

Insp-Para	Section	Inspector Comment	ADC Response	Change IMM or IAM	Suggested Change
1 to 3	N/a	Background information	No response required	None	N/A
4	Overview	Paragraph 153 of the National Planning Policy Framework (NPPF) encourages each local planning authority (LPA) to produce a single LP. Although I understand that the County Council (CC) are responsible for the Minerals and Waste LP[1] and Neighbourhoods Plans have also been made and others are in the pipeline, further clarity needs to be provided as to what other Development Plan Documents (DPDs), if any, the Council envisage will be prepared. In this respect there is reference in the LP and/or the Local Development Scheme (LDS) (PELP35) to a Small Sites DPD, an Employment Allocations DPD and a Site Allocations DPD for Gypsies and Travellers. Putting to one side whether it is reasonable to defer such issues to a later DPD, the LP should make it clear at the outset the scope and type of LP and what it will not address (MM) .	The Council acknowledges that the Local Plan can be clearer in relation to the scope of further DPD's that will be produced. Where there is reference to these in specific sections the changes are addressed in the relevant chapters.	MM2	See amended text to clarify what other DPD's ADC propose to prepare. See full text in Main Modifications table.
5	Overview	In paragraph 2.5 there are incorrect references to the NPPF and the National Planning Policy Guidance (NPPG). In addition the paragraph is very long (AM) .	The Council acknowledges this and is proposing an additional modification accordingly.	AM23	Correct NPPF and NPPG references within Para 2.5 and simplify. See full text in Additional Modifications table.
6	Overview	In paragraph 2.22 there is a missing word in the final sentence – 'incorporated'? (AM) .	The Council acknowledges this and is proposing an additional modification accordingly.	AM24	Add word 'incorporated'
7	Spatial Portrait	The paragraph 3.7 there is reference to the 'six villages' and then a description of the role of each of them apart from Aldingbourne. Additional description should be included (AM) .	The Council acknowledges this and is proposing an additional modification accordingly.	AM25	Include additional description for Aldingbourne. See full text in Additional Modifications table.
8	Strategic Objectives	On page 36 the LP sets out the strategic objectives. The 5 th of these relates to the landscape and should refer to protecting and enhancing the setting of the South Downs National Park (SDNP) (MM) .	The Council acknowledges this and is proposing a main modification accordingly.	MM3	Add reference to 'protecting and enhancing the setting of the South Downs National Park.' See full text in Main Modifications table.
9	Sustainable Development	There is no need to reiterate policies set out in the NPPF[2]. The 2nd part of Policy SD SP1 does this and therefore should be deleted (MM) .	The Council acknowledges this and is proposing a main modification accordingly.	MM4	Amend as suggested delete 2nd part of Policy SC SP1. See full text in Main Modifications table.
10	Sustainable Development	In relation to Policy SD SP1a there is no reference to flood risk despite significant undeveloped areas within the District being within Flood Zones 3a and 3b (MM) .	The two references (introductory paragraph and f) refer to coast or coastal plain alluding to the flood prone topography but ADC accept a more specific reference can be added as suggested. Environment Agency will be asked for comments on the change to inform ADC matters statement.	MM5	insert new criteria j about flood risk. " <u>....ensure that development, particularly in the undeveloped areas of the District, takes account of the coastal topography to mitigate and adapt to climate change, especially in high risk flood areas</u> "

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11	Sustainable Development	Policy SD SP1a or Policy EMP SP1 do not refer to how much employment land needs to be allocated to meet future needs whereas in contrast mention is made of the 20,000 homes to be delivered. The strategic employment allocations provide some 80 ha but this is well in excess of the highest land requirement set out in the Arun Employment Land Needs Update (PEPP6) based on past take-up. Noting the aspiration to increase job densities is the extent of allocations justified elsewhere in the evidence base? Should specific reference be made to employment land needs within one of the policies (MM)?	The Council acknowledges that Policies SD SP1a and EMP SP1 could be modified to provide greater clarity in relation to the quantum of employment needs and future planned provision in the District. The evidence in relation to future employment land needs is set out in PEPP6 and PEPP9. The Council is also in the process of producing and agreeing a Memorandum of Understanding with neighbouring authorities which will further clarify the position with respect to the aspirations, increasing role and importance of the District in meeting the economic and employment needs of the Functional Economic Market Area. The employment evidence base identifies that whilst the plan may identify an oversupply in quantitative terms, this does not take into account qualitative factors of supply and the need for future flexibility. Requirements based on past take-up are significantly higher than those indicated by the 'labour supply' employment scenario forecasts, reflecting the fact that Arun has performed strongly in terms of delivering new space over the past decade.	MM6	Criteria d of Policy SD SP1a to be amended to read 'provide for the economic needs of the community by allocating circa 80 hectares of employment land to meet the future needs and aspirations for the District to support the regeneration of Bognor Regis and Littlehampton, support job creation, provide for the needs of modern business, increase the attractiveness of the District as a business location, and support the economic development of the coastal market area'.
12	Settlement Structure and Green Infrastructure	Paragraph 7.2.7 explains the principles that are used in defining the extent of the Built-Up Area Boundary. However, the boundaries do not encompass strategic allocations even though paragraph 7.2.8 goes on to explain that site specific allocations may alter the extent of the Built-Up Areas. What is the reason for this apparent inconsistency? It would seem more logical to me to include the strategic allocations with Built-Up Area Boundaries (MM).	Paragraph 7.2.7 will be amended to include reference to the strategic sites Paragraph 7.2.8 - should be reviewed to ensure that the text within it is clear. When the extent of the areas which meet the requirements of paragraph 7.2.7 are known a revised BUAB will be drawn on the Policies Map. A proportionate approach has been taken to producing a final version of the Policies Map. Main Modification MM66 partly addressed this, but further MM suggested by ADC to confirm all the sites that will be included in the BUAB according to paragraph 7.2.7.	MM7/MM8	Amend paragraph 7.2.7 to include an additional bullett point which makes reference to the strategic allocations. Amend paragraph 7.2.8 to remove the following text: "...a Neighbourhood Development Plan—providing these do not reduce the coverage of a Built-Up Area Boundary."
13	Settlement Structure and Green Infrastructure	I suggest that Policy SD SP2 would be more effective if expressed along the following lines: <i>'Built-Up Area Boundaries are defined for the main towns and villages in the District and shown on the Policies Maps. Development should be focused within the Built-Up Area Boundaries and will be permitted, subject to consideration against other policies of this Local Plan.'</i> Assuming that strategic allocations are included within the boundaries then the 2nd sentence would not be necessary as development beyond the boundaries is covered by Policy C SP1. I do not consider that 2nd paragraph of the policy is necessary as it is stating the obvious. Moreover, it is not clear what 'providing these do not reduce the coverage' means (MM).	The Council acknowledges this and is proposing a main modification accordingly.	MM9	Amend the text as suggested

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14	Settlement Structure and Green Infrastructure	Assuming that Policy SD SP2 is modified as suggested then Policy C SP1 would also need amending to remove reference to allocations. Safeguarding the countryside for its own sake no longer forms part of national policy. The policy would be more clearly expressed along the following lines: <i>'Outside the Built-Up Area Boundaries as identified on the Policies Maps land will be defined as countryside and will be recognised for its intrinsic character and beauty. Development will not be permitted in the countryside unless it is...etc.'</i> In relation to the 2nd paragraph is this necessary as the exceptions would be dealt with under a. to f. in any case (MM) ?	The Council acknowledges this and is proposing a main modification accordingly.	MM10	Amend the text as suggested and delete the second paragraph of C SP1
15	Settlement Structure and Green Infrastructure	Policy GI SP1 refers to Green Network Maps. I assume that the reference in the policy to the Technical Appendix should be deleted (AM) . Where can the Green Network Maps be found? Would it be possible to include the Green Infrastructure Network on the Policies Maps?	ADC agree that the reference in the policy should be deleted (AM). Unfortunately it is not possible to add the Green Network Maps to the Policies Maps due to the level of detail included. The Green Network Maps will be published separately by the Council as a standalone document which can then be updated as required. As a result no changes are proposed to the Policies Maps.	AM26	Delete the reference to the technical appendix in the first paragraph of Policy GI SP1.
16	Settlement Structure and Green Infrastructure	The last paragraph of the policy refers to 'gaps between settlements' but it is doubtful whether these fall within the definition of Green Infrastructure (paragraph 7.3.6 refers). In any event they are protected by Policy SD SP3. In these respects consideration should be given to deleting the final paragraph (MM) .	The Council acknowledges this and is proposing a main modification accordingly.	MM11	Delete the final paragraph of policy GI SP1
17	Settlement Structure and Green Infrastructure	Policy SD SP3 should make reference to the fact that the 'Gaps Between Settlements' are defined on the Policies Maps (AM) .	The Council acknowledges this and is proposing an additional modification accordingly.	AM27	Include reference to the fact that the 'Gaps Between Settlements' are defined on the Policies Maps. See full text in Additional Modifications table.
18	Settlement Structure and Green Infrastructure	The first part of Policy LAN DM2 would benefit from some rewording for clarity (AM) . The following is a suggestion: <i>Development will not be permitted within the area identified on the Policies Map which would adversely affect the views of the town of Arundel, its castle, cathedral and its special setting. Any development, including the proposed A27 Arundel bypass, will be of a high design standard that reflects the quality of the landscape and the setting of Arundel. No development will be permitted, particularly within the area shown on the Policies Map, which would adversely affect the rural views outwards from the town and in particular from the following locations etc.'</i>	The Council acknowledges this and is proposing an additional modification accordingly.	AM28	Amend the text as suggested.
19	Employment and Enterprise	As indicated above Policy EMP SP1 does not identify the amount of employment land that needs to be allocated (MM) . There are typos in criterion f (AM) .	See above - the Council acknowledges that Policy EMP SP1 could be modified to provide greater clarity in relation to the quantum of employment needs and future planned provision in the District. MM Typos in criterion f will be amended through an AM.	MM12/AM29	The first paragraph of Policy EMP SP1 to be amended to read 'The Council, with partners, will promote the sustainable growth of the District's economy to meet the varying needs of different economic sectors and to support regeneration with the two main towns. The Plan allocates circa 80 hectares of employment land in order to provide sufficient flexibility to meet the future needs and aspirations for the District to support the regeneration of Bognor Regis and Littlehampton, support job creation, provide for the needs of modern business, increase the attractiveness of the District as a business location, and support the economic development of the coastal market area'

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20	Employment and Enterprise	Policy EMP SP2 deals with the Economic Growth Areas (EGAs). That part of the policy relating to the Littlehampton EGA seems to focus almost entirely on the harbour area whereas the EGA encompasses a much larger area including the town centre. Moreover, the explanation to the policy (8.5.7 – 8.5.16) covers a wider range of regeneration issues. Should the policy wording be expanded or are the issues dealt with adequately elsewhere (MM)? I note that the provisions of Policy EMP DM4 have been incorporated into Policy EMP SP2. That said the reference to eastward expansion as shown on the Policies Map is not included. Should this be retained within the policy as it is still shown on Policies Map 3 (MM)? The wording of the 2 nd sentence in paragraph 8.5.14 is a little awkward (AM).	Littlehampton town centre is covered in Policy RET SP1 and its supporting text but it is agreed that the policy wording could be expanded for clarity on the area that the EGA encompasses. The reference to the eastward expansion is not included in the policy because it has planning permission and is currently being built. The Council will delete the university eastward expansion from Policies Map 3.	MM13 & 14/AM30	<u>The EGA includes the Harbour (East and West Bank), Town Centre, industrial estates, part of the beach front, surrounding housing and a Strategic Housing Allocation at West Bank.</u> Development will be AM: 8.5.14 delete the second sentence. MM: The reference to the eastward expansion is not included in the policy because it has planning permission and is currently being built. Delete the university eastward expansion from Policies Map 3.
21	Employment and Enterprise	There is a missing word in paragraph 8.6.7 ('planning permission for development') and a typo in paragraph 8.6.8 ('surface'). Paragraph 8.6.16 repeats what is said earlier about Littlehampton Harbour, particularly in paragraphs 8.5.10 and 8.5.12 (AM). In that the EGA does not include any strategic employment land allocations it does not need to be referred to here. Paragraphs 8.6.20 and 8.6.21 do not relate to Angmering so should have a separate sub-heading (AM).	Corrections are noted and other issues are addressed as AM.	AM31	Corrections are proposed as AM. Delete paragraph 8.6.16. Insert a new heading 'Local Development Orders' before paragraph 8.6.20 and 'Strategic Employment Land Allocations' before paragraph 8.6.21
22	Employment and Enterprise	In relation to the strategic employment land allocations set out in Policy EMP SP3 some high-level criteria are provided within the policy (a. to e.) and Enterprise Bognor Regis (EBR) benefits from a separate policy (EMP DM2) with more detailed criteria. The sites at Greater Littlehampton already have planning permission. In relation to Angmering and Site 7 paragraphs 8.6.17 to 8.6.19 set out some considerations that would need to be taken into account in bringing the site forward. However, these do not appear to be translated into policy. Should criteria be included within Policy EMP SP3 to guide development at Site 7 or do other policies of the LP provide sufficient control (MM)?	ADC note the observation and agree that further clarity is needed. An amendment to Policy EMP SP3 will be drafted alongside the Statement of Common Ground between ADC and the promoters for this allocation.	MM15	MM will be drafted following further investigation and set out in SoCG for Angmering allocations.
23	Employment and Enterprise	The last sentence of paragraph 8.7.4 refers to the NPPF but seems to be out of context with the rest of the section and the evidence base which emphasise the need to retain employment sites. In relation to Arun there appear to be strong economic reasons why redevelopment of employment sites for other uses would be inappropriate unless the criteria within section 2 of Policy EMP DM1 are met. In these respects the sentence should be deleted (AM).	The Council acknowledges this and is proposing an additional modification accordingly.	AM32	Delete the last sentence of paragraph 8.7.4
24	Employment and Enterprise	There are typos in paragraph 8.7.5 ('the Council will requires' and 'An assessment will need, but....') (AM).	The Council acknowledges this and is proposing an additional modification accordingly.	AM33	Amend paragraph 8.7.5 to address issues see full text in Additional Modifications table.

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25	Employment and Enterprise	In relation to Policy EMP DM1 itself the use of the words ' <u>reasonable prospect</u> ' rather than 'good prospect' would be more consistent with paragraph 22 of the NPPF (AM). In section 4 of the policy 'Office Development' the wording, particularly the reference to 'retail policies' is confusing. Would the following be clearer? ' <i>The Council will seek to direct office development to the town centres. Enterprise Bognor Regis will also be considered as a suitable location for office development in accordance with Policy EMP DM2.</i> ' (MM)	The Council acknowledges this and is proposing modifications accordingly.	MM16/AM34	In relation to Policy EMP DM1 itself the use of the words 'reasonable prospect' rather than 'good prospect'. Amend section 4 of the policy as suggested.
26	Employment and Enterprise	Policy EMP DM2 in dealing with EBR sets out a number of criteria to govern its development. I note that in the Council's earlier statement relating to this issue reference was made to the valued tourism asset of Rowan Park Caravan Site. Should the policy include a criteria relating to its relocation? In relation to non B-class employment uses I assume that this would entail ancillary retailing, food and drink and facilities such as day nurseries/crèche. That said paragraph 8.8.4 implies that larger scale retailing has been permitted. Does the wording of the policy provide sufficient safeguards to control significant out-of-centre retail development? Following on from Policy EMP DM1 and the fact that offices fall within the definition of 'main town centre uses' is there any need to limit the amount of office floorspace at EBR or would this be too prescriptive? Finally should this policy (or Policy EMP SP3) make reference to strategic employment land allocations being defined on the Policies Maps? (MM)	ADC agree and accept that main modifications will be required. The MM text will be informed by the Retail and Employment evidence in discussion with relevant ADC consultants. MM will be drafted and available no later than the deadline for the relevant Hearing Statements.	MM17	MM will be drafted and provided in due course as part of Hearing Statements.
27	Employment and Enterprise	The phasing and site areas/gross floorspace/indicative use classes in Tables 8.1 and 8.2 are presented as if they are policies but are separate from Policy EMP DM2 itself. If they are to have policy status they should be merged with EMP DM2 (MM).	Figures and information in the supporting text about site areas/floorspace/indicative use classes will be merged into policy EMP DM2	MM18	Update policy EMP DM2 with up to date site areas/floorspace/indicative use classes.
28	Employment and Enterprise	Within Policy TEL DM1 there is repetition in relation to ICNIRP requirements (criteria l. and m. and the paragraph after n.) (AM).	The Council acknowledges this and is proposing an additional modification accordingly.	AM35	Amend the policy as suggested. See full text in Main Modifications table.
29	Employment and Enterprise	The LP proposes significant strategic employment land allocations and also seeks employment land as part of strategic housing developments. Based on the evidence (see paragraph 11 above) it would appear unlikely that additional employment land allocations would be required during the LP period. Moreover, if circumstances change as set out in paragraph 8.13.1 it is likely that a review or partial review of the LP will be necessary rather than an employment land allocation DPD. In this respect does paragraph 8.13.1 need to be amended (AM)?	ADC agree with the comment that a review or partial review of the LP would be more appropriate under the circumstances, and therefore an AM is proposed accordingly	AM36	Text in paragraph 8.13.1 to be amended. The following text ' <i>Development Plan Documents will be prepared for any new employment allocation. In addition,</i> ' to be deleted from the paragraph. New sentence to be added to the start of paragraph 8.13.2 to state ' <i>The Council will undertake a review or partial review of the Local Plan if evidence and monitoring suggests that significant amendments will be required to the Local Plan employment land allocations, either in terms of the need for additional allocations to be identified, or existing allocations to be removed from the Plan</i> '.
30	Retail	In response to Issue 3.6 the Council had previously said that 'Local Service Centres' were the equivalent of 'District Centres' and that additional wording would be added to paragraph 9.1.5 to explain this. This has been omitted. The final sentence of paragraph 9.1.5 relates to paragraph 9.1.6. as it refers to village and suburban centres (AM).	Insert additional wording into para 9.1.5 to clarify that Local Service Centres are equivalent to District Centres. Delete the last sentence from para 9.1.5. Introduce new sentence into para 9.1.6 to clarify that suburban and village centres are equivalent to local centres.	AM37	Amend paragraph 9.1.5. "Arundel also includes the medium sized centres of Arundel and Rustington which are Local Service Centres (the equivalent of District Centres in NPPF terms). Arundel has a , leisure and community facilities. Village and Suburban Centres are the equivalent of local centres in NPPF terms. " Amend the first sentence of para 9.1.6 to read "In addition, there are a number of smaller suburban and village locations (the equivalent of local centres in NPPF terms)."

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31	Retail	Policy RET SP1 refers to the hierarchy of town centres. Whilst noting the explanation provided above, the Arun Retail Study (PEPP4) and the previous Inspector indicated it would be preferable to stick with the definitions in the NPPF. In addition the policy title should be 'Hierarchy of town centres'. I note that those centres which are defined as 'Village and Suburban Centres' are now listed in paragraph 9.1.6. In setting out a retail hierarchy the centres would be specifically named within the policy rather than the explanation. In addition do all these centres fall with the definition of 'Local Centres' or are they small parades of shops of purely neighbourhood significance? Finally the lowest tier do not have centre boundaries defined although the NPPF and Retail Study (paragraph 9.24) indicates that the LP should do so. (MM)	ADC will review and provide proposed main modifications to ensure that the policy clearly defines the 'Village and Suburban Centres' and ensuring that each of these centres falls within the definition of a 'local centre', with centre boundaries defined as required.	MM19	MM proposed to amend title of policy to 'Hierarchy of town centres'. Further proposed main modifications to be provided in due course to ensure that the policy itself clearly defines the 'Village and Suburban Centres' ensuring that each of these centres falls within the definition of a 'local centre', with centre boundaries defined as required.
32	Retail	The explanation to Policy RET DM1 refers to impact assessments being required for developments above 1000 sq m for the larger centres and 200 sq m for the lowest tier centres. I note the justification for these in the Retail Study and the Statement on Matter 3. These provisions would have more force if they were included within the policy itself (Section 3). The policy would be more effective and consistent with national policy if it referred to 'town centre uses' rather than 'retail development' in Sections 1, 2 and 3 (other than where referring to primary and secondary shopping frontages). In Section 2 there does not appear to be a policy distinction between primary and secondary shopping frontages. Section 3 would be more robust if it started with a phrase such as ' <i>Town centre uses should be accommodated in town centres. Proposals for town centre uses outside the centres defined on the Policies Map will only be permitted if.. etc.</i> '. Section 4 would be more robust if centre boundaries were defined. If so it could not permit the loss of shops unless certain criteria are met (as set out in the section). (MM)	ADC acknowledges this and is proposing modifications to address the points raised.	MM20	Amend RET DM1 sections 1,2 and 3 - ' <u><i>town centre uses</i></u> ' and ' <u><i>retail development</i></u> ' Start Section 3 as..... <u><i>'Town centre uses should be accommodated in town centres. Proposals for town centre uses outside the centres defined on the Policies Map will only be permitted if.. etc.'</i></u>
33	Tourism	33. Policy TOU SP1 is commendable in its objectives but does not have a strong land-use component. If a strategic policy for tourism is to be retained it should have more of a land use component (MM).	ADC acknowledge this and will provide proposed modifications with the Matters Statement-	MM21	MM will be drafted following advice from ADC consultants.
34 part 1	Tourism	Policy TOU DM1 is rather long and convoluted. It would be a better tool for the decision maker if it were to be broken up. For example the <u>1st section</u> could say something like: 'Proposals for development, including expansion, which are likely to attract visitors (such as leisure or cultural facilities) will be supported provided that they: a. are in accessible locations; b. are accompanied by workable and realistic travel plans; c. address visitor management issues; and, d. achieve good design. Larger scale proposals will generally be directed towards the Economic Growth Areas of Littlehampton and Bognor Regis. Smaller scale development may be suitable in other areas of the District including Arundel provided that other Local Plan policies are complied with.	ADC acknowledge this and propose main modifications accordingly.	MM22	Amend the policy as suggested. See full text in Main Modifications table.

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34 Part 2	Tourism	<p>The <u>2nd section</u> is presumably dealing with the loss of visitor attractions although the 3rd line does not make this clear. Again this part of the policy would be clearer if expressed along the following lines:</p> <p>Existing visitor attractions, facilities and accommodation (except holiday caravan sites) will not be granted planning permission for a change of use that leads to the loss of a visitor offer unless it is demonstrated that the use is no longer required and the site is unlikely to be reused or redeveloped for visitor purposes. To demonstrate these requirements the Council will require:</p> <p>a. evidence of marketing actively conducted for a reasonable period of time;</p> <p>b. that alternative visitor uses have been fully explored;</p> <p>c. an appraisal indicating that the use is no longer viable;</p> <p>d. evidence that the site has not been made deliberately unviable; and,</p> <p>e. evidence of the suitability of the site to accommodate the alternative use.'</p> <p>The 1st paragraph of Part b. is not policy but explanation for the policy and would be best incorporated after paragraph 10.1.1. (MM)</p>	ADC acknowledge this and propose main modifications accordingly.	MM23	Amend the policy as suggested. See full text in Main Modifications table.
35	Soils, horticultural and equine developments	In relation to Policy HOR DM1 that part relating to the redevelopment of horticultural sites for other purposes would presumably subject to Policy C SP1 and therefore only certain alternative uses would be acceptable. If this is the case the policy should make it clear (MM) .	ADC acknowledge this and propose main modifications accordingly.	MM24	In the penultimate paragraph amend the first couple of sentences as follows: will be considered on a case by case basis <u>against Policy C SP1.</u> <u>To reduce the impact on the sector, Applicants/Landowners</u>
36	Soils, horticultural and equine developments	36. The final two criteria of Policy EQU DM1 (g. and h.) appear onerous given that much equine development will be small scale. If the proposal has demonstrated that it is acceptable against criteria a. to f. then the site is presumably a reasonable option. With regard to h. equine use implies that the land will continue to be open and 'green'. (MM)	ADC acknowledge this and propose main modifications accordingly.	MM25	In Policy EQU DM1, requirements g and h be deleted
37	Housing Delivery	Paragraph 12.1.15 is not very clearly expressed and would benefit from rewording (AM) . The housing trajectory referred to in paragraph 12.1.16 appears to be shown in Picture 12.1 on page 137 and not in an appendix (AM) .	The Council acknowledges this and is proposing additional modifications accordingly.	AM38 &39	Re-word paragraph 12.1.15 and amend reference to picture 12.1

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38	Housing Delivery	It would seem more logical if Policy H SP1 followed the section on OAN (12.1.1 to 12.1.4) and then the section on housing supply followed Policy H SP1 (AM). In terms of housing supply and its components set out in Table 12.1, an allowance of 1,250 dwellings is made for non-strategic sites to be identified through Neighbourhood Plans or a Small Site Allocations DPD. What is the basis for this figure given that it is assumed that the sites have not yet been identified? Can such sites reasonably be included in the supply figures?	It is considered that the policy should not be relocated as suggested. The reason for this approach is that the text prior to the policy is there by way of explanation. The Councils HELAA identifies a number of deliverable and developable sites, demonstrating that the allowance for 1,250 dwellings is reasonable. The Council is working with Town and Parish Councils to ensure that the figure can be delivered either through revisions to Neighbourhood Plans or a separate DPD. Section 3 of the Housing Implementation Strategy (PELVP22) sets out that the delivery of the Non-Strategic Sites allocation is anticipated to be phased towards the end of the Plan period in order to enable existing Neighbourhood Plans to be reviewed or new Neighbourhood Plans to be produced in areas without an existing Plan. This will also give the Council time to produce a Small Site Allocations DPD if it is required to identify any remaining sites to meet the requirement.	No change	No change
39	Housing Delivery	The overall supply in Table 12.1 shows 20,074 dwellings according to my calculations. This figure should be included at the bottom of the table (AM). Comparing this figure to the housing requirement of 20,000 there is very little flexibility (less than 0.5%). What provisions, if any, can be incorporated into the LP to increase flexibility?	ADC propose to produce a final delivery figure and update the HIS and HEELA.	AM40	Include the total figure of 20,074 at the bottom of table 12.1
40	Housing Delivery	The March 2017 Housing Implementation Strategy (HIS) (PELVP22) sets out the Council's approach and the justification for a stepped delivery which would, according to Table 9 in the HIS, result in a 5 year supply of housing land for the period 2016-2021. Would it be possible to provide an update on housing land supply (HLS) so by the time of the hearings there is information on the HLS position at 31 March 2017?	The Council is working to collate this information and will provide the required update prior to the examination hearings	NA	Provide the Inspector with the latest HLS position
41	Housing Delivery	Policy H SP1 sets out the housing requirement rather than a 'housing allocation' and its title should reflect this. In addition the requirement should be expressed as a minimum. Furthermore the LP is not making provision for all the new homes. In these respects the policy would be better expressed as ' <i>Within the plan period 2011-2031 at least 20,000 new homes will be accommodated in the District. Delivery will be phased over the plan period as follows.</i> ' Should the years within the table reflect the periods that HLS figures are collected e.g. 2011/12 to 2015/16, 2016/17 to 2020/21? (MM)	ADC agree and will propose main modifications accordingly.	MM26	Amend the policy as suggested. See full text in Main Modifications table.

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42	Housing Delivery	In relation to the housing strategy Table 12.3 sets out the strategic allocations but these ought to be incorporated into Policy H SP2 (as with Policy EMP SP3 for the strategic employment allocations). The policy would start by saying something like: ' <i>The following strategic housing sites are allocated as shown on the Policies Maps</i> (followed by the list of sites and the no of dwellings). At the end of the policy reference is made to 'the principles of the Garden City movement'. It is not clear where the justification for this requirement was derived from and whether, without further explanation, it would be an effective component of the policy. Such principles are not mentioned elsewhere in the LP. (MM)	ADC agree and will propose main modifications accordingly.	MM27	Insert the strategic allocations into policy H SP2. Remove references to 'the principles of the Garden City movement'
43	Housing Delivery	Policy H SP2a in dealing with strategic allocations in Bognor Regis should have regard to paragraph 8.5.24 of the LP and the need for developments to link into the town centre. Assuming that this is deliverable the policy should include relevant criteria. The West of Bersted allocation includes a requirement for new employment provision. Should the amount that ought to be provided be quantified? Should the policy include provisions relating to the phasing of employment land alongside the housing? On a similar theme is there an intention to include employment development within the West Bank allocation (Policy H SP2b) or would it be limited to businesses around the harbour as identified by Policy EMP SP2? (MM)	ADC acknowledges this and considers that specific reference should be made to the need for development to link into the town centre to support regeneration initiatives, and proposes a MM accordingly. Employment provision will be dealt with as part of a strategic masterplan. There is no intention to include employment provision in the West Bank - employment provision is linked to the wider EGA	MM28	Add new criteria h to Policy H SP2a under 'Pagham' to state ' <u>ensure linkages and accessible pedestrian and cycle routes to the town centre where possible to enhance sustainability and town centre regeneration initiatives</u> '. Also add the same text as new criteria i to the Policy under 'West of Bersted'.
44	Housing Delivery	The Barnham/Eastergate/Westergate (BEW) and Ford allocations (SD5 and SD8) include requirements for new employment provision. Should the amount that ought to be provided be quantified? Should Policy H SP2c include provisions relating to the phasing of employment land alongside the housing? The requirement for the provision of a new secondary school is set out in Policy INF SP2 and paragraph 12.1.17. However, delivery would be more certain if Policy H SP2 included a requirement that land be provided linked to one or more of the allocations or through a separate section of the policy. The Angmering North allocation (SD9) sits alongside the strategic employment site (Site 7). Is there merit in linking the two elements with a phasing requirement so that the employment development is delivered alongside housing? (MM)	Employment provision will be dealt with as part of a strategic masterplan. Additional work is being undertaken with WSCC and the relevant site promoters with respect to the Secondary School. A modification will be proposed in due course to Policy H SP2 to provide greater certainty The suggestion regarding SD9 and the employment allocation is being considered, and a proposed MM will be provided if necessary in due course.	No change	No change for the time being
45	Housing Delivery	In relation to housing mix Policy H DM1 refers to the most up to date Strategic Housing Market Assessment (SHMA). I note that the most recent report (PELVP23) referred in Table 29 to the broad mix of housing that is required. In accordance with paragraph 50 of the NPPF would Policy H DM1 be more effective if specific figures were included? I note that Policy AH SP2 does this for affordable housing. Policy H DM1 also includes reference to tenure mix but this is more relevant to affordable housing and is dealt with by Policy AH SP2. (MM) Policy H DM2 deals with accommodation for older people. However, there is no requirement within Policy H DM1 for the mix to include specialist housing for older people notwithstanding a need identified as 2,257 units[3]. Should such a provision be included? (MM) The Lifetime Homes standard has been replaced so should not be referred to here or elsewhere in the LP (AM) .	ADC agree and will propose main modifications accordingly.	MM29 & 30/AM41	Policy H DM1 include housing mix figures from the SHMA as well as a requirement for specialist housing for older people (as two MM's). Correct the reference to Lifetime homes (AM).
46	Housing Delivery	Paragraph 12.3.8 refers to the Code for Sustainable Homes. The reference should be deleted. From my reading of the Local Plan Viability Assessment Update (PELVP21) green field sites should be viable with 30% affordable housing. Paragraph 12.3.9 seems to contradict the report and the requirements of Policy AH SP2 and would be best excluded. (AM)	ADC agree and will propose additional modifications accordingly.	AM42	The reference to the Code for Sustainable Homes in paragraph 12.3.8 will be deleted. Paragraph 12.3.9 reworded as an AM.

Insp-Para	Section	Inspector Comment	ADC Response	Change IMM or IAM	Suggested Change
47	Housing Delivery	Policy AH SP2 flags up the possibility that some developments may not be viable with 30% affordable housing on site. Should the policy include a requirement that in such circumstances a viability assessment should be submitted to seek to justify provision under the policy target? (MM) The phrase 'non-viable option' is somewhat clumsy. The following would have more clarity: 'Where it can be proven that 30% affordable housing provision is not viable .' (AM)	ADC agree and will propose modifications accordingly.	MM31 and AM43	Make the suggested changes to the policy
48	Housing Delivery	It is assumed that Policy H SP3 would only come into play when the housing need cannot be met on allocated sites or within the Built-Up Area Boundary. I would suggest that this ought to be stated at the start of the policy (MM) . Criteria a. and c. within the 1 st section of Policy H SP3 involve some repetition and would benefit from being merged (AM) . In relation to the last sentence of the policy I am not clear what the reference to 'mixed use' means in the context of a traveller site.	ADC agree and will propose modifications accordingly.	MM32/AM44	Make the suggested changes to the policy
49	Housing Delivery	In paragraph 12.5.3 the full stop in the 2 nd line should be replaced with a comma (AM) . Policy H SP4 refers to 'over concentration' but does not seek to quantify this. Would the policy benefit from guidance on what would constitute over concentration? (MM) Houses in Multiple Occupation (HMOs) can provide valuable accommodation for students. Given that student numbers on the Bognor Regis campus are expected to rise should the requirements for accommodation be acknowledged by Policy H SP4 or another policy?	ADC agree and will propose modifications accordingly. The HMO policy will be amended as an MM.	MM33/AM45	Change punctuation AM. Amended wording for policy H SP4. See full text in Main Modifications table.
50	Housing Delivery	In terms of traveller accommodation is there any evidence that needs have changed since May 2015? For example have any temporary planning permissions been granted or have there been any unauthorised sites or illegal encampments? There is an indication that the updated Gypsy and Traveller Accommodation (GTAA) did not take into account planning permissions and refusals since 2013. Has this now been taken into account?	The most up to date information will be included in the Matters Statement	NA	This update and/or further information will be in the Matters Statement.
51	Housing Delivery	Policy H SP5 should be clear about the provision needed for gypsies and travellers. For example it could start by stating: 'Within the plan period 2011-2031 provision shall be made for at least 5 private pitches and 9 public pitches for gypsies and travellers and 7 plots for travelling showpeople in the District.' (MM)	Amend Policy HSP 5 to include this text at the start	MM34	Amend the policy as suggested. See full text in Main Modifications table.
52	Housing Delivery	Based on the current level of need for private pitches Policy H SP5 expects that provision will be made through planning application(s) considered against a number of criteria. Assuming that this is an appropriate way forward the policy should make this approach clear e.g. 'Provision for at least 5 private pitches will be made on unallocated sites permitted in accordance with the criteria in 3 below:' (MM)	ADC acknowledge this and propose a main modification accordingly.	MM35	Amend the policy as suggested. See full text in Main Modifications table.
53	Housing Delivery	In contrast the need for at least 4 public pitches will be met by a future allocation in a separate later DPD. Whilst noting criterion q. of Policy H SP2 given that the settled population's housing need is largely addressed through allocations is this an equitable approach? Having regard to the scale of the strategic allocations have no suitable sites been identified or put forward?	The provision of a public pitches on the strategic sites has been set in policy to H SP2 to enable ongoing negotiation about this possibility. The discussions with the allocated site promoters has been started and will be ongoing.	NA	Update through the Statements of Common Ground and the Matters Statements.

Insp-Para	Section	Inspector Comment	ADC Response	Change IMM or IAM	Suggested Change
54	Housing Delivery	Policy H DM3 includes a number of criteria against which to judge agricultural, forestry and horticultural workers' dwellings. Should the scope of the policy be extended to apply to 'rural workers' more generally as referred to in paragraph 55 of the NPPF? Should the criteria within section 2 also refer to the need being met by the conversion of existing buildings if they are available? (MM)	ADC acknowledge this and propose a main modification accordingly.	MM36	Amend the policy as suggested. See full text in Main Modifications table.
55	Housing Delivery	Section 4 of Policy H DM3 relates to a different subject matter than the remainder of the policy so ought to be a separate policy. In addition is this part of the policy consistent with paragraph 55 of the NPPF which does not have any requirement to demonstrate that attempts have been made to find a business use? Moreover its effectiveness has been eroded by the changes to permitted development rights which allow conversion of agricultural buildings to dwellings. (MM)	ADC acknowledge this and propose a main modification accordingly.	MM37	Amend the policy as suggested. See full text in Main Modifications table.
56	Design	The modification to the 1 st paragraph of Policy D SP1 reads a little awkwardly. I would suggest: ' <i>All development proposals must make efficient use of land and reflect the characteristics of the site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details.</i> ' (AM) .	ADC acknowledge this and propose an additional modification accordingly.	AM46	Amend the text as suggested.
57	Design	In Policy D DM1 Section 3 greater clarity would be achieved by avoiding repetition so I would suggest: ' <i>Have minimal impact to users and occupiers of nearby property and land. For example, by avoiding the significant loss of sunlight, privacy and outlook and unacceptable noise and disturbance.</i> ' In Section 6 the 'Safer Places' document has been cancelled. There is a 2016 edition of 'Secured By Design.' (AM)	ADC acknowledge this and propose additional modification to Policy D DM1 Section 3 to give greater clarity.	AM47	Amend the text as suggested.
58	Design	The NPPG requires that local planning authorities provide justification for internal space policies taking into account need, viability and timing[4]. On the assumption that Policy D DM2 is seeking the application of the Nationally Described Space Standard (NDSS) and they are not merely guidance where is the justification? In terms of the detail of the policy and assuming that it is justified the phrase 'but development will be encouraged to make the most efficient use of land' seems to dilute the effectiveness of the policy and the reason for the phrase is not clear from the explanation to the policy. In these respects consideration should be given to its deletion (MM). In contrast the exceptions to the application of the NDSS set out in paragraph 13.3.5 are not included in the policy. Also references in the policy and explanation should be to the NDSS not 'Nationally Described Standard' (AM).	ADC acknowledge this and propose modifications accordingly	MM38 / AM48	Amend the policy as suggested. See MM table for detailed wording.
59	Design	Paragraph 13.3.9 indicates that further work is being undertaken to establish private open space standards for the District but Policy D DM3 is fairly prescriptive in its requirements. If further work is to be undertaken would it be preferable to delete the policy and incorporate guidance in the emerging Design Guide Supplementary Planning Document (SPD)? (MM)	ADC acknowledge this and propose modifications accordingly.	MM39	Delete Policy D DM3 and supporting text.
60	Design	In relation to Policy ECC DM1, there is reference to protected or sensitive landscapes. Other than the area protected by Policy LAN DM2 (the setting of Arundel) and those parts of the District close to the SDNP are there any other 'protected' landscapes? The policy should perhaps be specific in referring to the particular areas (MM) .	The policy will protect the defined protected landscapes but not these additional sensitive landscapes	MM40	Amend the policy to clarify that the protected landscapes are only protected.

Insp-Para	Section	Inspector Comment	ADC Response	Change IMM or IAM	Suggested Change
61	Health, Recreation and Leisure	The 1 st part of Policy OSR DM1 and that part of the 3 rd section that relates to indoor sport repeats paragraph 74 of the NPPF. In this respect why is it needed?	ADC acknowledge this and propose an additional modification accordingly.	AM49	Combine and reword parts 1 and 3 as an AM
62	Health, Recreation and Leisure	The 2 nd part of the policy includes a list of possible contributions that could be sought from developments. Is the policy sufficiently clear as to the level of contribution that would be required from particular forms of development in different locations? For example should the requirements for open space set out in the table on page 25 of the Open Space Study of September 2016 (PELVP29) be included within the policy? Can the need for playing pitches and indoor sports and leisure facilities set out in PELVP25 and PELVP27 be translated into clear requirements for developers, other than those strategic allocations where specific provision is included? Is the requirement for a new leisure centre in the west of the District justified and which developments (location/scale) will be expected to contribute? Should one of the strategic allocations incorporate the requirement for a new leisure centre?	ADC acknowledge this, but consider that the details of contributions required should be set out in an SPD as referenced in paragraph 14.1.21. The SPD will need to take into account the evidence available and the up to date planning status of Strategic Site Allocations, particularly where planning applications have already been submitted. Page 11-13 of the Indoor Sport and Leisure Facilities Strategy (PELVP25) gives justification for the new leisure centre which will not be required to be located in an allocated site.	MM41	Amend the 2nd part of the policy. Final wording to be advised in the matters statement and statement of common ground.
63	Health, Recreation and Leisure	Section 5 of Policy OSR DM1 repeats paragraph 76 of the NPPF. I would suggest that all this section needs to say is that ' <i>Local Green Space is not identified in this LP but will be designated in Neighbourhood Plans in circumstances where the criteria in paragraph 77 of the NPPF are met.</i> '	ADC acknowledge this and propose an additional modification accordingly.	AM50	Amend the text as suggested.
64	Health, Recreation and Leisure	In relation to allotments is there scope for some of the larger housing allocations such as SD3, SD5 and SD8 to include provision for allotments? Otherwise it would seem unlikely that allotment sites will be developed.	ADC acknowledge this. However, policy H SP2 criteria O can be used to negotiate for such facilities to be delivered on the strategic sites. On-going negotiations and/or planning applications are seeking allotments and other infrastructure.	NA	Update on progress will be provided in the Hearings statement and in Statements of Common Ground in respect of Strategic Site Allocations. See also ADC table of current status on allocated sites.
65	Transport	It is noted that further work is being undertaken in relation to transport impacts of developments in Arun and Chichester Districts. The completed study will inform the later stages of the examination.	Additional work is underway and preliminary findings will be available in August with final recommendations and agreement about these programmed for September before the hearings.	NA	Update progress of the further studies and set out position in the matters statement and Memorandum of Understanding.
66	Transport	In relation to Highways England (HE) and the CC it is noted that the Position Statement attached to Statement ADC/Doc1/Matter 6 referred to a Statement of Common Ground (SOCG) being drawn up between the District Council, CC and HE. Presumably this will not be agreed until such time as the further work referred to above is concluded and the implications considered.	Refer to answer to 65 to 66 against 65.	NA	Refer to answer to 65 to 66 against 65.
67	Transport	In view of the above and the detail within Statement ADC/Doc1/Matter 6 (some of which will require updating) I will not raise questions on transport and in particular highway improvement schemes at this stage other than in relation to some detailed points.	Refer to answer to 65 to 66 against 65.	NA	Refer to answer to 65 to 66 against 65.
68	Transport	The new sentence inserted in paragraph 15.1.2 of the LP appears to be misplaced. In view of the loss of the Arundel by-pass amendments will be needed to the text in various places e.g. 15.1.3 and 15.3.6 to 15.3.8 and Policy T SP3 m. (AM).	Refer to answer to 65 to 66 against 65. Note that the Chichester Bypass was cancelled, the Arundel Bypass remains as a Major Scheme planned for 2020.	NA	Refer to answer to 65 to 66 against 65.
69	Transport	Parts of Policy T SP2 are explanation rather than policy e.g. the 2 nd sentence of the 1 st paragraph which is covered by paragraph 15.2.11. It is noted from paragraph 22.0.12 that a variety of funding measures would be sought. However, it is not clear to me from my reading of the updated Infrastructure Delivery Plan (IDP) (PEDP4) how the Littlehampton to Arundel Green Link would be supported.	ADC acknowledge this and propose an additional modification accordingly.	AM51	Reword the part of Policy T SP2.

Insp-Para	Section	Inspector Comment	ADC Response	Change IMM or IAM	Suggested Change
70	Transport	Whilst paragraph 40 of the NPPF refers to parking charges I am not convinced that it is a matter that should be incorporated into a land use planning policy. More it is guidance for Local Authorities at a corporate level (note that it does not refer to 'Local Planning Authorities'). Moreover, the relevant part of Policy T DM2 just repeats the NPPF. For these reasons I would exclude this part of the policy (AM) .	ADC acknowledge this and propose an additional modification accordingly.	AM52	Delete the part of Policy T DM2 referring to parking charges AM.
71	Building Conservation and Archaeological Heritage	The tests within strategic Policy HER SP1 appear to be more onerous than those contained within the NPPF where at paragraphs 132, 133, 134 and 135 in particular harm is weighed against public benefits. For example in relation to 'locally listed buildings' and 'Areas of Special Character' (non-designated heritage assets) the character <u>must be preserved</u> . Development adversely affecting a Conservation Area will only be permitted in <u>exceptional circumstances</u> . Total or substantial, demolition of a listed building will only be permitted in <u>wholly exceptional circumstances</u> (this test only applies to heritage assets of the highest significance). These tests set a high bar and thought should be given to ways the wording could be more balanced whilst not undermining the need to recognise that heritage assets are an irreplaceable resource. (MM)	The policy is an overarching policy which is supplemented by the individual policies.	MM42	Amend text to offer a more balanced view, whilst not undermining the need to recognise that heritage assets are an irreplaceable resource. See full text in Main Modifications table.
72	Building Conservation and Archaeological Heritage	Paragraphs 16.2.13 and 16.2.14 which refer to protected species are not relevant to the chapter issue. The point that protected species may be present applies to many buildings and sites and not just those that are heritage assets. It would be best dealt with by adding any necessary text to paragraphs 17.4.2 and 17.4.3 within Chapter 17 (Natural Environment). (AM)	ADC acknowledge this and propose an additional modification accordingly.	AM53	Amend the text as suggested.
73	Building Conservation and Archaeological Heritage	In relation to enabling development the criteria set out in paragraph are presumably derived from Historic England advice e.g. 'Enabling Development and the Conservation of Significant Places'. Should these criteria form part of Policy HER DM1 rather than explanation to the policy? Should a criterion relating to the mechanisms that would ensure the conservation of the heritage asset be included? (MM)	ADC agree and accept the suggested modification as an MM.	MM43	Amend the text as suggested. See MM table for detailed wording.
74	Building Conservation and Archaeological Heritage	The reference in paragraph 16.3.4 that special importance will be attached to Locally Listed Buildings seems to be applying a significance that matches that of designated heritage assets. Is this reasonable? Should the references to 'special' within the paragraph be removed? (AM)	ADC acknowledge this and propose an additional modification accordingly.	AM54	Remove the word 'special' from the first sentence of paragraph 16.3.4
75	Building Conservation and Archaeological Heritage	In Policy HER DM2 'Locally Listed Buildings' should be referred to in the 3 rd paragraph not just 'Buildings'. Should this part of the policy refer to circumstances where the benefits of redevelopment might outweigh the loss? (MM)	ADC acknowledge this and propose a main modification accordingly. The comment related to the benefits of redevelopment are noted.	MM44	Refer to 'Locally Listed Buildings' in the 3rd paragraph. Include an additional reference to circumstances where the benefits of development might outweigh their loss. Insert additional text: 'There may be circumstances where the public benefit from the proposed development outweighs any proposed harm. in such circumstances, the proposal will need to be justified by the applicant'
76	Building Conservation and Archaeological Heritage	On a similar point to that raised in paragraph 74 should 'Areas of Special Character' covered by Policy HER DM4 be named as such given that Conservation Areas are designated because of their 'special interest'? Would 'Areas of Character' be a better term? (MM)	Areas of Special Character were named and identified a number of years ago. The intention is that the council has identified local areas of special character which it wishes to protect from inappropriate development. Accept that the name change could provide distinction from Conservation Areas.	MM45	Rename Policy HER DM4 to areas of character.

Insp-Para	Section	Inspector Comment	ADC Response	Change IMM or IAM	Suggested Change
77	Natural Environment	The reference to the SDNP at paragraph 17.1.11 should focus on the conservation of wildlife given that 7.5.3 and 7.5.4 deal with landscape and the SDNP. Reference to cultural heritage should be in Chapter 16. (AM)	ADC acknowledge this and propose an additional modification accordingly.	AM55	...The SDNP has two statutory purpose is: to conserve and enhance the natural beauty, and wildlife and cultural heritage ; and to promote opportunities for the understanding and enjoyment of the <u>its</u> special qualities of National Parks by the public.
78	Natural Environment	Although Section b. of Policy ENV DM1 refers to different levels of designation to my mind Section a. does not provide sufficient distinction between the hierarchy of wildlife sites referred to in paragraph 113 of the NPPF. (MM)	Point a of the policy was originally intended to relate to international sites only which reflects the required test set down. However, a change is suggested to further reflect this within the wording of the policy	MM46	Insert the following between the first two sentences of the first paragraph of the policy as presented: "...(either individually or in combination with other developments), will not normally be permitted. <u>Consideration will be taken to the exact designated features present on the site, their scarcity/rarity and recognition of the protection offered by their existing status.</u> Exception will only be made <u>for those with the highest value</u> where the following can be demonstrated..."
79	Natural Environment	Although Policy ENV DM2 refers to the provision of new green spaces alongside new development within Zone B this is not picked up in the explanation to the policy at 17.1.22 (AM) . What are the implications of the pooling restrictions within the Community Infrastructure Levy (CIL) Regulations on infrastructure contributions for the effectiveness of Section b. ii. of the policy?	Insertion of additional phrase at beginning of MC252 and new sentence to follow bullet points. As the access management measures identified do not include the allocation of specific land, meaning they are not classified as physical infrastructure and so the definition of infrastructure set out in Section 216 of the Planning Act 2008, so the pooling restrictions of Regulation 123 of the CIL Regulations. It is compliant with the test under Regulation 122 of the CIL Regulations, as a contribution is required to make the development acceptable in planning terms The mention of developer contributions in bullet ii. of this policy was also intended to cover windfall sites, where it was not possible to deliver something on site. If it is felt that this would still be onerous then a main modification to this bullet is suggested	AM56/MM47	...and future pressure on Pagham Harbour <u>from recreational disturbance</u> identified in the Appropriate Assessment <u>Though it is recognised that the special draw of the coast cannot be fully removed, this may be reduced through the addition of design aspects, such as on-site green space or dog walking areas.</u> MM: To remove any need for physical infrastructure to be a direct requirement of this policy, it is further suggested that the following is deleted from bullet ii. of ENV DM2, to read as follows: "within or adjacent to the development site, or to make developer contributions towards the provision of such green space to serve the area. These shall be..."
80	Natural Environment	As the little Ramshorn whirlpool snail is not waterfowl the 1 st sentence of paragraph 17.1.24 will need amending (AM) .	This change has already been put forward in response to MM representation to Chapter 17 so MC253 will be moved from this paragraph to the next as advised by Natural England, so they are both factually correct	AM57	MC 253 be removed from 17.1.24 and inserted into 17.1.25 as: "...hydrological unit. <u>The site is designated due to the little Ramshorn whirlpool snail Anisus vorticulus.</u> Although the ..."
81	Natural Environment	Are there any implications arising from the Arun Valley Special Protection Area (SPA) for policies within the LP? For example the Habitats Regulations Assessment (HRA) of February 2017 (PELP33) refers to counteracting measures in relation to Berwick's swan. How have these measures been built into policies if at all?	The implications of there being functionally connected land from the Arun Valley SPA has been incorporated with the Main Modifications as point p of H SP2b (MM24), as well as the initial paragraph under the Ford heading in H SP2c (MM25). Further MC255 makes mention of the fact that there is functionally connected land within the area of this Local Plan, as well as acceptance within the Summary Sheet for Chapter 17 of a further sentence from Natural England to this paragraph.	AM58	For further clarity the suggested amendment is replicated here. Inclusion of the further sentence from Natural England: <u>Loss of habitat within these impact risk zones, which is regularly used by foraging Bewick's swans (ie is functionally linked to the SPA), could have a significant effect on the SPA, and will need assessment under the Habitats Regulations at the project level</u>

Insp-Para	Section	Inspector Comment	ADC Response	Change IMM or IAM	Suggested Change
82	Natural Environment	Policy ENV DM3 has not been amended as suggested within paragraph 8.5.2 of Statement ADC/Doc1/Matter 8 in response to issue 8.5 raised by the previous Inspector. It still starts with 'Within Biodiversity Opportunity Areas....' although it is noted that in the schedule of MMs the phrase has been omitted (MM57). As such the policy still focuses on Biodiversity Opportunity Areas rather than biodiversity generally. Should the policy be more all-embracing or is this achieved by Policy ENV DM5? An alternative would be to amend the title of Policy ENV DM3 to 'Biodiversity Opportunity Areas'. (AM)	This is an error, the wording should be as contained in MM57, otherwise there is repetition. As the focus of the policy is the BOAs, this should be renamed.	AM59	For clarity this should read: Biodiversity Opportunity Areas Within Biodiversity Opportunity Areas (BOAs) (see policies Map) Development shall: ...
83	Natural Environment	The drafting of Policy ENV DM4 would be improved with the insertion of 'development' before 'would' under criteria a. and b. (AM) .	ADC acknowledge this and propose an additional modification accordingly	AM60	Correct to read as: ...destroyed now and as they reach maturity, unless <u>development</u> : a. Would result ...
84	Natural Environment	In paragraph 18.2.14 the Building Regulations require new homes to meet the national standard of 125 litres per person per day not 105 as set out. Paragraph 18.2.15 refers to 80 litres/person/day whereas the optional requirement is 110. (AM)	Since drafting the optimal standards have changed but these were to help prevent pressure on abstraction points, which was 105 l/person/day internally and an additional 5 l/person/day for external use. Modifications proposed to reflect this.	MM48/AM61	AM: For clarity the end of the sentence in paragraph 18.2.14, be amended to read: "...new homes to reach an <u>optional</u> standard of" MM: And for consistency and clarity the policy wording be amended to: "...nature conservation. To ensure all new development of two dwellings or more are water efficient and reduce pressure on water abstractionsites, it must include measures that meet current the <u>optional water efficiency</u>
85	Natural Environment - Water	There is a typo in the 2 nd line of paragraph 18.1 (full stop instead of comma). (AM)	ADC acknowledge this and propose an additional modification accordingly	AM62	Amend to read:wider South East region; including
86	Natural Environment - Water	In terms of Policy W DM1 Section 1 refers to new development meeting current standards for water supply. However, this is controlled by the Building Regulations so it is not necessary to include it within the policy (AM) .	For the same point as 84 above, it was intended to reflect the change with respect to the Code for Sustainable Homes and prevent pressure on abstraction sites. To reflect this a further amendment is suggested to provide a more local specification.	AM63	Amend first paragraph to:include measures that meet the <u>optional</u> standards of <u>110 l/person/day</u> .
87	Natural Environment - Water	The NPPF Technical Guidance has been superseded by the NPPG (Policy W DM2). Some elements of the Exception Test are included within Policy W DM2 but not others. Should the policy refer to the need to pass the Exception Test as set out in national policy? (AM)	ADC note and suggest that for clarity and to reflect the full requirements relating to flood risk the following changes are inserted into Policy W DM2	MM49/AM64	MM: Additional point be inserted between b. and c. saying "The sustainability benefits to the wider community are clearly identified." AM: Plus the following alteration be made to the end of the 2nd paragraph "...as set out in the NPPF Technical Guidance under Flood Risk assessments: climate change allowances section of the NPPG." Plus insertion of the name of the new flood risk evidence in the first paragraph as follows: "...Risk Assessment (SFRA) <u>Update 2016</u> , will only..."
88	Natural Environment - Water	There is some repetition in paragraph 18.4.1 ('primary purpose' referred to twice) (AM) .	ADC acknowledge this and propose an additional modification accordingly	AM65	Suggest:for wildlife. Although their primary purpose is dealing with surface water, a resultant effect
89	Natural Environment - Water	In the last line of Policy W DM4 should the words 'and/or' be excluded (AM) ?	It was intended that this would cover all instances envisaged where only a local feature may be affected, an interest feature or both, due to the differences along the whole of the coastline.	NA	Note explanation from ADC.

Insp-Para	Section	Inspector Comment	ADC Response	Change IMM or IAM	Suggested Change
90	Waste Management	The 3 rd section of Policy WM DM1 indicates that major residential development needs to contribute to recycling and general waste bins through planning conditions. The requirements are not very specific and would such conditions meet the tests set out in the NPPG (MM)?	On rereading the policy and reconsidering the situation regarding conditions and remits of the Council, it is felt that this sentence be removed from the policy as the potential point being addressed is covered by point b. above.	MM50	Remove the 3rd paragraph of the policy as follows:residents of flats. All major residential development will be required to contribute towards the provision of recycling and general waste bins through planning conditions. In accordance.....
91	Quality of the environment	Paragraph 21.3.4 refers to the Green Infrastructure Network being protected from light pollution but this objective does not appear to have been translated into policy e.g. Policy QE DM2 or Policy GI SP1.	ADC acknowledge this and propose a main modification accordingly.	MM51	Amend policy as suggested. See full text in Main Modifications table.
92	Infrastructure	Statement ADC/Doc 1/Matter 8 indicated that further detail as to how S106 contributions will work will be required through the preparation of a planning obligations SPD. What is the timetable for such an SPD assuming that there is still an intention to produce one? Otherwise the contributions towards district wide infrastructure required by Policy INF SP1 are not very specific.	The IDP sets out what infrastructure needs to be provided, and how this will be provided - including where S106 contributions will be used, taking into account the CIL Regulations. ADC suggest a specific reference to the IDP within Policy INF SP1 which states that developments must contribute towards infrastructure requirements in accordance with the IDP wording to that affect.	MM52	Amendment to provide specific reference to the IDP within Policy INF SP1 - and state that developments must contribute towards infrastructure requirements in accordance with the IDP
93	Infrastructure	Paragraph 22.0.24 and Policy INF SP2 refers to broad locations for a new secondary school being shown on the Policies Map. I could not see such designation. Paragraph 44 of these questions refers to the possibility of linking the secondary school requirement with one of strategic housing allocations as inferred by paragraph 22.0.24 (MM).	Further work has been undertaken to identify a site for a secondary school which will be set out in the Matters and Issues Statement	MM53	MM: Update with latest area/site identified as a location for a new secondary school.
94	Monitoring Framework	There are references to the Technical Appendix: Monitoring Framework Appendix in this section but I assume that this has been replaced by the Framework which follows on from paragraph 23.0.15. Paragraph 23.0.11 refers to key indicators being set out at the end of each section but I assume that these are now incorporated into the aforementioned Framework. (AM).	The technical appendix has been replaced by the Framework	AM66	Formatting change to blend the monitoring sections together.
95	Monitoring Framework	The HIS indicates how the 5 year housing supply is to be measured applying the stepped trajectory of Policy H SP1, a 20% buffer brought forward from later in the LP period and the Liverpool method of addressing the shortfall. For the benefit of future decision makers these assumptions/parameters that are relied on to calculate the 5 year supply should be spelt out in the LP, either in the Monitoring Framework section or in the Housing Supply section. Some of these assumptions are included within paragraph 12.1.5 so it would be preferable to include it there. (MM)	ADC acknowledge this and propose a main modification accordingly.	MM54	Take wording from HIS for amendments to 12.1.5.
96	Monitoring Framework	I will reserve any comments on the targets, indicators and sources within the Monitoring Framework until it is clear if policies will be further modified during the remainder of the examination.	Noted	na	None required.
97	Glossary	The Code for Sustainable Homes can be removed from the Glossary. The reference to CABE should be changed to the Design Council. The definition of gypsies and travellers needs to be updated to take into account the revised definition in Planning Policy for Traveller Sites August 2015. (AM)	ADC acknowledge this and propose an additional modification accordingly	AM67	Amend as suggested see full text in Additional Modifications table.