



**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: Aldingbourne Parish Council  
 Consultation date: 8th June 2016 to 20<sup>th</sup> July 2016**

**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
Thomas Pettyt Highways England	22/06/2016	Email	We do not have any comments.
Mr & Mrs West	05/07/2016	Email	<p>We commented in the last stage of consultation (Reg 14 Feb-March 2016), albeit slightly late, however our comments do not appear on the responses summary and therefore we repeat our comments/concerns below to this further stage of consultation on the Aldingbourne Neighbourhood Plan.</p> <p>We do not support the continued proposal in the neighbourhood plan, which the recent Inspector also wished to be removed, that the level crossing should remain open to vehicles if the new road is built. We consider that this should be removed from the plan in EE1.2 as well as policy GA4. The benefit to the few businesses along the road does not outweigh the benefit to the community of the village along the A29, including the safety of local residents.</p> <p>We agree that a pedestrian access should be secured, if possible, if the level crossing is closed which would enable residents to access the pub, shop and school the latter two with only a short walk from the furthest property to the south of the level crossing to get to these facilities.</p> <p>The proposal to make Hook Lane into a 'Quiet Lane' would effectively become that without any designation if the level crossing was shut, as only local traffic would use the lane rather than it being a cut through to avoid traffic build up to the level crossing on the A29. The 'unlit village' status in policy EH10 could also be supported through the changed function of the A29 with potentially less lighting requirements if the level crossing were closed.</p>

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			<p>The reference in policy EE1 is incorrect as it is policy GA4 regarding the level crossing not GA3.</p> <p>We support the Plans policy LC1 Support Independent Living, with more accommodation for the elderly or infirm in the village. We therefore question why in policy H2 Housing Mix only 'at least 25% of dwellings should meet the Lifetime Homes Standards, or its equivalent'. We consider this should be higher if not all new dwellings to meet this requirement if evidence supports this.</p>
Nick Williams Natural England	11/07/2016	Email	<p>I would like to reiterate comments a colleague of mine made on Thursday 19<sup>th</sup> November 2015. Specifically around the use of the word '<u>Ground cover</u>', the suggested wording is taken from the National Planning Policy Framework and offers slightly more robust paragraph that would safeguard efforts to protect these important habitats and species.</p> <p><i>Development that damages or results in the loss of ancient trees/trees of arboricultural and amenity value or loss of hedgerows <del>and/or significant ground cover and habitat</del> priority habitat, or which significantly damages ecological networks will be resisted. Development proposals must be designed to incorporate biodiversity within and around developments and enhance ecological networks, seeking to retain wherever possible ancient trees, trees of good arboricultural and amenity value and hedgerows to contribute to the Government's target to halt the decline in biodiversity by aiming for a net gain for nature. Proposals should be accompanied by a survey that establishes the health and longevity of any affected trees or hedgerows and a management plan to demonstrate how they will be so maintained.</i></p>
Charlotte Mayall Southern Water	12/07/2016	Email	<p>In summary, we seek the following amendments to the plan:</p> <ul style="list-style-type: none"> <li>- Additional text in Policies EH1 and EH2 to ensure that they do not unduly restrict the deliverability of utility infrastructure.</li> <li>- A new policy with provision to support the provision of utility infrastructure.</li> </ul> <p><b>Policy EH1</b> <b>Built up area boundary (page 32)</b></p> <p>Southern Water understands the desire to protect land outside of the built up area boundary from development. However, we cannot support the current wording of policy EH1. Policy EH1 of the Aldingbourne Parish Neighbourhood Development Plan does not meet the basic conditions necessary for a Neighbourhood Development Plan (NDP), namely: to have regard to national policies and advice contained in guidance issued by the Secretary of State and contribute to the achievement of sustainable development. Our proposed amendment would accordingly be in line with the NPPF and NPPG and so enable the basic conditions of a Neighbourhood Plan to be met (new text is underlined):</p> <p><i>Proposals for development outside of the built-up area boundary that do not accord with development plan policies, will be resisted, unless it is for essential utility infrastructure, where the benefit outweighs any harm, and it can be demonstrated there are no reasonable alternative sites available.</i></p>

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			<p><b>Policy EH2</b>  <b>Green Infrastructure and Ecosystem Services (page 33)</b>          Southern Water understands the desire to protect Green Infrastructure Corridors, woodland and hedgerows. However, we cannot support the current wording of policy EH2 as it could create a barrier to statutory utility providers, such as Southern Water, from delivering their essential infrastructure required to meet stricter environmental standards or serve existing and planned development.          Our proposed amendment would accordingly be in line with the NPPF and NPPG and so enable the basic conditions of a Neighbourhood Plan to be met (new text is underlined):</p> <p><i>New development within or immediately adjacent to the Biodiversity Corridors or identified on Map A will only be supported where it can be clearly demonstrated that development proposals will not give rise to any significant harm to the integrity or function of the Biodiversity Corridors, or it is for essential wastewater infrastructure, where the benefit outweighs any harm.</i></p> <p><b>Omission of policy</b>  <b>Provision of additional wastewater infrastructure</b>          As our previous representations identified, we can find no policies to support the delivery of new or improved infrastructure, which may be required to serve new development. Without this policy provision, the NDP does not meet the basic conditions necessary for NDP, namely to have regard to national policies and contribute to the achievement of sustainable development.          The following proposed policy provision supporting the delivery of utility infrastructure, would be consistent with Arun District Council's emerging Local Plan, have regard to national policies and advice contained in guidance issued by the Secretary of State and contribute to the achievement of sustainable development:</p> <p><i>New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community, subject to other policies in the development plan. Development will be coordinated with provision of infrastructure.</i></p>
<p>Stella New South Downs National Park Authority</p>	<p>18/07/2016</p>	<p>Email</p>	<p>General comments made regarding:</p> <ul style="list-style-type: none"> <li>• The title</li> <li>• The date</li> <li>• The plan should make reference to the purposes and duty of the South Downs National Park</li> <li>• the correct name for the plan is 'South Downs Local Plan (SDLP)', the words 'National Park' should be removed</li> <li>• There is confusion between 'Settlement Boundary' and 'Built up Area Boundary'</li> <li>• Consider revising the first sentence to: 'The majority of the Parish lies within Arun District Council Planning Authority Area, with two small areas in the north lying within the South Downs National Park Planning Authority Area'.</li> <li>• The site map on p13 does not include all of the Designated Neighbourhood Area, specifically the northern boundary.</li> <li>• The ANDP should seek to demonstrate how it meets with the requirement of Section 62, 11(A) of the Environment Act 1995 to have regard to the purposes for which National Parks are designated, for those</li> </ul>

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			<p>areas of the parish which lie within the National Park.</p> <ul style="list-style-type: none"> <li>• Policy SD24 is already covered within NPPG.</li> <li>• The threshold defined in Policy H4 is currently inconsistent with emerging policy SD24 and national guidance, and if the policy is retained, it should include lower thresholds in the SDNP.</li> <li>• Clearer definition could be given to the phrase 'the...role of the settlement'</li> <li>• Policy EH10 should be reviewed in light of emerging SDNP Local Plan Policy SD9.</li> <li>• Policy GA - Contact WSCC Highways to confirm procedures needed in order to designate Quiet Lanes as this does not fall within planning jurisdiction.</li> <li>• Policy EE7 - We recommend that this policy also seeks to enhance archaeological, architectural, historic or environmental features where possible, in line with the Purposes of the National Park. The policy should also include a provision to protect the amenity and activities of neighbouring properties.</li> <li>• P50 - Reference should also be made to the SDLP Preferred Options document</li> <li>• Schedule D - siting of Buildings and Structures of Character would be helpful.</li> <li>• Schedule E - It would be helpful to include selection criteria and supporting evidence for why these additional buildings have been selected.</li> <li>• A lost canal crosses the southern end of the Parish as referenced in para 3.7.7. A specific Policy to protect the former line of the canal, its archaeological significance and its setting, would be a really useful contribution to the national heritage significance of the locality.</li> </ul>
Hannah Packwood Environment Agency	19/07/2016	Email	Based on the environmental constraints within the area, and that no sites are being allocated in the Neighbourhood Plan, we have no detailed comments to make.
Mark Schull Nathaniel Lichfield & Partners On behalf of BEW Consortium	20/7/2016	Email	The PSNP should be amended to have regard to the emerging allocation at BEW. As a minimum it should identify and safeguard the land within the Plan area as part of an emerging Local Plan allocation, and acknowledge that development will come forward on this land during the Plan period. Policy GA4 should also be amended to remove reference to potentially onerous mitigation requirements and also to have regard to the wider benefits that would arise as a result of the A29 realignment and closure of the Woodgate Level crossing.
Lucy Seymour-Bowdery West Sussex County Council	20/7/2016	Email	<p>Given that the Submission Neighbourhood Plan for Aldingbourne includes the proposed allocation of a site for camping / touring caravans, it should be noted that this will be subject to the resolution of any highway safety and access issues at the planning application stage or as part of a consultation on a Community Right to Build Order. The County Council has previously provided comments on the Neighbourhood Plan, and would like to provide the following further comments:</p> <p><b>Policy EH5:</b> In the supporting text under EH5.5, please remove reference to the 'relevant SUDS Lead Local Flood Authority (WSCC) and replace with 'Local Planning Authority (LPA)'.</p>

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			<p><b>Policy GA4:</b> As stated in previous comments, the closure of Woodgate level crossing may be a possibility if the A29 realignment is delivered but no decision has been taken to close the level crossing. The Parish Council does not need to establish a position at this stage. It is acknowledged in the supporting text under GA4.3 that the Neighbourhood Plan should not pre-judge the outcome of this decision. It is therefore suggested that this policy is removed. The supporting text could be included in an appropriate section of the Neighbourhood Plan for context.</p> <p><b>Policy GA6:</b> It is understood that this policy has been separated from the traffic management policy in the Pre-Submission version. Whilst the aim of the policy is now clearer, it is suggested that the reference to formally proposing a change to the legal status of these lanes is removed or moved to the 'community aspirations' section (in the absence of evidence to support this approach).</p>
Robert Lloyd – Sweet Historic Places Advisor	20/7/2016	Email	In general, within the areas of interest to Historic England, I am pleased to confirm that in our view the plan meets the basic conditions.
Andrew Gregory Luken Beck	21/07/2016 <b>Late</b>	Email	<p>Neighbourhood Planning is not intended to be a tool to prevent or stymie new development from occurring. Neighbourhood planning is about shaping the development of a local area in a positive manner, which can and should include policies that set out where housing need could be met in the Parish.</p> <p>Map A (under the provisions of draft Policy EH2) of the Reg 15 ALP 2016 should be revised to remove the biodiversity corridor designation on the arable fields and grasslands, which are not BAP priority habitats, having regard to the <i>Assessment of the site as a Biodiversity Corridor (ECOSA Ltd March 2016)</i> and the BEW Strategic Allocation in the ADLP. The inclusion of the arable fields and grasslands within the designation is not supported by proportionate and robust evidence and is therefore contrary to the PPG.</p> <p>In light of the lack of evidence for inclusion of the arable fields and grasslands within the designation, the extent of the proposed designation is considered an unreasonable and unnecessary constraint on the ability of the Submission Draft Local Plan to plan for the up to date housing needs evidence and meet the OAN through the Strategic Allocation. The biodiversity corridor designation should be confined to the areas of 'Comparative Ecological Value' illustrated in the Ecological Constraints and Opportunities Map, attached as Appendix C. These areas mainly comprise the land immediately adjacent to the Rife watercourse, retained hedgerows, field margins and unmanaged scrubland in the south-west of the site. Should a planning application be submitted on our client's site for a comprehensive residential development a sustainable development could come forwards in a way that is consistent with Policy EH2, subject to restricting the biodiversity corridors designation to the field margins and watercourse through a revision to Map A.</p>

Prepared by: Donna Moles (ADC Senior Planning Officer) 21<sup>st</sup> July 2016