

SUBMISSION ADUR LOCAL PLAN 2016

EQUALITIES AND HEALTH IMPACT ASSESSMENT OCTOBER 2016

Addendum to the Equalities and Health Impact Assessment published March 2016



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The Submission Adur Local Plan 2016 is a “clean” version of the Amendments to the Proposed Submission Adur Local Plan (2016) which went out to consultation between 31st March and 11th May 2016. By “clean” we mean that the amendments consulted on are no longer shown with the use of bold, underlined and “strikethrough” text - they are shown as “clean” text. This allows the Inspector examining the Submission Adur Local Plan to start from a “clean” copy in order that any amendments proposed following the examination can be clearly indicated.

The Health and Equalities Impact Assessment March 2016 forms the most recent assessment of the Submission Adur Local Plan. It assessed the Policies proposed in the ‘Amendments’ version of the Plan to ensure that it complies with Adur’s duty under the Equalities Act 2010 and the Councils’ Action On Public Health (2014).

Accompanying the Submission Adur Local Plan 2016 the Council has produced proposed modifications for the Inspector’s consideration. These are changes to the Submission Adur Local Plan 2016 proposed in order to take account of new information and evidence (such as updated statistics) and consultation responses from the March 2016 consultation. The modifications are split into two groups:

- Proposed Minor Modifications
- Proposed Major Modifications

The minor modifications correct drafting errors or updates that do not change the substance of the plan - for example, spelling corrections, clarifications, and changes to ensure consistency. They are not considered in this addendum.

The major modifications concern matters of policy amendment, or facts that may change the interpretation of policy impacts. This addendum lists all the major modifications proposed and determines if they have the potential to change the results of the Health and Equalities Impact Assessment March 2016. **None of the proposed modifications have resulted in a change to the results, as can be seen in the schedule below.**

Major Modification (MM) number, reference and potential policy affected	Proposed Amendment (deleted text shown as struck through and additional text shown in <u>bold and underlined</u>)	Change to Equalities and Health Impact assessment for stage 1?	If yes to stage 1 (see column to left), any changes to stage 2?	Details
MM1 Paragraph 1.34 Vision 7.	Addition: <u>Net gains in natural capital will have been delivered</u>	No	Not applicable; no change to stage 1	The Equalities and Health Impact Assessment only assesses the Policies of the Adur Local Plan. The Vision sets out the aspiration which it is hoped the Policies will bring to effect. Therefore, the change to the Vision need not be assessed here.
MM2 Policy 2: Spatial Strategy	Update: Up to 2034 <u>2032</u>	No	Not applicable; no change to stage 1	This update ensures that the Plan has a 15 year time-span post anticipated adoption in 2017 in line with national policy. It does not change the spatial strategy in any way: the policy still promotes a sustainable pattern of growth.
MM3 Heading to text supporting Policy 3	Update: Housing Provision 2011 - 2034 <u>2032</u>	No	Not applicable; no change to stage 1	This update ensures that the Plan has a 15 year time-span post anticipated adoption in 2017 in line with national policy. It does not change the overall provision of housing within Adur as proposed in Policy 3 because the local planning area is unable to accommodate additional growth.
MM4 Supporting text to policy 3: Para 2.13	Update: The most up-to-date work on OAN, ... is the Objectively Assessed Need for Housing: Adur District 2015³ <u>Objectively Assessed Housing Need Update 2016³</u> .	No	Not applicable; no change to stage 1	This is the updated report which sets the higher OAN figure. The OAN figure does not affect the spatial strategy or the scale of development proposed in Adur because the local plan area is unable to accommodate growth to meet its full OAN.

<p>MM5</p> <p>Supporting text to policy 3: Footnote 3</p>	<p>Objectively Assessed Need for Housing: Adur District 2015³ (GL Hearn). <u>Objectively Assessed Housing Need Update 2016³ (GL Hearn)</u></p>	<p>No</p>	<p>Not applicable; no change to stage 1</p>	<p>This is the updated report which sets the higher OAN figure. The OAN figure does not affect the spatial strategy or the scale of development proposed in Adur because the local plan area is unable to accommodate growth to meet its full OAN.</p>
<p>MM6</p> <p>Supporting text to policy 3: Para 2.14</p>	<p>Update: The 2015 <u>2016</u> study ... taking account of information including the 2012 <u>2014</u> based Subnational Population Projections (March 2014 <u>May 2016</u>) and the 2012-2014 based Household Projections (February 2015 <u>July 2016</u>)....</p>	<p>No</p>	<p>Not applicable; no change to stage 1</p>	<p>This refers to the updated evidence that informs the higher OAN figure. The OAN figure does not affect the spatial strategy or the scale of development proposed in Adur because the local plan area is unable to accommodate growth to meet its full OAN.</p>
<p>MM7</p> <p>Supporting text to policy 3: Para 2.16</p>	<p>Update based on higher OAN figure: ...recommends the delivery of 294 <u>325</u> dwellings per annum 5820 <u>6,825</u> dwellings over the Plan period</p>	<p>No</p>	<p>Not applicable; no change to stage 1</p>	<p>The OAN figure does not affect the spatial strategy or the scale of development proposed in Adur because the local plan area is unable to accommodate growth to meet its full OAN.</p>
<p>MM8</p> <p>Supporting text to policy 3: Para 2.16a</p>	<p>Update to reflect latest evidence: The OAN <u>2016</u> assessment suggests that for C2 uses...there is a potential need for 29 <u>38</u> bedscapes over the plan period 2011-2031-<u>2032</u></p>	<p>No</p>	<p>Not applicable; no change to stage 1</p>	<p>C2 uses do not form part of the housing requirement target and are not included in the housing completions monitoring data. There is no change to the spatial strategy or the scale of development proposed in Adur.</p>
<p>MM9</p> <p>Supporting text to policy 3: Para 2.20</p>	<p>Update: ...when measured against Adur's Objectively Assessed Needs figure of 5820 <u>6,825</u> dwellings over the Plan period, the amount ...results in a considerable shortfall of 3294 <u>4,296</u> dwellings</p>	<p>No</p>	<p>Not applicable; no change to stage 1</p>	<p>The OAN figure does not affect the spatial strategy or the scale of development proposed in Adur because the local plan area is unable to accommodate growth to meet its full OAN.</p>

<p>MM10</p> <p>Supporting text to policy 3: Para 2.22</p>	<p>Update: ...Taking these greenfield sites into account the Plan can deliver 3609 dwellings (480 172 dpa), leaving a shortfall of 2244 3,216 dwellings.</p>	<p>No</p>	<p>Not applicable; no change to stage 1</p>	<p>The changed dpa figure takes account of the updated Plan period to ensure that the Plan has a 15 year time-span post anticipated adoption in 2017 in line with national policy. The amount of shortfall specified takes into account the updated OAN figure. It does not change the overall provision of housing within Adur as proposed in Policy 3 because the local plan area is unable to accommodate additional growth.</p>
<p>MM11</p> <p>Table 1</p>	<p>Update to table heading: Table 1 - Housing supply over the Local Plan Period 2011-2034 2032</p> <p>Update to table content: Total Housing Supply (Delivery Target) 2011-2034 2032 ...(annual target 480 172 dwellings)</p>	<p>No</p>	<p>Not applicable; no change to stage 1</p>	<p>The changed table heading and annual target figure take account of the updated Plan period to ensure that the Plan has a 15 year time-span post anticipated adoption in 2017 in line with national policy. This does not change the overall provision of housing within Adur as proposed in Policy 3 because the local plan area is unable to accommodate additional growth.</p>
<p>MM12</p> <p>Supporting text to policy 3: Para 2.23</p>	<p>Update: Consequently the Local Plan is not able to meet the full objectively assessed housing needs figure of 5820 6825 dwellings</p>	<p>No</p>	<p>Not applicable; no change to stage 1</p>	<p>The higher OAN figure does not affect the spatial strategy or the scale of development proposed in Adur because the local plan area is unable to accommodate growth to meet its full OAN.</p>
<p>MM13</p> <p>Policy 3: Housing Provision</p>	<p>Update: Over the period 2011-2034 2032...</p>	<p>No</p>	<p>Not applicable; no change to stage 1</p>	<p>This update ensures that the Plan has a 15 year time-span post anticipated adoption in 2017 in line with national policy. It does not change the overall provision of housing within Adur as proposed in Policy 3 because the local plan area is unable to accommodate additional growth.</p>

<p>MM14</p> <p>Supporting text to policy 3: Para 2.24</p>	<p>Update: The figures in Policy 3 above equate to an annual target of 480 172 dwellings per year over the 20 21 year plan period.</p>	<p>No</p>	<p>Not applicable; no change to stage 1</p>	<p>The changed annual figure and the 21 year plan period ensures that the Plan has a 15 year time-span post anticipated adoption in 2017 in line with national policy. It does not change the overall provision of housing within Adur as proposed in Policy 3 because the local plan area is unable to accommodate additional growth.</p>
<p>MM15</p> <p>Policy 4: Planning for Economic Growth</p>	<p>Correction of drafting error: To facilitate regeneration and ensure a sustainable economy, land will be allocated to provide a total of approximately 41,000 square metres of land will be allocated of floorpace for appropriate employment generating uses in Adur...</p>	<p>No</p>	<p>Not applicable; no change to stage 1</p>	<p>The intention of the policy remains unchanged. The original wording was a drafting error. There is no change to the allocations for employment generating uses.</p>
<p>MM16</p> <p>Policy 4: Planning for Economic Growth</p>	<p>Update: ... up to 2031 2032 at the following locations:</p>	<p>No</p>	<p>Not applicable; no change to stage 1</p>	<p>This update ensures that the Plan has a 15 year time-span post anticipated adoption in 2017 in line with national policy. It does not change the Policy's overall provision for employment space.</p>
<p>MM17</p> <p>Policy 5: New Monks Farm, Lancing</p>	<p>Clarification: The Withy Patch Gypsy and Travellers site should be relocated, to allow for the delivery of the new roundabout access onto the A27, and increased in size....</p>	<p>No</p>	<p>Not applicable; no change to stage 1</p>	<p>This clarification does not make any material change to Policy 5. The policy still has the potential to be positive for most groups dependent upon the detail of provision and subsequent management of facilities / services. Whilst the existing gypsy and traveller site at Withy Patch will need to be relocated as a result of the provision of a new roundabout, its relocation and expansion is likely to be addressed by a separate DPD.</p>

<p>MM18</p> <p>Policy 6: Land at West Sompting</p>	<p>Addition: A27 Sompting Bypass/Upper Brighton Road (Lyons Farm junction), <u>A27/Dankton Lane junction</u>, and enhancement of the traffic calming scheme in West Street.</p>	<p>No</p>	<p>Not applicable; no change to stage 1</p>	<p>This addition references the provision or funding of mitigation for off-site traffic impacts at the A27/Dankton Lane junction. It contributes to Policy 6 continuing to have a positive outcome for a number of groups as if forms part of a package of measures to manage traffic and provide sustainable transport infrastructure alongside the Policy's provision of affordable housing and green infrastructure.</p>
<p>MM19</p> <p>Policy 6: Land at West Sompting</p>	<p>Correction of drafting error: Appropriate mitigation of any issues raised through these assessments is to be secured.</p> <p>The elements identified above, and any other infrastructure requirements are to be secured through CIL/ s106/planning conditions as appropriateand upsizing purposes.</p> <p>All elements are to be secured through s106/planning conditions. <u>The elements identified above, and any other infrastructure requirements are to be secured through CIL/ s106/planning conditions as appropriate.</u></p>	<p>No</p>	<p>Not applicable; no change to stage 1</p>	<p>This drafting correction merely removes two references to the collection of contributions, and re-inserts one of the references at the very end of the policy. It does not materially change Policy 6, which continues to promote a positive outcome for a number of groups by providing affordable housing, sustainable transport modes and green infrastructure.</p>
<p>MM20</p> <p>Policy 7: Shoreham Airport</p>	<p>Addition: <u>Where possible</u>, ecological enhancements should be incorporated as an integral part of the development.</p>	<p>No</p>	<p>Not applicable; no change to stage 1</p>	<p>This addition brings the policy in line with the NPPF. It does not materially change Policy 7 which continues to promote a positive outcome for a number of groups because of the provision of new employment opportunities and sustainable modes of transport.</p>

MM21 Policy 7: Shoreham Airport	Addition: ...Infrastructure requirements are to be addressed through s106/ <u>CIL</u> / planning conditions as appropriate.	No	Not applicable; no change to stage 1	This addition allows the Council to retain some flexibility in how contributions are sought until it has considered CIL in more detail. The method of collection does not affect the fact that development will be expected to contribute to infrastructure requirements. The change does not materially change Policy 7 which continues to promote a positive outcome for a number of groups because of the provision of new employment opportunities and sustainable modes of transport.
MM22 Policy 8: Shoreham Harbour Regeneration Area	Clarification: ...1100 new dwellings within Shoreham Harbour Regeneration Area <u>Western Harbour Arm</u> A total of approximately Approximately 16,000 sqm of employment generating uses.....	No	Not applicable; no change to stage 1	This clarifies that the new dwellings will be provided in the Western Harbour Arm of the Shoreham Harbour Regeneration Area. This does not materially change Policy 8 which has a potentially positive impact for most groups.
MM23 Policy 8: Shoreham Harbour Regeneration Area	Update: ...within Adur District during the plan period to 2031 2032.	No	Not applicable; no change to stage 1	This update ensures that the Plan has a 15 year time-span post anticipated adoption in 2017 in line with national policy. It does not change the Policy's overall provision.
MM24 Policy 8: Shoreham Harbour Regeneration Area	Clarification: A total of a Approximately 16,000 sqm of employment generating uses.....	No	Not applicable; no change to stage 1	This is the correction of a drafting error and makes no material difference to the policy.

MM25 Policy 8: Shoreham Harbour Regeneration Area	Update: ...provided up to 2031-2032.	No	Not applicable; no change to stage 1	This update ensures that the Plan has a 15 year time-span post anticipated adoption in 2017 in line with national policy. It does not change the Policy's overall provision.
MM26 Policy 8: Shoreham Harbour Regeneration Character Area 5	Clarification: ... To designate Southwick Waterfront as a strategic employment area (Strategic Site 3) ...	No	Not applicable; no change to stage 1	The Local Plan does not use the term 'strategic sites' in relation to those sites within the Shoreham Harbour Regeneration Area, and could cause confusion with the Local Plan's strategic sites. The reference has therefore been removed. This does not materially change Policy 8 which has a potentially positive impact for most groups.
MM27 Policy 8: Shoreham Harbour Regeneration Character Area 7	Clarification: To designate the Western Harbour arm (Waterfront) as a strategic mixed-use area (Strategic Site 4) ...	No	Not applicable; no change to stage 1	The Local Plan does not use the term 'strategic sites' in relation to those sites within the Shoreham Harbour Regeneration Area, and could cause confusion with the Local Plan's strategic sites. The reference has therefore been removed. This does not materially change Policy 8 which has a potentially positive impact for most groups.
MM28 Supporting text to Policy 9: Para 3.1,	Addition: ... <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>	No	Not applicable; no change to stage 1	This addition recognises the changing role of town centres, and provides more flexibility to ensure their viability. It contributes to Policy 9 continuing to have a positive impact for a number of groups by strengthening local facilities and services.
MM29	Additions:	No	Not	This addition recognises the changing role of

Policy 9: Lancing	<p>... <u>and appropriate D1 (non-residential institutions) uses</u></p> <p>...<u>and appropriate D1 (non-residential institutions)</u></p>		applicable; no change to stage 1	town centres, and provides more flexibility to ensure their viability. It contributes to Policy 9 continuing to have a positive impact for a number of groups by strengthening local facilities and services.
MM30 Supporting text to Policy 11: Para 3.13 and new para 3.13a	Addition: <u>The policy below allows for A class uses as well as 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> <u>3.13a</u> However-Opportunities	No	Not applicable; no change to stage 1	Dividing the text into two paragraphs eases readability. The addition recognises the changing role of town centres, and provides more flexibility to ensure their viability. It contributes to Policy 11 continuing to have a positive impact for a number of groups by strengthening local facilities and services.
MM31 Policy 11: Shoreham-by-Sea	Additions: ... <u>and appropriate D1 (non-residential institutions) uses</u> <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> <u>and appropriate D1 (non-residential institutions) uses.</u> ...	No	Not applicable; no change to stage 1	These additions recognise the changing role of town centres, and provides more flexibility to ensure their viability. It contributes to Policy 11 continuing to have a positive impact for a number of groups by strengthening local facilities and services.
MM32	Addition:	No	Not	This addition recognises the changing role of

Supporting text to Policy 12 Para 3.34	... <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>		applicable; no change to stage 1	town centres, and provides more flexibility to ensure their viability. It contributes to Policy 12 continuing to have a positive impact for a number of groups by seeking to maintain the vitality and viability of the town centre.
MM33 Policy 12: Southwick and Fishersgate	Addition: ... and... <u>and appropriate D1 (non-residential institutions) ...</u>	No	Not applicable; no change to stage 1	This addition recognises the changing role of town centres, and provides more flexibility to ensure their viability. It contributes to Policy 12 continuing to have a positive impact for a number of groups by seeking to maintain the vitality and viability of the town centre.
MM34 Supporting text for Policy 21: Para 4.27	Update: ... The Objectively Assessed Need (OAN) for Housing: Adur District (2015) report <u>together with the Objectively Assessed Housing Need Update 2016 (which uses the rebased 2014 Sub-National Population and Household Projections)</u> builds on this work...	No	Not applicable; no change to stage 1	This recognises new evidence in the form of an updated report which determines a higher OAN figure. The OAN figure does not affect the spatial strategy or the scale of development proposed in Adur because the local plan area is unable to accommodate growth to meet its full OAN. Policy 21: Housing Mix and Quality has not been changed and continues to promote a positive outcome for a number of groups through the provision of a mix of house types and more accessible and adaptable housing.
MM35 Supporting text for Policy 21: Para 4.29	Update: The findings from the OAN reports suggest that <u>for market housing</u> ...	No	Not applicable; no change to stage 1	This recognises new evidence (Objectively Assessed Housing Needs Update (2016)) that supplements the Objectively Assessed Housing Needs Study 2015. It does not affect the spatial strategy or the scale of development proposed in Adur because the local plan area is unable to accommodate growth to meet its full OAN. Policy 21: Housing Mix and Quality has not been changed and continues to promote a positive outcome for a number of groups

				through the provision of a mix of house types and more accessible and adaptable housing.
MM36 Supporting text for Policy 21: Para 4.29	Correction: ... However, at a district wide level , <u>within the Local Plan area</u> future delivery of market housing should reflect the following mix:...	No	Not applicable; no change to stage 1	This corrects a drafting error and has no impact on Policy 21: Housing Mix and Quality which continues to promote a positive outcome for a number of groups through the provision of a mix of house types and more accessible and adaptable housing.
MM37 Supporting text for Policy 21: Para 4.29	Update: ... <ul style="list-style-type: none"> ● 1-bed properties: <u>5-10%</u> ● 2-bed properties: <u>40-45%</u> ● 3-bed properties: 35% <u>40-45%</u> ● 4-bed properties: <u>5-10%</u> ...	No	Not applicable; no change to stage 1	This reflects the findings of the OAN update (2016). The Health and Equalities Impact Assessment of Policy 21, Housing Mix and Quality, remains unchanged - it continues to promote a positive outcome for a number of groups through the provision of a mix of house types and more accessible and adaptable housing.
MM38 Supporting text for Policy 21: Para 4.30	Update: The OAN <u>2016</u> report indicates that the population of Adur is ageing with <u>a greater proportion of the population in age groups 65+</u> the 75+ age group showing the greatest proportional increase over the Plan period.	No	Not applicable; no change to stage 1	This reflects updated evidence. It does not change Policy 21: Housing Mix and Quality which continues to promote a positive outcome for a number of groups through the provision of a mix of house types and more accessible and adaptable housing.
MM39 Supporting text for Policy 22: Para 4.40	Addition: ... <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>	No	Not applicable; no change to stage 1	This reflects updated evidence. It does not change Policy 22: Affordable Housing, and the overall assessment of impact remains the same. This is because, whilst affordable housing provision has the potential to be positive for a number of groups, it also has a negative impact on the wider population due to part of a limited resource (housing supply) being ring fenced for certain groups. As the

				stage 2 assessment of the Health and Equalities Impact Assessment March 2016 states, the intention to earmark some housing for those in need of affordable homes cannot be viewed as disproportionate considering the extent of affordable housing need.
MM40 Supporting text for Policy 22: Para 4.40A	Update: 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. 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	No	Not applicable; no change to stage 1	This reflects updated evidence. It does not change Policy 22: Affordable Housing, and the overall assessment of impact remains the same. This is because, whilst affordable housing provision has the potential to be positive for a number of groups, it also has a negative impact on the wider population due to part of a limited resource (housing supply) being ring fenced for certain groups. As the stage 2 assessment of the Health and Equalities Impact Assessment March 2016 states, the intention to earmark some housing for those in need of affordable homes cannot be viewed as disproportionate considering the extent of affordable housing need.
MM41 Supporting text for Policy 22: Para 4.40c	Update: 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:	No	Not applicable; no change to stage 1	This reflects updated evidence. It does not change Policy 22: Affordable Housing, and the overall assessment of impact remains the same. This is because, whilst affordable housing provision has the potential to be positive for a number of groups, it also has a negative impact on the wider population due to part of a limited resource (housing supply)

	<ul style="list-style-type: none"> • 1 bed dwellings 20-25% • 2 bed dwellings 30-35% • 3 bed dwellings 30-35% • 4 bed dwellings 10-15% <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="421 616 1003 987"> <thead> <tr> <th></th> <th><u>1 bed-room</u></th> <th><u>2 bed-room</u></th> <th><u>3 bed-room</u></th> <th><u>4+ bed-room</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> </tbody> </table>		<u>1 bed-room</u>	<u>2 bed-room</u>	<u>3 bed-room</u>	<u>4+ bed-room</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>			<p>being ring fenced for certain groups. As the stage 2 assessment of the Health and Equalities Impact Assessment March 2016 states, the intention to earmark some housing for those in need of affordable homes cannot be viewed as disproportionate considering the extent of affordable housing need.</p>
	<u>1 bed-room</u>	<u>2 bed-room</u>	<u>3 bed-room</u>	<u>4+ bed-room</u>															
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<u>Social/ Affordable Rent</u>	<u>30%</u>	<u>40%</u>	<u>25%</u>	<u>5%</u>															
<p>MM42 Supporting text to Policy 28 new Para 4.66a</p>	<p>Addition: <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</u></p>	<p>No</p>	<p>Not applicable; no change to stage 1</p>	<p>This addition recognises the changing role of town centres, and provides more flexibility to ensure their viability. It contributes to Policy 28 continuing to have a positive impact for a number of groups by seeking to support the retention of a range of local services and reduce the need to travel.</p>															

	<p><u>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>			
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