

ARUN DISTRICT COUNCIL

LOCAL PLAN SUB-COMMITTEE – 26 February 2018

UPDATE REPORT TO AGENDA ITEM NO. 6

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Subject : Consultation on Main Modifications of the Local Plan

Report by : Martyn White, Principal Planning Officer

Report date : 23 February 2018

EXECUTIVE SUMMARY

This report provides additional information to supplement agenda item number 6 of the Local Plan sub-Committee agenda (26 February 2018).

**1. BACKGROUND**

Item 6 of the Local Plan Sub-Committee Report, which is to be presented on Monday 26 February, provides Members with information related to the further Main Mods Consultation which concluded on Friday 23 February 2018 at 5pm.

Due to the timing of the consultation and the Committee report deadline, a report was prepared with the proviso that further information would be provided to Members. This report provides further information related to the representations submitted during the period of consultation.

As of the date that this report has been published (23/02/18), 65 individuals, organisations or groups have commented. From these there were 265 comments on the Main Modifications. An updated figure will be provided at the meeting if necessary.

All of the comments will be uploaded on to the Councils consultation portal, and made publically viewable after they have been reviewed. So far, representations have been submitted to Chapters 2, 3, 4, 6, 7, 8, 9, 10, 12, 13, 14, 15, 16, 17, 18 and 22 of the Local Plan.

The representations have been reviewed and a number of key themes or responses have been identified. They are summarised below according to the individual Arun Local Plan chapter. Some of the comments received do not relate specifically to the Main Modifications, however, they have been included in order to provide a more accurate picture of all of the representations received. These are included in a separate section of this update report.

The names of individuals are not made, but references to some organisations are (Please note that this is not exhaustive).

Please note that whilst a general summary is provided here, it is a representative example of all of the responses received as of Friday 23/02/2018. As a consequence, individual comments may not be included below.

The representations can be viewed in their entirety on the consultation portal. Representations are reviewed and made public by members of the Policy Team. The portal is available on the Council's Local Plan webpages.

## **Main Modification Comments**

### **Chapter 2 – Overview**

- Ferring Parish Council is supportive of the content of the modifications to the local plan. With a particular focus on open spaces, Ferring Parish Council is encouraged by the level of protection offered to the Strategic Gaps and the land north of the A259.
- Agreement with some of the modifications
- Dis-agreement with Development Plan documents as it would appear that Neighbourhood Plans have been ignored by ADC

### **Chapter 4 – Vision and Objectives**

- Reference should be made to 'high grade agricultural land' in Strategic Objective 5
- Amend paragraph 4.13 to make it clear that Littlehampton Harbour 'remains supportive of a mixed use vision for the harbour'

### **Chapter 6 – Sustainable Development**

- EA support the inclusion of bullet points (j) and (k) within policy SD SP1a
- New items j and k provide welcome protections.
- Reference to Neighbourhood Plans should be re-inserted into Policy SD SP1
- No support for the modification to Policy SD SP1a as it represents an unequal distribution of employment allocations, with a greater proportion of allocations in the west of the district. It is suggested that 5.3ha of employment land is restored in Angmering.
- Questions regarding the use of land west of Bersted allocation as opposed to that of previously developed land at Ford
- Policy SD SP1 - Simplification, removing references
- Wording of policy SD SP1a does not provide enough protection for coastal topography or adaptation due to climate change. Natural environment resources and biodiversity need a lot more protection

## **Chapter 7 – Settlement Structure and Green Infrastructure**

- Revised Policy SD SP3 retains the proposed new gap between Angmering and Worthing. It is not justified and should be deleted. Agriculture, horticulture and leisure activities should be listed in Policy SD SP3 as being permitted within the gaps.
- The insertion of criteria “f” into Policy SD SP3 weakens the policy. Remove the ability of a DPD to alter a gap set out in the Local Plan.
- The policies maps have not been updated to meet the criteria set out in paragraph 7.2.7 and 7.2.8 (subject to MM5). This should happen.
- Lack of support for amendments to paragraph 7.2.7 and 7.2.8
- The change in policy SD SP3 from "safeguarded for its own sake" to "land defined as countryside will be recognised for its intrinsic character and beauty" is unacceptable because it provides a much reduced protection.
- Development should be permitted in the countryside unless it is for quiet, informal recreations. The deletion of "quiet" opens to door to noise generating activities and that is unacceptable.
- The ability of a DPD to amend the boundary of the gaps is not supported
- The modification related to gaps between settlements is too restrictive
- The Felpham to Bognor Regis Gap is unjustified and should be deleted from Policy SD SP3 and Policies Map 3 amended accordingly.
- Object to deletion of final paragraph with its reference to gaps between settlements as important green infrastructure assets to be protected from inappropriate development and enhanced to provide high quality environment and multi-functional benefits.
- It is not clear why the views of Arundel, its castle, cathedral and its special setting have been given preferential treatment with respect to views as there are several other sites e.g. Pagham North development with views to Chichester cathedral which could be given special protection. It was understood that in planning terms no-one has a right to a view
- Any weakening of protection for the countryside is unwelcome and should be resisted.

## **Chapter 8 – Employment and Enterprise**

- The Skills Funding Agency support the modification to section 8.9 Employment and Skills
- Opposition to the reduction in employment land at Angmering as it is contrary to meeting a proportion of Worthing’s unmet employment land need. This reduction in employment area is considered to negatively affect existing businesses in Angmering and limit new business development
- The Littlehampton Harbour Board (LHB) is fully supportive of the effort to identify the infrastructure and environmental and development requirements to optimise the economic regeneration of the Harbour
- Littlehampton Harbour Board support the preparation of the Littlehampton Economic Growth Area SPD and also suggest additional wording to policy EMP SP2 first bullet point to state that “additional berthing should not be detrimental to the LHB’s duty to maintain an open port and safety of navigation for larger scale commercial traffic (vessels up to 79m in length).

## **Chapter 9 – Retail**

Amendment to the retail policy is agreed but regret the potential for less retail and a preponderance of financial and professional premises.

## **Chapter 10 Tourism**

The amendments are generally supported

## **Chapter 12 – Housing Delivery**

- Concern that MM24 allows for the Small Sites DPD to be prepared without the opportunity given to those areas which wish to review Neighbourhood Plans.
- Concerns raised regarding Neighbourhood Plans having to be reviewed to reflect the adopted Local Plan.
- Suggestion that the deleted criteria “b” in Policy H SP4 should be reinstated to prevent the “over concentration” of HMOs
- The final policy target set out in paragraph 12.1.5 is not sustainable or appropriate
- There should be no flexibility in the provision of 30% affordable housing for developers. Staff working in the essential service’s need to be able to find affordable homes.
- Concern about the impact that development at allocation SD9 (Angmering North) will have on the South Down National Park
- Concerns raised over housing numbers on West of Bersted site and infrastructure and service provision.
- Concerns were raised that not sufficient emphasis is placed on the need to ensure that strategic developments are planned to improve and enhance PRow and access networks within the new developments themselves for all Non-Motorised Users (NMUs)
- Last sentence of paragraph 12.1.15 should be more robust and better reflect the NPPF.
- Remove Church Barton House from Policy HSP2a provision b) as it is not justified as a non-designated heritage asset.
- Supports the need to find additional non-strategic sites through the preparation of new Neighbourhood Plans or revisions to existing Neighbourhood Plans to meet the very significant shortfall in the housing land supply in the Authority.
- The proposed modification to Policy H DM 1 Housing Mix goes some way towards addressing the significant need for older persons’ housing in the Authority.
- Agreement for some of the modifications

## **Chapter 13 – Design**

- Removing internal space standards and only specifying national standards as 'guidance' removed an important tool from the planning authority to safeguard against inappropriate accommodation.

- The minimum standard for external spaces must be reinstated
- The requirement that developers will be encouraged to make the most efficient use of land has been removed.
- The removal of measures in the Local Plan is unwelcome and unnecessary. Good design should be encouraged at all levels and minimum standards specified.
- Agreement for some of the modifications

#### **Chapter 14 – Health, Recreation and Leisure**

- The content of the amendments needs to be strengthened

#### **Chapter 16 – Conservation and Heritage**

- These changes are considered to have considerably weakened the protection afforded to heritage buildings and areas and as such are opposed.

#### **Chapter 17 – Natural Environment**

- Amendments to Policy ENV DM1 waters down the potential protection offered to nature sites. Also more emphasis should be given to rarity of species present
- ADC is playing lip service to many of the statements within the modified local plan.
- Agreement for some of the modifications

#### **Chapter 22 – infrastructure**

- Removing Ford as a specified location in policy INF SP2 risks delivery of the School all together,
- The location requirement of accessibility to public transport does not appear to have been added to the policy.
- Agreement for some of the modifications

#### **Non Main Modification Comments**

Some of the comments received during the consultation do not relate specifically to the Main Modifications. However, they have been included in order to provide a more accurate picture of all of the representations received. These are included in summary form below.

#### **Chapter 3 – Spatial Portrait**

- Comment regarding a factual inaccuracy regarding the description of Littlehampton Harbour.

## **Chapter 12 – Housing Delivery**

- EA – recommend setting out the site specific flood risk recommendations (criteria (d) and (q)) for West Bank (SD4) in more detail.
- EA – the EA support the inclusion of bullet point (e) within policy H SP2c that makes specific reference for a comprehensive strategy for surface water management, however, given the complexity of flood risk across this catchment we would wish that reference is made more widely to flood risk management in the policy criteria.
- Objection to Policy HSP2a SD1 and SD2 due to Brent Geese populations (and biodiversity issues) using land identified within the allocation; transport and infrastructure not sufficient

## **Chapter 15 – Transport**

- Comment regarding extending the coastal path to Littlehampton.

## **Chapter 17 – Natural Environment**

- Forestry Commission - The Forestry Commission state that are not in a position to input into the consultation process for Local Plans (Local Plans and ancient woodland).
- Currently the ADC proposal for Ford is 1,500 houses as opposed to the 5,000 considered as part of the Eco-Town. More development should take place on brownfield land first
- There is no provision made here for the developers to ensure adequate security for properties which back onto developments.

## **Chapter 18 - Water**

- The current proposed wording of policy W DM2 does not proactively address the danger of coastal, river and groundwater flooding.

## **Background Papers:**

Local Plan Sub-Committee Report, 26 February 2018. Item 6