

## **ISSUE 1: THE DUTY TO CO-OPERATE (LEGAL REQUIREMENT) AND THE COUNCIL'S BROAD SPATIAL STRATEGY (POLICY 2)**

**1.1 Has co-operation between Adur District Council and other nearby local planning authorities been a continuous process of engagement from initial thinking? What evidence is there of effective co-operation (NPPF paragraph 181) and of joint working on areas of common interest being diligently undertaken for the mutual benefit of neighbouring authorities (NPPF paragraph 178)? Is there a long-term commitment to co-operation?**

1.1.1 Adur District is located on the coast between Brighton & Hove City to the east and Worthing Borough to the west. The South Downs National Park lies in the northern part of the District and the English Channel to the south with the low lying land of the Adur Valley separating the settlements of Lancing and Sompting to the west from Shoreham-by-Sea, Southwick and Fishersgate to the east. As a result of these landscape constraints, and other factors such as the pattern of existing built development, flood, drainage, and the South Downs National Park to the north (which covers part of the District) the Adur Local Plan area is heavily constrained.

1.1.2 The Local Plan seeks to deliver a package of measures over the plan period in order to work towards meeting the objectively assessed needs for development in Adur as far as possible, taking into account environmental assets and constraints and the capacity of infrastructure. The plan aims to achieve a balance between providing development whilst also retaining and where possible enhancing Adur's character. Policy 2 of the Submission Adur Local Plan (SALP (CD07/1) sets out the overall spatial strategy for the delivery of development in Adur over the Plan period. It guides development within, and in the case of the strategic allocations, adjacent to Adur's settlements, in order to manage the pattern of development by preventing coalescence, which will help to maintain existing character. It describes how new development will be distributed in Adur and is supported by the Sustainability Appraisal (CD07/2). Realistic options for locating development are extremely limited due to the compact size of the local plan area and its constrained location between the South Downs National Park and the sea. There are few real choices in terms of different locations or strategies if the Plan is to go as far as it can to contribute to meeting objectively assessed housing needs and employment floorspace, balanced against avoiding coalescence which would result in the loss of the individual distinctive character of settlements in Adur.

1.1.3 Adur lies within the Coastal Sussex Housing Market Area (HMA), which also includes Chichester, Arun, Worthing, Brighton & Hove and Lewes. It is

apparent that the HMA as a whole, is unable to meet its OAN. Other Local Planning Authorities (LPAs) in the HMA (Brighton & Hove, Lewes and Chichester) have recently adopted Local Plans despite having housing shortfalls. (Please see Table 1 of Adur District Council response to Inspector's Additional Question 3). Worthing Borough Council is currently reviewing its Local Plan, and is likely to have considerable shortfall. It is clear that within the sub-region that there is an inability for some authorities, particularly those located along the narrow coastal strip, to deliver all objectively assessed needs, particularly for housing. This situation is not unique to Adur.

#### Co-operation Via Formal Sub-Regional Group Mechanisms

- 1.1.4 Collaboration between local authorities in this area did not commence with the introduction of the Duty to Co-operate. There has been a history of co-operation and joint working in West Sussex, ranging from formal partnerships (such as the Coastal West Sussex Partnership) to officer groups such as West Sussex Chief Officers Group, the Planning Policy Officers Group, and CIL Officers Sub-Group (please see paragraph 3.14 of the Duty to Co-operate Statement (CD07/18) for more examples). Adur is also part of the Coast to Capital Local Enterprise Partnership, Greater Brighton City Deal, Greater Brighton Economic Board; and Shoreham Harbour Regeneration Partnership. Adur is also covered by the Greater Brighton Proposed Devolution Agreement and the Three Southern Counties devolution proposals. The Council has a close working relationship with West Sussex County Council (WSCC), which has developed a Draft Place Plan for Adur (CD24/9), which is designed to help the County Council manage its investment priorities to support growth in Adur more effectively).
- 1.1.5 Following the revocation of the South East Plan, LPAs in the sub-region recognised at an early stage that there was a need for a new formal, structured approach to strategic planning (and investment) issues. As a result the Coastal West Sussex and Greater Brighton Strategic Planning Board was established (inaugural meeting held October 2012). Although only an advisory body, this forum has acted as a proactive and focussed arena for ongoing engagement and collaboration between the local authorities involved (in addition to close working relationships between Coastal West Sussex Partnership, Coast to Capital Local Enterprise Partnership and Greater Brighton Economic Board).

The Board's remit is to:

- identify and manage spatial planning issues that impact on more than one local planning area within CWS&GB; and
- support better integration and alignment of strategic spatial and investment priorities in CWS&GB, ensuring that there is a clear and defined route through the statutory local planning process, where necessary.

- 1.1.6 A Local Strategic Statement for the Greater Brighton and Coastal West Sussex area was first agreed in 2013, with the aim of guiding strategic planning decisions, (Annex 6, Ref 3.2 of DTC Statement CD07/18). There was a clear commitment from all authorities to develop an LSS that had a direct influence on individual local plans but also highlighted the strategic challenges along the coast, with possible ways of addressing these. The LSS sets priorities and objectives for the area, and demonstrated the commitment to partnership working on spatial planning issues across the area. (This statement has been used as a best practice case by the Planning Advisory Service, and was winner of the 2014 RTPI Award for Planning Excellence for 'innovative planning practice in plan making'). (LSS also recognises the important role of Local Green Gaps in the Adur Local Plan area).
- 1.1.7 A Housing (Duty to Co-operate) Study completed in 2013 (CD08/3) provided a critical review of the objectively assessed needs for each LPA, concluded that the area is highly constrained due to the fact that it is tightly bound by the English Channel and the South Downs National Park and that meeting the housing needs of the area will become increasingly challenging.
- 1.1.8 A 'refresh' of the LSS was undertaken in 2015 (Coastal West Sussex and Greater Brighton Local Strategic Statement January 2016 - known as LSS2 - CD03/1) which covers the period 2015-2031, in order to reflect the progression of local plans in the area and implementation of the Greater Brighton City Deal (which was at an early stage when LSS was initially prepared), and the fact that the strategic geography covered by the LSS now includes the districts of Mid-Sussex and Horsham (which joined the CWSGB Strategic Planning Board in 2014 and 2015 respectively). Evidence to inform the review was commissioned and completed by consultants Nathaniel Lichfield. The refreshed LSS2 covers the Local Planning Authorities of Arun DC, Adur DC, Brighton and Hove CC, Chichester DC, Horsham DC, Lewes DC, Mid-Sussex DC, the South Downs National Park Authority, West Sussex CC and Worthing BC.

1.1.9 The refreshed LSS sets out the long-term, integrated strategic planning and investment priorities for the CWS&GB area, and supports the monitoring requirement of the Growth Deal. The refreshed LSS was approved by the CWS&GB Strategic Planning Board supported by the CWS Partnership and Greater Brighton Economic Board in January 2016. Individual local authorities approved LSS2 in the first part of 2016. (A monitoring and delivery framework has been produced, and was approved by the SPB in January 2016. The review of the LSS is discussed in more detail in paras 2.14 – 2.17 of the Duty to Co-operate Statement).

(Please see below for examples of joint working below, which illustrate some of the outputs of this collaborative working. A 'Summary of Strategic Planning Activities in Coastal West Sussex and Greater Brighton' commencing in October 2012, is listed in Appendix 1 of the Adur Duty to Co-operate Statement).

#### Engagement outside of these Formal mechanisms

1.1.10 In addition to this forum, Adur District Council has sought to engage with other local authorities in the sub-region on a 'one to one' basis through meetings to discuss 'wider than local' matters. These have provided each local authority an opportunity to understand the other's position in terms of key matters such as housing (and any shortfalls/capacity), employment, etc. These meetings have been held at officer, and in some cases, Member-level. (Details can be found in Appendix 2 of the Duty to Co-operate Statement, which lists all meetings relating to the Duty to Cooperate which have involved ADC since 2011). As a result of these meetings, Adur District Council has signed several MOUs with local authorities in the sub-region. These may be found in Appendix 4 of the DTC Statement. These MOUs demonstrate a shared understanding of constraints, issues and ability to deliver against OAN, as experienced by the respective authorities. (At the time of writing, an MOU with Arun District Council is in the process of being signed).

1.1.11 Further evidence of this ongoing joint working on areas of common interest can be found in the formal studies/ work commissioned:

- The Council has worked in partnership with other local authorities in the Coastal West Sussex strategic housing market area to prepare the Coastal West Sussex Strategic Housing Market Assessment Update 2012 (CD09/5), (which followed the Strategic Housing Market Area Assessment 2009) .

- Duty to Co-operate Housing Study 2013 (CD07/18).
- Gypsy and Traveller Accommodation Assessment Phases 1 and 2 (2013); Update report to Phase 1 (2014); Study into Transit Accommodation in West Sussex (See CDs 09/6, 09/7 and 09/8). (As a result of this work a permanent transit site has been established at Westhampnett, Chichester district, to address cross-boundary needs for this type of accommodation).
- Nathaniel Lichfield work, 2015 includes Housing Background Paper and Transport System Background Paper May 2015.
- LSS Monitoring and Delivery Framework produced in 2015, agreed early 2016 which forms Annex of refreshed LSS CD03/1. (LSS2 2016).
- A detailed review of the Housing Market Areas (HMAs) and Functional Economic Market Areas (FEMAs) operating within and across the Strategic Planning Board authorities has been commissioned by the Strategic Planning Board. It is intended that analysis of the functional geography of the area will facilitate a clearer definition of the boundaries of the area that should be covered by the LSS update. The study will also provide the authorities with a sound basis for undertaking future housing and economic need assessments. Draft findings will be made available in January 2017; the final report will be presented to Strategic Planning Board 6 February 2017.
- The Council's response to Inspector's Additional Question 3 also outlines the Council's involvement in a number of specific joint measures to accelerate housing delivery - see section 5.

1.1.12 In terms of 'long-term commitment', it can clearly be shown that there has been a firm commitment to consider and address strategic issues over several years. This has been on-going long before any formal requirement under the 'Duty to Co-operate'. However, consideration of, and solutions for, strategic issues does not stop with the adoption of this or any other Development Plan. As explained below, this is an iterative, on-going process and there is a firm commitment from authorities across to address and resolve strategic issues in the future.

1.1.13 In this context, and in addition to LSS2 referred to above, there is recognition that a full review of the Local Strategic Statement will be required at some point in the near future to address the longer term issues and this may require a different spatial strategy. The strategic context and priorities are likely to change given Government policy changes, particularly in relation to housing, as well as current devolution proposals from Greater Brighton and also from Three Southern Counties (West Sussex, East Sussex and Surrey) Please see ADC response to Inspector's Additional Question 3). The review will have to address the continuing gap between

objectively assessed housing needs and housing delivery in the sub-region and the continuing challenges around supporting sustainable economic growth and infrastructure investment.

1.1.14 A report setting out the options for taking this work forward was presented to the Strategic Planning Board on 18th July 2016. It was resolved that the Board supports the principle of preparing a Local Strategic Statement 3, but that the decision is postponed until early 2017 to allow more consideration of the form/ content/ coverage, and subject to the outcomes of work to be commissioned which will review the boundaries of the SHMA/s in the sub-region. As referred to above, the Board has commissioned a detailed review of the Housing Market Areas (HMAs) and Functional Economic Market Areas (FEMAs) operating within and across the Strategic Planning Board authorities. It is intended that analysis of the functional geography of the area will facilitate a clearer definition of the boundaries of the area that should be covered by the LSS update. The study will also provide the authorities with a sound basis for undertaking future housing and economic need assessments.

1.1.15 In conclusion, the Council considers there has been active and sustained engagement with other local authorities (both on a one-to-one basis, and through collaborative mechanisms) within the housing market area, and beyond. This has developed from a history of collaboration. There is a commitment to ongoing joint working, based on the Strategic Planning Board and Local Strategic Statement mechanisms.

## **1.2 Have cross-boundary strategic priorities and matters been identified? If so are they clearly reflected in the ALP (NPPF paragraph 156)?**

1.2.1 The following is a list of the strategic spatial issues relevant to Adur, as set out in Chapter 3 of the Adur DTC Statement:

- Housing Needs and Provision
- Gypsy and Traveller Accommodation
- Employment Needs and Provision
- Regeneration – Shoreham Harbour and Shoreham Airport
- Transport
- Countryside (particularly in relation to the South Downs National Park)
- Water and Waste Water
- Flood risk and defences
- Green infrastructure
- Minerals and Waste

- 1.2.2 A number of the above issues are defined in the DTC Statement as 'key' issues since they are spatially wide ranging (with cross boundary impacts) and/or more complex to deliver. These are Housing Needs and Provision, Gypsy and Traveller Accommodation, Employment Needs and Provision, Minerals at Shoreham Harbour, and Transport.
- 1.2.3 The above issues have been discussed at specific duty to co-operate meetings held with planning officers and lead Members for planning with other local authorities (see Annex 1, Summary of Strategic Planning Activities in Coastal West Sussex and Greater Brighton, as well as Appendix 2 - meetings and activities log). Officer meetings have been held with all West Sussex LPAs, the SDNPA, as well as with Lewes DC (see Appendix 2 – meetings and activities log). The meetings, whilst covering a number of the above issues, focussed on the key issues of housing, employment and gypsy and traveller accommodation. The purpose of these meetings has been to identify the cross boundary issues, to clarify how the issues were being addressed and the capacity of each authority to help address unmet needs. At various stages and in addition to consultation on the Adur Local Plan, letters have been sent to the relevant local authorities in the sub region to inform these of Adur's strategic needs and duty to co-operate requirements.
- 1.2.4 A series of Duty to Co-operate workshops held by the Planning Advisory Service in Horsham from July 2013 to March 2014 also addressed a number of the above issues. The outcome of these workshops was an action plan to address identified strategic issues. A number of measures in this action plan are being taken forward by the West Sussex local planning authorities including the following:
- Communicating and sharing of evidence studies and details of unmet development requirements to meet needs. (This has been on-going).
  - Up-dating the Coastal West Sussex and Greater Brighton (CWS&GB) Local Strategic Statement 2 (CD03/1) with new transport, housing and employment studies (completed and approved by the CWSGB SPB in January 2016).
  - Reviewing the membership of the CWS&GB Strategic Planning Board to better reflect the cross boundary strategic issues that the Board deals with. (The Board was widened initially to include Lewes DC and Brighton and Hove CC and latterly to include Mid Sussex DC in 2014 and Horsham DC in 2015.)
  - Greater involvement of the Coast to Capital LEP in the planning work of the CWS&GB SPB and the Greater Brighton Economic Board and the

Greater Brighton City Deal. (This has been implemented and the LEP is also involved in the current devolution bids.)

- Agreeing transport infrastructure priorities via the CWS&GB SPB. (This is also being progressed via the CWS&GB Economic Board and via infrastructure studies being undertaken by the LEP and WSCC to inform investment priorities. In addition, the Adur and Worthing Place Plans (CD24/9) also address transport needs).
- Agreements on duty to co-operate issues formalised via MoUs and Statements of Common Ground between the local planning authorities. (MoUs and Statements are in place between a number of local authorities as referred to earlier in this Statement.)

1.2.5 LSS2 (as with the first LSS) sets out long term 'strategic objectives' and the 'spatial priorities' for delivering these in the short to medium term. LSS2 states (para 1.4):

*'Many are being addressed through the planning system albeit at very different stages, but all will benefit from a co-ordinated approach across the area, both in terms of planning and investment... they also reflect the local planning authorities' clear aspirations for long term sustainable growth to meet the existing and future needs of the residents and workforce in the CWS&GB area.'*

1.2.6 The four strategic objectives of the LSS (delivering sustainable economic growth, meeting strategic housing needs; investing in infrastructure, and managing environmental assets and natural resources) are accompanied by 9 spatial priorities for the period 2015-25 (including SP1: Shoreham Harbour and Brighton Airport, Shoreham, which includes specific recognition of the important role of the Local Green Gaps in Adur). The LSS sets out a framework for investment and strategic planning 2015-2025. These spatial priorities illustrate an understanding and agreement across the partner authorities of the CWS and GB area as to opportunities, potential and functional roles of respective locations across the area in meeting housing, employment and regeneration needs.

1.2.7 How are these issues reflected in the Local Plan?

- The Duty to Co-operate is set out in paragraphs 1.21 – 1.24 of the Submission Adur Local Plan.
- Key issues for Adur are set out at paragraph 1.25 of the Submission Adur Local Plan. These include 'Duty to Co-operate' matters indicated above.

- A Vision and Objectives are set out at paragraph 1.34 of the Submission Adur Local Plan. Appendix 2 on page 141 demonstrates how each policy is related to the Vision and Objectives of the Plan.
- The following policies (and their supporting text) set out how these issues will be addressed through planning policy in Adur:

Issue	Adur Local Plan
Housing Needs and Provision	Policy 2 Spatial Strategy; Policy 3: Housing; Policy 5 New Monks Farm, Lancing; Policy 6 West Sompting; Policy 8: Shoreham Harbour Regeneration Area; Policy 21 Housing Mix and Quality; Policy 22 Affordable Housing.
Gypsy and Traveller Accommodation	Policy 24: Provision for Gypsies, Travellers and Travelling Showpeople; Policy 25: Safeguarding Existing Gypsy, Traveller and Travelling Showpeople Sites.
Employment Needs and Provision	Policy 2 Spatial Strategy; Policy 4: Planning for Economic Growth; Policy 5: New Monks Farm, Lancing; Policy 7: Shoreham Airport; Policy 8: Shoreham Harbour Regeneration Area; Policy 26 Protecting and Enhancing Existing Employment Sites and Premises. Policy 27: The Visitor Economy; Policy 28: Retail, Town Centres and Local Parades.
Regeneration - Shoreham Harbour and Shoreham Airport	Policy 2: Spatial Strategy; Policy 4: Planning for Economic Growth; Policy 7: Shoreham Airport; Policy 8: Shoreham Harbour Regeneration Area;
Transport	Policy 29: Transport and Connectivity
Countryside (In relation to the South Downs National Park)	Policy 2: Spatial Strategy; Policy 5 New Monks Farm, Lancing; Policy 6 West Sompting; Policy 7: Shoreham Airport; Policy 13: Adur's Countryside and Coast; Policy 14 Local Green Gaps.
Water and Waste Water	Policy 35: Pollution and Contamination Policy 36: Water Quality and Protection
Flood risk and	Policy 37: Flood Risk and Sustainable Drainage

defences	
Green Infrastructure	Policy 13: Adur's Countryside and Coast Policy 14: Local Green Gaps Policy 31: Green Infrastructure; Policy 32: Biodiversity Policy 33: Open Space, Recreation and Leisure
Minerals and Waste	WSSC and ESSC and BHCC Minerals Plan; Policy 8: Shoreham Harbour Regeneration Area.
<p>These policies address cross-boundary issues through delivering housing (of various types and tenures) and employment floorspace to meet identified needs and facilitate regeneration; providing and safeguarding accommodation for gypsies and travellers; safeguarding countryside and landscape character, and seeking to avoid coalescence of settlements; creating and improving green infrastructure links; and safeguarding minerals capacity.</p> <p>These policies interpret the local implications of the wider cross-boundary issues.</p>	

### **1.3 Are any mechanisms in place to enable the unmet housing needs of the District to be met elsewhere?**

1.3.1 LSS2, and the MOUs referred to above make clear that local authorities in the sub-region understand and accept the limited capacity of Adur to meet its own housing needs, and the approach taken in the Submission Adur Local Plan (CD07/1). However, other local authorities in the sub-region (including Brighton & Hove, Lewes, Crawley and Chichester) themselves experience housing shortfalls (which have been accepted through the recent adoption of their Local Plans). Furthermore, in those cases where potential capacity exists in particular local authorities, this additional capacity is likely to be utilised to address shortfalls in neighbouring districts with the strongest functional links (eg Mid-Sussex is in the process of exploring its ability to address shortfalls of Brighton & Hove and Lewes), which have strong housing market and 'Travel To Work' links to Mid-Sussex.

#### Arun District Council

1.3.2 At the time of writing, Arun District Council's Local Plan is currently being examined. With regards to housing need, Arun has been testing and assessing a range of scenarios and strategic housing sites for inclusion

within the Arun Local Plan in light of the increased requirement associated with meeting objectively assessed needs (OAN). As part of this process Arun District Council is providing careful consideration of the potential to contribute towards the unmet housing needs within the wider Housing Market Area over the plan period 2011-2031. Work is being undertaken by Arun to consider functional linkages between potential strategic housing sites in the District and surrounding local planning authority areas, including Adur and Worthing. This includes investigation of commuting and travel to work patterns.

1.3.3 However, Arun's ability to contribute significantly to the unmet needs of the wider Housing Market Area is likely to be limited. The Council is itself currently seeking assistance to meet the shortfall in housing provision identified within the Arun Local Plan in the early years of the plan period. A shortfall in housing provision in the early years of the Arun Local Plan is likely to occur as a result of the significant increase in OAN, recent under-delivery against annual targets (based on the OAN) since the start of the plan period in 2011, and the fact that the Arun Local Plan will be reliant on the inclusion of several large strategic greenfield sites to meet OAN. These sites by their very nature will inevitably be subject to relatively long lead-in times, and the phasing of the delivery of several strategic sites is likely to be subject to a degree of delay as a result of constraints in the local infrastructure network, particularly in terms of the capacity of local wastewater treatment plants. The ability of Arun District Council to contribute significantly to unmet needs over the plan period is further restricted by a recent increase in OAN (for both Adur and Arun) following the release of the 2014 based population and household projections.

1.3.4 With regards to employment, further work is being commissioned (by Arun) which will help to identify linkages between Arun and neighbouring areas, and examine whether Arun may be able to accommodate a proportion of unmet employment needs for certain uses over the plan period. Arun will share the findings of the work with neighbouring authorities once it is completed to discuss. It may be the case that there is limited capacity (approx. 80dpa) for Arun to address housing shortfalls in the sub-region, but this is yet to be determined.

#### Mid-Sussex District Council

1.3.5 At the time of writing, the Mid-Sussex Local Plan is currently being examined. Of the 13,600 homes that are planned over the plan period, Mid-Sussex District Council (MSDC) is proposing to deliver 782 dwellings (46 dpa) to assist with the unmet needs of neighbouring authorities. MSDC's Housing Matters Statement makes clear that it forms part of the North West

Sussex Housing Market Area (NWS HMA) as its primary HMA and is also a functionally linked neighbour of the Coastal West Sussex Housing Market. In particular, it is in dialogue with Brighton and Hove City Council (BHCC) and Crawley Borough Council regarding their unmet housing needs. However MSDC explain that they cannot be responsible for resolving all unmet needs in the housing market areas.

1.3.6 Work undertaken by Mid-Sussex indicates that its strongest linkages are with Brighton and Hove and Crawley, based on migration, commuting and the level of unmet need arising from these areas. Linkages with other authorities, particularly along the coast are weaker, and making provision to meet their unmet needs would not be considered sustainable development. This position is accepted by Adur District Council, as indicated in the Memorandum of Understanding signed in January 2016 which is included in Appendix 4 of the Adur DTC Statement (CD07/18). (A previous MOU between Adur, Worthing and Mid-Sussex District Council was signed October 2014). Mid-Sussex District Council is also committed to exploring these issues further through its membership of Coastal West Sussex and Greater Brighton Economic Board and the Coastal West Sussex and Greater Brighton (CWS&GB) Strategic Planning Board (SPB).

1.3.7 More strategically, as referred to above the CWSGB Strategic Planning Board (SPB) has resolved to support the principle of preparing a Local Strategic Statement 3. Work is being commissioned to undertake a detailed review of the Housing Market Areas (HMAs) and Functional Economic Market Areas (FEMAs) operating within and across the Strategic Planning Board authorities in order to clearly define the boundaries of the area that should be covered by the LSS update. The study will also provide the authorities with a sound basis for undertaking future housing and economic need assessments. (Final report due to be reported to SPB in February 2016). LSS3 will provide a mechanism to determine an appropriate spatial strategy for addressing housing distribution at the sub-regional level. The timing of this work will also allow any relevant guidance from the anticipated Housing White Paper to be taken into account.

**1.4 Is the ALP based on a sound process of sustainability appraisal and testing of reasonable alternatives, and does it represent the most appropriate strategy in the circumstances? Has the strategic site selection process been objective and based on appropriate criteria? Is there clear evidence demonstrating how and why the preferred strategy was selected?**

1.4.1 A Sustainability Appraisal (SA) (CD06/11) has been undertaken in support of the emerging Adur Local Plan in line with the procedures prescribed by

the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive. In line with the Regulations, the SA report answers the following four questions:

1. What is the scope of the SA?
2. What has Plan-making / SA involved up to this point?
  - There must have been at least one earlier plan-making / SA iteration. 'Reasonable alternatives' must have been appraised.
3. What are the appraisal findings at this current stage?
4. What happens next?

1.4.2 Appendix III of the SA is comprised of an assessment of 19 different site options. These sites were identified through the Strategic Housing Land Availability Assessment (SHLAA) and the Adur Urban Fringe Study (2006) (CD14/1). Additionally, a number of site options were identified through the Local Plan process including the western arm of Shoreham Harbour, the Shoreham Gateway site and the Police Station site in Shoreham. Each of the sites were assessed against the same relevant sustainability criteria in order to ensure consistency and a recommendation was made as to whether the site should be included in the Local Plan based on the site's performance against the sustainability criteria. The recommendation makes clear what the main issues are for each site and where there are issues that are likely to be insurmountable based on current evidence.

1.4.3 In addition to the assessment of site options, a number of 'reasonable alternatives' were also assessed and this is documented in detail in Part 2 of the SA. These include the following:

- Spatial strategy alternatives - this includes alternative approaches to addressing the question *'How much housing growth should be accommodated in Adur and where should it be directed to?'*
- Shoreham Airport development - what should be the broad strategy?
- Development of a new roundabout on the A27 - where should it be located?

1.4.4 Additionally, a number of changes to the New Monks Farm policy/site allocation proposed under a Regulation 18 Consultation (CD05/1) in December 2015 were assessed and compared against the New Monks Farm policy/site allocation as contained in the Proposed Submission Adur Local Plan 2014.

- 1.4.5 Finally, the Objectively Assessed Need for Housing (5,280 dwellings over the plan period) was assessed and compared against the housing target of 3,609 homes included in the Amendments to the Proposed Submission Adur Local Plan (2016) document.
- 1.4.6 The reasons for selecting the preferred approach for each of the alternatives are set out in Part 2 of the SA document. Further discussion of alternative sites not allocated for development within the Submission Adur Local Plan (CD07/1) can be found in the Council's response to Issue 18.
- 1.4.7 Boyer's representation (ID15) criticises the evidence on which the strategic site selection process has been based in terms of landscape and flood risk criteria. The evidence for landscape and visual sensitivity which has informed the Council's spatial planning policies is contained within the Assessment of Landscape Sensitivity for the Adur Local Plan Area (CD14/10) and the Adur Landscape Study Update (CD14/9). Additional assessment work has been undertaken to analyse the potential landscape and visual impacts of specific development proposals.
- 1.4.8 An earlier study (Landscape and Ecological Surveys of Key Sites within Adur District, 2012) (CD14/2) took a positive approach to testing the landscape and ecological impacts that could be expected to arise if development were to take place on six sites that had been put forward by developers. It should be noted that this work did not incorporate a formal assessment of the impact of development on the Local Green Gap and that, as the Council's policy approach has been developed, issues of coalescence and the contribution to the landscape settings of the settlements bordering the gaps have become more a significant consideration and this analysis has been developed in the 2016 Adur Landscape Study Update (CD14/9).
- 1.4.9 It should be noted that landscape was just one of the matters to be taken into consideration in determining the strategic allocations in the Submission Adur Local Plan (CD07/1). Of the six sites assessed in the 2012 study (CD14/2), four were allocated. Appendix III of the Sustainability Appraisal of the Adur Local Plan (C07/2) provides more information as to why certain sites were selected and why others were not.
- 1.4.10 Application of landscape evidence in the Local Green Gaps Topic Paper, 2016 (CD07/14). Referring to the Council's contention (in paragraph 6.5 of the Topic Paper) that, with the strategic allocations in place, the gaps would *still function as gaps and still provide the necessary separation to retain the separate identities of the relevant settlements within the Local Plan area*, Boyer's representation states (para 2.49) that *neither of the landscape*

*studies nor the Topic Paper itself describe, identify or quantify what the necessary separation required is in real or physical terms.*

1.4.11 This statement is misleading because the Adur Landscape Study Update (CD14/9) specifically addresses this issue. It describes the landscape setting of a settlement as *an integral component of its individual character and identity. It follows that the Local Green Gap is the area required to provide an effective landscape setting for the settlements on either side of the gap.*” Page 6 Adur Landscape Study Update 2016. (CD 14/9).

1.4.12 Part 5 of the Local Green Gaps Topic Paper (CD07/1) explains that the Local Green Gaps have been defined to ensure:

*“development that is otherwise appropriate in the countryside does not contribute to coalescence and therefore the character of Adur’s settlements is maintained. Development in these areas, even of uses appropriate to countryside locations could (individually or cumulatively) contribute to the coalescence of Adur’s settlements, leading to loss of character and individual identity, and resulting in uninterrupted development of the coastal strip from Brighton to Worthing”*

1.4.13 The Adur Landscape Study Update (CD14/9) analyses and defines the broad landscape settings of the settlements which border the gaps based on the zones of visual influence of accessible local views and the character of the ‘landscape edges’ which structure the way we perceive the landscape in views from the principal gateway approaches via roads and the railway and from publicly accessible footpaths and viewpoints. The report acknowledges that the landscape setting of a settlement cannot easily be measured but, taking the analysis of the Lancing-Shoreham Gap as an example, Section 2 describes how the ‘landscape edges’ can be shown to define the broad landscape settings for Lancing and Shoreham-by-Sea (illustrated on Figure 8) and thus the minimum land-take that is required to retain their separate identities. As Figure 8 demonstrates, there is an extensive overlap between the landscape settings of Lancing and Shoreham in the centre of the Lancing-Shoreham Gap; it is this central area, where the landscape settings overlap, that is considered critically important to provide the ‘necessary separation’ required to retain and protect the separate identities of these two settlements. Section 2.2 states:

*While the Lancing-Shoreham Gap clearly does provide a critically important visual break between these settlements, these views, and the continuous urban edge along the coast, suggest that the gap is already critically narrow. There is a risk that further development within the gap, in addition*

*to that allocated in the Proposed Submission Adur Local Plan, would contribute to the coalescence of Lancing and Shoreham-by-Sea.*

**1.5 Are all the components of the Council's spatial strategy (policy 2) justified and compatible with the principles referred to in paragraph 17 of the NPPF?**

1.5.1 Yes. Policy 2 of the Adur LP sets out the overall spatial strategy for the delivery of development in Adur over the Plan period. It guides development within, and adjacent to Adur's settlements, in order to manage the pattern of growth (11<sup>th</sup> principle). It describes how new development will be distributed in Adur. Realistic options for locating development are extremely limited due to the compact size of the local plan area and its constrained location between the South Downs National Park and the sea. There are few real choices in terms of different locations or strategies if the Plan is to go as far as it can to balance meeting objectively assessed needs for development, whilst seeking to safeguard countryside, and avoid coalescence.

1.5.2 The fifth principle of paragraph 17 refers to the different roles and character of different areas, as well as promoting the vitality of main urban areas, and recognising the intrinsic character of the countryside. Policy 2 is compatible with this, in that it seeks to direct development within the Built Up Area Boundary (BUAB) and carefully manage development within the countryside to ensure the character and loss of identity of Adur's settlements is avoided. Similarly Policy 2 is compatible with the ninth principle; the countryside has value in terms of character and landscape, and the local gap areas act to avoid coalescence of settlements, whilst these areas also have secondary benefits for biodiversity and flood risk mitigation.

1.5.3 Policy 2 is also compatible with the 8th principle, which seeks to encourage the reuse of previously developed land, and 11, which seeks to actively manage patterns of growth to maximise opportunities for non-motorised transport. These are both compatible with the overall policy approach of Policy 2.

1.5.4 The policy reference to the regeneration of Shoreham Harbour is compatible with the eighth and ninth principles, in that the Local Plan encourages mixed use development in this area of brownfield land. The third principle (to proactively drive and support sustainable economic development) is also supportive of the allocations at Shoreham Airport and Shoreham Harbour in Policy 2.

1.5.5 The final paragraph of Policy 2, which relates to Sompting village (outside of the BUAB), (much of which is within the Sompting Conservation Area) is considered to be compliant with paragraph 10, in relation to the conservation of heritage assets.

1.5.6 It could be argued that by not including other greenfield allocations (and not delivering Adur's full OAN for housing) the policy is non-compliant with paragraph 17 of the NPPF. However it is considered that Policy 2 (and indeed, the Local Plan as a whole) does in fact 'set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities'. It is not considered that any land other than that set out in Policy 2 is 'suitable for development' – therefore all suitable land has indeed been allocated. The needs of the residential and business community are not only for more housing and business floorspace, but also for infrastructure, a high-quality environment and transport network. To meet all housing needs would erode the character of the area and lead to over-development. Allocation of other greenfield sites may also fail to comply with principles 5 and 9. Similarly paragraph 152 states that LPAs should seek opportunities to achieve *each* of the economic, social and environmental dimensions of sustainable development; the Council considers that the Submission Adur Local Plan does so.

**1.5 (a) Will the policies and proposals in the ALP contribute to the sustainable growth of the District?**

1.5.7 Yes. It is appreciated that the allocations (and Shoreham Harbour broad location) referred to in Policy 2 will not completely meet Adur's objectively assessed needs (OAN) for housing and employment. However, the definition of sustainable development within the NPPF refers to the three strands of social, environmental and economic aims (with no prioritisation of any one of these). It is considered that to attempt to meet all needs within the Adur Local Plan area would lead to overdevelopment, coalescence and loss of character of settlement, and irreversible loss of countryside. Instead the plan seeks to achieve a balance between meeting needs and safeguarding the limited countryside assets which form the setting of Adur's settlements.

1.5.8 The Local Plan has been informed by a Sustainability Appraisal (SA) (CD07/2) which has ensured that it strikes a balance between environmental, social and economic objectives. The SA also specifically assessed the Objectively Assessed Housing Need (5,820 dwellings over the plan period) against the housing provision figure in the Adur Local Plan

(3,609 dwellings over the plan period). The conclusion of the SA is as follows (see para 13.3 of the SA):

*'While it is recognised that Option 2 (5,820 dwellings) would have significant social and economic benefits, it would also have significant negative impacts on the environment. These include a significant reduction in the local green gaps to the point where their function is compromised, and more development in areas at risk of flooding (New Monks Farm). Option 1 (3,609 dwellings) aims to strike a greater balance between social, economic and environmental objectives and deliver housing without eroding the character of Adur and maintaining the principle and purpose of the Local Green Gaps. Option 1 has been informed by the SA process and more clearly aims to fulfil the vision and objectives set out in the Plan.'*

**1.6 Is the relationship between the ALP and any future Neighbourhood Plans sufficiently clear? Do the policies of the ALP provide sufficient and appropriate 'hooks' on which to 'hang' neighbourhood plans?**

1.6.1 Policy 1 of the Submission Adur Local Plan 2016 (SALP 2016) refers to neighbourhood plans, and states:

*'Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in Neighbourhood Plans) will be approved without delay, unless material considerations indicate otherwise.'*

1.6.2 At the time of writing, there are two Neighbourhood Plans being prepared in Adur:

- Sompting Neighbourhood Plan (Area designated December 2012). This work is being led by the Parish Council. Paragraph 2.72 of the SALP2016 refers to the Sompting Neighbourhood Plan, and makes clear that there is potential for this to address aspects of the West Sompting allocation.
- Shoreham Beach Neighbourhood Plan (Plan area and Forum designated November 2014). Paragraph 3.28A of the SALP2016 refers to the approval of the SB Neighbourhood Area, and designation of the forum.

1.6.3 It is acknowledged that the Plan makes no specific reference to the fact that further Neighbourhood Plans may come forward in the future. However, it is not considered that it is necessary to have a specific policy reference to neighbourhood plans for the following reasons:

- 1) There is substantial legislative basis and national policy guidance for Neighbourhood Plans. It is not considered necessary to repeat this within the Adur Local Plan.
  - 2) Furthermore, it is not considered necessary to make a general statement within a Local Plan policy stating that the Council will 'support the development of Neighbourhood Plans' or similar. Given the legal requirements and duties relating to Neighbourhood Plans, it seems unnecessary; such a statement would constitute a statement of procedure and have little value as a policy.
  - 3) It is perhaps important to note that in contrast with some other planning authorities, the Adur Local Plan is not reliant on neighbourhood plans to deliver any of its proposed housing. As a result, no reference to neighbourhood plans is included within Policy 3: Housing. The emerging Sompting Neighbourhood Plan seeks to influence elements of the Submission Adur Local Plan's West Sompting allocation (Policy 6); however it does not seek to deliver any additional housing allocations over and above what is already set out in the ALP. The Shoreham Beach Neighbourhood Plan is at an early stage in its preparation. However emerging issues include sustainable transport and parking, design, education and potential for limited residential development within the existing Built Up Area Boundary.
- 16.4. Should any additional neighbourhood plan(s) come forward during the plan period, given the limited capacity for development in Adur, and the need to comply with the strategic policies of the Local Plan (including the spatial strategy, countryside and Local Green Gap policies) it appears unlikely that any significant allocations would come forward.
- 1.6.5 A note entitled 'Support for Neighbourhood Plans' (CD24/8) is available on the Adur and Worthing Councils website. This outlines statutory duties and abilities as well as the support available from Adur and Worthing Councils to Parishes and Forums undertaking Neighbourhood Plans. It is not considered necessary to replicate this information within the Plan or its supporting text.
- 1.6.6 It is noted that Turley Associates (representation ref 26 and 62) state that paragraph 2.72 of the Adur Local Plan is over-specific. However, it should be emphasised that this only indicates potential areas of joint working between the Sompting NP and developer, and is not a requirement of Policy 6: West Sompting.