



**Aldingbourne Neighbourhood Development Plan
Plan Proposal submission
Consultation 8th June to 20th July 2016**

Arun District Council (ADC) Reg.16 comments

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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 Director of Planning and Economic Regeneration or his nominated representative and then sent to the Examiner with the examination pack as per the timetable.

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 Neighbourhood Development Plan to the Examiner for a forthcoming examination.

ADC comments

As part of good planning practice, ADC previously made comments on the pre-submission plan. 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 comment:** All the maps require keys to be added to them. Without this there is confusion over what is being covered or intended by them, which potentially may have contributed towards some of the comments that follow.
2. It would be clearer if only the actual policy was enclosed in the box and then the supporting text below it.
3. The site context plan on page 13 is not legible.

4. **P10:** this talks about a target of 845 homes/pa. This is not a target, it is the OAN. The target has yet to be established.
5. **P 16 Para 3.4.7:** As provided previously as written this is incorrect. The sentence beginning with Article 10 either needs removal as it is not appropriate within this section.
6. **Policy EH1 and Map E:** Changes to the BUAB to take account of certain developments since 2003 and 'made' neighbourhood plans will occur as part of the main modifications to the Arun Local Plan 2011-2031. As such there will need to be consistency between Map E and that included in the Main Modifications.
7. **Policy EH2 and Map A:** Without a key to the map, it is believed that the areas blocked in a darker colour are intended to be those identified as 'immediately adjacent to'. Two of these would fall in the western part of a strategic site being considered through the Local Plan process. There is potential conflict with strategic elements of the Arun Local Plan 2011-2031 **so this policy needs to be deleted.**
8. **Policy EH3** – for clarity, add an "or" at the end of the first bullet point: It supports the diversification of an agricultural enterprise or other land-based rural business, or; the need for the development clearly outweighs the harm.
9. **P35 Para EH5.5:** Where has the reference to the water table being less than 0.7 below ground level come from? And more pointedly are County happy with the inclusion of something that says that they will be involved with approving SUDS prior to development? This needs to be discussed with County.
10. **Policy EH7:** The policy should ensure that the settings of heritage assets are not harmed. The last point of this policy could be restrictive as it would not allow for any technologies that a farm may wish to use or could be complimentary, such as anaerobic digestion.
11. **Policy EH8:** suggests a degree of control on non-listed buildings which is similar to that for listed buildings. This should be qualified. The issue of using Article 4 Directions will require some thought and should not be viewed as a given. They will need to be implemented by the District Council should they be deemed the appropriate vehicle and are not the remit of a neighbourhood plan.
12. **Policy EH10** As currently written this is not really a policy but more of an intention.
13. **Policy H1:** What are the local character and distinctiveness of the area? There is no evidence base document which has looked at that. The justification given is NPPF 7 but this does not give any local context and as such officers will have nothing to use when determining applications in this regard.
14. **Policy H2:** No evidence to provide need or viability impacts of this policy.
15. **Policy H4, H5 and H6:** the 40% affordable housing provision requirement needs to be backed by evidence and referenced in. The housing need survey done does not evidence 40%. The proposed policies will not address the shortage of affordable housing and will worsen the situation making the place less affordable for new households and young people as they propose a maximum density of 26 per HA - it would help provide more affordable homes if this was the minimum density. Generally the other housing policies, that are both specific to this site and generic appear to be unrealistic and over restrictive. E.g. policy H3 has unrealistic expectations about opposing "buy to lets". Equally policy H4 has unrealistic expectations about viability and density and H5 restricts to local need only which

cannot be justified. Furthermore policy H6 which relates to windfall requires 40% affordable housing. This ignores the current threshold for affordable housing of 10 dwellings. Similarly policy H9 is totally unrealistic about local connections.

16. **Policy H7:** Unsure this is needed, as section 21 of the ALP covers this – strategically and with individual development policies.
17. **P32 – Environment and Heritage objectives:** the reference to climate change that is included in the main paragraph is intended to be about adapting to climate change. In addition it cannot state what ‘ecosystem services’ will contribute to, as this is an umbrella name for the various functions that green infrastructure can provide. To be accurate, prioritise the functions that are intended to be covered and ease of reading the following amendments are recommended:
“...Ecosystem services will ~~contribute~~ be supported **and enhanced through adapting** to climate change, habitat management, food production and cultural and recreational benefits ~~and food production by:~~”
18. **P40 Para GA3.3:** Minor correction needed as there would seem to be a repeated word; otherwise the second bullet does not make sense. Suggest to correct as follows:
“Avoid large ~~large~~ parking courts to the rear of dwellings”
19. **Policy LC6 and Schedule B – Local Green Spaces:** There seems to be an inconsistency with the selection of sites considering that the site ‘Land Behind Elmcroft Place’ has been rejected as being part of the strategic housing site, whereas this equally applies to site 12 ‘Land East of Ivy Lane’.
In addition to the point above, the District Council would consider that the case for site 12 to be classed as Local Green Space is not warranted (supported by evidence?), emphasised by the last sentence, and would counter the content of para 76 of the NPPF. Site 12 should be removed.
20. **Map A** – This requires a key.
21. **Map C:** key or note it is unclear what the differentiation is between the area marked as A and B. Key or note needs inclusion to explain the differentiation between the areas marked as A and B.
22. **No policy LC10 but there is a map C.**
23. **Evidence documents:**
The column with the policy reference that the evidence relates to, has not been updated, so these are discussed as included in the submitted document.
4 - Though the Biodiversity Corridor map is clearer at a larger scale although neither of these include a key outlining the distinction between the two areas coloured on the maps.
13 - It would be fairer to either also include for policy EH3 (reference taken from Evidence Base document) the Joint Statement that was produced between the Consortium’s consultant and Richard Allitt.
34 – the document dates from 2012. To allow an accurate assessment, the most up to date information should be provided, which would be the concept masterplan submitted with the representations at Reg 19 that went to the Inspector.
42 - What is the point of the Trojans evidence, as this does not seem to provide information specific to the Parish or the neighbourhood plan.

Arun District Council supports the plan and the fundamentals of the policies drafted but our comments highlight any potential issues and conformity issues which we deem necessary.

It does not purport to decide on whether the plan meets the basic conditions, this is for the independent examiner to decide at this point.

DELEGATED AUTHORITY: NEIGHBOURHOOD DEVELOPMENT PLANS

The Neighbourhood Planning (General) Regulations 2012 - Parts 5 and 6

Background:

Arun's constitution sets out how the Council operates, how decisions are made and the procedures that are followed; to ensure that decisions are efficient, transparent and accountable to local people.

A key priority of the Council is to draft and adopt the Local Plan in order to appropriately guide and manage growth across the District. Recent changes to the plan making system include the introduction of the Localism Act, which also makes provision for Neighbourhood Development Planning. To reflect the changes to the plan making system, and to clarify the roles of committees and alterations were made to the constitution in relation to Neighbourhood Development Planning functions for reasons of expediency.

Current delegated Authority as set out in the Constitution:

Under Part 4- Officer Scheme of Delegation, Section 2 paragraph 5.24

Neighbourhood Development Plans

The Director of Planning and Economic Regeneration or other Designated Officer shall be responsible for all planning matters relating to Neighbourhood Development Planning under The Neighbourhood Plans (General) Regulations 2012 - Parts 5 and 6.

Exercise of delegated authority by the Director of Planning and Economic Regeneration:

In accordance with the above, the Director of Planning and Economic Regeneration or his nominated representative hereby authorises:

Comments on Aldingbourne Reg.15 Plan Proposal submission

Signed:



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Director of Planning and Economic Regeneration

Date:

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20/7/16