

# PROPOSED SUBMISSION ADUR LOCAL PLAN 2014

## QUESTIONS AND ANSWERS

### *Progress of the Local Plan*

#### **Q: What stage is the Local Plan at and when can I have my say?**

A: We are now approaching the last stages of the Local Plan when following previous consultation stages, we now need to ensure that the Plan is sound prior to formally submitting the Plan to the Secretary of State for a public hearing. The Plan will be published for a 6 week period from the 20<sup>th</sup> October to the 1<sup>st</sup> December 2014 so that you can tell us whether you consider the Plan to be sound or not using the Government's tests of soundness (see below). Please ensure you use one of our representation forms, - you can either post it to us, email it to us, or hand it in to Adur Civic Centre helpdesk or Portland House, Worthing. Whichever you choose, please ensure it reaches us before the deadline.

#### **Q What are the Tests of Soundness?**

A: These are the tests set out in the National Planning Policy Framework. The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is "sound" – namely that it is:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. We have to demonstrate that we have done everything we can to address the future need for new homes and jobs.
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. Policies in the Plan should be supported by appropriate evidence.
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities. Policies in the Plan must be viable and capable of being delivered.
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Framework.

**Q: What consultation has taken place previously on the Plan?**

A: We have undertaken a lot of consultation on the Plan over the last four years as shown in the table below. Comments made at each stage have been taken into account in the emerging Local Plan.

<b>Stakeholder Issues and Options</b> A slim line Draft Core Strategy document was produced, containing a vision for the District; key objectives; four spatial options and a range of policy options.	June – July 2010
<b>Adur Housing and Employment Options</b> This stage of consultation sought views, on what level of housing and employment development should be included in the draft Adur Core Strategy.	27 June – 7 August 2011
<b>Draft Adur Local Plan</b> This was the first opportunity to consult on a draft of the whole Local Plan, setting out the Vision and Objectives; a Strategy for Change and Prosperity; area based policies for the main settlements and countryside, and development management policies.	19 September – 31 October 2012
<b>Revised Draft Adur Local Plan</b> This version of the Local Plan set out the Council's chosen housing target and detailed policies regarding the greenfield sites allocated to help meet that target. It also contained a revised employment target and changes to other policies reflecting the outcome of consultation and further work.	26 September – 7 November 2013 *

(\* The deadline for the receipt of representations was extended by a further two weeks.)

**Q: What are the next steps?**

A: Following the above publication stage for 6 weeks, it is proposed to submit the Local Plan to the Secretary of State in March 2015 and to hold a public hearing in June 2015. If the Inspector (of the public hearing) considers the Plan to be sound with no further changes to be made, then it is hoped the Plan can be adopted in November 2015.

## ***Housing***

### **Q: If the population is increasing slowly – why do we need to provide as much housing as being proposed?**

A: It is the projected increase in households that generates a need for new housing. Households are getting smaller with more single person households being created.

### **Q: Why do we need to provide homes for in-migrants – can't we just accommodate natural population change?**

A: Death rates in Adur have consistently exceeded birth rates (although this has been improving over recent years). The growth in population has been achieved through in-migration which is needed to maintain and support existing shops and services; to balance an ageing population; to maintain a labour force and to support economic growth (also bringing new skills into the area). Net in-migration is approximately 400 people per year.

### **Q: Where are the in-migrants coming from?**

A: Mainly from Brighton and Hove (87%) with most of the remaining from London.

### **Q: Why do we need to provide *new* housing – can't we use existing stock?**

A: New housing is required to meet the projected increase in the number of households. Whilst conversion of larger homes and some vacant homes will meet some needs, this is not enough.

### **Q Why do we need any *more* housing?**

A: The NPPF requires that Local Planning Authorities meet their full objectively assessed needs (OAN) for both market and affordable housing. For Adur - the OAN is between 3,600 and 4,800 new homes up to 2031 based on detailed work undertaken by consultants on behalf of the coastal local planning authorities. New housing is therefore required to meet the projected increase in the number of households. The existing dwelling stock is not sufficient to meet these needs and whilst conversion of larger homes and some vacant homes will meet some needs, this is not enough.

### **Q Why can't you use brownfield land for housing, instead of greenfield?**

A: A thorough assessment of brownfield land has indicated that there is only capacity for approximately 2558 new homes on brownfield sites taking account of what is likely to come forward over the plan period. This includes 1,100 proposed homes at Shoreham Harbour. Given the shortfall in meeting overall needs, we have had to look at greenfield land on the edge of the urban areas. Whilst Shoreham Harbour and some sites near to town centres provide an opportunity for higher density housing, to increase densities generally across the district within the urban areas is not appropriate on account of impacts on the living environment and character.

If we just provide for a lower amount of housing on brownfield sites, this will mean that many future households will have to leave the district to find housing and if these are mainly young people then this will intensify the ageing population. It will also mean fewer people to work in and use shops and services. It will also impact on the local economy as the labour force shrinks (whilst firms could look elsewhere for labour this will create more car trips and impact on the already congested road system).

**Q: What about Shoreham Harbour?**

A: Shoreham Harbour Regeneration area is our largest brownfield site and has been identified as a broad location for development. It could deliver up to 1100 new homes as part of the overall brownfield delivery figure.

**Q. How have the greenfield sites been chosen?**

A: An assessment of greenfield sites in Adur has been undertaken through a number of evidence studies which took into account constraints such as biodiversity, flood risk and landscape issues. Land is limited in Adur and, given this evidence, two sites have been allocated, at New Monks Farm, Lancing and West Sompting, which together will deliver between 930 and 1080 dwellings with supporting infrastructure.

**Q: Why can't some housing be allocated to the South Downs National Park area of Adur?**

A: Whilst the National Park will accommodate some housing to meet needs generated in its area, the main aim is to conserve and enhance the natural beauty, wildlife and cultural heritage of the area. It also has a duty to promote opportunities for the understanding and enjoyment of the special qualities of the Park by the public. Large-scale housing development would not be appropriate in this sensitive environment. The Adur Local Plan does not cover the South Downs National Park since this is the subject of a separate local plan being produced by the SDNPA.

**Q: Will all these new homes meet the Objectively Assessed Need?**

A: No. The various sources of housing supply indicates that the level of new homes being provided may be sufficient to meet the lowest end of the OAN but it will not meet our needs in full. To meet needs in full would entail using every bit of open space and open gap land/countryside which is not acceptable. We have tried to ensure a balance between meeting needs and protecting the character of Adur and its living environment.

**Q What are you doing about traffic impacts arising from the proposed strategic developments?**

A: The proposed developments will not go ahead (planning permissions will not be granted) without the necessary transport improvements or mitigation measures required as detailed in the transport study undertaken for the Local Plan as well as the transport strategy for Shoreham Harbour. The study indicates that if such measures are put in place then the development will not have a significant/severe impact on the road network. Improvements to a number of key junctions will be required to increase their capacity as well as a range of sustainable transport measures.

**Q Why are you building in floodplains?**

A: In the Government's National Planning Policy Framework Planning Practice Guidance, the Government identify the following flood zones:

- Flood Zone 1 – Low probability
- Flood Zone 2 – Medium Probability
- Flood Zone 3a – High Probability
- Flood Zone 3b – Functional Floodplain

Functional floodplain (Flood Zone 3b) is defined as land where water has to flow or be stored in times of flood with regard to river and sea flooding. The majority of development (other than essential infrastructure and water compatible development) is not permitted in such a location.

As identified within the Council's Strategic Flood Risk Assessment, the only allocation that currently falls within the definition of Functional Floodplain is Shoreham Airport, but the Local Plan states that new development within this allocation can only take place once the proposed Shoreham Adur Tidal Walls are in place. Once the tidal walls are constructed, Shoreham Airport will no longer be classified as Functional Floodplain and will instead fall within Flood Zone 3a.

Some of the land at Shoreham Harbour and New Monks Farm has a high probability of flooding (Flood Zone 3a). However, Government guidance doesn't prevent development in Flood Zone 3a providing that there are no alternative sites that have a lower risk and that flood risk can be mitigated on site without increasing flood risk elsewhere. The Council are working with developers, the Environment Agency and West Sussex County Council to ensure that flood risk can be mitigated without worsening the situation off-site. The evidence at this current time shows that this is likely to be possible but there is more work to be done, both now and at the detailed design stage.

Any site allocated in a Local Plan that is at risk of flooding is required to pass the Sequential and Exceptions test as set out in the National Planning Policy Framework. All the relevant sites allocated in the Plan have passed the Sequential and Exceptions Test and the Council's Sequential and Exceptions Test document can be viewed on its website.

### **Q What are you doing about infrastructure?**

A: The term 'infrastructure' includes a wide range of items, such as utilities, green infrastructure (including open space); sports facilities; play areas; roads; public transport; education; libraries; health facilities; flood defence; drainage; waste and recycling; and public art.

The proposed strategic development sites will be required to deliver infrastructure on-site to serve their communities, and if appropriate, financial contributions for off-site facilities. Delivery of major infrastructure will often require a multi-agency approach and partnership working. Smaller sites should also contribute towards the delivery of facilities and services to ensure that the cumulative impacts of development can be managed and provided for in a timely and effective way.

An Infrastructure Delivery Plan (IDP) has been published alongside this Local Plan. Following the adoption of the Local Plan the IDP will be regularly updated. It sets out the infrastructure needs associated with the implementation of this Local Plan, how they will be delivered, by which agencies, and how they could be funded.