

Type of Mod	Ref number	Chapter	Page of the ALP 2011-2031	Policy / Paragraph Number	Potential Modification (deleted text shown as struck through and additional text shown <u>underlined</u> .)	Reason for Modification
PostCMM	MM1	12	148	H SP2c (SD5) bullet point h	Addition to bullet h of H SP2c (SD5): "....and nursery places, subject to an assessment of local need...."	Representation received during the Main Modification Consultation Responding to BEW SLC comment ALPMods675
IMM	MM2	2	11	2.1	Add wording re: additional DPD's. " <u>...prepared by local communities. The Development Plan may include a Small Sites Development Plan Document (DPD) and Employment Allocations DPD depending on moitoring and will include a Gypsy and Traveller and Travelling Showpeople Sites Allocation DPD. Other local documents, including Supplementary Planning Documents and design guidance, will also form part of the Local Plan. These are set out in the Council's Local Development Scheme (LDS). The Plan sets out...</u> "	Response to Inspector query at paragraph 4 of Preliminary Questions letter
IMM	MM3	4	36	Strategic Objectives	Add reference to 'protecting and enhancing the setting of the South Downs National Park.' " <u>To protect and enhance Arun's outstanding landscape, countryside, coastline, historic, built and archaeological environment, as well as the setting of the South Downs National Park, thereby reinforcing local character and identity;</u> "	Response to Inspector query at paragraph 8 of Preliminary Questions letter
IMM	MM4	6	43	Policy SD SP1	Delete 2nd part to read as follows: "...coastal and inland). "Where there are no relevant policies in this Local Plan (and where relevant, with policies in Neighbourhood Development Plans) development proposed will be approved without delay unless material considerations indicate otherwise - taking into account whether: a. Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or b. Specific policies in that Framework indicate that development should be restricted. This presumption will...."	Response to Inspector query at paragraph 9 of Preliminary Questions letter
IMM	MM5	6	45	Policy SD SP1a	insert new criteria j about flood risk. " <u>....ensure that development, particulary in the undeveloped areas of the District, takes account of the coaslal topography to mitigate and adapt to climate change, especially in high risk flood areas</u> " and "k. Retain and enhance natural environmental resources, including biodiversity."	Response to Inspector query at paragraph 10 of Preliminary Questions letter and suggested in ADC - Matter 2 - Strategic - approach - final
IMM	MM6	6 or 8			Include reference to the amount of employment land in the policy.	Response to Inspector query at paragraph 11 of Preliminary Questions letter
IMM	MM7	7	48		Insert a new (second) bullet point: " <u>all strategic allocations as identified by the Local Plan</u> "	Response to Inspector query at paragraph 12 of Preliminary Questions letter
IMM	MM8	7	49		Amend paragrapgh 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."	Response to Inspector query at paragraph 12 of Preliminary Questions letter
IMM	MM9	7	50	Policy SD SP2	Amend first paragraph of SD SP2 and replace with: <u>"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."</u> Delete second paragraph " Permission will take into.... "	Response to Inspector query at paragraph 13 of Preliminary Questions letter

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IMM	MM10	7	51	Policy C SP1	Delete first paragraph and replace with: <u>"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..."</u>	Response to Inspector query at paragraph 14 of Preliminary Questions letter
IMM	MM11	7	55	Policy GI SP1	Delete final paragraph of GI SP1	Response to Inspector query at paragraph 16 of Preliminary Questions letter
IMM	MM12	8	74	Policy EMP SP1	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'	Response to Inspector query at paragraph 19 of Preliminary Questions letter
IMM	MM13	8	79	Policy EMP SP2	Insert the following in the first paragraph under Littlehampton Economic Growth Area: <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"	Response to Inspector query at paragraph 20 of Preliminary Questions letter
IMM	MM14	8		Policy Map 3?	Delete the university eastward expansion from Policies Map 3.	Response to Inspector query at paragraph 20 of Preliminary Questions letter
IMM	MM15	8	85	EMP SP3	<i>MM will be drafted following further investigation and set out in SoCG for Angmering allocations.</i>	Response to Inspector query at paragraph 22 of Preliminary Questions letter
IMM	MM16	8	81	EMP DM1	Replace existing paragraph under section 4 with the following: <u>"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."</u>	Response to Inspector query at paragraph 25 of Preliminary Questions letter
IMM	MM17	8	96	EMP DM2	<i>Policy EMP DM2 to be updated to reflect the current position in relation to the permitted and proposed uses of Enterprise Bognor Regis - to be completed</i>	Response to Inspector query at paragraph 26 of Preliminary Questions letter
IMM	MM18	8	96	EMP DM2	Include the site areas/gross floor space/indicative use classes in supporting text into policy EMP DM2	Response to Inspector query at paragraph 27 of Preliminary Questions letter
IMM	MM19	9	114-115		<i>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.</i>	Response to Inspector query at paragraph 31 of Preliminary Questions letter
IMM	MM20	9	114-115	RET DM1	Amend RET DM1 sections 1,2 and 3 - <u>'town centre uses' and 'retail development'</u> Start Section 3 as..... <u>'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'.</u>	Response to Inspector query at paragraph 32 of Preliminary Questions letter

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IMM	MM21	10	119	TOU SP1	MM will be drafted following advice from ADC consultants. Policy wording be changed as suggested in ADC- Matter 3a - Employment etc - COMPLETE-4 Sustainable tourism growth for Arun requires the protection of <u>features the coastal location, set below the backdrop of the South Downs National Park with the historic town of Arundel as its focal point</u> , that make the District attractive to visitors. Proposals for visitor related development will be determined by Arun's capacity to absorb such growth; for Arun this means tourism growth which:	Response to Inspector query at paragraph 33 of Preliminary Questions letter and provide a more spatial and land use component to provide additional policy guidance
IMM	MM22	10	120-121	TOU DM1	First paragraph of part a. be deleted and replaced with: "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.	Response to Inspector query at paragraph 34 of Preliminary Questions letter
IMM	MM23	10	120-121	TOU DM1	Reword TOU DM1 as follows; a. evidence of marketing actively conducted for a reasonable period of time; 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: b. that alternative visitor uses have been fully explored; c. an appraisal indicating that the use is no longer viable; d. evidence that the site has not been made deliberately unviable; and, e. evidence of the suitability of the site to accommodate the alternative use.' The 1st paragraph of Part b. will be incorporated after paragraph 10.1.1.	Response to Inspector query at paragraph 34 of Preliminary Questions letter
IMM	MM24	11	129	Policy HOR DM1	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. To reduce the impact on the sector, Applicants/Landowners</u>	Response to Inspector query at paragraph 35 of Preliminary Questions letter
IMM	MM25	11	131	Policy EQU DM1	Requirements g and h be deleted as follows: ".....prevent overuse of the land; g. The applicant has submitted an options appraisal, to demonstrate that the site and location is a better option for the proposed development than the alternatives; and h. The Council will impose conditions and/or use planning obligation agreements to ensure should the equestrian use cease, the land must be left capable of being restored to a productive green environment."	Response to Inspector query at paragraph 36 of Preliminary Questions letter
IMM	MM26	12	138	Policy H SP1	Amend Policy H SP1 Title changed to 'the housing requirement' clarify it is a minimum. State '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.' Amend the years within the table to reflect the periods that HLS figures are collected e.g. 2011/12 to 2015/16, 2016/17 to 2020/21	Response to Inspector query at paragraph 41 of Preliminary Questions letter

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IMM	MM27	12	141	Policy H SP2a	<p>Insert the following to the start of the Policy:</p> <p>"The following strategic housing sites are allocated as shown on the Policies Maps</p> <p>Table 12.3</p> <p>Delete the last paragraph as follows:</p> <p>"...Traveller accommodation.</p> <p>The Council requires well designed development employing a modern approach to principles of the Garden City movement. Development proposals shall be consistent with all other Local Plan policies."</p>	Response to Inspector query at paragraph 42 of Preliminary Questions letter
IMM	MM28	12	143	Policy H SP2	Add new criteria h to Policy H SP2a under 'Pagham' to state 'ensure linkages and accessible pedestrian and cycle routes to the town centre where possible to enhance sustainability and town centre regeneration initiatives'. Also add the same text as new criteria i to the Policy under 'West of Bersted'.	Response to Inspector query at paragraph 43 of Preliminary Questions letter
IMM	MM29	12	151	Policy H DM1	Add additional paragraph to Policy H DM1 that reads; <u>The dwelling mix for market housing shall be 1 bedroom 5-10%, 2 bedroom 40-45%, 3 bedroom 35-40% and 4+ bedrooms 10-15%.</u>	Response to Inspector query at paragraph 45 of Preliminary Questions letter
IMM	MM30	12	151	Policy H DM1	Add additional paragraph to Policy H DM1 that reads; <u>Over the Plan period a proportion of the housing provided should be of a type that meet the needs, as identified in the most recent SHMA, of older people. Such housing could be provided as part of the general mix of one and two bedroomed homes but should be designed to meet the needs of older people.</u>	Response to Inspector query at paragraph 45 of Preliminary Questions letter
IMM	MM31	12	155	Policy AH SP2	Insert additional paragraph into policy AH SP2; <u>The provision of affordable housing on a site at less than 30%, or on an alternative site or by way of a commuted sum will only be allowed in very exceptional circumstances if supported robust evidence to support this including, where appropriate, viability evidence.</u>	Response to Inspector query at paragraph 47 of Preliminary Questions letter
IMM	MM32	12	158	Policy H SP3	Add at beginning of the policy that; <u>This policy would only apply when the housing need cannot be met on allocated hosiugn sites or in the built up area boundary</u>	Response to Inspector query at paragraph 48 of Preliminary Questions letter
IMM	MM33	12	159	Policy H SP4	Delete reference to over concnetration in criteria b	Response to Inspector query at paragraph 49 of Preliminary Questions letter
IMM	MM34	12	164	Policy H SP5	<p>Insert the following at the beginning of HSP 5</p> <p><u>"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.</u></p> <p>1. Planning permission will ...</p>	Response to Inspector query at paragraph 51 of Preliminary Questions letter
IMM	MM35	12	164	Policy H SP5	Amend Policy to state; <u>'Provision for at least 5 private pitches will be made on unallocated sites permitted in accordance with the criteria in 3 below:'</u>	Response to Inspector query at paragraph 52 of Preliminary Questions letter
IMM	MM36	12	166	Policy H DM3	Amend the Policy title to include Rural Workers and amend criteria within section 2 to say <u>conversion to</u> or new dwellings	Response to Inspector query at paragraph 54 of Preliminary Questions letter
IMM	MM37	12	168	Policy H DM3	Break the Policy in two to separate 4 into another policy and renumbered.	Response to Inspector query at paragraph 55 of Preliminary Questions letter
IMM	MM38	13	182	Policy D DM2	Delete the following from D DM2: '...will provide guidance, but development will be encouraged to make the most efficient use of land'	Response to Inspector query at paragraph 58 of Preliminary Questions letter

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IMM	MM39	13	187	D DM3	Delete Policy D DM3 and supporting text.	Response to Inspector query at paragraph 59 of Preliminary Questions letter
IMM	MM40	13	195	ECC DM1	Within areas of protected or sensitive landscapes, areas or buildings, development should generally be small scale or community based.	Response to Inspector query at paragraph 60 of Preliminary Questions letter
IMM	MM41	14	202	OSR DM1	<i>Reword policy to include additional relevant information from evidence (PELVP29)</i>	Response to Inspector query at paragraph 62 of Preliminary Questions letter
IMM	MM42	16	224	Policy HER SP1	Amend criteria c to read "...development proposals must <u>should seek to</u>" amend criteria d ".....developmetn proposals must <u>should seek to</u>" Final paragraph should be amended "... not be permitted..." delete rest of sentence. Replace with <u>unless it can be demonstrated that the loss or harm achieves substantial public benefits.</u>	Response to Inspector query at paragraph 71 of Preliminary Questions letter
IMM	MM43	16	229	Policy HER DM1	Include in HER DM1 text from paragraph 16.2.16	Response to Inspector query at paragraph 73 of Preliminary Questions letter
IMM	MM44	16	231	HER DM2	HER DM2 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: <u>'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'</u>	Response to Inspector query at paragraph 75 of Preliminary Questions letter
IMM	MM45	16	237	HER DM4	Rename the policy and references within it to 'Areas of Character'	Response to Inspector query at paragraph 76 of Preliminary Questions letter
IMM	MM46	17	247	Policy ENV DM1	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..."	Response to Inspector query at paragraph 78 of Preliminary Questions letter
IMM	MM47	17	250	ENV DM2	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..."	Response to Inspector query at paragraph 79 of Preliminary Questions letter
IMM	MM48	18	265	Policy W DM1	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 optional water efficiency standards.	Response to Inspector query at paragraph 84 of Preliminary Questions letter
IMM	MM49	18	268	Policy W DM2	Additional point be inserted between b. and c. saying " <u>The sustainability benefits to the wider community are clearly identified.</u> "	Response to Inspector query at paragraph 87 of Preliminary Questions letter

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IMM	MM50	20	279	Policy WM DM1	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.....	Response to Inspector query at paragraph 90 of Preliminary Questions letter
IMM	MM51	7	55	Policy GI SP1	Insert the following into Policy GI SP1: "... a joined up Green Infrastructure Network. <u>The Green Infrastructure Network must be protected from light pollution to ensure that areas defined by their tranquillity are protected from the negative effects of light in development.</u> Where compatible with".	Response to Inspector query at paragraph 91 of Preliminary Questions letter
IMM	MM52	22	298	INF SP1	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	Response to Inspector query at paragraph 92 of Preliminary Questions letter
IMM	MM53	22	300	INF SP2	Identify area or location for secondary school in policy INF SP2 and on policies map	Response to Inspector query at paragraph 93 of Preliminary Questions letter
IMM	MM54	23	301	Monitoring Section	Take wording from HIS for amendments to 12.1.5. To be included in Matters and Issues. The following wording be inserted into paragraph 12.1.5 "The final policy target takes account of the OAN, the Duty to Cooperate delivery, <u>the stepped trajectory of Policy H SP1, and a 20% buffer and the Liverpool method of addressing the shortfall</u>	Response to Inspector query at paragraph 95 of Preliminary Questions letter
IMM	MM55	24	335	Glossary	Built-Up Area Boundary The boundary is important in setting a distinction between the built form of a main settlement and the surrounding countryside. It is not simply a means of showing the limits of existing development, as some developed areas lie outside it and some undeveloped areas lie within it.	As suggested in ADC - Matter 2 - Strategic - approach - final
IMM	MM56	8	91	EMP DM1 (Section 6)	Amend criterion h so that it reads: h. That it is not in a protected area including Gaps Between Settlements (SD SP3);	To ensure that EMP DM1 is consistent with policy SD SP3 as suggested in ADC - Matter 3a - Employment etc - COMPLETE - 4
IMM	MM57	8	96	EMP DM2	Insert the following <u>Redevelopment of site 2 should not take place until the existing use has been successfully relocated</u>	In order to provide additional information related to the relocation of the existing caravan site use
IMM	MM58	8	96	EMP DM2	Insert an additional criterion after criteria g to read: <u>Development proposals incorporating retail, leisure or office development should demonstrate that the proposal satisfies the sequential test and impact test in accordance with national planning policy.</u>	In order to provide information related to the control of B1 office development

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IMM	MM59	8	85	EMP SP3	To be inserted after point e and before table: Development of site 7 at Angmering will need to be designed as part of the Strategic Housing Allocation (SD9). Due to the close proximity to the South Downs National Park, proposals for the employment allocation will need to demonstrate that the proposal: ☐ Is located in an easily accessible part of the site, in close proximity to the A280; ☐ Is developed in such a way so that it will not have a detrimental impact upon the setting of the South Downs National Park; ☐ ensures that flood risk is satisfactorily mitigated; and ☐ integrates Smarter Choices transport measures.	In order to guide development at the Strategic Employment Allocation at Angmering (site 7).
IMM	MM60	12	139	after paragraph 12.1.11	<u>The Council will monitor housing delivery against the housing trajectory for the District using the indicators specified in the Monitoring Framework set out in the Local Plan. If the Authority Monitoring Report (AMR) demonstrates that annual housing delivery is less than 75% of the annualised requirement or the projected completion rate (whichever is the lower) in three consecutive years (based on the trajectory set out in Figure 12.1 of this Plan and in Appendix A to the Housing Implementation Strategy), the Council will undertake a partial review of this Plan. In undertaking this review, the Council will ensure that sufficient infrastructure capacity is available and that the potential allocation of additional housing sites will not prejudice delivery of the infrastructure required by the Plan.</u>	The Council acknowledges that the Plan will need to include appropriate mechanisms to provide for flexibility and trigger a review or partial review should housing delivery consistently fail to meet required levels over the Plan period
IMM	MM61	12	166-168	H DM3	Amend the title of the policy to Rural workers and replace all references to agricultural, forestry and horticultural to rural, as well as - deletion of criteria g under section 1 - the deletion of bullet d from section 3; and	Responding to Inspector question 6.1
IMM	MM62	12	167-168	New H DM4	Take section 4 from H DM3 and name as H DM4	Responding to Inspector question 6.1
IMM	MM63	12	160	Policy H SP4	In addition to MM33 amend the first paragraph of the policy to read: Where planning applications for houses in multiple occupation (HMOs) are not already covered by permitted development rights, they will be favourably considered where <u>the proposals should contribute to the creation of sustainable, inclusive and mixed communities and meet the following criteria they:</u>	To make the policy more flexible and to aid a decision maker
IMM	MM64	12	145	Poicy H SP2b	Additional criterion after f stating: <u>g. Provide open space at the western end of the site (north of Ferry Road and South of the A259)</u>	In order to ensure that the policy provides clarity regarding the open space element, whilst protecting the gap between Littlehampton and Climping
IMM	MM65	14	202-204	Policy OSR DM1	Delete existing policy and replace with that presented in the Local Plan with Modifications - September 2017 document, as it is too long to reproduce here.	To answer and address Inspector's questions over consistency with national policy.
IMM	MM66	12	145-146	Policy H SP2c	Additional bullet point be inserted under Ford (SD8) as: <u>h. provision of a new secondary school (6FE expandable to 10FE to serve the District)</u>	Reflecting latest position
IMM	MM67	22	300	Policy INF SP2	Delete the last sentence of first paragraph and insert " <u>The secondary school will be situated in Ford.</u> "	To reflect latest position