

ARUN LOCAL PLAN EXAMINATION

Date: 12 April 2018

To: Neil Crowther, Group Head of Planning

Dear Mr Crowther

Arun Local Plan Examination

I have been working through the Main Modifications (MM) in connection with the preparation of my report into the Examination of the Local Plan. I have noted some omissions and inaccuracies¹. I would also request an update on some issues. These matters are set out below:

Retail

- Add 'Village and Suburban Centres are the equivalent of local centres in the NPPF' at the end of para 9.1.5. This was included in the Publication Version of the Plan (PELP37) at the end of para 9.1.5 but not included in the January 2018 version at all (MM15).

Housing Delivery

- Table 12.1 on page 136 was to be updated to reflect the figures set out in Appendix 3 of PELVP31. This should be included as part of MM23.
- In addition the table in Appendix 3 was drawn up on the basis of the shortfall up to 2017 being met in the next 5 years (2017-2022) in accordance with the Sedgefield method. This should be reflected in paragraph 12.1.5 (MM22).
- Picture 12.1 (housing trajectory) has been updated and this should be flagged up as part of MM23.
- In terms of Policy H SP1, the footnote under Table 12.2 does not appear to be relevant as there is no 6 year period. It should be deleted as part of MM25.
- The Gypsy and Traveller Accommodation Assessment (GTAA) identifies a need for 9 public pitches but Policy H SP5 as modified would only provide for 4 public pitches.
I cannot find a reason for this discrepancy in the evidence or my notes. Please could the Council point me to the reason for the difference?
- The Council's statement on Matter 4b indicated that an updated GTAA would be progressed with projected final report by January 2018. What is the up to date position?
- In Policy H DM3 the reference to 'conversion' in Section 2 should be within Section 1 of the policy. In other words in relation to criteria d. could the functional need be met by the conversion of an existing building on the unit? (MM43)

¹ Page and paragraph references are in relation to the Publication Version of the Plan (PELP37)

- In addition Section 1 should be titled 'Permanent rural workers' dwellings'. (MM43)

Design

- In Policy D SP1 the modification relating to the definition of major development is not included as a MM.
- It was agreed at the hearings that Section 4 of Policy D DM1 would include the word 'appropriate' before 'innovative design' but this is not included as a MM.
- It was agreed at the hearings that Policy D DM2 would include reference to the exceptions in paragraph 13.3.5 but these are not included as a MM.

Water

- The reference to the optional standards within Policy W DM1 should be included as a MM rather than AM46.

Transport

- Does T SP3 reflect the up to date position? The Council's statement on Matter 6 indicated that MMs would be made to reflect the latest position.

Infrastructure

- It was agreed that Policy INF SP1 would include specific reference to the Infrastructure Delivery Plan which should be included in MM59.

Additional Modifications

- There is a typo in the last sentence of para 22.0.24 (22.0.25 of the January 2018 version of the Plan).
- Some of the AMs included within the Schedule do not appear to have been picked up in the tracked changes version of the LP (January 2018).

The above omissions and inaccuracies should be incorporated into updated Schedules of MMs and AMs. Please could a final version of the Schedule of MMs (Word document) be sent to me taking into account these changes and others mentioned recently by Monday 23 April 2018. I would also be grateful for a response on the other matters by the same date.

If you require any clarification on these points please contact me through the Programme Officer.

Yours sincerely

Mark Dakeyne

INSPECTOR

Inspector: Mark Dakeyne BA (Hons) MRTPI