

ARUN LOCAL PLAN EXAMINATION

Date: 27 November 2017

To: Karl Roberts, Director of Planning and Economic Regeneration

Dear Mr Roberts

Arun Local Plan Examination

Thank you for the e-mails of 16, 22 and 27 November 2017 and the various attachments.

My response to the various matters is set out below:

Response to Interim findings

I have considered the response and note the proposed Main Modifications (MMs) that arise which have been added to the Schedule of MMs. I also note the additional documents added to the evidence base, notably PEPP10, PELP33b, PESP6 and the update to PECP9 and/or PECP10. In relation to the latter it would appear that it is PECP10 (Enterprise Bognor Regis Transport Review 2017) that has been updated and not PECP9. Is this correct? In addition is it possible to highlight those parts of the document that have been amended?

There will be the opportunity for representations to be made on these documents alongside consultation on the MMs.

There is one document that is not within the evidence base, SEDP7 entitled 'Note of clarification on primary school provision from West Sussex County Council (WSCC)'. Is this available?

In relation to the response to paragraph 23, PESP6 should be entitled 'Angmering North Allocations Landscape Assessment'.

With regard to paragraph 21, the Statement of Common Ground indicates that the site area of the Yapton allocation is 24 ha. At the hearings the Council said that there had been 'an error in the site area' when the allocation was considered at an earlier stage which had resulted in the 400 dwelling allocation. Please could the Council point me to the documentation within the evidence base which dealt with the allocation at Yapton, including any committee papers and Housing and Economic Land Availability Assessments.

Main Modifications

I have made detailed comments on the Schedule of MMs attached to the e-mail dated 16 November and these are set out in the attached document. It does not appear that this Schedule differs significantly from that attached to the e-mail dated 22 November. Suggested additions/revisions to the text are shown in **red**. Comments are shown in

'comment boxes'. Hopefully these are clear as providing commentary on an Excel Document is not as simple as doing so on a Word document. To simplify the schedule and make it easier to relate to the Local Plan¹ (LP) the following principles should be followed (as referred to at the final hearing session):

- The MMs should be set out in plan order and reordered accordingly.
- MMs relating to a particular policy and its explanation should be combined into a single MM.
- Superfluous wording should be removed from the schedule for clarity.
- There is no need for the column entitled 'Reason for Modification'.
- The final schedule should be in Word format.

The title of the document is out of date. It should be simply called 'Main Modifications to Arun Local Plan (plus date)'.

Additional Modifications (AMs)

AMs are not necessary to make the LP sound but I have made a few comments on the Schedule attached to the e-mail dated 16 November to assist you as set out in the attached document. The document should be titled 'Additional Modifications to the Arun Local Plan (plus date)'.

Further Documentation and Evidence

During the hearings a Memorandum of Understanding (MOU) between Arun and WSCC was referred to. However, nothing was submitted and to date there is no such document on the Examination Website. Is the MOU to be published?

The Daily Action Sheet refers to notes in response to Actions 60 and 62 and Policies W DM1 and W DM2. Where can the notes be found?

I note that the Inspector's report into the examination of the Adur Local Plan was published on 29 September 2017 and that the Council intend to adopt the Plan in December 2017. Are there any implications from this progress for the contents of the Arun LP?

The Government's 'Planning for the right homes in the right places – Consultation Proposals' were published before the examination hearings and referred to during the hearings. Do the Council consider that there are any implications arising from this consultation document for the contents of the Arun LP?

Programme Officer

What is the position in relation to the provision of a Part Time or 'as needed' Programme Officer to cover the remainder of the Examination? A Programme Officer should be in place until the Inspector's fact check report is delivered. Paragraph 5.33 of 'Procedural Practice in the Examination of Local Plans' provides the necessary advice.

¹ PELP37 – Publication Version showing Modifications – March 2017

The Way Forward

The Council should refine the Schedule of MMs taking into account the above comments. I would like to see the 'final version' before it is subject to SA and published for consultation. In this respect it should be sent to me by 8 December 2017.

I note that you have produced a version of the LP purporting to show all Modifications (MMs and AMs) proposed since the March 2017 version of the plan. There is no requirement to publish such a document alongside consultation on the Schedule of MMs. However, should the Council wish to do so to help people to understand the proposed changes then the document should be carefully checked to ensure that it includes all suggested MMs and AMs. As it stands the document does not appear to include all these.

The MMs to the LP will need to be subject to an updated Sustainability Appraisal and potentially updated Habitats Regulations Assessment. The updated reports should be published alongside the MMs at consultation stage.

In paragraph 35 of my interim findings dated 11 October 2017 I set out an indicative timetable for the remainder of the Examination. Is this timetable still realistic so far as the Council is concerned?

I look forward to a response on the above as soon as possible and no later than 8 December 2017.

Yours sincerely

Mark Dakeyne

INSPECTOR

Enclosed: Schedules of MMs and AMs with comments

Inspector: Mark Dakeyne BA (Hons) MRTPI