



Note on the work Arun District Council has carried out during the suspension of the Arun Local Plan Examination in Public and how the conclusions have influenced the revised strategy proposed in the Main Modifications

July 2017

1. Introduction

This note sets out the background of the Arun Local Plan, the work Arun District Council has carried out during the suspension of the Local Plan Examination in Public and how the conclusions have influenced the revised strategy proposed in the Main Modifications.

2. Background

The current Arun Local Plan was adopted in 2003. Production of a new 'Core Strategy' began in 2005 with consultation with statutory bodies, utility and service providers. A whole suite of evidence base studies were undertaken to inform the Arun Core Strategy: Options for Growth, which went out for consultation in spring 2009.

In 2012 new evidence informed the preparation of the Draft Local Plan 2013-2028 which was consulted on in summer 2012. A final document was then presented to Full Council in May 2013 but there was a request for further work to be undertaken relating to housing figures. The full publication version of the Arun Local Plan 2011-2031 was published for Regulation 19 consultation in October 2014 and submitted for independent examination to the Secretary of State via the Planning Inspectorate on 30th January 2015.

Initial Examination sessions were held in June 2015 discussing legal and procedural requirements and three specific sites at Barnham/Eastergate/Westergate; Littlehampton Harbour / Littlehampton Economic Growth Area including West Bank; and Enterprise Bognor Regis. A Procedural meeting was held in July 2015 and following this, the Inspector provided his conclusions and observations on the matters covered by the hearings.

As new evidence relating to the Objectively Assessed Need (OAN) for housing had been produced in March 2015, it was determined that there should be a specific consultation on this followed by a hearing session. This resulted in a note from the Inspectors on what they considered the starting point for the OAN to be.

The stages of production of the Local Plan are set out within Appendix 1.

3. Suspension

The Arun Local Plan 2011-2031 has been suspended since February 2016. During this period, an extensive part of the evidence to inform the content of the Plan has been updated, including the required Environmental Assessments. These have informed a number of Main Modifications proposed to the plan that were consulted on from 10th April – 30th May 2017. The following table summarises this.

July 2016 - March 2017	Publication of evidence on website under Latest News, as finalised LPSC and Full Council approvals of main modifications for consultation
April-May 2017	Main Modification consultation

New evidence

As mentioned above, due to the significant increase in the level of housing the Plan was considering to accommodate, numerous parts of the evidence base required updating. For ease these are listed below in the order of the parts of the Plan to which they relate. The numbers following the names are those from the Examination Library primary and secondary evidence.

Whole Plan

- Sustainability Appraisal –
Scoping Statement [PELP30];
SA of the Main Modifications [PELP28a];
Non-Technical Summary of SA of Main Modifications [PELP28b] and Appendices to SA of Main Modifications [PELP28c]
- Habitats Regulations Assessment: Supplementary Work Stage 3 Report: Appropriate Assessment [PELP33]
- Housing Implementation Strategy [PELVP22] – see under Living Place

Sustainable Place

- Arun Landscape Capacity Study a [PESP5a-e]

Prosperous Place

- Arun Employment Land Needs Update [PEPP6]
- LEGA Development Delivery Study [PEPP7]
- Arun Retail Study 2016 Update (Final) [PEPP8]
- Employment and Enterprise Local Plan Background Paper [PEPP9a]
- Commercial Property Market Intelligence Report [PEPP9b]

Living Place

- Local Plan Viability Assessment Update (Final) [PELVP21]
- Housing Implementation Strategy [PELVP22]
- Updated Housing Needs Evidence [PELVP23]
- Indoor and Built Facilities Needs Assessment [PELVP24]

- Indoor Sport and Leisure Facilities Strategy [PELVP25]
- Playing Pitch Strategy Assessment Report [PELVP26]
- Playing Pitch & Outdoor Sports Strategy Action Plan [PELVP27]
- Draft Open Space Assessment Report [PELVP28]
- Final Open Space Standards Paper [PELVP29]
- Final Open Space Assessment Report [PELVP30]

Connected Place

- Arun Transport Study Stage 3 [PECP9]

Protected Place

- Arun SFRA Update [PEPTP10]
- Arun SSWMS Final Stage 1 [PEPTP6]
- Arun SSWMS Final Stage 2 [PEPTP7]
- Arun SSWMS Executive Summary [PEPTP8a]
- Sequential and Exception Test [PEPTP9]

Deliverable Place

- Arun ICSDP Phase 1 [PEDP4] and
- Arun ICSDP Phase 2 and Phasing Plan [PEDP5]
- School Provision in Arun District [SEDP3a]
- Appendix 1 Strategic Housing Primary Education Requirements [SEDP3b]
- Appendix 2 Strategic Housing Secondary Education Requirements [SEDP3c]
- Strategic Growth Assessment Arun [SEDP4].

Following the order above, a summary of the work is discussed below, including the main conclusions which have informed the main and minor modifications to the Plan.

Whole Plan

Sustainability Appraisal

In June 2016 Land Use Consulting (LUC) was commissioned to undertake the Sustainability Appraisal (SA). The Council originally identified 4 scenarios to test options for the provision of housing (650dpa, 758dpa, 845dpa and 1000dpa) and developed 5 distribution scenarios under the 4 housing growth scenarios which encompassed a variety of locations across the District. The 1000dpa was a theoretical figure the Council set to test whether it is sustainable to achieve a higher level of housing growth which would provide for a genuine opportunity to consider unmet need within the housing markets area.

In September 2016 an updated housing needs evidence report was prepared which identified a revised OAN of 919dpa. In light of the revised OAN, it was considered no longer necessary to test a range of potential quantum options as the 4 growth options were superseded. This further uplift meant that all preferred sites would be required to meet the higher OAN.

Importantly, this process and the revised SA have taken into account all the new evidence and the main modifications proposed to the plan. It has brought these together through the detailed appraisals, as well as a detailed explanation of how unmet need has been factored in. All reasonable site options, as well as policies and site allocations, have been appraised in the SA. The existing framework and the numerous indicators have also been reconsidered to make it easier to use and read.

The main modifications propose a large amount of housing (1000dpa) and employment development across the District to meet future needs. The SA has identified the potential for negative effects on many environmental objectives; however, it takes account of the inclusion of a wide range of Development Management policies within the Plan to protect and enhance the economic, social and environment conditions of the District. The majority of these policies provide appropriate mitigation to address the potential negative effects. Various major and minor changes have been inserted reflecting recommendations from the SA, such as MM53.

Habitats Regulations Assessment: Supplementary Work

There were three stages to this work - gathering of an accurate baseline of the ecological characteristics of all the locations being considered for development within the main modifications; identification of likely significant effects on designated sites; Appropriate Assessment..

The work identified new information relating to two pathways. These pathways were supporting habitats and possible water pollution. In addition, the new potential site of the Solent & Dorset SPA was included and Arun Valley was also brought back into consideration. As a result of this, two focused consultations were held with the statutory bodies. The responses were considered and necessary modifications incorporated into the Plan. The last two stages of this work identified the following pathways - disturbance; invasive non-native species; impact on supporting habitats; water resources and abstractions; water pollution and other significant likely effects - that could be affected; and then analysed the possibility of impacts regarding these. Overall it concluded that there would be no adverse impact on the integrity of the site from any of these pathways based on the mitigation measures that have been incorporated into the Plan, at MM22-MM25 and MM55 plus supporting MC210.

Sustainable Place

Arun Landscape Capacity Study (a-e)

This study involved analysis of landscape character and landscape value and detailed analysis of the possible strategic sites.

The findings of the study have then informed the revised development strategy and allocations, as well as the formulation of green infrastructure strategies for each location. These were then included as Main Modifications. The boundaries of the sites were refined according to the evidence such as Pagham North. Ferring East and Middleton were discounted for landscape reasons. The other strategic sites in

the strategy do have smaller defined areas within the sites, which have low capacity for absorbing growth, but these are countered by the presence of at least one other in the same site, with a high landscape capacity. Additionally policies seek to mitigate this through design requirements such as green corridors or green spaces. This has been taken forward into a number of the Main Modifications, such as MM9 and MM22, as well as where applicable MM23-25.

Prosperous Place

Arun Employment Needs Update

This report builds on the previous employment work and provides updated estimates of requirements for employment floorspace and considers this against the currently identified future land supply within the District.

LEGA Development Delivery Study

This study addresses issues raised by the Inspector and provides robust evidence that can be used both regarding the soundness of the site's allocation and to form the basis of its delivery. In terms of delivery, the study recommended that the boundary of the location should be widened to ensure its viability and ensure delivery of certain aspects. The main elements covered in the study are:

- The constraints relating to the site;
- An assessment of sites in relation to capacity for housing and commercial uses;
- A review of the flood risk position and strategy for protecting the West Bank;
- Testing the viability of the proposed scheme, including major infrastructure costs;
- Outlining delivery mechanisms to bring forward development at West Bank and the East Bank/Town Centre area, plus providing a timetable for delivery of the West Bank proposals.

The study has informed a number of the Main Modifications, including MM24. The key conclusions from the study are discussed below.

Further work, updated modelling, and full involvement in the study by the Environment Agency has been undertaken. It has been agreed that this can be reclassified as 3a which is the highest risk rather than functional floodplain. Detail is contained in section 5 of the study and Appendix J of the Strategic Flood Risk Assessment (SFRA) Update.

Despite the significant flood risk affecting the location both now and in the future, it is possible to deliver a flood defence scheme that would mean the development is safe throughout its lifetime. Viability has been tested in section 6 of the study, as well as the overall location being included in the Infrastructure Capacity and Delivery Plan accompanying the Main Modifications. In terms of timing it shows that this could begin soon after adoption of the Plan, with on-site work beginning around 5 years later and completed by the end of the plan period, as detailed in section 7 of the

study. The outcomes have informed MM24. Progression between the landowners is detailed within the separate MOU.

Arun Retail Study

This provides an update to the 2013 study through using the 2014 Experian data. The main conclusions are that the need for additional retail floorspace is not impacted significantly by the location of housing developments as long as the overall balance between east and west of the river is maintained. Taking account of the change to consumers buying more locally, it does recommend that provision of local shopping should be included in larger developments. This has been incorporated through MM23-25.

Employment and Enterprise Local Plan Background Paper

This reviews the requirement for employment floorspace on the basis of the latest evidence and identified future land supply.

Alongside the updated Housing Needs Evidence (OAN) it identifies that Arun has two Functional Economic Market Area (FEMA) – one covering Bognor Regis and the area to the west and the other covering Littlehampton, Arundel and the area to the east. It recognises that there may be a role for the District to accommodate some of the unmet need from the neighbouring areas, although this would be after the District had met its own needs.

Commercial Property Market Intelligence Report

This report considers the stock of industrial, warehouse and office premises, generally found in the main town centres, and whether they were fit for purpose. It was found that there are few vacant units, but that there is a lack of modern premises, which restricts expansion or upgrading. 2016 figures show that Arun District has a total industrial/warehouse stock in the region of 499,000 sqm and office stock of 49,000 sqm.

Since the 2008 there has been little office and industrial development due to viability issues but the Rolls Royce development at Oldlands Farm has acted as a catalyst, with an upswing in activity. Though previously transport infrastructure had acted as a deterrent in terms of attracting new business, the completion of the Bognor Regis Relief Road has improved the attractiveness of Bognor Regis as a location. The proposed relief road and Lyminster Bypass on the northern edge of Littlehampton is expected to have a similar effect, improving access to the A27.

Recent developments, such as the new Rolls Royce developments, show that there is an appetite for space in the market and if not available in a centre, occupiers will expand their searches. There are signs that the market is improving, however while there are viability issues, then it is likely there will continue to be a shortfall in terms of delivery.

Living Place

Local Plan Viability Assessment

The focus of this document is whether delivery of the overall Plan is viable. It also advises on affordable housing and the implications of the multiple changes that have occurred since the Plan was submitted. It considers viability with respect to the deliverability of larger and strategic housing sites, bearing in mind the need for infrastructure and mitigation. It then suggests levels of commuted sums that may be appropriate where affordable housing is not provided on-site. The assessment identifies that there will be sites that are unviable even without policy restrictions and that there will be a number that become unviable when these are applied.

Housing Implementation Strategy

The Housing Implementation Study (HIS) sets out the latest update on housing need [PELVP23], taking the 2014 Sub-National Population Projections issued in May 2016 and applies the methodology agreed by the Inspectors to these new projections. These result in an increase to the Objectively Assessed Housing Need above the 845dpa agreed by the Inspectors, to 919dpa (18,380 over the plan period).

Taking into account past completions there remains a shortfall of 1,548dpa that is required to be added to the residual requirement. Overall, this means that the Council currently has a housing land supply position of 1.92 years on adoption of the plan.

Where housing completions fall short of the annualised target figure, Councils are required to make up the shortfall and for this to be added to the annualised target. Another aspect that has to be incorporated in the figures is a buffer. Where there has *“been persistent under delivery, Councils should increase the buffer to 20%...”* and so this has been accepted as appropriate by the Council. There are two recognised methodologies for doing this – Sedgefield and Liverpool.

Using the Sedgefield method there is an annualised requirement of 1,474dpa. Although there has been an increased supply in Arun in response to local need, achieving 1,500dpa is not considered to be a realistic or deliverable amount in the short term.

If the Liverpool method is employed then there is an annualised requirement of 1,227dpa. This is considered very challenging, however, there would be at least a greater prospect of achieving this than the higher Sedgefield figure. These increase the housing land supply to 3.8 years and 4.6 years respectively on adoption of the plan. As set out in paragraph 2.10 of the HIS, the Council believe that as this would result in a significant uplift in the rates of delivery, there are no further options available to it at this point to deliver and sustain such high numbers.

For the strategic sites, it is identified that delivery of these will be initially challenging to include in the 5 year housing land supply and as such there will be long lead in times between allocation, permission and first completions. This means that they only make a small contribution towards addressing the shortfall in the first 5 years.

This is particularly the case for four sites that are expected to be delivering 1,000+ dwellings.

In summary, recognising the issues facing housing delivery in the District, the Council has approached this using the Liverpool method. It considers that there are a significant number of issues affecting housing supply connected with delivery of infrastructure. As a result it presents:

- A Stepped trajectory; and
- Addresses certainty through the intention of a Small Sites DPD.

This Main Modification is shown through the new policy presented as MM21.

Updated Housing Needs Evidence

Further work was undertaken to update the housing needs evidence with the latest 2014 sub-national projections. It considered whether there were any implications from the revised figures and provides an updated assessment of the need for differing types of homes. The difference between the latest projections and those from the 2012 set at 8.7% is not insignificant. It is considered that there will be some uncertainties regarding future trends; however, this is a reasonable basis for adjusting housing provision within the plan.

In terms of starter homes it suggests an allowance of 10% of provision as starter homes. In addition, the report identifies a need of 2,257 units through sheltered or extra care provision. This translates into 113 homes per annum and 12% of the overall housing need. It broadly recommends 60% of specialist housing should be for the market and 40% as affordable. Additionally there is a need of 991 residential care/nursing home bed spaces, roughly 50 units per annum.

Also, it is suggested that support should be given to Build to Rent schemes, as well as there being a need for self and custom build developments. Widening the sectors delivering housing may assist in boosting housing delivery. A number of these key conclusions have influenced modifications points p and q of MM22; MM26 and MM28.

Indoor and Built Facilities Need Assessment

This focuses on the current situation regarding sports halls, swimming, lawn bowls and skate facilities. There is little surplus in the District for sports halls. In terms of swimming facilities the current supply for water space is unable to meet the demand generated by the existing population, meaning there is a shortfall of 350m² of water space. The new Littlehampton Leisure Centre will have 8 lanes rather than 6, so this will help to accommodate part of the additional requirement. In terms of Bowls, there is only one green in the District, located in Bognor Regis. There is not currently demand for any indoor facilities.

Indoor Sport and Leisure Strategy

This sets out how a 'fit for purpose' network of facilities, such as swimming, gymnastics, bowls and skating facilities, can be created to ensure residents stay as physically active as possible, over the plan period. An Action Plan for each facility is contained in the study, followed by suggestions of ensuring the required funding through obligations.

This strategy has informed multiple changes that have occurred throughout Chapter 14, included as MM36-46.

Playing Pitch Strategy Assessment Report

As well as current demand, this work considered whether future demand could be met. Current shortfalls are evident across adult and youth 9v9 pitches, whilst future demand results in a shortfall of each pitch type, with the exception of mini pitches. There are three 3G pitches across the District and there is a current shortfall of two for the District as a whole. The results from this report have informed specific mention within site policies and so MM23-25, as applicable.

Playing Pitch & Outdoor Sports Strategy Action Plan

This document provides a strategic framework for the maintenance and improvement of existing outdoor sports pitches and ancillary facilities between 2016 and 2021. The aim of this strategy is to form a basis for the protection of existing facilities, the determination of applications and local policy, plus on-going monitoring. Modifications MM23-25 incorporates requirements for pitches into the location specific parts of the policies as appropriate.

Draft Open Space Assessment Report

This sets out what exists, its condition, distribution and overall quality for a number of different types of open space. The typologies within the study are parks and gardens; natural and semi-natural greenspaces; amenity greenspace; allotments; green corridors; cemeteries, disused churchyards and burial grounds; civic spaces and areas designated primarily for play and social interaction involving children and young people, such as Multi Use Games Areas (MUGA).

Final Open Space Standards

This document should be read in conjunction with the Draft Open Space Assessment. This identifies the deficiencies and surpluses in terms of existing and future provision, as well as helping to form the basis for securing facilities and their maintenance. It concludes that low quality sites should be prioritised for enhancement, high quality sites should be protected, recognises areas with surpluses in open space provision and how these could help meet other needs and that the need for additional cemetery space should be led by demand. It also makes reference to the fact that contributions towards open space should be sought from commercial developments, as well as the potential appropriateness of off-site provision.

Connected Place

Arun Transport Study

The Transport Study assessed the development proposed in the revised strategy included in the Plan. The impacts in the assessment are based on criteria agreed with the authority; WSCC as highway authority and Highways England. Where junctions were determined to be adversely impacted by development, a set of appropriate mitigation schemes were devised and tested. These mitigations removed all 'severe' impacts. Although severe impacts were identified these could all be addressed by suggested or committed mitigations included in the study.

The study identifies 15 junctions with severe capacity impacts, 3 with district-wide road safety issues and 8 where total flow increased above 30% indicating environmental issues. Two of these associated with the Ford Level Crossing are also identified as having a significant risk, although these could be mitigated by a railway bridge.

This has specifically been included into the modifications as MM47; MM52 and MM71.

Protected Place

Strategic Flood Risk Assessment Update

This was prepared to replace and update the information contained in the 2008 assessment. This work informed both the progression of potential locations as detailed in the SA of the Main Modifications and both minor and more major modifications put forward. The main outputs that have changed with respect to the potential locations was the extent of flood risk affecting North Middleton, which worsened so significantly with climate change that it was not considered realistic. For the remaining locations there were 8 main issues, which were:

1. For all locations, with the exception of LEGA and Bognor Enterprise the majority (90%+) of the land was within Flood Zone 1.
2. Bognor Enterprise is shown to be highly susceptible to fluvial flooding with 58% of the site in flood zone 3a and a further 6% in flood zone 2. The majority of this is the eastern parcel of land and east of the railway, where no significant development is expected. Whilst intended for employment use (less vulnerable) and so suitable in 3a, consideration will still be required to specific measures so it can be developed without increasing flood risk elsewhere.
3. LEGA is equally predicted to be highly susceptible to fluvial flooding with 10% of the site located in flood zone 3b, 59% in 3a and a further 4% in flood zone 2. Flooding spreads across both the east and western areas, although depths are noticeably greater on the western side. Under climate change, flooding and the extent of the flood zones are expected to expand. This means that consideration for managing the residual flood risk will be required.

4. Though the sites are not shown to have significant issues with surface water, LEGA has the greatest proportion affected by this source of flooding, with 12% covered by the 1,000 year extent and 6% covered by the 30 of 100 year extents.
5. 2 of the locations are located in groundwater vulnerability zones – a small proportion of Barnham/Eastergate/Westergate and Yapton. As such special consideration of SUDS will be needed to ensure suitable treatment before discharging
6. BEW, Bognor Enterprise, Ford and LEGA have parts within them that have been designated by the Environment Agency as landfill. Other sites also border designated landfill sites. For all of these it will be necessary for ground investigations to occur to determine the extent of the contamination and therefore the impact on SUDS.
7. As there are numerous sites that are protected by flood defences meaning that the flood extents for given events have been much smaller than shown, due to the flood extents being based on the undefended case. The role of defences should be considered during site FRAs. It will be crucial during this time to understand how the maintenance and standard of protection may change over time. Where defences provide benefits it will be important for the management of residual risk, such as a breach of the defences, to be considered.
8. A number of potential locations have been shown to have potential concerns regarding safe access and egress. These are Enterprise Bognor Regis and LEGA. At planning application stage it was agreed that consideration should be given to the provision of safe access and egress to and from these in terms of flood from fluvial, tidal, coastal or surface water.

As a result of this work a number of changes have occurred that are contained within MM20-25.

Strategic Surface Water Management Study (SSWMS)

There have been longstanding issues in terms of drainage in the Lidsey catchment and recurring issues connected with Aldingbourne Rife, so this study focuses on the potential locations in these catchments. Eight schemes were developed to manage surface water associated with six potential locations (Pagham North; Pagham South; West of Bersted; BEW; Bognor Enterprise and North Middleton) in terms of both onsite and offsite solutions.

Stage 2 of the work identified individual SUDS measures that would be recommended for each of the sites plus a couple of off-site schemes. Site promoters were involved during Stage 3 as schemes were developed.

This has influenced changes contained within 12.1 and H SP2a-c included as MM20 and MM23-MM25.

Sequential and Exception Test with Appendix

This document pulls together information relating to flooding at each of the sites and goes through how the sequential test has been passed and, where necessary, takes

sites on to the Exception stage to show if they could be made safe during their lifetime.

Deliverable Place

Arun Infrastructure Capacity Study and Delivery Plan (ICSDP) Phase 1

This provides an update relating to the level of existing infrastructure. For a number of the infrastructure types, it is clear provision is a cumulative impact based on combined need of the area due to District wide development rather than being linked to one location. There is potential for some provision to be severely affected. For the majority the issue is more to do with phasing rather than preventing development. Importantly viability is the result of multiple infrastructure projects opposed to constraints presented by one particular project.

Arun ICSDP Phase 2

This supplements and refines the requirements to mitigate impacts from delivering the key Strategic Sites. It also suggests the costings and timings involved and which is the best route to use for the type of developer contribution most appropriate to fund things.

A table has been included identifying which locations will need to contribute towards shared facilities. It goes on to recommend the size of entry for secondary schools. The conclusion from the Clinical Care Group (CCG) is that there are 3 locations where facilities will be needed as part of 'Hubs', with 50% of the space used for primary care. Due to there being no finalised plan from Southern Water it was assumed for this piece of work that Ford and Lidsey WWTW would require upgrading.

Further evidence on education and wastewater provision are contained at the end of the Secondary Evidence. These are: School Provision and Appendices from West Sussex County Council and a *Strategic Growth Assessment Arun from Southern Water*.

4. Conclusions and change to strategic approach

The main change to the strategy within the Plan is the significant increase in the amount of housing need to 919dpa which required a strategy with increased development including a housing target of 1,000 homes per year. Work during the suspension period, therefore, began by ensuring that environmental assessments were undertaken throughout the process to assess any potential impacts that may occur as a result of the revised strategy. To inform this existing evidence was updated relating to environmental (landscape, flood risk), social (playing pitches, transport, ICSDP, viability) and economic issues (commercial property, retail study, LEGA Development Delivery Study).

Both the SA [PELP28a] and HRA Appropriate Assessment [PELP33] set out the methodologies applied to each of the environmental assessments. The Appropriate Assessment concluded that with some additional recommendations to the wording of policy ENV DM2 and supporting part 17.1, there would be sufficient mitigation delivered by the Plan for there to be no effect to the designated sites.

The SA sets out the progression of all the locations considered for potential inclusion in the Main Modifications. Although the detailed appraisals have identified potential negative effects on a number of environmental objectives, it concludes that the Plan contains appropriate policy mitigations to protect and enhance the District.

Taking the outcome of the environmental assessments against the amended strategy meant that although a number of infrastructure and environmental issues remained from the evidence, there were no showstoppers. In addition, particularly in terms of employment, there was scope to address both the District's needs and some unmet need from neighbouring authorities without there being significant impacts that could not be mitigated. As such a revision to the beginning of Chapter 12 of the submitted Plan was required and has been incorporated as MM20-25 and MM7, as well as MM10 and 11, to more clearly establish the strategic approach in response to previous comments.

The main change to the strategy has been the inclusion of further locations and specific amounts of residential development that these are expected to accommodate through the plan period. The quantum was based on those amounts previously provided to the Authority and information from the updated Housing and Economic Land Availability Assessment (HELAA). The wider spread of locations was determined on the basis of the need to be addressed and previous views expressed that development should be spread across the District. The choice was also supported through the intentions of some of the neighbourhood planning groups (e.g. Ford).

Other issues resulting from the content of the evidence studies, such as the SSWMS, have been integrated into policies or contained as minor modifications to the supporting text contained in the Plan.

Appendix 1: Stages of production of the Local Plan.

The following table summarises the stages of production of the Local Plan.

2005	Work began on Core Strategy
2011	Consultation on Housing and Economic Growth figures
2011-12	Pause on production
2012	Draft Plan consultation
2013/14	Presentation to Full Council for Consultation. Request for further evidence on housing figures
Feb 2014	Publication of Plan covering all the non-contentious issues
Jul/Sept 2014	Publication of full plan and approval for consultation
Oct 2014	Reg 19 consultation
Jan 2015	Submission to Secretary of State (via PINS)
Mar 2015	OAN Update report
June 2015-Feb 2016	Initial Hearings and Examination
Feb 2016	Suspension
June 2016-Mar 2017	Further evidence informing Main Modifications