

## **Ferring Neighbourhood Development Plan Plan Proposal submission**

**Consultation 14<sup>th</sup> May 2014 to 25<sup>th</sup> June 2014**

### **Arun District Council (ADC) Reg.16 comments**

Prepared By: Donna Moles

#### **Please note:**

**The comments below are reflective of the views of ADC as a Council and include representations from all Departments who have commented. The comments are to be signed off by the Assistant Director of Planning and Economic Regeneration or his nominated representative.**

The Council fully supports the community's initiative to produce a Neighbourhood Development Plan. Neighbourhood planning aims to give people greater ownership of plans and policies that affect their area. The government is clear that the intention of Neighbourhood Development Plans should be to set out policies on the development and use of land in a neighbourhood area and that the local planning authority has a duty to support production of the plan.

Our approach at this stage is therefore to make final representation on the Ferring Neighbourhood Development Plan to the Examiner for a forthcoming examination.

#### **ADC comments**

As part of good planning practice, ADC previously made comments on the working draft plan and pre-submission plans. Therefore the comments below are a natural progression and are on the plan proposal submission.

The following list outlines any comments we have identified in the submitted plan documents:

#### **Submission Plan**

1. **General note** All references to the Submission Arun Local Plan 2014-2029 should be changed to the exact submission which was used. In this case it probably is the Summer 2013 version. The current one is Publication Version of the Local Plan (Regulation 19) Excluding the Spatial Portrait, Employment & Enterprise, Housing Allocations, Transport, Monitoring and Implementation sections. Feb 2014

2. **section 2003 Arun Local Plan (p14)** Add GEN22 Buildings or Structures of character to the list?
3. **Arun Local Plan 2014-2029 (p16)** Amend references to policy names. Also include all built heritage policies?
4. **Policy 2 (p21)** Policy has the potential to affect the setting of a heritage asset (the Henty Arms) and this should be taken into consideration.
5. **Para 4.6 (p21)** The brackets included in this para refer to a Submission Local Plan – there has not been a document of this name created and therefore to locate. Suggest following minor change:  
“...(..Policy SP5 of the ~~Submission~~ Local Plan (**Summer 2013**))”
6. Similar to Reg 14, there is mention of financial contribution towards Policy 9 but it is intended to be delivered by the Parish Council – as such do not understand how this is intended to work, you want to agree a reasonable proportion from yourselves to go towards building out your other development?
7. **Para 4.11 (p22)** Considering the content of this paragraph and how critical this is, it would seem that there should be something within the policy referring to this. Suggest the following is added to Policy 2:  
**iv. access to the site has been agreed with the District Council as the planning authority and the County Council Highways department**
8. **Para (p22)** Clarity is required here as the supporting text and supporting documents talk of the Parish Council developing sites, so surely this would be under their control?
9. **Policy 4 (p24)** The site has issues for the conservation area and would require sensitive design – setting of Conservation Area.
10. **Point 1 of Policy 3** Same as that above about contribution towards policy 3.
11. **Para 4.22 (p25)** Correction required to the first sentence. Corrections as follows:  
“...though the ~~Submission~~ Local Plan (**Summer 2013**) of 2103
12. **Policy 6** – Any value in a reference to the Publication Plan policy re Soils, Horticulture, Equine.?
13. **Last para of Policy 8 (p27)** Minor correction needed. Following minor correction needed: “...will resist proposals ~~proposals~~ for planning...”
14. **Proposal 2 (p32)** It would be useful to liaise with the Conservation officer on this proposal including reviewing the Ferring Neighbourhood Plan: Ferring Conservation Area Boundary Review Report.
15. **Para 5.11 (p33)** this needs to be done in conjunction with the conservation officer and not just given mention in the plan. There is a process to undergo.
16. **Proposal 3 (p34)** This still seems to be mixing two things. It seems slightly confusing and it would be useful to liaise with the Conservation officer on this proposal including reviewing the Ferring Neighbourhood Plan: Ferring Conservation Area Boundary Review Report.
17. **para 5.18 (p34)** Should reference be made to an area appraisal, and not conservation area appraisal as the recommendation is to create new Areas of Special Character?
18. **Proposal 4 (p36)** There is a process which needs to be followed. This proposal should either be removed or revised to read differently. At the moment it reads like these buildings have been designated and they have not. ADC welcomes the initiative of adding these buildings as assets of community value, but the parish council should ensure they register the buildings using the ADC procedure to mitigate any unwanted circumstances in the future. The NDP group through the parish council should seek to nominate the buildings which they wish to be listed as Assets of Community Value to make this policy viable. Please see the procedure to embark on this.  
<http://www.arun.gov.uk/main.cfm?type=ASSETSOFCOMMUNITYV>
19. Policies 2 , 3 and 4 need to adhere to Arun District Council’s Local Plan in respect of affordable housing requirements. They would each need to include an explicit requirement to provide for 15% affordable housing, ideally on-site, but possibly by way

of a commuted sum if a particular development were to comprise of 7 dwellings or less.

The objectives in the Neighbourhood Plan as currently set out fail to recognise the requirement for affordable housing alongside market housing.

### **Consultation Statement**

1. It is evident from the Consultation Statement that the Group have made a thorough and determined effort to ensure that the preparation of the Neighbourhood Plan has captured opinion from all key sections of the local community. All parties with an interest in the Neighbourhood Plan have had considerable opportunity to input to the process.
2. Section 5.0 outlines the requirements of the consultation as required by the Regulations but all the information then references Annexes which does not do for ease of reading. These are a main component of this document and would be better included within it.

### **Basic Conditions Statement**

1. For completeness of this document it is important to clearly identify for general conformity with the strategic policies contained in the Development Plan for the area, that the development plan consists of the adopted Arun District Council Local Plan 2003 (saved policies), the adopted West Sussex Minerals Local Plan July 2003 (saved policies) and the West Sussex Waste Local Plan Revised Deposit Draft July 2004.
2. **Para 3 of Policy 3 in first table (p6)** Greater emphasis in the rest of this about the parish council owning the site but yet there is mention of a planning obligation being flexible to ensure viability – as at Reg 14, not sure how this is intended to work

**Arun District Council fully supports the plan and the fundamentals of the policies drafted but our comments highlight any potential issues and conformity issues.**

**It does not purport to decide on whether the plan meets the basic conditions, that is for the independent examiner to decide.**

Comments Approved by Assistant Director of Planning and Economic Regeneration or the nominated representative:

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Signed on:

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