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Please ask for:
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Mrs Alison Crabb
Barnham Parish Council
Barnham Community Centre
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PO22 0AY

Your Ref:

Our Ref:

Dear Mrs Crabb

Response to the Examiners Report in to the Barnham and Eastergate Neighbourhood Development Plan

Thank you for your document titled Response to the Examiners Report in to the Barnham and Eastergate Neighbourhood Development Plan (NDP).

We appreciate that Neighbourhood Planning is a challenge for parishes and their many dedicated volunteers but also note that Arun District Council is always able to offer advice and guidance as is our role in this capacity. It is hoped that through partnership working with ADC, neighbourhood planning becomes an easier task for the parish to understand.

As explained previously, the examiner's report for an NDP is not binding. This means that once we have the examiner's report, it is then for the LPA and parish to agree within the framework of the report any deviation from any examiner modifications hence no need to go back to the examiner unless there is clarity which the LPA requires.

For clarity please note that the page numbers which you have used although taken from the final report dated 7th May 2014, you have used the track changes document which was given to you in confidence to aid you in modifying your plan. The page numbers therefore do not correspond to the final pdf document which has been published.

We have reviewed your questions and provide the followings answers below:

page 5 para. 1.14

We note that Barnham PC has agreed to be the sole qualifying body for the whole of the Neighbourhood Plan area and this is supported by Eastergate Parish Council.

Recommend: A short statement at the start confirming this is required for completeness.

page 15 para 2.48

It is best practice for the examiner to have consideration for everything going on during the course of producing his report and this is acceptable as it ensures the plan is as future proof as possible.

Recommend: See comments relating to paras. 13.7 to 13.18

page 35 para 8.3

We agree with the examiner that the layout of the two boxes is confusing but agree with the Parish of the importance.

Recommend: Retain these tables after redrafting them to include the new policy headings. In addition a footnote identifying them as for ease of reference only would be acceptable.

page 38 para 8.10(b) 4.2.3

Local plan refers to the plan in place at the time where the report refers to the emerging plan it is generally referenced currently. We can clarify any specific location if needed.

Recommend: The Current Development Plan for ADC consists of:

- **The adopted Arun District Local Plan, 2003 (saved policies edition)**
- **The adopted West Sussex Minerals Local Plan, July 2003 (saved policies edition)**
- **The West Sussex Waste Local Plan Revised Deposit Draft, July 2004)**
- **Arundel Neighbourhood Development Plan 2014-2029**

page 41 para 9.10

It is unreasonable to add further stringent restrictions to this policy when the content of the Surface Water Management Plan is unknown. We therefore do not agree to the insertion suggested by you and recommend that the examiner's modification remain in its original form.

Recommend: Policy ES1 is kept as modified by the examiner.

page 45 para 9.28

ADC has noted the examiner recommends the policy be reworded and agrees with the modification.

Whilst we appreciate that you feel future development proposals in Barnham and Eastergate warrant the need for Code 5 and 6, the plan does not provide evidence of this. It is suggested that the policy be revised when the plan is reviewed in the future, which will give the parish ample time to have supporting evidence. However, ADC would accept a revised version of the suggested modification by the parish but reference to level 5 and 6 to be removed.

**Recommend: Policy ES11 Energy efficiency of new development
'All new housing development, with the exception of the conversion of historic buildings should have a minimum energy efficiency standard equivalent to Level 3 of the Code for Sustainable Homes (DCLG 2006)**

Policy ES12 - improved or increased to be inserted as recommended by the Parish

page 51 para 11.7

ADC agrees with the Parish.

Recommend: The sentence removed as suggested by the Parish. The policy would then read 'Proposals for new medical facilities will be supported.'

page 53 para 11.7

ADC agrees with the examiner on the failure of the local green space designations. Land South of Barnham Road fails all of paragraphs 76 and 77 of the NPPF. Land North of Barnham Road and east of Fontwell Avenue fails paragraph 77 of the NPPF on 2 points: 'where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, ... and where the green area concerned is local in character and is not an extensive tract of land.'

Recommend: The examiner's modification is kept.

page 56 para 11.27

ADC agrees with the Parish.

Recommend: The sentence from "Funds raised .." should be removed.

page 62 para 13.10 and 13.11

It is best practice for the examiner to have consideration for everything going on during the course of producing his report and this is acceptable as it ensures the plan is as future proof as possible.

The Parish states that there was no strategic housing allocation relating to Barnham/Eastergate/Westergate but this is not the case as the publication version of draft Local Plan (Summer 2013) clearly does so in policy SP11.

Recommend: No actual question has been asked here

page 63 para 13.14

ADC agrees with the Parish but in light of the fact that the plan is aware of the current situation and there is the opportunity to update it then it is best planning practice to do so.

Recommend: The examiner's modification is kept.

page 63 para 13.18

See comments above about page 38 para 8.10(b) 4.2.3

ADC agrees with the Parish and the policy should be amended as per our recommendation below. Also changing 'up to' to 'at least' which is consistent with the examiner's report para.13.12 section 9.1.3 and all other NDP plans and plan making.

Recommend: Policy H1 ' Permission will be granted for at least 60 new homes in Eastergate on land identified on the Proposals Map, provided that the development meets the requirements of the policies set out in this Plan and the Arun District Local Plan.'

page 64 para 13.12 section 9.1.3

ADC agrees with the Parish to remove the sentence.

Recommend: The following is removed 'although this could be extended in due course to a total of 100 units including neighbouring land'.

page 64 Policy H2

ADC agrees with the examiner and due to the complexity of windfall sites ADC recommends that the examiner's modification is kept

Recommend: The examiner's modification is kept.

page 64 Para. 13.19

ADC agrees with the examiner. Any affordable housing developed in Barnham and Eastergate will be made available by Arun DC as the local housing authority it will not be exclusively for the residents of Barnham and Eastergate but those in greatest need in the district in accordance with the Council's Housing Scheme January 2013. The policy also conflicts with ADC policy. ADC only has a local connection criterion for rural exception sites.

Recommend: The examiner's modification is kept.

We trust that you appreciate that in order for a planning policy to be robust it needs to be able to be justified, delivered and monitored. I therefore trust that the comments above would suffice in satisfying both councils so that the best plan possible can progress to the next stage.

Yours sincerely,

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Neighbourhood Development Plan Officer