



## MAJOR MODIFICATIONS PROPOSED TO THE SUBMISSION ADUR LOCAL PLAN 2016

### ADUR DISTRICT COUNCIL OCTOBER 2016

The schedule below sets out changes proposed to the Submission Adur Local Plan 2016, which has been submitted under Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012. These are intended to assist the Inspector in understanding the Council's position.

Major modifications are proposed changes which alter the meaning of a policy or strategy. These changes are recommended to the Inspector, and if agreed by the Inspector will be subject to consultation after the examination hearings and before the adoption of the Local Plan.

In all cases the reason for the change is stated.

<b>Mod No.</b>	<b>Reference (Paragraph, policy or map number)</b>	<b>Amendment</b> (Deleted text shown as struck through and additional text <b><u>shown in bold and underlined</u></b> )	<b>Reasons For Change</b>  (Please note that references to representations refer to those received in response to the Amendments to the Proposed Submission Adur Local Plan 2016 unless otherwise stated).
MM1	Paragraph 1.34 Vision 7	Adur's character and local distinctiveness (urban and rural, coastal and countryside) will have been maintained and enhanced through protection and enhancement of its landscape, townscape, cultural heritage and biodiversity. Important views will have been protected. <b><u>Net gains in natural capital will have been delivered.</u></b>	To address issues raised by Sussex Wildlife Trust (Rep 70/25) and to clarify the need for the Plan to deliver net gains in natural capital.

MM2	Policy 2	Up to 2034 <del>2</del> ...	To ensure Plan has 15 year time-span post anticipated adoption in 2017.
MM3	Heading	<b>HOUSING PROVISION 2011- 2034<del>2</del></b>	To ensure Plan has 15 year time-span post anticipated adoption in 2017.
MM4	2.13	The most up-to-date work on OAN, and that which is used in this Local Plan, is the <del>Objectively Assessed Need for Housing: Adur District 2015 study</del> <b><u>Objectively Assessed Housing Need Update 2016</u></b>	Update
MM5	Footnote (linked to para 2.13)	<del>3 Objectively Assessed Need for Housing: Adur District 2015.</del> <b><u>Objectively Assessed Housing Need Update 2016</u></b> <sup>3</sup> (GL Hearn).	Update
MM6	2.14	This <del>2015</del> <b><u>2016</u></b> study uses an updated set of demographic projections, taking account of information including <del>2012</del> <b><u>2014</u></b> -based Sub-National Population Projections ( <del>March 2014</del> <b><u>May 2016</u></b> ) and the <del>2012</del> based Household Projections ( <del>February 2015</del> <b><u>July 2016</u></b> ). It also takes account of the Government's Planning Practice Guidance published in 2014. This study supersedes all previous Objectively Assessed Need Assessments.	To reflect updated evidence
MM7	2.16	In terms of Adur's Objectively Assessed Needs the study recommends the delivery of <del>294</del> <b><u>325</u></b> dwellings per annum ( <del>6,825</del> <b><u>5820</u></b> dwellings over the Plan period). This represents 'demand' for new housing.	To reflect updated evidence
MM8	2.16A	The OAN <b><u>2016</u></b> assessment of housing need suggests that for C2 uses such as residential care and nursing homes there is a potential need for <del>29</del> <b><u>38</u></b> bedspaces over the plan period 2011-2034 <del>2</del> which equates to 1-2 per annum.	To reflect updated evidence
MM9	2.20	This clearly indicates that, when measured against Adur's Objectively Assessed Needs figure of <del>5820</del> <b><u>6,825</u></b> dwellings over the Plan period, the amount of residential development that can be delivered on brownfield sites results in a considerable shortfall of <del>4,296</del> <b><u>3294</u></b> dwellings. It has therefore been necessary to allocate greenfield sites.	To reflect updated evidence

MM10	2.22	... Taking these greenfield sites into account the Plan can deliver 3609 dwellings ( <del>172 480</del> dpa), leaving a shortfall of <del>2214</del> <b>3,216</b> dwellings.	To reflect updated evidence																
MM11	Table 1	<p><b>Table 1 – Housing supply over the Local Plan Period 2011-2034-2</b></p> <p><b>Sources of Housing Supply</b></p> <table> <tr> <td>Dwellings completed (net) 2011-- 2015</td> <td>528</td> </tr> <tr> <td>Existing commitments (large and small sites where planning permission has been granted)</td> <td>326</td> </tr> <tr> <td>Sites identified in the SHLAA (net) 2015</td> <td>291</td> </tr> <tr> <td>Windfall allowance</td> <td>416</td> </tr> </table> <p><b>Sites to be identified in Local Plan:</b></p> <table> <tr> <td>Shoreham Harbour Broad Location</td> <td>968</td> </tr> <tr> <td>New Monks Farm Strategic Allocation</td> <td>600</td> </tr> <tr> <td>West Sompting Strategic Allocation</td> <td>480</td> </tr> <tr> <td><b>Total Housing Supply (Delivery Target) 2011-2034<del>2</del></b></td> <td>3609 (annual target <b><del>180-172</del>)</b></td> </tr> </table>	Dwellings completed (net) 2011-- 2015	528	Existing commitments (large and small sites where planning permission has been granted)	326	Sites identified in the SHLAA (net) 2015	291	Windfall allowance	416	Shoreham Harbour Broad Location	968	New Monks Farm Strategic Allocation	600	West Sompting Strategic Allocation	480	<b>Total Housing Supply (Delivery Target) 2011-2034<del>2</del></b>	3609 (annual target <b><del>180-172</del>)</b>	To ensure Plan has 15 year time-span post anticipated adoption in 2017.
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MM12	2.23	Consequently the Local Plan is not able to meet the full objectively assessed housing needs figure of <del>5820</del> <b>6825</b> dwellings	To reflect updated evidence.																
MM13	Policy 3	<p><b>Policy 3: Housing Provision</b></p> <p>Over the period 2011 – 2034<del>2</del> a minimum of 3609 dwellings will be developed in Adur, as follows:</p> <ul style="list-style-type: none"> <li>• 1429 within the built up area of Adur</li> <li>• 1100 as part of the Shoreham Harbour Regeneration Area Western Arm</li> <li>• 600 at New Monks Farm</li> <li>• 480 at West Sompting</li> </ul>	To ensure Plan has 15 year time-span post anticipated adoption in 2017.																
MM14	2.24	The figures in Policy 3 above equate to an annual target of	To ensure Plan has 15 year time-																

		480- <del>172</del> dwellings per year over the 20 <del>1</del> year plan period.	span post anticipated adoption in 2017.
MM15	Policy 4	To facilitate regeneration and ensure a sustainable economy, <del>land will be allocated to provide</del> a total of approximately 41,000 square metres of <del>land will be allocated</del> <b>of floorspace</b> for appropriate employment generating uses in Adur...	To correct a drafting error.
MM16	Policy 4	up to 2034 <del>2</del> at the following locations:	To ensure Plan has 15 year time-span post anticipated adoption in 2017.
MM17	Policy 5	The Withy Patch Gypsy and Travellers site should be relocated, <b><u>to allow for the delivery of the new roundabout access onto the A27,</u></b> and increased in size. The new site should be built at a higher level to reduce flood risk and to take the site out of Flood Zone 3. This will enable the provision of additional pitches in the future to meet identified needs.	To address a point made by Albermarle (Rep 65/48) in their response to the 2016 Local Plan consultation, to make clear that the travellers site would be relocated specifically to allow delivery of the proposed new roundabout access.
MM18	Policy 6 Second bullet point	<ul style="list-style-type: none"> <li>...A27 Sompting Bypass/ Upper Brighton Road (Lyons Farm junction), <b><u>A27/ Dankton Lane junction,</u></b> and enhancement of the traffic calming scheme in West Street.</li> </ul>	Amendment made in response to comments made by Turleys (Rep 62/26) and Highways England (Rep 69/42)
MM19	Policy 6	<p>.....Appropriate mitigation of any issues raised through these assessments is to be secured.</p> <p><del>The elements identified above, and any other infrastructure requirements are to be secured through CIL/ s106/planning conditions as appropriate ....</del></p> <p>....and upsizing purposes.</p> <p><del>All elements are to be secured through s106/planning conditions. <b><u>The elements identified above, and any other infrastructure requirements are to be secured through CIL/ s106/planning conditions as appropriate.</u></b></del></p>	Correction of drafting error. There were two references to the collection of contributions in the policy. This has been simplified to one reference at the very end of the policy.

MM20	Policy 7	Mitigation measures will be required to ensure that new development at the Airport does not impact on the ecological value of the airport itself or the adjacent Adur Estuary SSSI. <b><u>Where possible,</u></b> ecological enhancements should be incorporated as an integral part of the development.	To address comments made by Albemarle (Rep 65/48) in their response to the 2016 Local Plan consultation, bringing the policy in line with the National Planning Policy Framework.
MM21	Policy 7	Infrastructure requirements are to be addressed through s106/ <b><u>CIL</u></b> planning conditions as appropriate.	To retain flexibility, until the Council considers CIL in more detail.
MM22	Policy 8	.....1100 new dwellings within the Shoreham Harbour Regeneration Area <b><u>Western Harbour Arm</u></b>	For clarification
MM23	Policy 8	...within Adur District during the plan period to 2034 <b><u>2.</u></b>	To extend the plan period of the Shoreham Harbour JAAP, in line with proposed modification to Policy 3.
MM24	Policy 8	.....A total of a <b><u>Approximately</u></b> 16,000 sqm of employment generating uses.....	For clarification
MM25	Policy 8	...provided up to 2034 <b><u>2.</u></b>	To extend the plan period of the Shoreham Harbour JAAP, in line with proposed modification to Policy 3.
MM26	Policy 8 Character Area 5	To designate Southwick Waterfront as a strategic employment area ( <del>Strategic Site 3</del> ).	Deleted as Shoreham Harbour JAAP strategic sites are not referred to elsewhere in this Local Plan.
MM27	Policy 8 Character Area 7	To designate the Western Harbour Arm (Waterfront) as a strategic mixed-use area ( <del>Strategic Site 4</del> ).	Deleted as Shoreham Harbour JAAP strategic sites are not referred to elsewhere in this Local Plan.
MM28	Para 3.1	...More detail regarding appropriate uses in Lancing town centre is set out in the policy below. These are viewed as positive planning actions to maintain and enhance a healthy and vibrant village centre. <b><u>The policy also allows for appropriate D1 uses in certain circumstances in the primary and secondary frontages of Lancing town</u></b>	To provide more flexibility and recognise the role that some D1 uses can make to the town centre.

		<b><u>centre in addition to A class uses. Please see paragraph 4.66a in Part 4 of the Plan for more information on appropriate D1 uses.</u></b>	
MM29	Policy 9	<p>Within the primary frontages of blocks 1, 2 (excluding Queensway Shopping Precinct) and 3, the following uses will be acceptable at ground floor level, subject to compliance with other relevant policies:</p> <ul style="list-style-type: none"> <li>• A1 (shops)</li> <li>• A3 (food and drink), A4 (drinking establishments) <b><u>and appropriate D1 (non-residential institutions) uses</u></b> where there is a long term vacancy (normally a minimum of 1 year) and reasonable attempts have been made to sell or let the premises for A1 use.</li> </ul> <p>Any other uses will be resisted.</p> <p>Within the primary frontage of Queensway Shopping Precinct, the following uses will be acceptable at ground floor level, subject to compliance with other relevant policies:</p> <ul style="list-style-type: none"> <li>• A1 (shops)</li> <li>• A2 (financial and professional services), A3 (food and drink), A4 (drinking establishments), A5 (hot food takeaways) <b><u>and appropriate D1 (non-residential institutions) uses</u></b> where there is a long term vacancy (normally a minimum of 1 year) and reasonable attempts have been made to sell or let the premises for A1 use.</li> </ul>	To provide more flexibility and recognise the role that some D1 uses can make to the town centre.
MM30	Para 3.13 and new para 3.13a	Shoreham town centre is relatively healthy and provides a different and complementary retail offer distinct from the larger shopping centres in the area (Brighton and	To provide more flexibility and recognise the role that some D1 uses can make to the town centre.

		<p>Worthing). Its day-to-day shopping function should be protected, and its niche shopping role maintained and developed to serve the needs of residents and visitors, including the needs arising from new homes and businesses proposed in the area. <b><u>The policy below allows for A class uses as well appropriate D1 uses in certain circumstances in the primary and secondary frontages in Shoreham town centre. Please see paragraph 4.66a in Part 4 of the Plan for more information on appropriate D1 uses.</u></b></p> <p><b>3.13a</b> <del>However</del> Opportunities are limited in the core of the existing town centre to accommodate significant additional retail floorspace because of physical constraints. As a result, any larger-scale convenience retail development should be located on the eastern side of the town centre to help reinforce the existing shopping centre and to meet the demand from growth at Shoreham Harbour.<sup>1</sup> The Adur Retail Study Update produced in 2013 identified capacity for an additional 3,250 sqm of convenience goods floorspace and 6,550 sqm of comparison goods floorspace in Shoreham town centre up to 2031. These capacity figures assume an altering of the balance of market shares with other shopping areas as a result of new retail development in Shoreham Town Centre.</p>	
MM31	Policy 11	<p>Within the primary frontages of blocks 2, 3, 5 and 6 the following uses will be acceptable at ground floor level, subject to compliance with other relevant policies:</p> <ul style="list-style-type: none"> <li>• A1 (shops)</li> <li>• A3 (food and drink) <b><u>and appropriate D1 (non-residential institutions) uses</u></b> where there is a long term vacancy (normally a minimum of 1 year) and</li> </ul>	To provide more flexibility and recognise the role that some D1 uses can make to the town centre.

		<p>reasonable attempts have been made to sell or let the premises for A1 use.</p> <p>Any other uses will be resisted.</p> <p>Within the primary frontage of block 4, the following uses will be acceptable at ground floor level, subject to compliance with other relevant policies:</p> <ul style="list-style-type: none"> <li>• A1 (shops) and A3 (food and drink).</li> <li>• <b><u>Appropriate D1 (non-residential institutions) uses where there is a long term vacancy (normally a minimum of 1 year) and reasonable attempts have been made to sell or let the premises for A1 or A3 use.</u></b></li> </ul> <p>Any other uses will be resisted.</p> <p>Within the secondary frontages of blocks 1, 7 and 8, the following uses will be acceptable at ground floor level, subject to other relevant policies:</p> <ul style="list-style-type: none"> <li>• A1 (shops), A2 (financial and professional services), A3 (food and drink), A4 (drinking establishments), and A5 (hot food takeaways) <b><u>and appropriate D1 (non-residential institutions) uses.</u></b></li> </ul>	
MM32	Para 3.34	<p>Southwick Square is owned by Adur District Council and performs well as a shopping centre meeting local day-to-day needs. The Adur Retail Study Update (2013) recommends that every opportunity should be taken to sustain and enhance its important shopping function and to improve its existing environment and townscape quality. The centre also provides other services for the community including a library, health centre and a community centre.</p>	<p>To provide more flexibility and recognise the role that some D1 uses can make to the town centre.</p>



		<b><u>The policy below allows for A class uses as well appropriate D1 uses within Southwick Square. Please see paragraph 4.66a in Part 4 of the Plan for more information on appropriate D1 uses.</u></b>	
MM33	Policy 12	Within the primary frontage of Southwick town centre, A1 (shop) uses will be supported. A2 (financial and professional services), A3 (food and drink), A4 (drinking establishments), and A5 (hot food takeaways) <b><u>and appropriate D1 (non-residential institutions)</u></b> uses will also be permitted where they would not have an adverse impact on the vitality and viability of the town centre.	To provide more flexibility and recognise the role that some D1 uses can make to the town centre.
MM34	4.27	... The Objectively Assessed Need (OAN) for Housing: Adur District (2015) report <b><u>together with the Objectively Assessed Housing Need Update 2016 (which uses the rebased 2014 Sub-National Population and Household Projections)</u></b> builds on this work...	Update
MM35	4.29	The findings from the OAN reports <b><u>s</u></b> suggest that <b><u>for market housing...</u></b>	Consistency with other major modifications.
MM36	4.29	... However, at a district wide level, <b><u>within the Local Plan area</u></b> future delivery of market housing should reflect the following mix:	Correction.
MM37	4.29	<ul style="list-style-type: none"> <li>• 1-bed properties: <b><u>5</u></b>-10%</li> <li>• 2-bed properties: <b><u>40</u></b>-45%</li> <li>• 3-bed properties: <b><u>40-45%</u></b> 35%</li> <li>• 4-bed properties: <b><u>5</u></b>-10%</li> </ul>	Updated to reflect the Objectively Assessed Housing Need Update (2016).
MM38	4.30	The OAN <b><u>2016</u></b> report indicates that the population of Adur is ageing with <b><u>a greater proportion of the population in age groups 65+</u></b> the 75+ age group showing the greatest <del>proportional increase over the Plan period.</del>	Updated to reflect most recent evidence.
MM39	4.40	It indicated that there continues to be a high level of need for affordable housing in Adur and identified a	Updated to reflect most recent evidence.

		<p>requirement for 233 (net) homes per annum between 2011-2031 if all households in housing need were to be housed. <b><u>The Objectively Assessed Housing Need Update report (2016) has updated the need for different tenures and sizes of affordable homes, based on demographic change.</u></b></p>	
MM40	4.40A	<p>Average wages in Adur are low and an estimated 83% of households with a current need are unlikely to have sufficient income to afford market housing. <b><u>The scale of affordable housing need is substantial and whilst it is unrealistic that this need will be met in full, an upward adjustment of 10% to demographic projections has been taken account of within the objectively assessed need figure, in order to boost the delivery of both market and affordable housing and improve affordability.</u></b> <del>The evidence indicates that, whilst there is a shortfall in the need for and supply of affordable housing, it does not necessitate an increase in the overall housing supply. However, a higher level of overall housing delivery would help improve affordability for younger households and so over the Plan period an increase of 10 homes per annum is considered appropriate</del></p>	Updated to reflect most recent evidence.
MM41	4.40C	<p><del>Smaller properties are in greatest demand, although letting requirements on 4+ bed properties are more critical, as there is minimal turnover on these larger homes. At a district wide level, the OAN report recommends the following mix of affordable housing:</del></p> <ul style="list-style-type: none"> <li><del>● 1 bed dwellings 20-25%</del></li> <li><del>● 2 bed dwellings 30-35%</del></li> <li><del>● 3 bed dwellings 30-35%</del></li> </ul>	Updated to reflect most recent evidence.

		<p style="text-align: center;">● 4 bed dwellings 10-15%</p> <p><u>In terms of need for different sizes of dwellings, evidence clearly indicates that the need for social/rented dwellings is focused towards smaller dwellings but with an overall profile whereby the greatest need is for two and three bed dwellings:</u></p> <table border="1" data-bbox="772 432 1514 810"> <thead> <tr> <th></th> <th><u>1 bedroom</u></th> <th><u>2 bedrooms</u></th> <th><u>3 bedrooms</u></th> <th><u>4+ bedrooms</u></th> </tr> </thead> <tbody> <tr> <td><u>Intermediate homes</u></td> <td><u>15-20%</u></td> <td><u>50-55%</u></td> <td><u>25-30%</u></td> <td><u>0-5%</u></td> </tr> <tr> <td><u>Social/Affordable Rent</u></td> <td><u>30%</u></td> <td><u>40%</u></td> <td><u>25%</u></td> <td><u>5%</u></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>		<u>1 bedroom</u>	<u>2 bedrooms</u>	<u>3 bedrooms</u>	<u>4+ bedrooms</u>	<u>Intermediate homes</u>	<u>15-20%</u>	<u>50-55%</u>	<u>25-30%</u>	<u>0-5%</u>	<u>Social/Affordable Rent</u>	<u>30%</u>	<u>40%</u>	<u>25%</u>	<u>5%</u>						
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MM42	New paragraph at 4.66a	<p><u>It is considered that due to the changing role of town centres as a result primarily of the growth in online shopping, there is a need for high streets to offer something that the internet cannot. Therefore, in addition to A3 and A4 uses, the place based policies in Part 3 of this Plan also allow for appropriate D1 uses in the primary and secondary frontages. In this case, appropriate D1 uses are those that contribute positively to the vitality and viability of a centre, generating footfall throughout the day and retaining a shopfront. Such uses would normally include those in the health and beauty sector.</u></p>	To provide more flexibility and recognise the role that some D1 uses can make to the town centre.																				