

Parish Clerk Liaison Meeting

3rd October 2018

Purpose of the meeting:

- To ensure continued liaison with Parish and Town Councils regarding the Arun Local Plan progress.
- To further consider the relationship between the ALP and 'made' Neighbourhood Development Plans (NDPs), and to continue to share the process of the Non- Strategic Sites Development Plan Document (NSS DPD) work alongside the Neighbourhood Plan review process.
- To discuss the National Planning Policy Framework and its implications. Particularly para. 65 which is signalling that in relation to Neighbourhood Planning, local authorities should provide a housing requirement figure for designated Neighbourhood areas.
- To discuss the methodology for distributing the housing figures for NDPs
- To discuss the sustainability appraisal scoping consultation.
- To understand the sustainability issues that are considered and to experience how the SA framework is applied in practice.

Below is the agenda for reference followed by a summary of the discussions and questions that arose from the meeting. The Power Point presentation has also been made available online along with these notes at <https://www.arun.gov.uk/parish-briefings>

Agenda

1. Introductions/Apologies
2. Update: Timetable, NPPF, CIL, Open Spaces SPD, The housing methodology distribution
3. Questions and Answers
4. Sustainability Appraisal Scoping Consultation
5. Session 1 – Key Sustainability Issues
6. Session 2 – Using SA Framework

1. Introductions/Apologies

No apologies

2. Update

• Timetable

- NSS DPD Timetable – 2 stage Regulation 18 Notification: stage 1: I/O Spring; stage 2: draft Plan summer 2019. Overall it is approximately 2 years so adoption estimated in Spring 2021

• NPPF

- Revision published July 2018
- Some notable paragraphs being:
 - ADC allocate housing targets for NPs – No need to revisit the OAN (para 65)
 - Adopted LP to defend 5 yr Housing Land Supply 1 yr (para 74)
 - Deliverable sites – outline pp or allocated, complete within 5 years – stronger evidence (page 67 Glossary)
 - Efficient use of land (recycling previously developed land and minimum densities - accessible to public transport) (para 122)
 - Entry level homes – exception sites (para 71)
 - The application of the ‘Presumption’ (paras 13 and 14 – to be read with 11d)
 - NDP site allocation sizes (paras 68 and 69)
 - Design (paras 124 and 130)

• CIL

- CIL refreshed viability evidence (consistent with Plan viability)
- CIL remains viable for certain types of development (last look in 2015 PDCS)
- Currently seeking a decision to prepare a charging schedule
- Identifies that most infrastructure required on strategic sites will be delivered through S106 contributions [10,700 dwellings circa 50% of supply].
- Must keep ICDP 2017 up to date - ADC will consider Parish/NP infrastructure bids as part of the first round of consultation on the CIL charging schedule including as a result of intelligence on land supply resulting from Parish engagement on the NSS DPD or via Neighbourhood Plan processes..

• Open Spaces SPD

- Consultants appointed and Undertaking evidence review of open space related infrastructure requirements
- Report LP sub Cttee in spring 2019
- SPD Full Consultation

• The housing methodology distribution Non- Strategic Sites Development Plan Document (NSS DPD) and NP Methodology

- Consultation on draft methodology end July and proposed housing targets (at least 1,250 dwellings) – delay so extended to 21st Sept
- 3 Parishes no response (Aldingbourne Felpham and Pagham) [Note: workshop confirmed Felpham reviewing NP and agree indicative figure]
- 1 Parish responded but no view (East Preston)
- 6 Parish not reviewing or preparing Neighbourhood Plans or disagree with the proposed figures, supply or methodology (Arundel, Climping, Ferring, Kingston, Rustington, Middleton On Sea) [Note: workshop confirmed Middleton On Sea do not intend preparing a NP and sent an alternative housing target and Arundel clarified that they are reviewing their Neighbourhood Plan but consider that their figure could be different after assessment]
- 6 Reviewing /preparing NP of which:-,
- 2 Parishes Lyminster & Crossbush and Poling agree the figures – and will review joint NP [Note: following workshop Lyminster & Crossbush clarified that they are still assessing their position on the proposed figures and whether to prepare NPs -or jointly]
- 2 Parishes Barnham and Eastergate agree the proposed figure 75 (Eastergate zero proposed figure) via joint NP but depends on clarification on supply [Note: workshop confirmed BE is a joint plan – but they are not reviewing and consider the target housing figure is not sustainable on the basis of the proposed 1st April 2018 start date for monitoring]
- 1 Parish agrees amended figure subject to supply clarifications and amended figure (Angmering)
- 1 Parish uncertain whether housing should be via NSS DPD or NP review and proposed figure is subject to supply clarifications (Yapton) [Note: Workshop confirmed Yapton consider their figure unsustainable if based on a 1st April 2018 start date for monitoring]
- 1 Town Council Bognor Regis agrees figures but unclear if via NP
- 1 Town Council Littlehampton undecided – may prefer NSS or entirely separate NP but also need clarification on the basis for the proposed figure and what housing supply can contribute towards it [Note workshop confirmed already engaging on the NSS DPD process on smaller sites monitoring towards the proposed figure but defers any decision pending outcome of the HELAA update]
- 1 Parish Walberton uncertain because concerns about the methodology and eligible supply
- 4 Parishes no allocation (Aldwick, Bersted, Ford, Eastergate) [Note: workshop Aldwick confirmed still assessing their position on reviewing NP or not]

- **Methodology**

- Prepare NSS DPD working with the 10 Parishes not preparing NPs /expressing a view (and the 4 Parishes with no allocation)=14 (circa 419 dwellings)
- Work with the 8 reviewing or seeking clarifications – uncertain next 2 weeks (circa 830 dwellings)
- High level Parish pro-forma (ADC)– size character and constraints RAG rating for feeding into Sustainability Appraisal
- Detailed Parish Pro-forma (Town +Parish Council)

- Parish Workshop in January – broad locations/site options
- Reg 18 I/O consultation

3. Q/A

Notes have been made, where possible, of the range of questions asked (not verbatim) at the meeting and the answers given below

Q. Clarification note: Barnham and Eastergate is a joint Plan and currently do not intend to review this Plan

A. Noted.

Q. Does a Neighbourhood Development Plan (NDP) need to be reviewed every 2 years?

A. The government does not intend for an NDP to be reviewed every 2 years, however as before if there is no Plan in place or the LPA does not have a 5 year land supply, then this weakens the weight of the housing policies in the NDP. Note: NPPF para 14 should be read together with para 11d and applies where the LP is out of date, no LP in place or does not have a 5 year land supply.

11 d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

14. In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided all of the following apply:

a) the neighbourhood plan became part of the development plan two years or less before the date on which the decision is made;

b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement;

c) the local planning authority has at least a three year supply of deliverable housing sites (against its five year housing supply requirement, including the appropriate buffer as set out in paragraph 73); and

d) the local planning authority's housing delivery was at least 45% of that required⁹ over the previous three years.

Q. Clarification note: Middleton-On-Sea will not be doing an NDP but disagrees with the indicative housing allocation number for the parish and have suggested an alternative figure.

A. Noted.

- Q.** If the NSS DPD is not adopted until 2021, do planning applications which come forward within this time count towards the allocation?
- A.** ADC will devise an interim monitoring target which identifies which sites will be counted.
- Q.** How will communications with various parishes be done over the next 2 weeks?
- A.** We would like parishes to have 1:1 meetings with us to further discuss individual issues. (Post meeting, we have met with all the parishes that have requested meetings to date.
- Q.** Clarification note: Felpham is reviewing their Plan and agree to the indicative figure. It is anticipated that Reg.14 will be mid February 2019.
- A.** Noted.
- Q.** Clarification note: Yapton is reviewing their Plan but feels the indicative figure is not sustainable in regards to their infrastructure.
- A.** The SA process will test the figures and will identify any impacts and mitigation which will result in any amendments to the indicative allocation figures.
- Q.** What is the base date for Planning permissions to count towards the allocation?
- A.** The base date is April 2018.
- Q.** Clarification note: Lyminster & Crossbush is still considering its options and no firm decision has been made on whether they will be doing an NDP or if indeed it will be joint.
- A.** Noted.
- Q.** Arundel is reviewing their Plan and intends to start Reg.14 consultation in November. Can they rely on the indicative figure?
- A.** This figure has not been through the SA process so if the parish intends to allocate sites then it will need to produce the evidence to justify it and go through the site selection process.

4. Sustainability Appraisal Scoping Consultation – Consultant: Clearlead

- Legal requirement for SA and SEA
 - Aim: to ensure a high level of environmental protection, to integrate the consideration of the environment into plan preparation, with a view to promoting sustainable development.
- EqIA – measures potential impacts on different groups protected by equalities legislation, notably the Equalities Act 2010.
- HIA – measures potential health impacts of policies, plans and projects. HIA is not a statutory requirement of the plan preparation process but is a recommendation of PPG.
- SA is of the NSS DPD – need to link to the previous SA of the Arun Local Plan 2011-2031.

- New SA Scoping Report for the NSS DPD - all updated information available for subsequent stages of the SA process.
- Scoping report – currently out to consultation (six weeks from 12pm on 17th September to 11:45pm on 29th October 2018).
- Framework based on that used for SA of the Arun Local Plan.
- Reflects key issues of relevance to the scope and objectives of the NSS DPD.
- Headline objectives are the key objectives against which the DPD and its alternatives will be tested.
- Sub-objectives provide a finer grain of assessment which can be applied to options for site allocations and policy wording.
- Justification provided for why sustainability objectives are scoped in or out of the assessment.

5. Session 1 – Key Sustainability Issues – Consultant: Clearlead

- Purpose: To invite attendees to comment on the baseline information and issues of interest
- 4 tables were provided with 3-5 topics to allow attendees to comment on their topics of interest and identify any key issues.
- Table 1: Landscape, Transport & Air Quality and Housing.
- Table 2: Soils & Mineral Resources, Water, Climate Change Adaptation and Biodiversity & Geodiversity.
- Table 3: Social Infrastructure, Health and Population & Communities.
- Table 4: Town Centres, Economy & Employment, Climate change contributions & Energy, Historic Environment and Resources Use, Waste & Recycling.
- The information will be used by the consultants to further inform their work and any clarification needed will be sought by Clearlead.

6. Session 2 – Using SA Framework – Consultant: Clearlead

- Purpose: to demonstrate how the SA framework will be used to test the sites. This will facilitate understanding of the site selection process and how the sites will be tested.
- Provision of an example of an assessment matrix and significance criteria to explain how the assessment will be undertaken.
- Discussion on the application of the SA framework to an example site in Arun.
- Handouts – Site proforma, SA framework, Significance criteria and definitions
- The scoping report is being consulted on with key stakeholders for a six week period from 12pm on 17th September to 11:45pm on 29th October 2018.
- Responses should be sent no later than 29th October to email to: localplan@arun.gov.uk
- The next step in the SA is the assessment stage (B) during which emerging options / sites will be assessed.