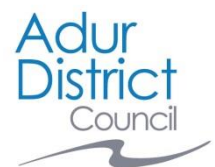


# **Submission Adur Local Plan**

## **Proposed Major Modifications Sustainability Appraisal Addendum**

**October 2016**



## **1. Introduction**

- 1.1 Adur District Council began the preparation of the Adur Local Plan in 2011. As part of this process, a combined Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) has been undertaken (hereinafter referred to as SA).
- 1.2 A SA Report has been produced at various stages throughout the development of the Local Plan, including the SA of the Adur Local Plan in March 2016, documenting the SA process and assessment of results up to that point.
- 1.3 Following consultation on the 'Amendments to Proposed Submission Adur Local Plan' (2016), a small number of major modifications to the Adur Local Plan are proposed for the following reasons:
  - To address some matters raised in representations made during the statutory publication period for the Amendments to the Proposed Submission Adur Local Plan 2016; and
  - To improve the Plan.
- 1.4 Given that these constitute major modifications i.e. changes which alter a policy or part of the strategy, it is considered that they should be considered against relevant Sustainability Objectives to see if they would have any impact on the findings of the Sustainability Appraisal. The purpose of this addendum report therefore is to assess the sustainability implications of these proposed modifications.
- 1.5 The table below sets out the policy changes, the reasons for them and the effect they have on the SA.

Mod No.	Reference (Paragraph, policy or map number)	Amendment (deleted text shown as struck through and additional text <b><u>shown in bold and underlined</u></b> )	Reasons For Change  (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).	SA comments
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.	While this addition emphasises the need for net gains in natural capital, it does not require a change to the objectives or policies within the Plan and therefore has no effect in terms of the SA findings.
MM2	Policy 2	Up to <del>2031</del> <b><u>2032</u></b>	To ensure Plan	While this

			has 15 year time-span post anticipated adoption in 2017.	amendment affects the time-span of the Plan by one year, it doesn't affect the total amount of development to be provided over the plan period and would therefore have negligible effects on the SA findings.
MM3	Heading	<b>HOUSING PROVISION 2011- 20342</b>	To ensure Plan has 15 year time-span post anticipated adoption in 2017.	This is an amendment to a sub-heading and will not, in itself, have any effect on the outcome of the SA.
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> <sup>3</sup>	Update	This is an update to supporting text and does not alter policies or the strategy of the Plan. Therefore the update will have no effect on the outcome of the Sustainability Appraisal.
MM5	Footnote	<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	This is an update to a footnote

				referred to in the supporting text and not a policy. Therefore the update will have no effect on the outcome of the Sustainability Appraisal.
MM6	2.14	This <del>2015-</del> <b>2016</b> study uses an updated set of demographic projections, taking account of information including <del>2012</del> <b>2014</b> -based Sub-National Population Projections ( <del>March 2014</del> <b>May 2016</b> ) and the <del>2012-4</del> based Household Projections ( <del>February 2015</del> <b>July 2016</b> ). It also takes account of the Government's Planning Practice Guidance published in 2014. This study supersedes all previous Objectively Assessed Need Assessments. <b>3a</b>	To reflect updated evidence	This is an update to supporting text and does not alter policies or the strategy of the Plan. Therefore the update will have no effect on the outcome of the Sustainability Appraisal.
MM7	2.16	In terms of Adur's Objectively Assessed Needs the study recommends the delivery of <del>294</del> <b>325</b> dwellings per annum <del>6,825</del> <b>5820</b> dwellings over the Plan period). This represents 'demand' for new housing.	To reflect updated evidence	This is an update to supporting text and does not alter policies or the strategy of the Plan. Therefore the update will have no effect on the outcome of the Sustainability Appraisal.
MM8	2.16A	The OAN <b>2016</b> assessment of housing need suggests that for C2 uses such as residential care and nursing homes there is a potential need for	To reflect updated	This is an update to supporting text

		<del>29</del> <b>38</b> bedspaces over the plan period 2011-2034 <del>2</del> which equates to 1-2 per annum.	evidence	and does not alter policies or the strategy of the Plan. Therefore the update will have no effect on the outcome of the Sustainability Appraisal.
MM9	2.20	This clearly indicates that, when measured against Adur's Objectively Assessed Needs figure of <del>5820</del> <b>6,825</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>3291</b> dwellings. It has therefore been necessary to allocate greenfield sites.	To reflect updated evidence	This is an update to supporting text and does not alter policies or the strategy of the Plan. Therefore the update will have no effect on the outcome of the Sustainability Appraisal.
MM10	2.22	... Taking these greenfield sites into account the Plan can deliver 3609 dwellings ( <del>172</del> <b>180</b> dpa), leaving a shortfall of <del>2214</del> <b>3,216</b> dwellings.		This is an update to supporting text and does not alter policies or the strategy of the Plan. Therefore the update will have no effect on the outcome of the Sustainability Appraisal.



		<p><b>developed in Adur, as follows:</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> <b>1429 within the built up area of Adur</b></li> <li><input type="checkbox"/> <b>1100 as part of the Shoreham Harbour Regeneration Area Western Arm</b></li> <li><input type="checkbox"/> <b>600 at New Monks Farm</b></li> <li><input type="checkbox"/> <b>480 at West Sompting</b></li> </ul>	adoption in 2017.	by one year, it doesn't affect the total amount of development to be provided over the plan period and would therefore have negligible effects on the SA findings.
MM14	2.24	The figures in Policy 3 above equate to an annual target of <del>480</del> <b>172</b> dwellings per year over the <del>20</del> <b>1</b> year plan period .	To ensure Plan has 15 year time-span post anticipated adoption in 2017.	This is an update to supporting text and does not alter policies or the strategy of the Plan. Therefore the update will have no effect on the outcome of the Sustainability Appraisal.
MM15	Policy 4	To facilitate regeneration and ensure a sustainable economy, <b>land will be allocated to</b> provide 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 up to 2031 at the following locations:	To correct a drafting error	This amendment will have little impact on the outcome of the Sustainability Appraisal (SA) as the SA of policy 4 was undertaken on the basis that 41,000sqm of employment generating



				<p>floorspace would be delivered through the allocations specified in the policy rather than an allocation of 41,000sqm of land.</p>
MM16	Policy 4	up to 2034 <u>2</u> at the following locations:	To ensure Plan has 15 year time-span post anticipated adoption in 2017.	<p>While this amendment affects the time-span of the Plan by one year, it doesn't affect the total amount of development to be provided over the plan period and would therefore have negligible effects on the SA findings.</p>
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 Albemarle (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	<p>This amendment aims to provide clarity rather than change the intention of the policy in any way. Therefore it would have no impact on the outcome of the SA.</p>

			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 62/66) and Highways England (rep 69/42)	This amendment to include improvements to the A27/Dankton Lane junction would have no significant effect on the outcome of the Sustainability Appraisal.
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.	This amendment is a correction of a drafting error and has no significant effects on the aim of the policy or the Sustainability Appraisal.
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 in their response to the 2016 Local Plan consultation,	While this addition provides slightly more flexibility around the provision of ecological

			bringing the policy in line with the National Planning Policy Framework.	enhancements, it would not have a significant effect on the outcome of the Sustainability Appraisal.
MM21	Policy 7	Infrastructure requirements are to be addressed through s106/ <u>CIL</u> planning conditions as appropriate.	To address comments made by Albemarle in their response to the 2016 Local Plan consultation, bringing the policy in line with the National Planning Policy Framework.	While this is an addition to policy, the amendment doesn't have a significant impact on the aim of the policy and would therefore have no effect on the outcome of the SA.
MM22	Policy 8	.....1100 new dwellings within the Shoreham Harbour Regeneration Area <u>Western Harbour Arm</u> .....	For clarification	This amendment is a clarification and has no effect on the aim of the policy or the outcome of the Sustainability Appraisal.
MM23	Policy 8	...within Adur District during the plan period to 2034 <u>2</u> .	To extend the plan period of the JAAP, in line with proposed modification to Policy 3.	While this amendment affects the time-span of the Plan by one year, it doesn't affect the total amount of development to be provided over

				the plan period and would therefore have negligible effects on the SA findings.
MM24	Policy 8	<del>A total of a</del> Approximately 16,000 sqm of employment generating uses.....	For clarification.	This amendment is a clarification and has no effect on the aim of the policy or the outcome of the Sustainability Appraisal.
MM25	Policy 8	...provided up to 2034 <u>2</u> .	To extend the plan period of the JAAP, in line with proposed modification to Policy 3.	While this amendment affects the time-span of the Plan by one year, it doesn't affect the total amount of development to be provided over the plan period and would therefore have negligible effects on the SA findings.
MM26	Policy 8 Character Area 5	To designate Southwick Waterfront as a strategic employment area <del>(Strategic Site 3)</del> .	Deleted as JAAP strategic sites not referred to elsewhere in this Local Plan.	This amendment would have no impact on the aim of the policy and therefore no effect on the

				outcome of the Sustainability Appraisal.
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 JAAP strategic sites not referred to elsewhere in this Local Plan.	This amendment would have no impact on the aim of the policy and therefore no effect on the outcome of the Sustainability Appraisal.
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 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>	To provide more flexibility and recognise the role that some D1 uses can make to the town centre.	This addition needs to be read in conjunction with new paragraph 4.66a (see below) and the proposed amendments to Policy 9. While the addition supports a number of the Sustainability Objectives, it would have little effect on the outcome of the Sustainability Appraisal.
MM29	Page 68, Policy 9	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: <ul style="list-style-type: none"> <li>• A1 (shops)</li> </ul>	To provide more flexibility and recognise the role that some D1 uses	This addition needs to be read in conjunction with new

		<ul style="list-style-type: none"> <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>	can make to the town centre.	paragraph 4.66a (see below). While the addition supports a number of the Sustainability Objectives, it would have little effect on the outcome of the Sustainability Appraisal.
MM30	Para 3.13 and new para 3.13a	<p>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 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><u>3.13a</u></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</p>		This addition needs to be read in conjunction with new paragraph 4.66a (see below) and the proposed amendments to Policy 11. While the addition supports a number of the Sustainability Objectives, it would have little effect on the

		<p>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>		<p>outcome of the Sustainability Appraisal.</p>
MM31	Page 75, 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 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 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>	<p>To provide more flexibility and recognise the role that some D1 uses can make to the town centre.</p>	<p>This addition needs to be read in conjunction with new paragraph 4.66a (see below). While the addition supports a number of the Sustainability Objectives, it would have little effect on the outcome of the Sustainability Appraisal.</p>

<sup>1</sup> Adur District Council Retail Study Update 2009

		<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. <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></p>	To provide more flexibility and recognise the role that some D1 uses can make to the town centre.	This addition needs to be read in conjunction with new paragraph 4.66a (see below) and the proposed amendments to Policy 12. While the addition supports a number of the Sustainability Objectives, it would have little effect on the outcome of the Sustainability Appraisal.
MM33	Page 80, Policy 12	<p>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) uses</u></b> will also be permitted where they would not have an adverse impact on the vitality and viability of the town centre.</p>	To provide more flexibility and recognise the role that some D1 uses can make to the town centre.	This addition needs to be read in conjunction with new paragraph 4.66a (see below). While the addition supports a number of the Sustainability



				Objectives, it would have little effect on the outcome of the Sustainability Appraisal.
MM34	4.27	... <del>The Objectively Assessed Need (OAN) for Housing: Adur District (2015) report</del> <b><u>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	This is an update to supporting text and not policy. Therefore the update will have no effect on the outcome of the Sustainability Appraisal.
MM35	4.29	The findings from the OAN reports <u>s</u> suggest that <b><u>for market housing...</u></b>	Consistency with other major modifications.	This is an update to supporting text and not policy. Therefore the update will have no effect on the outcome of the Sustainability Appraisal.
MM36 MM37	4.29	... However, <del>at a district wide level,</del> <b><u>within the Local Plan area</u></b> future delivery of market housing should reflect the following mix:  <input type="checkbox"/> 1-bed properties: <b>5</b> -10% <input type="checkbox"/> 2-bed properties: <b>40</b> -45% <input type="checkbox"/> 3-bed properties: <b><u>40-45%</u></b> 35% <input type="checkbox"/> 4-bed properties: <b><u>5</u></b> -10%	Correction.  Updates to reflect the Objectively Assessed Housing Need Update (2016).	This is an update to supporting text and not policy. Additionally, the update reflects current housing need. This would have no effect on the outcome of the Sustainability Appraisal.

MM38	4.30	The OAN <b>2016</b> report indicates that the population of Adur is ageing with <b><u>a greater proportion of the population in age groups 65+ the 75+ age group showing the greatest proportional increase over the Plan period.</u></b>	Updated to reflect most recent evidence.	This is an update to supporting text and not policy and would have no effect on the outcome of the Sustainability Appraisal.
MM39	4.40	It indicated that there continues to be a high level of need for affordable housing in Adur and identified a 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>	Updated to reflect most recent evidence.	This is an update to supporting text and not policy and would therefore have no effect on the outcome of the Sustainability Appraisal.
MM40	4.40A	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 would boost the delivery of both market and affordable housing and improve affordability.</u></b> 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	Updated to reflect most recent evidence.	This is an update to supporting text and not policy and would therefore have no effect on the outcome of the Sustainability Appraisal.
MM41	4.40C	Smaller properties are in greatest demand, although letting	Updated to reflect	This is an update

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:

- ~~1 bed dwellings 20-25%~~
- ~~2 bed dwellings 30-35%~~
- ~~3 bed dwellings 30-35%~~
- ~~4 bed dwellings 10-15%~~

**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>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>

most recent evidence.

to supporting text and not policy and would therefore have no effect on the outcome of the Sustainability Appraisal.

MM42

New paragraph at 4.66a

**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**

To provide more flexibility and recognise the role that some D1 uses can make to the town centre.

This addition needs to be read in conjunction with the proposed additions to policies 9, 11 and 12 (see above). While the

		<u>and beauty sector.</u>		addition supports a number of the Sustainability Objectives, it would have little effect on the outcome of the Sustainability Appraisal.
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## 2. Conclusion

- 2.1 As can be seen from the table above, none of the proposed modification would have any significant effect on the outcome of the Sustainability Appraisal, even where changes have been made to policies. This is because none of the changes affect the aims or intentions of the policies or Plan in any significant way.