

**REVISED DRAFT ADUR LOCAL PLAN 2013
BACKGROUND EVIDENCE DOCUMENT**



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INTRODUCTION

Adur District Council is consulting on a Revised Draft Local Plan for Adur 2013 (prepared under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012). The purpose of this consultation is to seek the views of the community and stakeholders on all policies and proposals within the Revised Draft Local Plan.

The aim of this paper is to provide more background to some of these issues, and the information and evidence the Council has already gathered.

WHICH AREA DOES THE REVISED DRAFT LOCAL PLAN COVER?

In April 2011 the South Downs National Park Authority came into being, following the designation of the National Park on 31st May 2010. It is now the Local Planning Authority for the National Park area which extends across 15 local authorities including Adur. The National Park is developing its own Local Plan.

The Revised Draft Adur Local Plan therefore only relates to those parts of Adur District which lie outside of the National Park. That is the area referred to when we say 'Adur' in this document. It includes the built up areas of Lancing, Sompting, Shoreham-by-Sea, Southwick and Fishersgate. The majority of Adur's housing, employment, facilities and services lie within this area.

DEFINING THE BUILT UP AREA BOUNDARY

Please refer to Appendix RD1 in the Revised Draft Adur Local Plan for maps of the proposed changes to the Built Up Area Boundary

Introduction

The Vision, Spatial Strategy and the detailed policies of the Revised Draft Adur Local Plan guide development to specific areas and also seek to protect other certain areas from new development.

In line with government guidance and a presumption in favour of development within the built-up area, the priority is to locate new development within the urban area and to protect and enhance the countryside. As such, a boundary needs to be defined to demarcate what is the urban/built-up area and what is countryside. This is known as the Built Up Area Boundary (BUAB).

Policies in the Local Plan will refer to this boundary which will be shown on the Policies Map. A review of the current Built-Up Area Boundary (BUAB) as shown on the Proposals Map of the adopted Adur Local Plan (1996) has taken place and the results of this are detailed in this paper (which was previously published in the Background Evidence Document 2012, which accompanied the Draft Adur Local Plan 2012).

The Revised Draft Adur Local Plan is still emerging and this community engagement exercise (Reg 18) will consult on strategic allocations to meet housing and employment needs on the edge of the existing built-up area.

Map 29 and Map 31 in Appendix RD2 of the Revised Draft Adur Local Plan propose amendments to the Local Green Gap boundary to take account of the proposed strategic allocations. It is intended that the Built Up Area Boundary will follow the Local Green Gap boundary in these areas once the precise boundaries have been agreed.

Purpose of the Built-Up Area Boundary

The purpose of this paper is to:

- Explain the purpose of the BUAB and the methodology used to define this.
- Propose changes to the BUAB where appropriate as a result of the review

The spatial strategy of the emerging Revised Draft Local Plan seeks to encourage the development of appropriate sites within the existing urban areas as well as some, more sustainable greenfield sites on the edge of settlements to meet the need for new homes and jobs. This approach facilitates development in the existing urban areas, close to where facilities already exist and will provide an

opportunity to improve existing infrastructure and help to deliver new facilities. Although some greenfield land is required, this will be carefully managed. This approach also maintains the existing settlement pattern.

The BUAB is a policy tool which is used to identify the areas in which development (including infilling, redevelopment and conversion) is acceptable in principle. These areas do not necessarily include all existing developed areas and they should include land allocated to meet the needs of the Local Plan. Land outside of the BUAB is defined as countryside and coastal beach where the focus is on protection and enhancement and where development is limited to those uses which are compatible with a countryside or beach location and have a need for a location outside the built-up area. Policies within the Revised Draft Local Plan set out in more detail what forms of development are appropriate in these areas. These policies will be used in conjunction with Government guidance to determine planning applications.

As such, the main aims of the BUAB are:

- To provide a clear guide as to where development is generally acceptable and where it is not, so that development does not encroach onto the countryside or coastal beach in an unplanned manner.
- To safeguard the form and character of existing urban/built-up areas.
- To make the best use of land within the built-up areas particularly on previously developed land.
- To protect the countryside and the coastal beaches from inappropriate development.

Which Area Does this Review Cover?

The South Downs National Park Authority (SDNPA) took on full powers from April 2011. This new authority will produce its own Local Plan in due course, which will set planning policy for all areas within the South Downs National Park boundary. As a consequence, this Revised Draft Local Plan does not cover that part of Adur District which lies within the National Park and can only relate to those areas of Adur District which lie outside of the National Park. Consequently, this review and any resulting amendments to the built-up area relate only to those parts of Adur District which lie outside of the National Park.

Methodology used in this Review

The Adur Local Plan (1996) defined a BUAB and this has been reviewed in the light of:

- Sites adjacent to but outside the current BUAB that have been developed or have planning permission where it may be appropriate now to include within the BUAB.

- Areas adjacent to but outside the current BUAB that may relate more to the urban environment than to the surrounding countryside e.g. roads.
- The designation of the new South Downs National Park and its boundary.
- The recommendations of the Urban Fringe Study (December 2006) and the Strategic Housing Land Availability Assessment (March 2009).
- A number of character studies undertaken including the Adur Character Study June 2009; West Sussex Landscape Management Guidelines (based on West Sussex Landscape Character Assessment. 2003 (WSCC); the Shoreham Historic Character Assessment (2009) and the Adur Historic Land Classification Maps (WSCC).
- A set of criteria (see below).

Specific review tools included site surveys, use of aerial photos and reference to previous background evidence used for the Adur Local Plan examination (1995).

Criteria used for defining the Built-Up Area Boundary

The criteria used allows a consistent approach and to create defensible boundaries. The criteria are as follows:

- The BUAB should include existing planning consents for development (related to the built-up areas) and new completed development adjacent to the boundary. This will also eventually include those sites allocated for development when the Local Plan is adopted.
- The BUAB should generally follow defined physical features such as roads, hedges, field boundaries and existing property lines.
- The BUAB can include greenfield sites which are predominantly encompassed and part of the built form and also well defined by strong boundary features. Examples could include parks and other open spaces used for recreation as well as rear gardens to dwellings (now defined as greenfield land in Government advice¹).
- The BUAB should follow the whole curtilage of properties except where such properties include large open areas that extend into the existing countryside, are not encompassed by built form and are not separated by a strong boundary.
- Edge of settlement activities that relate well to the built-up area such as community facilities, some recreational facilities and employment activities should be included within the BUAB. Activities that relate more to the countryside such as agriculture, forestry and activities that require significant open areas should be left outside the BUAB.

¹ National Planning Policy Framework 2012 (Annex 2 Glossary)

- Development that is close to but physically separate from the built-up area (including the Ricardo employment site on the northern side of the Airport and Sompting village south of the A27) should not be included within the BUAB. This is to maintain a strongly defined boundary and to avoid areas of countryside from being unnecessarily included within the BUAB.
- Where the National Park boundary and the Local Green Gap boundary are not coterminous, the area should remain outside of the BUAB and within the Local Green Gap as the openness and view across them remain.

Recommendations of the Review (previously published in Draft Adur Local Plan 2012)

With the exception of those areas which are to be consulted on for meeting future housing and employment needs up to 2031 on the edge of the existing built-up area, it is proposed that the current BUAB as shown on the Local Plan (1996) Proposals Map should remain largely unchanged. However, a number of minor changes are proposed below with an explanation.

The South Downs National Park was formally designated in 2010 and the boundary confirmed prior to this in 2009 following a public examination and this has been taken into account in this review. Whilst the boundary follows that of the existing BUAB in many places as shown on the 1996 Adur Local Plan Proposals Map, there are a number of exceptions to this and where relevant to this review are referred to below.

Recreation area, south of Hamble Road, Sompting

This is a recreational area containing a children's play area and a skateboard facility. It serves as a local recreational space for the adjacent residential area. The boundary of the built-up area is currently drawn to exclude this area. However the site is surrounded on its northern, eastern and western sides by residential development. It has a clear boundary and the nature of its uses clearly relate to the urban area. As such it is proposed that the site is included within the built-up area. However, the nature of the current use is likely to preclude consideration of the site for alternative development uses.

Street Barn, West Street, Sompting

These dwellings were built in 2005. The rear gardens protrude beyond the built-up area boundary by approximately 20 metres into the Local Green Gap (formerly strategic gap) as allowed for in the planning consent at the time. It was considered that there was no conflict with the Strategic Gap policy in the Adur Local Plan (1996) since the gardens (as well as a balancing pond) replaced existing large agricultural buildings on the site which protruded beyond the built-up area boundary. It is proposed to amend the built-up area boundary to include the whole of this development.

Upper Brighton Road and Steepdown Road, south and east of Halewick Farm, Sompting

In this location the boundary of the built-up area is currently drawn along the south side of the road following the rear garden boundary of the houses Upper Brighton Road and the front garden boundary of the houses in Steepdown Road. The National Park boundary excludes these roads with its boundary drawn on their northern and western side. Whilst the roads allow open views of the countryside to the north and west, the roads are part of the urban/built form in this location. It is therefore proposed that the roads are included within the built-up area. This would also be consistent with the built-up area boundary along the western side of the Old Shoreham Road adjacent to the river in Shoreham.

Rear gardens of properties on north side of Firlle Road and Fairview Road, Lancing

The gardens consist of large areas of land which back on to the National Park (the boundary of which runs along the rear garden boundaries). The BUAB is currently drawn along the middle of the rear gardens and at the time took into account the Area Of Outstanding Natural Beauty (AONB) designation which came down to this middle boundary. With the designation of the National Park, there is no longer an AONB designation in this location. The gardens are part of the curtilage of the houses. They have defined boundaries and being well landscaped with trees and shrubs are different in character to the open nature of the downs, despite their size. It is therefore proposed that the gardens are included within the built-up area.

Sompting Cemetery, west of Lynchmere Avenue, Sompting

The boundary of the built-up area is currently drawn to exclude the cemetery and the area of open space (used for informal recreation) to its west from the built-up area. The National Park boundary runs along the northern edge of the cemetery and therefore excludes it. The cemetery has a defined boundary which takes the form of a fence on its northern edge. The site, including the open space, is surrounded by residential development on its eastern, southern and western sides although landscaping and the low heights of the houses (bungalows) give the site an open and unenclosed aspect reinforced by the open views of the Downs to the north. However the nature of the uses clearly relate to the urban area. As the site is also surrounded on three sides by houses, it is proposed that the area is included within the built-up area. The nature of the current uses is likely to preclude consideration of the site for alternative development uses.

A27 from the Holmbush Centre to the Local Green Gap boundary at Mill Hill, Shoreham-by-Sea

The boundary of the built-up area is currently drawn to the rear of the Holmbush retail centre and along the rear gardens of the houses south of the A27 before meeting the Local Green Gap boundary. It therefore excludes the A27 and its embankment which are defined as countryside. The National Park boundary runs

along the northern edge of the A27 carriageway to include the embankment. It is proposed that the BUAB should include the A27 and its southern embankment since the road is part of the built form and urban edge of this part of Shoreham. The steepness of the slope of the embankment (part of which, to the north of Saxons (road), is a Site of Nature Conservation Interest) is likely to preclude consideration of the site for development.

School playing field north of Summersdeane and east of Downsway, Southwick

The boundary of the built-up area is currently drawn along the southern edge of the field defining it as countryside. The field is excluded from the National Park (the boundary of the Park runs along the northern edge of the field). The field is used as a sports field for Portslade Aldridge Community Academy and is occasionally let out to a local football club. There are goal posts set out on the field although these do not preclude informal recreation use e.g. for walking. The land is owned by Brighton & Hove City Council who will transfer the land on a 125 year lease to the Academy in due course. Brighton & Hove City Council assumes that the Academy will make as much use of the site as a sports field as they can. On three sides the field is surrounded by uses related to the urban area – residential to the west, residential, allotments and open space to the south and residential and part of the Academy playing fields to the east. The National Park is to the north with its boundary demarcated by a fence.

Given that the site is largely surrounded by urban development; is used and likely to be more intensively used for formal recreation and excluded from the National Park, it is proposed that this site is defined within the urban area and the BUAB defined to run along the northern edge of the field. The site, whilst allowing views of the open downs, relates more to the urban area in its location, use and character. As an Academy playing field with anticipated increased usage, consideration of the site for development unrelated to the recreation use is considered unlikely.

As part of the wider review of the BUAB, two further areas warranted further investigation - Adur Close (Lancing) and part of Steyning Road (Shoreham-by – Sea. However, it is considered that these did not meet the criteria above and therefore no change to the BUAB is being proposed (see the BUAB map for the District appended or to the Proposals Map for the Adur Local Plan 1996).

Adur Close, Lancing

Adur Close consists of 9 dwellings and an access road with its turning head and small car park on its eastern side. The current BUAB runs along the front edge of the front gardens to the dwellings but excludes the road. The Local Green Gap is to the north and east of the dwellings. This road and car park is part of the built form of the residential area and it is therefore proposed that these remain within the BUAB. A small area of overgrown scrub land abuts the access road and car

park on its eastern side but this is not part of the housing area and should remain outside the built-up area.

Numbers 1 and 3 Steyning Road and land north of 3 Steyning Road, Shoreham-by-Sea

Currently these two houses and parcel of land to the north of number 3 are within the Local Green Gap. To the north and south is open land and to the west is the River Adur. Although part of the site lies within the Old Shoreham Conservation Area, it is separated from other development by Steyning Road. It is proposed that this area should continue to be excluded from the built-up area due to its open nature.

Policy application

Although there is a presumption in favour of development within the built-up area this does not necessarily mean that planning permission will be granted for a specific development proposal. Saved policies in the Adur Local Plan (1996) and policies in the emerging Local Plan will also apply which may mean that development proposals are contrary to the development plan.

Also, as highlighted above, in all those cases where the built-up area boundary is proposed to be changed, the new areas to be included are in such uses (for example, in recreational and cemetery use; roads and their embankments) which are likely to preclude their consideration for alternative forms of development.

Areas outside the Built-Up Area

The following areas are proposed to remain as countryside (excluding any new allocations which may arise in the emerging Local Plan):

- Land within the South Downs National Park (which will not be part of the Adur Local Plan as explained above) where one of the primary purposes of the Park Authority is to conserve and enhance its natural beauty, wildlife and cultural heritage.
- Open areas between the settlements of Shoreham and Lancing and Worthing and Sompting/Lancing –defined as Local Green Gap. Notwithstanding any future allocations which may be made on the edges of these areas, the Revised Draft Adur Local Plan proposes that open areas are maintained to protect the character and identity of the settlements. Countryside policies will apply in these areas.
- That part of Sompting Village which lies outside of the South Downs National Park (and therefore within the remit of this emerging Local Plan) but within the Local Green Gap. This part of the Village is close to but physically separate from the built-up area. Given its countryside location

and its linear and historic character, it is not considered appropriate to expand or intensify the village.

- The Ricardo employment site is located within the Shoreham – Lancing Local Green Gap and is physically separate from the built-up area. The absence of a boundary would not preclude some new employment development related to the occupier of the whole site within or on the edges of the employment site as long as compatible with policies in the Adur Local Plan
- The shingle coastal beaches are sea defences. These are valued for recreation purposes and some have value for nature conservation. Any development on these beaches would jeopardise their function and value. They are therefore considered to remain outside the built-up area.

DEFINING LOCAL GREEN GAPS

Please refer to Appendix RD2 in the Revised Draft Adur Local Plan 2013 for maps of the proposed changes to the gap boundary

This Revised Draft Adur Local Plan 2013 refers to two 'Local Green Gaps' at Lancing/ Sompting–Worthing, and Lancing-Shoreham-by-Sea. These succeed the former 'strategic gaps' identified in the Adur Local Plan 1996.

Background

Strategic Gaps were a feature of the West Sussex Structure Plan from the 1980s. The West Sussex Structure Plan 2001-2016 (West Sussex County Council, 2005) defined a strategic gap as an 'area of largely open land between settlements, listed in the Structure Plan, which helps to maintain the separate identity and amenity of major settlements and prevent their coalescence with each other or with very close small settlements. The boundaries are defined in local plans'.

Strategic Gaps were viewed as having strategic importance. The principle was to maintain the settlement pattern and hence the character of the County as a whole. The Lancing-Shoreham and Lancing/Sompting - Worthing Gaps were both identified as strategic gaps in the West Sussex Structure Plan 2001-2016 (Policy CH3).

The Structure Plan also identified Local Gaps – 'areas of open land between smaller settlements, listed in Local Plans, which help to maintain their separate identity and prevent their coalescence' (WSSP 2006, WSCC).

Although the Structure Plan designated the broad location of these strategic gaps, it made clear that it was for Local Plans (prepared by Districts and Boroughs) to define their precise boundaries through the Local Plan process.

It is important to note, also, that strategic gaps were a local designation rather than national, and as such did not, and do not have the same status as 'Green Belt' (which has its basis in legislation). Furthermore, the boundaries are not 'sacrosanct' but can be amended through the development plan process. It is useful to note that strategic gaps were not designated on the basis of landscape quality.

The Adur Local Plan therefore designated the precise boundaries of the strategic gaps within Adur District, and these were enshrined within the adopted plan in 1996.

The current approach to Gaps

Since the adoption of the 1996 Local Plan, and the Structure Plan in 2005, there has been a significant change in the approach to 'wider than local' planning.

Firstly the South East Plan, adopted in 2009 superseded the West Sussex Structure Plan; as such, Structure Plan policies do not form part of the development plan.

Secondly, the South East Plan did not incorporate the policy tools of strategic or local gaps. (The South East Plan has now been revoked and does not form part of the development plan).

The National Planning Policy Framework (2012) now sets out the Government's planning policies. It contains a core planning principle (to underpin plan making) whereby planning should 'take account of the different roles and character of different areas, promoting the vitality of our main urban areas...recognising the intrinsic character and beauty of the countryside...' (paragraph 17, NPPF 2012).

The important role of the Gaps was identified in the Adur Characterisation Study undertaken by consultants in 2009 (please refer to the LDF page on the Council's web site). This study defined the urban areas as distinct neighbourhoods and the gaps as important in retaining their separation. The Gaps are important features of the overall character of Adur. The study also referred to the Lancing/Sompting – Worthing gap as an ecological and landscape corridor linking the South Downs to the sea.

It is important to recognise that the Worthing Core Strategy (2011) safeguards the remaining area of the gap between Lancing/Sompting and Worthing which is located within Worthing Borough.

Defining Local Green Gaps

As a result of this changing policy background, it has been necessary to reconsider the approach to gaps taken in this emerging Adur Local Plan.

A local policy designation (in addition to countryside policy) is still viewed as beneficial, in order to maintain the separate identity and prevent the coalescence of Adur's settlements.

However, a change of name is necessary, to reflect that these gaps are no longer 'strategic' (in that they are not defined within any other strategic plan) but have a locally important role. The term 'Local Green Gaps' has, therefore been used.

A number of criteria have been used to define the gaps in the Revised Draft Adur Local Plan; these are similar to that used by the West Sussex Structure Plan (2005) as they remain relevant and appropriate. Land identified as Local Green Gaps should have the following properties:

- Open and undeveloped character of land (this does not relate to landscape quality although some areas of gaps may happen to be of good quality)
- Form a visual break between settlements – actual and perceived (from physical development or level of activity)
- Create a sense of travelling between settlements
- Boundaries to follow physical features on the ground taking account of the need to accommodate development requirements of the Plan
- Only include land necessary to secure the objectives of gaps on a long term basis

The starting point for defining the boundary of the Local Green Gaps was the current Strategic Gap boundary in the Adur Local Plan (1996). An assessment has been made as to whether all or part of the open areas between settlements serve the policy function of an open green gap, taking account of the above criteria, the review of the built-up area boundary, the South Downs National Park boundaries, and the need to allocate land for new development to meet future needs of Adur. Account was also taken of the Urban Fringe Study (2006) and the Landscape and Ecology Study (2012). Views from roads, the railway line, public footpaths, Lancing College, the Airport, the National Park and adjacent residential and employment areas have been considered. The edges of the settlements are in most cases clearly defined when seen from the above views.

The Lancing/Sompting – Worthing Local Green Gap and Lancing – Shoreham-by-Sea Local Green Gap)

RD Policy 13 of the Revised Draft Local Plan 2013 addresses Adur's Countryside and Coast (which includes the two Local Green Gaps). The aim of the Policy is to protect the countryside from inappropriate development.

These Gaps are located within the countryside outside of the defined Built-Up Areas (and, as the Local Plan does not cover the area of the South Downs National Park, they also lie outside of this designated area).

In the case of areas defined as gaps, a further degree of protection is given through an additional policy test. RD Policy 13 states with regard to the Gaps:

'...Local Green Gaps between the settlements of Lancing/ Sompting–Worthing, and Lancing-Shoreham-by-Sea will be protected in order to retain the separate identities and character of these settlements. Within these areas any development permitted must not (individually or cumulatively) lead to the coalescence of settlements.'

This policy test does not apply to those areas designated solely as countryside.

The gaps have been defined taking account of the following:

- The function of the gaps and criteria which defines these.

- The review of the built up area boundary undertaken as part of the Local Plan process.
- The boundary of the South Downs National Park (policies for which will be included in the SDNP Local Plan).
- The need to meet Adur's objectively assessed development needs for housing and employment on the fringe of the Built-Up Area.

At the time of writing, and until the new Adur Local Plan is adopted, the Lancing Gap and the Sompting Gap are defined and protected by the saved Strategic Gap policy (AC4) in the adopted Adur Local Plan, which has a presumption against development. The policy aims to prevent coalescence of the settlements and to retain their separate identities and amenities. Only in 'compelling' circumstances will development be permitted and in such cases, only in relation to uses such as agriculture and forestry or to meet a demand for informal recreation. The Local Plan policy also states that opportunities will be sought to conserve and enhance the value of the Strategic Gaps as open countryside.

As explained above what is now being taken forward in the Revised Draft Adur Plan 2013 are not strategic (in other words not defined by 'wider than local' policy) but local gaps – i.e. gaps to maintain separation between settlements in Adur and hence to protect their identity and character based on locally derived objectives and evidence.

Local Green Gaps and the Proposed Strategic Allocations

As stated elsewhere in the Revised Draft Adur Local Plan, the need to meet objectively assessed development needs up to 2031 has necessitated an examination of the potential of greenfield sites on the edge of the urban areas in Adur. An Urban Fringe study was commissioned in 2006 to identify the opportunities and constraints in landscape terms for development in the urban fringe. The contribution of specific areas within the gaps to the landscape and its importance to the gap was assessed. The primary consideration was not whether the Gaps should remain but whether there are parts which are not fulfilling their function and could be developed without damaging their integrity. However, it was not the role of this study to review the specific boundaries of the gaps or the principle of the policy. A number of sites on the urban fringe were identified with development potential.

A Landscape and Ecology Study was commissioned in 2012 which was to build on the earlier Urban Fringe Study. This study assessed the landscape and biodiversity issues and impacts that could arise from the potential development of a number of greenfield sites. In terms of landscape, the study used two criteria:

- landscape character sensitivity – the degree to which the landscape is robust and able to accommodate change without adverse impacts on its character; and

- visual sensitivity - the general visibility of the landscape and its ability to accommodate change without adverse impacts on character.

The location and boundaries of the strategic allocations are informed by the above studies. The allocations aim to strike the best possible balance between providing new development to meet the needs of Adur, while at the same time maintaining and enhancing the local landscape character and individual identity of settlements. The boundary of the Gaps follows the edge of the strategic allocations (other than the country park proposed as part of the New Monks Farm development, which will remain in the countryside, and Local Green Gap) and their built up area boundaries as shown on the maps in the Revised Draft Local Plan 2013.

Proposed Boundary Changes:

(Please see Appendix RD2 of the Revised Draft Adur Local Plan 2013 for maps)

The boundary of the South Downs National Park (a policy for which will be included in the SDNP Local Plan).

The South Downs National Park will be the subject of a separate Local Plan prepared by the South Downs National Park Authority and is not covered in this Local Plan. As such, the boundary of the Gaps within Adur needs to be amended in a limited number of areas to exclude areas designated as National Park. These areas are:

The Lancing – Shoreham-by Sea Gap

It is proposed that the boundary of the Gap is revised to follow the southern edge of the A27. The boundary of the Gap will follow the edge of the potential developed area of the strategic allocation at New Monks Farm with the proposed country park remaining within the Gap. The amended boundary includes the allotments on the eastern side of the Lancing Manor Leisure Centre grounds. The remaining strategic gap area to the north of the A27 lies within the South Downs National Park and is therefore excluded from the Revised Draft Adur Local Plan.

The Lancing/ Sompting–Worthing Gap

It is proposed that the boundary of the Gap should follow the southern edge of the A27 up to the administrative boundary with Worthing Borough. The proposed boundary will be drawn around the potential strategic allocation at West Sompting, excluding it from the gap. The remaining strategic gap area to the north of the A27 lies within the South Downs National Park and is excluded from this Revised Draft Adur Local Plan.

The review of the Built-Up Area Boundary and Local Green Gaps as part of the Local Plan

A review of the Built-Up Area Boundary has also been undertaken. (The proposed changes can be found in the Revised Draft Adur Local Plan Appendix RD1, with more explanation elsewhere in this Background Evidence Document). Appendix RD2 indicates proposed changes to the Gap boundaries (reasons set out below). In addition, allocations progressed through the Local Plan process will also result in changes to the Local Green Gap boundaries.

Applying the criteria used to define the Local Green Gaps and the criteria used to define the Built Up Area Boundary (see elsewhere in this document for the BUAB review) means that the boundaries of the Local Green Gaps and the Built Up Area Boundary are coterminous throughout Adur.

The review indicates that the proposed changes to the BUAB necessitate an amendment to the previous strategic gap boundary in four areas: (See Appendix RD1 of the Revised Draft Adur Local Plan 2013 for maps)

Recreation area south of Hamble Road – Sompting

This play area (which is surrounded on three sides by residential development) has been brought into the built up area, on the basis that it is a use more related to the urban residential area. It is therefore proposed that the Local Green Gap boundary also excludes this play area, and the boundary is redrawn to follow the built-up area boundary. (Please note that the play area will still be protected as open space).

Street Barn, West Street – Sompting

The built-up area boundary is proposed to be amended to include the gardens of new housing development which is now built. As such it is proposed that the Gap boundary is coterminous with this boundary.

Allocation in the 1996 Adur Local Plan for employment development adjacent to proposed East Worthing Access Road

Policy DP AE3 in the Adur Local Plan (1996) for new business development linked to a proposed access road has not been 'saved' as the road is no longer programmed nor appropriate. As such, the Gap boundary should be amended to include this area as countryside and Local Green Gap and to follow the administrative boundary of Worthing.

Conclusion

Members and Officers support the important role of the gaps for keeping separate the settlements in Adur and thereby retaining their separate identities and character. If no gaps existed, there would be continuous urban development from Brighton to Worthing impacting on the environment, amenity for local residents and visitors as well as Adur's attractiveness as a place to live, work, visit and enjoy recreation.

OBJECTIVELY-ASSESSED NEEDS: DEVELOPING A HOUSING REQUIREMENT FIGURE FOR ADUR

Introduction

Following the Government's announcement that Regional Spatial Strategies were to be revoked, it became necessary for Local Planning Authorities to develop their own assessment of the amount of housing *required*, in line with the National Planning Policy Framework. (Please note this is not the figure for the amount of housing to be *delivered*, as proposed in the Revised Draft Adur Local Plan 2013) This paper highlights the work undertaken by Adur District Council in this respect. Please note that the studies referred to here are available on the Council's website (www.adur-worthing.gov.uk/adur-local-plan-consultation)

1.0 Locally Generated Housing Needs Study 2011

Adur District Council commissioned a study from consultants GL Hearn in 2011. This 'Locally Generated Housing Needs Study' considered housing needs and demand in Adur, which are affected by growth in population and the size and structure of households. The study used a range of scenarios to look at various 'drivers' of the housing market and what impact they might have on housing requirements. It looked at both demographic (population based) factors, and economic ones. It also looked at some supply issues, such as the potential regeneration development at Shoreham Harbour and, briefly, the availability of land within the District. Key issues and conclusions are set out here.

Population Trends:

Adur's population has been growing since 1994 (6.2%, or 0.4% per annum); at a lower rate than county, regional or national rates). Since deaths exceed births, this growth has been driven by net in-migration (primarily from the Brighton and Hove and London areas). The study found that over the previous 5 years the rate of net in-migration had been running at an average of 380 people per annum.

A range of demographic projections were modelled, in order to assess the implications of varying rates/ types of growth. In order to take account of economic factors, and the relationship between the economy and housing, the study also looked at factors such as employment rates, characteristics of the working population, and travel to work patterns. Three economic scenarios were undertaken which looked at different levels of employment growth. The study also considered household size.

Housing Supply

A brief overview of supply-side issues was provided in the study, taking into account Strategic Housing Land Availability Assessment (SHLAA) sites, and the Shoreham Harbour Development Capacity and Viability Study (current at the time), and develops a housing trajectory scenario. The study concluded it is necessary to consider sites outside of the built up area boundary to address the levels of demand indicated in the projections above. Chapter 8 of the study also looked at the implications for house types in Adur

Conclusions and recommendations:

The table below sets out a summary of the projections in the study, and the requirement for dwellings in Adur that each would generate.

Summary of Projections 2011-31	
Scenario	Dwellings per annum 2011-31
Demographic Driven Projection:	
Trend based Projection (Proj 1)	269
Official National Projection:	
CLG 2008-based household projections	282
Economic Led Projections	
Trend-based Economic Growth (Proj 9)	303
Enhanced Employment Growth in Adur (Proj 10)	319
Enhanced Supply Side Intervention (Proj 11)	321
Component Analysis	
Zero Net migration (Proj 2)	72
Zero employment Growth (Proj 7)	205
Zero Population Growth (Proj 8)	124

The report reached the following conclusions:

“A realistic assessment of housing need/demand is for between 235 – 255 dwellings per annum over the period 2006 – 28, or for between 270-320 households for the period 2011-31” and that “...it is likely to be very difficult for Adur to deliver sufficient new housing to fully meet the need/ demand identified.” (paras 9.5 and 9.6, LGHS, GL Hearn 2011)

The study explains that the lower-end figure represents an assessment of housing need/demand based on past population and demographic trends

(PROJ1) while the higher figure adjusts this to take account of projected economic growth (PROJ9)

It should be noted that these figures are based on demographic projections, needs and demands, and do not take account of capacity issues. The recommended housing requirement is significantly higher than that required by the South East Plan, which took capacity issues into account.

2.0 Coastal West Sussex Strategic Housing Market Update 2013

This was commissioned in late 2012 (by Adur District Council, Arun District Council, Chichester District Council and Worthing Borough Council, together with the South Downs National Park Authority) in order to update the Coastal West Sussex Strategic Housing Market Study (SHMA) 2009, and therefore enable updated evidence to be available to support the authorities' respective Core Strategies/ Local Plans at Examination. As such, it differs from the LGHN 2011 in that it focuses on a range of housing need/ demand information, rather than purely the matter of housing requirements, and covers several planning authorities, rather than just Adur. However, it does in part replicate the modelling of the LGHN, updating it to take account of more recent data and included a vacancy allowance where appropriate. In terms of housing requirements, it updates figures using the 2010 based ONS Sub-national population projections released in March 2012. Coastal West Sussex forms part of the wider Sussex Coast Housing Market Area

The projections utilised by the SHMA Update are based on population trends, and cover the period from 2011-2031. (Please note the SHMA document explains the background behind each projection in detail, and looks at figures for the Coastal West Sussex area as well as each of the commissioning authorities individually).

The SHMA update also carried out a sensitivity analysis of assumptions regarding headship rates – comparing the rates used in the study at a level somewhere between long-term trends projected in CLG based household projections and past trends over the past 10 years. A full explanation may be found in paragraphs 8.77 – 8.79 of the study.

Due to the timing of the study, it considered the estimated delivery of housing as proposed in the SHMA area, using numbers in the emerging planning policy documents of the local planning authorities involved in the study. These of course also take into account delivery and capacity issues, rather than the pure 'requirements side' projections of the SHMA. (Please note that the numbers proposed by the authorities at this point had no formal policy basis, but were the most up-to-date available at that time).

The study concluded that it appears unlikely that even the demographic-based projections for housing requirements will be met in the SHMA area, given the prevailing strategic constraints to development in the sub-region. In addition, the study concluded that expected housing delivery was likely to fall significantly short of assessed needs; meeting 53% of projected requirements for the wider Sussex Coast Housing Market (which includes Brighton and Hove, Lewes, and the South Downs National Park) (based on the main employment-led projection) 65% based on the 5 year migration projection, and 71% based on 10 year migration projections. Therefore on this basis, housing land supply could fall 30% or more below assessed housing need/ demand.

In detail, demographic projections indicated overall need/demand across the wider housing market for 63,400-69,900 homes 2011-2031, based on past demographic trends (while forecast economic growth would lead to an increased requirement with need/demand for 77,300 over the 20 year period). However the study notes that given the land availability and infrastructure constraints across the sub-regional housing market, these levels are unlikely to be achieved

The potential indicated in current/ emerging Plan policies at the time of the study was 40-45,000 homes from 2011-2031; which would support some growth in labour supply across the wider housing market. Economic growth more widely could be supported by reductions in out-commuting to work or increased in-commuting in surrounding areas although the study notes that the feasibility of this will be affected by the relative earnings which can be achieved. It notes that at the time of the study, identified housing potential indicated 40,000-45,000 homes across the area from 2011-2031. Implications arising from under-supply identified by the study include subdued household formation and higher levels of concealed households, and adverse impacts on the local economy and commuting. Should the economy pick up, economic growth could lead to an even higher level of demand/ need which could not be met.

Implications for Adur:

The study clearly notes that development in Adur is likely to be restricted by the availability of land – the district's capacity for development being influenced by its geography. Land in Adur is relatively intensely developed, with limited opportunities for the extension of existing settlements without eroding the gaps between them. Flood risk is a significant development constraint, as is the road infrastructure. The report indicates there are some challenges to delivering housing at Shoreham Harbour, although it will play an important role in meeting Adur's needs (at the time of the study, the Council's approach was that housing from Shoreham Harbour was to be ringfenced separately from the wider Adur target, in keeping with the approach taken by the South East Plan). The study also notes there is a need to balance the development of housing with the need for economic regeneration.

The SHMA Update indicated an annual range housing requirement in Adur of between 186-215 homes per annum (2011-31) based on past demographic trends (the higher level based on more recent 5 year trends). Based on forecast employment growth (taking into account commuting dynamics) the SHMA indicates a requirement of 213 dwellings per annum for Adur, based on Experian forecasts.

(Please note that the SHMA also makes a range of other recommendations on matters such as housing type, amount of affordable housing required, and housing for particular groups).

3.0 Housing (Duty to Co-operate Study) 2013

Following the completion of the Coastal West Sussex SHMA in 2012, the authorities within the Sussex Coast Housing Market Area (HMA) (Adur, Arun, Brighton and Hove, Chichester, Lewes, Worthing – also the South Downs National Park Authority) commissioned a further housing study to pull together various evidence addressing objectively assessed housing requirements as well as residential land supply and capacity/ constraints to development, including environmental, landscape and infrastructure constraints.. (Please note that this study does not take into account the Census 2011 data as this was not available at the time the study was undertaken). Some key points are set out below.

This study was commissioned as part of the Government's Duty to Co-operate requirement, with specific regard to identifying the implications of the DTC in terms of housing delivery. (The full aims of the study may be found in the study's Introduction).

The study sets out the NPPF requirements, and states that while there is a lack of clear guidance from Government, it appears from recent examinations and appeals that both demographic projections and evidence of housing needs is expected to be considered in assessing housing requirements. An explanation of the methodology may be found in paragraph 4.7 of the study.

Drawing together a range of data, the study finds that an objective assessment of Adur's housing requirements (without considering supply-side issues) ranges from 215 dwellings per annum – 245 dwellings per annum (dpa) (a median figure of 230 dpa).

The study summarises the findings of Adur's LGHN 2011 and SHMA Update 2012 (and the findings for each of the respective authorities in the study area). It then moves on to consider land supply issues in each authority – residential land supply, development constraints and the potential for strategic development (Chapter 5). It looks at policies in current and emerging plans (as at late 2012/ early 2013) as well as the potential for further development over and above this.

The study refers to the consultation carried out by Adur District Council in Autumn 2012, and the two potential levels of development consulted on (see Adur's website for more details), and gives an overview of Adur's land supply based on the Strategic Housing Land Availability Assessment, as well as a consideration of development potential at Shoreham Harbour, and delivery issues. (Again, at this point in time the ringfencing of housing at Shoreham Harbour was assumed).

The study notes strategic constraints to development in Adur – including the very limited land supply outside of the existing built up areas due to the geography of the district and the South Downs National Park and that the exceptions to the developed areas outside of the National Park boundary are the two gaps – Lancing/Sompting – Worthing Gap, and Lancing – Shoreham Gap.

With specific regard to the gaps, the study notes their modest size; their role in maintaining the physical separation and identity of the settlements, and function as ecological and landscape corridors (supporting the setting of the National Park). The study also notes that development opportunities within these gaps will be influenced by constraints including flood risk, infrastructure and landscape capacity.

The study then looks at development potential outside the Built Up Area Boundaries, looking at the options presented for development within the Draft Adur Local Plan 2012. This consulted on a variety of options at three main locations: New Monks Farm, Hasler, and Sompting (divided into two locations – Sompting Fringe and Sompting North). This section concludes by saying that housing targets for the Local Plan area are likely to be primarily influenced by assessed land supply which could be delivered in the plan period, within the plan area – consistent with the approach previously taken by the South East Plan.

However the study states in para 5.36 that contingency should be made to take account of not all SHLAA sites coming forward; challenges in relation to development at Shoreham Harbour; and key infrastructure deficiencies.

Para 5.37 indicates that in advance of detailed technical work and consultation on development options,

“It would be reasonable to assume the delivery of a maximum of 180-200 homes per annum across the plan area might be achievable (subject to further detailed assessment)” para 5.37 GL Hearn 2013.

This figure is based on development within the built up area, greenfield sites within the urban fringe (that is assuming *all* locations previously consulted on in the September 2012 document are progressed). However it should be noted that the figures for Adur are based on an assumption that all greenfield sites assessed by the study (that is, all locations in the Draft Adur Local Plan

consultation 2012) can come forward. Given that not all sites addressed by study have been included within the Revised Draft Adur Local Plan 2013 the figure indicated in this study study is not proposed to be delivered.

However the study goes onto say in 5.37:

“Even delivery of 180-200 homes per annum would be ambitious and, in our view, require public sector support and intervention. Given the shortfall against assessed need, this proactive role in helping to enable and support delivery will be important.” para 5.37 GL Hearn 2013

The study goes on to note that the Council *is “evidently making serious attempts to meet its own development needs”* but notes that there are increasingly fewer opportunities to do so which are consistent with achieving sustainable development. Para 5.39 explicitly states that it seems likely that Adur will fall short of meeting the District’s full development needs; and that it is not feasible for Adur to meet any unmet requirements from neighbouring authorities.

The overall conclusions of the Duty to Co-operate Housing Study are that across the six Local Authority areas, the total objectively assessed housing needs (for market and affordable housing) would come to 3,160 dwellings per annum (median figure – indicative findings). However it is made clear that this is unlikely to be achieved:

“This Study demonstrates that it is highly unlikely that this level of development can be achieved across the sub-region in light of the significant environmental, landscape and infrastructure constraints to development. Flood risk is also a significant development constraint, and includes coastal, river and groundwater flooding. These factors significantly limit the scope for development across the sub-region, but particularly within the central part of the sub-region which includes Worthing, Adur and Brighton and Hove There are thus few further greenfield development options, coupled with limited brownfield capacity.”
GL Hearn 2013

The study suggests that housing delivery over the period to 2031 across the HMA, based on current evidence, is likely to fall at least 20% below objectively assessed needs. Sub-regionally, the most significant likely shortfall against assessed needs is expected to arise in the centre of the sub-region in City of Brighton and Hove, Adur District, Lewes District and Worthing Borough. Given that the surrounding districts within the HMA have similar land supply constraints to Adur the study concludes there is no obvious solution to meeting the shortfall against objectively-assessed development needs, and that it will be important that the Council works with the other authorities at the sub-regional level to consider longer-term development options, both within and potentially outside of the sub-region.

Updated Demographic Projections for Sussex Coast Authorities

Following the Duty to Co-operate (Housing) Study, work is being undertaken to update this with respect to the 2011 Census, 2011-based interim sub-national population projections, and revised mid-year population estimates and components of change for the 2002-11 period.

This will be published in due course.

HOUSING IMPLEMENTATION STRATEGY

In accordance with the National Planning Policy Framework, a Housing Implementation Strategy (describing how a five year supply of housing to meet the housing target can be maintained) will be prepared for the Submission version of this Local Plan in 2014.

The Housing Implementation Strategy will include:

- Contingency Planning – to identify, if possible, different delivery options if actual housing delivery does not take place at the rate expected
- A risk assessment – to identify obstacles and constraints to housing delivery and management strategies to address any risks
- The approach to engaging with housebuilders and other key stakeholders – to ensure that housing delivery objectives are understood and accepted, including positive engagement through pre-application discussions
- The approach to regular monitoring and review – how actual housing delivery performs against the housing trajectory
- An indication of the circumstances in which specific management actions may be introduced and what these actions might be – should monitoring demonstrate that objectives are not being met or risk not being met

Indicative Housing Trajectories

The two housing trajectories included in this Background Evidence Document indicate how it is intended to deliver the minimum target of 2797-2947 dwellings over the plan period 2011-2031 (equating to 140-147 dwellings per annum). They indicate the likely delivery rates and phasing of the potential strategic allocations and broad location although these may be subject to change as the Adur Local Plan progresses. They are included for indicative purposes only at this stage.

Indicative housing trajectory – delivering 140 dwellings per year

	Projected Completions																			Totals	
	2011/2012	2012/2013	2013/2014	2014/2015	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030		2030/2031
Completions (large and small sites) To be updated to reflect the 2012/2013 monitoring period		160	83	106	54	22	0	13	0	0	0	0	0	0	0	0	0	0	0	0	438
Non allocated sites (SHLAA sites) To be updated to reflect the SHLAA 2013 following consultation		0	0	96	146	41	6	0	0	0	0	0	0	0	0	0	0	0	0	0	289
Broad Location (Shoreham Harbour)						95	95	95	95	95	96	96	96	96	96	46	48				1050
Strategic Allocation (New Monks Farm)						60	60	60	60	60	60	60	30								450
Strategic Allocation (Sompting South and North)						40	40	40	40	40	40	40	40	40	40	40	40				480
Total Past Completions	204																				204
Total Projected Completions	204	160	83	202	200	258	201	208	195	195	196	196	166	136	136	86	88	0	0	0	2910
Estimated losses	11	0	0	1	0	3	0	3	0	0	0	0	0	0	0	0	0	0	0	0	18
Past net completions	193																				193
Projected net completions		160	83	201	200	255	201	205	195	195	196	196	166	136	136	86	88	0	0	0	2699
Cumulative net completions	193	353	436	637	837	1092	1293	1498	1693	1888	2084	2280	2446	2582	2718	2804	2892	2892	2892	2892	2892
Plan. Annualised net strategic allocation	140	140	140	140	140	140	140	140	140	140	140	140	140	140	140	140	140	140	140	140	2800
Monitor. Position above/below zero indicates how many dwellings above or below the cumulative allocation at any point in time	53	73	16	77	137	252	313	378	433	488	544	600	626	622	618	564	512	372	232	92	
Manage. Annual requirement taking into account past/projected completions	140	137	136	139	135	131	122	116	109	101	91	80	65	51	36	16	-1	-31	-46	-92	

Notes

Completions include sites with planning permission but which have not commenced and sites on which development has commenced. Large sites comprise 6 or more units, small sites comprise 5 or less units.

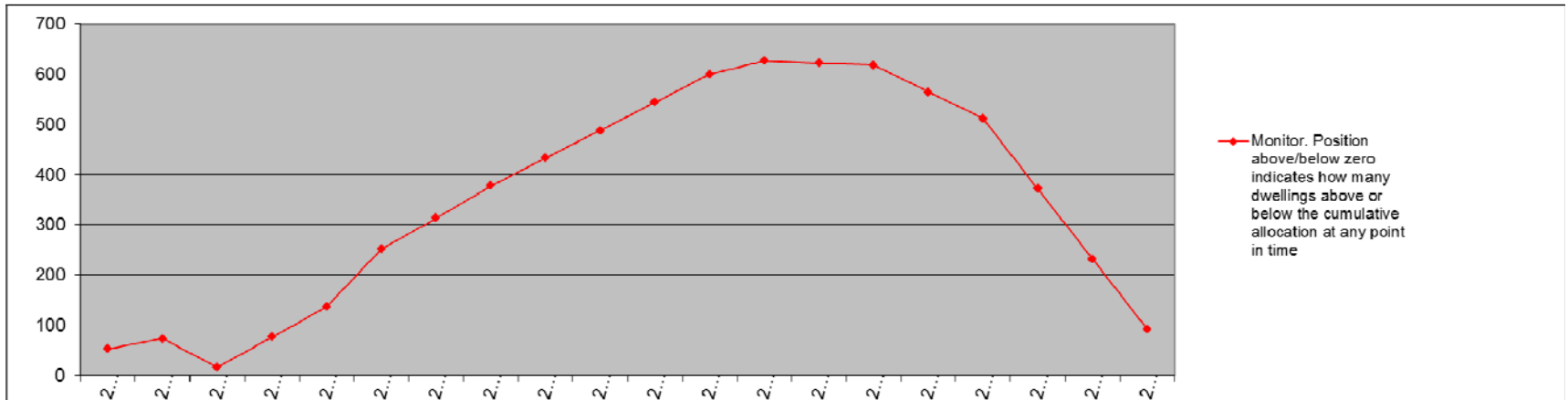
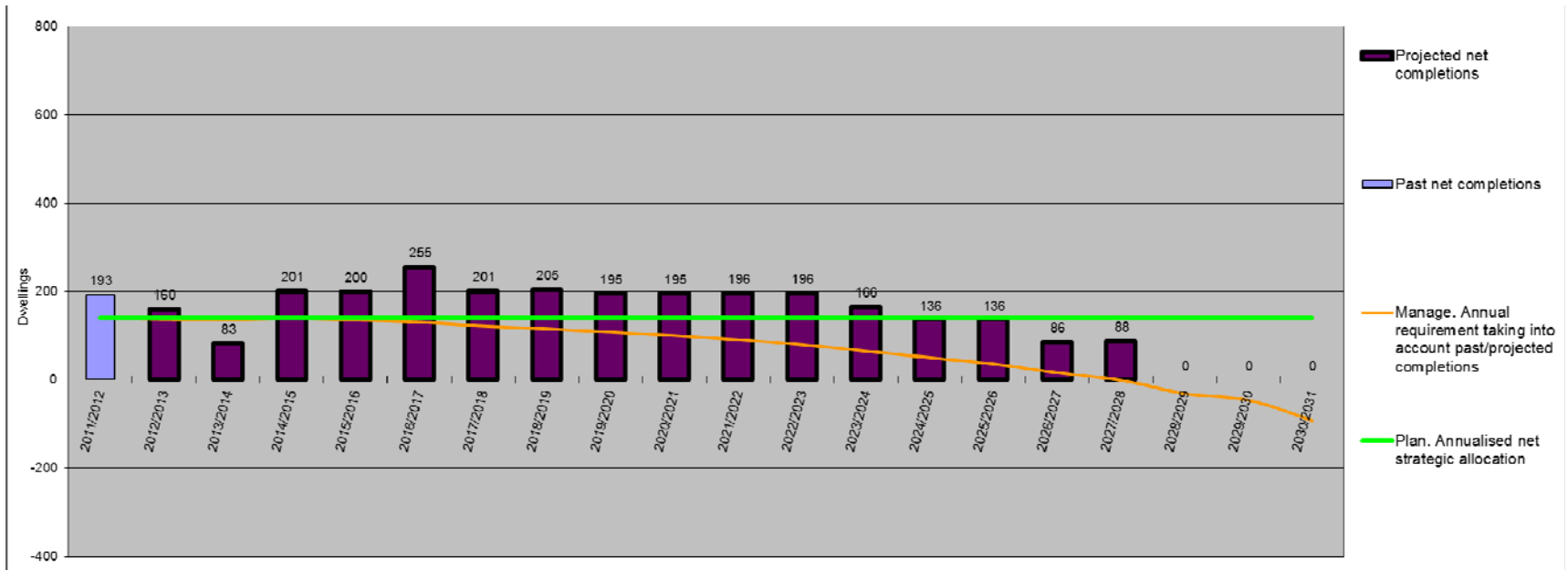
Non allocated sites are those identified in the Strategic Housing Land Availability Assessment (update September 2012) but have not been identified through the plan making process

Estimated losses include actual and projected losses that may occur due to demolition, conversion and change of use. Deducting estimated housing losses from gross housing completion figures gives net completions.

Source: 2012 Residential Land Availability Survey, WSCC. To view source data search WSCC planning data for Housing and Residential Land in West Sussex.

This trajectory will be revised to reflect the most recent data, for the Submission version of the Adur Local Plan.

Aug-13



Indicative housing trajectory – delivering 147 dwellings per year

						Projected Completions															Totals
	2011/2012	2012/2013	2013/2014	2014/2015	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	
Completions (large and small sites) To be updated to reflect the 2012/2013 monitoring period		160	83	106	54	22	0	13	0	0	0	0	0	0	0	0	0	0	0	0	438
Non allocated sites (SHLAA sites) To be updated to reflect the SHLAA 2013 following consultation		0	0	96	146	41	6	0	0	0	0	0	0	0	0	0	0	0	0	0	289
Broad Location (Shoreham Harbour)						95	95	95	95	95	96	96	96	96	96	46	48	0	0	0	1050
Strategic Allocation (New Monks Farm)						80	80	80	80	80	80	80	40								600
Strategic Allocation (Sompting South and North)						40	40	40	40	40	40	40	40	40	40	40					480
Total Past Completions	204																				204
Total Projected Completions		160	83	202	200	278	221	228	215	215	216	216	176	136	136	86	88	0	0	0	2856
Estimated losses	11	0	0	1	0	3	0	3	0	0	0	0	0	0	0	0	0	0	0	0	18
Past net completions	193																				193
Projected net completions		160	83	201	200	275	221	225	215	215	216	216	176	136	136	86	88	0	0	0	2849
Cumulative net completions	193	353	436	637	837	1112	1333	1558	1773	1988	2204	2420	2596	2732	2868	2954	3042	3042	3042	3042	3042
Plan. Annualised net strategic allocation		147	147	147	147	147	147	147	147	147	147	147	147	147	147	147	147	147	147	147	2940
Monitor. Position above/below zero indicates how many dwellings above or below the cumulative allocation at any point in time		46	59	-5	49	102	230	304	382	450	518	587	656	685	674	663	602	543	396	249	102
Manage. Annual requirement taking into account past/projected completions		147	145	144	147	144	140	131	124	115	106	95	82	65	49	35	14	-4	-34	-51	-102

Notes

Completions include sites with planning permission but which have not commenced and sites on which development has commenced. Large sites comprise 6 or more units, small sites comprise 5 or less units.

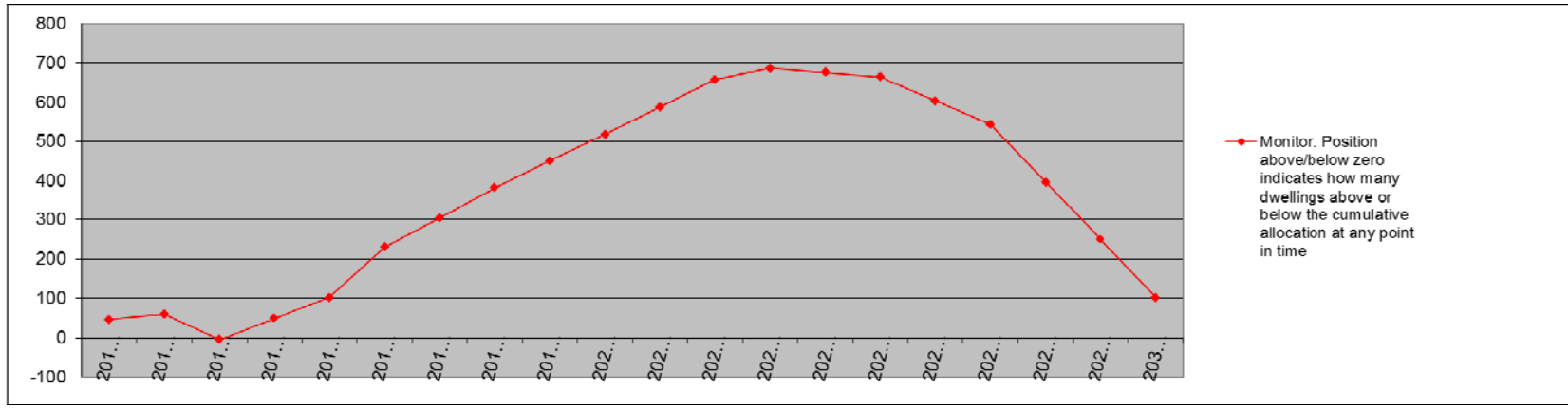
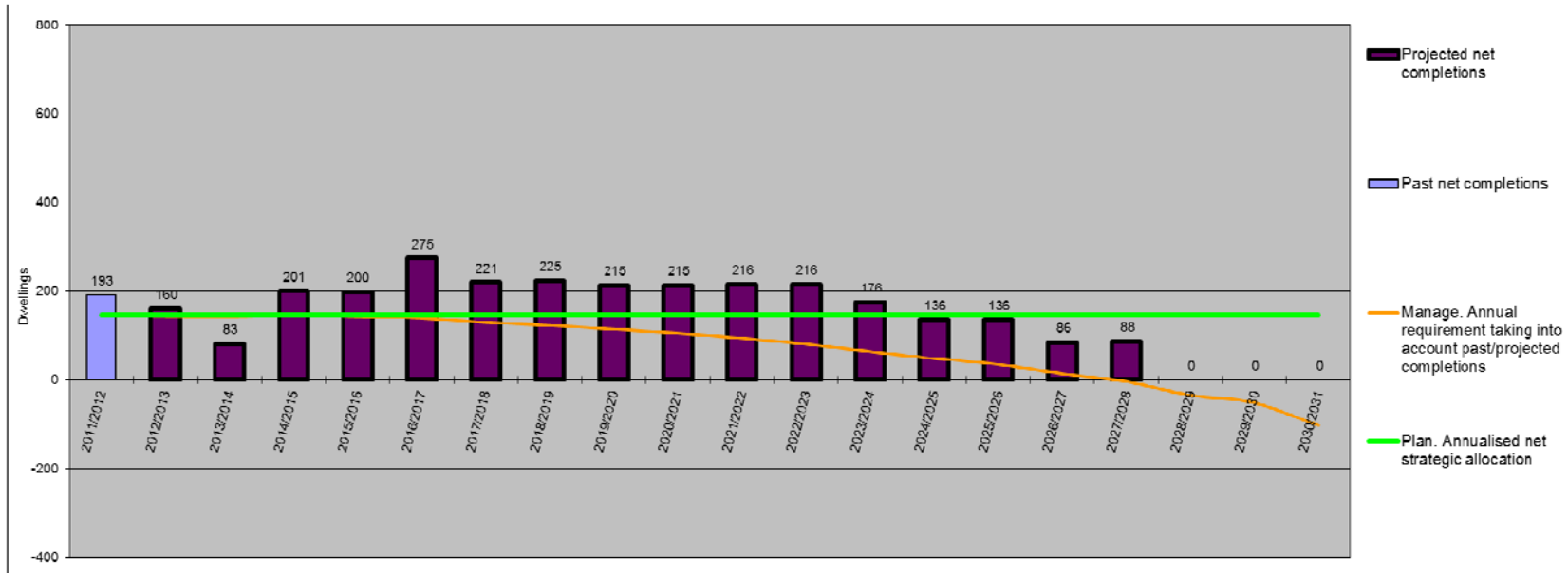
Non allocated sites are those identified in the Strategic Housing Land Availability Assessment (update September 2012) but have not been identified through the plan making process

Estimated losses include actual and projected losses that may occur due to demolition, conversion and change of use. Deducting estimated housing losses from gross housing completion figures gives net completions.

Source: 2012 Residential Land Availability Survey, WSCC. To view source data search WSCC planning data for Housing and Residential Land in West Sussex.

This trajectory will be updated to reflect the most recent data, for the Submission version of the Adur Local Plan.

Aug-13



EVIDENCE TO SUPPORT REVISED DRAFT POLICY 22: DENSITY

Please note that the data in this report will be updated for the Submission version of the Local Plan

Given the physical and environmental constraints in Adur, land suitable for development is a scarce resource in the district. There are competing demands for its use and it is important that the limited amount of previously developed land is used efficiently when considering proposals for new residential development.

The South East Plan, adopted in 2009 contained Policy H5 which set an overall regional target of 40 dwellings per hectare. PPS3: Housing also encouraged higher densities on sites before it was replaced by the National Planning Policy Framework, which allows local planning authorities to set their own density targets.

It is therefore considered appropriate, in line with the National Planning Policy Framework, that the Local Plan should contain a density policy. In setting a minimum density for development the following sources of information were used:

A sample of densities within the existing built up area of the district

The density of a number of areas within the built-up area of Adur was calculated. The areas were chosen as a representative sample of the overall character of Adur, including Conservation Areas and areas where particular house types dominate (Table 1). Evidence from the Strategic Housing Market Assessment (2009) indicates that in Adur the housing stock is focused towards semi-detached housing, which impacts on density. The average density of development in Adur is 24 dwellings per hectare.

Table 1: Sample of densities within the existing built up area

Site location	Hectares	Dwellings (net)	dph	Description
North Sompting	7.8	165	21	Semi detached houses and bungalows
Loose Lane area, Sompting	10.5	361	34.4	Semi detached/terraced houses and flats
Ullswater Road/Western Road, Sompting	3.35	69	20.6	Bungalows/semi detached houses
Addison Close, Lancing	2.4	88	36.6	Semi detached/terraced houses
Mash Barn, Lancing	7.4	260	35	Terraced houses and flats
North Lancing Conservation Area	9.76	140	14.3	Detached houses
Central Lancing (Lancing Close, Wembley Avenue, Elms Drive)	4.38	120	27.4	Detached/semi/terraced houses and flats
Hasler Estate, Lancing	8.3	227	27.4	Semi detached houses

				and bungalows
Shoreham Beach (west)	6.5	131	20.2	Detached houses and flats
Shoreham Beach (east)	9.5	161	17	Detached/semi/terraced houses
Central Shoreham (Upper Shoreham Road, Fairfield Close, Hammy Close, Hammy Lane, Wilmot Road)	6.0	150	25	Semi detached houses
North A270, Shoreham	9.8	223	23	Detached/semi detached houses
North Shoreham Conservation Area	5.24	61	12	Detached houses
Mile Oak, Southwick	9.4	232	25	Detached/semi detached houses
Central Southwick	10.8	228	21	Semi detached houses

West Sussex County Council Monitoring Information

West Sussex County Council produces annual monitoring information for Adur District. Table 2 shows how many sites came forward and the number of dwellings accommodated on each site between 2006 and 2011. It indicates that the majority of sites coming forward are for the redevelopment of smaller sites of one and two dwellings. Table 3 indicates that sites of 1-9 units have an average density of approximately 44 dph, with larger sites of 10+ units have a higher density of 72dph. Overall, new development averages approximately 60 dph and reflects the efficient use of land and the fact that more flats have been built in recent years.

Table 2: Dwelling numbers on sites²

Commitment at:	Dwelling numbers on sites (net)															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16+
1 April 2006	56	26	10	6	2	3	2	1	0	2	1	0	0	0	0	8
1 April 2007	12	4	0	4	2	0	0	2	0	1	0	0	0	0	0	0
1 April 2008	10	7	1	1	2	2	0	0	0	1	0	0	0	0	0	1
1 April 2009 ³	12	29	2	3	3	3	1	2	3	7	0	2	0	1	1	13
1 April 2010	16	9	1	1	2	0	0	0	0	0	0	0	0	0	0	1
1 April 2011	9	3	1	4	1	0	0	0	0	0	0	0	0	0	1	1
Total number of sites 1/4/2006 – 1/4/2011	115	78	15	19	12	8	3	5	3	11	1	2	0	1	2	24

² WSCC Residential Land Availability Data

³ Includes sites identified in the Strategic Housing Land Availability Assessment 2009

Table 3: Density of Development⁴(dwellings per hectare)

	1-9 units	10+ units	All units
2006/2007	40.0	67.7	57.6
2007/2008	28.5	61.9	48.6
2008/2009	48.3	78.9	62.0
2009/2010	44.9	67.7	64.0
2010/2011	59.8	83.9	67.7
Average	44.3	72	60

Large developments completed in Adur since 2008

Looking more specifically at individual large sites (of six or more dwellings) that have been developed in the last few years, Table 4 indicates that the average density of such developments is 109 dph. The majority of these sites have been developed with a mix of houses and flats mainly in response to market conditions and making the best and most efficient use of land. The higher development densities are not necessarily in town centres as might be expected but are located throughout Adur.

Table 4: Large developments completed since 2008⁵

Site location	Hectares	Dwellings (net)	dph	Description
Sussex Wharf, Shoreham Beach	3.67	235	84	Flats and Houses
Shadwells Road, Lancing	0.10	6	55	2 and 3 bed houses
West Lane, Lancing	0.26	10	39	Houses
Former St Giles Centre, Elm Grove, Lancing	0.18	26	144	Mix of 2,3 bed houses, 2 bed bungalows and 2 bed flats
Kingston Works, Gardner Road, Southwick	0.4	40	100	Mix of 2 bed flats and 3 bed houses
Land west of Penncroft, Elm Grove, Lancing	0.06	6	105	Mix of bedsits and 1 bed flat
Royal Naval Association	0.07	9	129	1 and 2 bed flats
Burdwood House, Brighton Road, Lancing	0.21	20	95	1,2,3 bed flats and 1 bed bungalows
Ballamys, Ropetackle, Shoreham	0.21	48	229	1,2,3 bed flats

⁴ WSCC Residential Land Availability Data

⁵ WSCC Residential Land Availability Data

Large sites with planning permission/under construction at 31st March 2011

It is also appropriate to look at those sites which currently have planning permission but on which development has not yet commenced and those sites where development is under construction (Table 5). This indicates an average density of 80 dwellings per hectare. This is still quite high in relation to Adur as a whole although the trend does appear to be moving towards the development of houses rather than flats. This reflects both current market conditions and the evidence in the Strategic Housing Market Assessment which expects demand for market housing to be focused towards two and three bed dwellings.

Table 5: Large sites with planning permission/under construction at 31st March 2012⁶

Site location	Hectares	Dwellings (net)	dph	Description
Kingdom Hall, Wembley Gardens, Lancing	0.05	6	120	1 bed houses
Ardmore Nursery School	0.12	9	70	1,2 bed terraced houses
Luxor Cinema	0.06	6	100	Flats
Rotary House	0.26	25	96	Flats
79/81 Brighton Road, Shoreham	0.06	79	132	Flats
3-15 New Road, Shoreham	0.15	11	73	Flats and houses
Southlands Hospital, Shoreham	1.86	197	53	Flats and houses (part of mixed use)
60-66 Busticle Lane Sompting	0.08	8	100	Flats
Former Dairy, 96 Southview Road, Southwick	0.21	14	67	Flats
Windmill Inn, 180 Old Shoreham Road, Shoreham		13	82	3 bed houses and 1,2 bed flats
SE/SW Britannia Avenue, Shoreham	0.31	20	65	Mix of 2,3,4, bedroom houses
The Ball Tree Inn, Busticle Lane, Sompting	0.24	10	42	Mix of 2,3,4,bed houses and 3 bed bungalow
The Willows School, Irene Avenue, Lancing	0.63	23	35.5	Mix of 2,3,4 bed houses, 2 bed bungalows and 1 bed flats

Conclusion

In setting a minimum density target for the district, the above evidence was taken into account. It is considered that requiring new development to have a minimum density of 35 dwellings per hectare is appropriate. This takes into account of the current average density of the built up area (at 24dph) and the

⁶ WSCC Residential Land Availability Data

average density of all new development since 2006 (at 60dph). The evidence suggests that recent development on the larger sites has been considerably higher (particularly in town centre locations where you would expect this to be the case). Revised Draft Policy 22 recognises that higher development densities will be expected in the defined town/village centres. It also recognises that in exceptional cases a lower density might be acceptable if it can be demonstrated that meeting the minimum density of 35dph would result in an unacceptable impact on the surrounding area.

**BACKGROUND EVIDENCE TABLE FOR REVISED DRAFT ADUR
LOCAL PLAN DEVELOPMENT MANAGEMENT POLICIES (RDP14
TO RDP37)**

Revised Draft Policy 14: Quality of the Built Environment and Public Realm.	
National Planning Context/ legal context	The NPPF section on design refers to the need to plan positively for the achievement of high quality and inclusive design for all development. A range of objectives for planning policies are given. These include: responding to local character creating safe and accessible environments, and ensuring that developments function well and add to the overall quality of the area, for the lifetime of the development. Design policies should not be overly descriptive. Advice regarding advertisements is also given; advertisements should be subject to control only in the interests of public safety and amenity, taking account of cumulative impacts.
Any other 'wider than local' policy/ proposals/ evidence documents?	Range of best practice documents available. These include: By Design (DETR/CABE) Building in Context Toolkit (CABE) Safer Places (Home Office/ ODPM)
Local evidence/ policy, etc	Adur and Worthing Public Art Strategy (2009) Adur District Character Study, Tibbalds, June 2009.
Council Priorities	A mixed economy of partnership working – Priority 2: work more closely with and commission our communities, the voluntary sector, public organisations, businesses and commercial sectors to reduce crime, fear of crime, anti- social behaviour. Supporting and improving the local economy – Priority 3: Support high quality developments.
Will this policy replace a saved policy/ policies of the Adur Local Plan? If so, which?	AP - Visual Pollution AB17 - Controlling Advertisements. AB20, AB21- Shopfronts AB27 - Landscaping AB30 - Crime Prevention AT4 - The North Side of the Harbour and Shoreham Beach AH2 - Infill and Development AH7 - Householder Proposals

	AH9 - Flat Conversions
Revised Draft Policy 15: A Strategic Approach to the Historic Environment	
Revised Draft Policy 16: The Historic Environment	
National Planning Context/ legal context	The NPPF states that Local Plans should set out a positive strategy for the conservation and enjoyment of the historic environment including heritage assets most at risk through neglect, decay or other threats. Local Planning Authorities should look for opportunities for new development within conservation areas and within the setting of heritage assets to enhance or better reveal their significance. Local Authorities should have up-to-date evidence about the historic environment in their area and use it to assess the significance of heritage assets and the contribution they make to their environment.
Local evidence/ policy, etc	West Sussex County Council's Historic Land Classification information for Adur. Shoreham Historic Character Assessment Report (Sussex Extensive Urban Survey) RB Harris. January 2009 Conservation Character Area Appraisals and Management Strategies for Shoreham-by-Sea, Southlands and Southwick
Council Priorities	Not directly related
Will this policy replace a saved policy/ policies of the Adur Local Plan? If so, which?	AB1 - Archaeology AB3,4,5,and 6 - Conservation Areas and their Enhancement AB7,8,9,10,11 - Listed Buildings AB19 - Advertisements in Conservation Areas

Revised Draft Policy 17: The Energy Hierarchy	
National Planning Context/ legal context	The NPPF states that Local Planning Authorities should adopt proactive strategies to mitigate and adapt to climate change by planning for new development in locations and ways which reduce greenhouse gas emissions, actively supporting energy efficient improvements to existing buildings and include policies consistent with the Governments zero carbon buildings policy and adopt nationally described standards
Other 'wider than local' policy/ proposals/ evidence documents	
Local evidence/ policy, etc	<p>Adur District Council Energy Study 2009 – this study considered the opportunities for delivering energy efficient buildings as well as the potential for low carbon/ renewable energy development within the District. The study paid specific attention to the developments at Shoreham Harbour as well as the strategic sites being investigated through the Local Plan.</p> <p>The study highlighted the benefits of following a CO2 reduction approach for new development set within a hierarchy of demand reduction, efficient energy supply and renewable energy provision (the 'be lean, be clean, be green' hierarchy). Through this approach developers are incentivized to adopt sensible demand reduction measures (e.g. energy efficiency measures such as high levels of insulation) and are rewarded for installing clean supply technologies (e.g. more efficient energy production such as using CHP) with a reduced renewables target.</p>
Council Priorities	Priority 3: Supporting and improving the local economy – Support high quality development.
Will this policy replace a saved policy/ policies of the Adur Local Plan? If so, which?	New policy

Revised Draft Policy 18: Sustainable Design	
National Planning Context/ legal context	<p>One of the core planning principles of the NPPF is to support the transition to a low carbon future by encouraging the use of renewable resources.</p> <p>Local planning authorities should actively support energy efficiency improvements to existing buildings and when setting policies for sustainable buildings these must be consistent with the Government's zero carbon buildings policy and adopt nationally prescribed standards.</p>
Other 'wider than local' policy/ proposals/ evidence documents	<p>Both the Worthing Chalk and Brighton Chalk Water Resource Management Units (water sources which serve Adur District) are classified as having 'no water available' for further licensing of abstraction at low flows (although water may be available at higher flows with appropriate restrictions (see The Adur and Ouse Catchment Abstraction Management Strategy and The Arun and Western Streams Catchment Abstraction Management Strategy). Additionally, the Environment Agency have highlighted Adur as falling within an area of serious water stress (the highest category for water stress) where there is the greatest need to target water efficiency measures, this will include domestic and non-domestic development (See Water Resources in England and Wales – current state and future pressures, EA).</p> <p>As a means of ensuring higher levels of sustainability in new domestic development, the Code for Sustainable Homes outlines a set of sustainable design criteria covering performance in nine key areas listed below:</p> <ul style="list-style-type: none"> Energy and CO2 Emissions Water Materials Surface Water Run-off Waste Pollution Health and Wellbeing Management Ecology

	<p>The Code has six levels (1-6) with increasingly more stringent mandatory requirements for the categories within each code level. Two of these categories, CO2 emissions and water consumption, are mandatory standards that must be met for rating against the Code. In addition, both of these categories also have minimum standards attached to them at each Code level that need to be met before any rating can be achieved.</p> <p>Building Research Establishment Environmental Assessment Method (BREEAM) BREEAM is a performance based assessment method and certification scheme for new buildings. The primary aim of BREEAM is to mitigate the life cycle impacts of new buildings on the environment. It assesses new and converted developments based on 10 sustainability criteria covering:</p> <ul style="list-style-type: none"> Energy Water Waste Transport Materials Land Use and Ecology Pollution Management Health and Wellbeing Innovation <p>Buildings are rated and certified on a scale of 'Pass', 'Good', 'Very Good', 'Excellent' and 'Outstanding'.</p>
<p>Local evidence/ policy, etc</p>	<p>Adur District Council Energy Study 2009 – this study considered the opportunities for delivering energy efficient buildings as well as the potential for low carbon / renewable energy development within the District. The study paid specific attention to the developments at Shoreham Harbour as well as the strategic sites being investigated through the Local Plan. The study suggested that higher levels of carbon emission reductions could potentially be achieved in the district in advance of the reductions</p>

	<p>outlined in the 'Building a Greener Future' document. This amounted to an increase in renewable energy production in new development (outside of the Harbour Regeneration area) than those levels outlined in the governments proposed changes to building regulations. The study suggested that the cost burden to the developer would not be excessive. However, in the absence of any study that takes a more holistic view of development viability, it is considered that any renewable energy target that goes beyond the proposed reductions of emissions through building regulations should not be included in the Local Plan.</p> <p>Adur & Worthing Councils Sustainability Strategy 2010</p>
Council Priorities	Priority 3: Supporting and improving the local economy – support high quality development.
Will this policy replace a saved policy/ policies of the Adur Local Plan? If so, which?	New policy

Revised Draft Policy 19: Decentralised Energy and Stand-alone Energy Schemes	
National Planning Context/ legal context	The NPPF states that local planning authorities should adopt proactive strategies to mitigate and adapt to climate change. They should identify opportunities where development can draw its energy supplies from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers. They should also plan for new development in locations and ways which reduce greenhouse gas emissions and have a positive strategy to promote energy from renewable and low carbon sources.
Other 'wider than local' policy/ proposals/ evidence documents	
Local evidence/ policy, etc	Adur District Council Energy Study 2009 – this study considered the opportunities for delivering energy efficient buildings as well as the potential for low carbon / renewable energy development within the District. The study paid specific attention to the developments at Shoreham Harbour as well as the strategic sites being investigated through the Local Plan. The study recommended that a policy in the Local Plan be developed which supported standalone renewable energy schemes and is essentially replicated here. This is to ensure that there is an option for developers to deliver an 'allowable solution' in the form of offsite renewable energy, as well as ensuring that any speculative energy development is sensitively located. Adur & Worthing Councils Sustainability Strategy 2010
Council Priorities	Not directly related
Will this policy replace a saved policy/ policies of the Adur Local Plan? If so, which?	Policy AP6 Renewable Energy

Revised Draft Policy 20: Housing Mix and Quality	
National Planning Context/ legal context	<p>NPPF states that Local Planning Authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community; identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.</p> <p>Local Planning Authorities should have a clear understanding of housing needs in their area. They should prepare a Strategic Market Housing Assessment (SHMA) to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The SHMA should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period, which meets household and population projections, taking account of migration and demographic change, addresses the need for all types of housing, and caters for housing demand and the scale of housing supply necessary to meet this demand.</p> <p>Local Planning Authorities should also prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.</p>
Any other 'wider than local' policy/ proposals/ evidence documents?	-
Local evidence/ policy, etc	The Coastal West Sussex Strategic Housing Market Assessment Update 2012 (SHMA) advises on appropriate mix, size and type of both private and affordable housing.
Council Priorities	Supporting and improving the local economy – Priority 3: Support high quality development.
Will this policy replace a saved policy/ policies of the Adur Local Plan? If so, which?	<p>AH5 – Dwelling Size</p> <p>AH6 – Loss of Dwellings</p> <p>AH9 – Flat Conversions</p>

Revised Draft Policy 21: Affordable Housing	
National Planning Context/ legal context	The NPPF states that Local Plans should meet the full, objectively assessed needs for market and affordable housing in the housing market area. A housing trajectory should be used to demonstrate the delivery of market and affordable housing. Where affordable housing is needed, this need should be met on-site unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified, and the agreed approach contributes to the objective of creating mixed and balanced communities.
Any other 'wider than local' policy/ proposals/ evidence documents?	Various best practice documents/housing strategy statements
Local evidence/ policy, etc	The Coastal West Sussex Strategic Housing Market Assessment Update (2012) indicates that specific policy targets for affordable housing should be informed by an economic viability assessment. Emerging evidence from the Community Infrastructure Levy and Affordable Housing Viability Study indicates that the current threshold of 15 dwellings can be lowered without adversely affecting viability. The Strategic Housing Land Availability Assessment (updated in 2012) identifies brownfield sites for future residential development. The size of sites coming forward, together with the viability study provides evidence to inform local site size thresholds The Adur and Worthing Housing Strategy Statement 2011-2016 sets a target of 50 new affordable homes to be delivered annually in Adur and this is reflected in the Local Plan
Council Priorities	Supporting and improving the local economy – Priority 2: Enable new homes to be built to help meet the housing needs of our communities.
Will this policy replace a saved policy/ policies of the Adur Local Plan? If so, which?	Policy AH3 – Housing to Meet Local Need

Revised Draft Policy 22: Density	
National Planning Context/ legal context	The NPPF allows local authorities to set out their own approach to residential density to reflect local circumstances.
Any other 'wider than local' policy/ proposals/ evidence documents?	-
Local evidence/ policy, etc	West Sussex County Council monitoring information together with local density work helps to support this policy (see elsewhere in this Background Evidence Document)
Council Priorities	Supporting and improving the local economy – Priority 3: Support high quality development.
Will this policy replace a saved policy/ policies of the Adur Local Plan? If so, which?	New policy

Revised Draft Policy 23: Provision for Gypsies, Travellers and Travelling Showpeople	
National Planning Context/ legal context	“Planning Policy for Traveller Sites” published in March 2012 by CLG (and to be read in conjunction with the NPPF) enables local planning authorities to make their own assessment to set robust pitch/plot targets and encourages local authorities to plan for sites over a reasonable timescale (a five year housing land supply is required). The Housing Act 2004 also requires that Gypsies and Travellers be included in accommodation needs assessments.
Any other ‘wider than local’ policy/ proposals/ evidence documents?	-
Local evidence/ policy, etc	In line with current policy a Gypsy, Traveller and Travelling Showpeople Accommodation Assessment covering the Coastal West Sussex local authority areas of Adur, Worthing, Arun and Chichester and that part of the South Downs National Park falling within the districts/borough has been undertaken. Phase 1 of the study (completed April 2013) assessed housing needs and its findings used to inform this policy. Phase 2 is nearing completion and considers potential sites for Gypsy, Travellers and Travelling Showpeople
Council Priorities	Supporting and improving the local economy – Priority 2: Enable new homes to be built to help meet the housing needs of our communities.
Will this policy replace a saved policy/ policies of the Adur Local Plan? If so, which?	New Policy

Revised Draft Policy 24: Safeguarding Existing Gypsy and Traveller and Travelling Showpeople Sites	
National Planning Context/ legal context	“Planning Policy for Traveller Sites” published in March 2012 by CLG (and to be read in conjunction with the NPPF) enables local planning authorities to make their own assessment to set robust pitch/plot targets and encourages local authorities to plan for sites over a reasonable timescale (a five year housing land supply is required). The Housing Act 2004 also requires that gypsies and travellers be included in accommodation needs assessments.
Any other ‘wider than local’ policy/ proposals/ evidence documents?	-
Local evidence/ policy, etc	In line with current policy a Gypsy, Traveller and Travelling Showpeople Accommodation Assessment covering the Coastal West Sussex local authority areas of Adur, Worthing, Arun and Chichester and that part of the South Downs National Park falling within the districts/borough has been undertaken. Phase 1 of the study (completed April 2013) assessed housing needs and its findings used to inform this policy. Phase 2 is nearing completion and considers potential sites for Gypsy, Travellers and Travelling Showpeople
Council Priorities	Not directly relevant
Does this policy replace a saved policy/ policies of the Adur Local Plan? If so, which?	New Policy

Revised Draft Policy 25: Protecting and Enhancing Existing Employment Sites and Premises	
National Planning Context/ legal context	<p>National Planning Policy Framework (NPPF) The NPPF states that local planning authorities should:</p> <ul style="list-style-type: none"> • set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth • set criteria, or identify strategic sites for local inward investment • support existing business sectors taking account of whether they are expanding or contracting • facilitate flexible working practices such as the integration of residential and commercial uses within the same unit
Any other ‘wider than local’ policy/ proposals/ evidence documents?	<p>The West Sussex Economic Strategy 2012-2020 This strategy is led by West Sussex County Council and sets out a high-level approach to supporting sustainable growth in the county. Key elements of this strategy include the need to ensure the best use of land and property to support a sustainable economy.</p> <p>City Deal The greater Brighton Region has been successful in its City Deal application which aims to prioritise economic growth supporting the Coast to Capital LEP’s Growth Strategy and the Government’s Plan for growth.</p>
Local evidence/ policy, etc	<p>Adur Employment Land Review (ELR) 2011: concluded that in light of the short supply of employment land within the district and the general low level of vacancies of employment units in the district, the release of any sites for alternative uses is not recommended.</p>
Council Priorities	<p>Priority 1: Supporting and improving the local economy – Promote and support projects and ideas that attract new and retain existing businesses, and generate investment in the area.</p>
Will this policy replace a saved policy/ policies of the Adur Local Plan 1996? If so, which?	<p>AE2 - Redevelopment Opportunities AE4 - Mixed Development</p>

Revised Draft Policy 26: The Visitor Economy	
National Planning Context/ legal context	The NPPF states that the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres should be supported. Local Planning Authorities should allocate suitable sites in town centres for a range of uses, include tourism.
Any other 'wider than local' policy/ proposals/ evidence documents?	Good Practice Guide on Planning for Tourism – CLG 2006
Local evidence/ policy, etc	<p>The Economic Impact of Tourism in Adur 2011 This study assessed the levels of tourism in Adur and concluded that most visits to the district were day visits (876,000) and the majority of these visitors were visiting friends and family. Nevertheless, tourism makes a significant contribution to the economy creating a £55,000,000 turnover for local businesses with 5% of all jobs in the district supported by tourism expenditure.</p> <p>Hotel and Visitor Accommodation Futures</p> <p>This study concluded that there is a shortage of hotel accommodation in Shoreham-By-Sea to service the accommodation needs of local companies. Corporate business is currently being lost to Brighton. Corporate demand for hotel and guesthouse accommodation is also likely to grow if planned development takes place at Shoreham Airport and Shoreham Harbour.</p> <p>The study also stated that there could be some scope for hotels and guesthouses in Shoreham-By-Sea to develop leisure break business, primarily as a base for visiting Brighton. Demand is likely to be primarily for one night stays on Saturday nights although Shoreham-By-Sea is unlikely to develop as a leisure break destination in its own right.</p>
Council Priorities	Supporting and improving the local economy – Priority 1: Support and promote projects and ideas that attract new and retain existing businesses, and generate investment in the area.
Does this policy replace a saved policy/ policies of the Adur Local Plan? If so, which?	AR20 - Tourism

Revised Draft Policy 27: Retail, Town Centres and Local Parades	
<p>National Planning Context/ legal context</p>	<p>The NPPF states that policies should be positive, promote competitive town centre environments and local planning authorities should:</p> <ul style="list-style-type: none"> • Recognise town centres as the heart of their communities and pursue policies to support their viability and vitality • Define a hierarchy and network of centres • Define the extent of the town centre and the primary shopping area based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations • Recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites • Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, community services and residential development needed in town centres. It is important that retail and leisure needs are met in full and not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites • Allocate appropriate edge of centre sites where suitable and viable town centre sites are not available, and if sufficient edge of centre sites cannot be identified, set policies for meeting the identified requirements in other accessible locations; and • Set policies for the consideration of retail and leisure proposals which cannot be accommodated in or adjacent to town centres <p>Local planning authorities should apply a sequential approach to planning applications for retail and leisure uses that are not in existing centres and are not in accordance with an up to date Local Plan.</p> <p>Local planning authorities should prefer applications for retail and leisure uses to be located in town centres where practical, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. In applying</p>

	<p>this sequential approach, local planning authorities should ensure that potential sites are assessed for their availability, suitability and viability and for their ability to meet the full extent of assessed quantitative and qualitative needs.</p> <p>When assessing applications for retail and leisure development outside of town centres, which are not in accordance with an up to date Local Plan, local planning authorities should require an impact assessment if the development is over a proportionate locally set floorspace threshold. If there is no locally set threshold, the default threshold is 2,500sqm. Planning policies and decisions should assess the impact of retail and leisure proposals, including:</p> <ul style="list-style-type: none"> • The impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and • The impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to ten years from the time the application is made. <p>PPS4 Practice Guidance on Need, Impact and the Sequential Approach</p>
<p>Any other 'wider than local' policy/ proposals/ evidence documents?</p>	<p>N/A</p>
<p>Local evidence/ policy, etc</p>	<p>Adur Retail Study Update (2009) This study carried out a health check of Shoreham, Lancing and Southwick town centres, assessed a quantitative need for retail development, and developed a retail strategy for the district.</p> <p>This study identified the following convenience goods capacity at centres within Adur up to 2026: Shoreham Town Centre: 250sqm Holmbush Centre: 1800sqm Lancing Town Centre: 550sqm Southwick Town Centre: 150sqm</p> <p>The study also identified the following comparison goods capacity at centres within Adur up to 2026: Shoreham Town Centre: 2700sqm Holmbush Centre: 10,050sqm</p>

	<p>Lancing Town Centre: 1700sqm Southwick Town Centre: 1,100sqm</p> <p>The study recommended that the retail capacity at the Holmbush Centre should be directed to the town centres where possible and that Shoreham-By-Sea would benefit from a new supermarket trading in or on the edge of the town centre.</p> <p>The 2009 Adur Retail Study is currently being updated and this update will be completed later on this year.</p> <p>Retail Report for Adur's Town Centres (2012) This study recommended town centre boundaries and primary and shopping frontages for Shoreham-By-Sea, Lancing and Southwick town centres. The study also divided the frontages into blocks and identified appropriate uses for each of the blocks/frontages. These recommended boundaries and frontages have been incorporated into the Revised Draft Local Plan 2013.</p> <p>Specifications for Retail Assessments in Adur (2012) This document sets out the approach for undertaking Sequential Tests and Retail Impact Forecasts for new retail development in Adur. This is to ensure consistency in applications for retail development. This study also recommended that a threshold of 1000sqm be applied for application of the Retail Impact Assessment.</p>
Sustainable Community Strategy	Vision – ‘A Vibrant Local Economy’ Priorities for Change – ‘A Better Place to Live, Work and Enjoy’.
Council Priorities	Supporting and Improving the local economy: promote and support projects and ideas that attract new and retain existing businesses, and generate investment in the area.
Will this policy replace a saved policy/ policies of the Adur Local Plan? If so, which?	This approach will replace policies AS2, AS3, and AS4 which all relate to retail development outside the town centres.

Revised Draft Policy 28: Transport and Connectivity	
National Planning Context/ legal context	The NPPF states that transport policies play a role in facilitating sustainable growth and contributing to wider sustainability and health objectives. There should be a balance in favour of sustainable transport modes, although the Government recognises that different policies and measures will be required in different communities. Local Plans should support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. All development which generates significant amounts of movement should be supported by a Transport Statement or Transport Assessment, and should be required to provide a Travel Plan. Advice is also given on setting local parking standards.
Any other 'wider than local' policy/ proposals/ evidence documents?	Coastal West Sussex Partnership: Delivering an Employment and Infrastructure Strategy, Feb 2012.
Local evidence/ policy, etc	Shoreham Port Masterplan, West Sussex County Council Infrastructure Plans (emerging) West Sussex Local Transport Plan 2011-2026. Adur Local Plan and Shoreham Harbour Transport Study 2013
Council Priorities	Supporting and improving the local economy – Priority 1: Promote and support projects and idea that attract new and retain existing businesses, and generate investment in the area; Priority 3: support high quality developments.
Will this policy replace a saved policy/ policies of the Adur Local Plan? If so, which?	AT10 - Facilities for Pedestrians, Equestrians and Cyclists.

Revised Draft Policy 29: Delivering Infrastructure	
<p>National Planning Context/ legal context</p>	<p>National Planning Policy Framework: Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing. In drawing up Local Plans, local planning authorities should identify priority areas for infrastructure provision.</p> <p>Local Planning authorities should work with other authorities and providers to: assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health social care, education, flood risk and coastal change management, and its ability to meet forecast demands; and take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.</p> <p>Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development.</p> <p>The Local Plan should include strategic policies to deliver the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy, and the provision of health, security, community and cultural infrastructure and other local facilities. (Please note that waste, minerals and wastewater are dealt with by West Sussex County Council). Local Plans should plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of the NPPF.</p> <p>It is important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion.</p>

	The legal framework for the Community Infrastructure Levy is provided by the Community Infrastructure Levy Regulations 2010 and Community Infrastructure Levy (Amendment) Regulations 2011; Community Infrastructure Levy (Amendment) Regulations 2012, Community Infrastructure Levy (Amendment) Regulations 2013.
Other 'wider than local' policy/ proposals/ documents	The Council liaises with infrastructure providers and developers to facilitate the delivery of infrastructure.
Local evidence/policy etc	An IDP will be developed in liaison with a range of infrastructure providers, which indicates the infrastructure services and facilities required to deliver the Local Plan (as well as wider infrastructure requirements). (A draft version is available to accompany the Revised Draft Adur Local Plan 2013). A CIL charging schedule will also be developed.
Council Priorities	Supporting and Improving the local economy – Priority 2: enable new homes to be built to help meet the housing needs of our communities and Priority 3: support high quality developments
Will this policy replace a saved policy of the Adur Local Plan? If so, which?	AG3: The Relationship Between Development and the Provision of Infrastructure.

Revised Draft Policy 30: Green Infrastructure	
National Planning Context/ legal context	<p>The NPPF states that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, geological conservation interests and soils; recognising the wider benefits of ecosystem services; and minimising impacts on biodiversity and providing net gains in biodiversity where possible.</p> <p>Local planning authorities should set out a strategic approach in Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.</p> <p>Planning policies should plan for biodiversity at a landscape –scale across local authority boundaries.</p> <p>Principles are given for the conservation and enhancement of biodiversity in determining planning applications</p>
Any other ‘wider than local’ policy/ proposals/ evidence documents?	<p>Natural England’s Green Infrastructure Guidance 2009: This document defines green infrastructure, sets out its value, and provides advice on how to deliver an effective green infrastructure network.</p>
Local evidence/ policy, etc	<p>Adur District Council Open Space, Sport and Recreation Study 2005 & 2009</p> <p>This study concluded that, generally, the quantity of open space in Adur is satisfactory and that Adur has predominantly good quality and accessible open spaces. However, there are some areas in the district which fall short of the minimum provision standards for certain types of open space and there is therefore a need to address this shortfall over the plan period. The 2009 study also looked at areas where green links could be created. A new Open Space Strategy is currently being undertaken; this will include an update of the Playing Pitch Strategy and will be used to inform the pre-submission version of the Adur Local Plan.</p>

	<p>Playing Pitch Strategy This study undertook an audit of the existing playing pitches in the district and set out a number of key recommendations and priorities including protecting all existing playing pitches and using section 106 contributions to meet the needs of future residents in Adur.</p> <p>Adur District Green Infrastructure Wildlife Corridors Study This study identified areas where green links could be created and also showed how some of these links may be incorporated into the proposed development at Shoreham Harbour.</p> <p>Landscape and Ecological Surveys of Key Sites Within Adur District 2012 This study assessed the landscape quality and ecology of key sites within Adur District including New Monks, West Sompting and Shoreham Airport.</p>
Council Priorities	Supporting and improving the local economy - Priority 3: Support high quality developments
Will this policy replace a saved policy/ policies of the Adur Local Plan? If so, which?	<p>AB22 - Safeguarding amenity open space AB23-AB26 - Trees in the urban area AB27: Landscaping AR1 – AR6 - Public Open Space, Recreation Areas not owned by Adur District Council; Private playing fields, allotments; New areas of public open space and Children’s play areas. AR7 - Development of Leisure and Sporting Facilities.</p>

Revised Draft Policy 31: Biodiversity	
National Planning Context/ legal context	<p>The NPPF states that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, geological conservation interests and soils; recognising the wider benefits of ecosystem services; and minimising impacts on biodiversity and providing net gains in biodiversity where possible.</p> <p>Local planning authorities should set out a strategic approach in Local Plans planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.</p> <p>Planning policies should plan for biodiversity at a landscape – scale across local authority boundaries. Principles are given for the conservation and enhancement of biodiversity in determining planning applications</p>
Any other ‘wider than local’ policy/ proposals/ evidence documents?	Sussex Biodiversity Action Plan
Local evidence/ policy, etc	<p>Landscape and Ecological Surveys of Key Sites Within Adur District 2012 This study assessed the landscape quality and ecology of key sites within Adur District including New Monks, West Sompting and Shoreham Airport.</p>
Council Priorities	Priority 3: Supporting and Improving the local economy – Support high quality developments
Does this policy replace a saved policy/ policies of the Adur Local Plan? If so, which?	New Policy

Revised Draft Policy 32: Open Space, Recreation and Leisure	
National Planning Context/ legal context	The NPPF states that the planning system has an important role to play in facilitating social interaction and creating health, inclusive facilities. Local Plans should plan positively for the provision of recreational facilities. Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up to date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision.
Any other 'wider than local' policy/ proposals/ evidence documents?	-
Local evidence/ policy, etc	The Open Space, Sport and Recreation Study 2005, updated 2009 and the Playing Pitch Strategy 2007, set a number of local standards regarding the quality, quantity and accessibility of different open space typologies. A new Open Space Strategy is currently being undertaken; this will include an update of the Playing Pitch Strategy and will be used to inform the pre-Submission version of the Adur Local Plan.
Council Priorities	Priority 3: Supporting and improving the local economy – Support high quality design.
Does this policy replace a saved policy/ policies of the Adur Local Plan? If so, which?	AR5, AR6 – New Areas of Public Open space and Children's Play Areas. AR7 – Development of Leisure and Sporting Facilities

Revised Draft Policy 33: Planning for Sustainable Communities.

Please note that some of the issues addressed by this policy were previously included in DP30 Planning For Healthy Communities, Draft Adur Local Plan 2012. The policy has been widened to encompass social and community facilities.

<p>National Planning Context/ legal context</p>	<p>Health issues are generally addressed in the NPPF in terms of recreation and open space use – see RDP 32: Open space, recreation and Leisure for more information). The facilitation of social interaction and use of public areas are also encouraged. Paragraph 70 refers to delivery of social, recreational and cultural facilities - plans should plan positively for the provision and use of such facilities; guard against unnecessary loss ensure that established shops, facilities and services can develop in a sustainable fashion, and ensure an integrated approach to considering the location of housing, economic uses and community facilities and services. Planning policies and decisions should ensure that new development is appropriate for its location, having regard to the effects (including cumulative) of pollution on health, the natural environment or general amenity. Policies and decisions should avoid noise from giving significant adverse impacts on health and quality of life, and mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development. Planning policies should take into account the presence of Air Quality management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that new development in AQMAs is consistent with the local air quality action plan.</p>
<p>Any other 'wider than local' policy/ proposals/ evidence documents?</p>	<p>Steps to Healthy Planning, Proposals For Action, Spatial Planning and Health Group June 2011.</p>
<p>Local evidence/ policy, etc</p>	<p>The commissioning role formerly undertaken by Primary Care Trusts has now passed to Clinical</p>

	<p>Commissioning Groups.</p> <p>A Community Profile for the Adur District and Worthing Borough 2011</p> <p>Air Quality Action Plan, Adur District Council July 2007.</p>
Corporate Priorities 2013-2014	Work more closely with and commission our communities, the voluntary sector, public organisations, business and commercial sectors to develop and deliver services.
Will this policy replace a saved policy/ policies of the Adur Local Plan?	<p>ACS1 - Education</p> <p>ACS4 - Health Services.</p> <p>ACS5 - Community Services</p>

Revised Draft Policy 34: Pollution and Contamination	
National Planning Context/ legal context	<p>The NPPF states that planning policies and decisions should:</p> <ul style="list-style-type: none"> • Prevent both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution. • ensure that new development is appropriate for its location to prevent unacceptable risks from pollution and land instability; • avoid, mitigate or reduce the impacts arising from noise; • sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas; • limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation by encouraging good design.
Any other 'wider than local' policy/ proposals/ evidence documents?	DEFRA Noise Policy Statement for England (2010)
Local evidence/ policy, etc	<p>Air Quality Action Plan, Adur District Council, July 2007 Shoreham Airport Draft Noise Action Plan (2010-2015) Contaminated Land Study of each site 2009 Noise Action Plan Air Quality and Emissions Mitigation Guidance for Sussex Authorities (2013) Planning Noise Advice Document: Sussex (2013)</p>
Council Priorities	Supporting and improving the local economy – Priority 3: support high quality development.
Does this policy replace a saved policy/ policies of the Adur Local Plan? If so, which?	New policy

Please note that light pollution is addressed in Draft Policy 14: Quality of the Built Environment and Public Realm

Revised Draft Policy 35: Water Quality and Protection	
National Planning Context/ legal context	The Water Framework Directive provides an opportunity to deliver a better water environment focussing on surface freshwater, groundwater, groundwater dependent ecosystems and estuaries.
Any other 'wider than local' policy/ proposals/ evidence documents?	South East England River Basin Management Plan produced by the Environment Agency for the South East River Basin District.
Local evidence/ policy, etc	Outline Water Cycle Strategy – Halcrow June 2009
Council Priorities	Not directly related
Does this policy replace a saved policy/ policies of the Adur Local Plan? If so, which?	New policy

Revised Draft Policy 36: Flood Risk and Sustainable Drainage	
<p>National Planning Context/ legal context</p>	<p>National Planning Policy Framework The NPPF states that new development should be planned to avoid increased vulnerability to impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure.</p> <p>Local Plans must be supported by a Strategic Flood Risk Assessment (SFRA) and develop policies to manage flood risk, taking account of advice from the Environment Agency.</p> <p>Local Plans should apply a sequential risk-based approach to the location of development to avoid flood risk to people and property where possible, and manage any residual risk, taking account of the impacts of climate change. Where it is not possible to locate development in zones with a lower probability of flooding, the exceptions test should be applied.</p>
<p>Any other 'wider than local' policy/ proposals/ evidence documents?</p>	<p>Beachy Head to Selsey Bill Shoreline Management Plan First Review (2006) This document was produced by a number of bodies in partnership including Adur District Council, West Sussex County Council, East Sussex County Council and the Environment Agency. The Plan is a large scale assessment of the risks to people and the historic and natural environment resulting from the evolution of the coast.</p> <p>Rivers Arun to Adur Flood and Erosion Management Strategy 2010-2020. This document was produced by the Environment Agency, Arun District Council, Adur District Council and Worthing Borough Council. It sets out the plan to manage flood risk and erosion risks along the coastline. This document also sets out proposes to improve the defences along the East and West banks of the River Adur.</p>

<p>Local evidence/ policy, etc</p>	<p>Adur Strategic Flood Risk Assessment Update 2012 This report contains information on flood zones and an assessment of risks from all sources of flooding and contains more detailed information on the nature of flood hazards that exist in areas that flood.</p> <p>Design and Flood Risk Study (2011) One of the key requirements of the study was to investigate and model in greater detail the risk of flooding at Shoreham Harbour. The study investigated:</p> <ul style="list-style-type: none"> • Coastal frontage flood and coastal risk management design options • Broad level flood defence options for potential development areas (western arm and eastern canal areas of Shoreham Harbour) • Whether these defence options would provide a sufficient level of protection to ensure that properties would be safe, and • Whether these options would increase flood risk elsewhere <p>The report found that a proposed defence option at the harbour (western arm and eastern canal) would not increase flood risk elsewhere providing the desired level of protection for the development areas. In addition, the report provides the maximum sea-levels under flood conditions (which varies spatially throughout the Harbour) thus providing a starting point for further investigation into more detailed flood defence options at the harbour.</p> <p>Sequential and Exceptions Test 2013 The Sequential Test is a risk based approach to assessing flood risk which gives priority to sites in ascending order of flood risk i.e. lowest risk first. The following sites pass the Sequential Test: New Monks Farm West Sompting Shoreham Harbour Pond Road Adur Civic Centre</p>
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	<p>Shoreham Police Station site Eastbrook Allotments</p> <p>Both Shoreham Airport and Ropetackle North will pass the sequential test once the Shoreham Tidal Walls are constructed.</p> <p>The Exceptions Test provides a method of managing flood risk while still allowing necessary development to occur. It is applied following application of the Sequential Test where it is not possible for development to be located in zones of a lower probability of flooding.</p> <p>The exceptions test was required for the following sites, all of which passed: New Monks Farm Shoreham Harbour Civic Centre Ropetackle North (subject to construction of Shoreham Tidal Walls)</p>
Council Priorities	Not directly related
Will this policy replace a saved policy/ policies of the Adur Local Plan 1996? If so, which?	Policy AP3: Areas at Risk from Flooding Policy AP4: Development and Land Drainage

Revised Draft Policy 37: Telecommunications.	
National Planning Context/ legal context	The NPPF states that advanced high quality communications infrastructure is essential for sustainable economic growth. Local Plans should support the expansion of electronic communications network, including telecommunications and high speed broadband. They should aim to keep the numbers of radio and telecommunications masts and sites to a minimum consistent with the efficient operation of the network. Detailed guidance is given regarding evidence required to justify proposed telecommunications development. Applications should be determined on planning grounds, and should not seek to prevent competition between operators, question the need for the telecommunications system, or determine health safeguards if the proposal meets International Commission guidelines for public exposure.
Any other 'wider than local' policy/ proposals/ evidence documents?	-
Local evidence/ policy, etc	-
Council Priorities	Not directly related.
Does this policy replace a saved policy/ policies of the Adur Local Plan? If so, which?	AB29: Other Communications Development. (AB28: Satellite Television Dishes – Most satellite dishes are now dealt with by permitted development, so it is not considered necessary to replace this policy).