

Attention: Mr Mark Dakeyne
Planning Inspector
c/o Banks Solutions

8 March 2018

Your Ref:

Please ask for:
Planning Policy Team
Directorate of Place

Our Ref: KO/sdb

Dear Mr Dakeyne

Arun Local Plan Main Modifications Consultation

Arun District Council (ADC) has identified from the Main Modifications consultation response, that with regard to a limited a number representations, the authority considers it would be helpful to set out the Council's position.

These clarifications, with the exception of MM61, are considered to be 'non-material' changes and are set out under the numbered Main Modifications listed below:-

Settlement Structure & Green Infrastructure

MM6:

Some consultation responses raise concerns that progressing the Non-Strategic Sites DPD (NSSDPD) may be delayed because of the need for monitoring (e.g. ALPMMods197). ADC are committed to delivering the NSSDPD as soon as possible in accordance with the published Local Development Scheme (2017) and the Council is already allocating resources and scoping the work program for this with a view to accelerating the timetable. ADC also acknowledges the inconsistency of the terminology and that this DPD should be referred to as the Non-Strategic Sites DPD in the LDS and not Small Sites DPD.

MM8:

A number of representations raise issues regarding the ability of a Neighbourhood Plan or DPD to alter and potentially undermine the policies of the Local Plan (e.g. ALPMMods65) with regard to criterion f. (which correctly pointed out would become criterion e.). ADC would therefore suggest the supporting text paragraph 7.2.8 includes the following clarification to the effect as shown underlined: "e. If a subsequent DPD or Neighbourhood Plan (which is in general conformity with and supports the strategic local policies of the Local Plan) deems it appropriate..." This 'non-material' change would merely reflect the National Planning Framework paragraph 184.

Tourism Related Development

MM18:

Concern has been raised in some consultation responses to the modification to Policy TOU DM1 which removes the opening paragraph leaving the policy as a list of criteria. The Council believes this is an oversight and would suggest that Clauses 1 and 2 are retained without numbering and therefore read as opening paragraphs to the sub clauses, which would then be number chronologically. This would be a simple remedy.

Chapter 16 Building Conservation & Archaeological Heritage

MM46:

ADC suggests that a paragraph is retained (under a heading 'External Space Standards') within the Plan to explain that external space standards, which is the subject of ongoing work, will be set out subsequently within a Design Guide SPD and ADC suggests this factual position may be remedied through Additional Modifications with the following text.

13.3.6 The Council will prepare a detailed Design Guide which will include guidance on external space standards. Planning applications will be expected to have regard to these when submitting proposals for development to include adequate provision of private external space.'

MM51:

The Policy HER DM4 Main Modification removes the word 'special'. However, the supporting plan text still includes several references where the word 'special' needs removing and ADC suggests this may be remedied through Additional Modifications.

Infrastructure Provision & Implementation

MM61:

Some consultation responses raise issues that development is not being supported through necessary supporting infrastructure, specifically in relation to the potential allocation of a secondary school at Ford (e.g. ALPMMods10; ALPMMods166; ALPMMods212). Given the hearing discussions identified that work was ongoing, an allocation within the Local Plan could not be sustained at this time. However, it remains the Council's view that an area of search is appropriate and should be broadly indicated in this part of the district through retaining a reference (within Policy INF SP1) to an area of search as follows: "The broad location of search is defined as being in the central part of the district based on the increase to the pupil population from the Strategic Sites."

Sustainability Appraisal

Angmering Parish Council has raised concerns regarding the Sustainability Appraisal (SA), and the reduction in the Angmering Employment site 7 from 8.3 ha to 3 ha and that this has not been appraised with the supporting housing provision. Land Use Consultants who undertook the SA on behalf of the Council confirm that the July 2016 SA tested 500 dwellings at Angmering as the low option to 800 dwellings on the site, which was also assessed. Paragraph 2.36 of the SA explains why the high capacity for the sites was selected for inclusion in the Plan. Reasonable Alternative RA1 tests the two employment allocations together of Enterprise Bognor Regis and Angmering at 8.3ha. The SA of the further main mods assesses Angmering North at 3ha as an individual site.

If you need any further clarification to discuss the contents of this letter please contact me.

Yours sincerely

A handwritten signature in black ink, appearing to be 'NC' followed by a flourish and a period.

Neil Crowther
Group Head of Planning

