



Adur Core Strategy: Results of Housing and Employment Options, Next Steps, Proposed Consultation and Format of Development Plan

Report by the Executive Head of Planning, Regeneration and Wellbeing

1.0 Summary

- 1.1 This report presents the results of the recent Adur Core Strategy Housing and Employment Options consultation, and sets out next steps in the evolution of the development plan for Adur. It proposes further consultation on two alternative housing targets (and site options), a change from production of a Core Strategy to a Local Plan, and a revised timetable.

2.0 Background

- 2.1 Due to the Government's intended abolition of Regional Spatial Strategies, including the South East Plan, consultation was carried out regarding potential housing and employment targets to be incorporated into the emerging Adur Core Strategy. As explained in the Cabinet Member report of 14th June 2011, the Adur Core Strategy will address the planning policy framework for that part of Adur District which lies outside of the South Downs National Park.
- 2.2 The consultation on the housing and employment options ran from 27th June to 7th August 2011. (These options had been selected for consultation by Adur members at a seminar on 14th April 2011; information relating to capacity, housing demand and other issues were discussed). A consultation leaflet (containing a brief questionnaire), a background Options Technical document and a Sustainability Appraisal of the options were prepared. The documents were made available on the Council website, and at locations throughout the district. The opportunity was made for people to respond to the questionnaire online, or by returning a paper copy. The consultation was publicised by a variety of means, as set out in Appendix 1.

3.0 Proposal

3.1 Proposals – Results of consultation

- 3.1 In total 169 responses were received (155 on paper, 14 directly online). The following tables indicate the preferences indicated. More information on the results may be found in Appendix 1 of this report. Please also note that not everyone who responded selected a housing or employment option. Although some responses were received after the end of the advertised consultation period, these have been included in the total figures. As plan preparation is still at an 'informal' regulation 25

stage it is considered acceptable to do so. Summaries of responses and comments made are available in the Adur Members Room.

Question 1: Of the four housing options, which one do you think is the most appropriate housing target for Adur?

	Option 1 65 homes per year (1105 homes between 2011 and 2028)	Option 2 105 homes per year (1785 homes between 2011 and 2028)	Option 3 155 homes per year (2635 homes between 2011 and 2028)	Option 4 270 homes per year (4590 homes between 2011 and 2028)	No option selected	Total respondents
Questionnaire responses (paper and online)	47 (28%)	55 (33%)	25 (15%)	28 (17%)	14 (8%)	169
Viewpoint evening seminar	4	9	10	1		24
Sir Robert Woodard Academy (total)	7	28	8	1	-	44

Question 2: Which employment scenario do you think is the best for Adur?

	Option A – Baseline Scenario	Option B – Economic Intervention Scenario	No option selected	Total Responde nts
Questionnaire responses (paper and online)	67 (40%)	87 (51%)	15 (9%)	169
Viewpoint evening seminar	9	15		24
Sir Robert Woodard Academy (Total)	16	32	-	48

3.2 Comments made by Lancing and Sompting Parish Councils are summarised in Appendix 1.

3.3 In terms of general issues raised by consultees, the following issues were the most prevalent:

- The limited environmental capacity of the area to absorb new development.
- The strain new housing will put on social infrastructure in the district i.e. schools, medical services etc.
- New housing and employment exacerbating existing congestion problems on the A27 and A259.
- New development exacerbating existing parking problems in the district.

- Concerns regarding development in areas at risk of flooding.
 - The need for more affordable housing.
 - The need to bring empty properties back into use before new properties are built.
 - The impact on/loss of the character of the district.
- 3.4 A concern of some of the developers that responded to the consultation was that only one option (option 4) actually meets Adur's housing demand. The Home Builders Federation considered that the consultation was too focussed around capacity and not actual housing demand.
- 3.5 Despite the consultation being widely publicised as set out in Appendix 1, only 169 responses were received and this does not represent a statistically significant response. It should also be noted that 51% of the respondents were aged 61 or over and only 4% of the respondents were under 41 (excluding those pupils who participated in the talks at Sir Robert Woodard Academy). These factors also need to be taken into account when considering the approach to future housing provision in the district.
- 3.6.1 Members should note that a typographical error in the consultation material affected option 1, the 'brownfield only' option. The target for the plan period should have read 1150 dwellings 2011-2028, at an average of 67 dwellings per annum, rather than 1105 dwellings 2011-2028 at an average of 65 dwellings per annum. However, this is a difference of 2 dwellings per annum, and is not thought to undermine the integrity of the consultation. Many respondents will have based their choices on the overall principle of 'brownfield only' development, rather than the precise numbers.

Next Steps

- 4.1 It is vital that a thorough assessment of opportunities to meet housing needs/ demands (as predicted in the Locally Generated Housing Needs Study) is undertaken; this will be thoroughly explored in due course at the examination. As the consultation leaflet made clear, options 1, 2 and 3 would not meet forecast demands. Whilst Option 4 could do so, this would require a significant amount of greenfield development and Adur District is tightly constrained due to physical capacity, flood risk and transport issues. There is a balance to be struck between meeting needs and environmental protection. Whereas the South East Plan effectively redistributed housing requirements across the sub-region/ region, this mechanism is no longer available, and difficult choices will need to be made.
- 4.2 Since the consultation was carried out, the government has produced a Draft National Planning Policy Framework (NPPF) for consultation, which it is intended will in due course, replace existing Planning Policy Guidance and Statements. Although not adopted, this is a strong indication of the Government's intentions. This states: 'The presumption in favour of sustainable development means that Local Plans should be prepared on the basis that objectively-assessed development needs should be met, unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against policies in this Framework taken as a whole.' (para 111). It also states: 'Joint working should enable local planning authorities to work together to meet development requirements which cannot be wholly met within their own areas – for instance,

because of a lack of physical capacity or because to do so would cause significant harm to the objectives, principles and policies of this Framework' (para 47).

- 4.3 A report to Adur Cabinet on 22nd March 2011 set out the proposed way forward for the emerging Adur Core Strategy. However, given the publication of the Draft NPPF, the results of consultation, advice received from the Planning Advisory Service and following a meeting of the Adur Local Development Framework and Sustainable Community Strategy Members Working Group, a revised approach is proposed, as follows.
- 4.4 Rather than determining a single housing target for the plan this October, as originally intended, it has been recommended to us by the Planning Advisory Service that further consultation work should be undertaken based on two different housing targets, each illustrated by a few spatial options as to how they can be achieved (eg showing an illustrative diagram of a few site options per target). This would give stakeholders and the public the opportunity to comment on specific site options at two different levels of housing target. This is proposed for the following reasons:
- 1) The June-August 2011 consultation, although useful in determining opinions as to a broad approach, was (deliberately) not site specific.
 - 2) By consulting again using two different housing options, we are still offering the community a 'choice' of housing target and site options, and will demonstrate to the Inspector at Examination that we have explored options and alternatives.
 - 3) By using a higher target (e.g. Option 3) we would go some way towards demonstrating to the Inspector that we have continued to work with the community to consider the implications of trying to get nearer to meeting forecast housing demand.
 - 4) The limited number of response received in relation to size of Adur's population, which is perhaps a small number to base a key decision on.
- 4.5 Due to the changing planning framework, and the potential gap between Adur's predicted housing requirements and physical capacity to accommodate development, it is considered necessary to undertake these actions due to the need to demonstrate that thorough consideration has been given to the issue of the District's ability to accommodate its own development needs, particularly in terms of housing. By focusing on specific sites it is considered that the consultation will inevitably generate more responses, as people tend to react more to site specific proposals.
- 4.6 The two options proposed for further consultation are:
- Option 2 - 105 per annum 1785 homes 2011-2028 – the most popular option in the recent consultation, and is broadly similar to the figure in the South East Pan (also set at 105 per annum) and:
 - Option 3 - 155 per annum 2635 homes 2011-2028 Option 3 would meet more of the forecast housing need than Option 2 and would demonstrate to an Inspector that we have sought to explore the implications of this with the public and stakeholders (although this level would not meet all identified needs).

- 4.7 The Sustainability Appraisal of the options showed that Option 3 would have notably more positive social and economic impacts than Options 1 and 2, but with less significant impacts on the environment than Option 4. Overall this option struck the best balance between the potential social, economic and environmental impacts and would require significant amounts of greenfield land. Responses received to the June-August consultation indicate there is some appetite for consideration of a higher level of housing.
- 4.9 Members should note, however, that neither of these options will fully address objectively-assessed housing demand over the plan period (up to 2028) even if proposed development at Shoreham Harbour is taken into account. Given the Duty to Co-Operate set out in the draft NPPF it will be vital that Adur works with other authorities in West and East Sussex (and potentially further afield) as to how to address housing demands. It could also be argued that Option 4 should be used for consultation, as this meets the needs identified in the Locally Generated Housing Needs Study. However it is unlikely to be deliverable in terms of transport. It is important that transport modelling is undertaken swiftly in order to verify realistic options for consultation.

Approach to Employment Land

- 4.10 The consultation results indicated a clear preference from the respondents for the Economic Intervention scenario regarding the provision of employment land. As a result it is proposed that work on the emerging document includes allocations to reflect this.

Approach to Consultation and Next Steps

- 4.11 It is proposed that if this additional consultation is undertaken, transport modelling work will be carried out first to ensure that options/ site locations consulted on are deliverable. Infrastructure work will also be carried out.
- 4.12 It is proposed that the consultation options be integrated within a Draft Core Plan (regulation 25) document, rather than a stand-alone consultation exercise, in order to save time. This would mean that the two housing targets and site options would be included in a draft plan with other proposed policies, allocations, etc, giving people the opportunity to comment on all aspects of the document – its strategy, potential sites, and detailed policies – seen as a whole. A separate leaflet relating only to the housing targets and site options could be produced for those people interested only in these matters. This approach would give the Council the option of stating a preferred target/ approach based on evidence, although a formal decision to make these choices would need to be made.

Type of Development Plan Document

- 4.13 As Members will be aware, it had been intended to progress a concise Core Strategy (with broad allocations for strategic sites) and then to develop a Site Allocations and Development Management Policies Development Plan Document (DPD) to provide more detail on key sites, and additional, more detailed development management policies (in addition to the strategic ones contained in the Core Strategy).

- 4.14 However, given the need to get an up-to-date plan in place (particularly due to the NPPF and any potential neighbourhood plans that might come forward) and the fact that the Site Allocations DPD would not be adopted for some time it is proposed that the Adur Core Strategy and Site Allocations and Development Management DPD are amalgamated to create a Local Plan. It will still be possible to develop some separate DPDs – for example, the Shoreham Harbour Joint Area Action Plan and in due course, a Gypsy and Traveller DPD. A proposed timetable is attached as Appendix 2. It should be noted that by converting to Local Plan approach does not mean work is ‘starting from scratch’; existing evidence and work will form the basis for this document.
- 4.15 Further work required (for either a Core Strategy or Local Plan) includes: transport modelling, working with infrastructure providers, and developing the Community Infrastructure Levy (CIL). Work on the Shoreham Harbour JAAP is ongoing.

4.0 Legal

- 4.1 The proposed consultation exercise will contribute to the preparation of the Adur Local Plan, part of the Local Development Framework, produced in accordance with the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Development) (England) Regulations 2004.
- 4.2 Section 19(2) of the Planning and Compulsory Purchase Act 2004 Act lists in paragraphs (a)–(j) the matters to which the local planning authority must have regard when preparing a development plan document or any other local development document. Those matters include the regional strategy for the relevant region and the regional strategy for any adjoining region (paras. (b) and (d)). In addition Section 24(1) provides that, outside Greater London "The local development documents must be in general conformity with ... the regional strategy..." The legislation does not preclude the local planning authority from having regard to other matters. Indeed, government guidance on the issue, asks local planning authorities to have regard to the governments intention to abolish regional strategies in any decisions they are currently making.

5.0 Financial implications

- 5.1 Finance for progression of the Core Strategy including community consultation is budgeted.

6.0 Recommendations

- 6.1
- 1) That the results of the Housing and Employment Options consultation held in Summer 2011 are noted;
 - 2) That the proposal for further public and stakeholder consultation using options 2 and 3 is agreed;
 - 3) That the preference of consultation respondents to the Economic Intervention scenario for employment land is noted, and the proposal that this approach is reflected in the emerging planning documents is agreed;
 - 4) That the proposal for the production of a Local Plan, rather than Core Strategy and subsequent Site Allocations DPD is agreed;
 - 5) That the proposed timetable for the Local Plan is agreed.

Local Government Act 1972
Background Papers:

Locally Generated Housing Needs Study. GL Hearn 2011

Adur Employment Land Review Update – Draft Report May 2011

Draft National Planning Policy Framework, Communities and Local Government, July 2011

Local Planning Regulations – Consultation, Communities and Local Government, July 2011

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Schedule of Other Matters

1.0 Council Priority

1.1 The emerging Adur Core Strategy/ Local Plan will help to:

- Promote a clean, green and sustainable environment by protecting the best of Adur's environmental assets, steering development to sustainable locations and through policies to secure sustainable and quality design;
- Revitalise, regenerate and create lively economies through securing economic and town centre regeneration and community wellbeing;
- Contribute to the implementation of the Community Strategy and other partnership initiatives through providing a clear spatial vision for the future of the district and through spatial policies.

2.0 Specific Action Plans

2.1 (A) Corporate Plan 2009-12 Aim 1: The Core Strategy will assist in providing opportunities for working in partnership with other organisations, as joint working will be necessary in order to deliver proposals within the Core Strategy. The Core Strategy is required to go through several stages of public consultation, which creates opportunities for people to take part in decision-making. Aim 2: The Core Strategy will address issue relating to CO2 emissions and adapting to climate change (for example by addressing issues relating to flooding). It will address the delivery of open spaces, and green links. The Core Strategy will set out key principles for development at Shoreham Harbour. It will also address increasing opportunities for walking and cycling, and reduce reliance on the private car, road improvements and addressing congestion. Aim 4: The Core Strategy will encourage use of 'Secured by Design' and promotion of green links and open spaces.

2.2 (B) Local authorities are required to deliver a Local Development Framework, of which the Core Strategy is a fundamental part.

3.0 Sustainability Issues

3.1 The Government requires that all Development Plan Documents be subject to a formal Sustainability Appraisal. The emerging Core Strategy/ Local Plan aims to promote sustainable development.

4.0 Equality Issues

4.1 The Adur Core Strategy (Local Plan) aims to ensure that all groups in the District have equal access to the spatial opportunities offered by the emerging development plan.

5.0 Community Safety Issues (Section 17)

5.1 'Secured by Design' will be encouraged by the Core Strategy/ Local Plan.

6.0 Human Rights Issues

6.1 No negative issues have been identified at this stage.

7.0 Reputation

7.1 Matter considered and no issues identified.

8.0 Consultations

8.1 The report sets out results of a previous consultation exercise held in summer 2011, and proposes a further round of consultation on housing targets for Adur district.

9.0 Risk Assessment

9.1 The Council has a statutory duty to produce the Local Development Framework, and failure to do so could impact on a number of the Council's priorities, including economic and social regeneration and well as the delivery of affordable housing.

10.0 Health & Safety Issues

10.1 Matter considered and no issues identified.

11.0 Procurement Strategy

11.1 Matter considered and no issues identified.

12.0 Partnership Working

12.1 Partnership working will be an integral part of the delivery of the Adur Core Strategy/ Local Plan. A range of proposals will require working between Adur District Council, West Sussex County Council, the private sector, Parish and Town Councils and other groups. Discussions will be held with other local authorities, as referred to in the report.

Appendix 1 - Details of Consultation held 27th June – 7th August 2011

The consultation was publicised through the following means

- A press release was issued.
- The Council's own website;
- Information sent to those on the Planning Policy consultation database (over 400 consultees).
- Publicity information and forms were made available in the Civic Centre reception area;
- Information sent to all members of Adur Viewpoint who have expressed an interest in planning. They were also invited to an evening seminar explaining the key issues held on 13th July.
- Information was made available in all libraries in Adur. Forms were also delivered to Parish Council offices and other locations such as health centres
- Parish Councils were also invited to send representatives to an evening session at Adur Civic Centre to explain the issues, held on 12th July 2011.
- Information/posters/leaflets displayed in local shops etc.
- Sessions were held with three classes at Sir Robert Woodard Academy, where pupils voted on the options.
- Presentations of the options to local community groups, the Local Strategic Partnership Executive Board, and the Shoreham Airport Consultative Committee.
- Officers attended Southwick Fair and Shoreham Farmers Market to distribute consultation leaflets.
- Leaflets left in the Adur Members' Room, for Members to distribute – eg at their surgeries.

The Parish Councils responded after the close of consultation (due to meeting dates) but their responses have been included in the final figures. Key issues raised are as follows:

- Lancing Parish Council – did not support any of the options due to concerns regarding housing densities, infrastructure (including social infrastructure), drainage problems in the areas, and in respect of employment, the Parish Council were concerned that there is already a significant number of empty business properties in the area.
- Sompting Parish Council – reluctantly supported housing option 1 and employment option A. However, the Parish Council expresses a number of concerns regarding the loss of the Strategic Gap between Lancing/Sompting and Worthing and the subsequent potential loss of the character of Sompting, and the worsening of the existing congestion problem on the A27 and A259.

Summaries of responses received may be found in the Adur Members' Room for information.

Appendix 2: Proposed Timetable: Adur Core Strategy/ Local Plan

	Adur Core Strategy/ Local Plan Timetable
2011	
June	Reg 25 consultation
July	Reg 25 consultation
Aug	Reg 25 consultation
Sep	
Oct	Further evidence gathering
Nov	
Dec	Further evidence gathering
2012	
Jan	Further evidence gathering
Feb	Further evidence gathering
Mar	
Apr	
May	
June	Agree document for consultation
July	Consult on Draft Reg 25 Local Plan (inc 2 housing targets)
Aug	Consult on Draft Reg 25 Local Plan (inc 2 housing targets)
Sep	Analysis
Oct	Revisions
Nov	Members to agree single housing target following consultation
Dec	Revisions
2013	
Jan	Revisions
Feb	Revisions and formal agreement of document
Mar	Publication of Reg 27 submission version
Apr	Publication of Reg 27 submission version
May	Submission
June	(as above)
July	
August	Hearing
September	Inspector's Report
Oct	
Nov	
Dec	
	Adoption