

John Slater Planning Ltd

Ford Parish Council Neighbourhood Development Plan 2017 - 2031

Submission Version

A Report to Arun District Council on the Examination of the Ford Parish
Council Neighbourhood Development Plan 2017-2031

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Executive Summary

My examination has concluded that the Ford Neighbourhood Plan should proceed to referendum subject to the Plan being amended in line with my recommended modifications which are set out in full in my report, which are required to ensure the plan meets the basic conditions. The more noteworthy include –

- That the boundary to the designated Ford Airfield master plan area should be consistent with the boundaries of the strategic development area shown as SD8 on the Local Plan Proposals Map.
- That the Built-Up Area Boundary should be shown on the Proposals Map and should follow the same alignment as shown on the Local Plan Proposals Map which include HMP Ford, properties on the east side of Ford Road and the industrial areas up to the Parish boundary.
- That the policies relating to waste facilities be deleted from the plan, as they constitute “excluded development”.
- That the policy for Ford Airfield should require compliance with all the specific local plan policies for the site and should not repeat or undermine these policies but I have recommended the inclusion of the complementary policies and proposals for matters which are not covered by local plan policy.
- That the neighbourhood plan policy relating to the Biodiversity Opportunity Area be deleted.
- Correcting the error that included the southern section of the local gap which has now been developed for housing.
- Deleting the two proposed Local Green Space designations on the basis that they have not been evidenced as meeting the requirements set out in national guidance.
- Removing reference to a Ford specific dwelling mix.
- Changing elements of the windfall site policy.
- Removing reference to the need for a local connection in the affordable housing allocation policy.

Introduction

Neighbourhood planning is a process, introduced by the Localism Act 2011, which allows local communities to create the policies which will shape the places where they live and work. The Neighbourhood Plan provides the community with the opportunity to allocate land for particular purposes and to prepare the policies which will be used in the determination of planning applications in their area. Once a neighbourhood plan is made, it will form part of the statutory development plan alongside the Arun Local Plan 2011- 2031, West Sussex Minerals Local Plan and the West Sussex Waste Local Plan. Decision makers are required to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.

The neighbourhood plan making process has been led by Ford Parish Council. A Steering Group was appointed to undertake the plan's preparation. Ford Parish Council is a "qualifying body" under the Neighbourhood Planning legislation.

This report is the outcome of my examination of the Submission Version of the Ford Neighbourhood Plan. My report will make recommendations based on my findings on whether the Plan should go forward to a referendum. If the plan then receives the support of over 50% of those voting at the referendum, the Plan will be "made" by Arun District Council, the Local Planning Authority (LPA) for the neighbourhood plan area.

For ease of writing, I will throughout the report refer to the plan as the Ford Neighbourhood Plan rather than its full title of Ford Parish Council Neighbourhood Development Plan.

The Examiner's Role

I was formally appointed by Arun District Council in July 2016, with the agreement of Ford Parish Council, to conduct this examination. My role is known as an Independent Examiner.

In order for me to be appointed to this role, I am required to be appropriately experienced and qualified. I have over 40 years' experience as a planning practitioner, primarily working in local government, which included 8 years as a Head of Planning at a large unitary authority on the south coast, but latterly as an independent planning consultant. I am a Chartered Town Planner and a member of the Royal Town Planning Institute. I am independent of both Arun District Council, and Ford Parish Council and I can confirm that I have no interest in any land that is affected by the Neighbourhood Plan.

Under the terms of the neighbourhood planning legislation I am required to make one of three possible recommendations:

- That the plan should proceed to referendum on the basis that it meets all the legal requirements.
- That the plan should proceed to referendum if modified
- That the plan should not proceed to referendum on the basis that it does not meet all the legal requirements.

Furthermore, if I am to conclude that the Plan should proceed to referendum I need to consider whether the area covered by the referendum should extend beyond the boundaries of area covered by the Ford Neighbourhood Plan area.

In examining the Plan, the Independent Examiner is expected to address the following questions:

- a. Do the policies relate to the development and use of land for a Designated Neighbourhood Plan area in accordance with Section 38A of the Planning and Compulsory Purchase Act 2004?
- b. Does the Neighbourhood Plan meet the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 namely that it specifies the period to which it is to have effect? It must not relate to matters which are referred to as “excluded development” and also that it must not cover more than one Neighbourhood Plan area.
- c. Has the Neighbourhood Plan been prepared for an area designated under Section 61G of the Localism Act and has been developed and submitted by a qualifying body.

I am able to confirm that the Plan, if modified in accordance with my recommendations, does relate to the development and use of land, covering the area designated by Arun District Council, for the Ford Neighbourhood Plan on 6th December 2013.

I can also confirm that it does specify the period over which the plan has effect namely the period from 2017 up to 2036.

I can confirm that the plan, if modified in line with my recommendations, will no longer cover any “excluded development”.

There are no other neighbourhood plans covering the area covered by the Plan designation.

Ford Parish Council as a parish council, is a “qualifying body” (QB) under the terms of the legislation.

The Examination Process

The presumption is that the neighbourhood plan will proceed by way of an examination of written evidence only. However, the Examiner can ask for a public hearing in order to hear oral evidence on matters which he or she wishes to explore further or if a person has a fair chance to put a case.

I am required to give reasons for each of my recommendations and also provide a summary of my main conclusions.

Although I was initially appointed to conduct the examination in 2016, the plan was not at that time submitted under Regulation 15. That was done in June 2017 and following the Regulation 16 consultation, I received the examination documents on 17th August 2017.

I carried out an unaccompanied visit to Ford and the surrounding areas, and the adjacent countryside on 7th September 2017. I spent over three hours driving and walking around the area. From my initial consideration of the plan documents and the Regulation 16 representations, it was immediately clear to me that there was a close relationship between the emerging local plan and the neighbourhood plan. The Ford NP had been prepared in the context of the emerging Local Plan, as the adopted Local Plan was very out of date. I will address my decision to suspend the examination of this neighbourhood plan until after the Local Plan Inspector had issued his report, in the Plan Overview section of this report. I did however have a number of other questions and matters I wished to raise with the Parish Council arising from my site visit and my initial consideration of the documentation, which I set out in the same note, where I had indicated my intention to suspend the examination until after the publication of the Local Plan Inspector's report. This was in a document entitled "Initial Comments of the Independent Examiner" which I issued on 14th September 2017. I received a response from the Parish Council on 31st October 2017.

On 6th July 2018 I was advised by the District Council that the Inspector's report had been received and that it was intended to adopt the Local Plan at the forthcoming Full Council meeting to be held on 18th July 2018. I therefore resumed my examination on the basis that there was now a specific Local Plan allocation for the major residential development at Ford Airfield. As a result of my writing of the report, I raised the issue of the discrepancy between the map of the Built-Up Area boundary, shown on the plan provided to me by the Parish Council and the boundary in the Local Plan. I received a response to that question on 18th July 2018, which I address elsewhere in this report. I also questioned the inclusion of the southern

section of the proposed Local Gap, which appeared to be now developed for new housing. The Parish Council confirmed that the area had been included in error. As a result of considering these responses I conducted a second visit to the Plan area on 19th July 2018.

The Consultation Process

The Parish Council sought designation as a neighbourhood area in 2013. It had previously decided to prepare a parish plan. A neighbourhood plan team was formed comprising parish councillors and residents. Part of the drive was to seek greater control over development planned in the locality, which had, in part, stemmed from the previous proposals for an eco-town on the airfield site and it was at that time facing proposals for a waste incinerator on part of the airfield site. It wished to avoid piecemeal development.

A survey was circulated in 2012 and 2014 to understand from the residents to ascertain what they as a community valued. This was followed by an Open Event held in 2014. Early on in the process, the group decided to engage with the planning consultants acting for the airfield's landowners to try and develop master plan. Following successful engagement, it was agreed to seek the community's endorsement through a public meeting held in February 2015 which are shown as scheme for between 650 and 700 houses. Following the suspension of the local plan examination, the neighbourhood plan group decided to consult the community on a higher housing number for Ford. This was shown on a new plan which showed 1500 dwellings and this was considered by the parish in November 2015 and according to the Consultation Statement "the vote proved narrowly in favour of working towards 1500 homes on the sites identified in the display maps". The proposals were brought together in a Pre- Submission version of the plan which was then the subject of a Regulation 14 Consultation which ran for six weeks between 3 May 2016 and 14 June 2016. The results of the consultation are set out in a table which is available as part of the neighbourhood plans evidence base, which also show how the plan was amended as a result of the representations received.

Regulation 16 Consultation

I have had regard, in carrying out this examination, to all the comments made during the period of final consultation, which took place over a 6-week period between 21st June 2017 and 4th August 2017. This consultation was organised by Arun District

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Council, prior to it being passed to me for its examination. That stage is known as the Regulation 16 Consultation.

In total 21 individual responses were received from organisations namely, Natural England, Arun District Council, Highways England, Environment Agency, Gladman Developments Ltd, West Sussex County Council, Historic England, Southern Water, South Downs National Park Authority, HMP Ford, Arundel Town Council, Yapton Parish Council, Walberton Parish Council and Clymping Parish Council, Arun and Chichester District Bridleway Group, planning consultants Barton Wilmore on behalf of Redrow Homes and Wates Development, Lichfields on behalf on the Barnham, Eastergate and Westergate Southern Consortium, Phoenix Planning Consultancy on behalf of Keith and John Langmead and Savills on behalf of on behalf of the Baird family. I also received letters from the waste operators Grunden Waste Management Ltd and Viridor Waste Management Ltd. In addition, responses were received from 7 local residents of Ford Parish and 40 letters from residents from outside the Parish, the majority being residents of Clymping and many using a standard piece of correspondence.

I have carefully read all the correspondence and I will refer to the representations where it is relevant to my considerations and conclusions in respect of specific policies or the plan as a whole.

The Basic Conditions

The Neighbourhood Planning Examination process is different to a Local Plan Examination, in that the test is not one of “soundness”. The Neighbourhood Plan is tested against what is known as the Basic Conditions which are set down in legislation. It will be against these criteria that my examination must focus.

The six questions which constitute the basic conditions test seek to establish that the Neighbourhood Plan: -

- Has had regard to the national policies and advice contained in the guidance issued by the Secretary of State and it is appropriate to make the Plan?
- Will the making of the Plan contribute to the achievement of sustainable development?
- Will the making of the Plan be in general conformity with the strategic policies set out in the Development Plan for the area?
- The making of the Plan does not breach or is otherwise incompatible with EU obligations or human rights legislation?

- Whether prescribed conditions are met and prescribed matters have been complied with?
- Whether the making of the Plan will have a significant effect upon a European site or a European offshore marine site, either alone or in combination with other plans and projects?

During the final stages of this examination the Government issued a revised National Planning Policy Framework. However, in accordance with the stipulation of Paragraph 214 of the 2018 NPPF, this examination has been carried out applying the policies in the 2012 version of the Framework.

Compliance with the Development Plan

To meet the basic conditions test, the Neighbourhood Plan is required to be in general conformity with the strategic policies of the Development Plan, which following its adoption on 18th July 2018, is now the Arun Local Plan 2011 – 2031. In addition, the development plan incorporates the West Sussex Minerals Local Plan adopted in 2003, and the West Sussex Waste Local Plan, adopted in April 2014 which allocates a strategic waste facility on the airfield in the position of which is shown, for information, on the Local Plan Proposals Map, and is excluded by the site covered by Policy SA 1.

Ford Airfield is identified as a strategic location for new housing development – shown as SD8 in the new Local Plan, which is expected to deliver a minimum of 1500 new dwellings. The Plan identifies a built-up area boundary. It also designates a Biodiversity Opportunity Area to the east and the north of the plan area. It also identifies a number of open spaces as areas to be protected by policy OSR DM1. Many are also identified in the neighbourhood plan and are covered by Policy LC6 but there are a couple of other areas which the neighbourhood plan also identifies. The Proposals Map also identifies and protects the indicative road line to link the new development area at Ford Lane and the main road to Arundel which will bridge the railway line, and is covered by Policy T SP3.

I have dealt with the relationship between the neighbourhood plan and the Local Plan at length elsewhere in this report and subject to my recommendations I can confirm that this element of basic condition is met.

Compliance with European and Human Rights Legislation

An SEA Screening Report was submitted to the District Council on 3rd June 2015. Arun District Council issued a screening opinion on 13th July 2013 which concluded

that it was likely that there would be significant effect arising from the Plan and a full Strategic Environmental Assessment (SEA), as required by EU Directive 2001/42/EC, which is enshrined into UK law by the “Environmental Assessment of Plans and Programmes Regulations 2004”, would be required.

The Qualifying Body submitted a Scoping Report on 25th November 2015 and a Scoping Opinion was issued by the LPA on 20th January 2016, having consulted the 3 statutory bodies.

The Submission Documents include a Strategic Environmental Assessment, dated May 2017.

The District Council, as competent authority, also issued a screening opinion under the Habitat Regulations. The assessment concluded that the Plan will not likely have any significant effects on any internationally protected wildlife sites, the nearest of which is Pagham Harbour which is a Special Protection Area, a Site of Special Scientific Interest, a Ramsar site and a Marine Conservation area.

I am satisfied that the basic conditions regarding compliance with European legislation are met. I am also content that the plan has no conflict with the Human Rights Act.

The Neighbourhood Plan: An Overview

Background to the Plan

Ford is a somewhat unusual parish in that, in terms of its site area, it is dominated by a former airfield, which is now home to a popular market, as well as an open prison and a number of industrial estates, including waste processing operations. The airfield is predominantly an area of open land which lies between the existing communities of Yapton and Climping on the west banks of the River Arun. The neighbourhood area does not have a particularly coherent settlement pattern, with a relatively modern housing estate, that feels like a natural extension to the residential development within Yapton to the west and limited housing development immediately to the north of the prison and also along Ford Lane. Rather unusually, the parish does contain a mainline railway station. Over the last decade or so there have been attempts to promote major residential development at Ford Airfield. Initially proposals were advanced for it to be designated as an eco - town. Whilst that particular proposal was dropped, the interest in pursuing major housing development did not disappear and there was a growing realisation that the airfield site had potential for a major housing development, which could contribute to meeting the housing needs of both Arun and also other areas in West Sussex. I understand that the local community felt that the eco-town was being imposed on them, as well as facing some major waste proposals and the Parish Council resolved relatively early on to prepare a neighbourhood plan to be able to influence development, seeking designation in late 2013. At that time, the draft local plan was not promoting Ford as

a major development location. The first version of the local plan proposing allocating Ford as a location for housing growth, was published in October 2014. The neighbourhood plan group made a conscious decision early on to seek to engage with the landowners, to try and influence the form of this major housing scheme so that it incorporated elements which have been identified by local residents that they wish to see, including improved community facilities and creating a new heart to the parish. In its initial stages of the local plan was suggesting 650–700 new homes, but later iterations of the local plan increased that number to 1500.

Relationship between the Neighbourhood Plan and the Arun Local Plan

The emerging Arun Local Plan has had a somewhat protracted journey to its recent adoption, with the Local Plan Inspector suspending the early stages of the examination in order to seek a significant increase in housing numbers, to properly reflect objectively assessed housing needs. This resulted in a revised version of the plan and the Hearing was reconvened a matter of days from when I conducted my site visit. This would include specific hearing sessions which in one discussion looking at the proposed housing allocation at Ford as well as considering overall housing numbers. At that stage, there were still a number of unresolved objections to the Ford allocation.

Equally I was faced with a significant number of Regulation 16 representations that pointed out that the allocation of 1500 new houses in open countryside was a strategic matter that ought to be resolved by the local plan examination. In terms of my examination of the neighbourhood plan, I am required to have regard to the question of whether the plan is in general conformity with strategic policies of the development plan. I would therefore have been faced with judging the proposed strategic housing allocation against the provisions of then adopted local plan, which was the Arun Local Plan 2003, which did not identify Ford as strategic growth point, did not have a built-up area boundary and the relevant development management policy GEN3 was be focused on protecting the countryside. If my examination had progressed when initially submitted, it would have looked at the plan against these *adopted* local plan policies rather than the provisions of the *emerging* local plan, which had not at that time been examined and the Inspectors recommendations known. I would have had to test the plan against the reasoning and evidence supporting the emerging Local Plan. This would have needed to examine, for example, the strategic transport implications of this scale of development, in this location and also the adequacy of other related infrastructure. Similarly, without the overarching context of an up to date adopted local plan, I would have needed to be satisfied that the proposal would deliver sustainable development and that the policies were based on robust evidence. All this activity would have duplicated the matters that would have been part of the local plan examination running concurrently, incurring time and cost to all parties involved. Equally I am required, if the recommendation is that the plan moves to referendum, to consider whether the referendum area needs to be extended. Planning Practice Guidance states that the

area can be extended “where the scale or nature of the proposals are such that they will have a substantial, direct and demonstrable impact beyond the neighbourhood area” In this case, it would have been very likely that I would have had to recommend the referendum area be extended into Yapton and Climping parishes, which could have potentially affected the referendum results. Now that the proposal accords with the adopted Local Plan, that will not now be necessary, as the neighbourhood plan’s main proposals are consistent with policies already part of the development plan.

Consequently, I took the decision to suspend my examination until the Local Plan Inspectors report had been published. I set out my reasoning in my Initial Comments document dated 14 September 2017. The Parish Council, in their response, drew to my attention the Inspector’s interim conclusions and requested I reconsider my position. I did reflect on the matter but my view was not altered and I maintain that, in light of the local plan’s recent adoption, that was a sound decision. The current position is that the Inspector’s report was published on 4th July 2018 and Arun District Council formally adopted the local plan on 18th July 2018. It is therefore against the provisions of this newly adopted plan that the basic condition test is now applied, which includes the strategic allocation of at least 1500 dwellings in Ford Parish. The adopted plan, in accordance with the Inspector’s recommendations has drawn a built-up area boundary which includes parts of the parish and importantly includes now Ford prison and adjacent industrial estates.

It is a fundamental requirement that a neighbourhood plan cannot promote less development than provided for in a local plan. I am aware from recent correspondence from the Parish Council that they are concerned that the local plan extended the built-up area to include the prison and adjacent industrial areas. They told me:

“The Parish Council has not been consulted or made aware by ADC that they had included a settlement boundary in the Local Plan and are not happy with it as drawn. The LPA have been aware of the boundary drawn in the NP for a considerable amount of time. The new boundary appears to have been added to the Local Plan as late as June 2018. ADC Policy SD SP2 makes it clear that development should be focused within the BUAB.”

It is not my role as a neighbourhood plan examiner to question what is included in the Local Plan. I have to deal with the Local Plan as it has been adopted and it would be inappropriate for a neighbourhood plan to propose a different and smaller settlement boundary, which could result in less development than is set out in the local plan. The new Local Plan does include a strategic policy, Policy SD SP2 which allows neighbourhood plans to alter settlement boundaries- “providing these do not reduce the coverage of a Built-Up Area Boundary”. The Parish Council would wish the neighbourhood plan to exclude the prison land and the industrial estates from the built-up areas. However, these are already built up areas and not only is it

procedurally right that they be retained, but I believe that in policy terms they should be treated as developed sites.

Consistency between Neighbourhood and Local Plan designations

Close comparison between the Local Plan and the Neighbourhood Plan's Proposal's Maps reveal that some discrepancies between the areas shown in the in terms of the master plan/ strategic development area and also the areas designated as Biodiversity Opportunity Area. I have concluded that the Local Plan boundaries are likely to be a more accurate representation and it would be inappropriate for the two parts of the development plan to have different boundaries for the same designation, unless there is a specific reason to diverge, which I have not been appraised of.

Excluded Development

Another area where I had make significant changes is where the planned deals with waste development which falls within the definition of "excluded development". The legislation makes it clear that policies related to what is a county matter cannot be included in a neighbourhood plan. If this plan is to pass the basic conditions, all policies relating to waste operations must be deleted from the plan.

Other Matters

There will need to be adjustments made to the supporting text of the policies where I have made recommendations, which are matters beyond my remit as an examiner, but it is important that the final neighbourhood plan reads as a coherent planning document. I would urge the Parish Council and the Planning Department to discuss the changes required in any supporting text to ensure that they reflect the recommendations and changes to the policy wording. This can also take on board revised wording and layout changes suggested by the LPA to the non-policy part of the Plan document.

The Neighbourhood Plan Policies

Policy SP1 – Spatial Plan for the Parish

This policy is in accordance with the adopted Local Plan Policy H SP2 which is the generic policy dealing with all the Strategic Site Allocations and in particular SD8 which deals specifically with the Ford Strategic Allocation and also Policy SD SP2 which states that development will be focused within the Built-Up Area Boundary subject to compliance with other policies. As a housing figure is expressed as a minimum number that indicates that the plan is planning positively for new housing. In order to give clarity to decision makers, I will make it clear that the built-up area boundary is the boundary that is shown on the Arun Local Plan Proposals Map.

Recommendations

Define the Built-Up Area Boundary on an enlarged Proposals Map with the line consistent with the Built-Up Area Boundary shown on the Proposals Map of the Arun Local Plan, except where the boundary extends into the adjacent parish in which case the boundary should follow the plan area boundary.

Amend the Ford Airfield Site Boundary shown as Policy SA1 Masterplan to follow the same delineated line as identified as allocation SP 8 shown on the Proposals Map of the Arun Local Plan.

Amend the policy wording as follows. At the end of the first sentence, replace “in Policy BUA1” by “on the Proposals Map”.

In the second sentence “as shown as Policy SA1” and insert at the end of the sentence “as required by Policy H SP2 of the Arun Local Plan”.

Policy BUA1- Built-up Area Boundary.

The neighbourhood plan proposes that the built-up area boundary should coincide with what is defined on the Proposals Map as the Master Plan site and includes the housing site in Burndell Road shown also in red – I assume that the former is the area envisaged as being covered by allocation SD8 in the Local Plan (SA1 in the neighbourhood plan) although there are some discrepancies in the actual boundaries used. At my request, the Parish Council sent me a separate BUA map, but that excludes the houses on the east side of Ford Road north of the prison, as well as some of the industrial areas and the prison itself. As previously mentioned, I do not consider that the neighbourhood plan would be consistent with the strategic development plan policy if it proposes to have a smaller built up area than is shown on the adopted local plan. This now includes the HMP Ford and the industrial units of the Rudford Industrial Estate which fall within the parish. I have no evidence or seen any suggestion that these existing uses will not continue for the lifetime of the plan, but it must be recognised that these areas are developed and do not form part of the areas where countryside policies should prevail.

The only area where the built-up area does not coincide is where the built-up area boundary goes into the adjoining parish in which case the boundary will then need to follow the parish/neighbourhood area boundary.

Another mapping discrepancy ~~between~~ is northern line of the SD8 area / masterplan where on the local plan, the boundary extends to the southern boundary of the property is shown as “Conifers”, wherein it is further to the south on the neighbourhood plan as submitted.

I consider that it is relevant for the built-up area boundary and indeed other designations, which rely upon policies in the Local Plan to form the basis for the neighbourhood plan should be shown on the Proposals Map, but it is important that

there is absolutely no difference between the boundaries between the two plans and it may be helpful for the Proposals Maps to be produced at a larger scale, perhaps filling a full A4 page. It may be that the Arun Planning Department could offer mapping assistance to the Parish Council in transposing the local plan boundaries on to the neighbourhood plan mapping base.

The list of acceptable uses in the second part of the policy is more limited than is allowed by Local Plan Policy C SP1. I can deal with this by changing the final bullet point to refer to “the development plan” rather than “this Plan”.

Recommendations in the first sentence delete “as the Master Plan site”.

In the final bullet point replace “this” with “the Development”

Policy BUA2 - New Infrastructure Development.

There is a fundamental issue with this policy in that, by virtue of the provisions of Section 38B of the Town and Country Planning Act 1990, as amended by Schedule 9 of the Localism Act 2011 a neighbourhood development plan “may not include provisions about development that is excluded development”. That would include the purposes which are set out in Paragraph 1(i)(j) of Schedule 1 of the Town and Country Planning Act 1990 which covers development “for the purposes of recovering, treating, processing, sorting, transferring or depositing of waste”. The three areas allocated in the Proposals Map would fall squarely within the definition. It is legally not possible for the plan to stipulate how planning applications covering development on these sites should be addressed. There is no reason why the issue cannot be moved to a community aspiration as an expression of local opinion, but it cannot be a development plan policy. I must recommend that the policy be deleted as it does not meet the basic conditions.

Recommendation

That the policy be deleted.

Policy SA1 - Ford Airfield

In many respects, this policy covers much the same ground as set out specifically in Policy SD8 of the Arun Local Plan, which deals in detail with the proposed strategic allocation at Ford in conjunction with the overarching Policy H SP2 which covers the design and masterplanning of all the strategic site allocations. The role of the neighbourhood plan should be to support the strategic policies in the local plan and I consider these two policies are strategic policies. The PPG states that the objective should be to have complimentary neighbourhood and local plans and to minimise conflict between the two. As the aspirations of the two policies are broadly similar and the neighbourhood plan upholds and supports the principles set out in local plan, I believe there is room for the two policies to be complimentary.

complementary. There is specific Secretary of State advice that allows a neighbourhood plan to cover strategic allocation sites so long as it provides an additional level of detail and/or a distinct local approach to that set out in strategic policy, without undermining that policy. I see no value in the neighbourhood plan either repeating, or covering the same matters, that are already established in the local plan for this allocation site, but at the same time, I recognise the local community's desire to shape the development so as to meet its vision for this important development, which will be taking place within the parish. I therefore propose to recommend that rather than having this written as a standalone policy, the policy should build on the local plan policies and introduce other matters or give a local perspective, relating to what the neighbourhood plan is promoting, subject to compliance with the basic conditions. My recommendation will make reference to the proposals for the site having to comply with the policies as set out in the local plan Policies H SP2 and SD8 and in addition, the development should – ensure that the layout of routes and open spaces should provide a sense of orientation, as well as a sense of place.– the community hub should include a community hall.– the development should incorporate accommodation for the elderly.–the healthcare facilities should be provided on site, as part of the development rather than via a financial contribution to be provided elsewhere.–the network of open spaces should include parks and gardens, natural and semi natural green space, amenity space (including village greens), children and young persons' play spaces and allotments, all connected via a network of footpaths and cycleways which will link the community to the new facilities.– retain mature vegetation, where possible.– deliver road improvements, as necessary to Ford Lane, Horsemere Green Lane and Yapton Road subject to detailed assessment. I believe that all the other requirements set out in Policy SA1 are already adequately covered, and in some cases in more detail, by the existing local plan policy covering the site. If the neighbourhood plan had sought to supersede the local plan proposals, then some important requirements to be imposed on the development, would have been omitted, such as the links between development and Ford Railway station and the Littlehampton to Arundel Cycleway. However, there are some elements where ~~are~~ my revised wording does not fully reflect what the policy has put forward. I will explain my reasoning as follows. This strategic allocation is required to contribute to meeting the objectively assessed needs for housing across all of Arun and the surrounding districts and the affordable housing mix of tenures should not just be based on the parish's needs. That would not meet the basic conditions test relating to compliance with the strategic development plan policies. In terms of housing tenure, the proposal includes the provision of starter homes as part of the affordable housing element. Under the 2012 NPPF this did not recognise that starter homes fell within the affordable housing component. That has changed with the recently published NPPF and whilst in accordance with definition of affordable housing in the new NPPF, this plan is required to be assessed against the original NPPF. I do not consider that it is necessary for me to recommend a change to remove starter homes as a form of affordable housing. I applaud the intention

behind the requirement to engage the local community in the detailed design of the master plan. The development of a master plan is a stage before the detailed design scheme. I consider that such community engagement with the master plan to be hugely beneficial but it cannot be an absolute requirement, which is implied about the use of “will”. The 2012 NPPF in paragraph 189 states that the LPA should “encourage any applicant who are not already required by law, to engage with the local community before submitting their application”. My experience is that such engagement invariably improves a scheme but the wording is “should” not “must” and it would not be tenable to refuse an otherwise acceptable scheme, purely due to the absence of a community engagement strategy. I will therefore be recommending the amendment of the wording to reflect that.

Recommendation Replace the existing policy with:

“The area shown on the Proposals Map as SA1 shall be developed in a comprehensive and coherent manner in accordance with all the policies set out in the Arun Local Plan and in particular Policy HSP2 and Policy SD8. In addition to meeting these requirements, the master plan will be expected to: –

- ***provide that the layout of pedestrian footways, cycleways roads should provide a sense of orientation as well as a sense of place.***
- ***local areas for play shall include areas designed as “village greens” as well as sports pitches***
- ***the proposed community hub shall include the provision of a community hall.***
- ***the mix of residential units shall include accommodation for the elderly.***
- ***the new healthcare facilities shall be provided on site as part of development rather than the development being expected to make a financial contribution to healthcare facilities elsewhere.***
- ***the master plan shall incorporate a network of open spaces, which shall include parks and gardens, natural and semi-natural green space, amenity space (including village greens), sports pitches, children and young persons’ play spaces and allotments, all connected via a network of footpath and cycleways that will link the new and existing community to new facilities.***
- ***existing mature vegetation shall be retained where possible.***
- ***where required, following detailed highway assessment, the development will deliver any required road improvements to Ford Lane, or Horsemere Green Lane and Yapton Road.***

The design of the detailed master plan should be prepared following community engagement through workshops with the local community and stakeholders. Part or all of the development and associated infrastructure maybe delivered through a community land trust”.

Policy SA2 - Burndell Road

I initially questioned the need for the allocation, based on the fact that planning permission has already been granted for 45 homes on the site. I was advised that the consent has not been implemented and an alternative consent could be sought. I accept that justification, but in that case, I do not consider that the policy is required to quote the application number of the existing consent, which may in time, lapse. Again, my previous comments regarding a community engagement strategy are relevant to this policy as well as Ford Airfield. My comments regarding affordable housing to meet parish needs equally apply to this policy.

Recommendations

In the first sentence remove “this is the subject of planning application reference F/7/15/OUT”.

In the final paragraph, replace “will” by “should” and delete the remainder of the sentence after “stakeholders”.

Policy EH1- Protection of trees and hedgerows

This policy seeks to “resist” development which damages or results in the loss of trees of arboricultural value or amenity value or results in the loss of hedgerows and/or priority habitats or which significantly damages ecological networks”. I understand that the aspiration but I am not clear how a decision maker would “resist”, as the decision is to whether consent is granted or refused. To get the clarity which is expected of a planning policy, I will adopt wording used in paragraph 118 (fifth bullet point) of the 2012 NPPF, specifically that permission will be refused “unless the need for, and the benefits of the development in that location clearly outweigh the loss.”

In terms of the final requirement of the policy, the requirement to have to submit a tree survey should only apply on sites where there are trees on the site or on adjacent land.

Recommendations

In the first sentence replace “resisted” with “refused unless the need for, and the benefits of the development in that location clearly outweigh the loss”.

In the final paragraph, insert after “Proposals” the following “where there are trees on the site or on neighbouring sites that could be affected by the development”.

Policy EH2 - Renewable Energy

The primary issue with this policy is that it seeks to prevent developments on Grade 1 and 2 agricultural land, but also on any land in agricultural production, irrespective of its location. Paragraph 112 of the 2012 NPPF looks to protect the best and most versatile agricultural land and its approach is also to seek to use poorer quality land in preference to land of higher quality. I therefore proposed to remove the reference to the land “being in agricultural production”. The acceptability of a policy cannot be dependent upon the operational decisions of an individual farmer. This could lead to a farming operation taking land out of production, prior to submitting applications or energy production.

Recommendation

In the final bullet point delete “on land in agricultural production or”.

Policy EH3 - Buildings and Structures of Character

These four properties are already designated as non-designated heritage assets. I consider the policy is essentially in line with the paragraph 135 of the 2012 NPPF, but I will make it clear that it is harm or loss “to their significance” that is the matter to be balanced by the decision maker when considering a planning application affecting these heritage assets. There is also a duplication of the use of “retain their local distinctiveness”, which is a typographical error.

Recommendations

In the second sentence of the second paragraph insert after “harm” the following “to their significance”.

In the first sentence of the second paragraph remove the second “retain their local distinctiveness”.

Policy EH4 - Surface Water Management

This policy relates to all development. Some forms of development will not have implications in terms of surface water disposal. Equally, not all developments will be required to submit Flood Risk Assessments. I therefore propose to make new requirement “where appropriate”, recognising that the criteria are set at a national level.

SUDS schemes are approved by the LPA having consulted with the Lead Local Flood Authority and I will recommend that that be clarified. Similarly, the final paragraph rules out all development in the parish within Flood Zones 2 and 3. This

goes well beyond the national guidance and the provisions of Policy WDM2 of the adopted local plan and I propose to delete this part of the policy.

Recommendations

At the start of the first bullet point insert “Where appropriate”.

In the second bullet insert “LPA having consulted” before “relevant SUDS”.

Delete the final bullet point.

Policy EH5 - Grade 1, 2 and 3 Agricultural Land

The agricultural land classification is now shown on the OpenGov website not the DEFRA mapping system and I will amend the policy accordingly. This policy is broadly in line with national policy to protect the best and most versatile agricultural land. The exception including “land shown on the Proposals Map”. The objective of the policy is to exempt land allocated for development in the development plan which, of course, will include the neighbourhood plans as well as the local plan. I will recommend the modification of the wording to make that clear.

Recommendations

Replace “DEFRA Online system” with “OpenGov data website”.

Replace “shown on the Proposals Map” with “allocated for development in the development plan”.

Policy EH6 - Green Infrastructure and Biodiversity Opportunity Areas

I noted that the BOA land is also designated for this purpose in the Local Plan, however the areas shown on the neighbourhood plan is not as accurately drawn as it is in the local plans policy map and excludes areas already protected in the local plan. I have no evidence to justify a reduction in the area and it will cause confusion if a proposal fell within an area is designated in the local plan but not in the neighbourhood plan. Equally the suggested rewording of the policy, which the Qualifying Body offered in their response to my Initial Comments, essentially repeats the wording already in local plan but that wording is not as comprehensive as the local plan policy. This policy has generated an objection from the land owners, the Baird Family, who have pointed out that the Local Plan also has this allocation but does not include the restriction on development to agricultural use only. My view is that the proposed wording does not provide the same level of protection to the habitats as the local plan policy, which is already protecting the area, but it would also prevent the building of the new road, the illustrative line of which is shown on the Local Plan’s Proposals Map. I will accordingly be recommending that the policy be deleted.

Recommendation

That the policy be deleted.

Policy EH7 - Local Gap

Despite the concerns of the District Council, I fully recognise the desire of the local community to identify a gap between the new development and the existing community at Yapton. However, the policy as written prevents any development even if it were to be a development that did not undermine the function of the gap, e.g. a use of land. I will amend the wording accordingly.

The Proposals Map also identifies a smaller area which lies within the built-up area boundary and which has recently been developed. The Parish Council has indicated that it was drawn on the Proposals Map in error. I am able as part of my examination to correct errors and I will be recommending this area be deleted to leave a single parcel of land as a local gap.

Recommendations

Insert at the end of the policy” unless it does not prejudice the openness of the local gap”.

Amend the Proposals Map by removing the southern of the two areas designated as Local Gap.

Policy EH8- Light Pollution

This policy presumes against any lighting which detract from the unlit environment of the parish. I cannot see that this aspiration is consistent with the primary proposal to build a major housing development, on what is an essentially unlit former airfield. Not only will there be light from the houses but there will inevitably be a need for some street lighting, both for highway safety and to offer security for persons walking and travelling through the development at night. I noted on my site visit that the existing housing developments within the plan area incorporate street lighting. I consider that it is inevitable that there will be some increase in the level of illumination compared to what currently exists on the undeveloped parts of the parish. However, this is a genuine issue wherein, whilst the impact cannot be eliminated, it can be minimised by careful design. Rather than merely supporting low-level lighting, I consider that any major housing development should be accompanied by a lighting scheme that demonstrate how the proposals must seek to minimise the impact of lighting on the night sky.

Recommendation

Replace the policy with “All major development shall be expected to demonstrate through the submission of a lighting scheme that the lighting has been designed specifically to minimise the impact of the lighting on the night sky”.

Policy EE1- Support for Business

This policy not only allows upgrades to buildings, but as written also allows the extent of the site of existing employment premises, to be extended. I consider that the expansion of the three existing sites shown in Evidence Base 3, beyond the current boundaries, into what is either allocated as a primary housing development or into open countryside would not necessarily be desirable or compatible with strategic, or indeed in national policy. I consider that the policy should allow the existing buildings within the sites to be enlarged, but not necessarily the site itself to extend beyond the current boundaries.

Recommendation

Replace “sites” with “buildings.”

Policy EE2 - Retention of Employment Land

I have no comments to make on this policy.

Policy EE3 - Protection of Existing Buildings

This policy relates to new development with its primary purpose as set out in the justification is to ensure that the form and layout of any new residential development should pay proper regard to existing employment uses already established in the area which could affect the amenities of the new residents. This is a laudable policy which is entirely in-line with the requirements set out in the third bullet point of Paragraph 123 of the 2012 NPPF but it could be clearer in the wording of the policy. I intend to recommend the wording proposed by the LPA, which offers greater clarity.

Recommendation

Replace the policy with:

“New development should ensure that there is no conflict with existing uses. Mitigation should be appropriate to minimise, as far as possible, the potential effects identified to future occupants.”

Policy EE4 - Support for New Commercial Uses

I have no concerns regarding this policy in terms of compliance with basic conditions.

Policy EE5 - Tourism Activity

My concern is that the requirements for the proposed uses outside the built-up area to be “sustainable”, lacks the clarity which would allow a landowner or business to have the certainty as to how their application for planning permission would be determined. I propose to make the criteria clearer by referring to being a use of appropriate for a countryside location.

Recommendation

In the second paragraph replace “sustainable” with “appropriate to a countryside location”.

Policy EE6 - Communication Infrastructure

I have no comments to make on this policy.

Policy EE7 - Sustainable Commercial Building

SI consider that this policy should refer to all new commercial buildings rather than development, which could include plant or machinery. I consider that it is unreasonable to require energy generated infrastructure to be installed but accept that the building should be designed so that it is capable of being installed. I will recommend that the policy should be one of encouragement to applicants to provide energy generation, which is in line with the Parish Council’s stated approach described in paragraph EE 7.1.

Recommendation

In the first sentence replace “development shall” with “buildings will be encouraged”.

Policy EE8 - Agricultural/horticultural// Horsiculture

Whilst I understand the desire to retain rural employment, the existence of a neighbourhood plan policy cannot provide for the retention of an agricultural use. As worded, the policy would allow farmland to be used for other employment generating uses. Similarly, how would it deal with land in equestrian use but where the use is as a hobby rather than a business, directly employing people. Land outside the BUAB is already protected and as worded this policy is not workable. If a farm or horticultural use relies on contract workers or seasonal staff and does not employ local people, how would a planning application be determined? The policy does not pass the basic conditions and is recommended for deletion.

Recommendation

That the policy be deleted.

Policy EE 9 - Rural Buildings

I have no comments to make on this policy.

Policy EE10 - Quality of Design of Commercial Buildings

I have no comments to make on this policy.

Policy EE11 - Ford Industrial Estate.

The area the subject of this policy should be shown on the Proposals Map. I consider that the aspirations of this policy could be undermined in that the policy is not just to require *proposals to relocate* to exist but the replacement buildings should be constructed, before the existing site is allowed to be redeveloped for housing. This will help maintain the supply of employment uses within the plan area.

Recommendations

Define the area the subject of this policy on the Proposals Map.

Insert at the end of the policy “once the replacement employment space has been provided”.

Policy LC1- Support Independent Living

I have no comments to make on this policy.

Policy LC2 - Healthcare Facilities.

I have no comments to make on this policy.

Policy LC3 - Protection of Assets of Community Value

I have no comments to make on this policy.

Policy LC4 – Designation of Local Green Space

The plan proposes two pieces of land which are within the operational control of an HM Prisons, as designated areas of local green space. To meet the requirements of paragraph 76 of the 2012 NPPF, the green space need to be reasonably close to the community it serves. The evidence does not suggest which part of the parish is likely to use this land, but I envisage it will be primarily the properties off Ford Road, north of the prison. However, I do not consider that sufficient evidence has been offered that justify how and why the “green area is demonstrably special to the local community and holds a particular significance”. On both my site visit I did not perceive that the land offers the tranquility, as described, nor do the fact that “rabbits play and birdlife abounds” meets the threshold of this highest level of protection. Similarly, neither the use as overflow parking and that it is used for dog walking justifies its designation either. I have carefully noted the objections from the prison authorities and I appreciate that being within the operational jurisdiction of the prison could mean that, at any time, restrictions on public use could be removed, for example, if the land were to be given over to cultivation, as their representations have suggested. I have concluded that these two areas do not pass the threshold to justify being designated as local green space as required by the NPPF and accordingly I will propose that the policy be deleted.

Recommendation

That the policy be deleted.

Policy LC5 - Camping and Caravans

I have no comments to make on this policy which seeks to retain existing use.

Policy LC6 - Local Open Space

I have no comments to make on this policy and many of the spaces are already protected by the Local Plan. One site that is not covered is the highway verge, Site 6 which is likely to be under the jurisdiction of the Highway Authority who enjoy various permitted development rights. However, as the land is unlikely to be the subject of development proposals, I will not recommend its removal.

Policy H1 - Quality of Design

I have a number of concerns regarding elements of this policy. Firstly, matters relating to the construction principles and energy efficiency are matters that are now dealt with by the Building Regulations. The Secretary of State in a Written Statement to the House of Commons dated 25 March 2015 stated that neighbourhood plans should not set technical standards for housing and I consider that this policy attempts to do just that. Secondly the requirement for plans to “be subject to a design brief” is too onerous. Applicants for developments over 10 residential units are required to demonstrate how their scheme addresses such matters, within a Design and Access Statement. I will recommend an alternative form of wording. I commend the highlighting of elements of design that are often over looked at planning application stage. Rather than referring to being “considered early in the design process”, it would be preferable that these elements of design should be considered as part of the approval of the relevant design matters, rather than being dealt with by way of condition. I consider that this would be consistent with Secretary of State advice set out in the design section of the Planning Practice Guidance.

Recommendations

In the first paragraph delete “show solid construction principles, be energy efficient”.

At the start of the second sentence, replace “Plans with “Proposals for major development” and replace “be subject to a design brief which demonstrates” with “through their Design and Access Statement demonstrate”.

Policy H2 - Housing Mix

The proposed strategic allocation in this plan is aiming to partially meet the objectively assessed housing needs of the whole of the Arun district as well as contributing to addressing housing need in surrounding districts. I do not therefore feel that it is appropriate for an applicant to be submitting a Ford specific dwelling

mix and affordable housing strategy. I have not seen any evidence to justify the need, specific to the parish, to justify Lifetimes Home Standard. Equally I do not think that it is appropriate for the Parish Council to have to approve the provider of affordable housing – that is the role of the Housing Authority. A policy that provides only for a maximum of 30% affordable housing is not in compliance with the Local Plan's requirement that a minimum of 30% should be provided. I consider that is a strategic development plan policy and therefore this policy fails the basic conditions test. These matters are properly and adequately addressed in the Local Plan. I will be recommending that the second paragraph of the policy be deleted.

Recommendation

That the second paragraph of the policy be deleted.

Policy H3 - Windfall sites

The 2012 NPPF defines windfall sites as “sites which have not been specifically identified as available in the local planning process. They normally comprise previously developed sites that have unexpectedly come available.” The policy needs to be viewed against the policy which allows development within the built-up area boundary. In order to be consistent with Policy H SP 2 of the local plan, there needs to be a presumption in favour of all residential development, not just on all small sites (however small is defined) and cannot just be restricted to infill or redevelopment of sites.

In terms of the conditions:

— a proposal would have to have regard to relevant local plan policies on matters which are not covered by the neighbourhood plan, so I will amend condition (i) to refer to the adopted “development” plan.

- in terms of condition (iv) the proposal includes a preference for sites closest to local facilities. However, as all sites for within the built-up area, they are all, by their nature, suitable for residential development. It would create uncertainty as to how a site within the built-up area were to be determined if it were to be further away from local shops and schools

- the requirement of a target of 30% affordable housing provision should be expressed as a minimum of 30%, so as to be compatible with local plan policy. It also is stated as a requirement on all sites, which is not consistent with Secretary of State policy which requires affordable housing only to be sought on schemes of 11 units or more.

- reference to financial contributions to affordable housing, in condition (vii) is not required in the context of condition (v) as the- provision should be on site. Equally Secretary of State policy is that pooled contributions should not be sought on schemes of 10 units or under. I consider that this matter is already covered and in a

more comprehensive manner in Local Plan Policy INF SP1 and I will propose that it be deleted.

- condition (viii) requires a sequential approach, preventing greenfield site development within the built-up area if brownfield sites are available. That would deliver less development than the policies, as set out in the local plan and is not justified as development within the built-up area is, by its nature, acceptable in policy terms. I will be recommending that this element of the policy be deleted.

- I consider that the requirement that development on all windfall sites “wildlife..... and the natural environment must be conserved or enhanced” is both too vague and onerous and if there are specific protected species or habitats to be considered then these matters are dealt with by other policies or legislation.

Recommendations

In the first sentence, delete “small”.

In i) replace “adopted Neighbourhood Plan” with “development plan”.

In iv) delete the second sentence

In v) Replace “target” with “minimum” and after “sites” insert “providing over 10 units”

That criteria vii), viii) and ix) be deleted.

Policy H4 - Recreational Space

I have no comments to make on this policy.

Policy H5 - Local Connection

This policy seeks to require that the affordable housing be occupied by existing residents of Ford, those with a Ford connection, or those meeting a number of criteria apart from Armed Forces or related Personnel. It does allow that should a local resident not be found, then normal ADC allocation policy applies. This policy seeks to extend the responsibility for the allocation of accommodation for those in housing need, to pass from the Housing Authority to control through to the Local Planning Authority. Arun District Council as a housing authority, has its own allocation policy, which according to the Parish Council’s response already includes the policy to allocate 100% of all vacancies to applicants with a local connection to the parish. That is the appropriate mechanism for allocating houses to persons in housing need. It is a housing allocation policy rather than a planning policy and accordingly fails the test of being a “policy for the development and use of land” and accordingly I do not consider that it meets the basic conditions test. Furthermore, it ignores the fact that the strategic housing allocation at Ford, is not just to meet the objectively assessed housing needs of the parish but the district as a whole. It will be

entirely inappropriate for a new home to be allocated to a Ford resident in preference to a family whose housing need may be greater.

Recommendation

That the policy be deleted.

Policy H6 - Integration of New Housing

I have no comments to make on this policy.

Policy GA1 - Footpath and Cycle Path Network

I have no comments to make on this policy.

Policy GA2 - Parking and New Development

I consider that whilst curtilage parking for new dwellings is desirable, it is not always appropriate, for example in the case of apartments or terraced properties. I will clarify this matter by adding the caveat “where possible”

I understand that that the County Council is currently revising its parking standards.

Recommendation

Insert in the first sentence “where possible” after “should”

Policy GA3 – Streets and Access Ways to serve new development

I consider that requiring all the streets to have a pedestrian footway could preclude layouts which utilise shared services for the smallest residential enclaves and would run counter to the objective of the plan set out in the second paragraph of the policy, which is that “quieter streets should be designed to be suitable for a range of social activities such as children’s play.” It would also run counter to guidance set out in the national guidance “Manual for Streets”.

Recommendation

Delete the final paragraph.

The Referendum Area

If I am to recommend that the Plan progresses to its referendum stage, I am required to confirm whether the referendum should cover a larger area than the area covered by the Neighbourhood Plan. If the examination had taken place in advance of the Local Plan’s adoption, I would have concluded that being in mind the impact of the development would extend well beyond the plan area then it would most likely be appropriate for me to extend the referendum area into Climping and Yapton Parishes. However now that the strategic development area is firmly established in

the development plan then it is not the neighbourhood plan proposals that will result in significant levels of development in their vicinity. Therefore, I can confirm that the area of the Ford Neighbourhood Plan as designated by Arun District Council on 6th December 2013, is the appropriate area for the referendum to be held and the area for the referendum does not need to be extended.

Summary

It is important that the policies in the neighbourhood plan do not materially deviate from the strategic policies set out in the local plan, which has been adopted. It is important that the strategic policies governing what is one of plan's identified growth areas, are supported by the neighbourhood plan policies and certainly not undermined. This major new housing developments will be contributing to meeting the needs of the wider Arun community, as well as the existing Ford residents. I fully appreciate the aspirations of the neighbourhood plan to use this development to create a new heart to the village and provide much needed community facilities but at the same time for it to remain a small village.

I recognise that the Parish Council will not be happy with some of my recommendations especially my proposal to extend its built-up area boundary, but it must recognise that the enlarged built up area is already enshrined in the development plan and that it must not deliver less development that allowed by the local plan. I believe that I have been able to retain and incorporate many of the Parish Council's aspirations particularly in Policy SA1, which I have tried to ensure does not duplicate local plan policy but allows the neighbourhood plan to refine and shape the final development with complimentary policies reflecting local aspirations.

The changes I have recommended are all required, in my opinion, to ensure that the plan meets the Basic Conditions.

To conclude, I can confirm that my overall conclusions are that the Plan, if amended in line with my recommendations, meets all the statutory requirements including the basic conditions test and that it is appropriate, if successful at referendum, that the Plan, as amended, be made.

I am therefore delighted to recommend to the Arun District Council that the Ford Neighbourhood Plan, as modified by my recommendations, should now proceed to referendum.

JOHN SLATER BA(Hons), DMS, MRTPI

John Slater Planning Ltd

8th August 2018