

APPENDIX 1: Review of the Arun Local Plan DM policies – April 2020

Policy Title	Recommendation <ul style="list-style-type: none"> No update Partial policy update Full policy update OR Other actions, unrelated to policy update <p><i>Include a brief summary why this recommendation has been made</i></p> <p>Note – DM* indicates where officer comment made on effectiveness or use of policy in decision making.</p>
LAN DM1 Protection of Landscape Character	Partial update – National policy and guidance highlight shaping places in positive ways that contribute to radical reductions in greenhouse gas emissions, climate resilience and low carbon energy and associated infrastructure. The role of countryside and rural economy is likely to change in some places e.g. decentralised energy sources and storage. Evidence should be commissioned to inform this approach to allocate land in the right places while conserving protective and sensitive landscapes. The policy text may need a full or partial update.
LAN DM2 The Setting of Arundel	‘Other actions’ – consider any evidence through consultation with stakeholders on whether any updates needed.
EMP DM1 Employment Land: Development Management	Partial update – DM* clarification of minor wording issue to ensure integration of protected species. {
EMP DM2 Enterprise Bognor Regis	No update – the policy appears to be compliant with national policy and guidance.
TEL DM1 Telecommunications	Partial policy update – DM* policy is little used. However, likely to be of increasing importance. National policy update emphasises setting out a strategic policy – e.g. pattern and scale and quality [and other DM requirements.
RET DM1 Retail development	Full Review – DM* frequently used policy – needs review of: - <ul style="list-style-type: none"> reuse of vacant retail floorspace (including upper floors) primary and secondary shopping frontages Include re-use of vacant buildings to the rear of shops in policy RET DM1 5. impact assessment for new development of over 200sqm and 1000sqm Overall further technical work needed to assess this policy approach.
TOU DM1 Tourism related development	Partial policy update – DM* frequently used, effective policy however, clarify application of policy in relation to all types of caravan/tent site e.g. caravans replaced with lodges for example which have the same level of residential impact.

SO DM1 Soils	Partial policy update – DM* frequently used policy however, not effective because of ambiguity over application of policy criteria; avoidance and mitigation of best soils; and assessing conflicting development and the need for a sustainability and options appraisal.
HOR DM1 Horticulture	Partial policy update – DM* policy not frequently used. Potential to include NPPF requirement to ‘enhance’.
RET DM2 Garden Centres	No update – policy not frequently used. Not directly addressed by national policy or guidance, no local evidence requiring change.
EQU DM1 Equine Development	Partial Policy update – DM* wording clarification needed i.e. the meaning of “Non-residential planning permission will be granted...” in the context of stabling horses.”
H DM1 Housing mix	<p>No update – DM* update;-</p> <ul style="list-style-type: none"> • definition self-build homes compliant with national policy • including role of up-to-date SHMA for special accommodation needs. <p>Other actions’ – further clarification of supporting text for need categories (Affordable housing, Older and disabled, gypsy and travellers, Student housing, Rural housing, Self-build and custom build etc..</p>
H DM2 Independent living and care homes	Partial policy update - updated national policy and guidance providing more emphasis on needs of older people and special needs – this needs further clarification wording on how the authority will consider such provision and scale of provision as part of plan making and viability.
H DM3 Agricultural, forestry and horticultural Rural workers’ dwellings	Partial policy update - updated national policy and guidance providing further clarification on criteria to consider - determining whether provision is necessary to the business/operation, viability, animal welfare, security, scope for improvements to existing accommodation or temporary dwellings, excluding assembly/seasonal workers.
H DM4 Conversion of rural buildings for residential use	Partial policy update – National guidance updates link between strategic policies to determine degree of restrictive policies based on evidence of local need. Also, some potential opportunity to improve references to residential curtilage size and protected species.
D DM1 Aspects of form and design quality	Partial policy update - DM* policy well used and effective at appeal. However, recommend including reference to Masterplan making. This will allow where necessary, masterplans to be required to be adopted as supplementary planning documents where necessary. Consider whether this is included in Policy D DM1 or whether a new policy is needed.
D DM2 Internal space standards	<p>No update – complaint with national policy and guidance (no recent updates). However, should ADC have data which suggest that internal space standards beyond the nationally described space standard is required then this policy may require updating.</p> <p>‘Other actions’ – establish monitoring of local evidence on standards being achieved.</p>
Paragraph 13.3.5 External space standards	No update –The Arun Design Guide SPD includes guidance on external space standards.

D DM4 Extensions and alterations to existing buildings (residential and non-residential)	No update –compliant with national policy and guidance, no local evidence requiring change.
The following two Policies are Strategic Policies in the greyed-out rows	
ECC SP1 Adapting to Climate Change	Partial policy update – updated national policy and guidance on adaptation and mitigation measures: - <ul style="list-style-type: none"> • Spatial strategy on natural flood management, • Land provision for physical protection measures and • Future relocation of vulnerable development and infrastructure from flood risk/climate change • Sequential approach in Policy W DM2 is likely to need updating as when further updated climate change allowances are published by Environment Agency (e.g. Coastal flooding March 2020).
ECC SP2 Energy and climate change mitigation	Partial update - compliant with updated national policy and guidance however: - <ul style="list-style-type: none"> • Climate Change Emergency and Zero Carbon 2050 will need to be accommodated; • Government initiatives (10 point plan) to deliver COP18 commitments; • ADC Council commitment to contribution to net zero carbon by 2030 and steps towards a district wide target.
ECC DM1 Renewable Energy	Partial policy update – updated national policy and guidance: - <ul style="list-style-type: none"> • Scope to delivering co-location of developments and facilities (e.g. CHP/district heating) • Additional compatibility of energy policy with amenity/heritage - impact and significance and important to their setting • Protecting local amenity and cumulative impact be given proper weight in planning decisions.
OSR DM1 Protection of open space, outdoor sport, community and recreation facilities	No update – DM* policy frequently used effective. Compliant with national policy and guidance, no local evidence requiring change.
T DM1 Sustainable Travel and Public Rights of Way	Partial policy update – DM* clarification needed on operation of criteria (e.g. closed or inclusive list) and overlap with Policy T SP1. Scope for;- <ul style="list-style-type: none"> • “Active Travel” reference, the Design Guide and reference to Healthy Lifestyles and carbon emission reductions. • Monitor EV technology and prepare updates to Parking SPD where required/include new policy. • Offsite infrastructure projects will be funded by CIL <p>Consolidating text from TSP1 (Transport and Development) and TDM1</p>

T DM2 Public Parking	Partial policy update – compliant with national policy and guidance – however as for T DM1 above – scope to balance the use of public car parks in town centres with improvements to public transport hubs/connectivity with town centres.
HER DM1 Listed Buildings	No update – compliant with national policy and guidance. However, keep under review.
HER DM2 Locally Listed Buildings or Structures of Character	Partial policy update – compliant with national policy and guidance. However, scope to improve the future proofing of the policy to deal with the issue of placing criteria outside of the policy to allow for change. ‘Other action’ – supporting text to list criteria and scope for other evidence and SPD.
HER DM3 Conservation Areas	No update – compliant with national policy and guidance.
HER DM4 Areas of Character	Partial policy update - compliant with national policy and guidance. However, scope to improve the future proofing of the policy to deal with the issue of placing criteria outside of the policy to allow for change. ‘Other action’ – supporting text to list criteria and scope for other evidence and SPD.
HER DM5 Remnants of the Portsmouth and Arundel Canal	No update – no updated national policy and guidance or no local evidence requiring change.
HER DM6 Sites of Archaeological Interest	Partial Update – DM* more concise policy wording needed. National policy emphasis on ‘significance of assets. Review to ensure concise and that the policy to include references to ‘significance’
ENV DM1 Designated Sites of Biodiversity or geographical importance	No update - compliant with national policy and guidance. [Net gains in bio-diversity see ENV DM5]
ENV DM2 Pagham Harbour	No update but keep under review – DM* well used, effective. Compliant with national policy but minor addition required for purposes of clarity on Zone A mitigation requirement where no impact and clarify reference to ENV DM1 test criteria. ‘Other actions’ - keep under review local evidence on efficacy and scope of the policy. with regard to mitigation, nitrates and water quality.
ENV DM3 Biodiversity Opportunity Areas	No update - compliant with national policy and guidance. ‘Other actions’ – review scope for specific enhancement/management actions for specific corridors/networks – perhaps SPD.
ENV DM4 Protection of trees	Partial policy update – compliant with national policy and guidance. However, scope for integration with net bio-diversity gain policy objectives in policy ENV DM5.
ENV DM5 Development and biodiversity	Partial policy update - compliant with national policy and guidance. However, does not include a measurable metric on net gains in biodiversity e.g. 10% (pending Government policy) and may also need habitat establishment and maintenance element.

W DM1 Water supply and quality	<p>Partial policy update – DM* modest use, effective. However, national policy and guidance updated. Emphasise need for WFD objectives to achieve ‘good’ status for water bodies and reference to 25-year Environment Plan (e.g. groundwater and abstraction SPZs etc) design considerations (e.g. Permeable surfaces of green infrastructure multiple benefits) and site wastewater treatment/connection.</p> <p>‘Other actions’ – strengthen cross boundary and duty to cooperate actions.</p>
W DM2 Flood Risk	<p>Partial policy update – DM* well used and effective although scope to include clearer reference to need for sequential assessment to take into account future climate change. Broadly compliant with national policy and guidance directly covering flood risk but makes no reference to requirement for specific allocation of land for natural flood relief. Scope for rationalising with policy W DM4.</p>
W DM3 Sustainable Urban Drainage Systems (SuDS)	<p>No update - compliant with national policy and guidance.</p>
W DM4 Coastal Protection	<p>Partial policy update – compliant with national policy and guidance. However, review local evidence to determine need to designate any Coastal Change Management Areas (CCMA) and integrate with policy W DM2 or create new policy.</p>
Natural resources and minerals safeguarding	<p>‘Other action’ – the adopted Joint Minerals Local Plan 2018 provides the policy framework for minerals safeguarding in Arun. Arun will liaise under the ‘Duty to Cooperate’ with the joint Minerals Planning Authorities (West Sussex County Council and South Downs National Park) on any requirements for the Arun Local Plan review.</p>
WM DM1 Waste Management	<p>No update - compliant with national policy and guidance.</p> <p>‘Other action’ – the adopted Joint Waste Local Plan 2014 was recently reviewed and found not to need updating. This plan provides the up to date policy framework for waste disposal in Arun. Arun will liaise under the ‘Duty to Cooperate’ with the joint Waste Planning Authorities (West Sussex County Council and South Downs National Park) on any requirements for the Arun Local Plan review.</p>
QE DM1 Noise Pollution	<p>Partial Policy update – DM* well used effective. Updated national policy and guidance introduces:</p> <ul style="list-style-type: none"> • Early acoustic design considerations, • levels of impact significance (including cumulative and sensitive uses and noise exposure hierarchy table) and • Mitigation – improved local environmental conditions, • ‘agent of change’ principle.

QE DM2 Light Pollution	<p>Partial Policy update - DM* well used effective. Updated national policy and guidance introduces</p> <ul style="list-style-type: none"> • lighting design considerations, • addressing impacts (including cumulative and sensitive uses) and • mitigation – ‘agent of change’ principle.
QE DM3 Air Pollution	<p>Partial policy update – updated national policy and guidance - include reference to: -</p> <ul style="list-style-type: none"> • green infrastructure and tree planting as a mitigation measure for all developments to reduce air quality impacts. <p>This also relates to updates mentioned above to Policy T DM1.</p>
QE DM4 Contaminated Land	<p>Partial policy update – compliant with update to national policy and guidance – but could clarify: -</p> <ul style="list-style-type: none"> • That allocation of land known to be contaminated will only be for appropriate forms of development and • Clarity on the approach to remediation and responsibility of developers for monitoring - including future remedial action.