

Amendments to the Proposed Submission Adur Local Plan (2016)

Report by Director for Economy

1.0 Summary

- 1.1 This report presents the Amendments to the Proposed Submission Adur Local Plan (2016). It is proposed that the Plan is formally published for representations for a period of six weeks (together with the accompanying Schedule of Changes, Policies Map and Sustainability Appraisal); and that following this publication period, the Plan (together representations and accompanying documents) is submitted to the Secretary of State. The Amendments to the Proposed Submission Adur Local Plan (2016) document is attached as Appendix 2.

2.0 Background

- 2.1 Members will recall that on 9th October 2014 the Proposed Submission Adur Local Plan 2014 (PSALP 2014) was agreed by Full Council for formal publication under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This represented the latest stage in the Plan's development, and was based on a range of technical evidence (available on the Councils' website) and feedback from a range of consultation exercises (Statement of Consultation refers). The 2014 Plan was also informed by a Sustainability Appraisal which considered the likely significant effects of the Plan, and reasonable alternatives. This included assessment of a range of potential greenfield and brownfield sites.
- 2.2 The Plan contained a range of policies and proposals which together formed a strategy to deliver 3,488-3,638 homes and 41,000 sqm of employment-generating floorspace to facilitate regeneration, guide investment and infrastructure delivery, and to meet identified needs as far as possible. The plan seeks to allocate strategic allocations at West Sompting, New Monks Farm and Shoreham Airport. The Plan also forms part of the policy basis for the Shoreham Harbour regeneration project and emerging Joint Area Action Plan.
- 2.3 The Plan was formally published between 20th October – 1st December 2014 at which point representations could be made in relation to the 'Tests of Soundness' and legal compliance. (The 'tests of soundness' set out in the NPPF require that plans are prepared positively, are justified, effective, and consistent with national policy). Representations from 42 individuals and organisations were received and have been published on the Councils' website.

- 2.4 It had been anticipated that the Local Plan would then be submitted to the Secretary of State in March 2015 following the publication stage and assessment of the representations received. However, some proposed changes relating to one of the strategic allocations in the Plan, New Monks Farm, were raised in representations. Following this, amended proposals for the site were submitted to the Council for consideration.
- 2.5 Following consideration of these proposals, an additional consultation exercise (carried out under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012) was undertaken between 9th December 2015 and midnight 4th January 2016, specifically relating to proposed amendments to the strategic allocation at New Monks Farm. Changes to the strategic allocation (as well as amendments in relation to other matters) have been included within a revised version of the Local Plan, called 'Amendments to the Proposed Adur Local Plan (2016)'. It is proposed that this document is formally published under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 to allow for representations to be made as to whether the amendments meet the 'Tests of Soundness' and/or are legally compliant.
- 2.6 Preparation of a Local Plan is a statutory requirement. The NPPF states that the Local Plan is the starting point for decision making; proposed development that accords with an up-to-date Local Plan should be approved, and proposed development that conflicts should be refused unless material considerations indicate otherwise. The Government is keen that Local Planning Authorities have an up-to-date plan in place. Where there is no up-to-date plan, there is less ability to positively influence development which could come forward on an ad hoc basis.

3.0 Amendments to the Proposed Submission Adur Local Plan - Changes made

- 3.1 As set out above, a number of amendments to the Adur Local Plan are currently proposed. These reflect changes made to the proposed strategic allocation; changes made in response to issues raised in some representations to the PSALP 2014; changes made to reflect new evidence; changes in Government policy since publication of the PSALP 2014, and corrections and editorial amendments.
- 3.2 In addition a range of updated evidence has been produced since the publication of the PSALP 2014. These include: an updated transport assessment; an update of Objectively Assessed Housing Needs work (see paragraph 3.7 below); updated landscape work, a heritage assessment of Shoreham Airport, and viability work. (These will all be made available on the Council's website for the publication process). Relevant changes have been proposed to the Plan, where appropriate.
- 3.3 The Amendments (attached as Appendix 2) are clearly indicated for ease of understanding through the use of bold and underlined text (additions) and 'strikethrough' text for deletions. In addition, a separate Schedule of Changes has been produced to explain why each change has been made. Some key changes are highlighted below. *(Please note that this report does not address all changes).*

Part One - The Adur Local Plan

- 3.4 This sets out the Vision and Objectives of the Plan (developed from work with stakeholders early in the plan process) which will be delivered through the policies in the Plan. Part One also contains a model policy on Sustainable Development, which reflects the presumption in favour of sustainable development found in the NPPF. Amendments in this section comprise an update on the progression of the plan, the Local Strategic Statement, proposals of Highways England, the Shoreham Adur Tidal Walls, and references to evidence.

Part Two – A Strategy for Change and Prosperity

- 3.5 This sets out the strategy of the Plan to facilitate the regeneration of Adur, and how the Plan seeks to work towards meeting Adur's objectively-assessed requirements for housing and employment land, *but makes clear that due to constraints, it is not possible to meet these needs in full*. It proposes allocations at West Sompting (residential and open space); New Monks Farm (residential, employment-generating uses, community facilities etc) and Shoreham Airport (employment generating uses) taking into account environmental assets and constraints. It also provides a 'broad location' policy for Shoreham Harbour (that part which lies within Adur) and forms the 'policy hook' for the Joint Area Action Plan being prepared. Key amendments proposed to these policies are as follows:

Objectively Assessed Needs and Housing Delivery Figures.

- 3.6 Members will recall that the PSALP 2014 used the Assessment of Housing Development Needs Study 2014 as a basis for determining the housing requirement – given as 180-240 dwellings per annum, or 3,600-4,800 over the plan period). This study has since been updated by the Objectively Assessed Needs for Housing; Adur District Report (2015) which uses an updated set of demographic projections, taking account of the 2012-based sub-national population projections published in March 2014 and the 2012 based household projections published in February 2015. The updated study recommends the delivery of 291 dwellings per annum, or 5,820 dwellings over the plan period. (These figures represent demand for new homes). The figure includes uplifts to address housing market signals, affordability, and economic growth.
- 3.7 In addition, the opportunity has been taken to update the housing delivery target (which covers the plan period from 2011 -2031). As the report accompanying the PSALP 2014 explained, all sources of housing land have been considered, including brownfield sites (which are monitored through the Strategic Housing Land Availability Assessment). Figures in Table 1 (below) have been updated to reflect changes since the publication of the previous version of the Local Plan.

	Number of dwellings
Sources of Housing Supply	
Dwellings completed 2011-2015	528
Existing commitments (large and small sites where planning permission has been granted)	326
Sites identified in the SHLAA 2015	291
Windfall allowance	416
Sites to be identified in Local Plan:	
Shoreham Harbour Broad Location	968
New Monks Farm Strategic Allocation	600
West Sompting Strategic Allocation	480
Total Housing Supply (Delivery Target) 2011-2031	3609 (annual target 180)

- 3.8 The updated table clearly indicates that the amount of residential development that can be delivered (3,609 dwellings over the plan period - an annual delivery target of 180) when measured against Adur's Objectively Assessed Needs still results in a shortfall; this shortfall figure has been updated to 2,211 dwellings.
- 3.9 Policy 3, which relates to housing provision, has been updated to reflect these revised figures, and to reflect the amendment made in relation to New Monks Farm (see below).

Strategic Allocations.

- 3.10 As referred to above, amendments are proposed to the strategic allocation at New Monks Farm as follows:
- 1) The number of dwellings is now given as 600 (rather than an indicative range of 450-600 as previously stated).
 - 2) The indicative location of the proposed roundabout is moved eastwards to a more central location between Shoreham (Brighton City) Airport and the New Monks Farm allocation.
 - 3) The existing Withy Patch travellers' site is to be relocated to allow for the revised roundabout location. Relocation also provides an opportunity to improve the site and facilities, address flood risk and in due course enable some limited future expansion to meet identified needs from within Withy Patch.
 - 4) The site allocation boundary is amended, to include the existing Withy Patch site. Including this area within the site boundary will mean that the relocated site and flood risk improvements will be delivered as part of the development at New Monks Farm. (It was not necessary to include it previously, as it was not affected by the proposals set out in the PSALP 2014).

5) The proposed Built Up Area Boundary (between the proposed built up area of New Monks Farm, and the proposed country park) is shown as indicative; the final boundary will be determined at planning application stage based on landscape and drainage assessments.

- 3.11 These amendments have been incorporated into Policy 5, and the supporting text. In addition the opportunity has been taken to make clear that a maximum of 250 dwellings can be constructed prior to the roundabout becoming operational; greater detail on wastewater is given in the supporting text; and explanation is given regarding the relocation of the existing Withy Patch travellers site, which will be required due to the revised location of the proposed roundabout. Relocation will provide an opportunity to provide a limited extension in due course (to meet identified needs) through an extension, although this can only take place once it is confirmed that the relocated pitches are taken out of flood zone 3. In addition Policy 5 has been amended to make clear that the Flood Risk Assessment which will need to accompany any planning application must take account of, and seek to facilitate the relevant recommendations of the Surface Water Management Plan for the Lancing area.
- 3.12 Policy 6 relates to the allocation of land for 480 dwellings at West Sompting. Minor amendments have been made, including those to clarify that two youth football pitches will be required as part of the development, and a financial contribution towards the provision of education facilities will be required.
- 3.13 Policy 7 relates to Shoreham Airport. Amendments have been made to the supporting text to clarify that the preferred location for the proposed roundabout is centrally located between New Monks Farm and the Airport. (The PSALP 2014 proposed a proposed roundabout to the west at New Monks Farm, and retained the option of a roundabout at Sussex Pad as a contingency). As with Policy 5, an amendment to the policy is proposed which clarifies that a Flood Risk Assessment required at planning application stage must take account of and seek to facilitate relevant recommendations of the Surface Water Management Plan for the Lancing area. Additional policy wording has also been proposed, which seeks to ensure that any new development at the airport must not jeopardise the runway use and airport operations. Also, that within the existing developed area at the southern end of the Airport, airside aviation-related B1, B2 and B8/hangar uses will be protected; aviation and non-aviation related B1, B2 and B8 hangar uses will be supported for non-airside development.
- 3.14 A number of amendments have been made to Policy 8: Shoreham Harbour Regeneration Area. The main addition is reference to the potential heat network identified in the Shoreham Harbour Heat Network Study (2016), and the requirement for new development to connect where a system is in place or to be compatible with future connection to a network. Character area priorities have also been updated to reflect the emerging Joint Area Action Plan. This includes the designation of strategic sites at Southwick Waterfront and the Western Harbour Arm. Changes include specifying acceptable land uses and additional detail on infrastructure requirements, including transport improvements and green infrastructure.

Part Three – Policies for Places

- 3.15 These are area-based policies for Lancing, Sompting, Shoreham-by-Sea, Southwick and Fishersgate, Adur's countryside and coast (outside of the National Park) and Local Green Gaps, which relate to place-specific issues and proposals. An amendment has been made to reflect the creation of the Shoreham Beach Neighbourhood Forum, which is working with the community to prepare a Neighbourhood Plan for the area. In addition, text has been added to make clear that the Council is working with West Sussex County Council to address the need for suitable education provision in the Shoreham area, arising from growth. The amendment states that existing primary schools are nearing capacity with planned improvements, and opportunities for expansion are limited. Work is being undertaken to ensure any feasible opportunities to increase capacity at existing schools in the area can be brought forward in the plan period or if other sites can be identified. If not, innovative solutions to address need will be considered by all authorities.
- 3.16 Amendments have also been made to reflect the adoption of a development brief for the Former Eastbrook Allotments site (November 2015).

Part Four - Development Management Policies

- 3.17 These are detailed policies on particular topics, including conservation areas and listed buildings, open space provision, affordable housing and sustainable development, which will be used in assessing planning applications for development (in conjunction with others in the Plan as appropriate). The report accompanying the Proposed Submission Adur Local Plan 2014 stated that some policies might require amendment or deletion due to anticipated Government changes. These changes have been reflected in some of the amendments made, particularly in relation to policies relating to sustainability. Policy 18 relating to the energy hierarchy has been deleted. References and requirements for new homes (and conversions to new homes) to comply with the Code for Sustainable Homes have been removed following the Government's Housing Standards Review, which confirmed that energy efficiency in new homes (and some other matters) will be dealt with through Building Regulations. Policy 19 (which relates to Sustainable Design) now includes the Government's higher water efficiency standard of no more than 110 litres/person/day (lpd); this optional standard can only be applied in areas with specific local needs, such as water stress. It is considered that the use of this standard is justified given that Adur lies within an area of serious water stress.
- 3.18 In addition, a requirement has been added to Policy 20 (Decentralised Energy, Stand-alone Energy and Renewable Energy) which states that where viable and feasible, commercial and residential developments in areas identified in the Shoreham Harbour Heat Network Study (2016) will be expected to connect to district heating networks where they exist; and that all new major development will be expected to incorporate renewable/ low carbon energy production equipment to provide at least 10% of predicted energy requirements. This latter addition aims to ensure that new development minimises its carbon emissions having regard to the Government's decision to withdraw the Code for Sustainable Homes as well as their decision not to proceed with ensuring all residential development is constructed to zero-carbon standard by 2016 (via Part L of the Building Regulations).

- 3.19 With regards to housing policies, supporting text of Policy 21 Housing Mix and Quality has been updated to reflect that future market housing delivery should reflect the following mix:
1 bed properties – 10%
2 bed properties – 45%
3 bed properties – 35%
4 bed properties – 10%
which reflects the findings of the Objectively Assessed Need for Housing report (2015). This mix will be the starting point for negotiations.
- 3.20 In addition, the OAN report states that the population of Adur is ageing with the 75+ age group showing the greatest proportional increase over the plan period. Given that the number of elderly households (and other sectors of the community) are likely to have a need for homes designed to meet their changing needs, and to enable them to live independently for longer, additional text has been added to make clear that the Council will therefore encourage all new homes to be built to the higher optional Building Regulation standard M4(2) Accessible and Adaptable Dwellings where possible, and will apply it as a planning condition to development where viability is not compromised.
- 3.21 In order to ensure that sufficient internal space in new homes should be provided, Policy 21 has been amended to ensure that the Government's recent national minimum space standards (Technical Housing Standards March 2015) will be applied to new dwellings. As a result, Adur's own internal space standards will no longer be used other than for conversions to residential use, which are not addressed by the Government's standards. In order to clarify this matter, Policy 21 retains a reference to use of the Development Control Standard note on flat conversions, as these are not addressed by the national standards. Similarly Policy 23 now provides clarity around external space.
- 3.22 With regards to affordable housing, Members will be aware that the Government is progressing legislation (Housing and Planning Bill) which will, if enacted, contain duties for local authorities in relation to Starter Homes. However at this point in time these requirements are not fully clarified; as a result amendments have not been made to the plan with regards to Starter Homes. In due course, if the legislation is enacted prior to submission of the Plan, further amendments to the Plan will be proposed and submitted alongside the Plan for consideration by the Inspector. These will be necessary to ensure the Plan is consistent with national policy. As a result, at this point in time only minor amendments have been made to Policy 22 Affordable Housing, to indicate the preferred tenure mix of affordable housing sought (reflecting updated evidence). The supporting text has also been amended to reflect the mix of affordable housing recommended by the Objectively Assessed Housing Needs for Adur report (2015) as follows:
1 bed dwellings – 20-25%
2 bed dwellings - 30-35%
3 bed dwellings - 30-35%
4 bed dwellings - 10-15%
- 3.23 Supporting text to Policy 24, Provision for Gypsies, Travellers and Travelling Showpeople has been updated to reflect the proposed changes in relation to the

New Monks Farm strategic allocation (including revised roundabout location) referred to above.

- 3.24 Policy 26 Protecting and Enhancing Existing Employment Sites and Premises has been revised to provide more clarity and allow for more flexibility for appropriate non B-class employment generating uses.

Part 5 - Appendices

- 3.25 This section contains additional information on matters including monitoring and delivery, and a schedule of changes to the Policies Map. Additional amendments to the Policies Map are proposed as follows:
- Amendment to reflect the revised boundary of the New Monks Farm strategic allocation, to incorporate the revised roundabout location and current location of Withy Patch travellers site;
 - Symbol relocated to reflect revised indicative location of the proposed roundabout;
 - The Built Up area Boundary at New Monks Farm between the proposed housing area and country park is now shown as indicative (final boundary to be determined through the planning application process, based on detailed landscape and drainage evidence).
 - All scheduled monuments have been added to the Proposals Map
 - An amendment to the countryside, Local Green Gap and Built Up Area Boundaries has been made to account for the new Adur Ferry Bridge.

Other Documents

- 3.26 Work has been undertaken (and will continue) with infrastructure providers, developers and promoters of the strategic allocations to ensure that appropriate and adequate infrastructure will be delivered at the appropriate time to deliver the policies in the Plan. An updated Infrastructure Delivery Plan has been prepared and will be made available alongside the Amendments to the Proposed Submission Adur Local Plan (2016). It will set out what infrastructure is required; which body/agency will deliver it; how it will be funded, and when it will be delivered.
- 3.27 A range of technical evidence has contributed to the development of this Local Plan. All studies which have contributed to the evolution of the Plan will be made available on the Councils' website. Since the publication of the Proposed Submission Adur Local Plan 2014, a number of studies have also been updated. These include: updated transport work (Adur Local Plan Second Addendum Transport Study 2016), Assessment of Objectively Assessed Housing Needs Study: Adur District (2015); Adur Landscape Study Update (2016); Shoreham Airport Heritage Assessment (2016); Adur Whole Plan viability, Community Infrastructure Levy and Strategic Sites Viability Assessment (2016); and Shoreham Harbour District Heating Study. The Sustainability Appraisal accompanying the Plan has also been updated, and will be made available with the other Local Plan documents.
- 3.28 In addition, an updated Duty to Co-operate Statement will also be published. This details the actions that have been undertaken to address the Duty to Co-operate

(introduced by the Localism Act 2011). Adur Planning Officers are in discussion with neighbouring authorities, with particular regard to housing provision and employment land. It will be important to demonstrate how the outcomes of these discussions have influenced the preparation of the Adur Local Plan; this aspect will be considered at the forthcoming Examination of the Local Plan, particularly given the shortfall in meeting Adur's housing needs. The Duty to Co-operate statement will also reflect the fact that the Local Strategic Statement (LSS) for Coastal West Sussex (CWS) and Greater Brighton and Hove has recently been updated. This document provides a mechanism for contributing to and coordinating work on strategic planning and economic activity in the wider area. It also demonstrates that strategic co-operation has been an integral part of plan-making across CWS and that this is being managed on an on-going basis. The LSS includes key objectives and development priorities for the coastal area, including Shoreham Harbour and Shoreham Airport.

4.0 Next Steps

- 4.1 Following consideration of this report by the Planning Committee and Adur Executive, any agreed comments will be forwarded to Full Council, together with a recommendation that Full Council agrees the publication and submission of the Plan to the Secretary of State for examination.
- 4.2 Subject to the approval of Full Council, Amendments to the Proposed Submission Adur Local Plan (2016) will be published in order that representations may be made from 31st March – midnight 11th May 2016. The Plan, Schedule of Changes, Policies Map, and Sustainability Appraisal will be available on the Council's website (Adur Planning Policy pages) and on deposit at the Shoreham Centre (Pond Road), Lancing Library, Shoreham-by-Sea Library, and Southwick Library. Copies of the Plan and supporting documents will also be made available at Lancing Parish Council offices and Sompting Parish Council (Harriet Johnson Centre).
- 4.3 The Plan will also be accompanied by updated versions of the Infrastructure Delivery Plan, Background Evidence Document, Duty to Co-operate Statement, Sequential and Exceptions Test, an Equalities and Health Impact Assessment, Habitat Regulations screening opinion, and other supporting documents. All relevant documents, as well as representation forms and a guidance note (explaining the process, how to respond, and next steps) will be made available on the website, and at those places where the Plan is available. The evidence studies which have informed the plan will be available on the Council's website.
- 4.4 Representations made during the publication period, and the Council's accompanying submission documents, as well as representations received in response to the publication of the Proposed Submission Adur Local Plan 2014 will then be submitted for examination alongside the Plan itself. It is anticipated that this submission will occur in late July 2016. Following this an Inspector will be appointed, and examination of the Plan will commence. The public hearing is anticipated to start in October 2016, although this timetable is dependent on the Planning Inspectorate.

5.0 Legal

- 5.1 The Amendments to the Proposed Submission Adur Local Plan (2016) have been prepared in accordance with the Planning and Compulsory Purchase Act 2004, the Town and Country Planning (Local Planning) (England) Regulations 2012, the Localism Act 2011, and the National Planning Policy Framework (NPPF) 2012.

6.0 Financial implications

- 6.1 The production of the Adur Local Plan and associated publication is to be funded by the existing Planning Policy budget.

7.0 Recommendations

To the Planning Committee

Planning Committee is recommended to:

- 7.1) Consider the officer's report, the Amendments to the Proposed Submission Adur Local Plan (2016), Sustainability Appraisal and Sequential and Exceptions Test, and decide what comments, if any, it wishes to submit to Adur Executive sitting on 10th March 2016 and Full Council considering the matter on 21st March 2016.

To the Executive:

The Executive is recommended to:

- 7.2) Consider the comments, if any, made by Adur Planning Committee sitting on 8th March 2016.
- 7.3) Consider the officer's report, the Amendments to the Proposed Submission Adur Local Plan (2016), Sustainability Appraisal and Sequential and Exceptions Test, and decide what comments, if any, it wishes to submit to Full Council.
- 7.4) Recommend to Full Council that:
1. Council agree that the Amendments to the Proposed Submission Adur Local Plan (2016) is published for a six-week period of representation from 31st March – midnight 11th May 2016 under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, and that accompanying documents including the Sustainability Appraisal and Sequential and Exceptions Test are also made available.
 2. Council delegate authority to the Head of Economic Growth to further amend the Amendments to the Proposed Submission Adur Local Plan (2016) prior to publication, and also the Sustainability Appraisal and

Sequential and Exceptions Test, where amendment is required to correct minor errors and for purposes of clarification only.

3. Council delegate to the Head of Economic Growth in consultation with the Executive Member for Regeneration and Chairman of Adur Planning Committee, to agree for publication those documents accompanying the Amendments to the Proposed Submission Adur Local Plan (2016).
4. Council agree that following the six-week publication period for representations, the Amendments to the Proposed Submission Adur Local Plan (2016) be submitted to the Secretary for State for examination, together with the Proposed Submission Adur Local Plan 2014, accompanying documents, any representations received during both publication periods of the Proposed Submission Adur Local Plan 2014 and the Amendments to the Proposed Submission Adur Local Plan (2016), and any updates to the evidence base as may be necessary.

Local Government Act 1972

Background Papers:

Localism Act 2011

National Planning Policy Framework (NPPF) 2012

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1.0 Council Priority

- 1.1 The Adur Local Plan will help to
- Support major regeneration projects to tackle deprivation;
 - Support businesses in creating jobs and regenerating neighbourhoods;
 - Seek to meet the housing needs of our communities;
 - Seek to safeguard Adur's environmental assets.

2.0 Specific Action Plans

- 2.1 Through specific policies, to improve the visual appearance of Adur; to work towards the provision of sufficient housing and employment; to promote regeneration including Shoreham Harbour and Shoreham Airport, and to promote the viability and sustainability of town centres.

3.0 Sustainability Issues

- 3.1 The Government requires that the all Development Plan Documents be subject to a formal Sustainability Appraisal, an updated version of which will be published alongside the Amendments to the Proposed Submission Adur Local Plan (2016).

4.0 Equality Issues

- 4.1 The Local Plan aims to ensure that all groups in Adur have equal access to the spatial opportunities offered by the new development plan. For example affordable housing and public transport are key issues being addressed through the new plan to promote equal opportunities. An updated Equalities and Health Impact Assessment report will accompany the Amendments to the Proposed Submission Adur Local Plan (2016).

5.0 Community Safety issues (Section 17)

- 5.1 No negative issues have been identified.

6.0 Human Rights Issues

- 6.1 No negative issues have been identified.

7.0 Reputation

- 7.1 The Local Plan must be prepared in line with Government policy and legislation and is subject to extensive community involvement. The delivery of the policies and strategy will set a clear framework for development and the delivery of infrastructure, and seeks to meet Adur's needs, and therefore should have a positive impact on the reputation of the Council.

8.0 Consultations

- 8.1 This publication stage is a statutory requirement and integral to the development of this document. An additional consultation was carried out in under Regulation 18

of the Town and Country Planning (Local Planning) (England) Regulations 2012 in order to address proposed changes to the strategic allocation at New Monks Farm

9.0 Risk assessment

9.1 There is a statutory duty on the Council to produce a Local Plan. Failure to do so could impact on a number of this Council's priorities including economic and social regeneration as well as the delivery of affordable housing.

10.0 Health & Safety Issues

10.1 Matters considered and no issues identified.

11.0 Procurement Strategy

11.1 This report complies with the Procurement Strategy.

12.0 Partnership working

12.1 Other agencies, including infrastructure providers will be involved in delivering the policies of the Adur Local Plan. The Duty to Co-operate applies not only to local authorities, but other specific bodies identified by legislation. In addition, the Joint Area Action Plan for Shoreham Harbour is being developed jointly by Adur District Council, Brighton and Hove City Council, and West Sussex County Council.

Appendix 2: Amendments to the Proposed Submission Adur Local Plan (2016).