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12 April 2016

Your Ref:

Our Ref: TP/0416

Please ask for:
Karl Roberts
Strategy Department
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Dear Town/Parish Council Clerk

On 24th February 2016, the Parish Clerks' Liaison Group met officers of the Arun Planning Policy and Conservation Team. Meeting notes are enclosed for your record and for circulation.

The meeting covered three key issues as follows:

- Local Plan update including Objectively Assessed Needs (OAN)
- Housing and Economic Land Availability Assessment (HELAA)
- Conservation Area Appraisals
- Arun Local Plan/Neighbourhood Plan relationship including overview of Planning Practice Guidance (PPG) revisions

This letter has been prepared to ensure that dialogue between Arun District Council and Town and Parish Councils continues. In particular, with the aim of keeping you updated on the work that officers are undertaking to test the higher OAN figure recently announced by the Planning Inspector as part of the Arun Local Plan Examination in Public (EiP).

Before introducing this work, it may be helpful to provide some context and an update on the Arun Local Plan for your reference.

Background

The Arun Local Plan (2011-2031) Publication Version (October, 2014) (which will be shortened to 'ALP' for the remainder of this letter), was submitted to the Secretary of State for independent Examination in Public (EiP) by the Planning Inspectorate in January 2015. The ALP submitted to the Inspector required 580 dwellings per annum (dpa).

EiP hearings followed submission in June 2015. At this time, the Inspector was made aware of further evidence emerging which increased the housing requirement figure (OAN) to 758 dpa. The Inspector held a Procedural Meeting in order to determine how the ALP EiP should proceed. It was concluded that the OAN evidence should first be consulted on, with a hearing to follow in early 2016.

The OAN hearing took place on January 14th 2016 at Arun District Council, led by Inspectors Mr Roy Foster and Mr Jonathan Boare (who has now replaced Mr Foster as the ALP Inspector due to Mr Foster's retirement). On the 2nd February, the Inspectors' letter was received which formally suspended the ALP EiP for a period of fifteen months. Furthermore, the letter concluded that the OAN figure for Arun District Council should be 845 dpa.

This figure must now be tested against supply side constraints to determine whether it can realistically be met through the provision of both strategic and smaller sites within the district. The outcomes of this work will be presented as main modifications to the ALP, which will undergo public consultation towards the end of this year.

In the meantime, taking into account the OAN figure of 845 dpa, Arun District Council cannot demonstrate a five year supply of deliverable housing sites. Under paragraph 49 of the National Planning Policy Framework (NPPF), relevant policies for the supply of housing cannot be considered up-to-date. This includes emerging ALP policies as well as policies within 'made' and emerging Neighbourhood Plans.

Technical Work – Testing the OAN

In order to test the higher OAN figure, officers have commenced technical work, including a Transport Study, Landscape Assessment, Strategic Flood Risk Assessment and Employment Study to assess the environmental, social and economic impacts of additional strategic sites upon the District.

In addition to the assessment of strategic sites, the Council must identify how smaller sites across the district can contribute towards the five-year supply of deliverable housing sites. This work is to be undertaken through an update to the Arun Housing and Economic Land Availability Assessment (HELAA), in accordance with planning practice guidance.

This process will identify and assess housing sites across the district, with a capacity for five dwellings or more, including sites that have previously been considered as potential neighbourhood plan sites.

Notwithstanding whether Town and Parish Councils have 'made' Neighbourhood Plans in place, it is important that they are engaged in this process in order to assist in achieving an up to date planning framework for the district. Involvement would include a Neighbourhood Plan review process to identify additional site allocations or assistance in the identification of sites to be assessed through the HELAA process.

With such a significant increase in the housing requirement in the district, the Council has no option but to look at every possible site/location for additional housing – the requirement is to 'leave no stone unturned' in this process. Therefore, sites throughout the whole of the district (including those with made Neighbourhood Plans) are required. It is very important to stress this at the outset.

Officers will shortly be undertaking an informal consultation on the HELAA. This will aim to gather a range of information such as whether details relating to sites, identified to date through the HELAA, are accurate and also whether there are any sites that have been missed. The consultation will be accompanied by a call-for-sites form which will allow new sites to be promoted to the Council. An indicative timetable for updating the HELAA is as follows:

April 2016	4 week informal HELAA update consultation and call-for-sites
June 2016	Report to Local Plan sub-committee identifying newly promoted and assessed sites
October 2016	Final HELAA reported to Local Plan sub-committee. The HELAA will be published on the ADC website.

Next Steps

The Parish Clerk's meeting in February was important to initiate a dialogue on the importance of identifying new sites across the district to contribute towards Arun's revised OAN. Testing the OAN in this way is crucial for the preparation of main modifications to the ALP and for a sound plan.

The relationship between the emerging ALP and 'made' neighbourhood plans was also discussed at the meeting. It is clear from recent revisions made to the Planning Practice Guidance that Neighbourhood Plans must be based on up-to-date housing needs evidence. This letter therefore emphasises the importance of the work to update the HELAA and also highlights the importance of the consideration, by each Neighbourhood Plan Group, to ensure that Neighbourhood Plans are up to date. If they are not, those areas will continue to be vulnerable to development pressures.

To ensure continued liaison on this matter, you are invited to attend a meeting on **21st June 2016** at **Barnham Community Hall**, Yapton Road, Barnham, PO22 0AY from **10:00am until 12.30pm**. I would also like to extend the invitation to a representative from your Neighbourhood Plan Group. It is hoped that a representative from DCLG will be in attendance.

RSVP to the meeting by emailing caroline.pattenden@arun.gov.uk by Friday 27th May, stating the names of those who will be attending.

An agenda for the meeting will follow.

Yours sincerely,



Karl Roberts
Director of Planning & Economic Regeneration

Enclosed: Arun District Council Parish Clerk's Liaison Meeting 24th February 2016 - Meeting Notes