

Appendix 1: Summary of  
Representations Received  
on the Arun Local Plan  
Main Modifications  
Consultation

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## **CHAPTER 5 The Key Diagram**

The key diagram shows a spatial representation of the Local Plan vision, providing a broad indication of how the District will develop over the lifetime of the Plan.

### **DESCRIPTION OF MAIN CHANGES TO SECTION**

Recreation of the Key Diagram to reflect the updated strategy.

### **MAIN MODIFICATIONS IN SECTION**

MM1 – The Key Diagram has been recreated from scratch.  
MM2 – Parish and Town Council Allocations removed.  
MM3 – Strategic Employment Areas replaced with Strategic Employment Boundaries.  
MM4 – Broad Locations for Strategic Growth replaced with new Strategic Site Boundaries.  
MM5 – Safeguarding the Main Road Network updated to reflect policies.  
MM6 – Gaps Between Settlements now exclude land designated as Strategic Sites.

### **NUMBER OF REPRESENTATIONS (Who from; Support / oppose; Statutory Consultees)**

30 representations were received on Chapter 5 The Key Diagram.

The majority of comments on this section were from residents. Residents commented upon a number of issues including transport; consultation; objections to strategic allocations particularly Pagham and Bersted; map details; there is not enough employment being proposed in the west of the District; urban sprawl; Strategic Employment Sites boundaries; Strategic Housing Sites boundaries; coalescence and reduction of the gaps between Littlehampton, Climping, Ford and Yapton; the Plan ignores other development areas such as Ford in general and for a larger number.

Climping Field Protection Group (CFPG) support the principles of the LEGA development but challenge the boundary change.

Ferring Conservation Group considers the key diagram in relation to Hangleton Lane and the Worthing Angmering Gap incorrect

Angmering Parish Council queries the legibility of the Key Diagram.

Housebuilders – support modifications which reflect updated strategy position

### **SUGGESTED CHANGES**

No suggested changes– The Key Diagram is indicative and is supported by and should be read in conjunction with the detailed Policy Maps.

## **SUMMARY SHEET**

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
1	Climping Field Protection Group (Mr David Miranda)	1099747	CFPG is supportive of the principles of the LEGA development (EMP SP2) but strongly challenges the boundary change.	ALPMods172
1	Mr C Self	614733	Comments on transport infrastructure e.g. traffic lights, road sign, height restrictions, speed limits etc.	ALPMods8
1	Mr Alan Lovell	871175	Concerns over the A.259 Consultation and other issues as it affects the area west of Littlehampton	ALPMods9
1	Gleeson Developments (Nexus Planning - Adam Ross)	1101497	For the reasons set out in detail in our representations to Policy H SP2c, the Key Diagram should be amended to identify as part of the strategic allocation at Yapton (SD7) land south of Burndell Road, Yapton in addition to the land south west of Yapton.	ALPMods723
1	Mr Lawrence Tebbs	1099765	I do not support the modification Strategic planning should mean taking account of local conditions and placing developments in the best positions not where a land owner has pushed an area of land in front of the planning authority.	ALPMods224
1	mr richard rabbett	1099854	I do not support this. The key diagram is insufficiently clear to show the precise effect upon specific homes, businesses, because there are scant minor roads shown. The imposition of near 4000 homes in the parishes of Pagham and Bersted in highly disproportionate, unsustainable, unjustified and poorly prepared.	ALPMods361
1	Mr Michael Lovell	1097760	No reasonable person looking at the 2017 vs 2014 key diagram alongside the massively increased scale of housing allocation to the west of the district. The key diagram gives a clear indication of how ADC has taken the easy option of land put forward by opportunistic landowners in the area of Bersted and Pagham.. Its an 'out of sight out of mind' approach and as such shows a lack of care and consideration for the people of Pagham and Bersted.	ALPMods209
1	Ferring Conservation Group (Mr Ed Miller)	650122	The Ferring area of the Key Diagram shows part of Hangleton Lane as 'Urban Area' but this is not correct. The whole of the lane is rural. Policy Map 4 shows that is part of the Worthing-Angmering Gap.	ALPMods423
1	Mr David Huntley	1099333	The housing imposition on Pagham is unreasonable and unsustainable. We are loosing valuable farmland, treed hedgerows, streams and wildlife corridors. As these are on land adjoining or near Pagham Harbour SPA and Ramsar site they are valuable supporting habitat for rare overwintering	ALPMods141

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
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1	Mr Colin Hamilton	1093041	The key diagram gives a clear indication of how ADC has simply jumped at the opportunity to take up offers of land by landowners with no regard to burden sharing across the district. The imposition of near 4000 homes in the parishes of Pagham and Bersted in highly disproportionate, unsustainable, unjustified and poorly prepared.	ALPMods42
1	Angmering Parish Council (Mr Rob Martin)	670839	The key diagram is unreadable.	ALPMods771
1	Mr Ian Truin	670117	The 'main modification' is that there is a new map replacing a previous version. The details in any map should be self-standing, defined by the key and linked to specific policies that defined the map content.	ALPMods684
1	Mrs Gill Witt	1099372	This diagram shows clearly that the majority of new development is planned for the west of the Arun region, with very little to the east. The largest area of economic growth appears to be around Littlehampton yet thousands of houses are planned for an area with little local employment, many jobs being seasonal and minimum/living wage rates of pay.	ALPMods183
1	Mr Michael Hampton	1099738	This seems to be contrary to the general policy of maintaining and defining separate urban areas and seeking to avoid an urban sprawl extending from one town to another.	ALPMods211
3	Mr Robert Bean	1099763	From the map it appears that there are only 2 economic growth areas in West Sussex. I don't believe that Bognor and Littlehampton's economic growth is worthy of being highlighted on the map. It is probably only came from the building of the new housing estates, which is just a spike in economic activity, not continual growth.	ALPMods192
3	Mr Ian Truin	670117	Strategic Employment Areas have not been replaced with Strategic Employment Boundaries. They are marked as Strategic Employment Sites.	ALPMods685
4	Mr Ian Truin	670117	Broad Locations for Strategic Growth have not been replaced with new Strategic Site Boundaries. They are marked as Strategic Housing Sites.	ALPMods686

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
4	Mr and Mrs Alan and Margaret Brackley	1102217	Concerns over coalescence between Littlehampton, Climping, Ford and Yapton.	ALPMods882
4	Climping Parish Council (Mrs Val Knight)	1094554	CPC notes that the proposed LEGA boundary on the key diagram extends deep in the gap between Littlehampton and Clymping.	ALPMods516
4	Climping Field Protection Group (Mr David Miranda)	1099747	MM4 CFPG notes that the proposed LEGA boundary on the key diagram extends deep in the gap between Littlehampton and Clymping.	ALPMods178
4	Taylor Wimpey	616832	Support - We support this modification, reflecting the updated strategy position based on the future development growth identified within the Arun District Local Plan.	ALPMods568
4	Mrs Lisa Jackson	1100874	The inclusion of the Yapton site on the key diagram is welcome, however, it does not represent the shape of the site in the way other sites are shown elsewhere in the District. The joint site promoters request that the shape on the diagram is more accurate to the allocation site to avoid any future confusion.	ALPMods588
5	Mr Ian Truin	670117	Safeguarding the Main Road Network said to be updated to reflect policies, but 1. no new policy reference and 2. revised strategy quoted as reason for change. If it is in policies it is policy driven, not strategy driven.	ALPMods688
6	Mr Ian Truin	670117	Comment about the reduction of the strategic gap.	ALPMods696
6	mrs siobhan binyon	1098831	I do not agree with this modification as it does not give due considerations to other possible development areas ie Ford. It appears to ignore ADC previous policy of the 'strategic gap' between Bognor and Chichester.	ALPMods45
6	Mr Thomas Jones	1099779	If gaps between settlements are important then they should not be removed without reviewing other suitable sites that are not so identified. For example Ford Eco town is now in the plan with 1500 houses however it is capable of absorbing much more and has many positive reasons for being the preferred site and has previously been identified as able to take 5000 houses.	ALPMods242
6	Mr David Huntley	1099333	MM 6 We should not be using green field sites for building when there are still brownfield sites available like Ford Aerodrome which could support 5000 houses having good transport links. The A 27, A 269 and the railway.	ALPMods601

<b>MM No.</b>	<b>Full Name</b>	<b>Person ID</b>	<b>Officer Summary</b>	<b>Comment ID No.</b>
6	R Burfoot	1100637	MM6 - proposes amended gaps between settlements by excluding the above strategic sites from the 'strategic gap'. I do not consider this is justified or positively prepared. Better alternatives (eg Ford Eco town) have not been fully considered, and that irreparable damage to the infrastructure and way of life will occur in Pagham/Bersted.	ALPMods555
6	Ms Lynette Gill	614471	Strategic gaps between settlements should be kept. It is possible to do this in Arun as the Ford development which had been better received would not fill the strategic gaps from arundel littlehampton and Bognor. To build in Aldwick/Bersted would seriously damage the strategic gap and be detrimental to wildlife which would no longer have a green corridor	ALPMods472
6	Mr Paul Edwards	1099768	The exclusion of land designated as Strategic Sites from the Gaps between Settlements is not justified and not positively prepared.	ALPMods212

## CHAPTER 6 Sustainable Development

This chapter set the strategic approach to development in Arun by starting with the NPPF policy however in addressing comments from the Inspector and the change to the strategy this section has been modified. As the Inspector wanted clarity about the most appropriate strategy ADC decided that an additional policy setting this out was needed. This consolidates the policies in the plan and sets out what will be archived over the plan period.

### DESCRIPTION OF MAIN CHANGES TO SECTION

MM7 new Policy inserted setting out the overall strategic approach of the Local Plan. Supporting text sets out the context for the policy.

### MAIN MODIFICATIONS IN SECTION

MM7 – New Policy SD SP2 (supporting text added paragraph 6.2.1-6.2.8)

### NUMBER OF REPRESENTATIONS (Who from; Support / oppose; Statutory Consultees)

MM7 – 86 comments

Summary of comments

There were a number of comments from residents who simply opposed the strategy. Where future detail was provided about their opposition to the strategy the reason was due to the loss of agricultural land, loss of strategic gaps and infrastructure issues. An alternative strategy of using brownfield land or the previously rejected new eco town at Ford were suggested as alternatives. A number of residents felt that there was a spatial distribution problem with the strategy with too much development located in the west of the district.

From statutory consultees who commented on this MM there was support but South Downs National Park Authority and the Environment Agency suggested minor word changes. It is thought that these can be accommodated without changing the MM materially.

Comments were received saying that as Bognor was larger than Littlehampton this could be indicated in the policy.

### SUGGESTED CHANGES

Minor wording changes to the new policy that can be accommodated without changing the MM materially. The details of this will be agreed with the SDNP and EA and included in a MoU.

Insert words SD SP1a a) i) ...supports the largest settlement Bognor Regis

<b>MM No.</b>	<b>Full Name</b>	<b>Person ID</b>	<b>Officer Summary</b>	<b>Comment ID No.</b>
7	Mr Robert Bean	1099763	"Deliver all Local Plan Strategic Objectives." - No it doesn't	ALPMods193
7	Ian Moody	1100650	The Main Modifications to the Arun Local Plan that are now proposed are welcomed. The new "Strategic Approach" policy (SD SP1a) is a positive addition as it establishes the broad approach to the location of new development and provides a clear understanding of the over-arching spatial strategy. Other modifications demonstrate a more positive approach to growth and help to respond to recent evidence, particularly the latest household projections data released by the Government.	ALPMods557
7	Mr Colin Hamilton	1093041	The LP has nothing to do with Local Authority or community desires or needs but everything to do with ADC's drive to satisfy a speculative OAN. Further, ADC makes no effort to share the load across the district on an equitable basis, but rather grabs every opportunity provided by selling agents/landowners, in our case largely the Church Commissioners and Langmead. The bigger the plot the better. Target sorted."	ALPMods31
7	Mr Colin Hamilton	1093041	ADC Pol SD SP3 states that the Bognor Regis /Chichester gap should be preserved. These gaps should therefore not be concreted over, particularly when more suitable brownfield sites have not been considered. The absence of the Ford airfield, once considered as suitable for 5000 eco friendly houses has been conveniently ignored, probably because ADC found it unsuitable in 2008. The damage to the environment, ecology and unsuitability of infrastructure is incalculable. It is unjustified and not properly prepared or considered.	ALPMods43
7	South Downs National Park (Lucy Howard)	950808	Arundel is recognised for its very special qualities. However, the strategic approach to development as set out in draft policy SD SP1a states that the spatial strategy to 2031 is to 'enable development that recognises the historic character of the town of Arundel with its historic buildings set at the foot of the South Downs'. Further clarification is requested on the meaning of this statement and what development it is intended to enable.	ALPMods541

<b>MM No.</b>	<b>Full Name</b>	<b>Person ID</b>	<b>Officer Summary</b>	<b>Comment ID No.</b>
7	Mrs linda Skinner	1098296	As I Understand it Policy SD SP1a on sustainable development states the strategic approach should be "to maintain the District's unique character as a coastal location set against the South Downs whilst ensuring the needs of the community are met through sustainable growth and the provision of suitable services". As such this policy does not provide the justification for siting 4000 homes on the isolated western area of Arun in the previously designated green gap on high quality agricultural land which also provides roosting, feeding zones and green corridors for wildlife.	ALPMods154
7	Mr Ian Truin	670117	Chapter 6 as a whole is very assumptive and not evidence based. Thus, we expect to find insightful reasons to preserve some assets and protect the future for residents. Point 6.1.3 suggests but does not bother to define and quantify areas that need to be preserved and protected beyond the plan.	ALPMods693
7	Aldwick Parish Council (Mrs Sue Batey)	861675	The distribution of strategic sites is overwhelmingly to the west of the river Arun and the dispersal of the sites spreading their effects upon numbers of established settlements including Aldwick.	ALPMods499
7	mrs cynthia weeks	1098917	Comment about the amount of development in the strategy and the ability for the roads to cope and says that if the current 3,700 are to go ahead in Pagham and Bersted the roads, traffic control and cycle path need improving before the houses are built.	ALPMods117
7	Pamela Hickey	1098452	Concern about strategy and the infrastructure. Aso does not think that the planned growth is necessary.	ALPMods366
7	Mr Ian Truin	670117	Concerns over the erosion of the character of the area through overdevelopment.	ALPMods699
7	LRM Planning on Behalf of Hallam Land Management Ltd. (Mr Owen Jones)	1095164	Considers the policy and plan sound	ALPMods504
7	CPRE (Mrs Kia Trainor)	1099823	CPRE have fundamental concerns with the plan strategy	ALPMods854

<b>MM No.</b>	<b>Full Name</b>	<b>Person ID</b>	<b>Officer Summary</b>	<b>Comment ID No.</b>
7	Mr Michael Lovell	1097760	Does not support MM7 New Policy SD SP1a Strategic Approach because it is not fair and reasonable and it will not be successful in producing the desired result since it does not mention reasonably protecting existing infrastructure from the long term impacts of these proposed strategic developments.	ALPMods217
7	Mr John Gibson	1099775	Does not support strategy	ALPMods235
7	Ms Lynette Gill	614471	Does not support strategy - The loss of prime grade agricultural land at a time when with a growing population and the unknown effects of Brexit seems unsustainable. Why us prime agricultural land not protected?	ALPMods471
7	Mr Michael Skinner	1099354	Does not support strategy which enables building on agricultural land	ALPMods140
7	Mr gary smith	1098017	Does not support the strategy as the roads cannot cope now so extra traffic will make it much worse	ALPMods24
7	Kanaar	865344	Does not support the strategy due to lack of infrastructure and the local economy.	ALPMods1
7	Mrs Josie Jarvis	1099780	Does not support the strategy.	ALPMods247
7	Mr Michael Fortescue	1100131	I am worried these properties will be bought for holiday homes as many are in this area e.g Pagham seafront, Silverdale Close so money will be going into the local economy.	ALPMods451
7	Mr Derrick Chester	613857	I challenge the description of Littlehampton as 'a civic centre with a harbour town set at the mouth of the River Arun with an expanding marine based economy.' Whilst Littlehampton hosts a District Council it is in the hands of Government whether Littlehampton continues to host a District Council or not. The description however fails to understand one of the most important assets of the Town. A unique seaside holiday resort with sandy beaches and seafront greens. Providing accommodation for visitors, attractions for them to visit and a varied selection of food and drink outlets is vital for the future of our economy.	ALPMods52
7	Mrs Mary Brenton	1101019	I consider the modification is unsound.	ALPMods621
7	Terry Pepper	1100030	I do not support this modification. It is astonishing that ADC seek to impose 4000-4500 houses on the greenfield sites covering Bersted, Pagham etc, which will create flooding and the loss of acres of Grade 1 arable land. It is also undeniable that he roads will not be able to cope with a vast increase in traffic. The governments position is crystal clear BROWNFIELD before GREENFIELD, so please do not use our top quality arable land for housing.	ALPMods412

<b>MM No.</b>	<b>Full Name</b>	<b>Person ID</b>	<b>Officer Summary</b>	<b>Comment ID No.</b>
7	Ms Kirsty Sandbrook	1097789	I do not support this. One of Arun's strategic approach objectives states that there will be "green wedges separating urban areas", so surely planning 2500 homes in Bognor Regis on the strategic gap between Bognor Regis and Chichester will contradict this strategy? Similarly the plan says "high quality agricultural land and environmental assets will be protected", but the 2500 houses planned for Bognor Regis will be built on grade 1 and 2 agricultural farmland which is used for food production. Therefore the land will not be protected and food production will be lost.	ALPMods337
7	Mr Derrick Chester	613857	In despite of the proposed strategic allocations the gaps between settlements are still listed as 'Littlehampton to Middleton on Sea' and 'Arundel to Littlehampton'. It is difficult to see how with development at West Bank and Clymping, and with the North Littlehampton development proceeding, how this is any longer an accurate description. If the policy is to meaningfully protect gaps between settlements then it needs better description and definition. In this respect the Plan is unsound.	ALPMods53
7	Mr Brian Sullivan	871328	In particular, I wish to register my objection to developments in rural areas, totally disregarding Parish Council Neighbourhood Plans.	ALPMods636
7	Mr Colin Hamilton	1093041	IN SUMMARY, the LP has nothing to do with Local Authority or community desires or needs but everything to do with ADC's drive to satisfy a speculative OAN. Further, ADC makes no effort to share the load across the district on an equitable basis, but rather grabs every opportunity provided by selling agents/landowners, in our case largely the Church Commissioners and Langmead. The bigger the plot the better. Target sorted.	ALPMods30
7	Mr David Huntley	1099333	MM 7 The altered strategic housing allocation 2011 - 2031 is unreasonable 150 houses for Pagham in 2014 now raised to 1200 in Pagham and 2500 in land North and west of Bersted i. e. Mainly Pagham again for 2016.	ALPMods603
7	R Burfoot	1100637	MM7 (section 6, para 6.2) provides a 'strategic rationale' for putting large numbers of houses close to Bognor and Littlehampton. It is not positively prepared and so will not be successful in producing the desired result since it does not reasonably protect the existing infrastructure from the long term impacts of these proposed strategic developments.	ALPMods556
7	Mrs Diana Orde	1102048	MM7 directly relates to sustainable developments. The modification is not sound and purports to providing a strategic rationale for putting large numbers of houses close to Bognor Regis. In the 2014 ADC Local Plan we didn't have the encroachment on green areas but we clearly have that on the new 2017 Plan with an in balance with housing allocation for Pagham.	ALPMods840

<b>MM No.</b>	<b>Full Name</b>	<b>Person ID</b>	<b>Officer Summary</b>	<b>Comment ID No.</b>
7	Climping Field Protection Group (Mr David Miranda)	1099747	MM7 Policy SD SP1a section c seeks to maintain the setting of villages in open countryside. CPC supports this. Policy H SP2c unfortunately contradicts it with respect to Clymping and this is also contrary to the adopted Clymping Neighbourhood Plan.	ALPMods163
7	mr giles binyon	1099244	No (major) modification to A259 or B2145 despite extreme amount of housing proposed which will have to use these already congested routes. Developments on the best agricultural land. This plan fails on every other one of Arun's Strategic Objectives.	ALPMods387
7	Mr N Mundy	1101119	No consideration for the impact on the local area and appears to favour the developer rather than the local community. Greenfield/ agricultural sites appear to be targeted for development. These sites are Greenfield for a reason - where is the consideration of the development of the numerous brown field sites?	ALPMods651
7	Mrs Lesley Ford	1099962	Opposed plan as unsustainable and requests that Brownfield sites at Ford before using any Greenfield sites, as recommended by Government policies.	ALPMods382
7	Mr Stephen Lias	928750	Opposes allocation - I have major concerns over traffic levels through the village of Shripney. It is very noticeable the increase since the housing developments at each end of the re-routed A259. What on earth is it going to be like with all the new developments in our area.	ALPMods844
7	Mr Steven Bass	1099105	Opposes amended strategy	ALPMods222
7	Mrs Valda Phillips	1099727	Opposes development on agricultural land and concerns about infrastructure.	ALPMods153
7	Mr Hartley Elder	1099358	Opposes Greater Bognor allocation - Sustainable development. The proposed developments in Pagham and Bognor Regis cannot be sustainable if increased traffic, schooling, medical needs are not fully addressed. The land currently has a high water table and after winter rains has standing water for long periods.	ALPMods226
7	Mr Michael Skinner	1099354	Opposes housing development and loss of prime agricultural land.	ALPMods220
7	mrs cynthia weeks	1098917	Opposes housing development on agricultural land	ALPMods113
7	Mrs Janet	1100159	Opposes strategy	ALPMods470

<b>MM No.</b>	<b>Full Name</b>	<b>Person ID</b>	<b>Officer Summary</b>	<b>Comment ID No.</b>
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7	Mrs Janette Hall	1100127	Opposes strategy - Overloading of houses in these districts are truly abhorrent - as villages the structure for all the buildings of various types is completely unjustified	ALPMods449
7	Mrs linda Skinner	1098296	Opposes strategy , review and reconsider the location and scale of the proposed housing sites.	ALPMods139
7	Mrs Henrietta Kendall	1100158	Opposes strategy and distribution of allocations	ALPMods464
7	Mrs Caroline Vickers	1099845	Opposes strategy because greenfield sites should be chosen over an above large areas of brown field sites in the district.	ALPMods318
7	Mrs Shirley Bass	1099623	Opposes strategy set out in Strategic Approach	ALPMods246
7	Mr and Mrs David and Jackie Ayling	1102061	Opposes the allocation as it is on agricultural land and believes that brownfield land should be used.	ALPMods851
7	Mr Paul Edwards	1099768	Opposes the strategy for the scale and locations of allocations	ALPMods210
7	Mr Mike Lambourne	1099350	Point 6.2.4 appears to be contradicted as you will be building on "...high quality agricultural land and environmental assets will be protected." Point 6.2.6 It would be a little clearer if the statement "New growth will be supported by improvements to the District's transport network and other key infrastructure." Does this mean rail, road and cycle routes? So far the current track record in in this area, is lacking.	ALPMods148
7	Mr Paul James	1100215	Policy SD SP1a appears to be at odds with the Housing Strategic Site Allocations for Climping and Ford. Proposed housing at Climping and Ford will have a detrimental impact on high quality agricultural land and the gap (green wedge) between coastal settlements.	ALPMods490
7	Mr Henry Stamp	874646	Policy SD SP1a doesn't properly reflect the characteristics of Bognor Regis describing it as only a holiday centre and University Campus location.	ALPMods537
7	Clymping Parish Council (Mrs Val Knight)	1094554	Policy SD SP1a section c seeks to maintain the setting of villages in open countryside. CPC supports this. Policy H SP2c unfortunately contradicts it with respect to Clymping and this is also contrary to the adopted Clymping Neighbourhood Plan.	ALPMods517

<b>MM No.</b>	<b>Full Name</b>	<b>Person ID</b>	<b>Officer Summary</b>	<b>Comment ID No.</b>
7	Mr and Mrs Alan and Margaret Brackley	1102217	Policy SD SP1a Section C seeks to maintain the setting of villages in open countryside. This is support this wholeheartedly. Policy H SP2c however, unfortunately contradicts this with respect to Clymping and it is also contrary to the adopted Clymping Neighbourhood Plan.	ALPMods883
7	Mrs Gillian Yeates	676438	Policy SD SP3 states specifically that the Bognor Regis to Chichester gap between settlements will be maintained. However, the current proposal for the West of Bersted site goes right up to the boundary of the Arun and Chichester districts. Therefore, how can this policy be justified? Arun DC would be giving up control over this gap as only Chichester DC will be able to protect it. This is not acceptable.	ALPMods388
7	Mr Albert Homer	1101542	Reconsider using the brownfield and greenfield flood zone 1 sites in the Ford area. There is sufficient area for a settlement of 5000 - 6000 houses which would allow some of the allocations to retain their greenfield status.	ALPMods735
7	Mrs Vicky Hennessy	1101068	SD SP1A which does not mention the districts unique character or provide sufficient protection for high grade farmland which may be needed as population grows. Road/Sewerage networks are already at or near capacity.	ALPMods628
7	Littlehampton Town Council (Mr Peter Herbert)	869431	Suggests a revised description of Littlehampton. - A more accurate definition of Littlehampton might include the following: a unique seaside family resort; a district centre; leisure based marine activity on the River Awn with limited commercial activity; commercial Industrial estates hosting a variety of industries crucial to local employment; a base for exploration of the South Downs.	ALPMods96
7	Environment Agency (Mrs Hannah Hyland)	375337	Supports strategic policy but seeks minor wording changes	ALPMods277
7	Mr Tony Cross	1099216	The absence of a thorough feasibility study for the consideration and inclusion of the area of and around Ford to provide the sustainable development required using greater proportions of brownfield sites is an impediment to the integrity of the overall spatial development contained in the plan, thereby rendering it fundamentally flawed. This situation is compounded given the failures to address deficiencies in the strategic road network - A27, A29 and A259.	ALPMods114

<b>MM No.</b>	<b>Full Name</b>	<b>Person ID</b>	<b>Officer Summary</b>	<b>Comment ID No.</b>
7	Bourne Leisure Ltd	1099192	The Company supports the Council's approach in Policy SDSP1a to maintain the District's unique character as a coastal location set against the South Downs. Bourne Leisure strongly supports point 'a.i' which will promote and enable development that supports Bognor Regis as a holiday centre. Given that this policy explicitly seeks to promote Bognor Regis as a tourist destination, Bourne Leisure considers that the supporting text at Section 6 (paragraphs 6.2.1-6.28), should accordingly refer to the importance of a successful tourism industry to achieving the Local Plan's Strategic Approach. This addition would ensure consistency across the policy and supporting text.	ALPMods105
7	R Burfoot	1100637	The Local Plan is trying to lock in as 'strategic sites' where housing can take place in the future, ie. Sefter, Hook Lane, Pagham Road, and now West Bersted (Chalcraft Lane). This allocation equates to 3,700 new dwellings v the 150 shown in the 2014 Local Plan. What is the justification for this astronomical increase	ALPMods554
7	Persimmon Homes (Craig Hatton)	874715	The Main Modifications table states that a new policy is inserted which sets out the overall strategic approach of the Local Plan. This is taken as being Policy SD SP1a " Strategic Approach. In general, this policy contains positive elements which Persimmon Homes would support. We are pleased that there is an effort to ensure there is growth in the District however there appears to be a reluctance to move away from the central focus on Bognor Regis and Littlehampton. Whilst there is proposed to be development taking place in these locations, Angmering and Barnham-Eastergate-Westergate (BEW) are to be subject to a significant quantum of development. These locations should therefore be considered to be on a par with Littlehampton and Bognor Regis as key drivers of economic growth and deliverers of much needed housing	ALPMods478
7	Mr Michael Skinner	1099354	The National Planning Policy Framework was designed to protect both strategic gaps and prime agricultural land, it appears that the proposed large scale housing developments are being located largely in the West of the area on high quality farmland which are exclusively green field sites. In the area of the proposed development the current infrastructure is nearly able to cope with the traffic conditions as they exist today. Therefore, any such proposals for increased development in the area requires a comprehensive review of a supporting infrastructure plan, which appears lacking at the moment.	ALPMods138
7	Mr Paul Edwards	1099768	The New Policy SD SP1a Strategic Approach is not positively prepared and will not be successful in producing the desired results as it offers no reasonable protection to the existing infrastructure from the long term impacts of these proposed developments.	ALPMods215

<b>MM No.</b>	<b>Full Name</b>	<b>Person ID</b>	<b>Officer Summary</b>	<b>Comment ID No.</b>
7	Mrs Henrietta Kendall	1100158	The plan has not been positively prepared because it has not considered the effects on the infrastructure of the western area of ADC. Most employment is agricultural and building on agricultural land will weaken the industry. Flood protection, sewage provision, traffic congestion and road network integrity will be threatened. Recent loss of A27 improvements will worsen the effects. Also the schools and doctors surgeries will be put under unacceptable pressure . In my experience the provision by doctors surgeries is already under huge pressure to add to this would be unsustainable and result in people who live in the area not getting proper care.	ALPMods465
7	Mr Colin Hamilton	1093041	The proposals contained in this LP are entirely inconsistent with the aims of the Strategic Approach. They do not provide for the needs of the community. They vastly exceed these needs and I can find no evidence that the local needs have been properly considered.	ALPMods27
7	mr richard rabbett	1099854	The Strategic Approach appears to have been paid less than lip service in the implementation of its local plan. I find nothing indicating exactly how Bersted (and Pagham) supposedly expressed desire to be reshaped. Certainly at no time have I received anything seeking my thoughts or opinions. The amount of houses envisaged is clearly far in excess of Bersted and Paghams combined local needs.	ALPMods363
7	Mrs Carol Birch	1099711	The sustainability of this plan does not take enough weight on the importance of preserving our land for food production, nature and open spaces,, especially in the Pagham area. The traffic in the area is already at an unsustainable level.	ALPMods443
7	Sussex Wildlife Trust (Sussex Wildlife Trust (Jess Price)	1100900	The Trust strongly supports the inclusion of objectives to"plan for climate change" and "to work in harmony with the environment to conserve natural resources and increase biodiversity". Therefore we are disappointed to see that these objectives have not helped to shape the Strategic Approach committed to in section 6.2 and Policy SD SP1a.	ALPMods591
7	Bersted PC (Mrs Debbie Holcomber)	1098152	There is a lack of protection for high grade farmland which is a vital resource and already provides employment. This land may be needed to grow food as our population (like the rest of Europe) grows and we leave the EU. As far as employment land is concerned, there is a fear that much will be designated B8 which provides few jobs and these are often low paid. Businesses may not want to relocate to this area due to the poor connectivity of the road network, especially in light of the cancelled A27 improvements at Chichester and the uncertainty over those at Arundel. For Bersted there are sustainability questions around traffic levels, service provision (such as schools, doctors, etc), drainage and flood prevention.	ALPMods127

<b>MM No.</b>	<b>Full Name</b>	<b>Person ID</b>	<b>Officer Summary</b>	<b>Comment ID No.</b>
7	Ms Lynette Gill	614471	There is no strategic rational in building so many houses in Bersted or Aldwick. There is not sufficient employment in the area whic pays sufficiently for people to buy houses in this area. Students will not wish to live so far away from the University. Anyone buying these houses would be likely to work elsewhere and the road system will not support additional traffic towards Chichester, Portsmouth, Worthing or further afield.	ALPMods473
7	Mrs Karen Haddon	1099351	There is not a enough infrastructure in place and Climping as we know it would be gone forever	ALPMods441
7	Mrs Gillian Yeates	676438	There seems to be a huge disconnect in policy from both central and local government as regards protecting high grade productive farmland. Not only does the Arun district contain excellent quality agricultural land, but we benefit from a micro-climate which provides excellent growing conditions. This cannot be replaced once concreted over and a vital resource will be lost for ourselves and future generations.	ALPMods371
7	Bognor Town Council (Sheila Hodgson)	1101605	These comments are reflective of the Bognor Regis Town Council Neighbourhood Plan and the Planning & Licensing Committees SUPPORT policy	ALPMods756
7	Mr Michael Lovell	1097760	These modifications are on such a scale the character of the area will change irrevocably. It is not reasonable in that better alternatives have not been fully considered and the change is clearly just an it is not "consistent with sustainable development" in that irreparable damage to the infrastructure, way of life, natural and built heritage and local employment will occur in Pagham/Bersted.	ALPMods208
7	Mr gary smith	1098017	This is not sustainable development	ALPMods19
7	Mr Thomas Jones	1099779	This policy is not "positively prepared" i.e it is not "reasonable" in that better alternatives have not been fully considered and it is not "consistent with sustainable development" in that irreparable damage to the infrastructure, way of life, natural and built heritage and local employment will occur in Pagham/Bersted.	ALPMods243
7	Mr John T Freeman	614774	This revised plan is completely unsustainable by the Government's own definition. The high levels of additional housing cannot be supported even if specific areas of land are set aside, as the required infrastructure is unlikely to be in place during the period of the plan.	ALPMods643
7	M A Nichols	616291	This strategic approach to the building of 2500 houses on north Bersted on good used farm land is not consistent with the policy to build on brownfield sites i.e. Ford.	ALPMods407

<b>MM No.</b>	<b>Full Name</b>	<b>Person ID</b>	<b>Officer Summary</b>	<b>Comment ID No.</b>
7	Store Property Investments	873483	We strongly support the emphasis given to protecting the key centres in Arun, however, we consider that this policy should also set out the need to protect the important function of smaller centres such as Rustington.	ALPMods562
7	Taylor Wimpey (Barton Willmore - David Bradley)	617137	We support the inclusion of this policy to providing an overarching strategy for development within the District. We consider that the growth of villages, whilst respecting their countryside setting which has been identified within this policy is a positive approach for the delivery of much needed housing within the District.	ALPMods569
7	Gleeson Developments (Nexus Planning - Adam Ross)	1101497	We support the Strategic Approach in Policy SD SP1a which seeks to ensure that the needs of the community are met through sustainable growth in the District. However, as set out in detail in our representations to Policy H SP2c, the strategic allocation at Yapton (SD7) should be increased from at least 400 to at least 500 homes, to include the allocation of land south of Burndell Road in Yapton.	ALPMods724
7	Rydon Homes and Gleeson Developments Ltd	1101252	We welcome Policy SD SP1a Strategic Approach• which seeks to ensure that the needs of the community are met through sustainable growth. In particular, we support criterion c which provides for the growth of sustainable villages. This is an important element of the strategy and recognises the sustainability of sustainable villages such as Angmering that are suitable for strategic scale growth.	ALPMods667
7	Mrs Hayley Bryant	1099964	What can possibly only be understood is that the distribution of housing throughout the district is disproportionate. To impose such a massive number of dwellings on Pagham, Bersted and the surrounding areas is ridiculous.	ALPMods615
7	Yapton Parish Council (Mr Andrew Gardiner)	941764	When considering the ADC Local Plan in full and acknowledging the proposed Strategic housing sites, under policy HSP2c Ford (SD8) of Chapter 12 there is a lack of policy to protect the individual character and identity of Yapton from the threat of urban coalescence with the new proposed settlement at Ford, a direct contradiction of policy SD SP3.	ALPMods539

**CHAPTER**

7 Settlement Structure & Green Infrastructure

**DESCRIPTION OF MAIN CHANGES TO SECTION**

The main changes relating to this section occur to the Landscape part. Policy LAN DM1 was rewritten and minor alteration to Policy C SP1 acknowledging the removal of broad allocations. Complementary to this the gaps shown on the Policies Maps and Key Diagram were revised to remove these where there were strategic allocations

**MAIN MODIFICATIONS IN SECTION**

MM8 – Policy C SP1 removal of broad allocations  
MM9 - Policy LAN DM1 rewritten

Complementary ones

MM6 Key Diagram – amended Gaps Between Settlements

MM66 Policy maps change to the Built Up Area Boundary

MM67 Policy maps Gaps Between Settlements amended around strategic sites

**NUMBER OF REPRESENTATIONS (Who from; Support / oppose; Statutory Consultees)**

There were 20 comments linked to this section from Parish Councils, developers and residents.

4 of these were about the alteration to C SP1, 3 to the Gaps Between Settlements and 17 Policy LAN DM1.

Specifically relating to those comments from the town and parish councils, Bognor Regis and Climping supported the change, where Yapton objected, wishing a new gap to be designated between Yapton and Ford to prevent coalescence. In terms of statutory consultees, South Downs National Park Authority, Ferring Conservation Group and Clymping Field Protection Group also supported the change to LAN DM1.

Two housebuilders commented on each of the Main Modifications of this Chapter. Rydon Homes and Gleeson Developments commented that although they supported MM9 in principle and then were concerned about its practical application in future. Taylor Wimpey simply supports the amendment to C SP1 taking out reference to broad allocations.

Other representations have considered that the wording has been weakened or that there is an inconsistency between what is set out here and strategic allocations and wish a higher figure to be considered at Ford or on brownfield land.

**SUGGESTED CHANGES**

Minor Modification to Policy SD SP2 to ensure consistency of new approach that has removed broad locations, as follows:

“..., apart from the Strategic, and Site Specific ~~and Broad~~ Allocations, development or...”

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
8	mr giles binyon	1099244	"the countryside will be safeguarded fir its own sake" is meaningless. Arun has and is prepared to take wild/semi-wild and top agricultural land for housing. And if the last house gets built before (doubtful) 2031 then once gain it can release itself from protecting the "Built-Up-Area-Boundary" and draw a new boundary. Its officers should have the decency to not patronise the people it serves with such a lot of meaningless words.	ALPMods391
8	Mr Alan Brackley	1102147	Agrees with Policy C SP1.	ALPMods869
8	Clymping Parish Council (Mrs Val Knight)	1094554	CPC agrees with Policy C SP1 as it provides important context to the Clymping Neighbourhood Plan.	ALPMods518
8	Mr and Mrs Alan and Margaret Brackley	1102217	I agree with Policy C SP1 as it provides important context to Clymping Neighbourhood Plan	ALPMods884
8	Taylor Wimpey	616832	We support the removal of this text to reflect that broad allocations have now been incorporated into strategic allocations in line with the Councils updated development strategy.	ALPMods570
9	Mrs cynthia weeks	1098917	ADC are only planning 1,500 houses in Ford compared to the 3,700 Paghams/Bersted development on green fields. In the recent government White Paper on housing, the government call for local authorities to protect the green belt and to only build on this when they can demonstrate they have examined fully other reasonable options including making use of suitable brown field sites. I suggest ADC have not done this.	ALPMods116
9	Mr and Mrs Alan and Margaret Brackley	1102217	Agrees with Policy LAN DM1, and, in particular, the final paragraphs "Development throughout the plan area should respect the particular characteristics and natural features of the relevant landscape character areas and seek, wherever possible to reinforce or repair the character of those areas". It continues "The historic character and development pattern of settlements should be respected taking into account their distinctive identity and setting". This is inconsistent with the proposals in Policy H SP2c that will involve development on Grade 1 and Grade2 farmland contrary to Policy SO DM1 b and c and Policy C SP1.	ALPMods885

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
9	Clymping Parish Council (Mrs Val Knight)	1094554	CPC agrees with Policy LAN DM1, and, in particular, the final paragraphs	ALPMods520
9	Mr Ed Miller	650122	Ferring Conservation Group strongly support this policy as now expressed.	ALPMods432
9	Climping Field Protection Group (Mr David Miranda)	1099747	MM9. CPC agrees with Policy LAN DM1, and, in particular, the final paragraphs "Development throughout the plan area should respect the particular characteristics and natural features of the relevant landscape character areas and seek, wherever possible to reinforce or repair the character of those areas". It continues "The historic character and development pattern of settlements should be respected taking into account their distinctive identity and setting". This is inconsistent with the proposals in H SP2c that will involve development on Grade 1 and Grade 2 farmland contrary to policy SO DM1 b and c and Policy C SP1.	ALPMods164
9	Mr Derrick Chester	613857	Policy LAN DM1 The view from the mouth of the River Arun towards the South Down National Park is simply stunning, but as yet unprotected. I am concerned that the rewording of the policy does not give enough strength to protect and should perhaps protect specific views within the District.	ALPMods54
9	Mr Paul James	1100215	Rewritten Policy LAN DM1 appears to be at odds with the Strategic Site Allocations, in particular SD10 Climping (proposal for 300 dwellings) and SD8 Ford (proposal for 1,500 units). The addition of 1,800 dwellings does not respect the character and development pattern of Climping and Ford and will undermine the gap, at Climping, between coastal settlements. Both Climping and Ford are communities with small populations, which will be drastically altered with the proposed addition of 1,800 homes.	ALPMods488
9	SDNP (Lucy Howard)	950808	SDNP welcome the re-written policy regarding the setting of the South Downs national Park.	ALPMods542
9	Ferring Parish Council (Mrs Nadine Phibbs)	1099050	The modified Arun Local Plan shows that there is protection for the gaps, including Angmering to Worthing. However on the map the protected area excludes the lower part of Hangleton Lane. Clarification is required	ALPMods93
9	Mr Ian Truin	670117	The Policy is bland and unenforceable and should be omitted.	ALPMods702

<b>MM No.</b>	<b>Full Name</b>	<b>Person ID</b>	<b>Officer Summary</b>	<b>Comment ID No.</b>
9	Bognor Town Council (Sheila Hodgson)	1101605	These comments are reflective of the Bognor Regis Town Council Neighbourhood Plan and the Planning & Licensing Committees Note modifications and SUPPORT policy	ALPMods757
9	Mr Michael Lovell	1097760	This policy covers protection of landscape character and has been rewritten to allow developments which no longer are required to (paraphrasing the 2014 wording)	ALPMods219
9	Mrs linda Skinner	1098296	This seems to have been diluted from 'conserve and enhance' to 'respect wherever possible' This implies that the 'particular characteristics and natural features of landscape character areas' may not be conserved, e.g views to the South Downs or Chichester. These are particularly important as they make the area such a popular holiday destination.	ALPMods155
9	Rydon Homes and Gleeson Developments Ltd	1101252	We do not object, in principle, to the provisions of Policy LAN DM1 insofar as they seek to ensure that new development has special regard to the conservation of the setting of the South Downs National Park but comment that it must not be used at the development management stage as a means to delay or frustrate the delivery of much-needed housing on sites identified as appropriate for such development by the Council.	ALPMods669
9	Mr Robert Bean	1099763	Why is protecting the view of Arundel Cathedral important but protecting the view of Chichester Cathedral for Bognorians when the land on Chalcraft Lane is built on is not deemed important?	ALPMods194

## CHAPTER

8 – Employment and Enterprise.

The chapter relates to Economic and enterprise development for employment growth. It covers a number of topic areas including Strategic Economic Growth, Economic Growth Areas, Strategic Employment Land Allocations, Employment Land (Development Management), Enterprise Bognor Regis, and Employment and Skills

## DESCRIPTION OF MAIN CHANGES TO SECTION

The main modifications have been provided to clarify the approach that the council is taking with regards to employment and enterprise matters within the district.

Two policies have been deleted: EMP DM3 (Littlehampton Harbour) and EMP DM4 (Knowledge and Cultural Economic Growth and Regeneration). The information contained within these policies has been transferred to more suitable policies within the plan. From an employment perspective, information is now contained within a new strategic level policy, EMP SP2 (Economic Growth Areas). Residential housing allocation information has been transferred into chapter 12.

The remainder of the changes are related to Duty to Cooperate, current employment evidence base and the NPPF.

## MAIN MODIFICATIONS IN SECTION

MM10: Include a reference to 'cater for the unmet employment needs of neighbouring areas', in order to reflect the latest Duty to Cooperate position.

MM11: Policy EMP SP1 has been rewritten to reflect up to date evidence and clarified strategic approach.

MM12: New policy EMP SP2: 'Economic Growth Areas' to clarify the strategic approach to regeneration. Policies EMP DM3 and EMP DM4 have been deleted.

MM13: New section (8.5) inserted to clarify the strategic approach to regeneration.

MM14: Policy EMP SP2: Strategic Employment Land Allocations. Details of the sites have been amended.

MM15: Various amendments to policy EMP DM1 to ensure compliance with the NPPF.

MM16: Delete section 8.8. The content of the section has been incorporated into New EMP SP2, to reflect the strategic nature of the issue.

MM17: Delete whole of policy EMP DM3. The content of the policy has been incorporated into New EMP SP2, to reflect the strategic nature of the issue.

MM18: Delete section 8.9. The content of the section has been incorporated into New EMP SP2, to reflect the strategic nature of the issue.

MM19: Delete whole of policy EMP DM4. The content of the policy has been incorporated into New EMP SP2, to reflect the strategic nature of the issue

**NUMBER OF REPRESENTATIONS (Who from; Support / oppose; Statutory Consultees)**

62 comments were made on the 10 main modifications to the local plan. These can be identified as follows:

MM10: 6 comments  
MM11: 21 comments  
MM12: 6 comments  
MM13: 7 comments  
MM14: 8 comments  
MM15: 9 comments  
MM16: 0 comments  
MM17: 0 comments  
MM18: 3 comments  
MM19: 2 comments

TOTAL 62 Comments

Comments were made by 7 Town and Parish Councils, East Sussex County Council and the Bognor Regis Regeneration Board. In addition, 2 comments were submitted from the Climping Field Protection Group (CFPG). The comments can be summarised as follows:

Aldingbourne Parish Council: Policy EMP SP1 is an improvement on the previous version

Angmering Parish Council: Comment related to duty to Cooperate, the treatment of the Angmering Strategic employment site (when compared to the other sites), and modification to EMP DM1

Bersted Parish Council. Comment related to Duty to Cooperate and the relationship with commuting. In addition, a comment that the A29 needs to be an effective link between the A259 and the A27.

Bognor Regis Town Council: Support Main modification number 11, 13, and 14.

Clymping Parish Council: The Council is supportive of the principles of the LEGA development (EMP SP2) but strongly challenges the boundary change. In addition the parish council comments that: To deliver the intent of Policy EMP DM1 Para 6, CPC believes it is necessary to define 'modest' and to be able to take into account the cumulative effect of a series of small developments coming forward over the period of the Local Plan.

Littlehampton Town Council: Query regarding two strategic employment allocations, and the amended boundary to LEGA.

East Sussex County Council: The Council welcome the recognition of Railway Wharf as a safeguarded mineral site in the Proposed Modifications and comments that additional work on a SPD should clarify the detail.

Bognor Regis Regeneration Board: the allocated employment land needs to be protected from increased housing need over the period of the plan.

## SUGGESTED CHANGES

### EMP DM1 para 6.

Additional minor amendment to bullet point 'a' from:

a. That it is a modest extension of an existing employment site, or..... and replace with:

a. That it is an appropriate sized modest extension of an existing employment site, or

### EMP SP2

:

Additional minor amendment to insert the following text at the end of paragraph 2

The council will support development of an appropriate scale in other settlements in the District to diversify and enhance the knowledge and cultural based opportunities

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
10	Mr Ian Truin	670117	ADC has no idea of or accountability for the unmet 'employment needs' in neighbouring areas, only housing needs, and has no DTC accountability to meet them Arun District has high levels of out commuting and a low job density because residents are habitually employed in neighbouring and more distant districts. Thus Arun District is already directly meeting neighbouring housing and "non-employment in Arun" needs and any DTC increase addition to Arun's housing target (i.e. 81 pa currently) is double counted and overstated.	ALPMods703
10	Persimmon Homes	874715	Arun's main issue concerns the lack of housing and this issue needs to be addressed as a priority in the Local Plan. It is important that Arun identifies its employment needs and seeks to meet these however it will be difficult to meet those of other neighbouring authorities. Arun's own employment needs will be challenging to meet in full and there is likely to be a conflict between employment and housing in the District. The Council should be seeking to re-use unoccupied employment sites across the District as a key part of the employment strategy.	ALPMods479
10	Mrs Gillian Yeates	676438	How can the Arun district possibly support unmet employment needs of neighbouring areas without major improvements to the road network, over and above what is currently being suggested.	ALPMods373
10	Angmering Parish Council (Mr Rob Martin)	670839	The duty to cooperate does not mean a duty to give in. The only priority for Arun is to provide jobs for its own area not to employ people from surrounding areas	ALPMods772
10	Bersted Parish Council (Mrs Debbie Holcombe)	1098152	The Duty to Cooperate with regard to employment as well as housing will potentially either cause an increase in the need for both in the Arun area or a large rise in out-commuting/in-commuting. For example, if residents of adjacent districts in-commute, this will have an adverse effect on jobs for Arun residents as well add to traffic congestion.	ALPMods128
10	mr giles binyon	1099244	There is only a small proportion of the overall employment sites falling within the higher risk flood extents but the possible use is considered less vulnerable and so more acceptable plus importantly point c of policy EMP DM2 specifically refers to the need for any application to address "appropriate flood mitigation works".	ALPMods392
11	Rydon Homes and Gleeson Developments Ltd	1101252	Amend criterion b. to delete reference to Angmering. Amend criterion d. to state "The provision of on-site employment, where appropriate, within strategic housing developments"	ALPMods670

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
11	Bourne Leisure Ltd (Ms Margaret Baddeley)	614858	Bourne Leisure supports the proposed re-wording of Policy EMP SP1 to clarify the Council's strategic approach to economic growth.	ALPMods262
11	Climping Field Protection Group (Mr David Miranda)	1099747	CFPG supports Policy EMP DM1 10 and sections 10 c, 10e and 10f in particular. (This is related to the rewritten employment Policy)	ALPMods177
11	Mr Ian Truin	670117	Does not support the change to policy wording and wishes to revert to the original.	ALPMods704
11	Mrs Jane Richardson	1099739	Does not understand why we have to meet the needs of others employment needs. Considers Ford a more sustainable location.	ALPMods307
11	Mr Derrick Chester	613857	Employment comment various observations.	ALPMods58
11	East Sussex County Council (Mr Edward Sheath)	1099007	ESCC - welcome the recognition of Railway Wharf as a safeguarded mineral site in the Proposed Modifications and comments that additional work on a SPD should clarify the detail.	ALPMods51
11	c/o Serena Page @ dwdllp Store Property Investments	873483	Focus on promoting regeneration of the Districts town centres is welcomed in order to sustain the health and viability of the centres. However the focus on only the highest order centres is not a sound approach and ignores the important role that smaller centres play in the retail hierarchy.	ALPMods563
11	Mr John T Freeman	614774	Having now read and considered all the modifications to the proposed ADC Local Plan, I can only conclude that all the changes have been imposed by the Planning Inspectorate. They obviously have no knowledge of local conditions and are operating in complete isolation from the rest of the U.K. Government. It is all very well considering only land usage but where are the doctors, teachers, hospitals, roads, water and waste disposal resources coming from. What support will ADC be receiving from neighbouring councils• who do not have space or employment needs (para 8.1.1 & para 3.35).	ALPMods642

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
11	Mr Henry Stamp	874646	I think the currently drafted policy is not Positively Prepared enough in terms or providing for employment land/premises and services in the most sustainable manner, and thus is not Consistent with National Policy. It is also not the most appropriate strategy as currently drafted and therefore not Justified. Suggested proposed changes that they feel would make the policy more Deliverable and Effective.	ALPMods534
11	Bognor Regis Regeneration Board (Mr David Myers)	699962	It is important that employment initiatives are robust to assist in transforming Bognor Regis from a dormitory town to a local economy that provides sustainable employment opportunities for its residents. To safeguard this objective the employment land identified in the Local Plan does need to be protected from an increased housing need over the period of the Plan.	ALPMods547
11	Mr Robert Bean	1099763	Opposes Greater Bognor allocation - Building thousands of homes in Bognor will make out commuting worse not better. The proposed improvements to the A29 fall short of reaching the A259 so would not improve things for people coming into/leaving Bognor.	ALPMods195
11	Mr Raymond Radmall	1101559	Opposes the Greater Bognor allocation as it will have an adverse effect on the holiday park at Church Lane - Haven holidays.	ALPMods746
11	Littlehampton Townh Council (Mr Peter Herbert)	869431	P74 - Policy EMP SP1 promotes District centres as the focus for retail, office and leisure especially in Littlehampton and Bognor Regis which would be totally supported by the Town Council. However, when it comes to policy EMP SP3 (P85) the strategic employment land allocations for Courtwick and North Littlehampton have been removed. Why? It would seem important to identify strategic employment land in Littlehampton given the amount of housing development particularly given the degree of detail provided (Policy EMP DM2) for enterprise in Bognor Regis	ALPMods98
11	Mr Gordon Bell	873326	Policy EMP DM4 covered "Knowledge and cultural based economic growth and regeneration" Despite a well-accepted shortage of employment skills in the Arun workforce and a well-accepted shortage of skilled employment in the district, I can find little or no mention of the subjects covered by EMP DM4 in EMP DM2.	ALPMods323
11	Mr Raymond Radmall	1101559	Supports the employment policy but not the loss of land for strategic allocation at Greater Bognor due to its effect on the existing tourism employment.	ALPMods743
11	Aldingbourne Parish Council (Mrs Joanne Brown)	1100287	The business space land supply policy to strengthen the economy is an improvement on the previous version of the LP.	ALPMods512

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
11	Mr Michael Hampton	1099738	The Employment changes are minimal and in no way support the requirement proposed for immense amount of new housing.	ALPMods160
11	Mrs linda Skinner	1098296	The infrastructure improvements mentioned are likely to be A29 realignment, but as this does not reach the A259 directly it will not be effective for businesses located in the Bognor area.	ALPMods156
11	Bogonr Regis Town Council (Sheila Hodgson)	1101605	These comments are reflective of the Bognor Regis Town Council Neighbourhood Plan and the Planning & Licensing Committees Note modifications and SUPPORT	ALPMods758
11	Mr Ian Francis	1099758	This plan does not follow a logical approach. Lack of capacity in the infrastructure, both local and in Chichester will not support any additional projected employment. With Ford benefiting from the additional capacity provided by the plans for the Arundel Bypass this makes Ford a far better location for development.	ALPMods255
12	Mr Derrick Chester	613857	Employment comment various observations.	ALPMods59
12	Mr Steven Bass	1099105	I submit therefore that the new strategic policy proposed in the Local Plan is definitely NOT Justified, NOT Effective, NOT Positively Prepared and NOT consistent with sustainable development i.e. National Policy. No account has been taken on the need for this quantity of housing when the patently there is little scope for local job growth when the nature of Bognor's typical job opportunities is low paid, the majority of which is seasonal with wages much lower than the average for Arun. These people therefore won't be able to afford the proposed houses and neither will they want to spend their meagre wages on commuting.	ALPMods223
12	Hallam Land Management Limited (Ms Ruth McKeown)	615914	Our principal concern is to ensure that there are appropriate mechanisms in place to draw together the different strands of policy which are relevant to this regeneration proposal and our position therefore remains unchanged in terms of seeking a commitment to an Area Action Plan, which will provide the necessary framework to ensure that these proposals are both planned and delivered comprehensively.	ALPMods558

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
12	Bourne Leisure Ltd	1099192	supports para 89.1 of the supporting text which identifies Butlins Holiday Park as being located within the designated Bognor Regis Economic Growth Area (EGA). Bourne Leisure supports Policy EMP SP2 and particularly endorses the following statements on leisure and tourism in the Area: "Knowledge and cultural based employment including retail leisure and office developments will be directed to the Economic Growth Areas to promote vitality, viability and regeneration. And Development which promotes The establishment of a cluster of creative and digital start-ups in Bognor Regis will be supported, as will improvements to tourist accommodation and facilities".•	ALPMods828
12	Mr Henry Stamp	874646	The introduction of new policy EMP SP2 is welcome, but as may often happen with a new policy it needs some changes in policy text which are suggested.	ALPMods535
12	Mr Ian Truin	670117	This is in conflict with other developments that are acceptable in other areas. This Policy is not one of 'direction' but 'encouragement' and needs rewriting. Rewrite the policy or remove "directed" and replace with 'encouraged'.	ALPMods705
13	Mr Robert Bean	1099763	8.5.24 We haven't been asked if we actually want these houses	ALPMods196
13	Mr Mike Lambourne	1099350	Policy references are confusing	ALPMods149
13	Ferring Parish Council (Mrs Nadine Phibbs)	1099050	The modified Arun Local Plan refers to European standards on several occasions including sections Economic Base, Enterprise Partnerships, Employment & Enterprise and Sites of Biodiversity & Geological Importance. Is this still applicable since the UK referendum in June 2016. Clarification is required	ALPMods91
13	mr giles binyon	1099244	The only infrastructure improvements to benefit the purposes of EBR is the re-alignment of A29. The roads are already struggling to cope now. After large scale house building starts, this improvement (which doesn't completely connect to the A27 from the new road) will not be enough to entice business to locate in the EBR area.	ALPMods394
13	Mr gary smith	1098017	There isn't enough jobs in the area so having more people won't help. - no change required	ALPMods20
13	Bognor Regis Town Council (Sheila)	1101605	These comments are reflective of the Bognor Regis Town Council Neighbourhood Plan and the Planning & Licensing Committees SUPPORT	ALPMods759

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
	Hodgson)			
13	Bersted Parish Council (Mrs Debbie Holcombe)	1098152	To be able to attract genuinely high quality employers and higher grade jobs to the Bognor Regis area, the A29 needs to be an effective link between the A27 and the A259.	ALPMods129
14	Angmering Parish Council (Mr Rob Martin)	670839	Angmering is treated differently from the other two strategic employment areas. The reasons should be explicitly explained	ALPMods773
14	Climping Field Protection Group (Mr David Miranda)	1099747	CGPF is supportive of the principles of the LEGA development (EMP SP2) but strongly challenges the boundary change.	ALPMods166
14	Clymping Parish Council (Mrs Val Knight)	1094554	CPC is supportive of the principles of the LEGA development (EMP SP2) but strongly challenges the boundary change.	ALPMods521
14	Mr and Mrs Alan and Margaret Brackley	1102217	I am supportive of the principles of the LEGA development (EMP SP2) but strongly challenge the boundary change.	ALPMods886
14	c/o Serena Page @ dwdllp Store Property Invesments	873483	It is possible that there are other sites that are more appropriate for redevelopment and we consider that identifying just two sites as a priority for the Local Plan does not provide enough flexibility to ensure that the employment needs of the District are met. The Local Plan should identify additional Economic Growth Areas based on the sites that have been submitted to the Council for consideration.	ALPMods564

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
14	Littlehampton Townh Council (Mr Peter Herbert)	869431	Policy on EMP SP2 LEGA remains unchanged and sets out details of what the scheme is required to contribute. For example, enhanced crossing from West to East. Hotel, new marina berthings, respecting Rope Walk heritage etc. However, this provides the criteria for the economic development of the harbour previously covered by Littlehampton Harbour Policy (EMP DM3) which has been deleted. Although the housing policy for West Bank (Policy H SP2b) proposes to accord with EMP SP2 this is the only indication that the LEGA boundary covers a much wider area i.e the town centre and West Bank than that suggested within the policy.	ALPMods99
14	Rydon Homes and Gleeson Developments Ltd	1101252	Summary / Conclusion We understand the Council's desire to deliver economic growth and to be proactive. This approach is supported by the Framework. However, the allocation of a Strategic Employment Site in excess of 8 hectares at Angmerging is simply unrealistic and undeliverable. As a consequence, it would sterilise the use of this land unnecessarily and, at the same time, undermine the Council's own Strategic Site Allocation (SD9) which is simply not large enough to accommodate at least 800 homes and 8 hectares of employment. There is clearly no realistic prospect of this employment development coming forward (it is common ground that there is no quantative need for it and it is not viable now or in the foreseeable future). Paragraph 22 of the Framework is clear that, in such circumstances, alternative uses should be considered having regard to market signals and the need for other uses. Whilst there is demonstrably no quantitative need for employment, there is a very substantial need for housing in the District, and the Council is not proposing to meet this need in full in the first 10 years of the Plan period. Furthermore, and more specifically, Strategic Site Allocation SD9 is simply not large enough to accommodate at least 800 much-needed houses and 8 hectares of employment land (that is neither required nor viable).	ALPMods671
14	Bogonr Regis Town Council (Sheila Hodgson)	1101605	These comments are reflective of the Bognor Regis Town Council Neighbourhood Plan and the Planning & Licensing Committees SUPPORT policy	ALPMods760
15	Mr David Miranda	1099747	CFPG feels that to deliver the intent of Policy EMP DM1 Para 6, it is necessary to define modest• to take account of the cumulative effect of a series of small developments.	ALPMods167

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
15	Trevor Moody	677657	Discusses part 6 of policy regarding outside the Built-Up Area Boundary, including modification to criteria a and h (see attached document). Although the title of this part of the policy refers to economic growth• , the opening paragraph makes no reference to the type of development for which planning permission will be granted. Goes on to recommend another amendment in attached document	ALPMods611
15	Mr and Mrs Alan and Margaret Brackley	1102217	I feel that to deliver the intent of Policy EMP DM1 Para 6, it is necessary to define "modest" to take account of the cumulative effect of a series of small developments. Goes on to recommend amendment below. With the amendment suggested in mind, I object to the inclusion of development land in the HELAA south of the A259 within the Gap between Littlehampton and Middleton contrary to EMP DM1 6h and Policy SD SP3 "Gaps Between Settlements" I support Policy EMP DM1 10 and sections c, 10e and 10f in particular	ALPMods887
15	Persimmon Homes	874715	Persimmon Homes support the re-use of existing employment sites across Arun District in the first instance when looking to accommodate new employment opportunities. The Arun Employment Land Needs Update (2016) states Arun would have sufficient employment space overall, in quantitative terms, up to 2031 to meet the needs arising from the four of the scenarios of future requirements. Therefore this, coupled with the sites identified through the strategic employment allocations, should be deemed suitable to allow for sufficient employment space to ensure growth in the local economy.	ALPMods483
15	James Baird	678037	Requests changes to EMP DM1 part (h) to improve flexibility.	ALPMods612
15	Angmering Parish Council (Mr Rob Martin)	670839	The modification takes out Policy 2b which is precisely the one that it is envisaged would be necessary for the current employment sites in Angmering being promoted for development and Policy 2b should be reinstated	ALPMods774
15	Mr Damian Sullivan	900897	This is in respect to Part 6 of the policy which states that planning permission will be granted on sites outside the built-up area, provided that the proposal demonstrates that certain criteria are met (a-j). The term 'modest' should be removed as this term is imprecise and is unduly restrictive on development coming forward. The word 'modest' would be open to wide interpretation and dispute. As such, the policy has not been positively prepared and would not be effective	ALPMods609
15	Clymping Parish Council (Mrs Val Knight)	1094554	To deliver the intent of Policy EMP DM1 Para 6, CPC believes it is necessary to define 'modest'• and to be able to take into account the cumulative effect of a series of small developments coming forward over the period of the Local Plan.	ALPMods522

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
15	Mr Raymond Radmall	1101559	We support these policy commitments. Almost 90% of employment @ Pagham is provided by Barfoots of Botley and Haven Holidays. The loss of best quality land currently leased by Barfoots will have a serious effect upon their business which could easily impact upon their current (in excess of 1200 personnel) employment. The 3 major development sites @ Pagham proposed for "strategic development" have been under their crop cultivation for the previous 7 years.	ALPMods744
18	Mr Stephen Lias	928750	Although Shripney village is part of the Bersted Parish Council, it has been separated by an agricultural green belt. By developing the land south of Shripney into an Industrial Estate, you are not only setting a precedent by placing industrial units north of the A259, but are putting it on grade 1 agricultural land. Is this not against policy SD SP3 (page 57 local plan).	ALPMods846
18	Mr Colin Hamilton	1093041	One of ADC aims is to reduce out-commuting. AD already has incurred a penalty because adjacent areas cannot meet their housing need, Why AD, with half its area being National Park, should pick up additional targets is not clear. Why additional house aids other areas employment targets when we have a dearth of employment opportunity which is exacerbated by poor road network and impasse over Chi bypass, is inexplicable, Once again, the improvements in Arundel bypass make Ford a much more sustainable development.	ALPMods44
18	Rydon Homes and Gleeson Developments Ltd	1101252	The Key Diagram should be amended to delete the Strategic Employment Allocation at Angmering North. If not deleted, it should identify a considerably smaller area of employment land.	ALPMods666
19	Bourne Leisure Ltd	1099192	supports the deletion of Policy EMP DM4 and its incorporation into New EMP SP2 to reflect the importance of strategic economic growth. However, the Company objects to the deletion of the following statement (as underlined), previously included in Policy EMP DM4 and the failure to replace it in any alternative EMP policy "The priority centres for the promotion of these sectors are a. Littlehampton Economic Growth Area; and b. Bognor Regis Economic Growth Area The council will support development of an appropriate scale in other settlements in the District to diversify and enhance the knowledge and cultural based opportunities"	ALPMods829
19	Mr Gordon Bell	873326	The district desperately needs the development identified in EMP DM4 including the collaboration with the local universities, which appears to have been lost in the modified plan.	ALPMods324

## **Chapter 12 – Housing Delivery**

The chapter sets out the housing strategy for the plan. It identifies the housing trajectory, housing supply, and strategic housing allocations. In addition, it covers affordable housing provision, Traveller accommodation, housing mix, along with Agricultural, forestry & horticultural workers' dwellings.

### **DESCRIPTION OF MAIN CHANGES TO SECTION**

Main modifications have been made to the chapter which cover the following:

Rewrite whole of section 12.1 to set out the housing strategy including the identification of a new OAN of 919 dwellings per year

Insert new policy Housing Allocation which sets out a housing target of 20,000 new homes over the plan period with phased delivery targets.

Separate original policy H SP1 as new Strategic Site Allocations policy that sets out an overarching policy that applies to strategic housing sites.

Separate original policy H SP1 new Strategic Site policies for the Greater Bognor Regis Area, Greater Littlehampton Urban Area, and what is termed as 'inland settlements'. The policies set out the key design and infrastructure requirements for the housing allocations in those areas

Re-write policy/information related to affordable housing, updated information related to Independent living and care homes, along with text related to Gypsy and Traveller pitches.

### **MAIN MODIFICATIONS IN SECTION**

MM20: Rewrite whole of section 12.1 to set out the housing strategy including the identification of a new OAN of 919 dwellings per year

MM21: Insert new policy Housing Allocation which sets out a housing target of 20,000 new homes over the plan period with phased delivery targets.

MM22: Separate original policy H SP1 as new Strategic Site Allocations policy that sets out an overarching policy that applies to strategic housing sites

MM23: Separate original policy H SP1 as new Strategic Site policy for the Greater Bognor Regis Area that sets out the key design and infrastructure requirements for the housing allocations in this area

MM24: Separate original policy H SP1 as new Strategic Site policy for the Greater Littlehampton Urban Area that sets out the key design and infrastructure requirements for the housing allocations in this area

MM25: Separate original policy H SP1 as new Strategic Site policy for the Inland Settlements that sets out the key design and infrastructure requirements for the housing allocations in this area

MM26: Amend the references to affordable housing thresholds

MM27: Rewritten Affordable Housing Policy which now requires affordable housing for

developments of 11 units and above with amended tenure mix and dwelling mix

MM28: Include the following text to policy H DM2 'The scheme is located within the Built Up Area Boundary if it is a new facility.'

MM29: New text 12.7.5 related to Gypsy and Travellers pitches.

**NUMBER OF REPRESENTATIONS (Who from; Support / oppose; Statutory Consultees)**

A total of 381 comments have been made on the chapter. Comments have been divided up according to the main modification:

MM20: 41  
MM21: 33  
MM22: 18  
MM23: 167  
MM24: 8  
MM25: 105  
MM26: 1  
MM27: 5  
MM28: 2  
MM29: 1

The following comments have been submitted by Key Stakeholders:

Aldingbourne Parish Council:

The housing figures appear unsustainable. The original OAN allowed for environmental constraints to reduce the housing target but this does not appear to have been done with the revised figure.

The parish Council ask if Arun's Strategic Objective for Housing restricts the sale of new housing to local residents.

The policies to ensure green space and community facilities are delivered are improved and while we remain opposed to the BEW Strategic allocation as being too large for the villages we welcome the commitments in Policy H SP2, particularly those relating to the enhancement of the natural environment, landscapes and biodiversity, to extend, enhance and reinforce strategic green infrastructure and publicly accessible open space, connectivity of transport modes.

The parish particularly welcomes points a) and d) of Policy H SP2c (BEW SD5) which provide for retaining the unique character and separation of the 3 villages and a Linear Park following the Lidsey Rife. This has the potential to conform with the designation of the Biodiversity corridor East of Westergate in the Aldingbourne Neighbourhood Plan.

Angmering Parish Council:

Given the significant increase in OAN numbers, it is wrong to take what has in effect turned out to be a complete re-write of the Plan, through the Consultation process for modification. Even the Policies that stay the same between versions have a different effect when the delivery of housing over the Plan period is increased from 580 to 1,000+dpa.

Too much emphasis on providing for the OAN with apparently no challenge, including accepting 81 homes per annum under the Duty to Cooperate.

The Strategic site East of Roundstone Lane is already being delivered as part of the EiP version of the Local Plan. The site has been excluded from the scope of testing of key documents. This has resulted in gaps and inconsistencies in the data and recommendations being put forward for additional Strategic development at Angmering North.

The Plan proposes more than doubling the number of dwellings being delivered by the existing Angmering Strategic sites, but 'inadvertently ignores' the Masterplan and status of the existing Strategic site and as a result risks underestimating the impact on existing and future infrastructure requirements through 'creative accounting'.

The small sites letter does more than allocate the sites. It analyses where strategic sites have been allocated and makes suggested changes. It also suggests drawing up a Masterplan, linked to the previous one that looks at the delivering all suggested sites and then infrastructure to go with them.

The plan contains one site in Angmering that should not be Strategic and a further one that should replace it.

The policy does not include any policy for affordable delivery of care facilities. This is an area of dire need. These are being introduced as expensive option only available to a few.

#### Bersted Parish Council:

There are questions regarding the underlying figures in the OAN. The Arun district is known to have relatively poorly paid employment which puts the purchase of housing beyond the reach of many young people. However, the house prices can also be seen as relatively inexpensive to people from better paid areas and this is contributing further towards out-commuting. The UK's decision to leave the EU may also reduce the overall number of new homes required.

Comment about the housing allocation and concerns about infrastructure. Housing numbers need to reflect true 'need' and be sustainable. There should be a reallocation across the region to ensure that infrastructure provision keeps pace with the escalating housing numbers.

Largescale housing development is predominantly on the western side of the district which is unbalanced, particularly in the light of the Duty to Cooperate. Comments are also made with respect of significant negative impact upon residential amenity, and traffic concerns.

#### Bognor Regis Town Council:

Bognor Regis Town Council (BRTC) fully supports Affordable Housing and welcomes the amendments. However they would seek clarification on what could be considered "non-viable". To avoid any loop holes BRTC hope the local planning authority will implement a robust stance.

#### Clymping Parish Council:

Paragraph 12.1.1 is at odds with the definition of Clymping as a small village with very limited services and facilities described in Paragraph 3.9. It is inconsistent with the Vision in Paragraph 4.18 for a small village with regards to retention of character with limited new development to meet local needs. Strategic allocation SD10 virtually doubles the size of the existing village and we object to this because it is contrary to our Neighbourhood Plan, it would completely change the character and rural setting of the village, and would result in a loss of Grade 1 and Grade 2 farmland.

Clymping Parish Council considers that it is unclear how H SP2 b, c, d, j and m are consistent with H SP2c with regards Clymping. CPC have already objected to planning application CM/1/17/OUT as this is inconsistent with the adopted Clymping Neighbourhood Plan.

East Preston:

East Preston Parish Council objects to Angmering Parish Council's proposal for housing to be built on Roundstone Farm land.

Ferring parish Council:

The parish raise an inconsistency between the Local Plan and a site identified within the HELAA

Kingston Parish Council:

Kingston Parish Council (KPC) strongly opposes proposal for strategic housing to be built on Site 154a, a large proportion of which lies within the Parish of Kingston.

Littlehampton Town Council:

The town has a strategic allocation of 1.000 dwellings and there is likely to be a further obligation to increase the parish. The Town Council has resolved to review its Neighbourhood Plan once a Local Plan is in place and once the mechanism for doing so has been clarified by Government.

The Town Council is yet to be wholly convinced that with the level of infrastructure required and no MOU in place between interested parties/landowners, whether LEGA is truly viable. Equally with regard to the Ford allocation of 1,500 whether this number is really enough to deliver the kind of infrastructure improvements necessary. They think that there should also be joined up thinking between proposal sites such as Ford.

Pagham Parish Council:

Pagham Parish Council strongly objects to the Strategic Allocation of sites for major development on the rural fringes of Pagham as specified in Section 12.1.11. The proposed development represents a massive departure from the allocations in the original Local Plan and is clearly in direct conflict with some key objectives and policies identified elsewhere in the plan.

Walberton Parish Council: Question the housing supply paragraphs, especially the section which deals with the housing numbers related to the Neighbourhood Plans.

Chichester District Council:

Although CDC recognises the joint working about cross boundary issues that have taken place, there are still concerns of the cumulative impact of developments on the A27 at Chichester. See WSCC comments and suggested changes in Transport Chapter.

Environment Agency:

The Environment Agency (EA) state that Overall they support this policy and are pleased to see that for each of the allocation sites there are key requirements.

The EA have provided comments in respect of Policy H SP2c – Inland Arun. The comment specifically relates to Barnham/Eastergate/Westergate (SD5). They raise technical points relating to drainage in the Aldingbourne and Lidsey catchments having an impact on water quality, as well as flooding issues and wastewater infrastructure needs (BEW). The EA Goes on to recommend amendments covering potential additions to the policy and supporting text.

The EA have also provided comments in respect of Policy H SP2b – Greater Littlehampton

urban Area. The comment specifically relates to 'Littlehampton – West Bank (SD4)'. The EA talks of working with the Council over the suspension period and up to the resumed hearings, they also confirm that the evidence base is robust and the distinct delivery issues associated with the site and how they can be overcome. The EA comments recognise that the reclassification of the Littlehampton West Bank site does not fall within an area classified as "functional floodplain". The EA are therefore supportive of the site being reclassified from Flood Zone 3b to Flood Zone 3a. They raise some points of presentation as the document is currently drafted. In addition, they are glad to see an SPD is to be produced for the location and will continue to work on this with the Council.

#### West Sussex County Council

West Sussex County Council (WSSCC) notes the amended housing allocations. The Infrastructure to deliver the sites should be identified in policies or the IDP.

The County Council have also provided comments with respect to Barnham/ Eastergate / Westergate, Fontwell, Ford and Climping in respect of Mineral and Waster Safeguarding Areas, transport and infrastructure.

#### Sport England:

Sport England note that the Local Plan has allocated land for playing pitches where appropriate within the housing allocations, broadly in line with their previous request that the plan explicitly states what sports provision is needed to accommodate the increased population putting an increased demand on existing facilities.

However, Sport England would strongly encourage the council to qualify this further, either by allocating a specific amount of land for playing pitches and ancillary facilities within each appropriate site, or by specifying what size these pitches are expected to be (in accordance with Sport England guidance). This will avoid sites coming forward with pitches that are too small, and will ensure that pitches come forward in line with the requirements outlined in the PPS.

#### Climping Field Protection Group:

Climping Field Protection Group (CPFG) opposes Climping allocation.

MM21. Paragraph 12.1.1 is at odds with the definition of Climping as a small village with very limited services and facilities (3.9). It is inconsistent with the Vision in 4.18 for a small village with regards retention of character with limited new development to local needs. Strategic allocation SD10 virtually doubles the size of the existing village.

Within Policy H SP 2b it is important to note the extent to which the proposed LEGA boundary lies in Climping. CPFG is unaware of any improvements to the A259 proposed between Littlehampton and Climping. 1000 new homes and new businesses will inevitably worsen peak traffic issues.

It is unclear how H SP2 b, c, d, j and m are consistent with H SP2c with regards Climping. CPFG have already objected to planning application CM/1/17/OUT as this is inconsistent with the adopted Climping Neighbourhood Plan. This planning application would also be inconsistent with Policy H SP2 b, c, d, j.

#### CPRE:

CPRE are concerned that the housing trajectory is not realistic. House-builders will not deliver more houses than can be sold at an acceptable-to-them profit and they will adjust build rates either up or down in response to market demand as they did during the financial crisis and the 'credit crunch' when build rates were much reduced.

The public:

The public raise various comments/concerns and objections to the strategic sites. In doing so concerns related to transport and infrastructure are raised.

Developers:

Various developers have provided comments as part of the consultation, including supporting section 12.1, support for the revised OAN, the inclusion of specific sites, the promotion of additional sites, concern that the plan as currently devised will provide a 5-year supply of housing land plus the appropriate 20% buffer over the plan period, a suggested increase in the number of units in Yapton to reflect an additional site, considers the OAN cannot be met and suggests an alternative site for consideration. In addition, the use of a stepped trajectory where it is demonstrably the case that higher levels of housing delivery cannot be secured in the early years of the Plan period is accepted.

Specific comments have been made with regard to the school in Angmering as well as specific wording of the policies.

**Summary**

Town and parish councils raise concerns/issues/objections to the Objectively Assessed Need. Various comments are raised with regard to the strategic sites.

Littlehampton Town Council has raised concerns regarding the West Bank allocation.

Opposition is raised from two parish councils with regard to site promoted by another Parish council. Affordable housing policy is supported.

The developers who have submitted comments to the consultation are generally supportive of the modifications, but raise a number of specific concerns. The EA are supportive of the policy approach. In addition, they raise technical points relating to drainage in the Aldingbourne and Lidsey catchments having an impact on water quality, as well as flooding issues and wastewater infrastructure needs (Policy H SP2c – Inland Arun: Barnham/ Eastergate/ Westergate (SD5). Comments have been provided in respect of Policy H SP2b – Greater Littlehampton urban Area. The comment specifically relates to ‘Littlehampton – West Bank (SD4)’ in respect to flood risk. The EA goes on to recommend amendments covering potential additions to the policy and supporting text.

Chichester District Council raised concerns of the cumulative impact of developments on the A27 at Chichester.

West Sussex County Council notes the amended housing allocations. They state that infrastructure to deliver the sites should be identified in policies or the IDP.

The County Council have also provided comments with respect to Barnham/ Eastergate / Westergate, Fontwell, Ford and Climping in respect of Mineral and waster Safeguarding Areas, transport and infrastructure.

Sport England note that the Local Plan has allocated land for playing pitches where appropriate within the housing allocations. However, they strongly encourage the council to qualify this further, either by allocating a specific amount of land required, or by specifying what size these pitches are expected to be.

Local communities, the CPRE and the Climping Field Protection Group oppose strategic sites and raise concerns regarding infrastructure and the housing trajectory.

## **SUGGESTED CHANGES**

### Chichester District Council Comments:

Further evidence base work has been commissioned related to the comments submitted by Chichester District Council.

### Policy H SP2c – Inland Arun: Barnham/Eastergate/Westergate (SD5):

In respect to the comment related to surface water (Environment Agency), the Council suggest that a new point 'e' is created under Policy H SP2c – Barnham/Eastergate/Westergate (SD5). The suggested wording is as follows:

"A comprehensive strategy for surface water management will be developed in line with specific recommendations for this locality, in the Arun Strategic Surface Water Management Study."

The subsequent points shall be renamed:

### Policy H SP2b – Greater Littlehampton urban Area. Littlehampton – West Bank (SD4):

Insert the following into para 12.1.16 "...the provision of flood defences, improved access and land remediation. Further detail on delivery of the site can be found in the LEGA Development Delivery Study 2016. However it will...."

Consider the inclusion of an additional sentence be inserted at the end of para 12.1.16 to state: "Phasing will need to reflect provision of the necessary flood defence infrastructure, land raising and other associated work to ensure flood risk is not increased."

Either add following as new point 'e'. and then renumber following points "Provide a suitable buffer zone between the development and the river to allow for access for maintenance of flood defences and recreational use near to the river and ensure the integrity of the river banks is maintained". Alternatively, this text is put in to the intended LEGA SPD.

The following point on presentation in the sequential exception test is being discussed with the EA.

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
20	Judith Onuh	1028062	Knowledge the positive steps that the Council are taking in the preparation of the emerging Local Plan. We do however consider that continued work is required on the duty to cooperate relating to the capacity of the district to assist with accommodating a higher proportion of the unmet housing need within the HMA. It must be clear how the remainder of the unmet housing need within the HMA is to be delivered in the current plan period in accordance with the duty to cooperate before this plan can be considered to be positively prepared.	ALPMods 545
20	Wellbeck Land Ltd	1100351	Arun District Council has an obligation to identify additional deliverable housing sites in order to meet in full, their objectively assessed housing need (OAN); which includes affordable housing need and the Duty to Co-operate.	ALPMods 519
20	Mrs Jane Collins	1098918	Comment ; The cost of housing is high and even social housing is too expensive for the local youngsters wishing to get on the housing ladder. Will priority be give to local people? In order to have a cohesive community that must include small 1 bed houses for the younger first time buyer as well as 1 bed specialist retirement apartments.	ALPMods 83
20	Mr Geoffrey M Gibbs	616018	Concerns with the housing numbers within the Local Plan.	ALPMods 826
20	Mrs Henrietta Kendall	1100158	Does not support because under the duty to cooperate with neighbouring authorities who may not be able or might not want to provide for the needs of their own districts our area seems to be left with a large bulk of the housing. Most of these people will have to commute out of the area placing unacceptable pressure on road networks especially as improvements to A27 aren't going ahead.	ALPMods 466
20	Ferring Parish Council (Mrs Nadine Phibbs)	1099050	Ferring Parish Council must highlight that there is an inconsistency between the Housing & Economic Land Availability Assessments (HELAA) and the modified Arun Local Plan in relation to the land at Green Park which is situated in the Northern Gap, Worthing to Ferring. The HELAA states that the land at Green Park is deliverable. However, in the modified Local Plan under section 7 Settlement Structure & Green Infrastructure, 7.4.7, policy SD SP3, it is stated that gaps between settlements will be protected to prevent coalescence and to retain their separate identity. It will be detrimental to Ferring if this discrepancy goes forward to the examiner. Clarification is required	ALPMods 92

20	Angmering Parish Council	67083 9	Given the significant increase in OAN numbers, it is wrong to take what has in effect turned out to be a complete re-write of the Plan, through the Consultation process for modification. Even the Policies that stay the same between versions have a different effect when the delivery of housing over the Plan period is increased from 580 to 1,000+dpa.	ALPMods 678
20	Laurel Aldridge	10998 05	I am writing to oppose the Arun local plan in the strongest possible terms. The housing allocation as detailed in MM20/ Policy H SP1 is excessive and absurdly distributed.	ALPMods 270
20	Ms Sarah Caffyn	67529 7	I do not agree with the revised OAN figure and I do not agree with the proposal that the shortfall should be split between the parishes. I do not agree with the % of housing allocated to Walberton parish. The figures seem to be aimed at meeting a national target rather than addressing local need. As is already the case with recent/in progress housing developments in Arun, the new housing will draw in tens of thousands of people from outside the district/county thus exacerbating existing pressures on roads, schools, medical facilities, sewerage, etc.	ALPMods 429
20	Mrs linda Skinner	10982 96	I do not support this modification because I believe that contrary to current Government policy or National Planning Policy Framework it is not prioritizing brown field sites over greenfield sites.	ALPMods 157
20	Mr William Warren-Davis	11001 18	I don't agree with the OAN figure which has been revised upwards, because it's too high, and I don't agree with the proposal to split the shortfall between the parishes in a way that would give Walberton approaching 400 more houses.	ALPMods 445
20	Mrs Claire Lewis	11000 76	I object to the modification MM20 /Policy H SP1 in Arun's Local Plan. This policy goes against the NPPF's core planning principles (paragraph 17) that planning land use should 'encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value and take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it'.	ALPMods 437

20	Chichester District Council (Mike Allgrove)	78200 5	In general terms, Chichester DC supports the development strategy set out in the proposed Modifications to the Local Plan and welcomes the positive approach that Arun DC is taking to addressing housing and employment needs within the Chichester & Bognor Regis market area. However, Chichester DC is concerned that the potential cumulative impacts of the proposed housing developments on the A27 Chichester Bypass junctions may not have been fully identified in the transport evidence underpinning the Plan Modifications and that the Plan policies as currently worded do not provide assurance that the planned development will provide adequate mitigation for the likely traffic impacts. This Council considers that further detailed transport work may be necessary to identify the full traffic impact of the proposed development on the A27 at Chichester and to ensure that the relevant developments contribute towards mitigation measures in line with and equitable to the contributions being sought in the Chichester Local Plan area.	ALPMods 833
20	Mr Gordon Bell	87332 6	Inconsistent Housing Occupancy Data between Housing and Green Space Policy	ALPMods 316
20	Mr Colin Hamilton	10930 41	Infrastructure is not adequate to accommodate development. The calculated housing number is not correct. The allocation of the strategic sites is contrary to the democratic process and ADC are not working with Aldwick/Bersted and Pagham along these lines. The brownfield site at Ford is not in the Local Plan despite the council's obligation to prioritise brownfield sites.	ALPMods 38
20	Mr David Huntley	10993 33	MM 20 and MM 23 Policy HSP 2a The total housing allocation for west Arun has shot up from 880 houses to 10650. There are far too many houses allocated west of Arun, arly hard hit. There are also Aerodromes in Shoreham and elsewhere that could be used: brownfield sites should be used first (NPPF).	ALPMods 604
20	Mr Robert Bean	10997 63	New housing is not affordable for someone who earns average wage.	ALPMods 197
20	Mr Colin Hamilton	10930 41	Opposes allocation - It would be very much fairer to look for a larger number of smaller sites all around the area, on brownfield sites. The absence from the plan of the brownfield site at Ford which was proposed as an Eco town suitable for 5000 homes in 2008 needs explanation by ADC, particularly as they under legal obligation to consider brown before green.	ALPMods 28

20	Mr Stephen Aldridge	11001 49	Opposes distribution of allocations - I am writing to oppose the Arun local plan in the strongest possible terms. The housing allocation as detailed in Policy H SP1 is excessive and absurdly distributed. Fontwell, Yapton, Ford and Climping are all rural villages on the border of the South Downs National Park, with minimal infrastructure, high flooding risk, and abundant wildlife, yet between them they have been allocated 2600 homes, as opposed to Littlehampton (with good transport links and a railway station) with 1000 homes.	ALPMods 460
20	Mr John Gibson	10997 75	Opposes Greater Bognor allocation.	ALPMods 236
20	Mr Terry Hyland	11000 35	Overwhelmingly opposed to large developments around the Parish as they will ruin the distinctive rural character of the villages. Tupper's Field should be designated as a Local Green Space to ensure it is protected from future development.	ALPMods 413
20	Dr John Pilling	10999 97	Policy H SP1 proposes additional housing across the district without justification as to the need for that housing in this area. It cannot be effective without necessary infrastructure and appropriate employment, in particular with the Inland Arun villages which are poorly supplied with public transport links. It will not meet local needs it lacks sustainability and is incompatible with the Walberton Neighbourhood Plan	ALPMods 400
20	Dr Bruce Fogle	11001 45	Section 4.18 says, "The District's smaller settlements and rural areas will retain their character with limited new development to meet their needs." Section 12-1.11 states that 1500 new homes will be built in Ford which is a rural hamlet of approximately 500 households. This is a significant contradiction.	ALPMods 457
20	Barratt David Wilson (Giuseppe Zanre)	11006 29	Seeks to promote a site that is not allocated in the MM ; Land at Croftway Nursery, and Land West of Croftway Nursery, both of which are situated on Yapton Road, Barnham	ALPMods 549
20	Mr John Henderson	11002 11	Specifically the proposed building of 1,500 homes at Ford, seen in conjunction with the proposed building of an offline bypass of Arundel, threatens to make road use in the area at best congested and at worst dangerous through the addition of 3,00+ cars which would be leaving the Ford development to access local roads to the north via Ford road to the new bypass.	ALPMods 487

20	Persimmon Homes (Craig Hatton)	87471 5	Support - "The whole of section 12.1 for housing allocations as part of the Housing Delivery chapter has been rewritten to provide a housing strategy to reflect the updated evidence based around a new OAN of 919 dpa. This is a key section of the emerging Local Plan and the Council deserves credit for the additional work that has gone into the draft Local Plan since the OAN hearings of January 2016 however we are of the opinion that further work is required. We therefore believe that the DTC does not go far enough and that the OAN as stated in 12.1.4 should be higher than 919 dwellings per annum as currently given.	ALPMods 484
20	Sarah Waights	10990 53	The current policy document is incompatible with the Walberton, Binsted, Fontwell Neighbourhood Plan Neighbourhood Plan and is therefore unacceptable to me. I would urge ADC to show that Neighbourhood Plans prepared in accordance with requirements should be honoured and respected.	ALPMods 72
20	Aldingbourne Parish Council	11002 87	the housing figures appear unsustainable. The original OAN allowed for environmental constraints to reduce the housing target but this does not appear to have been done. Given the serious flood risk and drainage issues, the proximity of the South Downs National Park and coast, the high quality agricultural land and productivity of the District and local environmental constraints of landscape and biodiversity the ability of the District to accept 919 houses a year without harm to the environment and contradicting the NPPF must be open to question. How will the council establish the actual number to be built given the range of environmental and infrastructure constraints and given that the NPPF guidance is based on providing sustainable development? It is unclear that building 1,000 houses a year is achievable, a point which was demonstrated in relation to a lower figure at the EiP for the earlier LP.	ALPMods 506
20	Mr David Clack	10999 63	The method suggested at MM20 for providing the 1,250 new houses in the 22 Arun parishes cannot be made to work. We have spent considerable effort in preparing a sensible local plan that is now being over-ridden by unachievable targets.	ALPMods 386
20	Mrs Sue Wallsgrave	86936 7	The modification with regard to Housing, our villages are being joined together to make one large garden city, destroying what is left of our communities, this local plan should have been sorted out years ago, but because of the slap dash way in which ADC behave this has not happened, leading to stress for the local residents, and in some cases residents being driven out of the communities that they have lived in their whole lives, this is a form of cleansing, which ADC should be held accountable.	ALPMods 353

20	Bersted PC (Mrs Debbie Holcomber)	10981 52	There are questions regarding the underlying figures in the OAN. The Arun district is known to have relatively poorly paid employment which puts the purchase of housing beyond the reach of many young people. However, the house prices can also be seen as relatively inexpensive to people from better paid areas and this is contributing further towards out-commuting. The UK's decision to leave the EU may also reduce the overall number of new homes required.	ALPMods 130
20	Jackson Planning for Gleeson & Langmead PS	11008 74	There is little confidence that the plan as currently devised will provide a 5-year supply of housing land plus the appropriate 20% buffer over the plan period.	ALPMods 589
20	Walberton parish Council (Mr Andy Peppler)	10991 16	This Comment from Walberton PC and its Neighbourhood Plan Steering Group jointly (Walberton• ) questions MM20 in the March 2017 Arun Local Plan 2011-2031 (2017 ALP• ) Housing Supply paragraphs at 12.1.5 - 12.1.8, and related paragraphs in Arun's Housing Implementation Strategy of March 2017 (HIS). Its central focus concerns the 1,250 houses due to emerge from updating Neighbourhood Plans (NPs• ), or otherwise from a district-wide Development Plan Document (DPD• ).	ALPMods 94
20	Mrs Gillian Yeates	67643 8	This is a period of unprecedented challenges and change. The OAN figure was arrived at before the unexpected outcome of the EU referendum. Now we have an imminent general election and, should the same party be returned to power, their own election manifesto pledges to dramatically reduce net migration/immigration.	ALPMods 376
20	Mr Mathieu Evans	11002 39	This is a positive response to increasing the housing requirement of the Borough, in order to make the plan sound the figure of 20,000 units should be acknowledged as a minimum. Concerns about how the remaining 2,000 units will be delivered, given that the Council is proposing not to commence production of a Site Allocations document until 3 years post the adoption of the plan. This puts great reliance on meeting development needs in Neighbourhood Plans, many of which have already been put in place.	ALPMods 500
20	Mr Ian Truin	67011 7	This section is headed 'Housing Allocations' and starts with 'the LP Strategic objective for housing delivery'. But it includes concepts that ADC have not benchmarked or audited and factors that it can have no influence over. Issues of affordability are supposedly addressed through the OAN, not future policy	ALPMods 706

20	Angmering Parish Council	67083 9	Too much emphasis on providing for the OAN with apparently no challenge, including accepting 81 homes per annum under the Duty to Cooperate resulting in an unattainable target of 1,000 homes per annum for 20 years.	ALPMods 677
20	Mr Tim Lamming	11000 55	Walberton Parish Council is arguing that MM20 has not been justified and that Policy H SP1 has not been justified, cannot be effective, will not meet local needs and is contrary to government planning policy. The Parish Council also thinks the policy is impractical, unsustainable and incompatible with Neighbourhood Plan policies and objectives.	ALPMods 427
20	E White	73246 6	Wates recognises that the housing figures have increased significantly through the modification process and are now more aligned with the Inspector's comments made through the earlier examination stages. The total requirement figures are not being contested but instead the delivery mechanism and whether the plan has been positively prepared, is justified and thus can be considered sound.	ALPMods 599
20	Barton Willmore	92411 0	We support ADC's identification of a revised OAN figure.	ALPMods 571
20	Littlehampton Town Council (Mr Peter Herbert)	86943 1	West Bank has a strategic allocation of 1.000 dwellings and there is likely to be a further obligation to increase the parish allocation of 200 identified within Littlehampton's Neighbourhood Plan when the Plan is reviewed. The Town Council has resolved to review its Neighbourhood Plan once a Local Plan is in place and once the mechanism for doing so has been clarified by Government. Additional observations about infrastructure.	ALPMods 102
21	Mr Edmund Camerer Cuss	67399 1	Areas where Neighbourhood Plans are reviewed to to meet the Basic Conditions after the Local Plan is "made" should be excluded from any subsequent relevant DPD. That DPD should encompass only un-reviewed areas.	ALPMods 281
21	Mrs Lorraine Elder	10997 92	Concerned about the amount of housing.	ALPMods 257
21	Mr Ian Truin	67011 7	Considers housing supply figures contentious. Consider that an adequate range of strategic sites has not been defined to deliver the housing target (albeit that is too high in reality net of constraints).	ALPMods 707
21	Mrs Anna Aston-Clarke	10968 94	Disagrees with the housing number and thinks that it needs to be reviewed as infrastructure cannot cope.	ALPMods 106

21	Gleeson Developments (Nexus Planning - Adam Ross)	11014 97	For reasons expanded upon in detail in our representations to Policy H SP2c, we object to Table 12.3 which proposes to allocate only 400 homes to Yapton (SD7). This should be increased to 500 homes to include land at Burndell Road, Yapton.	ALPMods 726
21	Gleeson Developments (Nexus Planning - Adam Ross)	11014 97	For the reasons set out in detail in our representations to Policy H SP2c, we consider that the strategic allocation at Yapton (SD7) should be increased from at least 400 to at least 500 homes. This would result in the 'Strategic Site Allocations' row of Table 12.1 being increased by approximately 100 homes from 10,650 to 10,750 homes.	ALPMods 725
21	Mr Mathieu Evans	11002 39	Gladman note the proposed use of a stepped or variable trajectory to meet the housing needs of Arun, as outlined in Policy H SP1. We also note the findings in PELVP22 "Housing Implementation Strategy (March 2017) which provides the background for both the trajectory and the 5 year land supply for the plan. It is clear from the document that using a flat trajectory the Council accept that using either the Sedgfield or Liverpool methodology no 5 year land supply can be demonstrated.	ALPMods 501
21	Mrs Mary Cook	10991 04	Housing allocation too high	ALPMods 85
21	Helen Bates	10999 33	i AGREE WITH Walberton Parish Council'S ARGUMENT that MM20 has not been justified and that Policy H SP1 has not been justified, cannot be effective, will not meet local needs and is contrary to government planning policy. It also thinks the policy is impractical and unsustainable, and incompatible with Neighbourhood Plan policies and objectives.	ALPMods 367
21	Doctor David Smart	11001 17	I am objecting to your proposed building plans because they have an adverse effect on the permeability of the land, place an additional burden on our drains which have already proved to be unfit for purpose, and I believe increase the risk of me floating in sewage again.	ALPMods 444
21	Mr Mike Lambourne	10993 50	I do not support the requirement of 20,000 homes over the range of years stated, as on the 25/05/2017,	ALPMods 145
21	Ms Kirsty Sandbrook	10977 89	I do not support this modification as I think it is not sustainable to build so many more houses in this area. It will be damaging to the environment; cause the loss of agricultural land; have a negative impact on biodiversity; increase pollution; increase the risk of flooding and place strain on NHS services and schools. Decrease the high target to make it more realistic. Consider other options such as increasing funding for projects to bring empty homes back into use.	ALPMods 334

21	Mrs linda Skinner	10982 96	I do not support this modification because it would appear that the large scale housing developments are being situated predominantly in the west of the area on greenfield high quality farmland (which is currently being cultivated). This is an area where the infrastructure is very poor and there is limited road access .	ALPMods 137
21	Rydon Homes and Gleeson Developments Ltd	11012 52	In general terms, we welcome Policy H SP1 which proposes to provide for a total of 20,000 homes across the District in the Plan period (an average of 1,000 dwellings per annum). This has regard to the most recently identified objectively assessed need for housing in the District (919dpa as identified in the Council's Updated Housing Needs evidence produced by GL Hearn - September 2016) and an element of the unmet needs from elsewhere in the Housing Market Area.	ALPMods 672
21	Mr Ian Truin	67011 7	It is clear that the housing targets used as the basis for the Plan do not include an allocation for new dwellings in the SDNP, nor are there any figures for the Council house and Council developed-for-profit 'affordable' dwellings that Arun has committed to. There should be a section where the Council's strategy and operational processes for these two initiatives is plainly visible. The Council seeks to approve its own applications to build housing. Some transparency and a clear outlook on this should surely be part of a land use Plan?	ALPMods 682
21	Mr Ed Hanson	86460 3	Landform supports the identification of increased Objectively Assessed Needs (OAN). The OAN is now stated as 919 dwellings per year and Landform agrees with the amended wording proposed in MM21.	ALPMods 559
21	Mr Gary Smith	61692 1	Large scale housing development will not work on so many reasons. Suggests Much smaller housing developments, if this can't be achieved then build a new town in the South Downs	ALPMods 340
21	Climping Field Protection Group (Mr David Miranda)	10997 47	MM21. Paragraph 12 1 1 is at odds with the definition of Clymping as a small village with very limited services and facilities (3.9). It is inconsistent with the Vision in 4.18 for a small village with regards retention of character with limited new development to local needs. Strategic allocation SD10 virtually doubles the size of the existing village.	ALPMods 168
21	Mr and Mrs Alan and Margaret Brackley	11022 17	Objects to Clymping allocation - Clymping has suddenly become a "large sustainable inland village". Reference to the adopted Clymping Neighbourhood Plan shows that Clymping is in fact a small coastal village in a distinctive rural setting.	ALPMods 888
21	Mr Colin Hamilton	10930 41	Opposes allocation - The provision of 20,000 dwellings is 1/50 or 2% of the government target of 1 million. There are, I believe, 44 counties in England so there must be many many more DISTRICTS. Why is Arun assuming such a hugely disproportionate number?	ALPMods 29

21	Mr John Boldero	10997 96	Opposes development in Walberton	ALPMods 263
21	Clymping Parish Council (Mrs Val Knight)	10945 54	Paragraph 12.1.1 is at odds with the definition of Clymping as a small village with very limited services and facilities described in Paragraph 3.9. It is inconsistent with the Vision in Paragraph 4.18 for a small village with regards to retention of character with limited new development to meet local needs. Strategic allocation SD10 virtually doubles the size of the existing village and we object to this because it is contrary to our Neighbourhood Plan, it would completely change the character and rural setting of the village, and would result in a loss of Grade 1 and Grade 2 farmland.	ALPMods 524
21	Mr Henry Stamp	87464 6	Some sites in the HEELA are not available so the plan is not sound.	ALPMods 546
21	Barton Willmore	92411 0	Support - We support ADC's identification of an increased housing requirement and housing allocation phasing strategy across the Plan period.	ALPMods 572
21	E White	73246 6	Support for a site - These representations consider that Land east of Tye Lane, Walberton has been assessed as 'deliverable' within the HELAA with potential for 205 dwellings and should be considered for development in the short term in order to ensure the deliverability of a supply of market and affordable housing, on-site community benefits and infrastructure contributions. Walberton is a sustainable settlement with a range of local services and facilities and would score highly in sustainability terms. The site is available, suitable and achievable within the next 5 years.	ALPMods 602
21	Mrs Lisa Wickens	10992 81	Sustainable Agriculture Farmland should never be used for housing, the crops & produce that these fields produce are vital to our area and should these fields be taken over with housing our food will have to be obtained from further afield and this would increase in the cost of everyday living which is difficult enough for many in our community already.	ALPMods 134
21	Mr David Myers	69996 2	The new housing developments are needed to support the planned growth in employment identified through EBR. It is estimated that 23% of the working population out commute from Bognor Regis, impacting negatively on the transport infrastructure. The harmonisation of new housing and employment opportunities is a key requirement of the Local Plan, reducing out commuting and improving skill and wage levels.	ALPMods 550
21	Mrs Linda Skinner	10982 96	The number of homes being placed in the west of Arun on greenfield sites is unrealistic. This area is still completing the building of 1500 homes at Bersted and Felpham which have already placed strain on the infrastructure of this area.	ALPMods 158

21	Mr Laurence Ward	66730 8	The OAN figure of over 1,000 hpa should be reduced to a more sensible and achievable figure by applying constraints due to such problems as flood risk, lack of obs, lack of road infrastructure, lack of waste water treatment facilities. In particular, we believe that the scheme to build 2,300 houses at BEW is undeliverable because there is now no plan apparently for the new road over the railway to be built before the house building begins.	ALPMods 614
21	CPRE (Mrs Kia Trainor)	10998 23	We are concerned that the housing trajectory is not realistic. House-builders will not deliver more houses than can be sold at an acceptable-to-them profit and they will adjust build rates either up or down in response to market demand as they did during the financial crisis and the 'credit crunch' when build rates were much reduced.	ALPMods 856
21	Mr Derrick Chester	61385 7	Whilst the allocation at Ford has crept back up to 1500 I am not convinced that it is achieving its potential, in particular in relation to nearby strategic allocations at West Bank and Clymping. Really, they should all be looked at together. I cannot see how the Council has passed the previous Inspectors warning to avoid pre-determination by having failed to look at a substantially bigger settlement at Ford as part of this process.	ALPMods 65
21	Piers Bucknell	11009 17	Wishes site to be included as an allocation due to relationship to other strategic allocations. See attached concept block plan, constraints and covering letter attached	ALPMods 608
21	B and P Varney	10998 03	With reference to the Local Plan we wish to tell you we thoroughly agree and endorse all that Walberton Parish Council and the neighbourhood plan have commented upon regarding this latest plan. The housing Policy will not meet local needs and is contrary to government planning policy. The policy is impractical and unsustainable and incompatible with the Neighbourhood Plan policies and objectives.	ALPMods 268
22	West Sussex County Council (Darryl Hemmings)	61334 7	WSSCC note the amended housing allocations. The Infrastructure to deliver the sites should be identified in policies or the IDP.	ALPMods 817
22	Sport England (Laura Hutson)	61707 3	Sport England note that the Local Plan has allocated land for playing pitches where appropriate within the housing allocations. However, they strongly encourage the council to qualify this further, either by allocating a specific amount of land required, or by specifying what size these pitches are expected to be.	ALPMods 902

22	Aldingbourne Parish Council	11002 87	Arun's local Plan strategic objective for Housing Delivery is to: Plan and deliver a range of housing mix and types in locations with good access to employment, services and facilities to meet the District's housing requirements and the needs of Arun's residents and communities. Does this mean that Arun will restrict the sale of new housing for sale to residents of Arun? If so, that would be a welcome priority. At present without careful planning Arun's residents will be the people losing out	ALPMods 507
22	Wellbeck Land Ltd	11003 51	Considers the OAN cannot be met and suggests an alternative site for consideration.	ALPMods 523
22	Environment Agency (Mrs Hannah Hyland)	37533 7	EA state that Overall they support this policy and are pleased to see that for each of the allocation sites there are key requirements	ALPMods 111
22	Mr Paul Smith	10999 60	I strongly oppose the modification and the implementation of the overall plan.	ALPMods 381
22	Gleeson Developments (Nexus Planning - Adam Ross)	11014 97	In general terms, we welcome Policy H SP1 which proposes to provide for a total of 20,000 homes across the District in the Plan period (an average of 1,000 dwellings per annum). This has regard to the most recently identified objectively assessed need for housing in the District (919dpa as identified in the Council's Updated Housing Needs evidence. We do not take issue, as a matter of principle, with the use of a stepped trajectory where it is demonstrably the case that higher levels of housing delivery cannot be secured in the early years of the Plan period	ALPMods 727
22	Mr C Self	61473 3	Make more rural land available for sustainable housing development. This type of land has normally outlived it's rural need and would be better put to use for essential housing needs, be it for affordable, family or retirement purposes. To urgently change the growing and disturbing trend in allowing Landlords to rent rooms free in exchange for favours. Worthing has specifically been mentioned several times on the National news.	ALPMods 6
22	Mr John Gibson	10997 75	Opposes Greater Bognor allocation and need for secondary school in the centre of the District.	ALPMods 238
22	Mr Keith Meadmore	10992 22	Opposes Greater Bognor allocation Pagham for transport reasons.	ALPMods 165
22	Lucy Howard	95080 8	SDNP seeks close working in the future on applications on new site allocations proposed on the coastal plan, which have close visual relationships with the landscape of the South Downs National Park.	ALPMods 543

22	Barton Willmore	924110	support the consideration that development proposals within the Strategic Site Allocations should be comprehensively planned in so far as development proposals should address the cumulative impact with surrounding developments being brought forward for development, within their respective Site Allocation area, including technical matters such as highways.	ALPMods 573
22	Mr Ian Truin	670117	The Council cannot require "well-designed development employing a modern approach to principles of the Garden City movement" because without consultation with local people GC Principles fall at the first true hurdle. Detailed comments about the policy and request for master-planning.	ALPMods 709
22	mr giles binyon	1099244	The excessive building of houses on green field sites, adjacent to Pagham and Bersted villages (both with very minimal employment opportunities) makes it impossible to meet any of Arun's Strategic Objectives. An enormous investment in infrastructure ie roads, flood measures, sewage disposal, clinical staff with buildings to work in and teachers with schools would lessen the impact on some, but not all, of these Strategic Objectives.	ALPMods 390
22	Aldingbourne Parish Council	1100287	The policies to ensure green space and community facilities are delivered are improved and while we remain opposed to the BEW Strategic allocation as being too large for the villages we welcome the commitments in Policy H SP2, particularly those relating to the enhancement of the natural environment, landscapes and biodiversity, to extend, enhance and reinforce strategic green infrastructure and publicly accessible open space, connectivity of transport modes.	ALPMods 513
22	Mr Jack Cann	1099937	The scales of these developments are frightening and are completely disproportionate in terms of numbers of houses per site and the percentage of affordable, young family housing which is most required	ALPMods 379
22	Angmering Parish Council (Mr Rob Martin)	670839	The Strategic site East of Roundstone Lane is already being delivered as part of the EiP version of the Local Plan. The approach taken as part of the revision of the Plan is to exclude it from the scope of testing of key documents. This has resulted in gaps and inconsistencies in the data and recommendations being put forward for additional Strategic development at Angmering North.	ALPMods 694
22	Rydon Homes and Gleeson Developments Ltd	1101252	We support the general thrust of Policy H SP2 which seeks to identify a range of principles that would ensure the delivery of high quality development from the Strategic Site Allocations made in the Local Plan. However, we object to the wording of some of the policy criteria which lack precision and, accordingly, are open to misinterpretation at the development management stage and as such are unsound i.e. not effective.Re-word Policy H SP2	ALPMods 673

23	VARIOUS	See separate sheet	Opposes Greater Bognor allocation ALPMods104, ALPMods218,ALPMods221,ALPMods228,ALPMods229,ALPMods230,ALPMods232, ALPMods233,ALPMods234,ALPMods245,ALPMods25,ALPMods294,ALPMods341,ALP Mods344,ALPMods346,ALPMods408,ALPMods410,ALPMods431,ALPMods446,ALPMo ds448,ALPMods458,ALPMods46,ALPMods462,ALPMods467,ALPMods502,ALPMods63 1,ALPMods698,ALPMods737,ALPMods739,ALPMods740,ALPMods741.ALPMods747.A LPMods748.ALPMods751.ALPMods752.ALPMods753.ALPMods754.ALPMods77,,ALPM ods780,ALPMods781,ALPMods782,ALPMods784,ALPMods785,ALPMods786,ALPMods 787,,ALPMods789,ALPMods790,ALPMods792,ALPMods793,ALPMods795,ALPMods79 6,ALPMods799,ALPMods801,ALPMods802,ALPMods803,ALPMods804,ALPMods82,AL PMods836,ALPMods837,ALPMods838,ALPMods839,ALPMods841,ALPMods206,ALPM ods207, ALPMods152, ALPMods454, ALPMods849	Various
25	Environment Agency (Mrs Hannah Hyland)	375337	This raises technical points relating to drainage in the Aldingbourne and Lidsey catchments having an impact on water quality, as well as flooding issues and wastewater infrastructure needs. Goes on to recommend amendments covering potential additions to the policy and supporting text.	ALPMods 107
23	mr richard rabbett	1099854	Bersted and Pagham do we need additional housing, in such enormous amount, far less the extra traffic and load on our services and overburdened facilities.	ALPMods 362
23	Bersted PC (Mrs Debbie Holcomber)	1098152	Comment about the housing allocation and concerns about infrastructure. Housing numbers need to reflect true 'need' and be sustainable. There should be a reallocation across the region to ensure that infrastructure provision keeps pace with the escalating housing numbers.	ALPMods 131
23	John and Elizabeth Vince	1099062	Concerned about the allocation and asking ADC to consider, traffic impacts, secondary school and flooding issues.	ALPMods 78
23	Mary Gostling	1099824	Concerned about the Greater Bognor allocation for transport., flooding and infrastructure reasons.	ALPMods 285

23	Mrs Susan Glover	10989 25	Concerns about traffic congestion and flooding	ALPMods 419
23	Mr Ralph Ansley	10990 58	Does not support the plan as it would result in the loss of high grade agricultural land.	ALPMods 401
23	Mr Garry Sleet	10997 81	Eastergate Parish Council considers that the policy does not sufficiently promote its plans to account for climate change and likely sea level rise, by not positively presuming against development on flood plains.	ALPMods 348
23	Hanbury PM Ltd	11011 13	Hanbury (PM) Ltd support the allocation of Pagham South for development within the emerging Local Plan for development but comments that some further clarity is required for the policy.	ALPMods 647
23	Susan and Michael Monger	10998 77	Having studied the plans for the above site plans, i.e. 2500 homes Bersted/Aldwich, we wish to submit our views. We live opposite the proposed site in Chalcraft Lane, West Meads, and we would strongly disagree with the proposal	ALPMods 326
23	Yvonne Hickmore	10998 27	HSP2 With no sign of improvements to the A27, things can only get worse. Therefore this proposed plan does not meet the needs of the area.	ALPMods 289
23	Mrs Brenda Streatfield	10997 29	I do not support the Greater Bognor Regis Area Housing Allocation Policy.	ALPMods 206
23	Mr Ron Streatfield	10997 66	I do not support the Greater Bognor Regis Area Housing Allocation Proposals Plan MM23	ALPMods 207
23	Mr Michael Foard	11002 06	I do not support the modification 3700 houses being built at Pagham/Bersted has nothing to do with supporting Bognor Regis as a holiday centre or University Campus location and is therefore not justified or sustainable, these houses at a standard occupancy rate 2.4 x 3700 equates to close to 9,000 people travelling the already congested village roads to get to work schools etc.	ALPMods 486
23	Mrs Gillian Yeates	67643 8	I do not support the modification: The new allocation for Bersted of 2500 homes needs to be considered with the 1200 for Pagham (included in the same allocation) as well as the 3400 for Barnham/Eastergate/Westergate and Fontwell as these will come down almost to the northern boundary of Bersted Parish.	ALPMods 385
23	Miss Nicola Clarke	11001 34	I do not support this modification because it would be damaging to the local infrastructure (limited roads and flood areas) wildlife and environment (building on green land not brown land), local economy (agricultural production).	ALPMods 453

23	Mr. Michael Warden	10997 12	I don't believe there is any justification for building the amount of dwellings proposed by this document as it is not tackling the NEEDS of the LOCAL PEOPLE it is only satisfying aspirations of others. (No change)	ALPMods 342
23	Alan Hickmore	10998 25	I object to the Arun District Local Plan for Bersted Council area which includes 2500 houses. The proposed site is Grade I agricultural land. I understood that this type of land was protected by Green Belt.	ALPMods 286
23	Ms Kirsty Sandbrook	10977 89	I strongly oppose the proposed new housing in Bognor Regis/West of Bersted/Pagham	ALPMods 335
23	Mr John Francis	10992 99	I understand that there is no significant housing needs of the Worthing area. There is little employment in this area to justify so many new homes. So there would likely be significant additional road traffic trying to make its way either north to Chichester or east towards Littlehampton and beyond. Additionally, I understood it was government policy to protect the Green Belt.	ALPMods 497
23	A C Martin	11010 71	I wish to object most strongly to proposals being made in respect of the above Plan, particularly Modification MM 23, policy ref H SP2a, which seeks to earmark land to the west of Chalcraft Lane, Bersted for an unbelievable 2,500 new dwellings and sites at Sefter Road, Barton Farm, Hook Lane, etc in Pagham for another 1,200 homes - all this on GREENFIELD SITES, i.e. PRECIOUS FARMLAND.	ALPMods 633
23	Mrs Janet Bennett	87310 8	I wish to object to the ADC local plan 2011 -2031 to include the land in Bersted behind Chalcraft lane as proposed for house - building in the future.	ALPMods 293
23	Sarah Freeman Smith	11012 01	I wish to raise my concerns about the inclusion in the Local Plan for Arun, the sites at Summer Lane, Hook Lane and Sefter Road, Pagham and Chalcraft Lane, (West) Bersted all of which are greenfield sites and I do not believe are justified.	ALPMods 664
23	Mrs Gwenda Garratt	11017 81	If gaps between settlements are important then they should not be removed without reviewing other suitable sites that are not so identified. For example Ford Eco town is now in the plan with 1500 houses however it is capable of absorbing much more and has many positive reasons for being the preferred site and has previously been identified as able to take 5000 houses.	ALPMods 794
23	Sylvia and Colin Linegar	10998 02	It is with great disbelief that Arun District Council are subjecting the Greater Bognor area for more housing developments. This will have a huge devastating effect on the local area which is already bursting with traffic problems. We therefore most strongly object to this development.	ALPMods 267

23	Bersted PC (Mrs Debbie Holcomber)	10981 52	Largescale housing development is predominantly on the western side of the district which is unbalanced, particularly in the light of the Duty to Cooperate. We believe that this does not accord with policy QESP1 in that there will be significant negative impact upon residential amenity. The road layout shows no improvement to the A259 along Rowan Way and the A29 through Shripney village, both of which are bottlenecks, particularly since the opening of the Bognor Regis Northern Relief Road which was supposed to alleviate traffic following the Policy Site 6 developments at Bersted and Felpham.	ALPMods 126
23	Mrs Pamela Tardival	61664 9	Little regard seems to have been considered with regard to tourism in this area. Several large park sites open for the summer months swelling the population and also adding to traffic delays on local roads and demands on a poor infrastructure.	ALPMods 697
23	Mrs linda Skinner	10982 96	Little regard seems to have been considered with regard to tourism in this area. Several large park sites open for the summer months swelling the population and also adding to traffic delays on local roads and demands on a poor infrastructure. Reconsider the housing sites.	ALPMods 485
23	Mrs Rachel Simon	10997 54	MM23/H SP2a is totally at odds with the NPPF, and would definitely NOT "enhance the natural environment, landscapes and biodiversity. At a time when we should be protecting our fertile farmland (ie due to Brexit and the need to produce more of our own food) we should NOT be building on prime greenfield sites. I believe this is also inconsistent with ADC's own policies ie that the Bognor/Chichester gap will be protected but very littele land remains under ADC control.	ALPMods 345
23	Ms Wendy Kapp	61601 7	Modification MM23 is not in accordance with ADC Policy T SP1 (P210 OF Local Plan) which states growth should strengthen Arunâ€™s Economic base, reduce congestion and contribute to highway improvements. The modification will do none of the above but merely increase out commuting. Road proposals are not adequate to reduce congestion. Also MM23 is not in accordance with ADC Policy QE SP1 (P281 of Local Plan) on quality of environment - it would have a devastating effect on the natural environment and will cause High Grade Agricultural Lane in one of the sunniest places in England to be lost forever.	ALPMods 622
23	Mrs Shirley Hamilton	11000 66	My concern is the maintaining and protection of the these unique character areas & of much needed farmland for the increasing future population. There is concern for strain on Sewerage networks that are stretched as it is.	ALPMods 434
23	Mrs Alison Giacomelli	10998 42	Natural England welcomes the inclusion of clauses relating to the presence of Pagham Harbour SPA/Ramsar in Policy H SP2a.	ALPMods 328

23	Mrs Janet Dunstone	10997 18	Not consistent with ADC policies: SD SP3 states that the Bognor/Chichester gap between settlements will be protected but very little land remains under ADC control.	ALPMods 150
23	Mr Ralph Ansley	10990 58	objection to the Arun district council Chalcraft Lane development plan as it is ;flood zone, agricultural land, infrastructure issues etc.	ALPMods 76
23	Mr Robert Bean	10997 63	Opposed to Greater Bognor allocation - suggests building elsewhere in West Sussex where infrastructure can cope.	ALPMods 191
23	Jane E Weston	11010 84	Opposed to large scale development Pagham in this plan when you have received about 2000 letters of objection to the proposed developments, with very valid reasons that need in depth examination. Infrastructure is inadequate.	ALPMods 641
23	Mrs linda Skinner	10982 96	Opposes allocation - I do not support this modification because too many houses are being proposed for the west of the area (Pagham and Bersted) on greenfield sites. Site 6 is still being build in this area and has placed a large strain on local infrastructure particularly the roads	ALPMods 159
23	Mrs Margaret Wildash	11020 49	Opposes allocation - My objection to more houses in Pagham, Rose Green and Bersted not only will we need the farm land for growing food and for farming meat. All more important than building more houses. We have an abundance of houses here which are only used a few weeks in the Summer, or buy to let.	ALPMods 843
23	Mr Andrew Robert Dove	61479 8	opposes allocation as - The areas where these Housing Developments area proposed have notorious levels of unemployment plus the earnings of those who are employed are some of the lowest in the country, with the result that almost all of the properties being proposed ae not in an affordable price range to our local people. The end result will be to create a massive increase in population levels into our area which will have a disastrous effect on our Hospital Services, Doctors Surgeries, Local Schools, Social Services, etc. etc.	ALPMods 842
23	David and Helen Norton	10990 56	Opposes allocation in Greater Bognor. We do not need housing and industrial development on this scale, yes we do need some local housing to support local demands, but this residential development will become a dormitory town for workers in Surrey, London and Southampton.	ALPMods 75
23	Mr Michael Hampton	10997 38	Opposes allocations - The Housing Proposals for both Pagham ( all of those) and Bersted are not well founded on facts and in relation to policies and practical requirements.	ALPMods 216

23	Ms Kirsty Sandbrook	10977 89	Opposes development in the Bognor area as the increase in housing in the Bognor Regis area will cause a substantial increase in cars on the roads and further increase congestion, specifically people commuting to Chichester for work. There are already long traffic jams on Chalcraft Lane, Rowan Way and the A259 in Bognor Regis which will worsen. This will create further congestion and air pollution which is damaging to health.	ALPMods 336
23	Nicky Linzey	11002 52	Opposes Great Bognor allocation and issues with the consultation.	ALPMods 502
23	Dawn Latimer	11000 02	Opposes Greater Bognor allocation	ALPMods 402
23	Mr David Lainchbury	10998 69	Opposes Greater Bognor allocation - A development of 2500 dwellings is unjustified and unsustainable	ALPMods 330
23	Mr Frederick Wood	11010 56	Opposes Greater Bognor allocation - I am concerned about the use of farm land. As we live on an Island. We need land to feed ourselves. Also who in Bognor area buy these expensive houses when they cannot afford the deposit.	ALPMods 625
23	Ian Watson	11010 74	Opposes Greater bognor Allocation - I am writing to protest in the strongest way to the proposed developments in Chalcraft Lane	ALPMods 637
23	Mr Brendan Behan	10997 26	Opposes Greater Bognor allocation - I do not support this, as the infrastructure is unable to support the current capacity, this would greatly increase the traffic chaos on the already busy and congested roads. The recent loss of the A27 Chichester Bypass will only worsen the traffic congestion.	ALPMods 205
23	Mr Richard Bennett	69929 3	Opposes Greater Bognor allocation - I wish to object to the inclusion of the area to the north of Chalcraft Lane, Bersted and to the East of the Lower Bognor Road, linking the Hewarts Lane Roundabout, Aldwick to the A259 in the Elbridge area.	ALPMods 659
23	Mr Darrell Latimer	11011 11	Opposes Greater Bognor allocation - It is irrelevant what these modifications are because this Local Plan for development here, is completely alien to what we need in this area.	ALPMods 646
23	Mr Roderick White	11018 22	Opposes Greater Bognor allocation - Not consistent with ADC policies: SP3 which states that the Bognor/Chichester gap between settlements will be protected but very little land remains under ADC control.	ALPMods 805
23	Mrs Pamela White	11017 97	Opposes Greater Bognor allocation - Not consistent with ADC policies: SP3 which states that the Bognor/Chichester gap between settlements will be protected but very little land remains under ADC control.	ALPMods 798

23	Mrs Gill Witt	10993 72	Opposes Greater Bognor allocation - Pagham/Bersted is being dumped on to meet increased housing allocations. Little consideration given to fair distribution.	ALPMods 182
23	Mr Harry Marchant	11017 47	Opposes Greater Bognor allocation - suggests Ford aerodrome instead as a brownfield site.	ALPMods 783
23	Mr Kevin O'Grady	11009 90	Opposes Greater Bognor allocation - The increase for Pagham/Bersted of 150 to 3700 houses is an unsustainably high number of houses in a concentrated area, in excess of local housing needs, where wages are low with limited ability to purchase a house	ALPMods 617
23	Dr Dorabella Northcott	11009 99	Opposes Greater Bognor allocation - The increase for Pagham/Bersted of 150 to 3700 houses is an unsustainably high number of houses in a concentrated area, in excess of local housing needs, where wages are low with limited ability to purchase a house.	ALPMods 618
23	Mrs Irene Munro	11015 73	Opposes Greater Bognor allocation - THIS PROPOSAL IS NOT CONSISTENT WITH ADC POLICIES; SD SP3 WHICH STATES THAT THE BOGNOR/CHICHESTER GAP BETWEEN SETTLEMENTS WILL BE PROTECTED BUT VERY LITTLE LAND REMAINS UNDER A.D.C. CONTROL	ALPMods 750
23	Mrs M J Sweeny-Smith	61688 1	Opposes Greater Bognor allocation - wants Ford brownfield site to be used instead.	ALPMods 797
23	Mr Malcolm King	11010 17	Opposes Greater Bognor allocation - We already have too many houses being built between Bognor and Chichester and the infrastructure cannot cope with extra population.	ALPMods 620
23	Roy & Jean Huse	11011 48	Opposes Greater Bognor allocation - We are writing to express our total opposition to plans for new development on agricultural land off Chalcraft Lane, West Bersted which will place an enormous and unwanted load on all our local services and at the same time destroy a large part of the environmental attractions of the District.	ALPMods 660
23	Mr Hartley Elder	10993 58	Opposes Greater Bognor allocation - Why are the district housing needs being concentrated predominantly into the west, particularly as the majority of new residents will have to commute out of the area for employment; with the associated environmental pollution?	ALPMods 227
23	Mrs Iris Curl	11021 40	Opposes Greater Bognor Allocation due to concerns about loss of agricultural land and infrastructure.	ALPMods 865
23	Mrs Beryl Bowley	11017 74	Opposes Greater Bognor allocation due to traffic congestion	ALPMods 791
23	Mrs Lorraine Elder	10997 92	Opposes Greater Bognor allocation due to traffic congestion.	ALPMods 258

23	Mrs Josie Jarvis	10997 80	Opposes Greater Bognor allocation for flooding reasons	ALPMods 252
23	Mrs Gloria Irene Cottrell	11020 53	Opposes the allocation as it is on agricultural land	ALPMods 848
23	Mrs Wendy Bonnick	11018 02	Opposes the Greater Bognor allocation - The National Policy - states not to build on greenfield sites.	ALPMods 800
23	Mrs Mary Cook	10991 04	Pagham Harbour is a protected area so why would Arun even consider such a large development, the light and noise pollution alone will have a huge impact on the wildlife here as the proposed development goes right up to the edge of the reserve. The much increased footfall will also be detrimental to the wildlife and nesting sites. The landscape will be ruined forever along with large swathes of top quality arable land .	ALPMods 87
23	Pagham Parish Council (Miss Nicola Jones)	93457 2	Pagham Parish Council strongly objects to the Strategic Allocation of sites for major development on the rural fringes of Pagham as specified in Section 12.1.11 "sites SD1 (Pagham South) and SD2 (Pagham North). The proposed development of some 1200 houses on the periphery of the village represents a massive departure from the allocations in the original Local Plan (some 110 houses in total) and is clearly in direct conflict with some key objectives and policies identified elsewhere in the plan.	ALPMods 120
23	W Dilkey	11000 92	Please do not build any more houses that are taking our farm land. Two Council houses for Bognor Regis is very very Poor. Council houses should be given to those who are born in West Sussex. Arun does not listen to people like site 6 you have made up your minds. Better Doctors, Schools that children can walk to, or buses that are cheaper.	ALPMods 438
23	Margaret Dean	11015 32	Road infrastructure Poor windy Road to Chichester and the Chalcraft Lane Racetrack.	ALPMods 733
23	Mr Michael Lovell	10977 60	So the proposal is not justified and not consistent with NPPF. It is not positively prepared because it does not show a masterplan of how to integrate infrastructure incorporating healthy modes of transport - e.g. cycling -into everyday life for the people in these developments	ALPMods 213
23	Mr Ed Hanson	86460 3	Supports the inclusion of the Greater Bognor area allocation	ALPMods 560

23	LRM Planning on Behalf of Hallam Land Management Ltd. (Mr Owen Jones)	10951 64	Supports the overall approach for the Pagham North sites. Further information over how the Hook Land proposal helps achieve the policy criteria is set out fully in their representation and why the Pagham sites are a sound allocation to enable the Plan to provide sufficient housing in line with the Strategic approach.	ALPMods 505
23	Mr Michael Fletcher	10951 59	Supports the principle of proposed allocation SD3 and request attendance at the hearing and as the promoters of the largest allocation in the LP believe that this is essential to explain the extensive technical work done to date on site to support the allocation.	ALPMods 668
23	Mr David Hall	11001 29	The amount of houses this side of Bognor as opposed to Littlehampton, Worthing in respect of how large our villages are compared with the bigger area of the previously areas is completely unfair and not thought through sufficiently for the resident here.	ALPMods 450
23	J D Weston	11010 79	The current Pagham Village infrastructure is already overloaded and that the suggestions in the Local Plan to improve this will be in no way adequate if a further 1000 plus houses are to be built.	ALPMods 638
23	Mr Darrell Latimer	11011 11	The field in Chalcraft Lane (West Bersted) is so important in helping the rain drain away. These houses would hinder this natural flow, as it would be mostly concrete, causing flooding. Also we are led to believe that we need fields like this for extra food production!	ALPMods 648
23	Mrs Gillian Yeates	67643 8	The housing development is predominantly in the western area of the Arun district. The proposed realignment of the A29 which funnels potentially huge amounts of additional traffic through the village of Shripney is completely unacceptable (and contravenes Arun DC's own policy QE SP1 which pledges to protect the quality of residential amenity and provide safe environments).	ALPMods 368
25	Jackson Planning for Gleeson & Langmead PS	11008 74	The joint site promoters SUPPORT this revised policy for the plan that identifies the new strategic allocations overarching policy however, two of the caveats are not justified in relation to both sites. Only site B has capacity to consider Self-Build and Custom Build, Site A is not available for this type of product. Neither of the site promoters land is available for Gypsy and Traveller accommodation	ALPMods 583
23	Philip Lewis	11000 42	The modification places an unsustainable burden on the areas around Pagham, Bersted and Aldwick	ALPMods 415

23	Mr R.W. Dewick	61527 7	The modification to include 2000-plus houses in "West Bersted" contravenes all the assurances Arun have given since 2008. It would erode the gap between Bognor and Chichester, reduce sustainability, and throw burdens on the roads, drainage, sewerage, medical, and educational networks than cannot be met without enormous expense. Allotments or a solar farm would be far more sustainable.	ALPMods 397
23	Mr Anthony Tack	11001 23	The number of dwellings proposed would mean more cars resulting in busier and possibly gridlocked roads. Gas, electricity and sewage would be affected. The water pressure in West Meads is already poor, so additional properties would make this worse. It is hard enough to get a doctors appointment and if there are more people it would make this worse unless they provide an additional surgery. The countryside is precious and building on such land would have a major impact on the environment and wildlife.	ALPMods 447
23	Mr Giles Binyon	10992 44	The numbers of houses being proposed for the Western boundary must be regarded as completely disingenuous. Using quality agricultural land to build mainly large amounts of housing in an area with already over stretched infrastructure and little local work smacks of something rotten at Arun D C, because people know there are alternative sites available. The many "flowery words" used by the authors of this document will (we know from past experiences eg. site 6 Bersted) bear little resemblance to what will occur for the locals in this area.	ALPMods 119
23	Mrs Josie Jarvis	10997 80	The numbers of houses that are proposed in and around Pagham are not in an area accessible to employment, they do not have the infrastructure, they are not meeting the demand which if there was a demand would be for bungalows as this is mainly a retirement area. The Local Plan does not seem to be able to differentiate between areas and houses are being thrust upon areas that are not suitable. Why not build at Ford where there is access to A259, A27 and there is a railway station?	ALPMods 248

23	Mr Philip Heath-Coleman	10999 12	The proposals in Policy H SP2A for 1200 additional dwellings in Pagham, with a further 2,500 at West of Bersted, would represent an increase in parish population of over 40% and is unsustainable. It will overwhelm the village of Pagham and its infrastructure, especially its roads. Whilst a limited increase in housing provision is undoubtedly needed, and has been provided for in the Pagham Neighbourhood Plan, an increase in population on the scale contemplated would overwhelm local facilities, bring even more serious congestion on local roads, and could so change the nature of the village as to make social integration difficult. Although it appears on a map to be a suburb of Bognor Regis, Pagham still retains its village character, greatly valued by its residents, which would be gone forever with development on the scale proposed. Detailed observations about concerns for this allocation.	ALPMods 358
23	Mr David Court	11000 58	The proposed developments will have a negative impact upon natural environment and landscapes.	ALPMods 428
23	Clive Richardson	11017 36	The road proposals are not adequate to reduce congestion.	ALPMods 779
23	Mr Michael Hampton	10997 38	The Strategic approach and SD SP1a do not adequately set out the national importance of the agricultural/horticultural areas that are no proposed as housing areas although remote and poorly served by low quality transport linkages.	ALPMods 359
23	Mr Mike Lambourne	10993 50	The West Bersted site appears not to have very good access, especially the Lower Bognor Road (B2166) as that road is currently used as an alternative to A259 to Chichester and further destinations west. Pagham looks set to suffer from no road improvement either. Access to the A27 will still be both the junction of the A259 and A27 and the Selsey road heading north (B2145) to the roundabout on the A27 Whyke road.	ALPMods 147
23	Mr Dave Monkton	10997 99	The whole point of any future "local plan "should be to make detailed outcomes and appraisals of the impact of all this additional housing on the environment and infrastructure and to put in place alternatives and solutions.	ALPMods 265
23	Mr Michael Hampton	10997 38	There are proposals for major growth of Pagham and Bersted. Neither is justified when the disadvantages are considered or in relation to assistance to other areas, who should not be assisted in any event where it is disadvantageous to this Authority and area.	ALPMods 355

23	Mrs Jane Collins	10989 18	There have been over 2000 letters of objections sent to ADC re planning applications for Sefter Road, Hook Lane and Land south of Summer Lane & West of Pagham Road, surely this has already send a clear message to ADC, that local residents concerns need to be listen to. Better alternatives have not been fully considered and that irreparable damage to the infrastructure, way of life, natural and built heritage and local employment will occur in Pagham and Bersted. I do not support this policy as it is not positively prepared.	ALPMods 80
23	Mrs Eunice Wood	11010 64	These houses are not affordable to local people so who are they for - people commuting. Therefor no benefit to us plus traffic will be intolerable. Have you considered the Pollution and damage to roads and surrounding buildings. The roads are bad now with an increase of cars we will be permanently grid locked. We will need another Hospital Surgery's and schools and Staff to man them. Where from? Should not use farm land.	ALPMods 626
23	Mrs Fiona Huntley	10993 31	This plan is unsustainable.	ALPMods 135
23	Mr Martin Wingrove	10997 48	This policy is totally unsustainable for the area.	ALPMods 181
23	Mr N Mundy	11011 19	We must also consider the reduction of wildlife habitats. One site in Pagham has historically been a wintering place for Brent Geese due to the wheat that was planted there. The wheat was not planted this year which meant that the Geese did not land - was this a coincidence as there is a planning application being considered on the site and surveyors are looking into the wildlife there?	ALPMods 656
23	Barton Willmore	92411 0	We support the identification of strategic development at SD1 Pagham South and SD2 Pagham North identifying the key design and infrastructure requirements. We acknowledge the reference to the need for contributions towards strategic infrastructure.	ALPMods 574
23	Cliff/Cheryll Brown	10936 62	We wish to call into question how West Bersted can take a new Garden City development in such a small area. Obviously the infrastructure can not support such a development	ALPMods 310
23	Mr Stephen Lias	92875 0	When I was a member of the Bersted Parish Council the land between Rowan Way and Shripney Lane was designated to be used for leisure use. All you have done with it is build a road through the middle of it. All Bersted appears to have is all the pain, but none of the gain!	ALPMods 847

23	Beryl Richards	10998 88	While it is clear that a Conservative council that stuck its feet in hard over the issue would not wish to be seen to be executing a volte face, it is clear to huge numbers of people here that there is something very wrong and troubling about this issue and the way it has been handled by ADC. The government's position is crystal clear. Brownfield before Greenfield.	ALPMods 343
23	Graham Wilkins	11000 43	Without major planning, and re-building of the infrastructure of the area as a whole, starting with the main A27, developments of this size, in this pocketed location is unsustainable and will negatively affect the living standards of all who live here and call it home.	ALPMods 416
24	Environment Agency (Mrs Hannah Hyland)	37533 7	Talks of working with the Council over the suspension period and up to resumed hearings, confirms that the evidence base is robust and the distinct delivery issues associated with the site and how they can be overcome. It goes on to recognise the reclassification of the Littlehampton West Bank site does not fall within an area classified as "functional floodplain". EA are therefore supportive of the site being reclassified from Flood Zone 3b to Flood Zone 3a. Raises some points of presentation as the document is currently drafted. EA are glad to see an SPD is to be produced for the location and will continue to work on this with the Council.	
24	James Baird	67803 7	Comments on the LEGA DDS masterplan including phasing, capacity, uses, contamination, viability, funding and the allocation boundary.	ALPMods 901
24	Mr Andrew Finnamore	10998 36	No change cannot be an option here. Similarly, the easiest route to provision of homes is to focus on the simplest solution, but it rarely provides the long term benefits and sustainability. On the surface other strategic sites in the district 'could provide the numbers', but none of the others offer the wider dividends. L.E.G.A. does so much more than other sites, which is why the Local Plan Policy should demonstrate enough flexibility, on sites such as this, to ensure viability is achieved.	ALPMods 298

24	Mrs Anna Budge	85089 6	NT supports the policy but requests that clarification with land ownership and boundaries using information supplied.	ALPMods 274
24	R and F Boyce	61480 8	Support - In general the modification supports the principal of an urban extension to the town thus making better use of the harbour and river as the catalyst for tourism and economic activity by increasing the number of deep water moorings. The provision of proper transport access and the vital inclusion of new flood defences to protect existing businesses and homes is and should remain a condition precedent to the development of the West Bank.	ALPMods 494
24	Mr Derrick Chester	61385 7	Supports the overall vision for the Littlehampton-West Bank allocation but feels it needs to be delivered as outlined and wishes the inspector to consider: memorandum of understanding between landowners; that the EA lifts its previous objection; viability - ensure that this will not be achieved through watering down affordable housing as there are a number of current occupants on low incomes; plus connectivity to the town centres and so local economy. Feels that there would be a lot of opportunity to deliver improved river transport. Separately considers that if the Climping and Ford allocations expanded were included with this that it would deliver a more comprehensive flood scheme. Also considers that the allocations around Littlehampton are for no more than places to build more flats and that Littlehampton already gets new builds through windfall sites, so these will encroach into retail and employment use areas so having the opposite effect.	ALPMods 66
24	Littlehampton Town Council (Mr Peter Herbert)	86943 1	The Town Council is yet to be wholly convinced that with the level of infrastructure required and no MOU in place between interested parties/landowners, whether the site is truly viable. Equally with regard to the Ford allocation of 1,500 whether this number is really enough to deliver the kind of infrastructure improvements necessary. There should also be joined up thinking between proposal sites, for example river transport between LEGA/West Bank and Ford.	ALPMods 100
24	Climping Field Protection Group (Mr David Miranda)	10997 47	Within Policy H SP 2b it is important to note the extent to which the proposed LEGA boundary lies in Clymping. CFPG is unaware of any improvements to the A259 proposed between Littlehampton and Clymping. 1000 new homes and new businesses will inevitably worsen peak traffic issues.	ALPMods 171
25	West Sussex County Council (Darryl Hemmings)	61334 7	WSCC comment and support for Inland Arun polices and some minor wording changes	ALPMods 818

25	Mr Nigel Hodson	10970 27	Climping - I do not support this modification, An additional 300 houses in Climping will roughly double the size of the village, and therefore alter the character and nature of the village.	ALPMods 186
25	Aldingbourne Parish Council	11002 87	Comments about the ability of the roads to cope and improvements required.	ALPMods 509
25	Gleeson Developments (Nexus Planning - Adam Ross)	11014 97	Consistent with the Council's own process, and its approach to strategic allocations at other settlements, land south of Burndell Road should form part of the strategic allocation at Yapton (SD7), and the allocation at the settlement should revert to 500 homes. The current approach is unsound as it	ALPMods 728
25	Mr Ian Truin	67011 7	Create a master-plan. Various comments about details in the policy and that 3000 homes has not been tested.	ALPMods 711
25	Mr Jason Ambridge	11000 50	Do not support this modification. It seems that little thought has been given to the fair distribution of houses. Paghams/Bersted is being 'dumped on' to meet the increased number of houses. This leaves local traffic bottlenecks unchanged.	ALPMods 421
25	Mr Paul Aston-Clarke	10979 50	Does not support the allocation of 300 homes at Climping as it results in the loss of soils for horticulture.	ALPMods 14
25	East Preston Parish Council (Mr Simon Cross)	75860 1	East Preston Parish Council object to Angmering Parish Council's proposal for housing to be built on Roundstone Farm land.	ALPMods 531

25	Mr Derrick Chester	61385 7	Feels that though disruptive while being built a new settlement is required to deliver infrastructure. Talks through advantages of development at Ford to deliver infrastructure. These include: wastewater treatment works could be expanded; Ford Prison could be revamped following discussions with Ministry of Justice; pedestrian and cycle links, as well as river transport; provision of secondary health and employment opportunities; new road links to A259 and A27; and believes that this would deliver sea defences at Littlehampton. Though glad that the amount for Ford has gone back up to 1500 considers that a much higher level at Ford should have been tested and as not having been the Council are still pre-determining things. Do not believe the Ford location is achieving its potential. Further concerned about deliverability of the Parish allocations, requiring neighbourhood plans to be revisited and not believing that there will be enthusiasm, due to numbers being forced on them through strategic allocations, meaning that these will fail at referenda as seen as opposition to ALP.	ALPMods 64
25	Jeanne Faber	69871 7	have read the comments on the Local Plan made by Clymping Parish Council which I endorse and support.	ALPMods 300
25	Mrs Sylvia Belcher	67113 6	Having deliberated for many weeks on Arun's Local Plan (2013-2031) my conclusion is the infilling of already built up areas is not the answer, due to infrastructure already at full capacity and the likelihood of flooding further downstream. New settlements offer many advantages over town/village extensions.	ALPMods 308
25	Mrs J Dunning	61478 5	I agree with Walberton Parish Council's representation against this item.	ALPMods 370
25	ms Paula blackbrow	10993 20	I am objecting to the proposal of additional 300 houses planned in the Climping area, the proposal is on the grounds that Climping will no longer be a village in the beautiful countryside of West Sussex but yet another congested Town merging into a blank canvas of housing developments.	ALPMods 136
25	Mrs Olivia Wright	10987 48	I am writing with respect to the changes being made to the Arun Development Plan, specifically with respect to the HELAA report in which you consider the field behind the property at Bonhams in Hoe Lane to be "deliverable" and able to sustain the building of 39 dwellings. I would like to take issue with this proposal	ALPMods 37
25	Mrs Valerie Whiteley	10997 42	I do not support additional housing in Climping as this is a village and should remain as such. The local services and road infrastructure are not able to sustain such a development.	ALPMods 456
25	Dr Ashley Levantine	61421 2	I do not support the development of the land to the east of Tye Lane Walberton.	ALPMods 425

25	Mr Michael Lovell	10977 60	I do not support the modification because the area shown as Strategic housing for Pagham/Bersted SD1, SD2 SD3 was originally identified as a 'gap between settlements'. If gaps between settlements are important then they should not be removed without reviewing other suitable sites that are not identified as gaps between settlements. For example the area around Ford Airfield which has previously been identified as able to take 5000 houses.	ALPMods 108
25	Mr Brian Sullivan	87132 8	I do not support the modification because the Planning authority are not listening to residents regarding planning approvals being given in rural areas. I believe rather than build in or on the edge of villages we should consider a significant development at Ford.	ALPMods 409
25	Mr Paul Paul Aston-Clarke	10979 50	I DO NOT SUPPORT THE MODIFICATION OF 300 MORE DWELLINGS IN CLIMPING	ALPMods 13
25	Mr Nigel Hodson	10970 27	I do not support this modification for these housing numbers in Climping, 300 houses will double the size of the village and therefore change the structure and nature of the village.	ALPMods 190
25	Mrs Veyanke Hodson	10997 59	I do not support this modification. By building a further 300+ houses in Clymping this will double the size of a small rural village. Which is not sustainable growth at all.	ALPMods 188
25	Mrs Ann F Cannings	61407 0	I fully support the comments of Walberton Parish Council.	ALPMods 273
25	Sharon Sinclair-Cottrell	11009 13	I have read the comments on the Local Plan made by Climping Parish Council which I support and endorse.	ALPMods 606
25	Simon Sinclair-Cottrell	11009 14	I have read the comments on the Local Plan made by Climping Parish Council which I support and endorse.	ALPMods 607
25	Angela Lewis	11011 26	I have read the comments on the Local Plan made by Clymping Parish Council which I support and endorse	ALPMods 653
25	Justin Espezel	11016 36	I have read the comments on the Local Plan made by Clymping Parish Council which I support and endorse	ALPMods 778
25	Monica Harris	10998 93	I have read the comments on the Local Plan made by Clymping Parish Council which I support and endorse as a whole but would like to highlight the following:	ALPMods 349
25	Kay Wagland	87131 6	I object to the 1500+ housing allocation at Ford.	ALPMods 384

25	Jos Hellier	10990 32	I object to the allocation of 300 homes within Climping as this is entirely contradictory to the agreed Neighbourhood Plan which passed through all its stages some while ago after an extended period of careful consultation.	ALPMods 69
25	Mr Alan Lovell	87117 5	I object to the allocation of 300 homes within Climping as this is entirely contradictory to the agreed Neighbourhood Plan which passed through all its stages some while ago after an extended period of careful development. If the Govt's intentions for NPs are to mean anything at all it is to ensure that the local voice is heard and acted upon. Secondly, I object to the proposed allocation of 1500 homes at Ford airfield. My main objection here is because of the totally inadequate infrastructure and particularly the highway network including the many inadequate and unsafe junctions all along the A259, Yapton Road and Church Lane/ Ford Road.	ALPMods 74
25	Mr Brian Barlow	10998 58	I object to the proposal to build 300+ new houses on prime agricultural land in Clymping.	ALPMods 333
25	Lesley Lovell	10990 51	I object very strongly to the apparent assumption that Climping village can have a further 300 houses built on to it, thus doubling the size of the village in one fell swoop!	ALPMods 71
25	Ms Elaine Cordingley	10987 59	I totally disagree with the assumptions made in the preparation of the revised Local Plan. You have presented a vastly increased figure of OAN with no substance to the calculations. The supporting evidence appears to be compiled mainly from interested parties of land ownership, Development and building.	ALPMods 36
25	Mr Gerald Rubython	10999 36	I wish to defend MM20/ Policy H SP1. TUPPERS field is an integral part and enhances the rural character of Walberton. It is an important green space at the heart of Walberton. We moved from Arundel and it is the rural feel that Walberton retains that makes it so appealing. The heart of the village as from the school.village hall ,rec ground and general approach is greatly influenced by the TUPPERS field scene. It would be a grave error to develop that site. New houses yes but in the right place. TUPPERS field is part of what is left of Walberton's rural character and mood	ALPMods 369
25	Mrs H Sprague	61605 9	I wish to object to the Mulgrave Estates plan for 300+ houses on the beautiful fields of Clymping.	ALPMods 264
25	Peter Ormiston	10998 07	I write to express my concern at the development application for the field between Horsemere Green Lane and the A259, Clymping.	ALPMods 272
25	Kevin Bolton	11011 22	I, have read the comments on the Local Plan made by Clymping Parish Council which I support and endorse	ALPMods 652

25	Marcus Bray	11011 30	I, have read the comments on the Local Plan made by Clymping Parish Council which I support and endorse and reproduce below.	ALPMods 654
25	Lucy Howard	95080 8	If the proposed main modification is to be incorporated into the adoption version of the plan and the Angmering site is to be allocated for development, the National Park Authority would seek to work closely with the District Council to deliver mitigation measures within the National Park. These measures would address issues arising from this strategic growth that impact on the purposes of the National Park.	ALPMods 544
25	A Rendle	61568 2	In my opinion no substantial planning permissions (greater than 100 houses) should be granted in the Parish of Ford until appropriate infrastructure is in place. This infrastructure will include improvements to A259 and the construction of a proper off-line bypass on the A27 at Arundel.	ALPMods 489
25	Clymping Field Protection Group (Mr David Miranda)	10997 47	It is unclear how H SP2 b, c, d, j and m are consistent with H SP2c with regards Clymping. CFPG have already objected to planning application CM/1/17/OUT as this is inconsistent with the adopted Clymping Neighbourhood Plan. This planning application would also be inconsistent with Policy H SP2 b, c, d, j.	ALPMods 170
25	Clymping Parish Council (Mrs Val Knight)	10945 54	It is unclear how H SP2 b, c, d, j and m are consistent with H SP2c with regards Clymping. CPC have already objected to planning application CM/1/17/OUT as this is inconsistent with the adopted Clymping Neighbourhood Plan.	ALPMods 526
25	Kingston Parish Council (Mrs V Knight)	61332 5	KPC strongly opposes proposal for strategic housing to be built on Site 154a, a large proportion of which lies within the Parish of Kingston.	ALPMods 536
25	Mrs Jean Hartley	10997 36	My objections to this madness are based on FLOODING, the sacrificing of GREENFIELD/RICH AGRICULTURAL LAND, an artificial housing demand, lack of JOB OPPORTUNITIES and on no plan to put adequate infrastructures in place first of all.	ALPMods 389
25	Mrs Diane Keen	11011 53	Object - With specific regard to your Local Plan intentions for the Clymping area:- I object to the allocation of 300 homes within Clymping. It is entirely contradictory to the adopted Clymping Neighbourhood Plan.	ALPMods 662
25	Mr Geoff Sadler	10987 44	Objects to the allocation at Clymping as it is contrary to the NP	ALPMods 35

25	Mr John Porter	10966 14	Objects to the allocation at Climping as it is contrary to the NP. There appears to be no planning for the essential additional infrastructure, which of course includes: medical and social care facilities, especially for the elderly, schools, recreation, public utilities.	ALPMods 33
25	Mr Tim Ward	10998 37	Objects to Tupper's Field Walberton - however it is not an allocated site there is currently a planning application.	ALPMods 302
25	Mr Richard Brennan	64402 3	Opposed development at Climping due to lack of infrastructure. Suggests brownfield land should be used first and housing should be for "I have no objection to housing development to provide houses for the couples who want to have a home to start their future and have a family, but all I see is house being built with four to five bedrooms far out of the reach of anyone locally or from outside who want to get on the housing ladder."	ALPMods 32
25	Mr Richard Brennan	64402 3	Opposed to allocations in the Inland settlements policy as there is inadequate infrastructure.	ALPMods 299
25	Mr Martyn Robinson	10997 45	Opposed to development at Climping	ALPMods 269
25	Dr David Macpherson	10997 85	Opposed to Ford and Climping allocations.	ALPMods 347
25	Mrs Anna Aston-Clarke	10968 94	Opposed to the Climping allocation	ALPMods 10
25	Mrs Barbara Edge	10997 88	Opposes allocation - Climping is in a unique position on the coast of Sussex and is renowned for this uniqueness throughout the country. The village has a large area of fertile agricultural land and it is shocking to contemplate that this could be lost for ever.	ALPMods 420
25	Mrs Josephine Jones	10997 90	Opposes allocation at BEW and suggests Ford as a new settlement.	ALPMods 275
25	Mr D Waller	61345 3	Opposes allocation at Ford	ALPMods 312
25	Mrs Rita Goidfrey	11000 72	Opposes allocation at Ford	ALPMods 435
25	Mrs Veyanke Hodson	10997 59	Opposes Climping - I do not agree with this modification. If 300+ houses are built on this field in Climping this will double the size of this small rural village, which is not sustainable growth at all. Rural villages will simply be non-existent.	ALPMods 189

25	Climping Field Protection Group (Mr David Miranda)	10984 53	Opposes Climping allocation.	ALPMods 398
25	Kaisa Miranda	10999 94	Opposes Climping allocation.	ALPMods 399
25	Mr and Mrs Gillam	61620 5	Opposes Climping allocation.	ALPMods 442
25	Mr Neil Fellingham	10993 73	Opposes Climping allocation.	ALPMods 142
25	mr simon gray	87138 2	Opposes Climping allocation.	ALPMods 280
25	Mr Timothy Bulwer	11001 91	Opposes Climping allocation.	ALPMods 480
25	mrs Jeanette Barlow	10997 83	Opposes Climping allocation.	ALPMods 254
25	mrs patricia Robinson	10995 17	Opposes Climping allocation.	ALPMods 143
25	Mrs Paula Bray	10996 20	Opposes Climping allocation.	ALPMods 605
25	Ms Susan M Olford	61610 5	Opposes Climping allocation.	ALPMods 661
25	Terry Hortin	11000 52	Opposes Climping allocation.	ALPMods 424
25	Richard Lewis	11000 54	Opposes development at Climping	ALPMods 426
25	John Halcomb	11000 74	Opposes development at Ford.	ALPMods 436
25	Mr Michael J Tu	61645 7	Opposes Ford allocation.	ALPMods 417

25	Mrs Caroline Vickers	10998 45	Opposes housing target.	ALPMods 317
25	Mr J Edge	61446 8	Opposes Inland allocation - do agree with the proposal to build 300 dwellings on the farm land to the South of Horsemere Green Lane, Climping.	ALPMods 422
25	Mrs Louise Beaton	86986 9	Opposes Inland allocations	ALPMods 404
25	Mrs Lorraine Elder	10997 92	Opposes Inland Arun allocations due to flooding	ALPMods 260
25	Angela Standing	11015 95	Opposes the allocation at Ford due to it being an unsustainable location for large-scale housing development. Major concern relates to the significant negative traffic implications of any major development at Ford.	ALPMods 755
25	Persimmon Homes (Craig Hatton)	87471 5	Persimmon Homes issue concerns the potential location of the school as stated within the draft allocation. When locating a new school, consideration should be given to a number of key factors. As part of the strategic allocation, policy SD9 for Angmering North will have to explore the potential for a primary school which serves both this allocation and the Angmering South and East draft allocation (SD11). Therefore, as the primary school is envisaged to serve two areas of development across Angmering the identification of a suitable location for this new site is the most important factor as part of the delivery of the provision.	ALPMods 491
25	Mr and Mrs Alan and Margaret Brackley	11022 17	Policy H SP 2b it is important to note the extent to which the LEGA boundary lies in Clymping. I am unaware of any improvements to the A259 proposed between Littlehampton and CLymping, whereas 1000 new homes and new businesses will inevitably worsen peak traffic issues. Indeed there are times when traffic is queued from beyond Church Lane to beyond the Bridge Road roundabout and vice-versa	ALPMods 889
25	Mr David Sawers	61352 7	Policy HSP 2C SD11 proposes that the Worthing Rugby Club ground should be used as a development site, and that development proposals should facilitate relocation of the Club. The ground is classed as a Local Green Space in the Angmering Neighbourhood Plan. Designating this land for development is not therefore legally compliant, because it conflicts with the policy of an adopted Neighbourhood Plan. It would also conflict with policy G1 SP1 of the draft Arun Local Plan, because any Local Green Space is part of the Plan's Green Infrastructure Network; and with Paragraph 76 and 77 of the NPPF.	ALPMods 788

25	Wellbeck Land Ltd	11003 51	Summary Seeks Land at Wandleys Farm for residential development The site is able to comfortably accommodate up to 170 dwellings, which would be a significant contribution to the housing delivery objectives of the District and NPPF. The site is deliverable and could provide new homes within the next five years. The site is adjacent to the strategic allocation site in Fontwell for 400 dwellings ('SD6' - Land east of Fontwell Avenue). In our view, the settlement of Fontwell has the capacity and availability of services and infrastructure to provide more than 400 out of the 20,000 dwellings which are due to come forward over the Local Plan Period. The delivery of this site, as a supplementary housing site allocation in Fontwell would achieve significantly more dwellings overall.	ALPMods 525
25	Dunhill Medical Trust	87354 9	Supports Fontwell allocation.	ALPMods 561
25	Mr Ian Truin	67011 7	The allocation of only 1500 dwellings to Ford is an outcome that is inconsistent with the development process of the ALP since 2007 to the present date	ALPMods 708
25	Mr Stuart Goodwill	65491 9	The allocation of this wider site will deliver the much needed A29 realignment which will ease congestion in the existing villages.	ALPMods 418
25	Julia Shorrocks	10990 54	The area of the strategic Climping gap should be preserved at all costs.	ALPMods 73
25	Ms Sally Williams	10997 64	The field adjacent to Loveys Road and Tack Lee Road floods whenever there is rain for a few days or more, I have seen wading birds on it. The water can get quite close to my house, the last thing we need is more concrete, it is after all a flood plain.	ALPMods 200
25	Jackson Planning for Gleeson & Langmead PS	11008 74	The joint promoters SUPPORT the inclusion of the site a Yapton, and in particular the term 'least 400 dwellings' in recognition that HELAA submissions by both site promoters pointed to a capacity of 300 in each part of the site. Minor changes requested.	ALPMods 584
25	Angmering Parish Council (Mr Rob Martin)	67083 9	The plan contains one site in Angmering that should not be Strategic and a further one that should replace it.	ALPMods 692
25	Angmering Parish Council (Mr Rob Martin)	67083 9	The Plan proposes more than doubling the number of dwellings being delivered by the existing Angmering Strategic sites, but 'inadvertently ignores' the Masterplan and status of the existing Strategic site and as a result risks underestimating the impact on existing and future infrastructure requirements through 'creative accounting'• .	ALPMods 695

25	Mr Chris Wojtalewski	61364 3	the policy for site SD10 (Climping) is considered to be not justified, effective or consistent with national policy.	ALPMods 477
25	Angmering Parish Council (Mr Rob Martin)	67083 9	The small sites letter does more than allocate the sites. It analyses where strategic sites have been allocated and makes suggested changes. It also suggests drawing up a Masterplan, linked to the previous one that looks at the delivering all suggested sites and then infrastructure to go with them.	ALPMods 676
25	Mrs Karen Haddon	10993 51	There is not a enough infrastructure in place and Climping as we know it would be gone forever	ALPMods 459
25	Mr Geoffrey M Gibbs	61601 8	There seems to be a theme in the documents about development being the key to delivering infrastructure including, as an example, that Amgmering must take even more houses than previously proposed to get a primary school. Experience in Angmering has been that this has been illusory. We were promised a new primary school in the south east of the village with the Bramley Green development and this has not yet been built. This does not seem to be a firm requirement in your plan and, in this regard, I believe your plan is not sound.	ALPMods 827
25	Mr John Richards	87471 3	These representations by Dandara Ltd support the proposed allocation of land located to the east of Fontwell Avenue in Fontwell for development within Policy H SP 2c of the Arun Local Plan 2011-31 Publication Version Main Modifications.	ALPMods 325
25	Bew Landowner Consortium	87377 6	Though fully support the allocation of the land south of Barnham Road, as part of the overall BEW site and delivery of up to 3,000 dwellings. The entire BEW allocation covers an area of approximately 272 ha and would create a new selfcontained settlement which also links to the surrounding villages of Barnham, Eastergate and Westergate. In particular, the proposed allocation would deliver up to 3,000 new homes (2,300 to 2031 and a further 700 beyond), the realignment of the A29, a new community hub, one 2 form and one 1 form entry primary schools, new sports pitches and public open space, and new employment provision.	ALPMods 675
25	Aldingbourne Parish Council	11002 87	We particularly welcome points a) and d) of Policy H SP2c (BEW SD5) which provide for retaining the unique character and separation of the 3 villages and a Linear Park following the Lidsey Rife. This has the potential to conform with the designation of the Biodiversity corridor East of Westergate in the Aldingbourne Neighbourhood Plan.	ALPMods 514

25	Rydon Homes and Gleeson Developments Ltd	11012 52	We support the allocation of strategic sites within Inland Arun as part of the strategy to meet the housing needs of the District. Also support the Strategic Site Allocation at Angmering North (SD9) which will provide at least 800 dwellings over the Plan period. Land at Angmering North is sustainably located adjacent to the existing settlement and provides excellent access, for pedestrians, cyclists and bus users, to the range of existing facilities available in Angmering. (further detailed comments - see representation).	ALPMods 674
25	D.W and J.A Feist	10996 55	We wish to voice our objection to the proposed amount of housing, especially on Grade 1 Agricultural Land, both in Clymping and Ford which is bound to impact enormously on the road network, in particular, that of the A259.	ALPMods 144
25	Mr Hamish Neathercoat	11000 62	we would like to make a representation against all the large scale development of new homes in the Arun District area, but specifically we are against SD10 (300 new homes for Climping). It should be rejected outright.	ALPMods 430
25	Chris Richards	10998 96	While it is clear that a Conservative council that stuck its feet in hard over the issue would not wish to be seen to be executing a volte face, it is clear to huge numbers of people here that there is something very wrong and troubling about this issue and the way it has been handled by ADC. The government's position is crystal clear. Brownfield before Greenfield.	ALPMods 350
25	Barton Willmore (Mr Tom Rice)	10951 96	While we support the allocation at Ford Airfield, we would like to question several points of details of the proposed modification. We do not consider these to be fundamental to the policy's soundness, but clarification would assist in providing a clearer policy.	ALPMods 581
25	Mr Tony Dixon	69567 8	Wishes to promote of the Eco Town at Ford with a new settlement of up to 5,000 houses utilising brownfield and greenfield land which is in Flood Zone 1. The proposed Arundel bypass, the south coast mainline and a waste water treatment works are all adjacent making this one of the most sustainable sites in the south east.	ALPMods 276
25	Mr Christopher Keen	11011 35	With specific regard to your Local Plan intentions for the Clymping area:- I object to the allocation of 300 homes within Clymping. It is entirely contradictory to the adopted Clymping Neighbourhood Plan.	ALPMods 657
25	Yapton Parish Council (Mr Andrew Gardiner)	94176 4	Yapton Parish Council objects to Policy HSPc Yapton (SD7) of Chapter 12 of the ADC Local Plan, specifically to the Yapton Strategic Allocation of 400 dwellings over the plan period.	ALPMods 540

25	Mr Laurence Ward	66730 8		ALPMods 616
26	Store Property Investments	87348 3	Affordable housing cannot always be provided due to viability issues surrounding development	ALPMods 565
27	Mr Robert Bean	10997 63	I hope this is the correct heading for 12.4 as there isn't a 12.4 in the drop down box. 12.4.5 The building of 2500 homes down Chalcraft Lane does the complete opposite to what 12.4.5 says.	ALPMods 199
27	Barton Willmore	92411 0	The policy text has been revised to reflect the updated evidence base. We consider that the affordable dwelling mix as set out within the policy should not be included within the policy text. This should instead refer to the dwelling mix as set out within the latest version of the SHMA. The SHMA will be updated, as deemed appropriate, over the course of the Plan period hence the percentages for affordable housing dwelling mix may become outdated very quickly. Para. 159 of the NPPF requires LPA's to identify, amongst other matters, affordable housing needs within the Housing Market Area.	ALPMods 575
27	Bognor Town Council (Sheila Hodgson)	11016 05	These comments are reflective of the Bognor Regis Town Council Neighbourhood Plan and the Planning & Licensing Committees Note modifications. BRTC fully support Affordable Housing and welcome the amendments however would seek clarification on what could be considered "non-viable". To avoid any loop holes BRTC hope the local planning authority will implement a robust stance	ALPMods 761
27	mrs cynthia weeks	10989 17	Wants housing provided to be affordable	ALPMods 115
27	Mr Robert Bean	10997 63	Where are infant and secondary pupils supposed to go? the current infacnt and secondary schools are already over subscribed	ALPMods 198
28	Angmering Parish Council (Mr Rob Martin)	67083 9	The policy does not include any policy for affordable delivery of care facilities. This is an area of dire need. These are being introduced as expensive option only available to a few.	ALPMods 775
28	Store Property Investments	87348 3	There are policy provisions for new employment sites and tourist/visitor developments outside of the Built Up Area Boundary and it is important that care facilities are not overlooked.	ALPMods 566

29	Store Property Investments	87348 3	<p>Given the limited requirement for additional pitches it is not understood why the pitches cannot be identified as part of the Local Plan as well as the existing pitches that contribute to the supply (excluding those with personal permissions).</p> <p>We strongly consider that sites with personal permissions should be excluded as these do not form part of the supply/demand analysis commissioned by the Council.</p>	ALPMods 567
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## SUMMARY SHEET

<b>CHAPTER 13 DESIGN</b>
<p>Arun's Local Plan strategic objectives for Design is:</p> <p>"To plan for climate change and work in harmony with the environment to conserve natural resources and increase biodiversity."</p> <p>"To create vibrant, attractive, safe and accessible towns and villages that build upon their unique characters to provide a wide range of uses and which are a focus for quality shopping, entertainment, leisure, tourism and cultural activities."</p> <p>"To plan and deliver a range of housing mix and types in locations with good access to employment, services and facilities to meet the District's housing requirements and the needs of Arun's residents and communities both urban and rural, ensuring that issues of affordability and the provision of appropriate levels of affordable housing are addressed while supporting the creation of integrated communities."</p>
<b>DESCRIPTION OF MAIN CHANGES TO SECTION</b>
<p><b>Policy ECC SP2, point A</b></p> <p>As a result of the publication of the New National Technical Standards, the Council would recommend that the following minor amendment is made to 'point a' of this policy.</p> <p><b>Policy ECC DM1</b></p> <p>Repetition; these policy requirements are covered in other policies in the plan</p>
<b>MAIN MODIFICATIONS IN SECTION</b>
<p><b>Policy ECC SP2, point A</b></p> <p>a) Achieve energy efficiency measures that reflect the <u>current</u> standards in <del>Part L of the Building Regulations (or any documentation which supersedes this), or the level of the Code for Sustainable Homes or appropriate BREEAM rating</del>, applicable at the time of submission;</p> <p><b>Policy ECC DM1</b></p> <p>Delete criteria c, d, e, g and last sentence: <del>Schemes falling within landscape....</del></p>
<b>NUMBER OF REPRESENTATIONS (Who from; Support / oppose; Statutory Consultees)</b>
<p>Four representations were received. These supported the reference to climate changes, commented on nationally prescribed standards.</p>
<b>SUGGESTED CHANGES</b>
<p>No suggested changes but Bourne Leisure objection to be reviewed.</p>

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
30	Clymping Parish Council (Mrs Val Knight)	1094554	CPC supports Policy D SP 1 Design policy.	ALPMods527
30	Mr Henry Stamp	874646	I support changes proposed to Policy D SP1 but wants some of the supporting text put back in.	ALPMods538
30	Mr and Mrs Alan and Margaret Brackley	1102217	I support Policy D SP1 Design policy	ALPMods890
30	Climping Field Protection Group (Mr David Miranda)	1099747	MM30 CFPG supports Policy D SP 1 Design policy.	ALPMods169
30	Bourne Leisure Ltd	1099192	Objects to the following proposed addition to Policy D SP1 (MM30): "With large scale developments, in addition to a Design and Access Statement, a context appraisal, context plan and analysis of the site will also be required"	ALPMods831
30	Mr Derrick Chester	613857	Policy D SP1 I would suggest that the design policy should also contain the requirement that new development should 'reflect and enhance local heritage'. For example a local characteristic in parts of Littlehampton are flint walls and flint exteriors of buildings. New development, particularly within these areas, offers the opportunity to create more of these much loved features.	ALPMods55
30	Bognor Town Council (Sheila Hodgson)	1101605	These comments are reflective of the Bognor Regis Town Council Neighbourhood Plan and the Planning & Licensing Committees Note modification and SUPPORT	ALPMods762

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
30	Barton Willmore	924110	We do not consider that a context appraisal, context plan and site analysis should be required as separate planning application documents in addition to a Design & Access Statement. These aspects of local character and site analysis are prevalent within Design & Access Statements or as such are covered by other documentation within a planning application submission, including the Planning Statement which will address those aspects of a site appraisal.	ALPMods576
31	Barton Willmore	924110	Support - We support the reference to Nationally Described Standards to be used as guidance only regarding internal space standards, whilst acknowledging that development will also be encouraged to make the most efficient use of land. This ensures that a pragmatic approach is taken to internal space dimensions of dwellings, accounting for site specific constraints and design and layout considerations	ALPMods577
32	Aldingbourne Parish Council	1100287	Policy ECC SP1 (Adapting to climate change) makes reference to development needing to account for flooding and drainage. This places solutions in the hands of developer design rather than Local Plan design. We know that this does not work. Developers will always argue in favour of the best case scenario but it is well known that this part of the country is subject to Isostatic bounce causing the coastline to fall relative to that of Scotland, as well as the twin problems of rising sea levels and predicted more extreme weather events.	ALPMods510
32	Mr Derrick Chester	613857	Policy ECC SP2 I am not sure the wording on renewable energy is tight enough. I have noticed that planning applications coming forward at present rely on a 'fabric first' approach rather than seeking to incorporate measures such as solar panels and grey water harvesting. We are in an area with high levels of sunshine, wind and tides. We need to use renewable energy to a much greater extent.	ALPMods56
33	Bourne Leisure Ltd	1099192	Objects to the main modification of Policy ECC DM1 at MM33, which proposes to delete points c -g and the closing three lines of policy ECC DM1	ALPMods830

## **CHAPTER 14 Health, Recreation and Leisure**

This chapter sets out an overarching Strategic policy for health and wellbeing to ensure that development maximises the impact it can make to promoting healthy communities and reducing health inequalities. It then sets out a Development Management policy for dealing with the protection of open space, outdoor sport, community and recreation facilities; open space and recreation in new developments; and also the protection of indoor sport, community, arts and cultural facilities.

### **DESCRIPTION OF MAIN CHANGES TO SECTION**

Main changes to this section are rewording of Policy and supporting text to reflect the updated evidence base and the removal of the Technical Appendix and commitment to the preparation of a Supplementary Planning Document (SPD) setting out the methodology for providing open space, playing pitches and built sports facilities.

### **MAIN MODIFICATIONS IN SECTION**

MM34 – amendment for clarity.  
MM35 – amendment to include community buildings.  
MM36 – amendment for clarity.  
MM37 – Commitment to the preparation of a Supplementary Planning Document (SPD) setting out the methodology for providing open space, playing pitches and built sports facilities.  
MM38 – Reworded section 1 of Policy to reflect evidence base.  
MM39 – Reworded section 2 of policy to reflect evidence base.  
MM40 – Deletion to reflect evidence base.  
MM41 – Reworded heading to cover indoor sport, arts and cultural facilities.  
MM42 – Deletion – SPD to add detail.  
MM43 – Reworded heading to cover community facilities.  
MM44 – Deletion of paragraph – independent studies not supported.  
MM45 – Deletion of paragraph – independent studies not supported;. And renumbering.  
MM46 – Removal of reference to Technical Appendix.

### **NUMBER OF REPRESENTATIONS (Who from; Support / oppose; Statutory Consultees)**

15 representations were received on Chapter 14 Health, Recreation and Leisure.

Residents commented upon a number of issues including the definition of open space; lack of mention of creating formal parks; general support for Policy HWB SP1; and that new facilities in developments should provide relocation opportunities for existing sports clubs in inadequate accommodation.

Climping Parish Council considers the definition of open spaces is too narrow and should also refer to free access to the countryside and coast given the importance of the visitor economy. They also support Policy HWB SP1 although notes the A259 is lacking in safe crossing points.

Similarly, Climping Field Protection Group (CFPG) considers the definition of open spaces is too narrow and should also refer to free access to the countryside and coast given the importance of the visitor economy.

Angmering Parish Council would like to see an explanation in the supporting text of what an

SPD is.

Sussex Wildlife Trust are pleased to see that ensuring low quality, highly valued open spaces are prioritised for enhancement however, it is not clear how low quality will be assessed or what type of enhancements will be promoted.

CPRE suggest that the provision of healthcare facilities should be addressed more comprehensively through policy requirements that are currently proposed by the plan.

The Theatres Trust supports Policy OSR DM1 as the modifications proposed maintain the aim.

Bognor Regis Town Council consider the comments are reflective of the Bognor Regis Town Council Neighbourhood Plan.

Bourne Leisure Ltd objects to the proposed modification MM39 as the company considers Policy OSR DM1 should not require commercial developments to contribute to the provision of additional open space, sport and recreation facilities.

SPORT ENGLAND – Sport England note that the Local Plan has allocated land for playing pitches where appropriate within the housing allocations. However, they strongly encourage the council to qualify this further, either by allocating a specific amount of land required, or by specifying what size these pitches are expected to be..

#### **SUGGESTED CHANGES**

Add definition of Supplementary Planning Document (SPD) from National Planning Policy Framework (NPPF) to the Glossary.

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
34	Climping Parish Council (Mrs Val Knight)	1094554	CPC feels that the definition of open spaces in paragraph 14.1.1. is too narrow given the specific meaning of open space• in planning terms. CPC supports the intent but feels that paragraph 14.1.1 should also refer to free access to the countryside and coast given the importance to the visitor economy.	ALPMods528
34	Mr and Mrs Alan and Margaret Brackley	1102217	I feel that the definition of open spaces in paragraph 14.1.1. is too narrow given the specific meaning of "open space" in planning terms. I support the intent but feel that paragraph 14.1.1 should also refer to free access to the countryside and coast given the importance to the visitor economy	ALPMods891
34	mr richard rabbett	1099854	I note that despite the idea of building some 4000 extra houses in Bersted and Paghham, these areas taking the lion's share of the land-rape, thew was, and remains, absolutely no reference to creating formal parks. Are these housing expanses to become concrete slabs, sink estates, where the closest a child gets to a playground is a picture on their wall?	ALPMods364
34	Climping Field Protection Group (Mr David Miranda)	1099747	MM34 CFPG feels that the definition of open spaces in paragraph 14.1.1. is too narrow given the specific meaning of open space• in planning terms. CFPG supports the intent but feels that paragraph 14.1.1 should also refer to free access to the countryside and coast given the importance to the visitor economy.	ALPMods173
36	Sport England (Laura Hutson)	617073	Having reviewed your modifications, I am happy to withdraw Sport England's previous objections as I can see that my predecessor's comments have been taken into account and the policies adjusted accordingly. In particular, the removal of standards in terms of playing pitch provision for new development is welcomed. I note that there is now a recent Playing Pitch Strategy in place which will form a robust part of this document's evidence base; this was developed in conjunction with Sport England guidance.	ALPMods5
36	Climping Parish Council (Mrs Val Knight)	1094554	CPC supports Policy HWB SP1 with a wider definition of open space as in MM34. It should be noted that safe crossing points of the A259 are currently lacking for cyclists and pedestrians wishing to access the countryside and coast south of A259 in Clymping Policy (HWB SP1 a).	ALPMods529
36	Mr Alan Brackley	1102147	Support for Policy HWB SP1	ALPMods877

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
37	Angmering Parish Council (Mr Rob Martin)	670839	There is no explanation of what an SPD is.	ALPMods776
38	Sussex Wildlife Trust	615795	14.1.14 We are pleased to see that ensuring low quality, highly-values open space sites are prioritised for enhancement is a strategic priority. However it is not clear how low quality will be assessed or what type of enhancements will be promoted. There needs to be recognition in section 14 that any assessment of open space relates to all the public benefits that open space can provide, which a balance being achieved between them all.	ALPMods592
38	Mr Edmund Camerer Cuss	673991	My Rep concerns MM 38, relating to Policy OSR DM1 of the March 2017 Arun Local Plan 2011-2031, which I think is insufficiently precise, and would be more positively complete and more effective if a short phrase was added at OSR DM1.1, the opening policy wording, as follows: Existing open space, outdoor sport, community and recreational buildings and land, including playing fields, should not be built on or suffer adverse impact from nearby development that would undermine the operation of the facilities unless: a), b), c) etc.	ALPMods279
38	CPRE Sussex (Mrs Kia Trainor)	1099823	The level of housing being delivered within the strategic sites would potentially overwhelm any spare capacity of existing healthcare facilities, and therefore the provision of healthcare facilities should be addressed more comprehensively through policy requirements that currently proposed by the plan.	ALPMods859
38	Theatres Trust (Mr Ross Anthony)	143529	The Trust generally supports Policy OSRDM1 as it does seek to safeguard and protect essential community and cultural facilities, as required by para 70 of the NPPF. The modifications proposed maintain that aim.	ALPMods118
38	Bognor Town Council (Sheila Hodgson)	1101605	These comments are reflective of the Bognor Regis Town Council Neighbourhood Plan and the Planning & Licensing Committees Note modification and SUPPORT Note: The same goes for MM39; MM40; MM41; MM42; MM43; MM44 and MM45	ALPMods763
39	Bourne Leisure Ltd	1099192	Bourne Leisure objects to the proposed modification at MM39 The Company considers that Policy OSR DM1 should not require commercial developments to contribute to the provision of additional open space, sport and recreation facilities as is proposed in the statement: Housing and, where viable, commercial development will be required to contribute towards...	ALPMods832

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
39	Mr Derrick Chester	613857	Policy OSR DM1. open space, sport and recreation. The provision of new sports pitches and club houses is welcome however I have noticed that they tend to be given little consideration until it is time for them to be built and then there is a scramble to find out who wants to use them and run them. I would suggest an alternative approach. New facilities in new development should look to provide relocation opportunities for existing sports clubs hosted in inadequate accommodation in some cases preventing them from taking up promotion to higher leagues when this opportunity is achieved. Let us be proactive by incorporating this opportunity for clubs within the policy.	ALPMods57

## CHAPTER 15 Transport

This section sets out the transport options for the Local Plan as well as development management policies for parking.

### DESCRIPTION OF MAIN CHANGES TO SECTION

Due to the change to the strategy and the increase in housing development the transport section was updated through the updated district wide Arun Transport Assessment 2016. The updated study was referenced in the supporting text through Minor modifications.

Major Modifications were made to the policies to update highway schemes involving updating , deleting completed schemes and reflecting new schemes.

The improvements needed to accommodate new strategic development are included in the specific allocations policies. See chapter 8 for employment allocations and chapter 12 for housing allocations.

### MAIN MODIFICATIONS IN SECTION

MM47 –T SP1 g Railway crossing at Ford - 34 comments

T SP3

MM48 – T SP3e Enterprise Bognor Regis link Road (renamed as the link road has been partially built)

MM49- T SP3 A259 Roundstone Bypass Improvement – move to committed

MM50 - T SP3 Lyminster Bypass (Northern Section, move to committed

MM51 - T SP3 A259 Bognor Regis relief road (deleted as complete)

MM52 - T SP3 Bridging Railway line at Ford

### NUMBER OF REPRESENTATIONS

MM47 –T SP1 g Railway crossing at Ford - 34 comments

MM48-52 , T SP3 – 20 comments

The comments on this section either made general comments about the capacity of the roads, traffic congestion and how this will be exacerbated by the planned new development or made particular observations about certain roads.

The Bognor Regis by pass was mentioned for the fact that it currently brings traffic into the town as the by pass has not been completed so it does not function as a bypass and causes congestion and air pollution.

The future A27 Arundel bypass improvement is both favoured and opposed. A number of comments felt that by highlighting the possible bypass it pre-determines this highways improvement. A number of comments including Climping Parish Council noted that if the bridge at Ford only works if it connects to the A27.

Comments encouraged ADC to promote sustainable forms of transport. Sustrans indicated work that themselves and WSCC are undertaking that could be reflected in the Local Plan.

It should be noted that subsequent to publishing the Main Modifications, as set out in the WSCC comments, the Secretary of State announced that the A27 Chichester bypass major scheme has been cancelled and although work is still taking place to explore options with the local community, a major scheme now appears less certain.

WSCC, Highways England and Chichester District either in this section or against specific allocations indicated that although the District wide Arun Transport Study 2016 had been signed off the loss of the Chichester Bypass A27 major scheme and through emerging detailed information accompanying current large planning applications in Arun and Chichester District there would need to be further work to understand and consolidate the specific transport improvements needed to accommodate this. This work is being undertaken through the Enterprise Bognor Regis Local Development Order Transport study and development update.

NB: this study has been commissioned by ADC and will be completed in August 2017.

#### **SUGGESTED CHANGES**

The current transport schemes and their commitment may need to be included as updates through the course of the examination.

The supporting text should refer to and include the findings from the Enterprise Bognor Regis Local Development Order Transport study and development update.

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
47	Mr Hartley Elder	1099358	A 29 improvements. We currently have the Bognor Regis bypass which brings traffic into the town "this has to be an oxymoron; a bypass should keep traffic out of the town surely? The A29 improvement will exacerbate the problem if it allows traffic to come through Shripney (narrow roads with bends) and then dumps it onto the current farce of a bypass.	ALPMods225
47	Ms Lynette Gill	614471	A mass development west of Bognor will cause congestion and traffic chaos in the whole area. There is very little employment sufficient to sustain homeowners in the area meaning outsourcing to other towns locally or further afield. The nearest rail link is in Bognor. The roads are already congested. The A27 is no longer a priority to improve. This will impact on pollution, congestion and adversely affect the quality of life of those currently living in the area.	ALPMods474
47	Clymping Parish Council (Mrs Val Knight)	1094554	A27 Arundel bypass is key to improving the transport network across the District (8.1.4) and therefore the attractiveness of Arun as a location for new business investment. Policy T SP 1 Transport and Development item g (railway bridge at Ford) only works if it connects to a new A27 Arundel bypass, otherwise it will cause severe disruption at the Ford Road/ A27 junction at Arundel and at the Church Lane A259 junction in Clymping. It would be one of the shortest links between the A259 and A27.	ALPMods530
47	Mr Colin Hamilton	1093041	Concerned about a number of named junctions in the district and the affect an additional 4000 cars will have	ALPMods39
47	Mr Ian Truin	670117	Concerned about additional traffic as a result of additional housing and requests a master-plan for the Ford scheme	ALPMods712
47	Mr Derrick Chester	613857	Concerned about transport and various observations about local road capacity.	ALPMods62
47	Cliff/Cheryll Brown	1093662	Concerns over increased traffic as a result of the new developments.	ALPMods4

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
47	Sussex Wildlife Trust	615795	Do not consider that the strategic priority of helping to facilitate the A27 Arundel bypass is in line with the strategic objectives listed at the beginning of the Chapter. Goes on to say that to single out one transport option over all others completely contradicts the first statement in Policy T SP1. Consider that rail is barely mentioned and that promoting the Arundel bypass and safeguarding a specific route in T SP3 demonstrates the Duty to Cooperate as the pink/blue route will have significant impacts on the National Park and conflicts with the SDNP Authorities Position Statement on A27 route corridor.. Finally states DEFRA guidance on new roads within National Parks and concludes that It is premature for Arun District Council to promote this transport option over all others.	ALPMods593
47	Mr Darrell Latimer	110111 1	Each household could have 2 or 3 cars which adds up to an extra 5,000/7,500 vehicles on our local roads. This area is slowly being built over and will end up more congested that it is today which is pretty bad.	ALPMods649
47	A E Peake	109983 2	I strongly object to parts of these plans MM47 policy TSPI, the traffic backs up a long way trying to get out of Bognor - junction of A259 and A27.	ALPMods296
47	Mr Keith Meadmore	109922 2	If SP1 and SP3 is the full extent of the final revised / modified proposals, then these are not adequate given the substantive changes that have occurred since the 2014 published version. In 2014 the A27 Chichester By-pass and junction improvement proposals were anticipated and the then Local Plan was prepared in the context such highways improvements would facilitate the then proposed developments.	ALPMods161
47	Angmering Parish Council (Mr Rob Martin)	670839	Inaccurate output will result in unreliable requirements/costing of local road infrastructure in regard to Angmering, by the Arun Infrastructure Capacity Study & Delivery Plan (ICSDP) 2016.	ALPMods683
47	Mr Chris Sprules	109903 8	Increased Cycling and Walking will improve the environment, Air quality, Peoples Health, stress levels, quality of life and needs to more fully threaded through the ADC Local Plan. this could be better supported in the Local Plan	ALPMods70
47	Mr Stephen Lias	928750	It would be common sense to re-route the A29 east of Westergate, Lidsey and Shripney to join the new A259	ALPMods845

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
47	Mr David Miranda	109974 7	MM47 Paragraph 15.1.3 states the A27 Arundel bypass is a strategic priority for Arun DC without indicating the impact on the proposed Local Plan should it not be delivered (T SP1 g). It is key to improving the transport network across the District (8.1.4) and therefore the attractiveness of Arun as a location for new business investment.	ALPMods174
47	Climping Field Protection Group (Mr David Miranda)	109974 7	Policy T SP 1 Transport and Development item g only works if it connects to a new A27 Arundel bypass, otherwise it will cause severe disruption at the Ford Road/ A27 junction at Arundel and at the Church Lane A259 junction in Clymping. It would be one of the shortest links between the A259 and A27. MC213. This refers to paragraph 15.1.3 and simply underlines the critical import of the A27 Arundel bypass to the delivery of the Vision and Objectives of this Local Plan.	ALPMods179
47	Yvonne Hickmore	109982 7	MM47 TSPI the traffic problems that another estate of houses would make. Even now, each morning, traffic backs up trying to firstly get out of Bognor (the new by-pass is great for people from Felpham), then again it queues at the junction of the A259 and A27. Therefore this proposed plan does not meet the needs of the area.	ALPMods288
47	mr simon gray	871382	Need to reduce the need to travel.	ALPMods266
47	Mr and Mrs Alan and Margaret Brackley	110221 7	Paragraph 15.1.3 states the A27 Arundel bypass is a strategic priority for Arun DC without indicating the impact on the proposed Local Plan should it not be delivered. (T SP1 g). It is key to improving the transport network across the District (8.1.4) and therefore the attractiveness of Arun as a location for new business investment. T SP 1 Transport and Development item g only works if it connects to a new A27 Arundel bypass, otherwise it will cause severe disruption at the Ford Road/A27 junction at Arundel and at the Church Lane A259 junction in Clymping, where lengthy hold-ups and disruptions regularly occur. It would be one of the shortest links between the A259 and A27.	ALPMods892
47	Mr Michael Hampton	109973 8	The Developments proposed, particularly at Pagham and Bersted do not accord in any measure with your policy which highlights reducing the need to travel and using sustainable travel solutions.	ALPMods214
47	Mr gary smith	109801 7	The local road network cannot cope with additional development.	ALPMods21

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
47	Sustrans (Mr John Coote)	676198	The only reference to the completion of the National Cycle Network in Arun has been deleted. It is noted that the Littlehampton to Arundel Green Link is covered in detail in a specific policy. In a year in which Sustrans is carrying out a fundamental review of the National Cycle Network, and WSCC is scheduled to carry out feasibility work on route 2 across the county, Sustrans would like to see the aspiration to complete route 2 across Arun remain in the Local Plan.	ALPMods393
47	Angmering Parish Council (Mr Rob Martin)	670839	The policy of encouraging bridges over the railway line is to be encouraged, it fits with the suggestion to include Roundstone Farm as a strategic site. The '...particularly at Ford' is unnecessary - or is it a pre-determination again? Make policy more general -take out the last few words	ALPMods777
47	Mr John Gibson	109977 5	The proposed homes at Greater Bognor allocation due to congestion.	ALPMods237
47	Mr Mike Lambourne	109935 0	The quote above:"15.1.2 These issues have far reaching impacts upon the District's economy, environment, health and wellbeing as well as adjoining Local Planning Authorities and are likely to become more significant over the Plan period as a result of development. These will be planned for during the course of this plan period and may be delivered in the future. " Should read at the end "...and MUST be delivered in the future." So as it stands, is not viable or effective.	ALPMods146
47	Mr Christopher Keen	110113 5	The recent Transport Study which seems unrealistic in its conclusions on what 'mitigation' measures (or highway improvements) would be necessary to deal satisfactorily with the almost sixteen thousand new homes proposed for Arun from now to 2031. The measures suggested are hopelessly inadequate.	ALPMods658
47	Mr David Myers	699962	The road infrastructure plans are fundamental in bringing together ADC's strategic vision for employment, housing, leisure and retail in Bognor Regis. The main road initiatives: BRNRR link road into the Lec Airfield site, A29 realignment, and A27 improvements need to be aggressively pursued to ensure that future economic growth is not adversely impacted.	ALPMods548
47	Mr Ian Francis	109975 8	The Transport chapter needs serious reconsideration including a comprehensive impact analysis of the additional traffic on the already overloaded roads from West wittering to Middleton-on-sea.	ALPMods231
47	Mrs June Hamilton	109986 0	The whole of the Arun Transport section of the plan needs re-writing. I live on the Lower Bognor Road so am only too familiar with the terrible flooding that occurs along it, and with the way it is grid-locked for four-five hours every weekday.	ALPMods372

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
47	Bognor Town Council (Sheila Hodgson)	1101605	These comments are reflective of the Bognor Regis Town Council Neighbourhood Plan and the Planning & Licensing Committees Note modification and SUPPORT	ALPMods767
47	Littlehampton Town Council (Mr Peter Herbert)	869431	This policy does not provide the details required. It is not good enough to say that improvements "will be planned for during the course of the plan period and MAY be delivered in the future" and greater correlation with the strategic housing sites is necessary. specific examples are suggested.	ALPMods101
47	Mrs Jane Collins	1098918	This policy is to ensure growth, reduce congestion and improve transport links and contribute to highway improvements. The number of houses proposed in the Pagham & Bersted area will result in increased congestion.	ALPMods81
47	Mrs Vicky Hennessy	1101068	TSPI. Road proposals are not adequate to reduce congestion.	ALPMods629
47	West Sussex County Council (Darryl Hemmings)	613347	WSCC comment about their support for Arun District Council with the preparation of the Arun Transport Study for Strategic Development and consider that in-principle, subject to delivery of various mitigation measures, the proposed strategic developments could come forward without leading to severe impacts on the transport network. We acknowledge the positive and collaborative approach that has been taken to this work, to date. We are keen to continue this approach as we consider this will help to deliver the best outcomes for our residents.	ALPMods819
48	Bersted PC (Mrs Debbie Holcomber)	1098152	The A259 route was changed following the Policy Site Six developments at Bersted and Felpham to include the Bognor Regis Northern Relief Road. This has brought a considerable amount of additional traffic to Bersted and has resulted in delays at roundabouts, pollution, queues to leave the retail park which joins the A259, etc.	ALPMods360
48	Mrs Kia Trainor	1099823	We would like to see further information about how the provision and funding for new road infrastructure links to the housing trajectory and what mechanisms will be used if funding is unavailable (such as CPO etc) recognising that the last bid for EZ status was unsuccessful and other bids may also not be fruitful	ALPMods857
49	Mr Robert Bean	1099763	The A259 Bognor Regis Relief Road needs to be re-instated on the list of improvements to be made since it is already inadequate, let alone before an extra 2500 homes are built	ALPMods201

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
49	Sustrans (Mr John Coote)	676198	The A259 Roundstone Bypass Improvement is listed as a committed scheme. The report following the public consultation (August 2016, paragraph 1.3.3) identifies 8 issues and concerns, both technical and strategic, that need to be addressed. Many of these are fundamental to the viability of the scheme, to the extent that the scheme should properly be listed as subject to redesign, and further consultation and approval.	ALPMods395
50	Mr Barnabas Brown	1097316	I do not believe that committing to the Northern Section of the Lyminster-by-pass is legally compliant, nor sound, and that there has been little/non-existent duty to cooperate with affected residents.	ALPMods375
50	Mr Gareth Coombes	1098361	I do not believe that committing to the Northern Section of the Lyminster-by-pass is legally compliant, nor sound, and that there has been little/non-existent duty to cooperate with affected residents.	ALPMods26
50	Mr Oliver Roberts	1101868	I do not believe that committing to the Northern Section of the Lyminster-by-pass is legally compliant, nor sound, and that there has been little/non-existent duty to cooperate with affected residents.	ALPMods814
50	Mrs Caroline Serra	1099958	I do not believe that committing to the Northern Section of the Lyminster-by-pass is legally compliant, nor sound, and that there has been little/non-existent duty to cooperate with affected residents.	ALPMods380
50	Ms Maya Kelsey-Wills	1101855	I do not believe that committing to the Northern Section of the Lyminster-by-pass is legally compliant, nor sound, and that there has been little/non-existent duty to cooperate with affected residents.	ALPMods809
50	Miss Penelope Roberts	1101867	I do not believe that committing to the Northern Section of the Lyminster-by-pass is legally compliant, nor sound, and that there has been little/non-existent duty to cooperate with affected residents. Quite simply, the Local Plan needs changing to remove the status of committed• to the Northern Section of the Lyminster-by-pass. It has not even received planning permission.	ALPMods813
50	Mr Grant Roberts	1101857	I do not believe that committing to the Northern Section of the Lyminster-by-pass is legally compliant, nor sound, and that there has been little/non-existent duty to cooperate with affected residents. Quite simply, the Local Plan needs changing to remove the status of committed• to the Northern Section of the Lyminster-by-pass. It has not even received planning permission.	ALPMods810

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
50	Mr James Roberts	1101861	I do not believe that committing to the Northern Section of the Lyminster-by-pass is legally compliant, nor sound, and that there has been little/non-existent duty to cooperate with affected residents. Quite simply, the Local Plan needs changing to remove the status of committed• to the Northern Section of the Lyminster-by-pass. It has not even received planning permission.	ALPMods811
50	mr Nigel Coombes	1097920	I do not believe that committing to the Northern Section of the Lyminster-by-pass is legally compliant, nor sound, and that there has been little/non-existent duty to cooperate with affected residents. Quite simply, the Local Plan needs changing to remove the status of committed• to the Northern Section of the Lyminster-by-pass. It has not even received planning permission.	ALPMods12
50	Mrs Jessica Coombes	1101847	I do not believe that committing to the Northern Section of the Lyminster-by-pass is legally compliant, nor sound, and that there has been little/non-existent duty to cooperate with affected residents. Quite simply, the Local Plan needs changing to remove the status of committed• to the Northern Section of the Lyminster-by-pass. It has not even received planning permission.	ALPMods806
50	Mrs Melanie Roberts	1101864	I do not believe that committing to the Northern Section of the Lyminster-by-pass is legally compliant, nor sound, and that there has been little/non-existent duty to cooperate with affected residents. Quite simply, the Local Plan needs changing to remove the status of committed• to the Northern Section of the Lyminster-by-pass. It has not even received planning permission.	ALPMods812
50	Mrs Wendy Coombes	1101849	I do not believe that committing to the Northern Section of the Lyminster-by-pass is legally compliant, nor sound, and that there has been little/non-existent duty to cooperate with affected residents. Quite simply, the Local Plan needs changing to remove the status of committed• to the Northern Section of the Lyminster-by-pass. It has not even received planning permission.	ALPMods807
50	Ms Tracey Frampton	1101850	I do not believe that committing to the Northern Section of the Lyminster-by-pass is legally compliant, nor sound, and that there has been little/non-existent duty to cooperate with affected residents. Quite simply, the Local Plan needs changing to remove the status of committed• to the Northern Section of the Lyminster-by-pass. It has not even received planning permission.	ALPMods808

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
50	Mr Colin Hamilton	109304 1	While the A259 is clearly the main route from Greater Bognor area to Chichester and the west, a huge number of vehicles use the Lower Bognor Road and Pagham Road becoming the B2166 which then becomes the B2145. The A259 and these routes suffer the same critical problem caused by the Chichester bypass. The addition of large number of dwellings south of Chichester will exacerbate this problem in a very big way. It is therefore extraordinary that the B2166/2145 have not even been mentioned in the local plan (or the Arun Transport Study). I submit that housing developments should not be approved until this major problem has been solved.	ALPMods79
52	Mr Derrick Chester	613857	Concerned about transport and various observations about local road capacity.	ALPMods61
52	Mr Ian Truin	670117	The bridging of the railway at Ford has scant justification in the Plan and has no consideration of "what if" scenarios for its basic construction or for the possibilities it can open up. It may be possible to open up further development potential in the Ford area whilst diverting traffic away from the A259 through Littlehampton and the A29 to the A27. There is no IDP funding included.	ALPMods713

## CHAPTER 17 Natural Environment

This chapter covers nature conservation throughout the District, from the designated through to the non-designated. Policy ENV DM2 is specifically included to ensure the necessary mitigation to ensure there is no impact to the designated site of Pagham Harbour to result from the increased populace.

### DESCRIPTION OF MAIN CHANGES TO SECTION

A range of major and minor modifications have been put in Chapter 17. The Main modifications generally included insertion or removal of words and sentences from policies for clarity, apart from that to Policy ENV DM3 which involved a complete rewrite.

Minor modifications involved removal of paragraphs and parts of paragraphs reflecting the current stage, for clarity or new information during the suspension period.

### MAIN MODIFICATIONS IN SECTION

MM53 Policy ENV SP1 – insertion reflecting SA recommendation  
MM54 Policy ENV DM1 – amendment reflecting advice  
MM55 Policy ENV DM2 – addition of reference to strategic approach  
MM56 Policy ENV DM2 – reflecting HRA recommendation  
MM57 Policy ENV DM3 – widening policy scope to non-designated sites

And complementary to this chapter

MM72 Policy Maps Pagham Harbour buffer zone changed for accuracy  
MM73 Policy Maps Pagham Harbour buffer zone updated for accuracy

### NUMBER OF REPRESENTATIONS (Who from; Support / oppose; Statutory Consultees)

There have been 21 comments against this chapter, with are focused on the first couple of parts and none on the last two, reflecting the modifications.

Comments came from Natural England (NE), Sussex Wildlife Trust (SWT) and from CPRE Sussex. NE support MM55 to include reference to requirements to make contributions to the strategic approach to access management at Pagham Harbour and a number of points against the minor modifications. SWT objects to MM53 and request it is changed back and are disappointed about MM54 as consider impacts of developing land adjacent to a biodiversity site is no longer a requirement. Further considers that it is short sighted to only cover existing sites. CPRE will consider any further comments after consideration but feel that paragraph 17.1.27 should be made into a policy.

There were representations from Pagham (PPC), Climping Parish Councils (CPC), Ferring Conservation Group (FCG) and Clymping Field Protection Group (CFPG), plus some residents. CPC support MM53 considering it to be important to the rural setting and character of Clymping and so do CFPG. FCG supports MM57. The residents all object to the modifications considering they will be detrimental to the natural environment and biodiversity. PPC has mixed comments that object to MM53: MM55; MM1 or MM57. However, although supporting MM54 in principle wants to point out that contributions cannot replace priceless habitat and are disappointed 'land adjoining' has been removed.

Finally there a comment on ENV DM2 from a developer. These related to a difference between the modification in the document and that in the table and considering that management measures incorporated into development should be taken into consideration.

### **SUGGESTED CHANGES**

The following further minor modifications be inserted in response to representations.

The following minor addition be made to paragraph 17.1.26 following MC255 as suggested by NE (ALPMods329):

“Loss of habitat within these impact risk zones, which is regularly used by foraging Bewick's swans (ie is functionally linked to the SPA), could have a significant effect on the SPA, and will need assessment under the Habitats Regulations at the project level”

MC253 be moved to paragraph 17.1.25 as follows, for clarity and to comply with NE's request:

“...hydrological unit. The site is designated due to the little Ramshorn whirlpool snail Anisus vorticulus. Although the ...”

Finally, the recommended amendment to Policy ENV DM1 be accepted to include reference to any subsequently designated sites, as follows:.

"...Importance as listed in Tables 17.1-17.67, or any subsequently designated sites (either individually...."

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
53	Sussex Wildlife Trust	615795	17.1.8 "The final line in this paragraph doesn't make sense and the Trust is not clear what statement it is trying to make. Perhaps it should simply reflect NPPF paragraph 118 which states that potential SPAs and possible SACs should be given the same protection as European sites.	ALPMods595
53	Clymping Parish Council (Mrs Val Knight)	1094554	CPC supports policy ENV SP1. It is important to the rural setting and character of Clymping.	ALPMods532
53	Mr and Mrs Alan and Margaret Brackley	1102217	I support policy ENV SP1. It is important to the rural setting and character of Clymping	ALPMods893
53	Climping Field Protection Group (Mr David Miranda)	1099747	MM53 CFPG supports policy ENV SP1. It is important to the rural setting and character of Clymping.	ALPMods175
53	Mrs Mary Cook	1099104	Pagham harbour is a designated site featuring rare birds and nesting sites my understanding is therefore that Arun is not allowed to build a large development close to it., so why is the site even being considered	ALPMods88
53	Pagham Parish Council (Miss Nicola Jones)	934572	Pagham Parish Council does not support this modification. Policy ENV SP1 the word conservation has been cut out. Biodiversity is maintained by conserving the natural environment so that organism can thrive. Preservation on its own is reminiscent of museum and specimens picked in jars. The loss of paragraph 17.1.2 is regrettable	ALPMods121
53	Sussex Wildlife Trust (Jess Price)	615795	Policy ENV SP1 " The Trust objects to "conservation" being changed to "preservation" and request that it is changed back. Although the words have similar meanings, the NPPF refers to conserving the natural environment and preserving the historic environment.	ALPMods594
53	Mrs Anna Aston-Clarke	1096894	There is little mention in this document of 'agriculture' but it has for many years been part of our environment in the district. Agricultural land should be protected.	ALPMods109

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
54	Sussex Wildlife Trust (Jess Price)	615795	ENV DM1 “ The Sussex Wildlife Trust is disappointed to see that consideration of the impacts of developing land adjacent to a site of biodiversity importance is no longer a requirement of this policy. Paragraph 118 of the NPPF refers to significant harm resulting from a development, it does not specify the location of the development. Additionally, it is short sighted to only reference existing sites of biodiversity or geological importance. Given the council's strategic objective to increase biodiversity, new sites may be designated over the lifetime of the ALP.	ALPMods596
54	Pagham Parish Council (Miss Nicola Jones)	934572	The modification to this policy means it has greater scope and covers any land that has the features of the designated site, so is not restricted to only those immediately neighbouring a site.	ALPMods122
54	Mrs Kia Trainor	1099823	We will be looking at this issue further before the EiP “ particularly in relation to the recent high court judgement between Wealden District Council, Lewes District Council and the SDNPA (Case No: CO/3943/2016). We believe that the commitment within 17.1.27 should also be included within the Policy itself, with the suggestion of the removal of “unless otherwise in compliance with the Habitats Directive.'	ALPMods862
55	Mrs Alison Giacomelli	1099842	Natural England supports the modification to include reference to the requirement to make contributions to the strategic approach to access management at Pagham Harbour. This accords with the Habitats Regulations Assessment and is necessary to ensure that it can be concluded that housing allocations within 5km of Pagham Harbour will not have a likely significant effect through recreational disturbance.	ALPMods331

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
55	Mr Keith Meadmore	1099222	These revisions / modifications are not adequate or acceptable. Considers that the Plan needs to set out who the 'partners' are in this respect are. Goes on to state that what is required is for confirmation that NE and EA are included as partners and that they have reviewed and agree with the conclusions of the HRA Update 2017 that the combined proposed developments would have no adverse effect on the integrity of Pagham Harbour SPA Ramsar, nor upon any SSI or other protected area in close proximity to it. Further considers that the wording needs to be revised to include a specific requirement that applications will be reviewed by by Natural England to ensure the build work and mitigation measures left to the developers to instigate are satisfactorily completed. Developers cannot be trusted in this regard, and it would be inappropriate to place the burden of responsibility upon the ADC Building Inspector's department. So the involvement of NE throughout the development phases is critical to ensure absolutely the objectives and goals of the Local Plan are met and independently verified.	ALPMods162
55	Mr Ian Truin	670117	This action seems to have already been agreed with Chichester and sadly decreases 'perpetuity' to 80 years from 125. Such a short termist approach makes the sustainability of any aspect of the Plan questionable.	ALPMods714
55	Pagham Parish Council (Miss Nicola Jones)	934572	This has not been removed but will be delivered, by the partners responsible for Pagham Harbour, as part of an agreed strategic approach also including elements such as monitoring to be funded by the contributions resulting from the application of this policy.	ALPMods123
55	Barton Willmore	924110	We note that the policy text reads slightly differently within the text as set out within the ADC Main Modifications Summary Table with the inclusion of the word 'interim' this should be clarified. We consider that requesting Developer Contributions towards Strategic Access Management Measures (SAMM) at Pagham Harbour should be both proportionate and appropriate to the scale and impact of development proposed. Where on-site Strategic Access Management Measures are incorporated into a development, this should be taken into consideration accordingly.	ALPMods578
56	Pagham Parish Council (Miss Nicola Jones)	934572	Pagham Parish Council does not support this modification. The Maps do not take into account all the farmland recently leased to Pagham Harbour LNR or managed by them. Sites in land west of Pagham road are very probably now within the 400metre buffer zone and therefore should be left undeveloped.	ALPMods124

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
57	Mr Ed Miller	650122	Ferring Conservation Group strongly support the policy as now drafted. Habitats and biodiversity should be protected through Arun, not just in BOAs	ALPMods433
57	Pagham Parish Council (Miss Nicola Jones)	934572	Pagham Parish Council does not support the modification. We support policy ENV DM3- Biodiversity opportunity areas. "Development proposals that do not reasonably address opportunity for enhancing these - etc. shall not be permitted". In Pagham a number of adjoining fields have been taken out of the Greenfield designation. These are vital supporting habitat for rare birds, voles. These fields are also "wildlife corridors and stepping stones".	ALPMods125
57	Mr Raymond Radmall	1101559	Pagham's settlement is adjacent the Pagham Harbour Nature Reserve (covered by UK, EU, International laws and directives). Nearby fields, allocated for development, support a wide range of protected species (overspill from the Nature Reserve). Detailed survey work carried out by the Sussex Wildlife Trust & Sussex Biodiversity Record centre, specify that the disturbance of species, destruction of habitat/foraging and obstruction of flightlines, all will make the developments unsound and unsustainable. Many issues are stated as constituting "a criminal offence" under the Wildlife & Countryside Act.	ALPMods745
57	Sussex Wildlife Trust (Jess Price)	615795	Policy ENV DM3 " Whilst we support the recognition of Biodiversity Opportunity Areas, there are other non-designated areas of high biodiversity value in Arun District. We would like to see the requirements of this policy relate to all areas of the District, with perhaps a particular focus on BOAs within this.	ALPMods597

## CHAPTER 18 Water

This chapter covers all the issues relating to the water environments within the Arun District Local Planning Area. This is split into 5 parts covering the key issues relating to water; Supply and Quality; Flooding; Sustainable Drainage Systems and Coastal Protection.

### DESCRIPTION OF MAIN CHANGES TO SECTION

This has included a number of main and minor modifications throughout to clarify and reflect the changes to building standards, plus removing text that is duplicated in Chapter 22 Infrastructure provision & implementation.

### MAIN MODIFICATIONS IN SECTION

MM58 Policy W DM1Point 1 – Reflecting regulation change  
MM59 Policy W DM3 -Deletion of point k

Minor alterations are:  
MC257-279.

### NUMBER OF REPRESENTATIONS (Who from; Support / oppose; Statutory Consultees)

10 comments were made on this section. 3 Parish Councils commented, as well as 3 statutory consultees and 4 residents.

Bognor wished to understand the reason behind MM59 and Aldingbourne remain deeply concerned about flooding issues feeling the Local Plan does not give reassurance believing that the partnership mentioned (WSCC; Southern Water; ADC; EA and Local Groups) will effectively deliver a solution as WSCC needs teeth to deliver. Angmering Parish Council focus on surface water run-off related to the strategic site at Angmering North impacting on flooding downstream. Feel that further work is required for each site before numbers can be agreed.

The 3 statutory consultees who commented on this chapter are Southern Water, West Sussex County Council (WSCC) (as Lead Local Flood Authority) and CPRE Sussex. Southern Water had no comments to make on the main modifications. WSCC recommend a number of minor alterations, including an addition to W SP1 and the reinstatement of information contained in paragraph 18.3.6. CPRE Sussex consider that further information needs to be included for the funding and management of drainage and flooding infrastructure. They believe that full, specific drainage feasibility is required before a plan allocation is included.

One resident equally asks the question regarding the removal of paragraph 18.3.6, another considers that modifications need to be more extensive particularly feeling that cumulative impacts should be emphasised and another simply feels that building will make existing situations worse. Finally, the last considers that flooding is the greatest risk to Angmering village and could be entirely avoided through locating development where flooding from all sources is lowest. They go on to consider that the SA and Sequential and Exception tests seek to justify preconceived allocations rather than attempting to objectively locate them in the safest possible locations from all sources of flooding.

## SUGGESTED CHANGES

Further Minor Modifications listed in the order to which they occur in the document.

The most appropriate response to the comments on paragraph 18.3.6 is considered to be to delete the first two sentences and reinstate the rest of the paragraph as below:

~~“Inevitably, there are serious concerns about the impacts of flooding, both in respect of current properties at risk but also long-term management in the District. These issues are therefore key factors in determining the scale and location of development .~~ In considering new locations for development, and to minimise future risks, it is important that developers consult the latest Strategic Flood Risk Assessment (SFRA) which details the extent of the hydraulic modelling, existing flood defences and the extent of fluvial, tidal, historic incidents of sewer flooding and the speeds and depths associated with this, as well as areas prone to flooding in addition to the Environment Agency flood maps to ensure that development is avoided in areas at risk from flooding, or likely to be at risk as a result of climate change, or in areas where development is likely to increase flooding elsewhere.”

Remove ‘urban’ from paragraph 18.4.1 – “The primary purpose of Sustainable Urban Drainage Systems (SUDS)...”

Include the following at the end of point a. of W SP1 – “...surface water and improves water quality”

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
58	West Sussex County Council (Darryl Hemmings)	613347	WSSCC comments for wording improvements to this section, including the retention of paragraph 18.3.6	ALPMods822
58	Aldingbourne Parish Council	1100287	Expresses particular view relating to content of paragraph 18.2.7	ALPMods511
58	Southern Water (Charlotte Mayall)	1099881	Southern Water have no comments to make with regard to the proposed Modifications to the Arun Local Plan.	ALPMods339
58	Mr Keith Meadmore	1099222	There will undoubtedly be many developers acting in close proximity or a principal developer constructing in phases. This current wording suggests that each development, individually, is likely to be assessed in isolation. Consider that the wording should be further modified to leave no doubt that should be on combined basis.	ALPMods185
59	Mr Robert Bean	1099763	Bognor has already seen major flooding in the last 5 years. The proposed site off Chalcraft Lane has a very high water table. Surely building 2500 houses here will make the current situation worse	ALPMods202
59	CPRE (Mrs Kia Trainor)	1099823	Concerns about drainage and new development.	ALPMods861
59	Mr Geoffrey M Gibbs	616018	Considers flooding to be the greatest risk to Angmering and that the risk is entirely avoidable. Believes that this would be achieved through locating development where flood risk from all source is the lowest.	ALPMods825
59	Mr Colin Hamilton	1093041	In reference to para 18.3.6 WHY is this being deleted. It makes complete sense and it applies to the Pagham/Bersted strategic site. Please restore.	ALPMods40
59	Angmering Parish Council (Mr Rob Martin)	670839	There needs to be a clearer understanding of what the increased risk of flooding is from major development on each of the separate sites that make up this Strategic allocation; surface water drainage measures that may be required; impact on site lay-out as well as the cost implications, before housing numbers are agreed upon.	ALPMods681

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
59	Bognor Town Council (Sheila Hodgson)	1101605	These comments are reflective of the Bognor Regis Town Council Neighbourhood Plan and the Planning & Licensing Committees Note modification but seek reason for redaction	ALPMods768

## **SUMMARY SHEET**

### **CHAPTER 19 Natural Resources & Minerals Safeguarding**

This chapter covers the situation relating to minerals working in the District.

### **DESCRIPTION OF MAIN CHANGES TO SECTION**

The Main modification to this chapter was deletion of the first paragraph and replacement with paragraph and bullet points regarding treatment of applications in Minerals Consultation Area and a second paragraph about the use of recycled and secondary materials.

### **MAIN MODIFICATIONS IN SECTION**

MM60 Policy NR DM1 Reflecting latest policy status

### **NUMBER OF REPRESENTATIONS (Who from; Support / oppose; Statutory Consultees)**

Only one representation was received on this chapter from West Sussex County Council mentioning that the wording of the policy will need to be kept under review as the policies in the JMLP emerge.

### **SUGGESTED CHANGES**

No change at present – but updating prior to adoption with the latest status of the JMLP will be needed.

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
60	West Sussex County Council (Darryl Hemmings)	613347	WSSC as the Minerals and Waste Planning Authority note that - The wording of Policy NR DM1 will need to be kept under review as the policies in the JMLP are emerging draft policies and may be subject to change.	ALPMods821

## **SUMMARY SHEET**

<b>CHAPTER 21 QUALITY OF THE ENVIRONMENT</b>
Arun's Local Plan strategic objective for the Quality of the Environment is to: "Promote strong, well integrated and cohesive communities, through the promotion of healthy lifestyles, provision of good quality accessible community facilities and a safe environment, which delivers an enhanced quality of life to all. This includes meeting the needs of a growing elderly population."
<b>DESCRIPTION OF MAIN CHANGES TO SECTION</b>
<b>Policy QE DM2</b> Minor modification for context of South Downs.
<b>MAIN MODIFICATIONS IN SECTION</b>
<b>Policy QE DM2</b> a No adverse impact on neighbouring uses or the wider landscape, <u>particularly with regard to the South Downs International Dark Sky Reserve designation.</u>
<b>NUMBER OF REPRESENTATIONS (Who from; Support / oppose; Statutory Consultees)</b>
There were 5 representations from CPRE and residents.
<b>SUGGESTED CHANGES</b>
No suggested changes.

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
62	Mrs Vicky Hennessy	1101068	QE SP1. The cumulative effect of all the development, on the west side of Arun is likely to have a negative impact on the area.	ALPMods630
62	Mrs Anna Aston-Clarke	1096894	Suggest that complete protection of Grade 1, 2 and 3a farmland for agricultural purposes is also specified.	ALPMods112
62	Mr Robert Bean	1099763	The cars from an additional 2500 homes joining the traffic jam down Chalcraft Lane will make air pollution worse for people that live near Chalcraft Lane	ALPMods203
62	Mrs Kia Trainor	1099823	The NPPF para158 requires that 'each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. In 2015, Arun District Council completed an Air Quality Updating and Screening Assessment. It concluded that there are no areas likely to exceed the air quality objectives and therefore it was not necessary to designate any Air Quality Management Areas (AQMAs). Should this be revisited in light of the proposed new housing target?	ALPMods860
62	Mr Ian Francis	1099758	These plans are directly in contradiction of the objective. The use of the farmland reduces areas for these natural resources and a rich and diverse biodiversity. Sadly the stated objectives are neither understood or suitably protected by the plans for Clymping. A suitable Biodiversity Impact Analysis (BIA) is essential to prove ADC it's commitment to it's stated objectives. Without it these plans are non compliant to there own stated requirements.	ALPMods256

**CHAPTER 22 INFRASTRUCTURE PROVISION & IMPLEMENTATION**

Arun's Local Plan strategic objective for Infrastructure Provision and Implementation is to: "Deliver all Local Plan Strategic Objectives."

**DESCRIPTION OF MAIN CHANGES TO SECTION****Policy INF SP1**

It has also been noted through consideration of representation number PUB-INF SP1-535 that the policy wording under the final three bullet points differs from national policy (paragraph 204 of the NPPF and Regulation 122 of the CIL Regulations 2010) without a local justification. This point is valid and a further amendment to the wording of the policy is suggested.

**Policy INF SP2**

A new policy for a new secondary school due to an update to infrastructure requirements as a result of revised OAN.

**MAIN MODIFICATIONS IN SECTION****MM 63 – Amended Infrastructure Policy INF SP1**

**MM 64 Policy INF SP2 - New Policy for Secondary School and supporting text 22.021-22.025**

**NUMBER OF REPRESENTATIONS (Who from; Support / oppose; Statutory Consultees)**

There were 32 representations. These commented on changes to the supporting text and about the merits or practical issues to deliver a secondary school.

**SUGGESTED CHANGES**

Minor mods will be needed as per West Sussex County Council Broadband Team  
With respect to the area of search referred to in paragraph 22.0.24, WSCC consider that the area of search should be broadly defined by the Barnham/Westergate locality identified on the accompanying map which should be added to the draft Policies Map.

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
63	Sussex Wildlife Trust (Sussex Wildlife Trust (Jess Price))	1100900	22.04 " The Trust is disappointed to see the reference to Neighbourhood Plans removed.	ALPMods598
63	Angmering Parish Council (Mr Rob Martin)	670839	Add the existing infrastructure being delivered for part of the allocation that has a masterplan.	ALPMods687
63	Mrs Mary Cook	1099104	Arun District Council seems only to be concerned with Littlehampton and Bognor Regis not with any of the small villages in the area ie Pagham	ALPMods89
63	Mr Colin Hamilton	1093041	Comment on a minor modification to amend para 22.0.3 which deletes the reference to the process that large applications may undergo during preparation.	ALPMods41
63	Clymping Parish Council (Mrs Val Knight)	1094554	Concern about the IDP completeness and adding up. Also concern about the Transport evidence.	ALPMods533
63	Angmering Parish Council (Mr Rob Martin)	670839	Considers the viability assessment methodology flawed in principle.	ALPMods770
63	Angmering Parish Council (Mr Rob Martin)	670839	Delivery of Identified Infrastructure Arun Infrastructure Capacity Study & Delivery Plan (ICSDP) 2016.	ALPMods690
63	Mr Derrick Chester	613857	Health facilities once again only focus on primary care facilities. Leaving aside the increasing difficulty in recruiting GPs to staff these there is not any attempt to measure the effect on Hospitals. There should be as there must be impact on both Worthing and St Richards Hospitals.	ALPMods60
63	Mr Ian Francis	1099758	Infrastructure provision needs to be planned and delivered.	ALPMods187

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
63	Cliff/Cheryll Brown	1093662	Mr Bore we implore you to think of the lack of infrastructure in particular the road network capable of taking the additional traffic from two new developments of some 4,000 homes (Garden Cities) proposed in Barnham, Eastergate and Westergate and Pagham. All in one area, and the other building elsewhere in the District.	ALPMods34
63	Mrs Josie Jarvis	1099780	Opposed development due to lack of infrastructure.	ALPMods253
63	Mr Roger Kingswell	1097923	Recent study for Arun District Council of the Arun Local Plan, done by Hants council identifies serious problems with regard to the new housing proposed for west Bersted and Pagham. However, the grading at the end of the well written study is not consistent with the information in the study. Traffic congestion is really bad now (over 90 mins from Chichester to Bognor by car is not uncommon). The provision of health services is inadequate now, and the waste water treatment situation would not be able to cope, leading to serious pollution of Pagham harbour.	ALPMods338
63	West Sussex County Council Broadband Team (Mrs Jo Furber)	1093582	Comments on broadband text within the Plan and a need to update some of the information as it is now outdated.	ALPMods2
63	Southern Electric Power Distribution plc (Mr Terry Davies)	863253	General guidance on the provision of electricity infrastructure and the treatment of any existing infrastructure in relation to future development.	ALPMods3
63	Barton Willmore	924110	Support -The revision of the policy text in line with CIL 2010 123 Regulation is supported to ensure consistency with national policy.	ALPMods579
63	Climping Field Protection Group (Mr David Miranda)	1099747	The complexity of the costings in the infrastructure Delivery Plan. It was not possible to assess whether the sums add up or not i.e. if the required infrastructure can be delivered. The ATS wholly underestimates the impact of the proposed strategic developments and whilst it may address the deficiencies of some junctions it adds no new highways capacity to cope with journeys associated with 20,000 new homes, let alone the needs for business investment.	ALPMods176

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
63	Jackson Planning for Gleeson & Langmead PS	1100874	The joint promoters ostensibly SUPPORT the revision to the policy and would comment that in practice this policy appears sound as it is seeking to address unacceptable impacts but highlighting they must meet the statutory tests for planning obligations required by Regulation 122 of the Community Infrastructure Regulations 2010.	ALPMods585
63	Mr and Mrs Alan and Margaret Brackley	1102217	With regards to policy INF SP1 I note the complexity of the costings in the Infrastructure Delivery Plan. It was not possible to assess whether the sums add up or not and if the required infrastructure can be delivered.	ALPMods894
64	West Sussex County Council (Darryl Hemmings)	613347	WSSCC observe that the majority of the increase to the pupil population arises from the Strategic Development sites at BEW, Ford, Fontwell and Yapton. At this stage in the plan-making process, WSSCC has informed the District Council about the physical requirements for secondary school site and is working with the District Council, the site promoters and education providers to explore the locational options and will continue to do so with the aim of reaching a preferred option before examination hearings recommence, if possible.	ALPMods823
64	Mr gary smith	1098017	Comments that if a new secondary school is provided where will the teachers come from.	ALPMods22
64	Ms Kirsty Sandbrook	1097789	I do not support this. The plan says that a very large number of houses are planned in Bognor Regis and Pagham but there will be no extra school locally as it is planned to be built in the Barnham, Ford or Westergate area. This means there will be increased traffic congestion as the children will all travel by car. This will increase pollution, noise and journey times for everyone.	ALPMods351
64	Mrs Kia Trainor	1099823	Information about current levels of capacity at the District's schools shows that there is little capacity with existing schools at or near capacity or oversubscribed. There is not enough clarity about where the secondary school will go and how the road network will be impacted by increased school commuting until it is completed.	ALPMods858
64	Yvonne Hickmore	1099827	MM64 Lastly, the pressure on schools, particularly the senior schools, and the medical facilities will be too great to deal with. The hospital is already working to capacity. Therefore this proposed plan does not meet the needs of the area.	ALPMods291
64	Mr Ian Truin	670117	Policy INF SP2 requires that the Policy Maps show the location of search for a new secondary school. There are no references to the chapter and no visible areas marked on the maps.	ALPMods715

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
64	Mr Colin Hamilton	1093041	Secondary school comment- The LP states that a 6FE school is required and that it will be destined for Barnam, Eastergate, Westergate or Ford. With a large share of housing in Pagham and Bersted a large number of children will have to commute considerable distances thus adding to the traffic chaos.	ALPMods47
64	Mr Ian Truin	670117	Secondary school site needs to be agreed if it is needed by 2020/21	ALPMods710
64	Bew Landowner Consortium	873776	Supports policy but wants amended wording to provide flexibility regarding the secondary school provision.	ALPMods853
64	Mrs Gill Witt	1099372	The County Council have determined that a new secondary school is required in the central area which is capable expansion when necessary. This is planned to be built either at Barnham/Eastergate/Westergate or Ford, based on the ability of older children to travel further for education. However, Bersted/Pagham being hit with a large proportion of proposed future development, extra commuting schoolchildren (many parents do deliver their children to and from school rather than using buses) on local roads will affect further any journeys taken at the beginning/end of the school day.	ALPMods184
64	Bersted PC (Mrs Debbie Holcomber)	1098152	The planned provision of only one new secondary school in the centre of the Arun district when the majority of the new housing is proposed for the western area, seems to defeat other policies designed to limit the need to travel. Roads in the Bersted area are already at/over capacity during peak periods and this is before the 7000+ new homes are built in the vicinity and the new industrial park.	ALPMods357
64	Bognor Town Council (Sheila Hodgson)	1101605	These comments are reflective of the Bognor Regis Town Council Neighbourhood Plan and the Planning & Licensing Committees BRTC SUPPORT any infrastructure and implementation of secondary schools	ALPMods769
64	Jackson Planning for Gleeson & Langmead PS	1100874	Whilst the Joint promoters support the allocation of a new secondary school they cannot agree to the detail of the policy as to how it will ensure that all developments that generate a need will fund the new provision. Therefore the proposed modification to introduce a new secondary school within Arun District is not sound as its proposed delivery is not consistent with National Policy Objectives. This is because the policy does not comply with the CIL regulations on pooling of contributions.	ALPMods586

<b>MM No.</b>	<b>Full Name</b>	<b>Person ID</b>	<b>Officer Summary</b>	<b>Comment ID No.</b>
64	Barton Willmore (Mr Tom Rice)	1095196	Wholeheartedly supports principle of ensuring that the educational needs of the District are understood and planned for. Do not consider that the broad area of search referred to in this policy has been carried across to the published policy maps. As promoters of the proposed strategic allocation at Ford Airfield we confirm that we would be willing to explore the potential of accommodating a secondary school at Ford further. In this regard we offer a couple of suggestions to facilitate this process. See attached document for detail.	ALPMods582
64	mr giles binyon	1099244	With Bersted and Paghams/Aldwick designated to be taking a large share of the housing and the schools local to these parishes oversubscribed, why is the Secondary School site going to be located Barnham/Westergate or Ford?	ALPMods396

## Maps

<b>MM No.</b>	<b>Full Name</b>	<b>Person ID</b>	<b>Officer Summary</b>	<b>Comment ID No.</b>
66	Crayfern homes (Luken Beck)	1099497	The objection to this modification is the omission within the Main Modification 66 to include sites which have been identified and allocated through the Made Neighbourhood Plans. This representation refers specifically to land between junction of West Walberton Road / Arundell Road and land to the east of Woodacre and its designation in the main modifications as countryside	ALPMods493
70	Barton Willmore	924110	Support the inclusion of the additional Strategic Housing Allocations within the Policies Map which have been considered as suitable, available and deliverable sites for meeting the SHMA housing need over the duration of the Plan period and beyond.	ALPMods580
70	Jackson Planning for Gleeson & Langmead PS	1100874	We support the inclusion of the Yapton site SD7 on the new local plan policy map	ALPMods587

## **Sustainability Appraisal**

This document sets out the process that has been followed in terms of appraising the modifications in terms of their environment, economic and social impacts taking account of the further evidence that has been carried out through the suspension period. This includes the sites that have been considered, different capacities relating to each and the progression of these throughout the full process. The main points are contained within the Main Sustainability Appraisal of the Arun Local Plan Modifications (PELP28a) and reference across to more detailed matrices contained in the Appendices (PELP28c). The Non-Technical summary provides a shorter summary of the content of the main report (PELP28c)

## **DESCRIPTION OF MAIN CHANGES TO SECTION**

A new SA document was commissioned and created clearly setting out all the sites/locations that have been considered for inclusion in the Main Modifications.

It sets out the progression of sites including their rejection and alternative growth levels considered. It further investigates the potential of the locations to contribute towards unmet housing need in the Housing Market Areas. Finally it sets out the baseline and the situation without the Plan, appraises the sites individually, as well as overall figures intended to be delivered as set out in the Housing Implementation Strategy. It then appraises the policies and the whole plan, as well as the mitigatory actions within the plan.

## **MAIN MODIFICATIONS IN SECTION**

There was no specific Main Modification to the Local Plan but comments were collated as they related back to a MM.

Specific reference to evidence document Sustainability Appraisal (PELP28a-c)

## **NUMBER OF REPRESENTATIONS (Who from; Support / oppose; Statutory Consultees)**

22 comments have been submitted against the Sustainability Appraisal. 2 of these were from Angmering Parish Council and Littlehampton Town Council (LTC). 1 was received from a developer and the rest were from 8 residents.

LTC have questioned the conclusions relating to 4 SA Objectives from the 2014 detailed matrices for West Bank. These were health and wellbeing; social infrastructure; movement within and beyond Arun and Flood Risk. Angmering Parish Council consider that the document is flawed as it thinks that the cumulative impact added to the existing ???should be included, believing this would change scorings and that suggest another site around Angmering would score more highly.

The developer is supportive of the methodology used in the new SA. Goes on to say that although the process of selection is logical this is based around a requirement for 919dpa and that using the SA as a key piece of evidence shows that there will be a shortfall, questioning the deliverability of the 20,000 of the Plan. Further quotes from the IDP, talks about phasing and the wider unmet needs of the housing market, concluding that the SA, as in Mid Sussex and Horsham, should be assessing a higher quantum.

1 resident supported the revised SA. 7 other residents provided varying comments on the

revised SA, with 12 coming from Mr Bell and Mr Truin. The majority of the comments from other residents disagree with the scores of the SA relating to specific sites, generally concluding that the plan will have detrimental impacts and are against sustainability.

Of the 10 comments submitted by Mr Bell 5 relate to flood risk at BEW, H SP2 and the Bognor enterprise sites, plus 2 that are focused on the Sequential and Exception Test (PEPTP9). The two others relate to the baseline set out in Table 3.3 misunderstanding that this relates to the situation without a plan in place and one is a duplicate.

Of the two comments that Mr Truin submitted, one related to the length of the document considering that it had not complied with the Inspectors comment to be more simple and concise. The other goes through various paragraphs and states that they are incorrect as he would reach a different conclusion.

### **SUGGESTED CHANGES**

Minor Modification to paragraph 6.18 to state the following:

“...the countryside and ~~green belt~~ gaps between settlements, minor negative...”

Minor addendum to the SA evidence document - Correct Appendix 5 detailed matrices for BEW to quote the correct climate change figures against SA Objective Flood Risk (p178)

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
SA	Mr Ian Truin	670117	Comments about the SA	ALPMods717
SA	Mr Gordon Bell	873326	Comments made against every sentence of the SA conclusion and content of the conclusion in the Exception Test of PEPTP9 relating to the BEW site, as consider that there will not be significant benefits that outweigh the flood risk..	ALPMods301
SA	Mr and Mrs David and Jackie Ayling	1102061	Comments on Sustainability Appraisal related to Pagham	ALPMods852
SA	Mr Derrick Chester	613857	Comments on the Sustainability Appraisal, feeling that insufficient weight is given to agricultural land considering climate change and food security. Also does not understand why Ferring East site rejected while Climping and Littlehampton included.	ALPMods67
SA	Mr Gordon Bell	873326	Does not agree with the descriptions in second column of Table 3.3 and lists a number of parts as examples.	ALPMods322
SA	Mr Gordon Bell	873326	Has compared the content of the matrices in the 2014 SA and the new SA, particularly focusing on SA objective 9 relating to flooding for the BEW and Ford sites. Finally concluding that the LPA desire to utilise the sites has clearly influenced the outcome and that the outcomes are clearly at variance to the truth.	ALPMods292
SA	Mr Gordon Bell	873326	Has done a review of the baseline section to show how he believes that the document has errors and misinterpretations. Goes on to mention house price ratio, job density, out-commuting, the A29 (these last 2 are linked to air quality), flooding and wastewater treatment works.	ALPMods321
SA	Mr Edmund Camerer Cuss	673991	I wish to voice support for the Sustainability Appraisal of the Main Modifications, April 2017, PELP28a, para 4.4. first produced in February 2017, and variously referenced at Policies SD SP1; SD SP 1a (c); SD SP2; LAN DM1; C SP1; H SP2.	ALPMods278

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
SA	Mr Ralph Ansley	1099058	It is not a sustainable development as it involves extensive building on a finite and dwindling resource; ie. Grade 1 and 2 Agricultural Land and a functioning flood plain. We have been warned that our nations food production will need to double over the next twenty years and the he use of highly productive land for building will reduce the amount of home grown food. This will result in an increase the amount of imported food (should it be available) with adverse effects on global warming; ie. The directly the opposite of what the government is seeking to achieve,	ALPMods403
SA	Mr Colin Hamilton	1093041	Notwithstanding the efforts by ADC put into the sustainability appraisal, it is perfectly clear to the constituent of average intelligence that such huge strategic developments are completely unsustainable with regard to problems of transport, existing congestion, road communication to the A27 in the east of the area, habitat, known flooding risks, medical and dental provision, sewage pumping and disposal and schools, most of which are recognised and understood by local people far better than by ADC.	ALPMods50
SA	Mr John Gibson	1099775	Objects to this Local Plan as the change is not positively prepared. Despite the sustainability appraisal process it is evident that Strategic Sites chosen with the level of development proposed are not sustainable because of issues related to, for example, transport, traffic, habitat, schools, GPs, sewage, flooding which local people understand, have made significant representations about, but ADC does not and does not listen.	ALPMods239
SA	Mr Gordon Bell	873326	Providing personal view on content of commentary against SA Objective 9 in detailed matrices on Policy H SP2 in Appendix 10. This considers it is preposterous and interprets this as meaning that to achieve this it will require surface water discharge rates into watercourses to be below that of the original greenfield discharge rate. Finishes by referring to items in the LH column as 'Sustainability Appraisal Objectives'• - which they absolutely are NOT., concluding that this shows the misunderstanding and disregard to sustainability.	ALPMods287
SA	Mr Gordon Bell	873326	Quotes and comments on SA objective 9 about flood risk relating to employment concluding that consider it is a misrepresentation of the flood risk from the local plan	ALPMods311
SA	Mr Gordon Bell	873326	Quotes and comments on SA Objective 9 relating to flood risk from Appendix 10 for Policies H SP1 and H SP2, considering they misrepresent the plan's impact on sustainability	ALPMods309

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
SA	Mr Gordon Bell	873326	Quotes figures for climate change relating to the BEW site from the SA and PEPTP9, showing that they are different and as well as asking which is correct	ALPMods313
SA	Mr Gordon Bell	873326	Sequential and Exception Test Report comment. Quotes table 3 from document and considers that the 532.42 hectares of land in flood zone 1 should yield 19000 rather than the 147 mentioned. Therefore thinks that there would be no need for an exception test to be done and considers that this is a significant error and example of sloppy work.	ALPMods314
SA	Mr Colin Hamilton	1093041	Sustainability Appraisal - specific comments about the Pagham sites. In the absence of detailed, scientific data, it is undeniable that much of this report is entirely subjective. Had the task been given to a body opposed to development, a report critical of the plan could be easily produced. It is littered with words such as 'may', 'might', 'could', and 'likely to'.	ALPMods736
SA	Mr Ian Truin	670117	The Inspector considered at IDDED13 point 7, that "the SA process should be kept as simple and concise as possible". The revised SA seems to total 902 pages and is neither simple nor concise. There are untruths, contradictions and inconsistencies in it and there have been decisions taken during the process of its preparation that mean that the SA does not deliver sufficient insight to assert that the plan is 'the most appropriate strategy when considered against the reasonable alternatives'.	ALPMods716
SA	Littlehampton Town Council (Mr Peter Herbert)	869431	The revised Sustainability Appraisal is a significantly improved document from the previously submitted version and contains a considerable amount of additional information. Detailed comments about sections relating to Littlehampton.	ALPMods103
SA	Angmering Parish Council (Mr Rob Martin)	670839	The Sustainability Assessment for Angmering is flawed.	ALPMods679
SA	Mr Gordon Bell	873326	This is a slightly shorter replica of ALPMods292.	ALPMods297

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
SA	Persimmon Homes (Craig Hatton)	874715	We are generally supportive of the approach within stage B which includes re-appraisal of sites including revised site boundaries and reassessment of 10 potential sites as well as 2 additional sites. However, we are concerned by the final element of stage B which relates to the testing of housing provision against the growth scenario of 919 dwellings per annum (dpa). Then talks over technical points relating to this but further states that considers the housing requirement to have been underestimated and that further sites will be needed. Finishes with the fact that feel the SA should appraise a higher figure.	ALPMods495

**Other Comments that were Not Related to a Main Modification – 72 Comments**

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
Other	Mr Ian Truin	670117	Arun District Council has no track record for planning or delivering housing and infrastructure at the levels and rate included in the ALP, with no evidence of its capability to enforce the conditions and conformity of the built additions. This is particularly evident in Barnham where 3 adjacent new developments do not work/conform on drainage requirements in an area prone to flooding.	ALPMods718
Other	Climping Field Protection Group (Mr David Miranda)	1099747	As reported in local press many individuals have found using the portal to facilitate commenting on the local plan to be confusing and testing. CFPG has received correspondence from people who have abandoned their attempts and are concerned that itâ€™s complexity, by default minimises opportunities to express concerns and give comments. CFPG has in excess of 120 subscribed concerned local supporters.	ALPMods180
Other	Bersted PC (Mrs Debbie Holcomber)	1098152	Comment about the consultation	ALPMods133
Other	Mr and Mrs David and Jackie Ayling	1102061	Comment about the consultation	ALPMods850
Other	Mr and Mrs S and C Elson	1101361	Comment about the consultation	ALPMods700
Other	Mr John Gibson	1099775	Comment about the consultation	ALPMods240
Other	Mr Michael Skinner	1099354	Comment about the consultation	ALPMods461
Other	Mr R Collins	614851	Comment about the consultation	ALPMods896
Other	Mr Robert Bean	1099763	Comment about the consultation	ALPMods204

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
Other	Mrs Henrietta Kendall	1100158	Comment about the consultation	ALPMods468
Other	Mrs Jane Collins	1098918	Comment about the consultation	ALPMods84
Other	Mrs Jane Richardson	1099739	Comment about the consultation	ALPMods304
Other	Mrs Jean Chapman	616225	Comment about the consultation	ALPMods731
Other	Mrs linda Skinner	1098296	Comment about the consultation	ALPMods452
Other	Ms Lynette Gill	614471	Comment about the consultation	ALPMods475
Other	Terry Pepper	1100030	Comment about the consultation	ALPMods440
Other	Pamela Hickey	1098452	Comment on consultation	ALPMods899
Other	Mr Ian Truin	670117	Comment on the Duty to Cooperate. Believes that ADC should feedback to Government to remove the DTC	ALPMods721
Other	Mr Gordon Bell	873326	Comment on the Infrastructure Delivery Plan	ALPMods319
Other	Mr Ian Truin	670117	Comment on the process of the Main Modifications.	ALPMods689
Other	Mr Alan Allison	616933	Comments about flood risk but not related to MM	ALPMods284
Other	Mrs Margaret Brackley	1102187	Comments about the consultation and transport issues, Ford, A27, character, agriculture, retail and urban sprawl.	ALPMods881
Other	Mr Lake	1098823	Comments on policies relating to gaps, strategic approach, transport and flooding	ALPMods271
Other	Mr Ian Truin	670117	Comments on the IDP.	ALPMods720
Other	Mrs Alison Giacomelli	1099842	Comments on the minor modifications for this policy.	ALPMods329
Other	Mr Gordon	873326	Comments relating to the IDP and infrastructure costs more generally.	ALPMods315

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
	Bell			
Other	Mr Derek Chapman	1101547	Concerned about Councillors and decision making process.	ALPMods738
Other	Bersted PC (Mrs Debbie Holcomber)	1098152	Concerns over the consultation process and accessibility of information.	ALPMods610
Other	Mr Ian Truin	670117	Consultation and engagement. Since the suspension of the ALP ADC has not a) requested any input from residents into the burgeoning revised Plan or b) developed any visions, assessments or presentations of the future shape of the District and the consequences for everyday life here, for discussion and improvement. Thus, the Plan Development process since the suspension has not been subjected to full and open scrutiny by AD Councillors and the residents of the District who are aware of it know that the process and outcome are UNSOUND, NOT POSITIVELY PREPARED and not fit for purpose.	ALPMods719
Other	Ms Wendy Kapp	616017	Consultation itself is flawed, it has not been easily accessible for the general public, has been poorly advertised by ADC and Parish Councils have struggled to guide residents through the process. Poor referencing of the main modifications and Policy numbers have left many online respondents struggling.	ALPMods623
Other	Mrs Kia Trainor	1099823	CPRE consider that more information is needed about how the "policy burdens" associated with the strategic sites will affect viability. The Local Plan states that "The Councils viability evidence indicates that on the Strategic Sites there is a wide range around the viability and even within the sites themselves.	ALPMods855
Other	Mr Ian Truin	670117	Error in the Main Modifications and the need to re- consult.	ALPMods701
Other	Aldingbourne Parish Council	1100287	Flooding and Drainage -We remain deeply concerned and the LP does not give adequate reassurance.	ALPMods508
Other	Mr Alan Byrne	852419	Historic England has no comments on the proposed modifications	ALPMods515
Other	Jane E Weston	1101084	I find your website relating to the Local Plan extremely difficult to navigate and not at all user friendly. Is this really genuine consultation??	ALPMods640

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
Other	Sarah Freeman Smith	1101201	I understand that we can comment on amendments to the Local Plan but this has proved to be totally mind boggling so I hope that you will note my comments in this simple email. Such an important issue should be clearly understandable so as not to prevent or deter 'the public' from having their rightful say.	ALPMods665
Other	R Burfoot	1100637	I wish to object to the lack of effective publicity from Arun DC regarding the consultation itself and its importance. Given the limited time available left to comment, I include below some examples of the modifications to which I strongly object, on the basis that they are not justified or positively prepared.	ALPMods552
Other	Mr Michael Hampton	1099738	I write to express strongly an objection to the form of this Consultation. It is poorly advertised and much more poorly prepared in terms of being easily accessible and understandable to the general public	ALPMods492
Other	Mrs Mary Cook	1099104	In respect of the Pagham development this is not sustainable which is obvious when you consider the problems we face with regard to transport , traffic , public services habitat, environment , flooding, wildlife, and the insidious threat to our village way of life and the residents wellbeing.,both human and animal.	ALPMods90
Other	Pete Edgeler	1100014	Issues with the consultation process and considers the Local Plan to be unfit for purpose.	ALPMods405
Other	Mr Alan Brackley	1102147	Issues with the consultation process. A number of comments relating to the Ford EcoTown Select committee, as consider that things are the same.	ALPMods866
Other	Mr N Mundy	1101119	It is extremely long and uses terms that only specialists in the field of planning would understand. It also seems to have no consideration for the impact on the local area and appears to favour the developer rather than the local community.	ALPMods655
Other	Mr Gordon Bell	873326	Make a number of comments about various parts of the ICSDP document	ALPMods320
Other	Mr Darrell Latimer	1101111	Most people I talk to don't know about these Plans so it couldn't have been widely advertised.	ALPMods650
Other	Mrs Carol King	1101036	My complaint is with the speed and lack of communication this matter(?) has been thrust upon us given the scale of proposed development. The infrastructure is only just coping, mainly the sewerage and roads, which are already inadequate.	ALPMods624
Other	Mr Alan Allison	616933	Neighbourhood planning - comment about the process of developing these	ALPMods282

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
Other	Mr Brian Sullivan	871328	Objection to Local Plan	ALPMods634
Other	Littlehampton Town Council (Mr Peter Herbert)	869431	P28 Spatial Portrait 3.40 Identifies horticulture as a key employment sector but this is not reflected in the chapter on employment and enterprise (8.4.2 has been deleted) or in the development of horticultural land in Littlehampton.	ALPMods95
Other	Littlehampton Town Council (Mr Peter Herbert)	869431	P57 - Policy SD SP3 which lists the gaps between settlements remains. However, the gaps listed between Littlehampton and Middleton and Arundel to Littlehampton would appear to be impacted by proposals at LEGA, Clymping, and the gap between Littlehampton and Arundel needs property defining. There are no revisions to this policy to reflect these developments	ALPMods97
Other	Yvonne Hickmore	1099827	QESPI Secondly, the area designated for the new estate has a tendency to flood, - just ask about the cemetery in winter. With new housing, this potential flooding will be shifted further south to Westmeads. QESPI Thirdly, the Westmeads estate has already had sewerage flooding problems and more housing will cause this to increase. Therefore this proposed plan does not meet the needs of the area.	ALPMods290
Other	Mr Alan Allison	616933	Seeks consultation in future about modifications to the BUAB	ALPMods283
Other	Mr Derrick Chester	613857	Simply complaining about the public not being included either in briefings or any other way. Wants an evening session of the resumed hearings to occur to allow people to come and speak direct to the Inspector. We can add nothing further to the consultation statement on this and is up to the Inspector what he arranges in terms of sessions	ALPMods68
Other	Mr. Richard Ostler	870689	Specific comments about the design section with examples described for Craigwell House	ALPMods897
Other	Mr Darryl Hemmings	613347	Suggests addition to glossary of - Registered Park and Garden within the Glossary	ALPMods824

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
Other	Mr Ian Truin	670117	The conduct of this consultation has been characterised by a poor process implemented by ADC, that is dismissive of the residents of the Arun District and has actively sought to restrict representations from the Public and other consultees. The ADC approach, yet again, has to be over prescriptive, complicated and unengaging in order to further limit scrutiny of the ALP The 20 odd page listing of the major modifications is not consistent with the references referred to in its own Key Note: a number of other comments made but these are not relevant to the modifications.	ALPMods680
Other	E White	732466	The HIS outlines a stepped approach to delivery and the calculation of 5 year HLS. Wates consider that the Sedgefield approach should be adopted in the calculation as there has been persistent under-delivery, meaning that there is an obvious suppressed demand. The PPG is very clear on the need to adopt the Sedgefield method unless there is a robust justification for not doing so. ADC has not provided a robust reason for spreading the delivery of housing over the plan period. The fact that a 20% buffer has been included to make up for persistent under-provision would recommend against a stepped approach	ALPMods600
Other	Mrs Kia Trainor	1099823	The lack of detail as to exact development site boundaries or likely layout within sites is reflected in the relatively high level nature of the SA and assumptions relating to each objective. More narrative is needed to explain these assumptions.	ALPMods352
Other	Mrs Josie Jarvis	1099780	The objectives appear to ineffective as the proposed developments in areas where there is no employment or demand will not reduce the need to travel. Nor will it provide access to facilities. Meeting the needs of an ageing population means building the type of housing that they require...bungalows. Not all old people want or need to live in a care home. The plan for the Chichester A27 has now been scrapped...does the local plan take this into consideration or is the local plan already out of date as clearly the infrastructure is not in place.	ALPMods251
Other	Mr Colin Hamilton	1093041	The original LP detailed what developers might be expected to provide. Its removal denies the community facilities which the developer should be obliged to provide.	ALPMods49
Other	Mrs Diane Keen	1101153	The recent Transport Study which seems unrealistic in its conclusions on what "mitigation"™ measures (or highway improvements) would be necessary to deal satisfactorily with the almost sixteen thousand new homes proposed for Arun from now to 2031. The measures suggested are hopelessly inadequate.	ALPMods663

MM No.	Full Name	Person ID	Officer Summary	Comment ID No.
Other	Keith Langmead	1101090	The submitted Plan should have been withdrawn and then revised. These modifications are in effect a new plan which does not respond to the objections and representations made by many in respect of the submitted plan or the issues raised when the examination was suspended and raises new issues of concern as a result.	ALPMods644
Other	Mrs Gillian Yeates	676438	There has not been sufficient effective publicity from Arun District Council either about the consultation itself or its importance to local residents. Most people have only heard about it from Parish Councils who have had to step in to rectify the shortfall.	ALPMods496
Other	Mrs Lorraine Elder	1099792	Thinks the consultation was too short.	ALPMods261
Other	Mr C Self	614733	Tourism ; To allow more restaurants and cafes on the seafront, to maximise the sea views and attract more tourists (and money) to the area. To have something similar to the Big Wheel which was on Brighton Seafront, installed on Worthing seafront, again to attract visitors and money to the Town. To urgently revamp Teville Gate area, which is still an eyesore as you enter Worthing.	ALPMods7
Other	Mr Keith Meadmore	1099222	Wanting performance indicators	ALPMods327
Other	Mrs Hilary Paige	1099772	We need to protect the gap between settlements and retain their separate identity and if the development is permitted this will be compromised.	ALPMods354
Other		863456	We note the Built-up Area Boundary (BUAB) has been amended in locations, to acknowledge where development has commenced. However, we consider the BUAB should be further amended in respect of Angmering " specifically land at Broadlees, which should be included within the BUAB, in order to make the plan sound.	ALPMods414
Other	Mrs Hayley Bryant	1099964	We object to Arun Local Plan 2011-2031 Publication Version showing Modifications as published on your website in its entirety. The document is barely decipherable to the average resident of Arun District. It has hardly been shared widely with the residents of the district with one printed copy per library or Parish Office and seems designed to put off any regular person from attempting to understand its contents.	ALPMods613

<b>MM No.</b>	<b>Full Name</b>	<b>Person ID</b>	<b>Officer Summary</b>	<b>Comment ID No.</b>
Other	Mr Jackson	672557	Whilst the Council acknowledge that s106 contributions must comply with the CIL regulations in the modification to policy INF SP1, they are inadvertently impacting on viability of the strategic allocated sites as the approach is not effective and will not allow the proper sharing of costs across all housing developments, where a need is generated.	ALPMods590
Other	Mrs Josie Jarvis	1099780	With over 1300 houses proposed for Pagham/Rose Green where there is no employment will result in a substantial amount of commuting and therefore pollution. How is this conducive to tackling climate change?	ALPMods250
Other	Mr Brian Sullivan	871328	With regard to the Local Plan the consultation process is far too narrow, I am assuming at a later stage residents will have the opportunity to comment in far more detail.	ALPMods635