

Committee Manager: Carrie O'Connor (Ext 37614)

4 December 2014

LOCAL PLAN SUBCOMMITTEE

A meeting of the Local Plan Subcommittee will be held in the **Council Chamber, Bognor Regis Town Hall, Clarence Road, Bognor Regis** on Thursday 18 December 2014 at **6.00 p.m.** and you are requested to attend.

Members: Councillors Haymes (Chairman), R Bower (Vice-Chairman), Bicknell, Brooks, Mrs Brown, Chapman, Charles, Mrs Goad, Mrs Hall, Mrs Maconachie, McIntyre, Nash and Oppler, (+ 1 Conservative vacancy).

A G E N D A

1. APOLOGIES FOR ABSENCE
2. DECLARATIONS OF INTEREST

Members and Officers are reminded to make any declaration of personal and/or prejudicial/pecuniary interests that they may have in relation to items on this agenda.

You should declare your interest by stating:

- a) the item you have the interest in
- b) whether it is a personal interest and the nature of the interest
- c) whether it is also a prejudicial/pecuniary interest
- d) if it is a prejudicial/pecuniary interest, whether you will be exercising your right to speak under the normal procedure rules applicable to the Committee

You then need to re-declare your prejudicial/pecuniary interest at the commencement of the item or when the interest becomes apparent.

3 MINUTES

To approve as a correct record the Minutes of the meeting held on 30 October 2014 (attached).

4 ITEMS NOT ON THE AGENDA WHICH THE CHAIRMAN OF THE MEETING IS OF THE OPINION SHOULD BE CONSIDERED AS A MATTER OF URGENCY BY REASON OF SPECIAL CIRCUMSTANCES

5 CONSULTATIONS FROM NEIGHBOURING AUTHORITIES AND NETWORK RAIL AND PROPOSED RESPONSES

There have been various consultations from neighbouring authorities and also Network Rail since the last meeting. Those relevant to this Sub-Committee are the Proposed Modifications to the Brighton and Hove City Plan; the Adur Proposed Submission Local Plan; Mid Sussex District Council's District Plan consultation draft and; Network Rails Draft London and South East Route: Sussex Area Route Study consultations.

This report contains brief summaries of the main contents of each and the proposed Officer response.

Note: *Indicates report is attached for all Members of the Subcommittee only and the press (excluding exempt items). Reports can be accessed through the Council's website at www.arun.gov.uk

Members are also reminded that if they have any detailed questions, would they please inform the Chairman and/or relevant Lead Officer in advance of the meeting.

Subject to approval at the next Subcommittee meeting

LOCAL PLAN SUBCOMMITTEE

30 October 2014 at 6.00 p.m.

Present : Councillors Haymes (Chairman), Bower (Vice-Chairman), Bicknell, Brooks, Mrs Brown, Charles, Mrs Hall and Mrs Maconachie.

14. Apologies for Absence

Apologies for absence had been received from Councillors Chapman, Cooper, Mrs Goad and Nash.

15. Declarations of Interest

The Monitoring Officer has advised Members of interim arrangements to follow when making declarations of interest. They have been advised that for the reasons explained below, they should make their declarations on the same basis as the former Code of Conduct using the descriptions of Personal and Prejudicial Interests.

Reasons

- The Council has adopted the government's example for a new local code of conduct, but new policies and procedures relating to the new local code are yet to be considered and adopted.
- Members have not yet been trained on the provisions of the new local code of conduct.
- The definition of Pecuniary Interests is narrower than the definition of Prejudicial Interests so, by declaring a matter as a Prejudicial Interest, that will cover the requirement to declare a Pecuniary Interest in the same matter.

There were no declarations of interest made.

16. Minutes

The Minutes of the meeting held on 31 July 2014 were approved by the Subcommittee and signed by the Chairman as a correct record.

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17. Arun Local Plan Update

Prior to consideration of the report and the accompanying background papers, the Principal Planner provided the Subcommittee with a verbal update on the current status of the Transport Studies. She advised that the Enterprise Bognor Regis Felpham link study had been completed and was available on the Council's website. The results had favoured Option 1, which would remain east of the railway line and so a bridge would not be required and would cost significantly less than the Option 2 route.

With regard to the Employment and Enterprise Validation Study the Principal Planner was able to advise that this was nearing completion and would be uploaded to the website in the near future.

The Chairman then sought the Subcommittee's approval to consider and vote on Parts A, B, C and D as separate entities, which was duly agreed.

Part A: An evidence base update which presented the Authorities Monitoring Report; Housing and Economic Land Availability Assessment; Housing Land Supply; and Housing Implementation Strategy.

- Authorities Monitoring Report –The Head of Planning Policy & Conservation advised that information was still awaited from the County Council regarding Commercial Delivery and from the Sussex Biodiversity Records Centre on the Sussex Biodiversity report.
- Housing & Economic Land Availability Assessment (HELAA) Sites,- The Head of Planning Policy & Conservation advised that this paper merged the Housing and Employment Sites Assessment into one resource, in line with best practice and planning policy guidance. The Subcommittee was also informed that, following the successful Yapton Neighbourhood Plan referendum, the density figures of two sites would be increased (Items 6 and 8 on page 44 of the agenda) and two would be deleted (items 7 and 9), with the net result being an uplift in numbers which would help with the Council's housing land supply. The changes would be made to the HEELA and related documents following Full Council on 5 November 2014.
- Housing Land Supply – The Head of Planning Policy & Conservation advised that this was a critically important aspect of the Authorities Monitoring Report and differed to that previously presented due to changes in planning policy guidance, with the key outcomes being detailed on page 57 of the agenda.
- Housing Implementation Strategy - The Head of Planning Policy & Conservation advised that the purpose of this paper was to show what contingencies had been made to underpin the Local Plan should any sites not come forward or come forward less quickly in the future.

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Part B: Assessments to support the soundness of the Local Plan, namely the Equalities Impact Assessment and an assessment required under Section 17 of the Crime & Disorder Act.

- Equality Impact Assessment - As the Council had adopted an Equality Impact Assessment procedure, it was considered that every policy in the Local Plan should be assessed. Most policies were scored neutrally, with the housing score being positive in policy areas such as affordable housing but with a negative score for Travellers until the Traveller Site Specific Development Plan was adopted.
- Section 17 of the Crime & Disorder Act – The Head of Planning Policy & Conservation advised that the policies in the Local Plan had been assessed against crime and disorder issues. The Safer Arun Partnership had worked with the Council throughout the development of the plan and had formally endorsed this assessment on 1 September 2014.

Part C: Draft Duty to Cooperate Statement; and Duty to Cooperate Correspondence.

Draft Duty to Cooperate Statement – The Senior Environmental Assessment Officer presented this paper and stated that, as part of the Localism Act, the authority needed to produce a Statement about how it would meet the requirement for the Duty to Cooperate. It was further stated that what was on the table was very much in draft form and it would be brought up to date prior to the Examination in Public. Members were requested to feed back their comments to Charlotte Hardy, the Senior Environmental Assessment Officer.

Members participated in some debate on this matter, particularly around attracting people from the wider area back into Arun and cutting down on travel to outside of the District by providing high quality jobs and regenerating areas within Arun. There was also some debate over issues relating to housing, incorporating the acknowledgement that the ‘Duty’ was a complex matter which did not recognise administrative boundaries.

Duty to Cooperate Correspondence – Part A – Memorandum of Understanding between Arun District Council and Mid Sussex District Council. The Head of Planning Policy & Conservation advised that the relevant Portfolio Holders had met and agreed the MoU in principal. The Council was not committed to anything in signing the MoU but it was equally beneficial for Arun and Mid Sussex to formalise their collaboration.

Part B – Officer response to Crawley Borough Council’s Duty to Cooperate letter. The Head of Planning Policy & Conservation

Subject to approval at the next Subcommittee meeting

advised that a response was necessary to Crawley's request for help with their employment and housing needs.

Part C – Statement of Common Ground with Lewes – officers were of the view that it would be beneficial for the Council to sign up to this and agreed with the evidence that was being put forward.

Part D: Response to Crawley Submission Local Plan and Planning & Traveller Consultation.

- Response to Crawley Submission Local Plan – The Head of Planning Policy & Conservation stated that it was considered that the approach being taken by Crawley Borough Council was a sensible one.
- Planning & Traveller Consultation – The Principal Planner introduced the consultation by saying that on 14 September 2014 the Government had published proposed changes to the national planning policy for Traveller Sites. She explained that the consultation particularly focussed on the following themes:-
 - Promoting fairness in the planning system – the consultation aims to achieve this by amending the definition of ‘gypsies and travellers’ and ‘travelling showpeople’ by removing “or permanently” from the sentence “Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily or permanently.....”
 - Protecting sensitive areas and the Green Belt – the consultation aims to achieve this by providing additional protection to sensitive areas including Green Belt and National Parks
 - Addressing the Unauthorised Occupation of Land – the consultation aims to achieve this by requiring that unauthorised occupation of land is used as a material consideration against an applicant when they make an application
 - Finally, the consultation requests comments on the Draft Planning Guidance for Travellers, to be included in the Planning Practice Guidance

It was reported that the draft officer response had been prepared in consultation with the Development Control Team Leaders for the Eastern and Western Areas as they had experience in dealing with Gypsy and Traveller applications and had an understanding of the sites in the District.

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The Principal Planner directed Members to the draft response to Question 1 with regard to the proposed amendment to the definition of Travellers. She highlighted that the proposed amendment could add unnecessary complexity to the planning process; could lead to delays to the decision making process; and could result in an increase in enforcement cases. Furthermore, the definition could lead to increased uncertainty for traveller families who intended to continue to travel but their circumstances, such as integrating children into local schools, prevented them from travelling.

The Subcommittee was requested to consider the officer's draft consultation response and, in the course of discussion, Member comment was made regarding Section 2 within Annex A – Draft Planning Guidance for Travellers” which stated that “Local Authorities should take account of travellers specific accommodation needs which related to their preference for mixed use caravan sites” and it was agreed that, as this term was not clear that would be noted in the consultation response. It was also agreed that Question 1 relating to the deletion of the words “or permanently” from the planning definition of travellers, should be left unanswered as it was not clear what the implications would be either with or without it.

The Subcommittee then

RECOMMEND TO FULL COUNCIL – That

PART A

(1)

- (a) Authorities Monitoring Report be agreed
- (b) the updated sites within the Housing and Employment Land Availability Assessment be agreed and that the most up to date HELAA database is made available on the website
- (c) the 2014-2019 Housing Land Supply Assessment be adopted;
- (d) the Housing Implementation Strategy be agreed; and
- (e) the evidence base updates provided for the Transport Studies and Employment and Enterprise Validation Study be noted;

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PART B

(2) the Equalities Impact Assessment and the Section 17 Crime & Disorder report be agreed;

PART C

(3)

(a) the progress made on the draft Duty to Cooperate Statement being prepared to support the Local Plan be noted:

(b) the Duty to Cooperate Memorandum of Understanding with Mid Sussex District Council be agreed

(c) the position set out in the officer's response to Crawley Borough Council's Duty to Cooperate letter be agreed;

(d) the Lewes District Council Statement of Common Ground be agreed;

PART D

(4)

(a) the officer response to Crawley Borough Council's statutory submission consultation (1 September – 13 October 2014), together with any minor changes to be agreed by the Portfolio Holder for Planning & Infrastructure and the Assistant Director of Planning & Economic Regeneration, be agreed;

(b) the officer response to the Government's proposed amendments to "Planning Policy for Traveller Sites" (March 2012), subject to Question 1 being left unanswered, together with any minor changes to be agreed by the Portfolio Holder for Planning & Infrastructure and the Assistant Director of Planning & Economic Regeneration, be agreed;

(5) any minor changes to documents in Parts A, B, C and D be delegated to the Portfolio Holder for Planning & Infrastructure and the Assistant Director of Planning & Economic Regeneration.

+(The meeting concluded at 7.00 pm)

AGENDA ITEM NO _____.

ARUN DISTRICT COUNCIL

LOCAL PLAN SUB-COMMITTEE – 18 December 2014

Subject: Consultations from neighbouring authorities and Network Rail and proposed responses

Report by : Simon Meecham – Head of Planning Policy and Conservation

Report date : 01 December 2014

EXECUTIVE SUMMARY

There have been various consultations from neighbouring authorities and also Network Rail since the last meeting.

Those relevant to this Sub-Committee are the Proposed Modifications to the Brighton and Hove City Plan; the Adur Proposed Submission Local Plan; Mid Sussex District Council's District Plan consultation draft and; Network Rails Draft London and South East Route: Sussex Area Route Study consultations.

This report contains brief summaries of the main contents of each and the proposed Officer response.

RECOMMENDATION

The following actions are recommended:

- That the Local Plan Sub-Committee recommends to Full Council that the officer responses to various consultations set out in this report are agreed. Any minor changes to be agreed by the Portfolio Holder and Assistant Director Planning and Economic Regeneration.

1.0 BACKGROUND

- 1.1 The Council is consulted as a statutory consultee on the various stages of the production of Local Plan's being prepared by both immediate neighbouring authorities and within the wider area. Since the last committee meeting there have been a further

three consultations that the Council have been invited to respond to.

- 1.2 The Council has also been invited by West Sussex County Council to respond to Network Rails consultation on the draft London and South East Route: Sussex Area Route Study.

2.0 CONSULTATIONS

- 2.1 Therefore the Council has been invited to respond to 4 consultations. Namely:

- Proposed Changes to the City Plan (Brighton and Hove City Council)
- Proposed Submission Adur Local Plan (Adur District Council)
- Consultation Draft District Plan (Mid Sussex District Council)
- Network Rails draft London and South East Route: Sussex Area Route Study

Proposed Changes to the City Plan (Brighton and Hove City Council)

- 2.2 This consultation runs for 7 weeks from 4th November until 16th December 2014. This proposes a number of changes to the City Plan, to be termed 'Proposed Modifications'. These have resulted from further work that has been carried out responding to concerns that the Inspector had raised. The main areas these changes focus on are:
1. The City's Housing target;
 2. Identification of the urban fringe as a broad source of potential for housing;
 3. The Brighton Marina policy; and
 4. The Sustainable Building policy.
- 2.3 Brighton and Hove has been a partner in the production of a number of joint pieces of evidence relating to the Housing Market. The studies take into account the constraints the City has and recognise that due to these constraints, the figure within the submitted plan of 11,300 did not meet the objectively-assessed development need of between 800-1000 homes per year. This figure was based on the 2012 SHLAA Update.
- 2.4 A review of the urban fringe sites was carried out which has considered capacities. As a result of this exercise an additional capacity of 1,900 units has been found to contribute towards the delivery of housing. Overall, it is now intended that 13,200 new homes will be delivered by 2030. It must be recognized however that this remains approximately 5000 units below the lower target for Brighton and Hove's objectively assessed needs.
- 2.5 66 sites have been considered for additional housing. 5 were excluded on the basis that they were covered by absolute constraints and site

visits were then carried out on the remaining 61 sites. The sites were reviewed in terms of their appropriateness for housing, what densities may be achieved and what mitigation may be required. As a result 39 sites were identified as having potential to accommodate housing. These correlated to the west, north and south of the City, with few in the east due to the greater number of constraints.

- 2.6 The standards within the Sustainable Buildings policy and parts of its supporting text have also been modified, as a reflection of the changed national position. This also clarifies that any further changes will be incorporated into Part 2 of the City Plan. Other more minor alterations throughout the document are included to reflect these changes.
- 2.7 The proposed response is attached as Background Paper 1.

Proposed Submission Adur Local Plan (Adur District Council)

- 2.9 This consultation is on the Proposed Submission Adur Local Plan and is for a period of 6 weeks from 20th October to 1st December. This forms the Regulation 19 stage which is carried out on behalf of the Planning Inspectorate, before being submitted for Examination in Public.
- 2.10 Changes to the Local Plan include a review of the gaps and built up areas where there has been some limited alteration to some of these. There has been a minor increase in the housing numbers, although this remains below the objectively assessed needs. The Local Plan and the supporting documents make clear what the constraints and deliverability issues are, as well as the joint working that has been carried out to deal with and address this expected shortfall against the objectively assessed needs.
- 2.11 The proposed response is attached as Background Paper 2.

Consultation Draft District Plan (Mid Sussex District Council)

- 2.12 This consultation is with respect to a Draft District Plan, containing all of those areas where Mid Sussex District considers no issues remain. This is an 8 week consultation that runs from 21st November until 16th January 2015.
- 2.13 The main aim of this consultation is to provide residents and stakeholders with the opportunity to comment on updated wording for the text and policies that it contains, as some have been significant since the last round of consultation. These have resulted from responses and discussions with professional and statutory bodies.
- 2.14 This consultation does not include any housing numbers, although it does allocate land for development at Burgess Hill. The housing

number will be set once all of the technical work on need and capacity has been undertaken and discussions with neighbouring authorities are concluded. There will be a chance to comment on these elements of the Plan when formally published in May 2015.

2.15 The proposed response is attached as Background Paper 3

Draft London and South East Route: Sussex Area Route Study (Network Rail)

- 2.16 Network Rail is currently consulting on the draft London and South East Route: Sussex Area Route Study. The consultation is running for 90 days and will close on 13th January 2015.
- 2.17 The study sets out a strategy for the Sussex area which forms part of the devolved South East route and covers the Brighton Main Line and connecting routes. The study will set the strategic direction for future investment in the Sussex Area Route rail network.
- 2.18 West Sussex County Council are considering the key issues for West Sussex to highlight in its response to Network Rail and has asked for the views of the local authorities in West Sussex and also other organisations such as rail user and community organisations to help inform its response.
- 2.19 The Council has provided an officer response to WSCC which is based on the matters emanating from the Leisure, Tourism and Infrastructure Working Group held earlier this year. This response is attached as part 1) of Background Paper 4.
- 2.20 The Council would also like to respond to Network Rail directly with some more detailed comments from Members who were asked for their views to inform this response. This proposed response is attached as part 2) of Background Paper 4.

Contact: Simon Meecham ext. 37698 simon.meecham@arun.gov.uk

**For Official Use:**

Respondent Number:

Rep No:

Date Received:

**Brighton & Hove City Council
Proposed Modifications to the Submitted City Plan Part One
Electronic Response Form**

Consultation Period: Tuesday 4th November until midnight on Tuesday 16th December 2014

The City Council is publishing for consultation post Submission proposed modifications to the City Plan Part One.

The City Plan Part One was submitted to Government in July 2013 and is currently under examination by an independent Planning Inspector appointed by the Government to consider the 'soundness' of the Plan. The Inspector held a series of hearing sessions in October 2013. In response to the Inspector's Initial Conclusions Letter the City Council is now proposing a number of changes or 'main modifications' to the submitted City Plan Part One to address her concerns.

We are only able to accept representations on these proposed modifications. Further guidance on completing this form can be downloaded at www.brighton-hove.gov.uk/planning/local-development-framework/consultation

This form has two parts: Part A – Personal Details
 Part B – Your Representation(s).

Representations should only relate to the Proposed Modifications and not other parts of the City Plan.

Part A: Personal Contact Details

Please note that you must complete Part A as anonymous forms or those that do not contain an address cannot be accepted.

	1. Your Details	2. Agent Details (if applicable)
Title		
Forename		
Surname		
Job Title		
Organisation	Arun District Council	
Address	Civic Centre	
	1 Maltravers Road	
	Littlehampton	
Postcode	BN17 5LF	
Email Address	localplan@arun.gov.uk	
Telephone No.		
Mobile No.		

Data Protection Notice: Personal data given on this form will be used by BHCC (and its agents) in connection with statutory functions. It will not be used for any other purpose.

Part B: Your Representation

Please answer the questions below and clearly explain your comments in the relevant sections. Use one form per representation / comment. You may use as many additional sheets as necessary.

(Please note that the text boxes below expand as you type)

Q1a. To which Proposed Modification does your comment relate? (Please enter one modification number)

Modification Number

Q1b. To which policy / section of the plan does your comment relate?

Policy / Section Spatial Strategy

Q2. Do you wish to support or object to this Proposed Modification? (Please tick one box)

Support
Object

Q3a. Do you consider this Proposed Modification Legally Compliant? (Please tick one box)

Yes
No

Q3b. Please use this space to explain your answer above. (Please be as precise as possible and refer to any supporting / background document as you see necessary).

Through the joint evidence studies that have been produced for the Coastal West Sussex and Greater Brighton it is known that there has been an increase to the objectively assessed needs of the City and as such we are supportive of the review of the urban fringe sites.

Q3c. Please set out what change(s) you consider necessary to make the Proposed Modification legally compliant and give your reasons. It will be helpful if you are able to put forward your suggested revised wording of the proposed modifications. (Please be as precise as possible).

Q4a. Do you consider this Proposed Modification is Sound? (Please tick one box)

Yes No

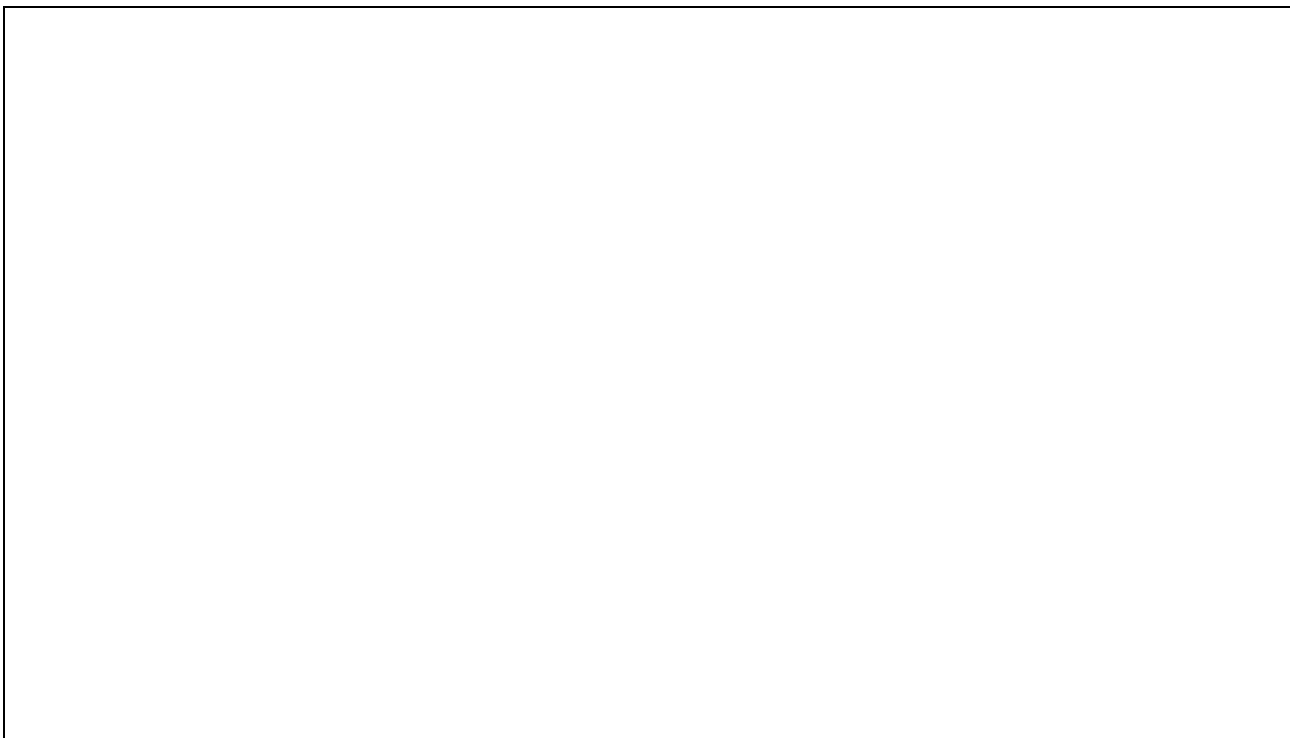
Q4b. If you consider that the proposed modification is unsound, please identify which test of soundness your representation relates to by placing a cross by the appropriate box.

Please select	Test of Soundness
<input type="checkbox"/>	It is <u>not positively prepared</u> in that it is not prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
<input type="checkbox"/>	It is <u>not justified</u> in that it is not the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence.
<input type="checkbox"/>	It is <u>not effective</u> in that it is not deliverable over its period and based on effective joint working on cross boundary strategic priorities.
<input type="checkbox"/>	It is not <u>consistent with national policy</u> .

Q4c. Please use this space to explain your answer to Q4a above (Please be as precise as possible).



Q4d. If you consider the Proposed Modification unsound, please set out what change(s) you consider necessary to make it sound and give your reasons. It will be helpful if you are able to put forward your suggested revised wording of the Proposed Modification. Please be as precise as possible.



Q5. The Sustainability Appraisal has been updated where appropriate to reflect the proposed modifications. Do you have any comments on this document?

Q6. Do you have any further comments to make?

Q6a. The Inspectorate's Procedural Guidance states that issues raised on consultation of the Proposed Modifications will be considered through written representations and further hearing sessions will only be scheduled exceptionally. Please could you indicate whether you would like to submit...?

i) Written Representations

Or if required by the Inspector, to

ii) Participate at the Examination in Public

Q6b. If you wish to participate at the Examination hearing, please outline why you consider this to be necessary:

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Q7. Please tick this box if you DO NOT wish to be notified of the publication of the Inspector's Report, adoption of the City Plan Part One or be involved in the preparation of future plans and policies.

<input type="checkbox"/>

Signed:	
Dated:	

All representations must be received at the email or postal address given on this form by **midnight on Tuesday 16th December 2014.**

Completed forms should be sent to:

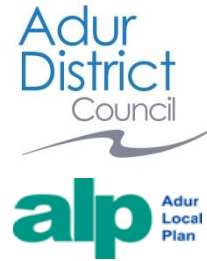
Email: ldf@brighton-hove.gov.uk

Post: LDF Team, Brighton & Hove City Council, Room 201, Kings House, Grand Avenue Hove, BN3 2LS

If you have any further queries please contact us on 01273 292505 or via email ldf@brighton-hove.gov.uk .

Thank you for taking the time to complete your representation(s).

Proposed Submission Adur Local Plan 2014



Representation Form

Return Address:

planning.policy@adur-worthing.gov.uk

Or:

Planning Policy Team, Adur and Worthing Councils, Town Hall, Chapel Road,
Worthing, BN11 1BR

Or hand in at:

- Adur Civic Centre, Ham Road, Shoreham-by-Sea, BN43 6PR or
- Portland House, 44 Richmond Road, Worthing, BN11 1HS

**Please return to Adur District Council by 5pm on 1st December 2014
Late representations will not be considered.**

Use of your information Respondent details and representations will be forwarded to the Secretary of State for consideration when the Adur Local Plan is submitted for examination. All documents will be held by Adur District Council and representations will be published including on the internet e.g. www.adur-worthing.gov.uk. Personal contact details (address, email and phone number) will be removed from published copies of representations. Your information will be handled in accordance with Data Protection Act 1998.

Contact details will be added to the Adur Planning Policy consultees database to keep you informed on the progress of the Adur Local Plan and other related documents.

Please tick if you do **not** want to be informed.

This form has two parts:

- i. Part A - Respondent Details. You only need to fill this in once.
- ii. Part B - Your representation(s). Please fill in a separate sheet for each representation you make.

It is recommended that you read the Guidance Notes provided for an explanation of terms used in this form.

Part A – Personal Information
You only need to complete this section once

Personal Details

First name	<input type="text"/>	
Last name	<input type="text"/>	
Organisation (where applicable)	Arun District Council	
Address line 1	1 Maltravers Road	
Address line 2	Littlehampton	
Address line 3	<input type="text"/>	
Post Code	BN17 5LF	Telephone <input type="text"/>
Email address	localplan@arun.gov.uk	

Agent's Details (if applicable)

First name	<input type="text"/>	
Last name	<input type="text"/>	
Organisation	<input type="text"/>	
Job Title	<input type="text"/>	
Address line 1	<input type="text"/>	
Address line 2	<input type="text"/>	
Address line 3	<input type="text"/>	
Post Code	<input type="text"/>	Telephone <input type="text"/>
Email address	<input type="text"/>	

Part B – Representation

Please use separate sheets for each representation

1. Which part of the Adur Local Plan does this representation relate to?

Policy No.	<input type="text" value="Policy 33"/>	Paragraph No.	<input type="text"/>
Map	<input type="text"/>	Other section (please specify)	<input type="text"/>

2. Do you consider the Adur Local Plan to be: (tick as appropriate)

- 2.1 Legally Compliant Yes No
- 2.2 Sound Yes No

Please read the Guidance Note for guidance on legal compliance and soundness.

If you have ticked no to 2.1, please continue to Q4.

If you have ticked no to 2.2, please continue to Q3.

If you have ticked yes to 2.1 and 2.2 please go to Q7.

**3. Do you consider the Adur Local Plan to be unsound because it is not:
(tick as appropriate)**

- 3.1 Positively Prepared
- 3.2 Justified
- 3.3 Effective
- 3.4 Consistent with National Policy

4. If you consider the Adur Local Plan to be unsound or not legally compliant, please explain why in the box below:

At the end of the first paragraph the policy states that “Where not possible or necessary to provide open space on site, contributions will be required to provide or improve open space off-site.” It is not clear from this as to which system this is intended to be done through, CIL or S106.

(Continue on a separate sheet if necessary)

5. Please explain in the box below what change(s) you consider necessary to make the Adur Local Plan legally compliant and sound having regard to the reason you identified above.

(You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested or revised wording of any policy or supporting text. Please be as precise as possible).

Clarification over the system for collecting contributions would be helpful to ensure the policy is robust.

(Continue on separate sheet if necessary)

6. If your representation concerns soundness or legal compliance and is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination? (tick as appropriate)

No, I wish to communicate through written representations

Yes, I wish to speak to the Inspector at the hearing sessions

Please note: The Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the hearing part of the examination.

7. If you wish to participate at the hearing part of the examination, please outline why you consider this to be necessary.

Part B – Representation

Please use separate sheets for each representation

1. Which part of the Adur Local Plan does this representation relate to?

Policy No.	<input type="text" value="Policy 5"/>	Paragraph No.	<input type="text"/>
Map	<input type="text"/>	Other section (please specify)	<input type="text"/>

2. Do you consider the Adur Local Plan to be: (tick as appropriate)

- 2.1 Legally Compliant Yes No
- 2.2 Sound Yes No

Please read the Guidance Note for guidance on legal compliance and soundness.

**If you have ticked no to 2.1, please continue to Q4.
If you have ticked no to 2.2, please continue to Q3.
If you have ticked yes to 2.1 and 2.2 please go to Q7.**

**3. Do you consider the Adur Local Plan to be unsound because it is not:
(tick as appropriate)**

- 3.1 Positively Prepared
- 3.2 Justified
- 3.3 Effective
- 3.4 Consistent with National Policy

4. If you consider the Adur Local Plan to be unsound or not legally compliant, please explain why in the box below:

The end of the policy refers to “all elements” being delivered through S106 or planning conditions, but it is unclear whether this is actually intended to relate to all elements outlined within the policy or is related to the phasing of development. As written this causes confusion and potentially repeats other parts within the same policy that also refer to CIL and S106.

(Continue on a separate sheet if necessary)

5. Please explain in the box below what change(s) you consider necessary to make the Adur Local Plan legally compliant and sound having regard to the reason you identified above.

(You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested or revised wording of any policy or supporting text. Please be as precise as possible).

It is suggested that either a minor addition to add clarity, or the removal of the earlier mention to CIL/S106 could ensure the policy is robust.

(Continue on separate sheet if necessary)

6. If your representation concerns soundness or legal compliance and is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination? (tick as appropriate)

No, I wish to communicate through written representations

Yes, I wish to speak to the Inspector at the hearing sessions

Please note: The Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the hearing part of the examination.

7. If you wish to participate at the hearing part of the examination, please outline why you consider this to be necessary.

Part B – Representation

Please use separate sheets for each representation

1. Which part of the Adur Local Plan does this representation relate to?

Policy No.

Paragraph No.

Duty to Cooperate
Statement – Para 3.22

Map

Other section
(please specify)
2. Do you consider the Adur Local Plan to be: (tick as appropriate)

2.1 Legally Compliant Yes No

2.2 Sound Yes No

Please read the Guidance Note for guidance on legal compliance and soundness.

If you have ticked no to 2.1, please continue to Q4.

If you have ticked no to 2.2, please continue to Q3.

If you have ticked yes to 2.1 and 2.2 please go to Q7.

**3. Do you consider the Adur Local Plan to be unsound because it is not:
(tick as appropriate)**

3.1 Positively Prepared

3.2 Justified

3.3 Effective

3.4 Consistent with National Policy

4. If you consider the Adur Local Plan to be unsound or not legally compliant, please explain why in the box below:

The third bullet point under this paragraph covers extension of the membership of the Board to include Brighton and Hove and Lewes. However if this is going to be included then it needs to be revised.

Brighton were part of the Coastal West Sussex and Greater Brighton Strategic Planning Board formed in 2012, after issues of governance resulted from the need to achieve the place based approach of the intended Local Strategic Statement. It was in 2013 that Lewes were invited to become formal members of the Board rather than simply being observers, as had previously been the case.

More recently Mid Sussex requested to be considered for membership on the Board and this was agreed, due to already being

part of the Greater Brighton Economic Board. This should also be included within the document.

(Continue on a separate sheet if necessary)

5. Please explain in the box below what change(s) you consider necessary to make the Adur Local Plan legally compliant and sound having regard to the reason you identified above.

(You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested or revised wording of any policy or supporting text. Please be as precise as possible).

It is suggested that the third bullet point under this paragraph is removed and a new paragraph is inserted to cover how membership of the Board and Partnership have expanded.

(Continue on separate sheet if necessary)

6. If your representation concerns soundness or legal compliance and is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination? (tick as appropriate)

No, I wish to communicate through written representations

Yes, I wish to speak to the Inspector at the hearing sessions

Please note: The Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the hearing part of the examination.

7. If you wish to participate at the hearing part of the examination, please outline why you consider this to be necessary.

8. Please tick if you do not wish to be informed of the following:

- When the Plan has been submitted for Examination
- When the recommendations from the Examination have been
Published
- When the Local Plan has been adopted

What happens next?

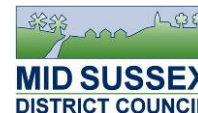
Representations made to the Council will be passed to the Inspector for consideration.

Once this has happened, the Inspector will commence the examination and give notice of the start of the hearing sessions.

Interested parties will be informed of the start date of the hearing sessions and the matters to be considered.

Thank you for making representations.

District Plan 2014 - 2031 Consultation Draft Consultation Response Form



The role of the District Plan is to say broadly what, where, when and how development will take place in Mid Sussex over the next 17 years. The overall strategy of the Plan is to support sustainable communities which promote the local economy, and provide the opportunity for residents to work within their communities and access other necessary services and facilities close to home.

Whilst the overall strategy of the Plan has not changed from the 2013 District Plan, we want to give residents and other interested parties an opportunity to comment on the updated wording of the text and policies, some of which have changed significantly since our last public engagement. These changes have been as a result of responses received, discussions with the professional and statutory bodies including the Planning Inspectorate and Department for Communities and Local Government, cooperation with other local authorities and changes in guidance and national policy.

The draft District Plan does not include a housing number, although it does include policies which allocate land at Burgess Hill for development. The housing number will be set once all of the technical work on need and capacity has been undertaken and discussions with our neighbouring authorities have concluded. There will be an opportunity to make comments on the housing numbers when the Plan is published in May 2015.



Information will only be used by Mid Sussex District Council and its employees in accordance with the Data Protection Act 1998. Mid Sussex District Council will not supply information to any other organisation or individual except to the extent permitted by the Data Protection Act and which is required or permitted by law in carrying out any of its proper functions.

The information gathered from this form will only be used for the purposes described and any personal details given will not be used for any other purpose.

We would like to hear your views on our District Plan 2014 – 2031 Consultation Draft. You can view the Document and background information and complete this form online at www.midsussex.gov.uk/districtplan

Respondent

Title		Initial		Surname	
Organisation (if applicable)		Arun District Council			
On behalf of (if applicable)					
House no. / name	Civic Centre	Street	Maltravers Road		
Town/Village	Littlehampton	Postcode	BN17 5LF		
Email	localplan@arun.gov.uk				
Please tick if you do not wish to be notified when a report summarising the issues raised and how these have been considered has been published (by email only)					

Do you have any comments to make on the Consultation Draft District Plan? Please set these out in the box below and continue on additional sheets if necessary.

It is acknowledged that the overall strategy of the Plan has not changed from the 2013 District Plan however there has been some updating of the policies and text since the last consultation following responses received and discussions with professional and statutory bodies.

It is further acknowledged that the Council is not yet in a position to confirm its housing provision figure which relies on the supply of housing land and consideration of any unmet need arising from neighbouring authorities, however, that this work is in progress and that the Council is working with neighbouring authorities to gain a clear picture of any unmet development needs.

The Council requests that it is kept informed of the outcomes of the technical work that is being undertaken in the light of Duty to Co-Operate and being part of the neighbouring Housing Market Area.

Further comments will be provided at Publication stage in May 2015.

Do you have any comments to make on the Sustainability Appraisal? Please set these out in the box below and continue on additional sheets if necessary.

Do you have any comments to make on the Habitats Regulations Assessments? Please set these out in the box below and continue on additional sheets if necessary.

Thank you for taking the time to consider these issues.

Please return all forms to Planning Policy, Mid Sussex District Council, Oaklands, Oaklands Road, Haywards Heath, West Sussex, RH16 1SS by 16th January 2015. If you require any advice on the completion of this form, please contact the Planning Policy Division on 01444 477053 or by email at LDFConsultation@midSussex.gov.uk.

Monitoring questions for District Plan Consultation

We want to make sure that everyone is treated fairly and equally and that no-one gets left out of consultation that is why we are asking you these questions. The completion of these questions is not compulsory and we will not share this information with anyone else. It will be used only to better inform future consultations.

1 - What is your main interest in the Mid Sussex District Plan?

Business Interest Representing an interest group Personal interest My job is to use the District Plan Student

Other (please specify) _____

2 - How did you find out about your chance to comment on the District Plan Consultation Draft?

'Key contact'⁽ⁱ⁾ LDF Alert⁽ⁱ⁾ Newspaper Word of mouth
 Parish Council District Councillor Mid Sussex Matters Other website
 Council website Other publication

Other (please specify) _____

Please specify (i.e. which newspaper, website, etc.) _____

3 - In what format have you viewed the District Plan Consultation Draft?

Paper copy Website

3a - If you used the website, did you encounter any problems accessing information?

Yes No If yes, please specify _____

4 - Did the information provided help you to understand...

	Yes	No
How to comment?	<input type="checkbox"/>	<input type="checkbox"/>
How comments will be considered?	<input type="checkbox"/>	<input type="checkbox"/>
The process of forming the District Plan?	<input type="checkbox"/>	<input type="checkbox"/>
What to do if you have any queries?	<input type="checkbox"/>	<input type="checkbox"/>

5 - Was the District Plan Consultation Draft...

	Yes	No
Well laid out?	<input type="checkbox"/>	<input type="checkbox"/>
Easy to read?	<input type="checkbox"/>	<input type="checkbox"/>
Maps easy to read?	<input type="checkbox"/>	<input type="checkbox"/>

⁽ⁱ⁾ If you are not already signed up to our Local Development Framework email alerts service, or not on our Key Contacts list, would you like to add your details to these lists? (Please tick relevant box). More details can be found at www.midsussex.gov.uk/ldfconsultation

LDF Alerts (Individuals and Organisations) Key Contacts List (Organisations Only)

Background Paper 4 - Responses to the Draft London and South East Route:
Sussex Area Route Study (Network Rail)

1) Below is the Officer response provided to West Sussex County Council to help inform their response to Network Rail:

Thank you for seeking Arun District Council's views on the Network Rail consultation: Draft London and South East Route: Sussex Area Route Study.

Set out below are Arun District Council's comments relating to the improvement of railway infrastructure in the area for consideration by Network Rail.

- 1) Arundel Chord – the Council would welcome investigation of whether the Arundel Chord could be used permanently as a regular route to London, with the potential journey saving time from Littlehampton to London of 20 minutes.
- 2) The Council would like to see improvements to the train services from Bognor Regis and Littlehampton to and from London in terms of duration, direct routes and timely availability with investment directed to Arundel and Ford to aid accessibility to and from London for residents of Bognor Regis and Littlehampton. The fast line to Brighton is considered slow.
- 3) The Council is keen for engagement from Network Rail regarding level crossings as it would like to see the removal of level crossings, where possible, and increased safety features such as pedestrian crossing bridges.
- 4) There is a need for additional car parking and a need to improve the existing car parking situation at Ford station. The car park at Barnham station is very busy and it would be beneficial to displace some of the traffic to Ford.
- 5) The Council would like to see capacity issues addressed to decrease the amount of people that have to stand on journeys to and from London.

We would be grateful if these comments could be fed into your response to Network Rail.

2) Below is the proposed response to Network Rail following the receipt of Members views:

Arun District Council has been consulted on the Network Rail Sussex Area Route Study via West Sussex County Council (WSSCC) who is co-ordinating a response from the Local Authorities in West Sussex and other organisations such as rail user and community organisations, as the local transport authority. Arun District Council provided the following response to WSSCC to be included within its response back to Network Rail:

Set out below are Arun District Council's comments relating to the improvement of railway infrastructure in the area for consideration by Network Rail.

- 1) Arundel Chord – the Council would welcome investigation of whether the Arundel Chord could be used permanently as a regular route to London, with the potential journey saving time from Littlehampton to London of 20 minutes.
- 2) The Council would like to see improvements to the train services from Bognor Regis and Littlehampton to and from London in terms of duration, direct routes and timely availability with investment directed to Arundel and Ford to aid accessibility to and from London for residents of Bognor Regis and Littlehampton. The fast line to Brighton is considered slow.
- 3) The Council is keen for engagement from Network Rail regarding level crossings as it would like to see the removal of level crossings, where possible, and increased safety features such as pedestrian crossing bridges.
- 4) There is a need for additional car parking and a need to improve the existing car parking situation at Ford station. The car park at Barnham station is very busy and it would be beneficial to displace some of the traffic to Ford.
- 5) The Council would like to see capacity issues addressed to decrease the amount of people that have to stand on journeys to and from London.

We would be grateful if these comments could be fed into your response to Network Rail.

In addition to the comments made to WSCC, Arun District Council would also like to take the opportunity to respond directly to Network Rail to raise a few additional, more detailed points. These points are set out below:

- 1) There are concerns that the assessment of the Arundel Chord cost / benefit analysis only addresses journey time factors from Brighton to Horsham, stating that the existing route from Brighton to Horsham via a change at Three Bridges would remain quicker – while that is no doubt true, the same analysis does not consider the journey time advantages that would follow any other Coastway West station (Shoreham, Worthing, Angmering etc.) It also doesn't take into account the number of occurrences of Brighton mainline temporary diversions, therefore, appearing to suggest there is always a perfect service on the Brighton mainline.
- 2) There are concerns that all the comparisons in the assessments are entirely rail related and do not take into account other transports / road competition i.e. the A24 would compete with the Arundel Chord and the potential advantages beyond rail have not been taken into account.
- 3) The Arun Valley line is considered by Southern to be a major access route to the South Downs National Park, but it does not have any reference within the study.
- 4) It is welcomed that the study refers to the Arundel Chord, however, it is acknowledged that it is identified as a low priority. It is considered that if the Arundel Chord could be used as a regular route to London, it would allow for

easier flow of traffic to and from Littlehampton and as a diversion if the Brighton mainline was blocked.

- 5) The plans for Thameslink trains to come to Bognor Regis and Littlehampton should be reinstated.

We would be grateful if these comments could be taken into consideration for the next stage of the process.