



Arun District Council Local Planning Authority

Ford Neighbourhood Development Plan 2 (2024-2041) DECISION STATEMENT

February 2025

1.0 INTRODUCTION

- 1.1 Under the Town and Country Planning Act 1990 (as amended), the Council has a statutory duty to assist communities in the preparation of neighbourhood development plans and orders and to take plans through a process of examination and referendum. The Localism Act 2011 (Part 6 chapter 3) sets out the Local Planning Authority's responsibilities under Neighbourhood Planning.
- 1.2 This report confirms that **ALL** the modifications proposed by the Examiner's report have been accepted, the Ford Neighbourhood Development Plan 2 (2024-2041) has been altered as a result of it; and that this Plan does not require a referendum before it can proceed to be 'made' by Arun District Council.

2.0 BACKGROUND

- 2.1 The Ford Neighbourhood Plan relates to the area that was designated by Arun District Council as a neighbourhood area on 6 December 2013. This area is coterminous with the Ford Parish Council boundary that lies within the Arun District Council Local Planning Authority Area.
- 2.2 Following the submission of the Ford Neighbourhood Plan Review to the Council, the plan was publicised and representations were invited. The publicity period was 19 September 2024 until 31 October 2024 (by 5pm).
- 2.3 Mr Andrew Ashcroft was appointed by Arun District Council with the consent of the Parish Council, to undertake the examination of the Ford Neighbourhood Plan 2 (2024-2041) and to prepare a report of the independent examination.
- 2.4 There are three types of modification which can be made to a neighbourhood plan or order, namely - minor (non-material) modifications to a neighbourhood plan or order which –

1. would not materially affect the policies in the plan or permission granted by the order, or
2. material modifications which do not change the nature of the plan or order, and which would require examination but not a referendum, or
3. material modifications which do change the nature of the plan or order - would require examination and a referendum.

2.5 Given the nature of the policies in the submitted review of the Neighbourhood Development Plan, the Examiner's report concludes that subject to making the material modifications recommended by the Examiner, the Plan meets the basic conditions set out in the legislation, the modifications do not change the nature of the Plan so require examination but does not need a referendum and therefore the Plan should proceed to be 'made' by Arun District Council.

2.6 Having considered each of the recommendations made in the Examiner's report, and the reasons for them, the Parish Council and Arun District Council have agreed to **ALL** the modifications to the draft plan referred to in section 3 below, to secure that the draft plan meets the basic conditions set out in legislation.

3.0 DECISION

3.1 The Neighbourhood Planning (General) Regulations 2012 requires the local planning authority to outline what action to take in response to the recommendations of an Examiner made in a report under paragraph 10 of Schedule 4A to the 1990 Act (as applied by Section 38A of the 2004 Act) in relation to a neighbourhood development plan.

3.2 Having considered each of the recommendations made by the Examiner's report, and the reasons for them, Arun District Council in consent with Ford Parish Council have decided to accept **ALL** the modifications to the draft plan. Table 1 outlines the alterations made to the draft plan under paragraph 12(6) of Schedule 4B to the 1990 Act (as applied by Section 38A of 2004 Act) in response to each of the Examiner's recommendations and the justification for them.

4.0 INSPECTING THE DECISION

4.1 The post examination Neighbourhood Plan, Examiner's Report and the Council's (ADC) Decision Statement can be viewed on the council's website at: [Ford neighbourhood development plan 2 | Arun District Council](#).

Hard copies of the examiner's report and decision statement can also be viewed at the following locations between 9am to 4pm (weekdays) with the exception of Wednesdays (when the receptions open at 11am):

1. Arun Civic Centre, Maltravers Road, Littlehampton
2. Bognor Regis Town Hall, Clarence Road, Bognor Regis

Table 1: Recommendations and justification by the Examiner

Policy	Recommended Modification	Justification
SP1 Spatial Plan for the Parish	<p>Replace ‘<i>they are sited within the settlement boundary of the built up area as defined on the Proposals Map</i>’ with ‘<i>they are sited within the built up area boundary as defined on the Policies Map</i>’.</p>	<p>Recommend that the wording used in the policy is consistent with that used throughout the Plan. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of each the three dimensions of sustainable development.</p>
BUA1 Built Up Area (BUA) boundary	<p>Replace ‘<i>acceptable</i>’ with ‘<i>supported</i>’</p> <p>Display the policy in bold text</p>	<p>Recommend a modification to the wording used in the policy to ensure that it is consistent with the wording used elsewhere in the Plan and reflects the maturing approach now taken in neighbourhood plans. I also recommend that the policy is shown in bold text. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of each of the three dimensions of sustainable development.</p>
SA1 Ford Airfield	<p>No changes are proposed to this policy.</p>	<p>I have considered this matter carefully. On the balance of the evidence, I am satisfied that the retention of the policy in the Plan meets the basic conditions. I have reached this conclusion for the following reasons:</p> <ul style="list-style-type: none"> • the approach taken complements the approach taken in the adopted Local Plan; • the policy identifies specific matters to be addressed in the master plan; and • the approach taken is actively supported by the developer of the strategic site (and reflects its ongoing discussions with FPC). <p>In this context I am satisfied that the policy will contribute to the delivery of each the three dimensions of sustainable development.</p>

Policy	Recommended Modification	Justification
EH1 Protection of trees and hedgerows	<p>In the first part of the policy replace ‘<i>should be refused</i>’ with ‘<i>will not be supported</i>’</p> <p>Delete the eighth and ninth parts of the policy</p> <p>Delete the eleventh part of the policy</p> <p><i>Delete EH1.2</i></p> <p><i>At the end of EH1.3 add the deleted eleventh part of the policy</i></p>	<p>I recommend a modification to the wording used in the first part of the policy so that it is consistent with the wording used elsewhere in the Plan and recognises the role of a neighbourhood plan within the wider development management process.</p> <p>The eleventh part of the policy draws attention to Appendix 1 of the Plan. This explains how the policy will be implemented rather than operating as a land use policy. As such I recommend that it is deleted and repositioned into the supporting text.</p> <p>Otherwise, the (now saved) policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.</p>
EH2 Renewable Energy	No changes are proposed to this policy.	I am satisfied that the policy has regard to Section 14 of the NPPF and the Written Ministerial Statement – Planning: Local Energy Efficiency Standards Update (December 2023). It meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.
EH3 Conserving and Enhancing Non-designated Heritage Assets	No changes are proposed to this policy.	In the round I am satisfied that the policy has regard to Section 16 of the NPPF and meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.
EH4 Surface water management	<p>Replace the policy with:</p> <p><i>‘Wherever practicable, development proposals should reduce the overall level of flood risk. This will be achieved through</i></p>	I recommend that the opening element of the policy is recast so that it has the clarity required by the NPPF and can be implemented through the development management

Policy	Recommended Modification	Justification
	<p><i>the application of the following principles:</i></p> <ul style="list-style-type: none"> • <i>where appropriate, surface water management measures should ensure that the risk of flooding both on-site and downstream is not increased;</i> • <i>where it is appropriate to do, development proposals should incorporate Sustainable Urban Drainage Systems as alternative to conventional drainage;</i> • <i>any site-specific Flood Risk Assessments associated with development proposals should demonstrate that the development will be safe, including access and egress and without increasing flood risk elsewhere and reduce flood risk overall; and</i> • <i>the avoidance of the use of culverts and/or the constriction of watercourses and their immediate environs.'</i> <p>At the end of paragraph EH4.2 add:</p> <p><i>'Policy EH4 sets out a series of principles to achieve appropriate water management. In relation to the first principle, no development shall commence until full details of the proposed surface water drainage scheme have been submitted to and approved in writing by the District Council. No building shall be occupied until the complete surface water drainage system serving the property has been implemented in accordance with the agreed details. In relation to the second principle, sustainable drainage systems on private property, whether they are private or adopted, must be approved by the District Council (having consulted the relevant SUDS Lead</i></p>	<p>process. Its reference to the need for development proposals to aim to reduce the overall level of flooding in the parish is unclear. I recommend that the policy should recognise the practicability of its intentions. I also recommend that the wording used in the various principles are modified so that they flow more naturally from the modified opening element.</p> <p>Within this context I recommend that supplementary text in the principles are repositioned into the supporting text. This acknowledges that they explain the way in which the policy will be applied rather than being land use policies.</p> <p>Otherwise, I am satisfied that the policy has regard to Section 14 of the NPPF and meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.</p>

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	<p><i>Local Flood Authority) prior to the commencement of development. In relation to the third principle, any proposed mitigation measure proposed as part of the Flood Risk Assessment must be deliverable and sustainable, including details for the provision of long-term maintenance and management of any new feature for the lifetime of the development.'</i></p>	
<p>EH5 Grade 1, 2 and 3a Agricultural Land</p>	<p>Replace the policy with: 'Development proposals will not be supported on Grade 1, 2 and 3a Agricultural Land other than:</p> <ul style="list-style-type: none"> • where the land concerned is allocated for development in the development plan; • where the development is required for the operational needs of agriculture; and • where the benefits that would arise from the development proposed would outweigh the need to protect such land in the long term.' <p>Replace EH5.1 with:</p> <p><i>'Policy EH5 sets out to safeguard future food production, and in turn, future employment in the locality, and to maintain the rural aspect of the parish. The references to the grade of agricultural land in the policy are to those on the Agricultural Land Classification Map produced by Natural England (available on the Open Gov data website). The policy does not affect permitted development rights relating to agricultural development. The policy also acknowledges that not all agricultural development is permitted development.'</i></p>	<p>I concur with ADC's comments. The policy is very matter of fact and does not provide the flexibility for development proposals as now captured in the NPPF. I recommend that the policy is recast so that it can accommodate a further exception to those already included in the policy. In doing so I recommend that the references to permitted development and the source of the agricultural land classification are relocated into Ford Neighbourhood Development Plan 2 – Examiner's Report 21 the supporting text. This acknowledges that it describes how the policy will be applied rather than being a land use policy.</p> <p>Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.</p>
<p>EH7 Local Gap</p>	<p>At the end of EH7.1 add:</p> <p><i>'West Sussex County Council preferred site for the provision of a new secondary school to meet identified education needs (known as</i></p>	<p>The policy comments that within the Local Gap development will not be permitted unless it does not prejudice the openness of the Local Gap. The supporting text</p>

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	<p><i>Site F) is within the Local Gap. The requirement for a new secondary school is set out in Policy INF SP2 of the adopted Arun Local Plan 2018 which requires a minimum of one 6 form entry Secondary School with expansion land for a 4-form entry expansion adjacent shall be provided on a site of at least 10 hectares to serve the new growth in Arun District. Should Site F be selected as the site for the School, the planning application will need to consider the way in which its development would comply with the requirements of Policy EH7 of the neighbourhood plan and the wider development plan.'</i></p>	<p>advises that the Local Gap will prevent coalescence between Yapton and Ford and preserve their separate identities. It reinforces that this issue is important to residents who do not wish to see further development extending to the west of Ford.</p> <p>ADC and West Sussex County Council comment separately about the County Council's preferred site for the provision of a new secondary school to meet the identified education needs in the County (known as Site F) and its relationship with the Local Gap. ADC advised that:</p> <p><i>'The policy should be deleted in its entirety, or, in the alternative, the wording should be amended to allow for the delivery of a new secondary school site of at least 10 hectares in size within the proposed Local Gap, as an exception to the draft policy. Alternatively, a specific allocation for a secondary school could be included within the NP on the basis that it would provide the necessary infrastructure to support allocations in the both the adopted Arun Local Plan and the Ford NP.'</i></p> <p>In its response to the clarification note, FPC commented that:</p> <p><i>'(it) has always contested this site as a location for the Secondary School due to the Local Gap allocation and to the unsuitability of the surrounding infrastructure to support such an allocation. The preferred site of both (Ford and Yapton</i></p>

Policy	Recommended Modification	Justification
		<p><i>Parish Councils) is land owned by WSCC at Choller Farm. (FPC) do not believe that the construction of a school could do anything other than undermine the function of the gap.'</i></p> <p>I have considered these different approaches very carefully. I am not satisfied that ADC's suggestion that the policy is deleted would be in the best interests of planning in this part of the district. Plainly the Local Gap serves a broader purpose in separating the two communities. In addition, the proposed site for the School (known locally as Site F) is the County Council's preferred location, and discussions are taking place with the landowners. In these circumstances there is no clarity on the site on which the school will proceed. In addition, there is no specific information about the potential impact of the development of a school on the openness of the Local Gap.</p> <p>In all the circumstances, I recommend that the supporting text is expanded to identify that part of the Local Gap is being considered as a potential site for a new school. The text should also advise that, that if Site F is selected, the planning application will need to consider the way in which its development would comply with the requirements of the policy and the wider development plan.</p> <p>Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental</p>

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		dimensions of sustainable development.
EH8 Light Pollution	<p>Replace the policy with:</p> <p>‘Development proposals should respect the unlit environment of the neighbourhood area and take all appropriate opportunities to reduce light pollution. New lighting should conform to the highest standard of light pollution restrictions in force at the time. Security and other outside lighting on private and public premises (including floodlighting at equine establishments and on sports fields or sports grounds) should respond positively to the location of any neighbouring residential properties and safeguard their amenities.</p> <p>Wherever practicable, all new roads within development proposals should not feature street lighting.</p> <p><i>Development proposals which detract from the unlit environments of the parish will not be supported.</i></p>	<p>The policy comments that development proposals which detract from the unlit environments of the Parish will not be supported. It also advises that development proposals should respect the unlit environment of the neighbourhood area and take all appropriate opportunities to reduce light pollution.</p> <p>I recommend that the policy is recast for two reasons. The first is to rearrange the order of the various components so that it has a positive rather than a negative focus. The second is to break down the parts of a long policy into its separate components. In both cases this will bring the clarity required by the NPPF. The overall effect of the policy remains unaffected.</p> <p>Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.</p>
EH9 Route of the former Portsmouth to Arundel Canal	<p>Replace the policy with: ‘In designing the re-purposed Ford section of the Canal, the original canal route should be configured in a way which complements its history, and preserves any remaining artefacts and land features.’</p>	<p>The policy advises that when designing the repurposed Ford section of the Canal, the original canal route should be designed to complement its historic past, preserve any remaining artefacts, and land features and its history clearly shown for future generations. The supporting text advises that the former historic Hunston to Ford canal (Part of the London to Portsmouth Canal) crosses the parish. In the Local Plan the canal is protected. In addition, ADC's Active Travel Plan looks to the Canal route not only being protected but further enhanced</p>

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		<p>and repurposed into an Active Travel Greenway Route. FPC fully supports this vision and requires any development to be complementary to this vision.</p> <p>I recommend that the policy is recast so that it has the clarity required by the NPPF and can be applied through the development management process. Otherwise, it meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.</p>
EE1 Support for business	No changes are proposed to this policy.	I am satisfied that the policy has regard to Section 6 of the NPPF. It meets the basic conditions. It will contribute to the delivery of the economic dimension of sustainable development.
EE2 Retention of employment land	<p>Replace ‘permitted’ with ‘supported’.</p> <p>Delete the final sentence.</p> <p><i>At the end of paragraph EE2.1 add: ‘The exception to the policy will be the land specified in Policy EE11 if that policy was to be implemented.’</i></p>	<p>In general terms, I am satisfied that the policy has regard to Section 6 of the NPPF. However, I recommend a modification to the wording used in the policy so that it more fully acknowledges the role played by a neighbourhood plan in the planning process. I also recommend that the final sentence of the policy is repositioned into the supporting text. This acknowledges that it identifies an exception to the policy rather than being a land use policy.</p> <p>Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the economic dimension of sustainable development.</p>
EE3 Protection of existing businesses	No changes are proposed to this policy.	I am satisfied that the policy has regard to Sections 6 and 8 of the NPPF. It meets the basic

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		conditions. It will contribute to the delivery of the economic dimension of sustainable development.
EE4 Support for new commercial uses	<p>In the first part of the policy replace ‘New commercial uses which seek to provide’ with ‘Proposals for’</p> <p>Replace the final sentence of the first part of the policy with: Proposals for the change of use of buildings to Class B2 uses (general industry) or Class B8 (distribution and storage) will not be supported.</p>	<p>In general terms the updates to the policy have been carefully considered and have regard to Section 6 of the NPPF. Within this context I recommend modifications to two parts of the policy to allow ADC to be able to apply its contents with clarity in the development management process.</p> <p>Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the economic dimension of sustainable development.</p>
EE5 Tourism activities	<p>In the final sentence of the second part of the policy replace ‘development’ with ‘Development proposals’</p>	<p>The policy advises that sustainable tourism which is appropriate to the overall character of the village will benefit the local economy but must be balanced against the need to protect the existing character of the built environment, the rural landscape and biodiversity.</p> <p>I recommend a specific modification to the wording used in the second part of the policy to bring the clarity required by the NPPF and to ensure consistency with the language used throughout the Plan. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.</p>
EE6 Communications infrastructure.	<p>Replace the policy with: ‘Proposals that will contribute to the provision of improved and/or additional connectivity for the overall parish be supported where they respond positively to the siting, design and impact on</p>	<p>I recommend that the first sentence of the policy (on the connection of new development to high quality communications infrastructure) is deleted given that this matter is now addressed nationally in the Building Regulations. I</p>

Policy	Recommended Modification	Justification
	<p>adjoining premises, wider views, and the landscape.'</p> <p>At the end of EE6.1 add: 'The connection of new development to the internet is now controlled nationally through the Building Regulations.'</p>	<p>recommend that the supporting text is expanded to highlight this changed legislative matter. I also recommend that the second part of the policy is recast so that it has the clarity required by the NPPF and has a similar format to that of the other policies in the Plan.</p> <p>Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.</p>
EE7 Sustainable Commercial Buildings	<p>Replace the first part of the policy with: 'Where it would be practicable to do so, proposals for commercial and employment development should be designed to provide secure parking and storage of bicycles for customers and employees consistent with the most up to date standards produced by West Sussex County Council and Arun District Council.'</p>	<p>In general terms the policy takes a positive approach to this matter. Nevertheless, I recommend that the first part of the policy is recast so that it more clearly sets out its requirements. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.</p>
EE9 Rural Buildings	<p>Delete 'in principle'</p>	<p>I recommend the deletion of 'in principle' from the wording in the policy. It brings no added value to a criteria-based policy. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.</p>
EE10 Quality of Design of commercial buildings	<p>Replace 'must' with 'should'</p>	<p>The policy comments that proposals for new or extension or alteration of existing commercial premises must be of high-quality design, be energy efficient and designed to be in harmony with the landscape setting and contribute positively to the environment.</p> <p>I recommend that the word 'must' is replaced by 'should' to recognise the role of a</p>

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		neighbourhood plan in the planning process. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.
EE11 Ford Industrial Estate	Replace 'would' with 'will'	<p>The policy comments that proposals to relocate Ford Industrial Estate to land within the Master Plan site and re-use the land for housing would be supported once the replacement employment space has been provided.</p> <p>I recommend that the word 'would' is replaced by 'will' to recognise the role which will be played by such proposals. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.</p>
LC1 Support Independent Living	No changes are proposed to this policy.	<p>The policy comments that new, converted and extended independent living and care homes will be supported within the BUA provided that the design and scale of development are in keeping with the character of the location and that the impact on the amenity of surrounding residential properties is acceptable.</p> <p>I am satisfied that the policy has regard to Sections 5 and 8 of the NPPF. It meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.</p>
LC2 Healthcare facilities	No changes are proposed to this policy.	It comments that proposals for new D1 uses, including medical facilities will be supported within the BUA. The supporting text advises that

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		<p>there is no medical provision in Ford.</p> <p>I am satisfied that the policy has regard to Section 8 of the NPPF. It meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.</p>
<p>LC3 Protection of assets of community value</p>	<p>Replace the second sentence with: ‘Proposals that would result in the loss of such a property or in significant harm to its community value will not be supported, unless it can be demonstrated that the continued operation of the property as community asset is no longer economically viable.’</p> <p>Delete the third sentence.</p> <p>At the end of paragraph LC3.1 add: <i>‘Policy LC3 addresses this important matter. It advises that proposals that would result in the loss of such a property or in significant harm to its community value will not be supported, unless it can be demonstrated that the continued operation of the property as community asset is no longer economically viable. In practical terms, this would mean the site has been marketed at a reasonable price for at least a year for that and any other suitable employment or service trade uses and no interest in acquisition has been expressed. This will be a matter for the District Council to apply through the development management process.’</i></p>	<p>The policy comments that proposals that will enhance the viability and/or community value of any property that has been included in the register of Assets of Community Value will be supported. It also advises that proposals that result in the loss of such a property or in significant harm to its community value will be resisted, unless it can clearly be demonstrated the continuing operation of the property is no longer economically viable.</p> <p>In general terms the policy continues to respond positively to Section 8 of the NPPF. However, within this context I recommend that the second sentence of the policy is recast so that it more clearly sets out its purpose. I also recommend that the third sentence is deleted and repositioned into the supporting text. This acknowledges that it comments about the way in which the policy will be implemented.</p> <p>Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.</p>

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LC5 Camping and Caravanning	No changes are proposed to this policy.	<p>It comments that land allocated on the Proposals Map at the Ship and Anchor PH will be retained as a camping and caravanning site.</p> <p>I am satisfied that the policy has regard to Sections 6 and 8 of the NPPF. It meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.</p>
LC6 Local Open Space	Replace 'permitted' with 'supported'	<p>This policy includes material modifications which FPC considers does not change the nature of the Plan. The policy is amended to comment about football pitches at Arun Sports Arena.</p> <p>The policy advises that the areas listed in Schedule A are designated as Local Open Space. It also comments that proposals for development in these areas will not be permitted unless it can be demonstrated that the benefits of the development outweigh any identified harm.</p> <p>In general terms the policy continues to respond positively to Section 8 of the NPPF. However, within this context I recommend that the wording used is modified so that it properly reflects the role of a neighbourhood plan in the planning process. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.</p>
LC7 Contributions to new infrastructure and facilities New Policy	<p>Delete the policy</p> <p><i>Delete the supporting text.</i></p>	I have considered the policy and the comments received very carefully. In principle it would be appropriate for the Plan to supplement the approach taken in the Local

Policy	Recommended Modification	Justification
		<p>Plan about the delivery of community facilities. In addition, the schedule of facilities is typical of what would normally be delivered within a strategic allocation. Nevertheless, the approach taken is prescriptive and has not been tested for its effect on the financial viability of the development of the strategic site. I note the comments about the approach being underpinned by the Action in Rural Sussex report. However, that report is dated.</p> <p>In all the circumstances I recommend that the policy is deleted. I also recommend that the supporting text is deleted.</p>
H1 Quality of Design	Replace the three uses of ‘must’ with ‘should’.	<p>The policy comments that proposals for new housing or extension or alteration of existing housing must be of high quality and designed to be sympathetic to the local design style and contribute positively to the environment. It also advises that proposals for major development must demonstrate how they meet the policies set out in this Plan and through their Design and Access Statement demonstrate how the character of the parish will be reinforced</p> <p>In the round the policy continues to take a good approach towards design. It is a good local interpretation of Section 12 of the NPPF. In this context I recommend that the three uses of must in the policy are replaced with should. This will more properly reflect the role of a neighbourhood plan in the wider planning process.</p> <p>Otherwise, the policy meets the basic conditions. It will</p>

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		contribute to the delivery of the social and the environmental dimensions of sustainable development.
H2 Housing Mix	<p>Replace the policy with: ‘Proposals for new housing should deliver a range of house types and tenures including bungalows, sheltered accommodation, self-build, and shared equity properties as informed by the latest Strategic Housing Market Area Assessment.’</p>	<p>ADC suggest that the policy should refer to the appropriate Strategic Housing Market Area Assessment (SHMAA), and the need for development proposals to be consistent with its findings. It also comments that the draft policy does not provide sufficient justification. I agree with the comments on the SHMAA and recommend accordingly. Plainly it is important that any development proposals respond positively to the most up to date information on housing needs. This will ensure that the policy has regard to Section 5 of the NPPF.</p> <p>Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.</p>
H3 Windfall Sites	<p>Replace the opening element of the policy with: ‘Proposals for residential development on infill and redevelopment sites within the built-up area boundary (as shown on the Policies Map) will be supported where they meet all of the following criteria:’</p> <p>In v) replace ‘over 11 units’ with ‘11 homes or more’</p> <p>Replace the second sentence of vi) with: ‘Proposals which would involve the arbitrary subdivision of land, or which would result in piecemeal development, will not be supported.’</p> <p>Replace viii) with: ‘Wherever practicable, development</p>	<p>In general terms the policy takes a positive approach to windfall sites and has regard to Section 5 of the NPPF. Nevertheless, to bring the clarity required by the NPPF and to allow ADC to apply its provisions through the development management process, I recommend the following modifications:</p> <ul style="list-style-type: none"> • a recasting of the open element of the policy so that it clarifies that development proposals which meet the criteria in the policy will be supported; • revisions to the wording used in the opening element of the policy so

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	<p>proposals should use previously-developed land.'</p>	<p>that they relate to the language used more generally in the Plan on the BUAB and the Policies Map;</p> <ul style="list-style-type: none"> • revisions to criterion v so that it is consistent with the approach taken in the adopted Local Plan; • a recasting of criterion vi so that it better relates to the modified opening element of the policy; and • a recasting of criterion viii to acknowledge that a land use planning policy cannot comment about a preference for land use (or in this case the nature of the land concerned) for windfall development. The development management system assesses development proposals on their merits. It also acknowledges that developers will not usually control a range of sites which would allow a degree of choice to be applied. <p>Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.</p>
<p>H4 Recreational Space</p>	<p>Replace the policy with:</p> <p>'Proposals for new housing development should include good quality outdoor amenity space (either private gardens or a shared amenity area) and, where practicable, should contribute to providing tree cover and improved biodiversity.</p>	<p>It comments that proposals for new housing development should include good quality outdoor amenity space – either private gardens or a shared amenity area and should contribute to providing tree cover and improved biodiversity.</p>

Policy	Recommended Modification	Justification
	<p>The amount of land used for garden or amenity space should be commensurate with the size and type of dwelling and the character of the area, and should be of appropriate utility (for play and recreation) and quality having regard to topography, shadowing (from buildings and landscape features) and privacy.'</p>	<p>In general the policy takes a positive approach to these issues. Nevertheless, I recommend that the first part of the policy is modified so that it acknowledges that its approach may not always be practicable. I also recommend modifications to the wording used in the second element of the policy so that it better expresses its intentions.</p> <p>Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.</p>
<p>H6 Integration of New Housing</p>	<p>Replace 'must' with 'should.'</p>	<p>It comments that proposals for new housing must ensure that the new homes are well connected to the surrounding area and visually integrated with their surroundings.</p> <p>In general, the policy takes a positive approach to this matter. Nevertheless, I recommend a modification to the wording used so that the policy properly reflects the role of a neighbourhood plan in the wider planning process. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.</p>
<p>GA1 Footpath, bridlepath, and cycle path network</p>	<p>Replace the policy with:</p> <p>'Development proposals that incorporate improvement and/or extensions to the existing footpath, footway, bridlepath, and cycle path network which allow better access to the local amenities and services, to green spaces, and to the open countryside will be supported.'</p>	<p>The policy comments that development proposals that improve and extend the existing footpath, footway, bridlepath, and cycle path network, allowing better access to the local amenities and services, to green spaces, to any new housing and to the open countryside will be supported. It also advises that the loss of existing footpaths,</p>

Policy	Recommended Modification	Justification
	<p>Development proposals which propose alterations and enhancements to footpaths, footways, cycle paths and bridleways should ensure that the resulting routes are sensitively screened and/or fenced from existing properties.</p> <p>Development proposals which would involve the loss of existing footpaths, footways, bridlepaths, and cycle paths will not be supported.</p>	<p>footways, bridlepaths, and cycle paths will be resisted. It comments that alterations and enhancements to footpaths, footways, cycle paths and bridleways must ensure that they are adequately screened and fenced from existing properties.</p> <p>The policy takes a positive approach to these matters and has regard to Sections 8 and 9 of the NPPF. Nevertheless, I recommend that the policy is broken down into its separate component parts, and that some of the wording is modified. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.</p>
GA2 Parking and new development	<p>Replace the policy with:</p> <p>Development proposals should include off street parking consistent with the current local standards. Wherever practicable, vehicle parking should be accommodated within the development site concerned.</p> <p>Development proposals that would reduce the amount of off-street parking currently available will only be supported if they make appropriate provision for equivalent off-street parking nearby. Parking spaces provided in connection with such proposals should be made available in perpetuity</p>	<p>The Plan advises that the context to the policy is that the way in which car parking is designed into new residential development will have a major effect on the quality of the development.</p> <p>I recommend modifications to the two separate parts. The recommendation in relation to the first part results in a more general policy rather than one related to residential development (and which comments about garages). Plainly the provision of a garage would contribute to meeting local parking standards.</p> <p>Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.</p>
GA3 Streets and Access Ways to	Replace policy with:	The Plan advises that the context to the policy is that the

Policy	Recommended Modification	Justification
serve new development	<p>'New residential streets and access ways should be designed with appropriate emphasis on pedestrians and cyclists as well as vehicles.</p> <p>Quieter streets should be designed to be suitable for a range of social activities, such as children's play.</p> <p>Wherever practicable, building frontages should overlook streets and other routes.'</p> <p><i>Replace paragraph GA3.1 with: 'The design of streets can help to make residents feel safe and in control of their environment. Improvements in safety for users can be achieved by reductions in speed. 20mph will generally be the maximum design speed that is considered appropriate for new streets within the residential development.'</i></p>	<p>design of streets can help to make residents feel safe and in control of their environment. Improvements in safety for users can be achieved by reductions in speed.</p> <p>I recommend modifications to the wording of the policy to bring the clarity required by the NPPF. I also recommend that the final element of the policy is relocated into the supporting text. Traffic speed is a highways matter rather than a land use issue. Furthermore, the design of residential streets is appropriately addressed by the three remaining elements of the policy. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.</p>
OTHER MATTERS		
Other Matters - General	<p><i>Modification of general text (where necessary) to achieve consistency with the modified policies and to accommodate any administrative and technical changes.</i></p>	<p><i>This report has recommended a series of modifications both to the policies and to the supporting text in the submitted Plan. Where consequential changes to the text are required directly because of my recommended modification to the policy concerned, I have highlighted them in this report. However other changes to the general text may be required elsewhere in the Plan because of the recommended modifications to the policies. Similarly, changes may be necessary to paragraph numbers in the Plan or to accommodate other administrative matters. It will be appropriate for ADC and FPC to have the flexibility to make any necessary consequential changes to the</i></p>

Policy	Recommended Modification	Justification
Other Matters – Specific	<p><i>The Policies Map should be provided at a more readable scale and the BUAB should be more clearly shown on the Map;</i></p> <p><i>The Policies Map legend should be made clearer by using different colours; and</i></p> <p><i>On Plan 8 the numbers should be shown more clearly. In addition, there is a number 10 that is not listed in the key.</i></p>	<p><i>general text. I recommend accordingly.</i></p> <p>ADC has made a series of helpful comments on the Plan. I have included them in the recommended modifications on a policy-by-policy basis where they are required to ensure that the Plan meets the basic conditions.</p> <p>I also recommend other modifications to other elements of the Plan based on ADC’s comments insofar as they are necessary to ensure that the Plan meets the basic conditions. In the main they bring clarity to maps in the Plan.</p>
Monitoring and Review	<p><i>At the end of paragraph 1.13 add:</i></p> <p><i>‘In this broader context, the adoption of the Arun Local Plan Review will be a key stage in the update of the development plan. The Parish Council will consider the need or otherwise for the full or partial review of the Ford Plan 2 within six months of the adoption of the emerging Local Plan Review.’</i></p>	<p>Section 1 of the Plan addresses the monitoring and review of the Plan in a very positive way. It acknowledges that the ongoing review of the development plan is now a fundamental element of the planning system.</p> <p>Paragraph 1.13 anticipates a further review of the Plan. This would be best practice. In this overall context, I recommend that it comments that FPC will consider the need for the full or partial review of Plan 2 within six months of the adoption of the emerging Local Plan. Plainly this will be a key stage in the update of the development plan. In addition, this approach will provide assurance to all concerned that the neighbourhood plan will remain up-to-date and relevant.</p>

4.0 CONCLUSION

- 4.1 I confirm that the **Ford Neighbourhood Development Plan 2 (2024-2041)**, as revised, complies with the legal requirements and basic conditions set out in the Localism Act 2011, and can therefore proceed to be ‘made’ at Full Council.
- 4.2 I recommend that the Ford Neighbourhood Development Plan 2 (2024-2041) should proceed to be ‘made’ but does not require a referendum, based on the neighbourhood area designated by Arun District Council on 6 December 2013 and the area extension in the Examiner’s report.
- 4.3 I am taking the abovementioned decision as I concur with the advice contained in the above report in response to the recommendations of the Examiner made in a report under paragraph 10 of Schedule 4B to the 1990 Act (as applied by section 38a of the 2004 Act) in relation to the Neighbourhood Development Plan.
- 4.4 I declare that I have no personal or prejudicial interest in respect of this decision.

Signed:



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Group Head of Planning

Decision published on: 19 February 2025