

Examination of the Arun Local Plan

Agenda for the hearing session on 3 June 2015 (PM)

Issue 4.9: Covering policies EMP DM3 'Littlehampton Harbour' & H SP1 'Littlehampton Economic Growth Area, including West Bank (LEGA)'

Note: Discussion will cover the site-specific merits/demerits and deliverability of LEGA without prejudice to the Council's pending reconsideration of the District's 'objectively assessed housing needs' (OAN). Dependent upon the Council's decision and clarification of that matter (and its implications for the future of the plan) the examination will need to consider the wider aspects of the Local Plan's soundness in relation to OAN, including LEGA and the other sites identified in the plan

The following topics will be discussed in strict sequence. When the Inspector is satisfied that he has obtained the information he needs on each one he will move discussion on to the next topic.

1 Divided policy coverage

The policy coverage of the LEGA, especially that part west of the river, is divided between two policies (EMP DM3 and H SP1). Does this division assist or hinder ALP's effectiveness in terms of its clarity in terms of providing (i) a sound strategic brief for the proposed Area Action Plan, and (ii) a clear focus on what development is to be sought, and where?

2 Clarification concerning the intended quantity of housing provision within LEGA

Policy H SP 1 states that 'up to 1000 additional homes could be built in Littlehampton'. It is not stated that this means within LEGA (as opposed to other central parts of the town on the east bank) but this is presumably what is meant. LEGA includes the West Bank but the BACA Development Delivery Study for that area states (6.27) that '*Increasing development density up to 1,000 units (from lower numbers assessed earlier in the report) and/or improved sales values should generate sufficient land value to provide commercial incentive to the Council and landowners to progress the proposals.*' The ADC Housing Implementation Strategy indicates the possibility that the '*collective capacity of all the LEGA sites can achieve in excess of the 1000 dwellings provided for in the housing trajectory*'. Does ALP require clarification in respect of the above matters?

3 Soundness of the plan concerning the justification of the policies for LEGA and their consistency with national policy, particularly in relation to (a) flooding and (b) other aspects of sustainable development

(3a) Note: Tracing the evolution of this proposal, a series of reports/studies of the West Bank area since 2004 culminated in the GL Hearn/Baca delivery study (SE DP2). This drew attention (7.26) to the need to answer two 'gateway' questions – essentially the sequential/exceptions tests.

It also stated (4.13) that there would need to be an up-to-date Strategic Flood Risk Assessment. ADC paper PE PTP1 sets out the Council's assessment of the proposal against these tests.

Is PE PTP1 a sound and adequate assessment? Does the overall evidence on flood risk demonstrate compliance with paras 101/102 of the National Planning Policy Framework? [Note the Environment Agency's generally unfavourable view on this point at representation PUB-H-SP1-154-EA]

The Duty to Cooperate statement (PE LP13) indicates at para 3.21 that a statement of common ground will be prepared between ADC and the Environment Agency. Has this been completed?

Has there been clear and adequate exploration by the major stakeholders of the potential interrelationship between the future of the Climping Flood Defences, recently assessed by the Environmental Agency, and the managed retreat/tidal flood attenuation/recreation area suggested as part of the West Bank scheme by its promoters? [Note: Some criticism appears to have been made that the former did not take account of the emerging Local Plan proposals.] Does ALP suitably define LEGA/the West Bank in this respect or is there clear evidence that a geographical extension is required to include the potential flood relief area?

(3b) Is there convincing evidence that the scale of the scheme's necessary infrastructure and abnormal development costs has been reliably assessed? [Note: PE LP02 mentions costs 'in the region of' over £40m, ie over £40,000 per dwelling. This is in line with the BACA report which refers to the same level of costs, not including certain matters or land assembly costs]

Is there a reasonable prospect of the scheme being able to support this scale of costs even if funding can be secured from some of the other sources mentioned by the Council in the final 5 paragraphs of the appendix of its response statement concerning Matter 4? What general levels of input might be expected from these sources? [Note: Some of the viability evidence has been subject to redaction]

(3c) Is the plan based on convincing evidence that the balance of all the environmental, economic and social considerations makes this a sustainable development proposal?

4 Is this proposal an effective part of ALP? When is it expected to be delivered?

(4a) Land ownership

The GL Hearn/Baca delivery study (SE DP2) indicates (at 7.32) the types of risks inherent in trying to bring forward development proposal of this complexity and scale where ownership is divided between so many parties. Is it intended to follow the approach discussed at 7.32-56, ie a collaborative approach between landowners until adoption of the Local Plan, followed by a more leading role by the Council or a new public sector-led body?

(4b) What is the timetable for progressing the AAP to adoption?

The Local Development Scheme (2014) is internally inconsistent in stating at para 3.13 that work on the Area Action Plan (AAP) for Littlehampton Economic Growth Area '*need not commence until 6-10 years post adoption of the Local Plan*' whereas Appendix 2 aims for adoption of the AAP in 2018/19. The Housing Implementation Strategy (PE LVPO1) also states that it is expected '*to make proactive progress on the (AAP) in 2014-15*'. ADC is considering updating the LDS to clarify that progress on the AAP will commence in 2015 ahead of any review of the Local Plan. This would require some form of alteration of the text of the Local Plan to clarify matters although this may not amount to a 'Major Modification'.

(4c) Overall timescale of the development

Can it be concluded that there is a reasonable prospect of that LEGA, particularly the West Bank, could deliver development of the type indicated in policies EMP DM3/H SP1 within the plan period? Does the phasing approach indicated in the BACA report indicate a reasonable and practicable scenario?

Note: The Housing Implementation Strategy indicates (3.18-20) that '*the capacity of the area can be unlocked by the third 5-yr period of the plan*' (2025-29). The BACA report (6.21) (probably reasonably?) assumes a 20-yr construction period after commencement, so on that basis development completions during the plan period would be limited.