

Examination of the Arun Local Plan (ALP)

Agenda for the hearing session on 4 June 2015

Issue 4.7: Barnham/Eastergate/Westergate (BEW)

Note: Discussion will cover the site-specific merits/demerits and deliverability of the BEW proposals without prejudice to the Council's pending reconsideration of the District's 'objectively assessed housing needs' (OAN). Dependent upon the Council's decision and clarification of that matter (and its implications for the future of the plan as a whole) the examination will need to consider BEW in the context of other aspects of the Local Plan's soundness, including its position in relation to the question of other reasonable alternatives.

The following topics will be discussed in sequence. When the Inspector is satisfied that he has obtained the information he needs on each one he will move discussion on to the next topic.

1 Justification for the scheme Do the terms and criteria of the BEW allocation at policy H SP1, specifically the matters stated in the first 13 bullet points (and as supported by the Visioning Brief - PELVP08 and/or the BEW Concept Masterplan of December 2014 - attached to rep H SP1 553) provide a sound and sustainable strategic policy option for meeting Arun's housing needs?

Representations identify a number of particular factors said to make this an unsound allocation (see below). Are these overriding constraints, whether taken individually or together? All the matters in italics below will be covered in strict sequence:

1.1 Landscape;

Are the landscaping and open space criteria in the policy sound and deliverable? [see BEW consortium response statement at 2.12 - 2.14 & appendix 3.9 and the table in the ADC response for Issue 4.7]

1.2 'Local gaps' policies;

How much weight should be attached to the loss of the 'gap' defined in the current development plan? (see ADC, BEW consortium and 3 Villages responses)

1.3 High quality agricultural land; (see ADC, BEW consortium and 3 Villages responses)

How much weight should be attached to the loss of high quality agricultural land?

1.4 Flooding and drainage issues; [noting the representations of the Environment Agency PUB-H-SP1-154-EA, Southern Water PUB-12.1.39-518-SWS plus its hearing statement; and West Sussex CC, and the textual changes to ALP agreed between ADC and Southern Water as set out in Appendix A to ADC's response statement concerning Matter 4; also noting the representations by the 3 Villages Action Group and the report prepared for them by Richard Allitt Assocs dated April 2014]

Do the BEW consortium responses at paras 2.15-19 and appendices 3.2 (groundwater and surface water flooding), 3.3 (sustainable urban drainage systems) and 3.7 (waste water drainage strategy) together with the views of the Environment Agency and Southern Water provide a suitable degree of evidential confidence that these issues are capable of being appropriately managed within the detailed master plan such that the water and drainage criteria in the policy can be met?

1.5 Transport infrastructure and accessibility issues;

Is the allocated site appropriately located in terms of accessibility? Are the 'transport and movement' criteria in the policy appropriate and deliverable?

How much weight/benefit should be attached to the realignment of the A29 through the site? Does the consortium's response at para 2.20 and appendix 3.1 of its statement provide appropriate evidential confidence on these issues, including the prospect of the development supporting its share of the cost of the A29 realignment proposals (the balance of the £36m indicated in the ADC response statement to Matter 6, minus £13m of local growth funding)? Could the scheme function without the northern and southern 'tie-ins', phased as may be appropriate? [It appears that an off-line bypass for Shripney is not considered by the County Council as a priority for further investment to mitigate the impact of Local Plan development – see 4.7.29 of ADC statement for Matter 4.]

1.6 Biodiversity;

Does the consortium's response statement at 2.21 - 2.22 and appendix 3.6 provide appropriate evidence that the biodiversity significance of the site has been recognised and that master-planning could ensure that the biodiversity enhancements sought in the ecology criteria in the policy could be achievable, including mitigation of any unavoidable material aspects of harm?

1.7 Heritage;

Are the heritage criteria in the policy sound and appropriate?

1.8 Social and community infrastructure needs;

Are the 'community health, education and retail facilities' criteria in the policy appropriate and deliverable? [See BEW consortium statement appendix 3.11 concerning the ranges of needs generated by the development for primary and secondary education provision, health facilities, retail provision at a local centre, and other local facilities.]

1.9 Community support/the Neighbourhood Plan;

What weight should be attached to the Neighbourhood Plan?

2 Viability Is the evidence concerning viability and funding availability robust? Does this indicate that BEW will be viable, including the provision of affordable housing at 30%? [The assessed infrastructure requirements of the scheme, and the expected sources of funding are stated in the Housing Implementation Plan (PE LVP01 at para 3.11) and the Infrastructure Delivery Plan and discussed at paras 4.7.30 – 4.7.37 of the ADC response to Matter 4]

3 Effectiveness/deliverability Will the land owners be able to work together and complete development in a timely way? Is the involvement of other owners or other nearby land necessary to secure a sustainable and deliverable site? The BEW Landowners Consortium statement says that it controls about 85% of all the land within the proposed allocated area. A 'statement of intent' is at their appendix 2 and work is said to be taking place on a Memorandum of Understanding preparatory to a formal collaboration agreement. [The owner of the allocated land north of Barnham Road and east of the A29 is not part of the promoters' consortium but indicates support for the proposals and states his willingness to work with others in planning and implementing the scheme.] Does this land include the north-west tie-in?

Is the BEW scheme sound and deliverable at 2000 dwellings, or does the joint landowners' concept master-plan and the consortium's evidence make a sound case for increasing the allocation to 3000 homes? Would this involve extending the area of the allocation as appears to be suggested in the Concept Masterplan? [Sustainability Appraisal (SA) would be required for any larger scheme. This has not been undertaken by ADC, although see the consortium's SA of a 3000 unit scheme at appendix 1 to its statement and the conclusions at 2.10 of that statement.]

Is ALP too reliant on the deliverability of BEW, and therefore ineffective? What are realistic assumptions about the expected number of completions during the plan period? [The Council assumes 200 pa from 2019. The BEW consortium suggests 200 pa from 2018-31 resulting on their different basis of 3,000 dwellings overall in 400 of a total of the 2,600 being deferred beyond the plan period].

Would the timing issues referred to at the end of Southern Water's statement delay completions at BEW or does the consortium's statement (para 2.19) adequately deal with this point?