be tested via the Local Plan update, been considered in Chichester's evidence regarding mitigation and viability assessment?

National Highways consider that the A27 capacity issues are matter for the respective Local Planning Authorities to resolve though plan making and evidence. Chichester District Council have undertaken to share evidence with Arun and to answer the queries raised via the transport modelling work at an appropriate point. Arun officers have been seeking meeting on these outcomes. However, Chichester officers do not yet appear to be in a position to respond. Therefore, a further report back to this committee will be necessary when the answers have been obtained later in the year. This will hopefully, provide a clearer picture on whether the A27 represents a significant constraint to housing growth required in any future ADC Local Plan update.

## **Wastewater Capacity 'Headroom'**

- 1.11 Southern Water has been preparing a 'Drainage and Wastewater Management Plan' (DWMP) which has included some early engagement workshops with interested partners to review supporting evidence. For example, this engagement has provided baseline data on Wastewater Treatment Work (WwTW) infrastructure capacity, flood risk and water quality status. There has also been early discussion over potential approaches to investment going forward (with respect to the three catchments in Arun; Pagham, Lidsey and Ford WwTW). Southern Water aim to undertake a formal DWMP consultation in the summer 2022 with a view to publishing the final DWMP in spring 2023.
- 1.12 On 6 October 2021, PPC considered a report on the Council's proposed draft letter response (26 October) to the early DWMP consultation. Following discussion this was agreed with further points and clarification comments from the Committee and sent to Southern Water.
- 1.13 In October 2021 Arun (Environment & Housing Services) wrote to Southern Water on the matter of storm related 'spill' via Combined Sewer Outfall (CSO) affecting Arun bathing water. Consented CSO spill plays a critical role in preventing health risks and the flooding of residential and commercial buildings. However, rapid growth in population, and the impact of climate change (e.g., increased rainfall and ground water) have added significant pressure to the sewer network and exacerbated the CSO spill issue.
- 1.14 Southern Water's response to the letter included reference to the design standards for most of the Arun sewerage system now being too small. Southern Water also referred to their DWMP work to identify the issues and investment response. Evidence showed that up to 97% of the flow in the sewers arriving at the treatment plants during a storm, tends to be rainwater. There are 2 approaches to dealing with this, upsizing the vast network (e.g., over 400km in one system) or reducing the flow into the systems.
- 1.15 The most efficient, cost effective and environmentally beneficial way to reduce/eliminate storm releases is to reduce the amount of surface water connected to the sewer system. The primary component is road/roof drainage where only a 40% reduction in flow to the combined sewer would mean that the CSOs release rate would reduce by 80%. In addition, building only water efficient housing with SuDs (and outside of the scope of planning - retrofitting of existing housing stock to be more water efficient) is also important. As part of the DWMP engagement work, Southern Water are also looking at scope for separating the flows through underground storage where feasible including expanding capacity for the systems in Arun, as part of the DWMP summer consultation and the capital investment programme Asset Management Plan (AMP).
- 1.16 The Environment Act 2021 has now brought in a new requirement for sewerage undertakers to report yearly on their achievements towards reducing storm spill discharges. Southern Water have set up a taskforce and are committed to seek ways to cut these spill incidences by 80% by 2030.



- 1.17 In November 2021 Arun officers met with Southern Water to validate the housing assumptions used in Southern Water's wastewater capacity planning. Southern Water undertake a quarterly Development Assessment to establish their capacity planning. The reported development data schedule is based on the Council's published Authority Monitoring Report, and it is shared with Southern Water asset planners to use, alongside associated population forecasts, to plan future investment in wastewater treatment / water supply. Generally, this excludes sites less than 10 dwellings as the purpose of the data is to get an idea of longer-term growth, and an additional 10% is generally allowed for smaller sites.
- 1.18 This schedule of housing developments is supplemented by a 'growth tracker spreadsheet'. The 'growth tracker spreadsheet' is used by Southern Water to log planning applications consulted on, which have been assessed as requiring a 'growth scheme', i.e., network reinforcements to accommodate the development within the existing network. This will contain any sites that have been consulted on by Arun DM officers and Southern Water's response letter, where stating that network reinforcement will be required. Sites will stay on the growth tracker until their reinforcement projects are complete.
- 1.19 Arun officers have supplemented the data on recent planning applications to ensure that Southern Water are taking account potentially accelerated housing development and yields arising within Strategic Allocations e.g., Barnham Eastergate/Westergate to calculate wastewater capacity 'headroom'. Southern Water intend to add the data to the quarterly Development Assessment April - June update and so will be able to provide an update on the WwTW 'headroom' until after that round of updates and outputs. Officers will report any outputs at the next appropriate meeting.
- 1.20 Southern Water have further clarified the fundamentals to their approach to planning WwTW capacity 'headroom'. From Southern Water's perspective, wastewater treatment capacity is not a constraint to future growth. The utility has recently published a 'Wastewater Position Statement 2022' to this effect (see Background Paper 4).
- 1.21 However, in order to ensure that all aspects of this subject have been addressed comprehensively, for example, should the Environment Agency (Southern Water's environmental regulator) identify any environmental constraints that would potentially constrain future growth, Southern Water advise Arun District Council to consider, preparing a 'Water Cycle Study' to help identify these. A Water Cycle Strategy (WCS) identifies tensions between planned growth proposals and the water related environmental standards to be maintained or enhanced through infrastructure and other actions. A WCS may provide details of water efficiency; wastewater treatment; environmental water quality; water resources; water supply; wastewater drainage; as well as the ecological constraints and opportunities relating to these aspects of the water cycle. Such a study would depend on testing the known housing and development numbers and would therefore, necessarily, only be commissioned after work to establishing the level of growth to be accommodated in the Local Plan update (when that resumes).

- 1.22 Arun officers will also continue to engage with southern Water on developing their DWMP and also set out matters in a Statement of Common Ground with Southern Water and the Environment Agency on this topic. This will help to ensure transparency on responsibilities, evidence and areas of agreement (and disagreement) or outstanding areas requiring further work, to ensure that matters are resolved early in the Local Plan update (when it resumes).

### **Nutrient Neutrality**

- 1.23 A number of plan making authorities across the UK and in areas close to Arun, (e.g. Chichester, Havant, Portsmouth) are facing difficulties in plan preparation arising from the challenge of ensuring that the impacts arising from development do not add to certain nutrient concentrations, impacting on wastewater treatment catchments which contain sensitive environmental habitats and ecosystems, that are protected by EU (Habitats Directive) and UK law (internationally important sites protected under the Conservation of Habitats and Species Regulations 2017).
- 1.24 All developments potentially impact on the level of water nutrients (e.g., housing or commercial related) through foul and grey wastewater, including surface water (e.g., in combined sewers or where there is penetration into the sewer network) which gives rise to soluble nutrients such as nitrates, phosphorus and other chemical compounds which must be treated, before water is discharged into water courses and the environment. Farming and agriculture can also have a significant impact through the use of Agri-chemicals and fertilisers and together these sources can lead to 'eutrophication' resulting for example, from algal blooms, where oxygen is depleted, seriously damaging ecosystems and aquatic plants and animals. Where protected European habitats are impacted, this is a breach of EU and UK law.
- 1.25 Natural England (NE) has previously advised 32 LPAs that, where protected sites are in unfavourable condition due to excess nutrients, development should only go ahead if it will not cause additional pollution to sites. In March 2022, Natural England advised a further 42 Local Planning Authorities that their areas are covered by this advice (Background Paper 2). Arun is not currently within this list, although is surrounded by a number of immediate neighbours.
- 1.26 The advice from Natural England means that new residential development must achieve 'nutrient neutrality'. It has had a significant negative impact on the number of homes granted planning permission in areas already affected. As a result, the Government's response has currently been to provide a funding pot, and for NE to produce clear guidance working with DEFRA (e.g., to provide nutrient calculators), as well as offering individual support for those authorities affected.
- 1.27 This issue may become relevant to Arun's Local Plan Update going forward because Arun includes part of the Marine Conservation Zone, SSSI, Ramsar and SPA designations for the Pagham Harbour shared with Chichester District and therefore, both authorities have significant existing and planned development which individually and cumulatively, may impact on Pagham Harbour designations.

1.28 While Natural England (NE) have not signalled concern with nutrient neutrality impacting on Pagham Harbour, they have signalled an intent to assess Pagham Harbour in the near future. In the interim NE have undertaken and published in the public domain an initial report to identify data gaps: -

*“The purpose of this report is to review the data available to assess the current condition of each of the qualifying features of Pagham Harbour SSSI, SPA, Ramsar, and MCZ sites, and outline any gaps in the data which make it not possible to make an assessment of their current condition. “*

1.29 NE, therefore, plan to fill the data gaps this year and complete the condition assessment next year – but are still awaiting confirmation of budgets for the work. Officers have been seeking engagement with NE on the matter of Nitrate Neutrality but have so far been unsuccessful in securing a meeting. In the interim Officers will continue to engage with NE in order to set out a Statement of Common Ground which will support the emerging Local Plan update when this is resumed.

### **Water Neutrality**

1.30 Water Neutrality is defined as development that takes place which does not increase the rate of water abstraction for drinking water supplies above existing levels – or put simply, total demand for water should be the same after new development is built, as it was before.

1.31 Water Neutrality has implications for the Development Plan policies and the determination of planning applications. Local Plan policies set out the quantity of development and its associated water efficiency through water efficiency standards set out in plan policies (which may be the same or above Building Regulations). Arun’s Local Plan Policy W DM1 ‘Water Supply and Water Quality’ sets out an efficiency standard of 110 litre /person/day. This can be achieved through developments fitting water saving spray taps, dual flush WC and other devices within dwellings, including rainwater harvesting and recycling grey water. Such measures can help to reduce the need for water abstraction and water treatment.

1.32 The need for significant water treatment mitigation and application of efficiency standards raises viability and deliverability constraints and increased potential intervention for plan making and decision making (i.e., determining planning applications).

1.33 Chichester, Horsham, Crawley and South Downs National Park authorities are affected by the Sussex North Water Resource Zone and levels of abstraction which potentially impact on sensitive receptors such as the Arun Valley Special Protection Area (SPA) and Special Area of Conservation (SAC) protected by European and UK law.

1.34 Consequently (and for other reasons), the Horsham Regulation 19 Proposed Submission Local Plan has been postponed following receipt of a ‘Position Statement’ (14 September 2021) from Natural England, the national statutory body that oversees the management of wildlife and habitats across the UK.

1.35 The 'Position Statement' (Background Paper 3) advises that development proposals, such as new homes and commercial buildings, in the Sussex North Water Supply Zone (NWZ) should not be allowed at present, unless water neutrality can be demonstrated. This is due to a potential significant impact on rare habitats in the Arun Valley, near Pulborough. Horsham District Council is unable to ensure a sound and legally compliant Local Plan until more is known about the impacts on the Arun Valley, and until a Water Neutrality Strategy for the area is developed.

1.36 Chichester District was similarly advised that for their area within the NWZ area, which is supplied by a water extraction at Hardham, it cannot with certainty, be concluded that it is not having an adverse impact on integrity on the Arun Valley SPA, SAC and Ramsar and consequently must be part of the Water Neutrality Strategy.

1.37 Water Neutrality is an issue also faced by authorities in the Hampshire sub-region because of impacts on the Solent. The Environment Agency is the water company regulator and classifies part of the wider South East region, including the eastern half of Arun District (served by Southern Water) as an area of 'Serious Water Stress'.

1.38 The Environment Agency's recently published advice: 'Environment Agency Solent and South Downs Area Water Efficiency Position Statement for Local Plans and Strategic Work' (see Background Paper 5) extract below: -

*"In line with the National Framework we advise that "Regional groups [including water companies] should:*

- *Contribute to a national ambition on average PCC of 110 l/p/d by 2050. This should be reviewed every 5 years*
- *Pursue ambitious reductions in non-household demand and contribute to the evidence available on the potential savings - as part of this regional groups should work with non-household water retailers and new appointments and variations (NAVs) to align their approaches to planning, reducing demand, forecasting and monitoring non-household water use.*

*We will support policies which include aspirational targets that go beyond this."*

1.39 The evidence in the position statement signals increased future stress arising from development and climate change. Consequently, while not currently an issue in Arun, given the need for future planning, at an appropriate time when the level of growth to be tested is known, officers will consider procuring a 'Water Cycle Study' to address water neutrality as part of the Local Plan update (when it resumes) to ensure that this issue does not become a barrier.

### **Non-Strategic Infrastructure**

1.40 The Committee raised a number of concerns at the meeting on 15 October 2021 concerning the provision of necessary infrastructure to mitigate windfall and non-strategic developments (circa developments below 300 units) coming forward. The Local Plan 2018 evidence on transport modelling and mitigation infrastructure includes specific modelling for the Strategic Allocations but for everything else to be

included in TEMPro background growth as development that would occur through applications with or without a plan in place (i.e., providing a way for accounting for windfall, and the 1,250 dwellings yet to allocated within a Non-strategic Sites Development Plan Document (NDPD) or Neighbourhood Development Plans (NDP)).

- 1.41 However, the NDPD was not progressed to resource the decision of Full Council in January 2020 to progress the Local Plan Update. The evidence base for this would have considered the allocation of non-strategic developments, any necessary site-specific mitigation and their deliverability and viability. Neighbourhood Development Plans are similarly evidenced and consulted on with infrastructure providers and tested at examination.
- 1.42 In Arun, Strategic Allocations are zero rated for Community Infrastructure Levy (CIL) and mitigate their impacts through s.106 contributions (on and off-site). Whereas non-strategic scale developments are outside of the Strategic Allocations and subject to CIL charging.
- 1.43 For CIL chargeable development therefore, CIL regulations 2019 scaled back the use of s.106 obligations to only address the need for onsite mitigation. Off-site infrastructure mitigation is funded by CIL revenue although CIL can also fund onsite infrastructure provided there is no double charging with s.106. Arun's CIL Viability Study update 2018 tested the viability of non-strategic sites (of 11 units or more where affordable housing obligations would arise) and determined that they would be able to sustain on average, a £2,000 contribution per dwelling for onsite planning obligations (not including the affordable housing contributions).
- 1.44 The acceptability of non-strategic development in planning terms should, therefore, reflect imposition of planning conditions, and use of limited onsite s.106 planning obligations (where necessary) and s.278 contributions, supported by CIL funded infrastructure. For transport and site access matters, the relevant providers e.g., West Sussex County Council or National Highways will be consulted on the application and developments must mitigate their transport impacts based on any accompanying Transport Statement (less than 50 dwellings) or Traffic Impact Assessment (80 plus dwellings). This is likely to be secured via imposition of planning conditions or s.278 highways contributions, related to access or highway improvements. Providers will object to developments if this is not the case.
- 1.45 To address members concerns about the cumulative windfall impact on strategic transport (and other forms of development mitigation) officers will continue to work with WSCC and other infrastructure providers as part of the CIL Infrastructure Investment Plan (IIP) preparation process via the joint member and officer liaison group to ensure that investment priorities and funding gaps can be addressed. In addition, the Local Plan Update will be able to commission necessary evidence on the mitigation, viability and deliverability of both strategic and non-strategic future planned development requirements. Officers will report back to this committee on these matters at appropriate opportunities.

### **Housing Market Absorption Study.**

- 1.46 A Housing Market Absorption Study has been commissioned via Icen Projects Ltd. The consultants have extensive experience in analysing housing market data across the local authority sector and private sector. The terms of the study are to test the ability of the development industry to achieve completions and sales of their housing product in Arun, compared to the adopted Local Plan 2018 housing requirement and housing trajectory. In other words, this study is testing whether, even if the Council allocates land and grants permission for a substantial number of new dwellings within a specific period, would the housing market in Arun ever be able to deliver that quantum?
- 1.47 This will be assessed by looking at housing sales performance against the trajectory and including looking at comparable areas, known emerging macro-economic factors and localised delivery barriers, in order to predict housing delivery performance to establish a realistic maximum annualised rate of housing delivery that the market is capable of delivering.
- 1.48 The outputs of the study will be reported to PPC on 27 July 2022 following a member briefing on the interim progress on 6 June 2022.

### **Conclusions**

- 1.49 Officers will continue to seek resolution on these infrastructure topics under the 'Duty to Cooperate' with infrastructure providers and adjacent plan making authorities. However, to ensure that Arun's plan making is transparent and meets national guidance, it is intended that the topic matters, where appropriate, be set out as Statements of Common Ground (ScG) with the relevant stakeholders and infrastructure providers. Under the 'Duty to cooperate' ScG must be published on the Council's web site before consultation is undertaken at Regulation 18 on a Draft Development Plan Document. This ensures that evidence and issues are identified and resolved as early as possible in the plan process (including areas of agreement or disagreement or those outstanding issues requiring further evidence and resolution). The 'Duty to Cooperate' and ScG will provide critical evidence informing the Arun Local Plan update (when this resumes).

### **3. PROPOSAL(S):**

That the emergent work for the Topic Paper subjects is used for the Duty to Cooperate and evidence base preparation on infrastructure requirements to support the Local Plan update when it resumes, to ensure that the development of Arun and the impact on communities is sustainable and supported by necessary infrastructure.

### **4. OPTIONS:**

To agree the report; or not to agree the report.

### **4. CONSULTATION:**

Has consultation been undertaken with:	<b>YES</b>	<b>NO</b>
Relevant Town/Parish Council		x

Relevant District Ward Councillors		X
Other groups/persons (please specify) Chairman and vice Chairman of Planning Policy Committee.	X	
<b>5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)</b>	<b>YES</b>	<b>NO</b>
Financial	X	
Legal		X
Human Rights/Equality Impact Assessment		X
Community Safety including Section 17 of Crime & Disorder Act		X
Sustainability	X	
Asset Management/Property/Land		X
Technology		X
Other (please explain)		X
<b>6. IMPLICATIONS:</b> The resumption of the Local Plan update will need to be supported by the technical evidence to support an appropriate level, and distribution of growth and necessary supporting infrastructure, to ensure that development is sustainable and mitigates the adverse impacts of growth.		

**7. REASON FOR THE DECISION:**

To ensure that the development of Arun and the impact on communities, is sustainable and supported by necessary infrastructure planning and provision.

**8. BACKGROUND PAPERS:**

Background paper 1: Item 10 Local Plan update 6 October 2021:-

<https://democracy.arun.gov.uk/ieListDocuments.aspx?CId=349&MId=1458>

Background Paper 2: Natural England Advice for Nutrient Neutrality:-

<https://naturalengland.blog.gov.uk/2022/03/18/creating-the-new-homes-and-the-healthy-natural-environment-we-need/>

Background Paper 3: Natural England Position Statement for Sussex Norther Water Supply Zone: -

[Position Statement](#)

Background Paper 4: Southern Water Wastewater Position Statement:-

<https://www.arun.gov.uk/duty-to-cooperate>

Background Paper 5: Environment Agency Solent and South Downs Area Water Efficiency  
Position Statement for Local Plans and Strategic Work’:-

<https://www.arun.gov.uk/duty-to-cooperate>



**Appendix 1: Duty to Cooperate: Arun District Council Chichester District Council  
Meeting with National highways and West Sussex County Council  
Cross Boundary Transport Matters.**

**Note of Meeting 31 March 2022**

**Attendees:**

<p>Arun District Council (ADC)</p> <ul style="list-style-type: none"> <li>• Karl Roberts</li> <li>• Kevin Owen</li> </ul>	<p>National Highways (NH)</p> <ul style="list-style-type: none"> <li>• Elizabeth Cleaver</li> <li>• David Bowie</li> </ul>
<p>Chichester District Council (CDC)</p> <ul style="list-style-type: none"> <li>• Tony Witty</li> <li>• John Boardman</li> </ul>	<p>West Sussex County Council (WSCC)</p> <ul style="list-style-type: none"> <li>• Darryl Hemmings</li> <li>• Tracey Flitcroft</li> </ul>

**1. Introductions/apologies: Neil Crowther and Caroline West**

**2. Purpose of the meeting – ADC**

- ADC briefly explained the meeting was part of a process for preparing the ground for Arun’s Local Plan update which is currently paused but may resume.
- The recent informal consultations on Chichester’s Local Plan review (revised housing distribution) and Infrastructure Development Plan raised a number of cross boundary issues that need to be understood both in terms of current infrastructure delivery (in particular on junctions on the A27 and on the A259) but also in terms of the basis for the Arun Local Plan update when/if it resumes.
- It is important to capture these matters within a Statement of Common Ground as part of front-loading plan making and this meeting is starting this conversation.

**3. ADC Local Plan Brief Update timescales/next steps**

- Planning Policy Committee on 7 June 2022 would be considering the matter of the pause to the Local Plan update in the light that planning reforms may no longer be a significant risk and reason not to proceed.
- Arun’s Standard Housing Methodology suggest potential 1,350 dwellings per annum (dpa - includes part for SDNP) compared to the current plan 1,000 dpa or some 8,000 additional dwellings to be accommodated in any plan update.

#### 4. CDC Local Plan Brief Update timescales/next steps

- Chichester Members will be considering a Regulation 19 Local Plan in July and are keen to progress while tackling the difficulties in A27 capacity, viability and mitigation.
- Stantec (CDC transport consultants) are testing XXX dpa including phasing/mitigation and degree of development that could be safely accommodated in advance of improvements/contributions.
- Transport modelling is still being finalised and work is anticipated imminently on outputs for the north and south of the Chichester plan area which can be shared with Arun or when these work streams are brought together – the IDP therefore, will need to further reflect this and so is not finalised.

#### 5. Transport Matters

- ADC Transport Model had included development assumptions to south and east of Chichester and A27 and similarly, the Chichester 'Preferred Approach' Local Plan Transport Model included assumptions about key developments in the West of Arun.
- ADC considered that the effect of CDC reduced housing distribution is more significant for the west and south and would therefore, be the same or marginally more significant (with additional housing and employment allocation) for the A27 Bognor Roundabout and other mutual junction dependencies south and east on A27.
- WSCC clarified that A27 Bognor Regis roundabout mitigation design for CDC was different to that for the ADC Local Plan but that the ADC design was now likely to be the template topped up by the CDC work. Similarly, the CDC Whyke roundabout signalise junction would not now happen but amended design would accommodate Pagham contribution.
- **Question:** does the Stantec modelling work justify and address the issues above (and in the Appendix 1 letter)? - and will it specifically address the cross-boundary implications for Arun?
- Mitigations and contributions are 'baked in' to both plan areas and viability assumptions with respect to the A27 although mitigation on the A259 appears to be missing from the Chichester IDP (Issues identified in the Appendix 1 ADC letter to CDC on the IDP for revised housing distribution).
- **Question:** does the CDC Transport modelling work, based on the revised housing distribution, indicate that cross boundary mitigation contributions are no longer needed on the A259 in Arun?
- **Question:** are Arun development mitigations contributions included the scheme viability work for Chichester (a set out in the Appendix 1 letter) and would that make any impact?
- WSCC considered that this would not resolve the overarching A27 mitigation/viability issue.

- **Question:** has the scale of future growth to be planned for in Arun (via the Local plan update) been considered regarding mitigation and viability?
  - WSCC clarified that the Stantec Transport Model would have only included Temprow growth factors outside of the plan area for future growth assumptions. It would be difficult to model future Arun growth without knowing where it was to be located and it would also generate its own infrastructure mitigation package
  - ADC asked specifically whether the CDC viability assessment used to justify why the required A27 works couldn't be funded by new development, had taken into account known development in Arun and then the potential for future housing growth in Arun (e.g., based on the Standard Housing Method) given the geography of constraints in Arun.
  - ADC considered that CDC justification to reduced housing numbers based on a constrained transport infrastructure capacity, would logically also apply to Arun with regard to the A27, to constrain future plan making in Arun because the A27 is critical to commuter movement in the centre and west of Arun.
  - NH would like to be kept in the loop – the Stantec work recognised that the network was over capacity – so it is down to the two plan making authorities to break the deadlock. The s.278 /s.106 contributions also allow NH a degree of flexibility with respect to the design solutions.
  - WSCC have also fed comments into CDC informal consultation with respect to sustainable transport and also the A259 corridor studies that need to feature in the CDC modelling work.
  - ADC offered that a note of the meeting would be circulated to clarify questions and actions for CDC to take back, before working up the Statements of Common Ground on the transport matters and issue and approach to ADC plan making (modelling, development viability etc).
  - CDC agreed that an ongoing DtC process on this was necessary and that diaries should be scoped – for efficiency ADC would suggest dates but also be willing to attend meetings as appropriate on CDC emergent transport evidence base.
- 
- **Action:** CDC would refer ADC's letter to Stantec to address the issues and clarifications sought by ADC in the letter.
  - **Action:** ADC would draft and circulate a note of the meeting, adding the additional points and questions arising from the discussion for CDC to put to Stantec to consider and to respond.
  - **Action:** CDC to respond to the informal consultation 'in the round' and as evidence is finalised as part of the CDC LP consultation stages
  - **Action:** ADC to set up diary requests for further meetings.

**6. AOB**

- ADC clarified will report A27 Topic Paper to next Planning Policy Committee 7 June 2022.

## ARUN DISTRICT COUNCIL

### REPORT TO AND DECISION OF PLANNING POLICY COMMITTEE ON 7 JUNE 2022

**SUBJECT: Arun Housing Delivery Test Result 2021**

**REPORT AUTHOR:** Kevin Owen, Planning Policy Team Leader

**DATE:** 20 May 2022

**EXTN:** x37857

**PORTFOLIO AREA:** Planning

#### **EXECUTIVE SUMMARY:**

This report briefs the Committee on the Housing Delivery Test result for November 2021 which was published by the Government on 14 January 2022.

#### **RECOMMENDATIONS:**

The Committee is asked to note the Housing Delivery Test result for 2021.

#### **1. BACKGROUND:**

1.1 The Committee will be aware that the Government publishes annually for all Local Authorities in England, the results of the Housing Delivery Test (HDT) metric which is the percentage measurement of the 'Total net homes delivered over a three-year period' divided by the 'Total number of homes required over a three-year period' (i.e. as set out in the Housing Delivery Test Measurement rule Book July 2018).

1.2 The three-year period is retrospective and corresponds to the three years prior to and including, the last housing monitoring period reported. Each published HDT result that falls in the relevant monitoring year, is added to the history of results reported in Arun's Authority Monitoring Report (AMR).

1.3 The HDT results, reported annually for Arun since the HDT was established in 2018, are as follows: -

- 91% November 2018
- 68% November 2019
- 61% November 2020
- 65% November 2021 (published January 2022)

1.4 The Government published a number of penalty thresholds set out within the National Planning Policy Framework (NPPF) that must be applied with respect to the HDT result:-

- Where housing delivery falls below 95% of requirements an 'Action Plan' should be published;
- Where housing delivery falls below 85% of the requirement, a 20% buffer should be applied to the five-year housing land requirement;
- Where housing delivery falls below 75% - The 'Presumption in favour of sustainable development' applies to decision making (i.e. for determining planning applications).

- 1.5 The Council published an Action Plan 2019 which has been updated and will continue to be updated until the 95% threshold is attained. The Action Plan set out actions which included for example, the adoption of Masterplans to address coordination of applications and improved quality of development proposals. This has been undertaken for the Strategic Allocations. In addition, a 'call for sites' culminated in the Councils' published Interim Housing Statement 2021 being approved in March 2021 to encourage housing land supply to come forward in sustainable locations. In addition, to help boost housing delivery performance, officers have commissioned a consultant to work with developers to commit to Housing Delivery Agreements on sites with outstanding planning permissions.
- 1.6 The HDT 2019 result also triggered a 20% buffer for calculating the 5-year HLS although the earlier HDT result for 2018 triggered a 5% buffer.
- 1.7 Subsequent HDT results including the current HDT result published for 2021 have all triggered the 20% buffer.
- 1.8 It is worth noting that the adopted Arun Local Plan 2018 applied a 20% buffer for calculating the 5-year land supply based on the 2016/17 Authority Monitoring Report because of persistent housing under delivery (see paragraph 12.1.5 of the Adopted Arun Local Plan 2018).
- 1.9 The 'presumption in favour of sustainable development' (i.e., paragraph 11d of the NPPF) is also triggered when an authority is unable to demonstrate a 5-year HLS. This has been applicable in Arun since 2019 when the NPPF protection for recently adopted Local Plan's ceased to apply for Arun as reported in the annual publication of the Council's AMR.

### **Conclusions**

- 1.10 While it appears that there is a modest improvement in the HDT result in 2021 this is, largely explained because of a technical adjustment to allow for the impact of Covid\_19 on the housing sector (i.e., the housing requirement period was reduced to 8 months and completions delivery period to 11 months in 2021).
- 1.11 There are no additional penalties for Arun as a result of the published 2021 HDT result, and these remain as; an Action Plan; application of a 20% buffer and the 'presumption'.

<b>1. PROPOSAL(S):</b>		
That the Housing Delivery Test result and its implications for decision making in Arun, is considered.		
<b>2. OPTIONS:</b>		
To note the HDT result; or not to note the HDT result.		
<b>4. CONSULTATION:</b>		
Has consultation been undertaken with:	<b>YES</b>	<b>NO</b>
Relevant Town/Parish Council		x
Relevant District Ward Councillors		x
Other groups/persons (please specify) Chairman and vice Chairman of Planning Policy Committee.	x	
<b>5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)</b>	<b>YES</b>	<b>NO</b>
Financial		x
Legal		x
Human Rights/Equality Impact Assessment		x
Community Safety including Section 17 of Crime & Disorder Act		x
Sustainability		x
Asset Management/Property/Land		x
Technology		x
Other (please explain)		x
<b>6. IMPLICATIONS:</b>		
The HDT result measures a Council's past 3-year housing delivery performance and is used by the Government to determine whether penalties should be applied to decision making and calculation of housing land supply (HLS), for the purposes of the 5-year HLS.		
<b>7. REASON FOR THE DECISION:</b>		
To ensure that housing delivery and performance is monitored in Arun in order to inform whether intervention improvements can be made to help boost the delivery of housing.		

**8. BACKGROUND PAPERS:**

Background Paper 1 Housing Delivery Test Measurement November 2021:-

[www.gov.uk/government/publications/housing-delivery-test-2021-measurement](http://www.gov.uk/government/publications/housing-delivery-test-2021-measurement)





This page is intentionally left blank

## ARUN DISTRICT COUNCIL

### REPORT TO AND DECISION OF PLANNING POLICY COMMITTEE ON 7 JUNE 2021

**SUBJECT:** Arun Local Plan Update – Tourism Hospitality & Visitor Economy Study

**REPORT AUTHOR:** Kevin Owen – Planning Policy Team Leader  
**DATE:** 20 May 2022  
**EXTN:** x 37853  
**PORTFOLIO AREA:** Planning

#### **EXECUTIVE SUMMARY:**

A review of Arun’s visitor economy has been undertaken with the objective being to provide a review of the provision of tourism infrastructure across the Arun District planning area alongside an assessment of future demand. This includes to how the sector might grow together with the spatial implications of this growth, to support emerging planning policy in the new Local Plan.

Whilst this study has been commissioned for planning purposes, its outputs are far-reaching and need to be shared with a wider audience in order to maximise the up-take of the opportunities identified.

This report provides a summary of the study and seeks endorsement for both it and the proposed recommendations/actions that the council may wish to take forward.

#### **RECOMMENDATIONS:**

That the Committee agrees the following: -

1. The Tourism Hospitality & Visitor Economy Study forms part of the evidence base for the Local Plan Update and is published on the Council’s evidence web pages;
2. That the Council takes ‘pro active’ approach (as set out in section 1.7 bullet 4) to bring forward tourist accommodation development through working with stakeholders to identify suitable sites opportunities, including examining the Council’s own estate;
3. The Council supports the future provision of a new large scale holiday site either through an allocation in the Local Plan Update, or through the use of an appropriately worded policy;
4. The Council will support policies within the Local Plan update that encourage the forms and range of hotel and visitor accommodation identified under section 1.10 of this report; and

5. The Study be referred to the Economy Committee to consider and agree appropriate economic recommendations.

**1. BACKGROUND:**

1.1 A review of Arun’s visitor economy has been undertaken with the objective being to provide a review of the provision of tourism infrastructure across the Arun District planning area, alongside an assessment of future demand, and from this to identify how the sector might grow together with the spatial implications of this growth, to support emerging planning policy in the new Local Plan.

1.2 The approach to the study has involved an initial analysis of current demand and supply as a baseline, followed by an assessment of future demand through identifying drivers to growth locally, trends in the market nationally, and the ambitions for expansion and new development from existing operators, as well as those looking to be represented in the study area. Information was identified from a number of sources including engagement and consultation across public and private sectors.

1.3 Tourism is identified within the study as being an important sector of Arun’s economy, making a significant contribution to employment and spending in the area. It is identified that Arun has 4m visitors, which amounts to £221m of direct spend and supporting 4,360 FTE jobs. Staying visitors contribute much more of this spend (£116m from 0.61m staying visitors) compared to £105m from 3.43m day visitors. Two thirds of staying visitors are on holiday, and a further third are visiting friends and relatives. Business tourism represents only 5% of staying visitors. The study also identifies that there is a very seasonal market.

**1.4 Key Points of the Study**

1.5 A number of key points have been identified by the study, including the following:

- Overcoming seasonality through broadening markets and products, and focusing on longer stays (particularly staying visitors), provides an opportunity to further boost the contribution this sector makes and the benefits it brings.
- Arun has no clear brand proposition, with a diverse offer focused around heritage, traditional seaside holidays, nature and outdoor activities giving it potential for broad appeal that can be enhanced by working with linked offers Sussex-wide.
- Whilst there is a significant supply of visitor economy infrastructure (239 accommodation establishments offering over 16,000 bedspaces, and 344 other visitor economy linked businesses), there are signs of a need for quality improvement in some of the supply.
- There are indications of gaps in supply with shortages of accommodation being widely felt amongst stakeholders, particularly in the peak season. This includes both basic branded stock such as budget hotels, but also more innovative offers such as glamping, eco lodges and accommodation with a ‘wow’ factor.
- Similarly, gaps were also identified in terms of a more diverse food and drink offer, walking and cycling infrastructure, as well as other outdoor activities such as water sports (areas of growth in the market that Arun could benefit from).

- There are clear opportunities for the sector to attract new markets, and there are ambitions within the sector to grow, and to expand the offer physically, from the addition of serviced and non-serviced accommodation to existing accommodation sites and attractions, to new cafes, bars and artisan food offers, and more facilities for outdoor activity markets.
- Wider destination development remains an important backcloth to what the private sector may deliver, so the regeneration work of the Council, the focus on public realm, the seafront, transport improvements and other infrastructure remain critically important to set the scene for investment.
- There is a distinct sustainability thread to emerging Council policy that chimes well with where the market is moving, and the visitor economy can reflect eco-friendly principles in the design of visitor accommodation which if sufficiently innovative can be a draw to the market itself.
- Arun's visitor economy sector seems to be bouncing back from Covid, with market and product development trends (many of which have been accelerated by Covid), presenting opportunities to attract new markets and diversify the area's product offer whilst reducing seasonality through broadening market appeal.
- It is positive to note that the report identified that there are strong levels of potential interest from national hotel and visitor accommodation developers, operators and brand owners in being represented in Arun, some of which could deliver developments of scale with significant economic benefits.
- The main obstacles to bringing development forward are identified as funding, planning and site availability. Therefore, a positive planning framework and the availability and deliverability of suitable sites are key to securing their investment.
- The Council has adopted a new Vision which includes a focus on developing Arun as a key tourist destination, encouraging the development of more visitor accommodation to secure more staying visits and associated economic benefit. There are some major regeneration projects happening that present opportunities to improve the infrastructure and environment of Arun as a destination as well as presenting opportunities to deliver new hotels and visitor accommodation.
- There is a need for an updated and refreshed visitor economy strategy or Destination Management Plan for Arun. This strategy should help and direct the sector to move forward in an integrated way, with clear target markets and a product development strategy and action plan to meet the needs of these target markets. An accommodation development-led strategy would ensure Arun gains maximum benefit from the opportunity for growth in visitor activity and captures associated spend. A sustainability focus to this strategy would also help deliver some of the Council's wider objectives around climate change.

### **Recommended Actions of the Study**

- 1.6 The report proposes several actions for the Council to consider, the most important one is for the Council (as a whole, with various department working collectively) to firm up its position on the role it might play in responding to the opportunities identified – from 'laissez-faire' to a more pro-active and planned approach, to help secure delivery.
- 1.7 The following actions are recommended for both the Planning and Economic Regeneration Departments:

- Improving the text supporting the Local Plan tourism policy, related to the sense of the market opportunities identified in this study and the sorts of development that the Council would like to see based on this evidence (see study paragraph 6.1.4), including emphasising and developing the sustainable tourism product (e.g. green design). Such improvements can be made when the Council resumes the review of the Local Plan.
- Consider allocating one or more sites for larger scale visitor accommodation development, such as a holiday lodge park. The allocation of one or more sites may be considered as part of the review of the Local Plan, with further evidence prepared to support such an approach if required. This element will also require an ongoing dialogue with potential operators.
- Produce or commission a refreshed 'Visitor Economy Strategy' or 'Destination Management Plan'. This work may be progressed in the coming year by Regeneration and Economic Development Officers.
- Take a more 'hands on' (pro-active) approach to steering, directing and bringing forward development, working closely with interested developers and helping to identify suitable sites with planning potential, including those owned by the Council and key stakeholders such as the County Council. The soft market testing undertaken as part of this study has essentially 'warmed up' interest from national hotel and visitor accommodation developers and operators, in being represented in Arun. It is recommended that the Council should take advantage of this and take a pro-active role in furthering this interest. Whilst this would require input from a number of departments across the Council including regeneration, planning policy, Development Management (DM), Estates etc. it could help to deliver major regeneration schemes. Such an approach would help the Council to deliver its vision, especially the theme of 'Fulfilling Arun's economic potential'. The main aim related to this theme being to 'Encourage the development of the district as a key tourist destination, supporting and enabling improvements and activities to increase visitor spend'. It is therefore, recommended that this approach and proposed actions be followed by all those departments identified.
- The Council could decide to be an active partner in delivering visitor accommodation. There could be scope for the Council to partner with one or more developer/operators that has expressed interest – through contributing land to a joint venture, or potentially to be the investor in a scheme. The study has found examples of local authorities also beginning to invest in other forms of accommodation – Bournemouth Christchurch & Poole have developed beach huts with sleeping accommodation and are apparently about to develop some beachfront apartments and a restaurant. In doing so they are generating an income from the asset but also helping develop the destination's infrastructure in key locations.
- Continue to invest in public realm, the seafront, and in key infrastructure that can help create the right climate for investment by private sector accommodation developers, but also support them, for example the proposed cycle route between Littlehampton and Arundel. This action is already being extensively undertaken by Economic Regeneration Officers, as currently evidence through the extensive works underway in Littlehampton.

## **Recommended Planning Approach**

- 1.8 Whilst it is positive to note that the study makes a number of recommendations that the council could take with regard to tourist and visitor accommodation, it should also be noted that the main obstacles to bringing development forward are identified as funding, planning and site availability. Therefore, a positive planning framework and the availability of suitable sites are identified as being key to securing their investment.
- 1.9 Whilst the main recommendations for further action are largely related to Economic Regeneration (with input from other departments) – see bullet points 3 - 6 of paragraph 1.7 above, it is clear that the issue of additional tourist accommodation requires further consideration from a planning perspective.
- 1.10 The study identifies that there is a strong interest from accommodation providers in providing new and/or improved accommodation provision within the district. Any such development would help attract a broader range of visitors thereby enhancing the district's overall appeal and competitiveness. It is recommended that the Council take advantage of the interest generated through the production of this study to work closely with relevant hotel and tourist accommodation providers to assist in the development of further accommodation. In particular, having reviewed the national and local picture of demand, and advised by providers operating within Arun, it is likely that:-

### **Hotels**

- There is interest for a hotel accommodation in Bognor Regis 60 – 150 rooms;
- There is interest for a hotel accommodation in Littlehampton 60 – 100 rooms;
- There is interest for a hotel accommodation in Arundel 80 – 150 rooms;

### **Budget hotels**

- There is interest for a budget hotel in Bognor Regis which has 80 rooms; and
- There is interest for a budget hotel in Littlehampton that has 60-80 rooms;

### **Boutique Hotels**

- There is interest for a small boutique or country house hotel in Arun that has 30-40 rooms;
- There is interest for an aparthotel (i.e. serviced apartment complex) in Arun that has 60-70 rooms;

### **Leisure Hotels**

- There is interest for Walking/cycling Hotel that has 70+ rooms;
- There is interest for Pub accommodation that has 30+ rooms;

### **Caravan and Camping**

- There is interest for 120 pitch caravan/motorhome pitches/20 pod/lodges site in Bognor Regis and Littlehampton;

### **Eco-sustainable Wellness niche**

- There is interest for Sustainable eco-lodge and nature-based resorts – eco-cabin 6-8 units including smaller 10- 40 units and larger 100-200 units;
- There is interest for treehouse resort 7-10 units and wellness resort 20-30 units;

### **Lodge style development**

- There is interest for at least a lodge style development of 120-200 units in Bognor Regis with leisure facilities or 40-50 lodges without leisure facilities;
- There is also interest for at least a lodge style development of 120-200 units in Littlehampton with leisure facilities or 40-50 lodges without leisure facilities.

A more detailed table is provided in section 6.2 of the study.

- 1.11 It is also clear that based on the development interest identified in the study that the Council should consider allocating one or more sites for larger scale visitor accommodation development, such as a holiday lodge park through its Local Plan update. However, it should be noted that the study does not specifically identify sites worthy of allocation or further consideration as the intention was to focus on identifying potential future opportunities for visitor accommodation development in the district based on the range of information including feedback from stakeholders and tourism sector consultees and evidence from previous studies and strategies on current shortages of visitor accommodation. The findings combine to give conclusions on the likely future market opportunities for and operator and developer interest in hotel and visitor accommodation development in Arun, as opposed to potential sites.
- 1.12 Therefore the issue of potentially allocating a site for tourist accommodation would have to be subject to further dialogue with the relevant companies (who would need to prove confirmation of their continued interest in providing such a site in the LPAA), along with further work to understand the suitability and availability of suitable land to accommodate such a use. If these issues can be adequately dealt with, it is suggested that the Council make provision for such a site in the Local Plan update.
- 1.13 If the Committee is supportive, the Local Plan update should consider how best to identify an appropriate site for larger scale visitor accommodation development. There are two options for doing this:
- Option 1: Allocate sites for new tourist accommodation
  - Option 2: Produce an updated policy which would be supportive of a new site for tourist accommodation
- Option 1: Allocate a site for new tourist accommodation
- 1.14 The first option is for a specific site to be allocated within the Local Plan Update. Allocating a site would mean specifically identifying a parcel of land where new tourist accommodation would be permitted. This would require a specific area to be identified on the policies map and a new policy prepared. This policy would be similar to those currently prepared for both the housing and employment allocations in the Arun Local Plan 2018.



1.15 Whilst such an approach is a positive one in that it provides certainty for both a accommodation provider, there would have to be certainty that the allocation would be delivered, that it would be viable, and that all of the associated infrastructure had been considered, assessed and dealt with i.e. water, sewerage, transport etc. As a result, this option would require further work by officers working with the relevant accommodation providers as well as key stakeholders. Further evidence will also have to be prepared to support such an approach, which would have cost implications for the Council. Furthermore, this approach would mean that new tourist accommodation could only be built in the identified locations, and would not be permissible in other locations (as it would be contrary to the development plan).

Option 2: Produce an updated policy which would be supportive of a new site for tourist accommodation

1.16 The alternative option is to produce an updated tourist policy as part of the Local Plan Update. This could be in the form of a criteria-based policy which would identify a set of criteria whereby new larger scale tourist accommodation could be acceptable.

1.17 Whilst this could provide a more flexible approach that would allow new tourist accommodation to come forward in any location within the LPAA, given the right circumstances, it should be noted that the existing policy is already considered to be positively written in terms of allowing development in the countryside by the consultant who prepared this study.

**Conclusions**

1.18 Whilst this study has been commissioned for planning purposes, its outputs are much more far-reaching and involve a wider audience in order to maximise up-take of the opportunities identified.

1.19 Overall, this review has a very positive story to tell of opportunity for visitor economy sector growth, the attraction of a broader market and the development of a diversified offer, all of which with the right frameworks in place can play an important part in helping deliver the Council's vision for Arun going forward.

1.20 The Committee should conclude whether, based on the recommendation of the study on the overall approach, the Council would support the provision of a new large scale holiday site in the district.

**2. PROPOSAL(S):**

That the Tourism Hospitality & Visitor Economy Study forms part of the evidence base for the Local Plan update and is published on the Council's evidence web pages.

**3. OPTIONS:**

The following options are available to Members:

1. To accept the recommendations;
2. Not to accept the recommendations.

<b>4. CONSULTATION:</b>		
Has consultation been undertaken with:	<b>YES</b>	<b>NO</b>
Relevant Town/Parish Council		x
Relevant District Ward Councillors		x
Other groups/persons (please specify)		x
<b>5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)</b>	<b>YES</b>	<b>NO</b>
Financial	x	
Legal	x	
Human Rights/Equality Impact Assessment		x
Community Safety including Section 17 of Crime & Disorder Act		x
Sustainability	x	
Asset Management/Property/Land		x
Technology		x
Other (please explain)		x
<b>6. IMPLICATIONS:</b>		
<p>The commissioning of evidence to support the Local Plan update will help to deliver a 'sound' Local Plan which will aid local decision making and ensure that development is sustainable and meets the Council's aspirations, including securing the steps necessary to address the Climate Change Emergency and promote the economy of the district. The commissioning of evidence has a financial impact on the authority however, this has been budgeted for.</p>		

**7. REASON FOR THE DECISION:**

The report is to keep the Committee informed on the progress on commissioning work to support the update of the Arun Local Plan 2018 and to understand the approach to identifying provision for hotel and visitor accommodation needs as well as a suitable site for a larger tourist accommodation development.

**8. BACKGROUND PAPERS:**

Background paper 1: Tourism Hospitality & Visitor Economy Study  
[Leisure, recreation and culture - planning policy | Arun District Council](#)



This page is intentionally left blank

## ARUN DISTRICT COUNCIL

### REPORT TO AND DECISION OF PLANNING POLICY COMMITTEE ON 7 JUNE 2022

**SUBJECT: Biodiversity Net Gain Study - Update**

**REPORT AUTHOR:** Kevin Owen – Planning Policy Team Leader  
**DATE:** 20 May 2022  
**EXTN:** x 37853  
**PORTFOLIO AREA:** Planning

#### **EXECUTIVE SUMMARY:**

This report updates the Committee on the outputs of the Biodiversity Net Gain Study which will help to inform the Local Plan update (when it resumes) and, the methodology for securing Biodiversity Net Gain (BNG) through development management decisions and planning obligations.

#### **RECOMMENDATIONS:**

It is recommended that the Committee agrees: -

1. That the key recommendations and actions of the Biodiversity Net Gain (BNG) Study are supported and addressed through the Local Plan update (when it resumes);
2. In particular, the use of the existing nine Biodiversity Opportunity Areas (BOA) as a key focus for nature recovery and expansion, including the use of wildlife corridors and islands of biodiversity (paragraph 1.16 - 1.22 of this report) to link habitats and species;
3. Setting additional 'Core Areas' with High Value and 'Opportunity Areas' with medium Value;
4. Creation of Marine BOAs on suitable marine habitat along Arun's coast, to help conserve and enhance Kelp Forest, Sea grasses etc. (paragraph 1.21); and
5. Working with the South Downs National Park authority to encourage the creation of a new 'Bechstein's Bat Corridor' across the north west corner of the District, including partly within and abutting the Arun local planning authority area; serving Singleton and Cocking tunnels; running to Tortington Common via Fontwell, Rewell Wood and Binsted Valley (paragraph 1.22);
6. That the study is published on the council's web site as evidence supporting the Local Plan Update, when that is resumed and

The Committee is also asked to recommend to Full Council that:

7. The proposed approach to Biodiversity Net Gain that is required through Policy ENV DM5 of the Arun Local Plan shall be the use of the 10% Biodiversity Net Gain metric under the Environment Act 2021 as set out in Box 3.3, page 33, of the Biodiversity Net Gain Study. An explanatory statement will be published on the council's web site.

## 1. BACKGROUND:

1.1 The context for the commissioning of the Biodiversity Net Gain (BNG) study is summarised in relation to: -

- The Council's declared 'Climate Change Emergency' (Background paper 6) and net zero carbon aspiration (15 January 2020) including the decision to update the adopted Arun Local Plan 2018 biodiversity and energy policies (currently paused);
- 'National Planning Policy Framework' 2021: *'plans should promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains in biodiversity'* (para 179b);
- 'Environment Act' December 2021; sets out a duty on local authorities to publish biodiversity reports and to secure mandatory biodiversity net gain via applications from autumn 2023.

1.2 Protecting and enhancing biodiversity and habitats to mitigate the loss arising from built development or adverse impacts of climate change (e.g., extreme weather events including rainfall, flooding or drought and heating) can also play a role in carbon reduction through carbon capture. This is recognized in the Arun 'Carbon Neutral Strategy' 2022-2030 which seeks the: -

*'review planning policy to ensure that the Council is supporting and encouraging rewilding, nature-based solutions, and implementation of biodiversity improvements within the district'.*

1.3 The Arun Biodiversity Net Gain (BNG) Study was therefore, commissioned to establish a robust evidence base for the Local Plan update and, how the following biodiversity policies may be updated in relation to Biodiversity Net Gain: -

- Policy ENV DM3 'Biodiversity Opportunity Areas'
- Policy ENV DM5 'Development and Biodiversity' and
- Policy W DM4 'Coastal Protection'.

- 1.4 It should be noted therefore, that the adopted Arun Local Plan policy ENV DM5 already requires developments to seek to achieve a biodiversity net gain and to protect existing habitats on site, well before the Environment Bill was published and its eventual enactment.
- 1.5 Because the natural world and distribution of habitats and species does not conform to administrative boundaries, the scope of the BNG study necessarily looks at the wider hinterland around Arun District which includes parts of the South Downs National Park (SDNP) to ensure that wildlife corridors and cross boundary habitats are identified and considered by any updated policies and implementation within the Arun Local Planning Authority area (which excludes the SDNP). This will help to ensure that any cross-boundary matters can then be coordinated with adjacent plan making authorities, including Chichester, Worthing and West Sussex County Council.
- 1.6 The 'Environment Act' sets out use of the 'DEFRA biodiversity metric<sup>1</sup>' to be used for securing Biodiversity Net Gain (a 10-percentage quota) on site and application of a 'local levy' and national credit scheme applicable to anything delivered off-site through either s106 or conservation covenants, to be applied for a period of 30 years. The principle of Biodiversity Net Gain means that where proposed developments have a material impact on biodiversity – e.g., plants and animal species, the development proposals should ensure that there is no net loss and must deliver a net gain on the baseline natural asset. Where this is not feasible on site – off site contributions will be necessary. Off-site contributions will need to be delivered through application of the 'local levy' and/or the through the buying of nationally registered biodiversity credits.

### **Methodology**

- 1.7 The BNG study will establish the baseline habitat and species evidence that is needed to inform the updating of the existing biodiversity policies as part of any Local Plan review and to inform future work on implementation of any 'local levy' in line with the Environment Act. This requires the collation, mapping and review of the stock of habitat and species records and data sets held by the statutory and specialist environmental bodies and wildlife partnerships operating across Arun District, including the Sussex Biodiversity Records Centre (SxBRC) and Natural England. Particular attention is also given to the existing defined Biodiversity Opportunity Areas (BOA), which have been recognised to have characteristics suitable for habitat creation and restoration, identified on the Policies Map of the adopted Arun Local Plan 2018. The key study outputs include: -
- Identifying those areas where there are known high presence of Protected and Notable species (Species of Principal Importance for Conservation in England listed on Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006) and Sussex Biodiversity Action Plan (BAP) Priority Species.

---

<sup>1</sup> Biodiversity version 3.0 was published in July 2021, although it is intended that it will be continuously updated with the first, along with supporting documents, published on 21.4.22, which can be seen at [The Biodiversity Metric 3.1 - JP039 \(nepubprod.appspot.com\)](https://www.nepubprod.appspot.com). The metric uses habitats to give a biodiversity value but does not require or use species information.

- Analysing whether the existing Biodiversity Opportunity Areas (BOAs) remain the most suitable defined areas of the landscape for the creation of new habitats.
- Identifying supporting delivery opportunities justified with evidence, for securing the objectives of the existing Biodiversity Opportunity Areas, including any necessary boundary expansion or adjustment to help implementation of any biodiversity credit scheme.
- Identifying recommended actions and/or approaches supported by evidence, that would be suitable for refining Local Plan policies for the protection and enhancement of those biodiversity assets and specifically for assessing and securing the net gains in biodiversity through planning applications and conditions.
- Ensuring that the above include the marine environment in terms of its existing value and whether incorporation of any specific projects would be suitable, particularly regarding delivering other Council aims, such as net zero carbon.
- The role of soils in biodiversity and sustainable farming practices.

1.8 The BNG study (Background Paper 5) is comprised of four main parts with the following two report stages: -

**a. Interim Report**

- Stage 1 – Species related collation and analysis
- Stage 2 – Habitat related mapping and review

**b. Final Report**

- Stage 3 – Delivery and Implementation
- Stage 4 – Recommendations

**Interim Report (Stage 1 and 2)**

1.9 The Interim Report sets out the methodology, analysis, and interim findings from the first two stages of the BNG study and helps set the ‘direction of travel’ for how the Council can deliver BNG through the planning system. The focus of the first stage was to compile the baseline evidence discussing: -

- The existing natural assets related to species and habitats of the district (including plants, vertebrates (e.g. birds, bats, mammals, reptiles, aquatic species) and invertebrates (e.g. insects etc.);
- The protected and notable species within the district, along with their spatial spread and extent (including statutory, European, national and locally protected designations);
- The habitat types focussing on their spatial spread across the district (including wetland and coastal);
- The existing Biodiversity Opportunity Area (BOA) and whether their boundaries remain appropriate; and
- Early identification of opportunities for enhancement and creation of species corridors.

1.10 The final list of species identified include the following:-



- All rare species of bats such as those listed on Annexe II of the Habitats Directive;
- All breeding birds listed in Schedule 1 of the Wildlife and Countryside Act 1981, along with key Priority Species which occur in the district (grey partridge, corn bunting, nightjars, tree sparrows);
- All rare wintering bird species such as Annex 1 Birds which are the qualifying feature of the Pagham Harbour SPA; and
- All remaining Priority Species.

1.11 The key designated (statutory and locally protected) habitat mapping is listed below:-

- Special Protected Areas (SPAs)
- Special Areas of Conservation (SACs)
- Marine Conservation Zones (MCZs)
- Sites of Special Scientific Interest (SSSIs)
- Local Nature Reserves (LNRs)
- Sites of Nature Conservation Importance (SNCl)s<sup>2</sup>
- Marine SNCl)s
- Pagham Harbour Buffers A and B
- Local Geological Sites (LGSs)
- Local Wildlife Sites (LWS), formerly known as SNCl)s<sup>3</sup>
- Priority Habitats
- Biodiversity Opportunity Areas (BOAs)
- Designated Road Verges

1.12 The above relate and also contain some relevant terrestrial, freshwater and marine 'Priority Habitats'.

1.13 The data and mapping have been reviewed to identify areas within the district where clusters of notable habitats and species are located. The location of these clusters have been compared with the location of the following Sussex BOAs identified on the Local Plan Policies Map:-

- Chichester Coastal Plain;
- Western Escarpment;
- Climping to Houghton;
- Arundel Park;
- Houghton to Coldwaltham;
- Clapham to Burpham Downs;
- Central Downs – Arun to Adur;
- North-east Worthing Downs; and
- Lidsey Rife.

<sup>2</sup> See LWS below

<sup>3</sup>Name changed when SxBRC took over managing scheme on behalf of WSCC in 2018

1.14 While the robustness of the data was generally excellent – in some instances the data and mapping work required some rationalisation and interpolation of time series records including point and tile plotting. This is because of the large volume, low resolution and age of some species and habitat data sets - or because of gaps and limitations in the data.

1.15 However, the cross analysis of species and habitats data suggested the following:-

- The two most abundant habitats in the District are Deciduous Woodland (primarily in the north of the district within the SDNP) and Coastal and Floodplain Grazing Marsh in the south;
- The Sussex Local Nature Partnership (SxLNP) have identified several Priority Habitats that are considered to be 'at risk' due to declines in the extent, condition and/or distribution of these habitats:-
  - Coastal Vegetated Shingle;
  - Lowland Fen;
  - Reedbed;
  - Lowland Heathland;
  - Intertidal Mudflats;
  - Lowland Meadows; and
  - Lowland Calcareous Grassland (primarily in the north and SDNP).

1.16 The data confirms that the majority of the 'at risk' habitats, protected species and designated sites above, fall within the BOAs with the exception of the following:-

- Small areas of calcareous grassland in the northeast of the district within the SDNP;
- Lowland meadow associated with the Fontwell Park Racecourse SNCI in the west of the district (outside of the SDNP), and
- Coastal vegetated shingle in the far south of the district.
- Ancient woodland habitat of particularly high value in the northwest of the district (frequently in the SDNP) is not covered by a BOA.
- The Felpham SSSI which is designated for its geological interest and part of the Bognor Regis SSSI;
- Pagham Harbour SPA/Ramsar buffers (supporting sites for the wintering birds) mostly fall outside the BOAs;
- The majority of the bat records are outside the BOAs (particularly the woodlands around Slindon in the SDNP that support colonies of Bechstein's bats but these are within the buffer associated with the Singleton and Cocking Tunnels SAC including Fontwell and Norton);
- Of the five Local Wildlife Sites (LWS), formerly known as SNCIs, in the District, only the Littlehampton Golf Course and Atherington Beach LWS occurs within a BOA. All the remaining LWSs occur outside of the BOAs.
- Marine habitat is limited within the BOAs with only the Chichester Coastal Plain BOA, however, the marine environment along the district's coastline contains diverse habitats including large areas of Kelp Forest, which are the subject of the Kelp Restoration Project.

### **Final Report (Stage 3 and 4)**

- 1.17 The Final Report makes recommendations including for policy development and implementation as part of the Arun Local Plan update. For policy development and implementation, the study discusses the use of the BOAs as a key focus for nature recovery through BNG which can be taken on board in updating the Local Plan policies and the Policies Map through amending/extending some BOA boundaries and linking corridors and islands of biodiversity as well accommodating further opportunity areas.
- 1.18 Therefore, the first recommendation is for the nine BOAs (identified at para 1.13 above) to be extended to correlate and include the clustering of additional notable habitats and species. The majority of these are focused in the more northern part of Arun Local Planning Authority area, including where they would cross the boundary into the SDNP, as such requiring conversations and coordination with the SDNP over where and how this may practicably be delivered.
- 1.19 As well as identifying potential extensions to the existing BOAs, the report recommends a further spatial approach of setting:-
- a) 'Core Areas' with High Value should cover the existing BOAs; SSSIs; LWSs (formerly SNCIs); Ancient Woodland; LNRs; MCZ; Pagham Harbour buffer A; the potential Bechstein's Bat Corridor; plus Priority Habitats identified to be 'at risk' through the Sussex Local Nature Partnership; and
  - b) 'Opportunity Areas' with Medium Value are suggested to cover Priority Habitats not at risk; Pagham Harbour B; the wider Singleton to Cocking Tunnels buffer; potential wildlife corridors and B-lines.
- 1.20 A similar approach has been successfully piloted in the Cornwall Local Nature Recovery Strategy (LNRS). The resultant map this would create if taken forward in Arun is shown in Background Paper 1.
- 1.21 Further, the BNG Interim Report identified that there are limited marine habitat conservation areas along the district's coastline, which contains a number of diverse habitats. It is recommended that further investigations are undertaken to identify, at a more localised level, potential marine biodiversity improvement areas and activities; e.g. to identify whether there is any other habitats or species which could be enhanced within the Arun coastal / marine area including large areas of Kelp Forest (the subject of the Kelp Restoration Project) including for some other habitats (e.g. seagrass beds). Therefore, a key recommendation of the study is for marine BOAs to be created (e.g. through working collaboratively with the Sussex Local Nature Partnership to establish boundary changes which can be used for the Local Plan Update) , to ensure that these would be able to be protected and enhanced in the same fashion as the terrestrial ones that already exist. Marine BOAs may also provide a significant role in helping to contribute towards carbon capture and the Council's overall ambition to be carbon neutral by 2030.

1.22 Importantly, the Final Report recommends that a new clear Bechstein's Bat Corridor be identified and potentially designated, around the routes where bats from Singleton and Cocking Tunnels potentially forage, to fall across from the far north west corner of the Arun District, from the Tunnels down to and entering the Local Planning area of Arun at Fontwell, to go westward to the edge of Rewell Wood southwards along Binsted Valley and eastward across to the edge of Tortington Common. This suggested route is shown on Background Paper 2 and 3.

1.23 The Final Report lastly recommends proposed wildlife corridors to join up the biodiversity network more fully. These could be full corridors or strategically important 'steppingstones' through habitat patches, facilitating movement. Possible places initially identified for these are shown on Background Paper 4. Engagement with landowners over where exactly these fall, will be crucial before adoption, or integration into any local plan review or other future documents. For example, some species clusters suggest that there may be potential habitats worth investigating within some of the urban areas for enhancement, although the exact routes of these are yet to be determined.

#### **Other Actions**

1.24 The BNG study should shape working with Sussex Nature Partnership and other partners and internal departments to ensure delivery of the identified strategic BNG opportunities, including where they connect to those areas outside Arun's planning remit. This will evidence a spatial strategy for the implementation of an Arun 'local levy' in line with the Act, to be focused on improving, managing and increasing access to nature.

1.25 To further develop the spatial framework above, for any BOA extensions it is recommended to:-

- Agree a date by when the objectives should be met – corresponding to the appropriate planning update period or to reflect any set out in national legislation, such as secondary legislation resulting from the Environment Act or any similar documents or guidance issued.
- Establish the exact extent and condition of each Priority habitat within the area;
- Establish a short-list of Priority Species within Arun that can be monitored within the BOAs. Species across a range of groups should be used, some indicative of Priority Habitats that occur within the BOAs (e.g., Ramshorn Snail, Brent Geese)
- The Council specifically identify any existing land in the district managed through the Higher-Level Stewardship Schemes; and
- Work with Kelp Restoration Project and Sussex Nature Partnership to help investigate the best areas for and establishment of marine BOA approach;

1.26 For discussion with neighbouring authorities:

- Share the report particularly identifying the development of draft biodiversity policies to ensure consistency;
- Ensure that partners agree with extent of boundary changes;

- Finalise consistent actions and as far as possible responsibilities.

1.27 And other actions would be:

- Identify if there are any other habitats or species which could be enhanced within the Arun coastal/marine area
- Continue supporting the Sussex Kelp Restoration trawling bylaw;
- Continue engagement opportunities with SxLNP to enable this and further work to tie in with the Local Nature Recovery Network;
- Keep up to date with the small sites biodiversity metric<sup>4</sup>;
- Take account of the preferred route for the Arundel bypass (known as the 'Grey Route'), and impact on habitat and species and potential mitigation proposals once available;
- Monitor the forthcoming work currently being undertaken by Natural England and DEFRA into cost of habitat units.

### **Next Steps**

1.28 The BNG Study provides a robust evidence base that will help to inform the Local Plan update (when this resumes) and shape appropriate Biodiversity Net Gain policies and a spatial framework (to be identified on an updated Policies Map) to guide policy implementation through development management obligations, to be secured via an 'Arun local levy'. Local levies are in their infancy as these were only introduced through the Environment Act and it is intended that further detail will come through secondary legislation. It is expected they will operate in a similar fashion to the existing S106, CIL systems or another new vehicle of conservation covenants.

1.29 The study should be posted onto the Council's web site as part of the Local Plan update evidence base.

## **2. PROPOSAL(S):**

That the Planning Policy Committee agrees the Biodiversity Net Gain Report recommendations and actions as part of the evidence base to prepare the Local Plan update when it resumes.

## **3. OPTIONS:**

3.1 The following options are available:

- To agree the recommendations and actions of the BNG study; or
- Not to agree the recommendations and actions of the BNG study.

---

<sup>4</sup> This was finally published and adopted as a supporting document with the biodiversity metric update on 21.4.22, so can be found at [The Biodiversity Metric 3.1 - JP039 \(nepubprod.appspot.com\)](https://nepubprod.appspot.com)

<b>4. CONSULTATION:</b>		
Has consultation been undertaken with:	<b>YES</b>	<b>NO</b>
Relevant Town/Parish Council		x
Relevant District Ward Councillors		x
Other groups/persons (please specify)		x
<b>5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)</b>		
Financial	x	
Legal		x
Human Rights/Equality Impact Assessment		x
Community Safety including Section 17 of Crime & Disorder Act		x
Sustainability	x	
Asset Management/Property/Land		x
Technology		x
Other (please explain)		x
<b>6. IMPLICATIONS:</b>		
<p>The BNG study be used as the basis for the identification of areas of appropriate actions to deliver 'Biodiversity Net Gain' within appropriate and defined areas of biodiversity value (e.g., BOAs) , that can be used for negotiating the inclusion BNG on site provision (e.g., habitat creation, enhancement and management) within development site, subject to applications for development, as well as informing the introduction of an Arun 'local levy' to fund identified strategic off-site BNG provision where this cannot be achieved on site. The study be placed on the website as part of the evidence base informing the Local Plan update (when resumed).</p>		

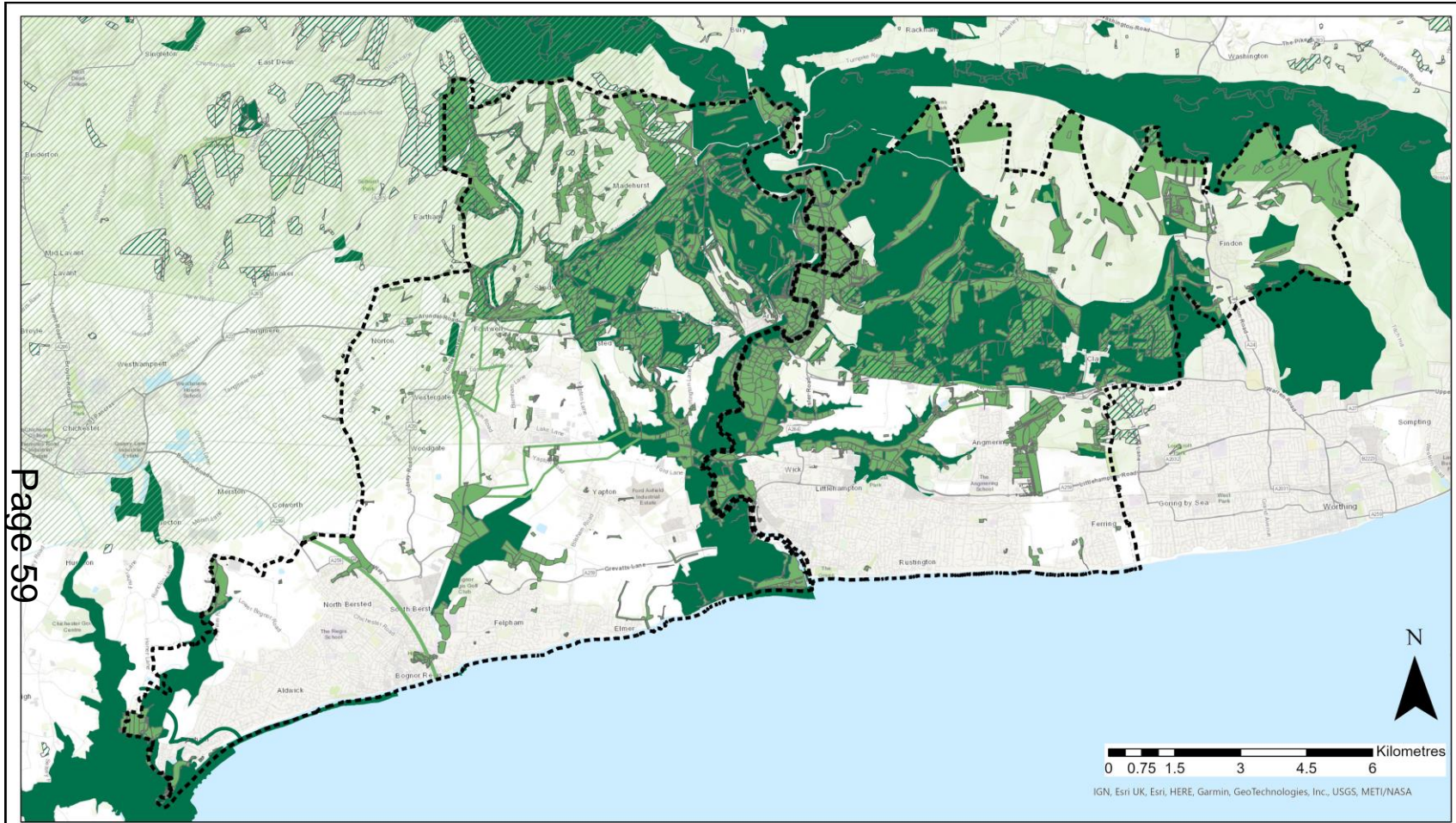
**7. REASON FOR THE DECISION:**

To ensure that the authority meets its statutory biodiversity obligations under the Environment Act 2021 including national policy and plan making planning legislation.

**8. BACKGROUND PAPERS:**

1. Core and Opportunities Approach in Arun
2. Proposed Bechstein's Bat Corridor in context
3. Proposed Bechstein's Bat Corridor in focus
4. Potential Wildlife Corridors
5. The Arun Biodiversity Net Gain Study, Combining the 'Interim Report' (Stage 1 & 2) and 'Final Report' (Stage 3 & 4): - <https://www.arun.gov.uk/landscape-planning-policy>
6. Full Council minutes resolving Environment & Scrutiny minutes to declare Climate Emergency - [Arun District Council](#)





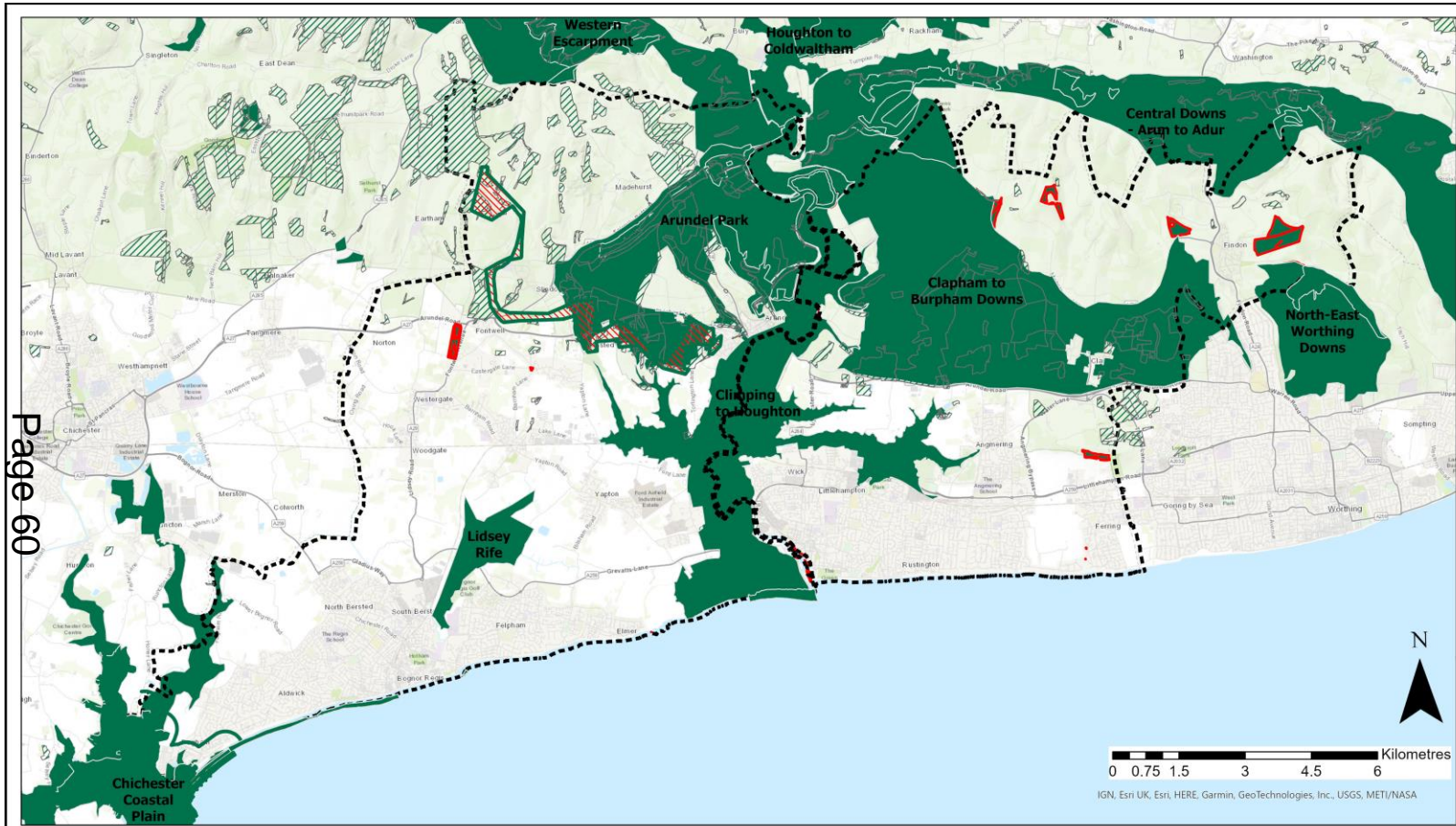
- ▬ Arun District Boundary
- ▨ Ancient Woodland
- ▧ Singleton and Cocking Tunnels SAC 12km Buffer
- Strategic Areas with High Value
- Semi-Strategic Areas with Medium Value

Figure 3.6: Arun District's Strategic Areas and Semi-Strategic Areas  
C0310: Arun District Council Biodiversity Net Gain





Background Paper 2 – Proposed Bechstein’s Bat Corridor in context



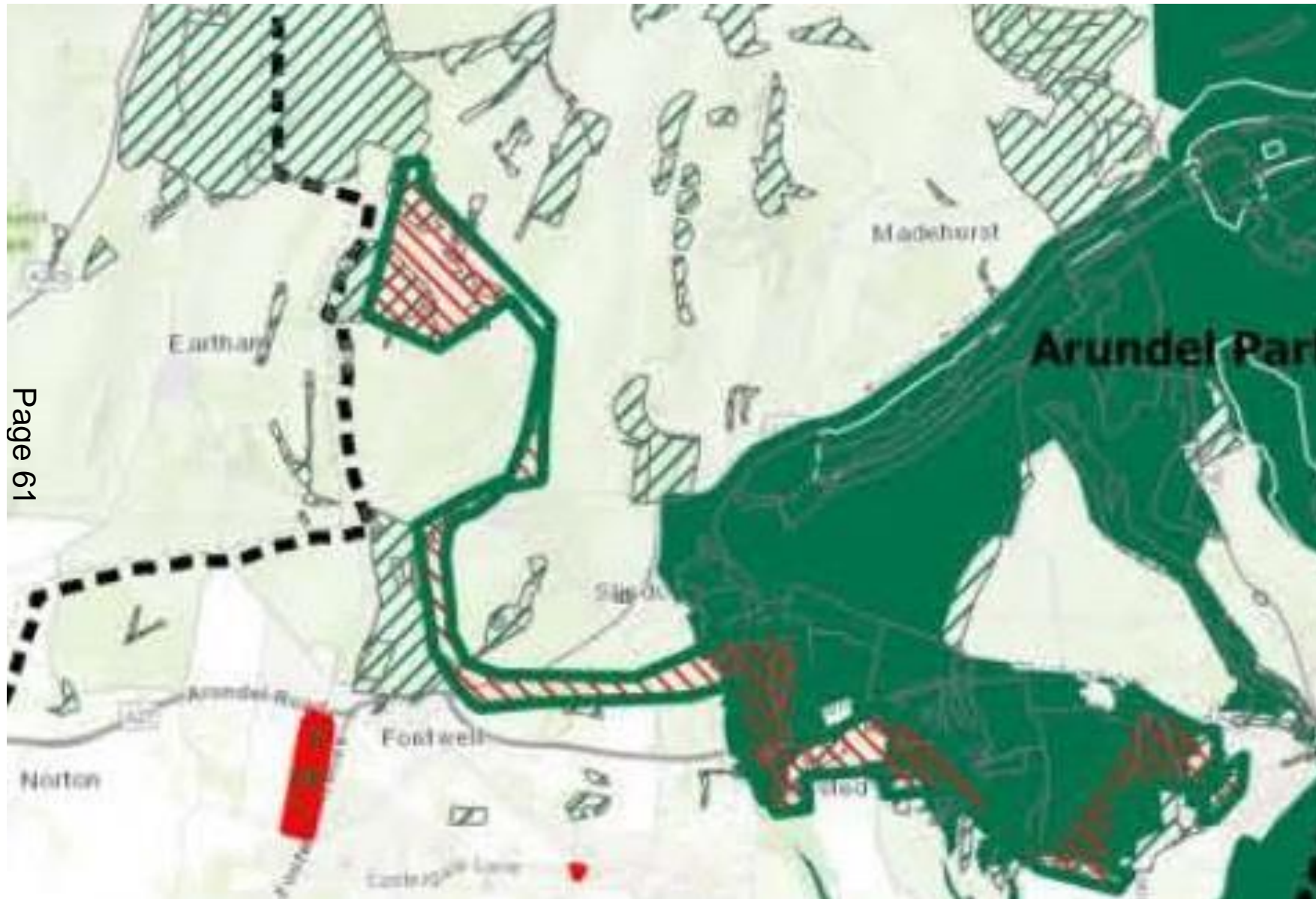
Page 60

- Potential Bechstein's Bat corridor
- Ancient Woodland
- SACs
- SPAs
- SSSIs
- Pagham Harbour Buffer A
- Arun District Boundary
- BOA
- Strategic Priority Habitats

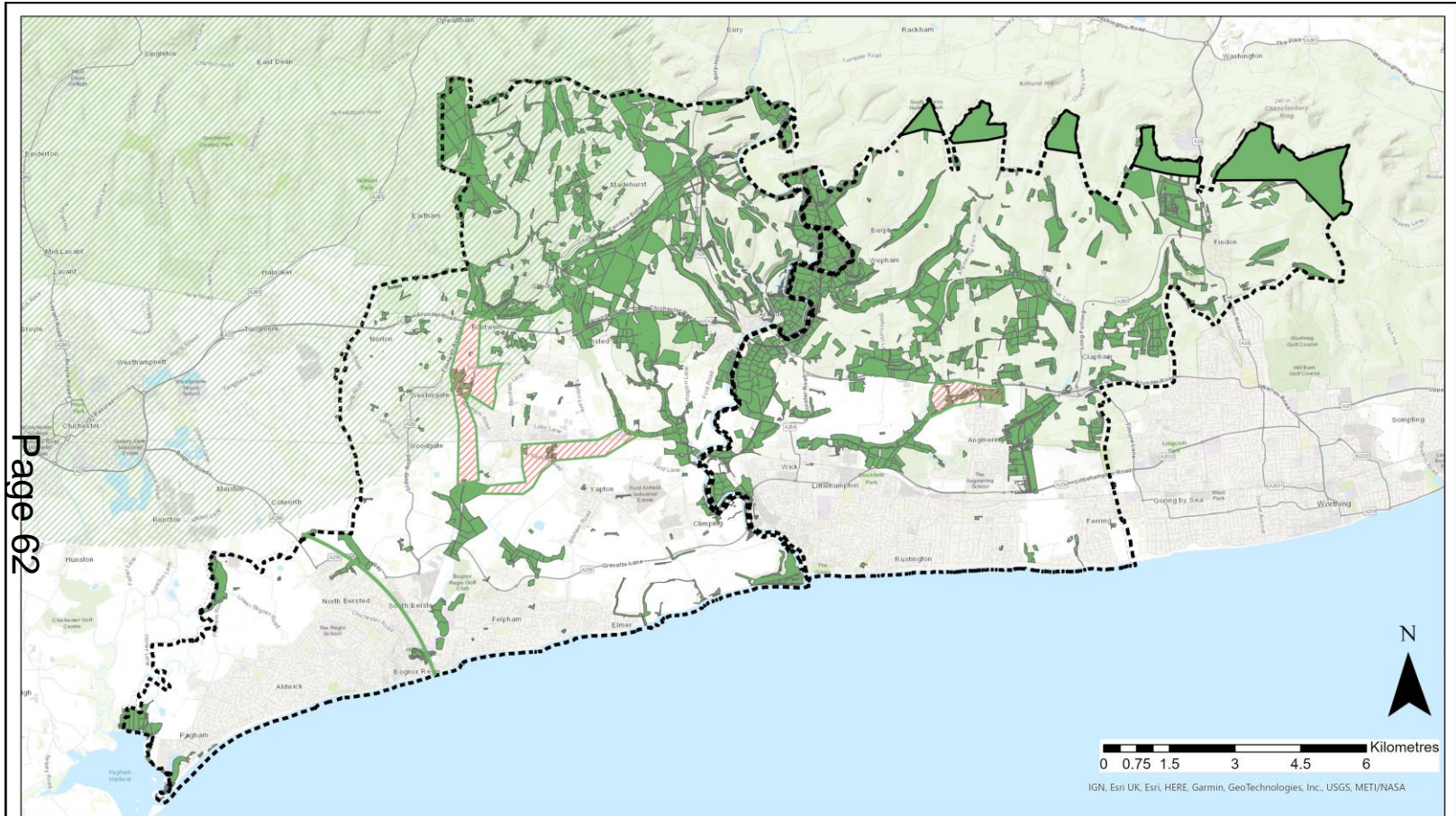
Figure 3.5: Strategic Areas with High Value  
C0310: Arun District Council Biodiversity Net Gain







Background Paper 4 – Potential Wildlife Corridors





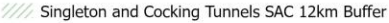



-  Potential wildlife corridor
-  Indicative B-Lines
-  Singleton and Cocking Tunnels SAC 12km Buffer
-  Pagham Harbour Buffer B
-  Arun District Boundary
-  Semi-Strategic Priority Habitats

Figure 3.4: Semi-Strategic Areas with Medium Value  
C0310: Arun District Council Biodiversity Net Gain



## EQUALITY IMPACT ASSESSMENT

<b>Name of activity:</b>	Biodiversity Net Gain Study	<b>Date Completed:</b>	23/05/22
<b>Directorate / Division responsible for activity:</b>		<b>Lead Officer:</b>	Kevin Owen
<b>Existing Activity</b>	<input type="checkbox"/>	<b>New / Proposed Activity</b>	<input type="checkbox"/>
		<b>Changing / Updated Activity</b>	<input checked="" type="checkbox"/>

### What are the aims / main purposes of the activity?

Biodiversity Net Gain is a policy in the Development Plan aiming to achieve nature recovery a a result of proposed development

### What are the main actions and processes involved?

Updating Planning Policy to deliver the requirements of the Environment Act and ensuring that BNG policy delivers biodiversity net gain and 10% minimum through development management decisions

### Who is intended to benefit & who are the main stakeholders?

Biodiversity intrinsic value as well as for Arun communities and environmental custodians responding to the challenges posed by climate change and built development

### Have you already consulted on / researched the activity?

Yes as part of the adopted Arun Local Plan and now with key environmental stakeholders Local Nature Partnership and Sussex Wildlife Partnership

### Impact on people with a protected characteristic (What is the potential impact of the activity? Are the impacts high, medium or low?)

Protected characteristics / groups	Is there an impact	If Yes, what is it and identify whether it is positive or negative
	<b>Yes</b>	Health and wellbeing benefits for all sections of the community
<b>Age</b> (older / younger people,	<b>Yes</b>	Health and wellbeing benefits

children)		
<b>Disability</b> (people with physical / sensory impairment or mental disability)	<b>No</b>	
<b>Gender reassignment</b> (the process of transitioning from one gender to another.)	<b>No</b>	
<b>Marriage &amp; civil partnership</b> (Marriage is defined as a 'union between a man and a woman'. Civil partnerships are legally recognized for same-sex couples)	<b>No</b>	
<b>Pregnancy &amp; maternity</b> (Pregnancy is the condition of being pregnant & maternity refers to the period after the birth)	<b>No</b>	
<b>Race</b> (ethnicity, colour, nationality or national origins & including gypsies, travellers, refugees & asylum seekers)	<b>No</b>	
<b>Religion &amp; belief</b> (religious faith or other group with a recognised belief system)	<b>No</b>	
<b>Sex</b> (male / female)	<b>No</b>	
<b>Sexual orientation</b> (lesbian, gay, bisexual, heterosexual)	<b>No</b>	
Whilst <b>Socio economic</b> disadvantage that people may face is not a protected characteristic; the potential impact on this group should be also considered	<b>No</b>	



**What evidence has been used to assess the likely impacts?**

West Sussex County Council <https://westsussex.moderngov.co.uk/documents/s21906/Agenda%20Item%209%20-%20Appendix.pdf>

**Decision following initial assessment**


<b>Continue with existing or introduce new / planned activity</b>	<b>Yes</b>	<b>Amend activity based on identified actions</b>	<b>Yes</b>
---	------------	---	------------

**Action Plan**

<b>Impact identified</b>	<b>Action required</b>	<b>Lead Officer</b>	<b>Deadline</b>
Health and Wellbeing all sections of the community	Update and Implement policies and decisions	KO	LP timetable

**Monitoring & Review**

<b>Date of last review or Impact Assessment:</b>	N/A
<b>Date of next 12 month review:</b>	June 2023
<b>Date of next 3 year Impact Assessment (from the date of this EIA):</b>	June 2025

<b>Date EIA completed:</b>	23/05/22
<b>Signed by Person Completing:</b>	

Page 65



# Agenda Item 12

## Planning Policy Committee - Work Programme

Planning Policy Committee	Lead Officer	Date of Meeting	Time	Full Council Meeting Date
Local Plan Evidence Update - Biodiversity Net Gain Study  Local Plan Evidence Update - Tourism & Visitor Accommodation Study  Housing Delivery Test Update  Arun Local Plan Update – 6 month review  Arun Infrastructure Topic Papers - A27 junction Improvements; Wastewater Capacity; Water Neutrality; Housing Market Absorption  Work Programme	<b>Kevin Owen</b>	<b>7 June 2022</b>	6pm	13-Jul-22
Local Development Scheme (LDS) Update  Arun Housing Market Absorption Study  Transport for the Southeast Strategic Investment Plan Consultation  Gypsy & Traveller Development Plan Document Update  Arun Transport Apportionment Methodology Update  Work Programme	<b>Kevin Owen</b>	<b>27 July 2022</b>	6pm	14-Sep-22
Work Programme		<b>21 September 2022</b>	6pm	09-Nov-22

Planning Policy Committee - Work Programme

Work Programme		<b>24 November 2022</b>	6pm	18-Jan-23
Work Programme		<b>26 January 2023</b>	6pm	15-Mar-2023