



## Summary of representations received by Arun District Council as part of Regulation 16 publication and submitted to the independent examiner pursuant to paragraph 9 of Schedule 4B to the 1990 Act

**Parish/Town name: Ferring Parish Council**  
**Consultation date : 14th July 2014 to 25th June 2014**

**Please note: ADC comments are submitted as a separate document**

All the original representation documents will be included in the examination pack. The table below may be a summary of the representations received so may not always be verbatim.

Name	Date received	Method of submission	Summary of representation
<p>Nigel H. Johnstone                      (Directors of Little Paddocks Freeholders Ltd on behalf of its residents and stakeholders)</p>	<p>20/6/14</p>	<p>Post (hard copy)</p>	<p>We are vigorously opposed to the inclusion of The Little Paddocks, in the Ferring Parish Neighbourhood Development Plan 2014-2029. We therefore respectfully request that all references to Little Paddocks be removed from this development plan.</p> <p>Reasons for submission:</p> <ol style="list-style-type: none"> <li>1. No consultation.</li> <li>2. No consent</li> <li>3. Negative impact on the Estates environment</li> <li>4. Increased maintenance costs</li> <li>5. Opposition from residents and stakeholders</li> </ol> <p>Appendix 1 – Voting letter and results                      Appendix 2 – Extract from FPNDP (2014-2029)</p>
<p>Chris Hemmings                      on behalf of Persimmon Homes South Coast</p>	<p>05/06/2014</p>	<p>Email</p>	<p>Persimmon Homes own land to the east of Green Park and the site is available for development.                      We understand that the Neighbourhood Plan is seeks to provide sites for 50 dwellings although 'Policy H SP1 Strategic Housing, Parish and Town Council Allocations' is currently excluded from the Arun District Local Plan (Publication Version February 2014) in order for more technical work to be undertaken on housing sites.                      We would like to put forward land to the east of Green Park as a potential housing site in the scenario where the alternative CRTBO sites are not deliverable during the plan period.                      The land to the east of Green Park site is currently located within the Ferring-Goring Strategic Gap, Arun District Council's latest Strategic Housing Land Availability Assessment (2012) concluded that the site is suitable in principle for future housing development.                      The earlier Pre-Submission version of the Ferring NP (May 2013) included 'Policy 6: Land at Green Park', which stated that</p>

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			<p><b><i>“In the event that, at the time of a review of the Neighbourhood Plan by 2019, it is evident insufficient housing will be met by Policy 5 [Land at Ferringham Lane], then land off Green Park, as shown on the Proposals Map, will be re-considered as a potential allocation in the period 2020-2029.”</i></b> This policy was subsequently deleted from the Revised Pre-Submission Plan (February 2014).</p> <p>We would argue that:</p> <ul style="list-style-type: none"> <li>flexibility in the NP is important</li> <li>settlement boundaries and strategic gaps are reappraised as a consequence.</li> </ul> <p>In essence, we do not believe that development at land to the east of Green Park would have a detrimental impact on the Ferring-Goring Strategic Gap, especially the area between the current settlement boundary and the Arun District boundary. We acknowledge the need for potential allotment land (at least 0.25 hectares.</p> <p>The land to the east of Green Park site provides sufficient land for allotments.</p>
Andrew Triggs South Downs National Park	25/06/2014	Email	<p>The Ferring Neighbourhood Plan seeks to steer small developments to land within the built-up area boundary and close to the village centre. The alternative is seen as <i>“to simply abandon any chance of fulfilling the wishes of the majority of residents and to surrender yet another piece of a strategic gap to development over which the Parish Council would have no control”</i>. The plan does not allocate any development within the National Park (the northern area of the Parish, around Highdown Hill).</p> <p>It is welcomed the final sentence in the Vision refers to conserving and enhancing the landscape of the National Park, however it doesn't make sense as a whole: i.e. “nor on the character of the village”.</p> <p><u>Monitoring and review</u> The commitment to formally review the Plan in five years' time is welcomed.</p> <p><u>Housing delivery</u> SDNPA is satisfied the plan seeks to address the housing needs of the parish.</p> <p><u>Policy 2</u> It is unclear whether the requirement for the Ferring Community Centre to be <i>“open for occupation prior to the occupation of the final dwelling”</i> is realistic.</p> <p>The statutory tests for seeking planning obligations are set out in the Community Infrastructure Levy Regulations 2010 and in the National Planning Policy Framework. Planning obligations are expected to mitigate the impact of unacceptable development to make it acceptable in planning terms and para. 173 of the NPPF states <i>“the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.”</i></p> <p>Even if all other criteria are met, its delivery would hinge on the Community Centre. It is appreciated a viability assessment has been undertaken but at this time, the provision of <i>“a larger and better located allotments site”</i> and the effect this may have cannot reliably be established. (CRTBO para. 6.3.8 and 6.3.10) Section 106 obligations (in contrast to Community Infrastructure Levy) cannot normally be used to fund generalised infrastructure not related to an allocated site.</p> <p><u>Policy 6</u> The references to appropriate screening taking into consideration the surrounding landscape character are welcomed. Para. 4.28 refers to the surrounding landscape</p>

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			<p>character, however the Plan should cross-refer to evidence already described i.e. "Littlehampton and Worthing fringes and Worthing and Adur fringes SC11/SC13" of the West Sussex Land Management Guidelines and landscape character assessments prepared by Arun District Council.</p> <p><u>Policy 8</u> typo in third paragraph – word proposals appears twice.</p> <p><u>Proposal 4</u> The register is not created by the Local Planning Authority as it is not Planning legislation. Community Right to Build Orders The sites are located outside the National Park. There are no comments to make in addition to Policy 2 above.</p>
Martin Small English Heritage	03/06/14	Email	<p>As stated in paragraph 2.10, that there was considerable support in the community for preserving, inter alia, Ferring's conservation areas.</p> <ul style="list-style-type: none"> <li>• We welcome and support the inclusion of:</li> <li>• Policy SP24 of the Arun Local Plan 2014 - 2029 on the Historic Environment in paragraph 2.27.</li> <li>• references to "attractive environment", "distinctive character of the village" and "historic buildings and areas" in the Vision as set out in 3.1.</li> <li>• Objective 3 but regret the loss of the proposed measures relating to Areas of Special Character and Buildings and Structures of Special Character.</li> <li>• No measures relating to heritage assets. We suggest "No adverse impact on the significance of a heritage asset" and perhaps "No designated or undesignated heritage assets at risk".</li> <li>• the addition of criterion III to Policy 3: "Ferring Village Hall" and the addition of criterion ii. to Policy 4: "Land at Ferringham Lane" although we would prefer "conserves" to "sustains"</li> <li>• Policy 7: "Local Green Spaces"</li> <li>• Policy 8: "Village Centres" that the design and/or use of proposals in a defined village centre will cause no significant harm to a Building or Structure of Special Character.</li> <li>• Addition of criterion ii. to Policy 9: "Ferring Community Centre", although we would prefer "conserves" to "sustains" as terminology more consistent with the National Planning Policy Framework.</li> <li>• Its a pity that there is no specific policy for the conservation and enhancement of the historic environment as there was considerable support in the community.</li> <li>• the principle of the review of the Conservation Area in Proposal 2 and inclusion of additional areas, bearing in mind paragraph 127 of the National Planning Policy Framework. In this respect, the suggested inclusion of modern development is a concern to us.</li> <li>• We are also unclear why it is being proposed to remove the land to the north of The Old Flint House from the Conservation Area;</li> <li>• the proposed new Conservation Area Appraisal.</li> <li>• Proposal 3: we are content to leave it to Arun District Council's Conservation Officer to consider whether Little Paddocks and The Poplars merit designation as</li> </ul>

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			<p>Conservation Areas</p> <p><u>Strategic Environmental Assessment</u></p> <p>Comments are:</p> <ul style="list-style-type: none"> <li>• In the table after paragraph 8.2, numbers of all heritage assets and the proportions of those assets at risk should be included.</li> <li>• In the table after paragraph 8.6, we would suggest that the impact of Strategic Objective 2 on the SEA Objective for the historic environment should be assessed</li> <li>• The impact of Strategic Objective 4 on this SEA Objective could, be assessed as positive.</li> <li>•</li> </ul> <p><u>Community Right to Build Orders</u></p> <p>English Heritage has no objections to the proposed Community Right to Build Orders in terms of their potential impact on higher grade designated heritage assets and we are content to leave consideration of the potential impact of the proposed developments on the Grade II listed Landalls and Vine Cottage and Rose Cottage near the Village Hall and the Conservation Area near the Community Centre to Arun District Council's Conservation Officer.</p>
Emma Cartwright On behalf of Natural England	19/5/2014	Email	No comments made. Received a letter outlining NE involvement in Neighbourhood Planning.
Angela Atkinson on behalf of Marine Management organisation	28/5/2014	Email	The MMO has reviewed the document and whilst we have no specific comments to make we would like to draw your attention to the remit of our organisation as you may wish to be aware of this in relation to the consultation.

Prepared by: Donna Moles (ADC Neighbourhood Development Plan Officer) June 2014