

Ms M Chaffe  
Ford Neighbourhood Plan Group

By email

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Dear Ms Chaffe

**Ford Parish Council Neighbourhood Development Plan 2022-2031  
Regulation 14 Consultation 2023**

Vail Williams LLP has been instructed by the landowner to submit representations on their behalf in respect of the Ford Parish Council Neighbourhood Development Plan 2022-2031 Regulation 14 Consultation.

We welcome the opportunity to comment on the Neighbourhood Plan and are supporting of the process as in accordance with the NPPF.

By way of context, the landowner owns land to the north of Yapton and west of Church Farm which straddles the parish boundaries of Yapton and Ford.



The site has been put forward for the Arun District Council's (ADC) consideration under the HELAA 2018, 2019, 2020, 2021 and 2022 and is proposed to deliver a school and Phase 1 of residential development within the Ford parish boundary with open space and Phase 2 residential development located in Yapton parish.



The site is currently open agricultural fields and adjoins Church Lane Conservation Area. There are two Grade II Listed buildings within 200 metres of the site. There are also a number of public rights of way traversing the site and the north-eastern corner of the site has been identified as a bio-diversity opportunity area.

The portion of the site within Ford parish is identified as local gap. Residential developments located to the south of the site and proposed residential/employment development is proposed to the east of the site.

In the HELAA Report 2021, the site (Reference: 18F2) has been assessed for development. ADC's assessment of the site notes that it is in the countryside and therefore development is contrary to policy, however, it is immediately adjacent to the built-up area of Yapton (and adjacent to the proposed development to the east) and is overall considered suitable for development, in a sustainable location with regard to access to services and facilities including potentially to Barnham and Ford railway stations. It states that development would need to respect the sensitive landscape inherited setting.

### **Proposed Development**

Whilst the proposals would involve building a school within the identified gap (together with up to 400 houses), the phased proposals could allow for land to be retained as "open" school playing fields and a significant amount of open space/country park which would be located between the two proposed phases of residential development, thus maintaining an element of gap between Yapton and Ford. This could be maintained in perpetuity.

### **Neighbourhood Plan Representations**

Following the above context, we provide the following representations on the draft Neighbourhood Plan (NP):-

Policy BUA1 details the built-up area boundary and states that outside the BUA, development will not be acceptable other than for the purposes of agriculture, forestry, recreation or where other policies within this plan indicate otherwise. It is considered that the built-up area boundary should be altered to reflect the proposals for a school and some residential development within the identified gap and that this gap should be re-drawn to accommodate this need as identified by West Sussex County Council.

It is noted that as detailed at Section 6.4 of the draft NP, that the built-up area boundaries have not yet been defined and is subject to consultation with key stakeholders and the community. The landowners will be pleased to meet with the Neighbourhood Plan Group to discuss the proposed development and a revision to the built-up area boundary or a redefinition of development that could be proposed within it.

It is noted that there are only two site allocations proposed within Ford parish (SA1 – Ford Airfield and SA2 – Burndell Road). Ford Airfield could provide 1,500 homes and Burndell Road is subject to a planning application for 45 homes.



Noting the assertion by the Neighbourhood Plan group that the plan is currently drafted to provide at least 1,545 dwellings (on the two sites identified above), it is considered an over-reliance on the Ford Airfield site to both come forward and deliver houses apace to maintain the requirements of the five-year housing land supply applicable across Arun district. It is considered that alternative sites should be identified in the short term to deliver houses more quickly and particularly those which could deliver a school as required by West Sussex County Council.

Draft Policy EH5 seeks to prevent development on agricultural land graded 1, 2 and 3A. It is considered this is unnecessary given the detail in draft Policy BUA1 which seeks to prevent any development on any land outside the built-up area boundary. This policy should be removed or combined with Policy BUA1.

Policy EE1 is supported in that it seeks to support development proposals to upgrade or extend the existing employment sites, subject to an assessment of harm to the amenities and surrounding properties. This should be amended to include a willingness to be flexible and allow a widening of uses from Class E(g) (Offices, research and development and industrial processes) AND B2 (Industrial) and B8 (Storage and distribution). Other employment generating use should also not be excluded subject to demonstration that there is a lack of demand for the aforementioned uses (ie. leisure, MOT stations etc).

Similarly, Policy EE2 relates to the retention of employment land. The flexibility to demonstrate that employment use is no longer viable following a marketing period of 12 months is supported in principle. However, marketing for 12 months is considered excessive and should be replaced by “at least six months marketing”. Twelve months marketing could have a severe impact on the viability of a commercial building if the existing employment use has vacated and there is no realistic prospect of re-letting for an employment-based use. If officers are concerned that allowing alternative uses into employment premises would result in a decline of available employment accommodation, then any application for a change of use could be subject to a condition that upon vacation of the unit by the alternative use, it should be returned to its former employment use and would thus not be lost from the employment market.

Policy EE4 should be amended to reflect changes to the Use Classes Order in 2020 and should relate to Class E(g). The restrictions do not allow B2 or B8 uses within the parish boundary and the policy does not recognise that many industrial and storage businesses in the area use much smaller vehicles than the large HGVs cited as ‘damaging to the area’ within the draft Neighbourhood Plan. Is this a stance supported by the Highway Authority?

B2 and B8 uses could be permitted within the parish with a notation in the supporting text to the policy that would restrict the use of HGVs within such uses subject to justification in a planning application. Such uses within the local area tend to be local businesses and it is considered that to continue to accommodate small and medium size enterprises within the parish, such a policy would be overly restrictive and not based on sound planning reasons.

The desire to ensure high quality design of housing within the parish under Policy H1 is supported. The housing mix promoted in Policy H2 (ie the requirement to deliver a range of house types and tenures including

bungalows, sheltered accommodation, self-build and shared equity properties) is supported and should be designed to reflect current market requirements. The requirement for a “Ford specific dwelling mix” is considered too parochial given that the market from which occupiers of the proposed (at least) 1,545 dwellings will be from a far bigger catchment than Ford parish. The mix should be agreed following consultation with ADC and the parish council in the usual way during the pre-application and planning application process.

Policy H2 should also be amended to include a reference to viability in respect of the provision of up to 30% affordable housing. Developers should have the ability to undertake a Viability Assessment for agreement with ADC if it is considered that the provision of 30% affordable housing would be detrimental to the viability of residential proposals when taking into account any other planning application requirements such as infrastructure provision, planning contributions, Community Infrastructure Levy and other financial or spatial contributions such as Biodiversity Net Gain or nutrient mitigation.

Policy H5 is supported in that it seeks to focus on affordable housing for local people with a connection to Ford however, with a housing requirement of 1,545 dwellings, which could produce over 500 affordable homes and it is questionable whether there is such demand within the parish of Ford. It is acknowledged that under the final criterion of the policy, the parish council recognises that in the event that a local resident is not found, the occupancy will pass to the normal ADC allocation policy.

### **Proposed Allocation Changes**

In summary, the landowner proposes that the gap allocation as annotated on the proposals map be amended to allow the inclusion of residential and educational development which in itself can be designed to be fairly open in return for additional public open space and school fields. This would result in a slight relocation of the gap slightly further to the west straddling the boundary between Yapton and Ford parishes. This would come forward as part of proposals for a new housing development on the site.

The subject site (as detailed above) is located adjacent to the northern boundary of Yapton and, subject to the construction of The Landings, would be adjacent to new residential development and therefore would be an urban extension. The local gap would be re-provided within the phased proposed development on land owned by the landowner and therefore would be able to continue to undertake its principal function of preventing the coalescence of Yapton and Ford in this location.

### **Conclusions**

In general, the landowner is in support of the Ford Neighbourhood Plan and the policies therein, subject to the amendments proposed above.

An additional allocation for a school and some residential development in the currently delineated gap is proposed. The requirement for the school is following a request from West Sussex County Council.

Throughout the draft Neighbourhood Plan, reference is made to the fact that there are no shops, schools or community facilities within the parish and the proposal of a school would partly resolve this issue.

Following a review of the requirements for the airfield development, this will only provide a primary school and the subject site is for a 6-form entry or all through school which meets the latest requirements from West Sussex County Council.

As detailed above, the proposed allocation of this site for a new school and approximately 400 residential units (including land in Yapton Parish) would provide flexibility in the delivery of the airfield site which will require significant enabling works and infrastructure prior to the delivery of a meaningful number of homes on the site. Bringing forward a smaller site in the interim would assist with housing land supply which the district is currently below its required numbers.

The delivery of a school is following identified need from West Sussex County Council which would mean that that site is not developable for residential uses. However, both the school and residential development can be brought forward whilst maintaining an element of gap between Yapton and Ford.

We trust that these representations will be carefully considered, particularly following the positive reviews of the site in the various HELAA Assessments since 2018.

We would be pleased to meet with the Neighbourhood Plan Group/Parish Council to discuss the proposals in detail to ensure that the Neighbourhood Plan can be amended to reflect these representations.

I trust the above is self-explanatory and please do not hesitate to contact me if you have any queries.

Yours sincerely



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Enc: Location Plan

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