

Arun Local Plan Procedural Meeting – 16 July 2015

Opportunity to comment to the Inspector on the Council's new position and preferred course of action

The Council's new position

On 1 June 2015 Arun District Council's Local Plan Sub-Committee considered a report on the consequences for the examination of updated work on the 'full objectively assessed need (OAN) for market and affordable housing' undertaken by its consultants. This advised that the OAN was 'not likely to be less than 758' compared with the figure in the submitted plan of 580.

The sub-committee rejected 'Option A (continuing with an OAN of 580) but also considered two other alternative options. The first (option B) was to ask me to suspend the examination for 6 months while provision is identified for an OAN of 641pa. The other (option C) was to withdraw the submitted plan and prepare a replacement local plan providing for 758pa. On 17 June ADC's Full Council decided to adopt the sub-committee's recommendation to pursue option B and ask for a suspension.

The figure of 641 dwellings pa in Option B reflects the top of a range identified in a pre-submission report (650), minus 9 dwellings pa estimated to be provided outside this plan within Arun's portion of the South Downs National Park.

Implications of the Council's position for the soundness of the plan and progress of the examination

In rejecting Option A the Council accepts that the plan was not sound at submission. When considering which of option B (suspension) or C (withdrawal) represents the appropriate way forward, the following questions provide the general framework - what is the scale and nature of the work required to overcome the perceived shortcomings of the document, how long would this take, and what would it lead to? This would cover issues such as the preparation of any new evidence, studies, or plan content; new sustainability appraisal; and necessary consultation upon new/revised elements of the plan.

The report to (and minutes of) the sub-committee, and the report to the Full Council discuss a number of matters which have led ADC to favour suspension over withdrawal.

An additional piece of evidence bearing upon the matter is ADC's updated view of the 5-year land supply situation set out on the examination webpage under reference ADCED02. This update was requested by the Inspector under reference IDED10 in order to gain some perspective upon whether or not the assumed advantage of option B over option C in terms of protecting the District from 'planning by appeal' is likely to be a substantive one.

While ADC's paper identifies some problems in updating of the situation precisely due to the current availability of some data, a question may arise whether or not it is a sound proposition to adopt a plan based upon an OAN significantly below the latest household estimates or whether the plan would afford protection against 'planning by appeal' with the Hearn report still available as evidence at appeals.

In addition, a rigorously tested 5-year supply of deliverable land would be a pre-requisite for a plan to proceed to adoption and there may be questions about how far this could be demonstrated IF the candidate sites for allocation were to be limited to those identified in the sub-committee report.

I am willing to receive reasoned comments from Representors upon any of the above matters and which of the options (suspension or withdrawal) represents the appropriate way forward. Replies will be used in preparing an agenda for the Procedural Meeting. Any responses should not exceed 3 pages of A4 and should include the Representor number and name. The Programme Officer needs an e-mailed copy (sent to caroline.pattenden@arun.gov.uk) and 3 hard copies, 2 stapled and one unstapled and by 1st July 2015. As no signatures, e-mail addresses or phone numbers can be shown due to the data protection act, please just include these in a covering letter and not on the A4 pages. Thank you.

Roy Foster
Inspector

19 June 2015