ISSUE 18: IMPLEMENTATION, VIABILITY AND MONITORING

- In order for the plan to be found sound it must be effective. In order to test its effectiveness over the course of the plan period it must be capable of appropriate monitoring. Appendix 5 (delivery, implementation and monitoring) confirms that a Monitoring Report will be prepared annually but it is not clear what actions may be taken if the expected outcomes of the individual policies (or targets) are not being achieved. How will the Council take action, to address any such problems that arise, in a timely fashion.
- 18.1.1 By regularly monitoring the Plan there will be the opportunity to identify particular issues that are preventing policies delivering expected outcomes or affecting the delivery of the spatial strategy. In terms of relevant policies not achieving expected outcomes, the Council would look at a range of measures to try and address the issues identified. This would include possibly providing additional policy guidance in the form of Supplementary Planning Documents (SPDs) or providing technical notes if there was a requirement for any further policy clarification. New legislation or further changes to Permitted Development rights may require the Council to review its approach and may require the possible use of Article 4 Directions to ensure greater control over the loss of certain land uses. The Council has taken this approach in the past and would look to proactively address any issues that arise from monitoring the policies of the Plan.
- 18.1.2 In terms of addressing any key delivery issues, the Council has sought to anticipate any such issues through taking a proactive approach to plan making. This is evidenced by the Council's willingness to work with site promoters to make funding bids to Government to help deliver key sites such as New Monks Farm and Shoreham Harbour. The Council has also been keen to make the most effective use of the Council's land assets. The redevelopment of the Civic Centre site to deliver new offices and residential accommodation as well as bringing forward additional affordable housing through a Housing Renewal Programme demonstrates its commitment to deliver sustainable economic growth.
- 18.1.3 By continuing to work with site promoters and taking a positive approach to bringing forward development at Shoreham Harbour, the Council is confident that it can deliver the expected outcomes of the Plan. Partnership working between the District Council, West Sussex County Council and the LEP will also help to ensure the delivery of strategic sites. The Growth Deal being negotiated with West Sussex will ensure that additional resources will be available to help deliver these key sites and address any delivery issues and the LEP is investigating setting up its own Development Company to help deliver stalled sites.
- 18.2 What are the main risks to delivery? The Council does not appear to have a fallback position, although there is a reference to undertaking an early review of the Plan. Could the Council clarify what an early

review would achieve that cannot be achieved in the current circumstances. What would be the trigger for a review of the ALP? (see also question 3.8)

- 18.2.1 As stated previously it is not possible to identify reserve sites or have a fallback position for new housing and employment floorspace in view of the significant environmental constraints on the Local Plan area (see question 7). As a result the Council has taken significant steps to ensure the delivery of its key sites and it remains confident on the delivery of its overall strategy and a fallback position is not required or available.
- 18.2.2 The Council's confidence is primarily due to the fact that the two allocated strategic sites are being pursued by national house builders who are in detailed pre-application discussions with the Council's Development Management team. These developers have been working on these sites for many months and have undertaken detailed financial appraisals and have assessed delivery risks. The broad allocation at Shoreham Harbour also has a large site owned by a regional Registered Provider (RP) and following two public consultation exercises is due to submit a detailed application for approximately 450 apartments and commercial floorspace. The Port Authority has also recently sold a site for mixed use development at the eastern end of the Western Harbour Arm to a residential developer.
- 18.2.3 The main risks to the delivery of the plan are likely to be viability issues as highlighted by the WPV and CIL report (CD/24/11). However steps have been taken to mitigate these risks. Shoreham Harbour has been a key brownfield site which has seen funding from both Growth Point and Ecotown Government sponsored projects and secured £3.5 million towards a comprehensive flood defence solution in Round 1 Local Growth Fund. Adur and Worthing Councils also secured West Sussex County Council and LEP support for 3 bids totally over £25 million and the Council is hopeful that these bids will be successful following the autumn statement in November 2016. As indicated elsewhere two of these bids will help to deliver the strategic development sites at Shoreham Harbour and New Monks Farm.
- 18.2.4 If further funding issues are highlighted and affect delivery then the Council is prepared to make further funding bids to the LEP to help address any key infrastructure issues. The LEP has recently commenced a bidding process for; in excess of £46 million (underspend on Round 1 Local Growth Fund projects). A bid has been submitted for funding for the Civic Centre office redevelopment and further bidding rounds are available for the next two years.
- In the unlikely event that one of the key Local Plan sites does not come forward, then the Council could consider an early review of the Plan and this is likely to involve further dialogue with neighbouring authorities under the duty to co-operate requirement. Other options would be extremely limited in view of the lack of available land in the Local Plan area.