



## **Ford Neighbourhood Development Plan 2011-2031 Pre-submission**

**Pre-submission consultation 31<sup>st</sup> July to 8th September 2023  
Arun District Council (ADC) Reg.14 comments**

**The comments are reflective of comments from all departments of ADC as the Local Planning Authority.**

**The comments are to be approved by the Group Head of Planning or his nominated representative prior to submitting to The Parish Council before the end of the consultation period.**

**(Approved and emailed to Ford PC on 8<sup>th</sup> September 2023)**

The Council fully supports the community's initiative to produce a Neighbourhood Development Plan (NDP). Neighbourhood planning aims to give people greater ownership of plans and policies that affect their area. The government is clear that the intention of Neighbourhood Development Plans should be to set out policies on the development and use of land in a neighbourhood area and that the local planning authority has a duty to support (guide and assist) production of the plan.

The Council's duty at this stage is to assist the Ford Neighbourhood Plan Group in making sure the draft that is subsequently submitted to the Council is in a form that will allow the Examiner at a forthcoming examination to recommend that it goes ahead to referendum (if required). The comments are reflective of comments from all departments of Arun District Council.

### **ADC pre-submission comments**

The Council has outlined the areas where there may be some degree of divergence with national or local planning policy, in order to help the Parish in preparing justification for these departures.

Please note that comments below do not include Arun District Council's statement on whether or not the authority considers that the modifications contained in the modification proposal are so significant or substantial as to change the nature of the neighbourhood development plan which the modification proposal would modify. This is a requirement at Regulation 17 as part of the submission to examination when the submission proposal has been received. However, it is noted that the Parish Council considers the modifications are not so significant or substantial as to change the nature of the Plan so should only require an examination.

The following list is intended to be a guide on some key issues identified in the Plan but please note that these comments do not necessarily include spelling or grammatical errors:

Document Reference	Comment	Recommended action
Policy EH8: Light Pollution	The text ' <b>Submission Plan 47</b> ' is highlighted. What does this text refer to?	There is no reference to what 'Submission Plan 47' is or the evidence to support this requirement so this should be deleted from the policy.
Policy EE7: Sustainable Commercial Buildings	<p>The policy states 'All new commercial and employment development, where it would be appropriate, shall be designed to provide secure parking and storage of bicycles for customers and employees consistent with the relevant standards produced <b>by WSCC</b>'.</p> <p>What about Arun's parking SPD</p> <p>EE7.1 The <b>Arun DC Energy Efficiency and Fuel Poverty Strategy 2014-2019</b> actively..." Is this Out of date?</p>	<p>Add 'and ADC' at the end of the first sentence ... <i>relevant standards produced by WSCC and ADC.</i></p> <p>Check that what para. EE7.1 is referencing is the most current document.</p>
<p>Policy EH1: Protection of trees and hedgerows (para 1)</p> <p>Para 2</p> <p>Para 3</p> <p>Para 3</p>	<p>The previous wording provided more weight. Policy wording should be strengthened.</p> <p>The policy can be more reflective of the statutory BNG requirement from Nov 2023.</p> <p>Due to the nature of what this seems to be covering the laying part is not needed when dealing with retained.</p> <p>The note at the end is not suitable for policy.</p>	<p>The bold text should be added to strengthen the policy "damages ecological networks <b>should will be refused unless it can demonstrate....</b>"</p> <p>Add the bold text "...must be designed to incorporate <b>a measurable net increase in biodiversity within and around developments and to enhance...</b>"</p> <p>Remove the work laid. "should be <del>laid and</del>-filled out..."</p> <p>Remove from policy and add to the supporting text. (<del>Note: this policy may mean retention of non-native species, particularly mature/landscape/specimen examples</del>).</p>

<p>Para 4</p> <p>Paragraphs 8,9 &amp; 10) plus supporting para 1.2</p>	<p>Suggested amendment to text regarding timber/masonry boundaries.</p> <p>The new text is very confusing on what it is trying to achieve. There are too many topics being covered and this makes the policy unwieldy. Parts of the policy is not enforceable eg. <i>Long term maintenance provision (e.g. funded management company) shall be set up for hedge cutting, tree pollarding, leaf collection, annual safety inspections, remedial and replanting works.</i> <i>Overall Tree Canopy Cover (TCC), within the bounds of any new development of three or more dwellings, or commercial development of more than 100 sqm should be at least 30%.</i> What is the evidence for 30%?</p>	<p>boundaries: <b>Where...these only be..., if an external boundary."</b></p> <p>The original policy is about protection of trees and hedgerows but some of the new text is specification for new trees and hedgerows.</p> <p>It is recommended that the new policy text is amended or split into 2 policies and made clearer about the specification/standards required for new planting.</p>
<p>Foreword</p>	<p>Grammatical issues in the foreword paragraph</p>	<p>Reword the sentence "has not been finally granted...."</p>
<p>Policy EH3: Buildings and Structures of Character</p>	<p>The policy is missing 3 and 4 Northwood Cottages – it is acknowledged that whilst the Local List identifies that they are in Yapton a review of our mapping system identifies that they are located within the Ford Parish (ADC need to amend the Local List).</p> <p>It is not clear which of the Former RNAS Ford Buildings have been identified and I am unable to locate a map so that they can be identified. This is important so that the buildings can be assessed, but also for the implementation of the policy by our Development Management colleagues.</p> <p>The canal is mentioned in the supporting text under 'scheduled ancient monument' but no</p>	<p>Add in 3 and 4 Northwood Cottages to the non- designated asset list.</p> <p>Be more specific with regards to the RNAS Ford buildings and identify them.</p> <p>Add text to the policy regarding the canal that crosses the parish.</p>

	reference is made to the route of the canal within the policy. Are there other buildings which could be included, such as Wicks Farmhouse?	Determine whether other buildings should be included to the policy.
Policy EH3: Conserving and enhancing non-designated Heritage Assets	<b>Policy modified</b> This policy is titled as Policy EH3: Conserving and enhancing non-designated Heritage Assets on page 28 but in the table para. 2.9 shown as EH3 Buildings and structures of character.	The policy title needs to be consistent in the document, however, if using the amended policy title - Policy EH3: Conserving and enhancing non-designated Heritage Assets, then add a note in the supporting text of the policy with the NPPF definition for clarity to explain that it is an amended policy title which does not change the nature of the policy because a building or structure of character is a non-designated heritage asset
Policy SA1: Ford Airfield	With planning permission approved, the policy needs to be deleted.	The policy needs to be deleted.
Policy SA1:Ford Airfield	It is unclear why there are no references to the line of the former Portsmouth to Arundel canal within the policy. The canal crosses the site and is not currently included within the policy which is disappointing as it could become a positive design and landscape feature.	In accordance with the above recommendation the policy needs to be deleted.
Route of the former Portsmouth to Arundel canal	Whilst there is a policy in the ADC Local Plan 2018 regarding the canal, is there any opportunity for a more local specific policy which could be included in the NDP. For instance could it be used as a greenway which links up the strategic site and provides a key feature in the strategic allocation?	Consider the addition of a policy which refers to the route of the former Portsmouth to Arundel canal.
LC7:Contributions to new infrastructure and facilities	<b>NEW policy</b> This should be identified as a new policy in the table in para 2.9 but the recommendation is for it to be deleted.	It is recommended that the policy as written in its current form <b>should be DELETED</b> . The policy cannot place planning conditions of providing a community centre hub as a result of the new development specified at Policy SA1. The content can be included separately from the plan, for example in a separate section or in

		an appendix, community aspirations/priorities section. If the community wants to construct or rebuild community buildings such as a community centre or community-led housing, a Community Right to Build Order could be worth considering.
Policy LC7: Contributions to new infrastructure and facilities	LC7 As currently worded should be deleted – The Parish should be encouraged to consider drafting an alternative policy - supporting development where it encourages the provision of a community/hub facility in line with SA1. The supporting text can list the aspirations on what is desired and the standards sought.	Delete Policy LC7 and draft an alternative policy which supports the provision for community/hub facilities and supporting text with aspirations.
Policy H3: Windfall Sites	<b>Policy Modified</b>	In order for all the criteria to be applicable as per the first line of the policy then the one ‘ <b>and</b> ’ must be added at the end of the penultimate criteria.
Policy GA1: Footpath, bridlepath and cycle path network	<b>Policy modified</b> The policy title has been amended in 5.12 but the original policy title is still in the table in para 2.9 so that needs to be made consistent.	The final sentence has no evidence to support it and is not enforceable. What if the alterations being made was to a path that was not previously screened? It is recommended that the last sentence is deleted. <i>Alterations and enhancements to footpaths, footways, cycle paths and bridleways must ensure that they are adequately screened and fenced from existing properties.</i>
Policy GA1: Footpath, bridlepath and cycle path network	Should reference be made to support delivery of network of Active Travel Routes – Ford Road etc?	Consider the addition of text to the supporting information regarding proposed active travel routes along Ford Road.
Policy GA2: Parking and new development	This policy is listed as modified in the table in para. 2.9 but no changes have been identified in this version and the ‘made’ plan.	Clarity required as to whether this policy is modified?
Policy SP1: Spatial plan for the parish	Clarification should be included in the supporting text as to how the 1545 is made up. Is this an additional 45 to the SD8 1500 allocation.	Justification as to what the figure comprises eg the strategic development and windfall?

	<p>Are the parish intending to allocate any sites to help deliver their aspirations and assist with Arun's needs?</p>	<p>Should the text be amended, the policy should be listed as amended in the table rather than saved.</p>
<p>Policy LC6: Local Open Space</p>	<p>In the policy table, LC6 is listed as a saved policy: ie: they have been checked against the made plan and they should not be unchanged in any way not even one word.</p> <p>The policy has removed the heading 'Schedule A' and the following wording has been added 'Football pitches at 'Arun Sports Arena Football pitches used by the sports centre. An important local asset.' As this is different to the made policy, it should be recognised as an amended policy.</p>	<p>Change the policy from saved to amended in the policy list.</p>
<p>Proposal Map</p>	<p>The Proposals Map should say Policies map and is on page 46 not page 53 as shown in contents list.</p> <p>Burdell Road should be deleted from the proposal map as it has been completed incl ref to Policy SA2</p>	<p>Amend title name and page number in contents.</p> <p>Remove Burdell Road from proposal map</p>
<p>Policy EH5: Grade 1,2 and 3a Agricultural land</p>	<p>Policy EH5 is not consistent with the Arun Local Plan. It does not allow ANY development on grade 1, 2 and 3a land.</p>	<p>The policies should be consistent with each other. It is recommended the following sentence is added to the policy '<b><i>unless need for the development outweighs the need to protect such land in the long term</i></b>', which is consistent with the wording of SO DM1 in the Plan.</p>
<p>Policy H2: Housing mix</p>	<p>If there are no housing allocations proposed in the Neighbourhood Plan, the policy should be deleted.</p>	<p>It is recommended the policy is deleted.</p>
<p>Policy EH7: Local Gap</p>	<p>There is a preferred site for the secondary school and this policy should be amended to allow the delivery of this infrastructure. In its current form, we would be unable to support it.</p>	<p>The policy should be amended to allow the delivery of a secondary school.</p>

	An allocation for a secondary school should be included within the plan on the basis that it would provide the necessary infrastructure to support allocations in the Local Plan and the Ford NP.	An additional policy should be added to allow for an allocation of a secondary school within the parish.
--	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------

<b>Additional comments</b>
For completeness, it is recommended that a map is included to show the non-designated heritage assets. This can be done as an appendix if it is easier.
The review of the NDP offers the opportunity to review the non-designated heritage assets within the parish. However, it is not clear if this has been undertaken and there does not appear to be any evidence to confirm this. Please clarify this.
The BUAB isn't very clear – and appears to exclude land shown on the Arun LP policies map: Ford Prison; and now built out resi land East of Industrial Estate; BUAB should clarify excludes Greenspace at Rodney Crescent.
Policies map legend could be clearer by using different colours – some are almost the same

**Arun District Council supports the plan and the fundamentals of the policies drafted but our comments highlight potential issues and potential conformity issues which we deem may require necessary action. It does not purport to decide on whether the plan meets the basic conditions, that is for the independent examiner to decide in the first instance.**

### **Conclusion**

The Council has made the suggestions in this document in the spirit of facilitating the draft plan's progress to adoption, and they should not be taken as the District Council requiring or requesting changes to the document, as ultimately any decisions over the eventual contents and whether to take comments on board rest with the Ford Neighbourhood Plan Group. The Council fully supports the community's initiative to review the Neighbourhood Development Plan and welcome any further discussions on the comments made.

## **DELEGATED AUTHORITY: NEIGHBOURHOOD DEVELOPMENT PLANS**

The Neighbourhood Planning (General) Regulations 2012 - Parts 5 and 6

### **Background:**

Arun's constitution sets out how the Council operates, how decisions are made and the procedures that are followed; to ensure that decisions are efficient, transparent and accountable to local people. A key priority of the Council is to implement the recently adopted Local Plan in order to appropriately guide and manage growth across the District. Recent changes to the plan making system include the

introduction of the Localism Act, which also makes provision for Neighbourhood Development Planning. To reflect the changes to the plan making system, and to clarify the roles of committees, alterations were made to the constitution in relation to Neighbourhood Development Planning functions for reasons of expediency.

**Current delegated Authority as set out in the Constitution:**

**Under Part 4- Officer Scheme of Delegation, Section 3 paragraph 3.1.1 and Group Head of Planning matrix of legislation for the Group Head of Planning.**

**Exercise of delegated authority by the Group Head of Planning:**

In accordance with the above, the Group Head of Planning or his nominated representative hereby authorises:

**Comments on Ford Neighbourhood Development Plan 2 2011-2031:  
Pre-submission Plan**

**Signed:**

.....  
**Group Head of Planning**

**Date: 8<sup>th</sup> September 2023**