

CD07-04 Rev A: Major Modifications Proposed, Amended 31 Jan 2017

The modifications below are expressed in the conventional form of ~~strickethrough~~ for deletions and underlining for additions of text.

The page numbers and paragraph numbering in the second and third columns refer to those in the submission local plan, and do not take account of the deletion or addition of text.

The table below includes the submitted Main Modifications dated October 2016 plus additional proposed Main Modifications. The references assigned to those dated October 2016 remain unchanged. Additional Main Modifications have been inserted with the reference A/B/C (etc.) so they can easily be identified. Where additional Modifications supersede those previously submitted this has been indicated in the reference column, and the row of the superseded Modification ~~struckthrough~~.

Ref	Page	Policy/ Paragraph	Main Modification
MM1	12	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. <u>Net gains in natural capital will have been delivered.</u>
MM1A	13	O1	Up to 2034 2 ...
MM2	19	Policy 2	Up to 2034 2 ...
MM3	19	Heading	<u>HOUSING PROVISION 2011- 20342</u>
MM4	20	2.13	The most up-to-date work on OAN, and that which is used in this Local Plan, is the Objectively Assessed Need for Housing: Adur District 2015 study <u>Objectively Assessed Housing Need Update 2016</u>
MM5	20	Footnote (linked to para 2.13)	3 Objectively Assessed Need for Housing: Adur District 2015. <u>Objectively Assessed Housing Need Update 2016</u> ³ (GL Hearn).

MM6	20	2.14	This 2015 2016 study uses an updated set of demographic projections, taking account of information including 2012 2014 -based Sub-National Population Projections (March 2014 May 2016) and the 2012 based Household Projections (February 2015 July 2016). It also takes account of the Government's Planning Practice Guidance published in 2014. This study supersedes all previous Objectively Assessed Need Assessments.
MM7	20	2.16	In terms of Adur's Objectively Assessed Needs the study recommends the delivery of 291 325 dwellings per annum 5820 6,825 dwellings over the Plan period). This represents 'demand' for new housing.
MM8	20	2.16A	The OAN 2016 assessment of housing need suggests that for C2 uses such as residential care and nursing homes there is a potential need for 29 38 bedspaces over the plan period 2011-2034 2 which equates to 1-2 per annum.
MM8A	20	2.17	It indicates that, on brownfield sites, 291 254 (net) dwellings could be delivered.....
MM8B	21	2.18	...as follows: <ul style="list-style-type: none"> • <i>Dwellings completed since 1 April 2011....</i>A total of 559 528 net new homes have been completed between 1st April 2011 and 31st March 2016 2015. • <i>Number of dwellings identified through existing planning permissions (commitments)....</i>A total of 439 326 (net) additional homes will be provided through existing planning consents.
MM8C	21	2.19in order to avoid double counting the remaining 968 970 (rounded) dwellings....
MM9 (superseded by MM9A)	22	2.20	This clearly indicates that, when measured against Adur's Objectively Assessed Needs figure of 5820 6,825 dwellings over the Plan period, the amount of residential development that can be delivered on brownfield sites results in a considerable shortfall of 4,296 3291 dwellings
MM9A	22	2.20	By assessing these various sources of housing supply, Table 1 below demonstrates that 2529 2638 dwellings can be..... This clearly indicates that, when measured against Adur's Objectively Assessed Needs figure of 5820 6,825 dwellings over the Plan period, the amount of residential development that can be delivered on brownfield sites results in a considerable shortfall of 4,296 4187 3291

MM10 (superseded by MM10A)	22	2.22	... Taking these greenfield sites into account the Plan can deliver 3609 dwellings (172 180 dpa), leaving a shortfall of 2211 3,216 dwellings.
MM10A	22	2.22	...Taking these greenfield sites into account the Plan can deliver 3718 3609 dwellings (177 dpa 172 180 dpa), leaving a shortfall of 3107 3216 dwellings.
MM11 (superseded by MM11A)	22	Table 1	<p>Table 1 – Housing supply over the Local Plan Period 2011-2031 2</p> <p>Sources of Housing Supply</p> <p>Dwellings completed (net) 2011–2015 –528</p> <p>Existing commitments (large and small sites where planning permission has been granted) –326</p> <p>Sites identified in the SHLAA (net) 2015 –291</p> <p>Windfall allowance –416</p> <p>Sites to be identified in Local Plan:</p> <p>Shoreham Harbour Broad Location –968</p> <p>New Monks Farm Strategic Allocation –600</p> <p>West Sompting Strategic Allocation –480</p> <p>Total Housing Supply (Delivery Target) 2011-2031 2 –3609 (annual target –180 172)</p>

MM11A	22	Table 1	Table 1 – Housing supply over the Local Plan Period 2011-2034-2	
			Sources of Housing Supply	Number of dwellings
			Dwellings completed (net 2011- 2015 2016)	559 528
			Existing commitments (large and small sites where planning permission has been granted)	439 326
			Sites identified in the SHLAA (net) 2015 2016	254 294
			Shoreham Harbour Broad Location	970 968
Total Housing Supply (Delivery Target) 2011-2034 2		3718 3609 (annual target 177 172 180		
MM12	22	2.23	Consequently the Local Plan is not able to meet the full objectively assessed housing needs figure of 5820 6825 dwellings	
MM13 (superseded by MM13A)	23	Policy 3	<p>Policy 3: Housing Provision</p> <p>Over the period 2011 – 2034-2 a minimum of 3609 dwellings will be developed in Adur, as follows:</p> <ul style="list-style-type: none"> • 1429 within the built up area of Adur • 1100 as part of the Shoreham Harbour Regeneration Area Western Arm • 600 at New Monks Farm • 480 at West Sompting 	

MM13A	23	Policy 3	<p>Policy 3: Housing Provision</p> <p>Over the period 2011-20342 a minimum of 3718 3609 dwellings will be developed in Adur, as follows:</p> <p>1538 1429 within the built up area of Adur</p>
MM14 (superseded by MM14A)	23	2.24	The figures in Policy 3 above equate to an annual target of 180 172 dwellings per year over the 201 year plan period.
MM14A	23	2.24	The figures in Policy 3 above equate to an annual average of 177 172 180 dwellings per year over the 20 1 year plan period.
MM15	29	Policy 4	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 floorspace for appropriate employment generating uses in Adur...
MM16	29	Policy 4	up to 2034 2 at the following locations:
MM17	34	Policy 5	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. 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.
MM18	39	Policy 6 Second bullet point	<ul style="list-style-type: none"> ...A27 Sompting Bypass/ Upper Brighton Road (Lyons Farm junction), A27/ Dankton Lane junction, and enhancement of the traffic calming scheme in West Street.

MM19	41	Policy 6	<p>.....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 appropriate</p> <p>....and 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>
MM20	46	Policy 7	<p>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. <u>Where possible,</u> ecological enhancements should be incorporated as an integral part of the development.</p>
MM21	47	Policy 7	<p>Infrastructure requirements are to be addressed through s106/<u>CIL</u>/ planning conditions as appropriate.</p>

MM21A	55	Policy 8	<p>Shoreham Harbour Regeneration Area is identified as a broad location for change_ within this Local Plan. This policy identifies the regeneration proposals for the Shoreham Harbour Regeneration Area that will be delivered over the plan period. <u>Adur District Council will work in partnership with Brighton & Hove City Council, West Sussex County Council and Shoreham Port Authority to support the regeneration of the area.</u></p> <p>The District Council will work with Brighton & Hove City Council, West Sussex County Council, Shoreham Port Authority and other key partners to support the long term regeneration of Shoreham Harbour and immediately surrounding areas.</p> <p>A Joint Area Action Plan is currently being prepared which will contain a harbour wide spatial strategy, area wide policies and proposals and priorities for individual character areas. The plan will be underpinned by a delivery strategy to address a range of issues, including the provision of infrastructure. <u>The regeneration partnership will prepare a Joint Area Action Plan (JAAP) for the regeneration area. The plan will be jointly adopted by Adur, Brighton & Hove and West Sussex County Councils.</u></p> <p><u>The JAAP will include a spatial strategy, area-wide policies, and specific proposals for individual character areas within the regeneration area. The plan will be underpinned by a delivery strategy to address a range of issues, including the provision of infrastructure.</u></p> <p>As part of the process of preparing the Joint Area Action Plan, development briefs have been adopted for key areas of change within the harbour, setting out guiding principles for development. Developments will be encouraged that are consistent with the Vision and Strategic Objectives as set out in the emerging JAAP and the guiding principles within the adopted development briefs. <u>The Council will encourage developments that are consistent with the vision, strategic objectives and area priorities in the JAAP.</u></p>
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MM22	55	Policy 81100 new dwellings within the Shoreham Harbour Regeneration Area <u>Western Harbour Arm</u>
MM23	55	Policy 8	...within Adur District during the plan period to 2034 <u>2</u> .
MM24	55	Policy 8 A total of a <u>A</u> pproximately 16,000 sqm of employment generating uses.....
MM25	55	Policy 8	...provided up to 2034 <u>2</u> .
MM25A	55-56	Policy 8	New development at the harbour will be expected to meet high standards of environmental efficiency and a Sustainability Statement will be required as supporting information to accompany all development proposals in the parts of the Shoreham Harbour Regeneration Area within Adur. The Sustainability Statement should be set out in accordance with the Sustainability Statements Guidance Note for Shoreham Harbour Regeneration Area (July 2013).
MM26	57	Policy 8 Character Area 5	To designate Southwick Waterfront as a strategic employment area (Strategic Site 3).
MM27	58	Policy 8 Character Area 7	To designate the Western Harbour Arm (Waterfront) as a strategic mixed-use area (Strategic Site 4).
MM28	61	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. <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>

MM29	63	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"> • A1 (shops) • A3 (food and drink), A4 (drinking establishments) <u>and appropriate D1 (non-residential institutions) uses</u> 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. <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"> • A1 (shops) • A2 (financial and professional services), A3 (food and drink), A4 (drinking establishments), A5 (hot food takeaways) <u>and appropriate D1 (non-residential institutions) uses</u> 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.
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MM30	65	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.</p> <p><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></p> <p><u>3.13a</u> However 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.¹ 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>
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MM31	69	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"> • A1 (shops) • A3 (food and drink) <u>and appropriate D1 (non-residential institutions) uses</u> 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. <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"> • A1 (shops) and A3 (food and drink). • <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> <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"> • A1 (shops), A2 (financial and professional services), A3 (food and drink), A4 (drinking establishments), and A5 (hot food takeaways) <u>and appropriate D1 (non-residential institutions) uses.</u>
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MM32	72	Para 3.34	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. <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>
MM33	73	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) <u>and appropriate D1 (non-residential institutions)</u> uses will also be permitted where they would not have an adverse impact on the vitality and viability of the town centre.
MM34	91	4.27	... 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...
MM35	92	4.29	The findings from the OAN reports suggest that <u>for market housing...</u>
MM36	92	4.29	... However, at a district wide level, <u>within the Local Plan area</u> future delivery of market housing should reflect the following mix:
MM37	92	4.29	<ul style="list-style-type: none"> • 1-bed properties: <u>5-10%</u> • 2-bed properties: <u>40-45%</u> • 3-bed properties: <u>40-45%</u> 35% • 4-bed properties: <u>5-10%</u>
MM38	92	4.30	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+ the 75+ age group showing the greatest proportional increase over the Plan period.</u>

MM39	95	4.40	<p>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. <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></p>
MM40	95	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. <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> 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</p>

MM41	95/96	4.40C	<p>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:</p> <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="651 907 1520 1229"> <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	108	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>																				

MM42A	109	Policy 28	New development for town centre uses outside of the defined town centre boundary (or Primary Shopping Area in the case of retail uses) will be assessed in accordance with the National Planning Policy Framework sequential test. and impact tests. An impact test assessment will be required for any proposed retail development outside of the Primary Shopping Area with a net sales floorspace of 1000sqm or more.
MM42B	120	Policy 33	<p>The loss of existing open space, or sports and recreation buildings/facilities will be resisted unless:</p> <ul style="list-style-type: none"> i. The development is for alternative sports and recreational provision, the need for which clearly outweighs the loss; or ii. An assessment has been undertaken which clearly shows the open space, buildings or land to be surplus to requirements <u>and not required to meet any other shortfalls in open space types; or</u> iii. and is not required to meet any other shortfalls in open space types; or iv. iii. The loss resulting from the proposed development would be replaced by equivalent or improved provision in terms of quantity and quality in a suitable location.
MM42C	127	4.126	The SFRA recommends that a detailed site specific flood risk assessment be submitted with planning applications as set out in the policy below. This approach goes beyond national guidance but is considered appropriate given the surface water and groundwater issues in the area.

MM42D	219	Appendix 7: Glossary	<p>Travel Plan:</p> <p>'A Travel Plan is a long-term management strategy for an organisation or site that establishes a structured strategy with clear objectives, supported by suitable policies, which ensures that sustainable transport objectives are delivered through action.'</p>
MM42E	219	Appendix 7: Glossary	<p>Workplace Travel Plans:</p> <p>'A workplace Travel Plan is a living document involving the identification of an appropriate package of 'stick' and 'carrot' measures aimed at promoting sustainable travel, with an emphasis on reducing reliance on single occupancy car journeys for commuting and business travel.'</p>