

Appendix 1

ADUR DISTRICT COUNCIL RESPONSE TO SOMPTING PARISH NEIGHBOURHOOD PLAN (REGULATION 14 CONSULTATION, DECEMBER 2020 - FEBRUARY 2021)

SPNP Consultation version, December 2020	
General comments:	<p>We welcome the publication of the Sompting Parish Neighbourhood plan for consultation, and acknowledge the work undertaken by the Parish to progress the plan. The following comments are intended to be a constructive response, to help in the development of the plan.</p> <p>Many of the comments below have been made on previous occasions. It appears that the plan has not been properly updated since the version submitted to Examination and subsequently withdrawn, as references to the stage of the plan, and associated documents are incorrect.</p> <p>Paragraph 043 of the Planning Practice Guidance states that duplication of the planning process should be avoided. The issue of duplication was also raised by the Examiner in his Post Meeting Notes https://www.adur-worthing.gov.uk/media/Media_150047_smx.pdf (paragraph 2)</p> <p>The Parks Team have advised that the document could refer to the following: no net loss of biodiversity, and the provision of ecosystem services and natural capital services.</p>
Plan A page 6.	<p>This does not show the plan area (which the heading refers to) - this is an extract from the Adur Local Plan Policies Map. This is also replicated as Plan C later on in the document.</p> <p>You could perhaps delete this plan and amend paragraph 1.2 to instead refer to your Policies Map on page 27.</p>
1.3	<p>You may wish to remove the line 'the statutory process...' as it is incorrect; this consultation itself forms part of the statutory process.</p>
1.4	<p>It would be worth clarifying that the Housing and Estates Design Guide is intended to form part of the plan, and is itself published for consultation, in order to avoid any confusion.</p>
1.6	<p>Needs updating - refers to intention to submit plan in 2016</p>
1.7	<p>It appears this has not been updated from the previous version of the plan. As written this gives the impression that this plan is based on a previous pre-submission document; that this consultation version is to be submitted, and that examination is the next step. In fact this consultation is the first stage in the process and following submission a further Regulation 16 consultation stage is required.</p>

1.9	Is there a Consultation Statement published alongside this plan? This may refer to the document prepared to accompany the previous (withdrawn) version of the Plan).
	Some of the latter bullet points do not relate specifically to production of the neighbourhood plan. Please clarify. As mentioned previously, much of this could be removed and put into the Consultation Statement; once the document is adopted, this section will serve little use.
2.2	This refers to a character area map in Annex B. There is no map in Annex B, although there is a reference to ADC. If this refers to the map printed in error as Plan A, this is not a character map, but a map showing adopted policies.
2.7	Reference to Plan A - see above.
2.9	2.9 Cokeham Brooks is now known as a Local Wildlife Site; its boundaries were recently reviewed and extended.
2.10	Your Policies Map does not show the conservation area - in fact the document doesn't show it anywhere.
2.14	a) Is this the area now known as Malthouse Meadows Forest Garden? Can this be updated?
2.15	3rd bullet point. Original use? Do you mean previous/ current use? The ability of the planning system to address this has been changed since introduction of Class E.
2.17	A Local Cycling and Walking Infrastructure Plan has been prepared by Adur District.
2.18	For information the ADC Objectively Assessed Housing Needs Study 2015 has been superseded. The most up-to-date statement of housing needs can be found in the: Adur and Worthing Strategic Housing Market Assessment 2020. https://www.adur-worthing.gov.uk/media/Media.157227.smxx.pdf
2.20	How does this relate to the Housing and Estates Design Guide?
3.1	Given that both the Adur Local Plan 2017 and South Downs Local Plan have been adopted, please delete 'and emerging'.
3.2	PPG is updated from time to time, so you do not need to refer to 2014.
3.3	As previously advised, this paragraph needs updating. For that part of the parish in the SDNPA the relevant Local Plan is the South Downs Local Plan. For that part of the Parish outside of the SDNP, it is the Adur Local Plan 2017. For the whole of the parish, the West Sussex Waste Local Plan and West Sussex Minerals Local Plan should also be referred to. References to saved policies of the 1996 Adur Local Plan should be deleted. Plan B page 16 can now be deleted.

	<p>This matter was referred to in the Examiner's Final Report (paragraph 9)</p> <p>https://www.adur-worthing.gov.uk/media/Media_150137.smxx.pdf</p>
Page 16	<p>This is titled 'planning policy sites within Sompting Parish' but in fact shows an extract from the Adur Local Plan 1996 Policies Map, which is no longer relevant.</p>
3.13	<p>Policy 10 has already been set out on the previous page - could cross-refer to the previous reference.</p>
3.5 - 3.8	<p>This section needs to be updated to reflect the adoption of the South Downs Local Plan.</p>
3.9	<p>This paragraph is better suited in another section, as it does not relate to the Adur Local Plan.</p>
	<p>The adopted Local Plan paragraphs 3.7 - 3.10 refer to Sompting</p>
Page 19.	<p>Plan C could be better titled 'extract from Adur Local Plan 2017 Policies Map'.</p>
Page 20	<p>Plan D is again the same map as Plan C and A</p>
Page 23	<p>Plan no longer refers to design zones.</p>
4.6 - 4.7	<p>ADC would welcome discussion with representatives of Sompting PC (and potentially officers of the National Park) to agree which policies can be monitored by the Local Planning authorities, and what additional local level monitoring the Parish wish to undertake.</p>
5. Community Aspirations	<p>We would recommend moving this to after the Neighbourhood Plan policies. The paragraph before 4.10 introduces the policies so it is confusing for the reader to then have this section before the policies. We are also unsure what the purpose is of the ALP extract maps on pages 27 and 28.</p>
Page	<p>Assets of Community Value: We note the proposed Assets, however as previously explained to the Parish Council, there is a separate application process for Assets of Community value. These can be progressed outside of the neighbourhood plan process.</p>
5.4	<p>This states the PC supports the sympathetic redevelopment of the former waste transfer station. Is there a policy to this effect?</p> <p>We note the text here simply stated the Parish Council's support for the redevelopment of this site. However we would highlight that should this revert back to a policy allocating the site for redevelopment, the District Council (in liaison with the SDNPA) would need to revisit whether a SEA is required.</p>
Page 26	<p>Community facilities - is there a policy on these proposals? If so it would be worth cross-referring to it)</p> <p>(For information, with regards to the proposals for the proposed</p>

	<p>changing rooms and potential changes to the Harriet Johnson Centre, the SPC will need to seek landlord's consent before any alterations can be made to the property).</p>
<p>Policy1</p>	<p>Strictly speaking this policy isn't necessary, as you do not need to say that development must be in accordance with the development plan.</p> <p>If this policy is retained it should be amended, because as written it infers that development proposals not on the Policies Map do not have to accord with the ALP/ SDNPA. It should perhaps be rewritten 'All development proposals...'</p> <p>As above - all references to saved policies and emerging plans should be removed (paragraphs 1.1 and 1.3) from text.</p> <p>Para 1.2 states that the policy acknowledges the West Sompting allocation, but in fact it makes no reference to it. Also para 1.2 should refer to the adopted Adur Local Plan - not PSALP. (The Proposed Submission ALP was an earlier version).</p>
<p>Policy 2: Future development, affordable housing and housing for rent.</p>	<p>Are you expecting all levels of development to provide a Landscape and Visual Impact Assessment? This may not be practical, and should perhaps be limited to larger developments - for example major developments (eg residential developments of 10 dwellings or more). This section relating to landscape and views would be better located in another policy. Otherwise it infers that this requirement relates only to residential development.</p> <p>With regards to the local connection policy, our advice to you dated January 2019 included the following quote from the then Head of Housing:</p> <p>"Allocation of social housing is governed by Part 6 of the Housing Act 1996 (as amended). Section 167 of the act states as below,</p> <p>(1) Every local housing authority shall have a scheme (their "allocation scheme") for determining priorities, and as to the procedure to be followed, in allocating housing accommodation.</p> <p>(8) A local housing authority shall not allocate housing accommodation except in accordance with their allocation scheme.</p> <p>The proposed local connection definition contradicts Adur District Council's allocation scheme (Register of Housing Need and Choice Based Lettings Policy) and therefore will be a breach of the relevant legislation. For this reason, we are unable to support the proposed changes."</p> <p>The current Head of Housing at Adur & Worthing Councils has confirmed that he endorses these comments. As such, we again ask that references to a local connection test are removed from the Neighbourhood Plan</p> <p>You do not need to refer again to the ALP -paragraph 043 of Planning Practice Guidance states that duplication of the planning process</p>

	<p>should be avoided.</p> <p>Housing and Tenancy mix - again it is not necessary to repeat the provisions of the ALP 2017. Please remove.</p> <p>Policy 2a: Housing types: The Adur Local Plan (and subsequent Strategic Housing Market Assessment 2020) sets out the mix of housing needed for adur's residents, both market and affordable tenures.</p> <p>2b; this repeats the provisions of the housing and tenancy mix section again, and is already addressed by the ALP - please remove.</p>
2.1	See comments above regarding local connectio.
2.2 Number of dwellings	<p>The reference to 480 homes relates to the ALP allocation at West Sompting, rather than Sompting Parish generally; this would benefit from clarification. However it is not clear why this is referred to here.</p> <p>We note the text relating to the ADC choice-based lettings system, but would request that our comments above are taken into account.</p>
Policy 3 Sustainable Design	<p>General point - this policy would benefit from renumbering as there are two sets of i-iii</p> <p>i) Should this refer to HEDG 2020? Is the HEDG not part of the Plan anyway? As raised previously (eg 2018) this seems to infer that all parts of the parish share the same characteristics. Given that much of the development within Sompting's built up area boundaries consist of post war development we would query whether it is appropriate to apply the requirement for 'aesthetic qualities of traditional rural settlements and buildings' throughout the parish. These types of development are primarily found within Sompting Conservation area, the historic village, although the policy does not make this clear.</p> <p>iii) As raised previously it is not clear how a threshold height of 3 storeys is justified; there are already some blocks of flats in Sompting, and these types of homes can meet the need for starter/smaller properties referred to elsewhere in the plan. Should second line say 'in keeping with the character of the local area'?</p>
	<p>i) To address surface water management you might want to refer to guidance produced by West Sussex County Council:</p> <p>https://www.westsussex.gov.uk/fire-emergencies-and-crime/dealing-with-extreme-weather/flooding/flood-risk-management/sustainable-drainage-systems/</p> <p>(For info, the term wastewater generally refers to foul)</p> <p>ii) Renewable energy requirements are set out in ALP policy 19. It may be worth considering if this addresses this matter sufficiently.</p> <p>viii) 'rural nature of village' - which area does this requirement apply to,</p>

	<p>and what does it mean? Does it refer to the whole parish? The ALP defines the rural area as that area outside of the defined Built Up Area Boundary. How would a development proposal demonstrate this desire? This doesn't seem to be written as a policy. If you are happy with the ALP and SDNP policies in relation to light pollution you don't need to include a reference to this matter here.</p> <p>ix: As raised previously ADC have concerns regarding the buffer zones on the grounds of safety/ antisocial behaviour, litter, and general management. Is this buffer expected between all new housing developments (how would this work for a development of 1 or 2 houses?), or just the West Sompting allocation? As written it appears to refer to the West Sompting allocation, but it doesn't actually say this. Do you envisage pathways/public access through these buffer zones?</p> <p>Glad to see the issue of management has been considered (3.3) although you will need to make alternative arrangements should this group cease to exist.</p> <p>xi) ADC has its own external space standards. Are there specific standards in the HEDG?</p>
3.1	<p>Are you referring to the historic core of the village (eg the conservation area?) If so, the majority of Sompting's development is not in keeping with this.</p>
Policy 4: Sompting Local Centre	<p>Seadown Parade, The Parade, and Hillbarn Parade are already protected under ALP policy 27; therefore for these three parades this policy is duplication of the Local Plan.</p> <p>Furthermore, please be aware that since the introduction of use class E on 1st September 2020, retail uses (A1) are to be treated as Class E and can therefore change to other uses in Class E without requiring planning permission.(As such the existing ALP policy will need to be reviewed in due course, to reflect this change in policy).</p> <p>Given this, it is suggested that this policy is reviewed.</p>
Policy 5: Local Green Spaces and Open Spaces and Policy 6	<p>References to NPPF need to be updated as the document was revised in 2019; relevant paragraphs are now 99 and 100.</p> <p>Policy 6 states that development ancillary to recreational purpose will be acceptable to sites listed under that policy; why is the same exception not given to the sites in Policy 5?</p> <p>Given that some of the areas listed under Policy 5 are recreation grounds, are you saying that development ancillary to use as an open space is not appropriate in those cases? This appears to be in conflict with policy 32 of the ALP 2017.</p>
Policy 7: Rural businesses	<p>i)Would suggest this criterion reads 'accord...with relevant policies of the ... development plans and where necessary' (rather than 'or').</p>

	<p>v) Loose Lane - located in gap; any development here will therefore need to comply with policies 13 and 14 of the ALP 2017.</p> <p>viii) Query the role of this criterion. Policy 13 of the ALP makes clear that development will only be permitted where the need for a countryside location is essential - for quiet informal recreation or the essential needs of agriculture/ horticulture. As such retail/ cafe uses as set out in part c) of your policy would appear not to comply; are you referring to a cafe use as ancillary part of community farm? If so, this is not clear.</p> <p>In addition it appears that you propose ancillary cafe uses in Policy 8 - are you anticipating further such uses in addition to this?</p>
7.3	<p>Strategic Vision of Sompting Estate. Not clear on status of this - as appended it appears to form part of the plan - are you anticipating this would form part of the document that would be examined? It seems more appropriate as part of the evidence base, and therefore should be separated from the Plan. However, this document does contain some useful explanation and justification of some proposals in the plan (eg the proposed barn at Loose Lane); some text could perhaps be replicated in the Neighbourhood Plan to explain the basis for the proposals.</p>
7.4	<p>See previous comments regarding saved policies.</p>
Policy 8	<p>ii) community farm:</p> <p>Should the community farm proposals form part of Policy 7, if that is what the cafe/retail business in Policy 7 refers to? What are the 'processing facilities' referred to?</p> <p>We would advise grouping criteria iii and iv with the rest of the policy.</p> <p>Criterion iii. Is the growing space referred to in the West Sompting allocation (Policy 6) in the Adur Local Plan? If so this does not need to be repeated. What are the 'necessary and proportionate service facilities' referred to in this criterion? 8iv - will need to comply with Policies 13 and 14 8.4 Remove reference to Council officer.</p>
8.1	<p>You may wish to clarify what LEMP means</p>
Policy 9	<p>ii) Is there a reason Dankton Lane is mentioned as a potential site for health and wellbeing uses?</p> <p>Do you define somewhere what your definition of health and wellbeing uses is?</p>
Policy 10/4.51	<p>The supporting text refers to heritage and landscape issues, but these are not reflected in the policy.</p>
4.52	<p>See previous comments regarding saved policies. Does the South</p>

	Downs Local Plan refer to broadband matters? Given Policy 37 of the ALP, is this policy required?
Policy 11 Sustainable Transport	<p>We welcome the principle of a Sustainable Transport policy; West Sussex County Council are best placed to comment on many aspects of this policy, as Highway Authority. In addition Policy 28 of the Adur Local Plan addresses a range of transport and travel matters.</p> <p>5 Cycle paths. You will be aware that Adur & Worthing Councils have recently adopted a Local Cycling and Walking Infrastructure Plan. This might be worth referring to in the supporting text? Are there any proposed routes within it which might also be of interest?</p> <p>6 There is a heading 'Low Carbon Policy' - are the paragraphs below part of Policy 11?</p> <p>6i-vi - all new residential developments - even of 1 dwelling? viii) Is a Personal Travel Plan co-ordinator proposed by WSCC? How would this be achieved?</p>
Policy 12 Protection and enhancement of community facilities and services	<p>Bullet point 4 - these sites also seem to be protected by Policy 5. Is this duplication necessary?</p> <p>12 a,b,and c: these issues are addressed in the Adur Local Plan and do not need to be repeated. Furthermore, addressing these matters in this policy seems to imply that they are only a concern in relation to the protection and enhancement of community facilities and services.</p> <p>Should the reference to a sports pavilion on Sompting Recreation Ground actually be part of the policy?</p> <p>Ditto with regards to the reference to proposals for the Harriet Johnson Centre, and the last paragraph of text (unnumbered) below Policy 12? As referred to above, any changes to the Centre will require consent of Adur District Council as the landlord.</p> <p>The OS map extract requires a copyright reference.</p>
Section 6	<p>6.3 As raised previously with the Parish, the monitoring of all policies (not just sites) needs to be addressed.</p> <p>6.4 Developer contributions for education and health are sought from relevant development, and using advice from the education authority and health bodies (eg PCT). The Adur Infrastructure Plan sets out priorities for use of these monies, and will be updated alongside a review of the Adur Local Plan 2016.</p> <p>6.4iii refers to improvements to cycle and pedestrian networks in Sompting parish 'as indicated on the Policies Maps' - not clear that they are shown on this map?</p> <p>6.5 As raised previously Adur does not have CIL. It is recommended that paragraph 6.5 is revised or deleted.</p>

HOUSING AND ESTATES DESIGN GUIDE

	As no page/paragraph numbers are given, we will assume the first page is page 1, etc.
Page 3	Lower Cokeham is now a Local Wildlife Site rather than SNCI
Page 3 second paragraph	<p>Do not understand first sentence. Are you talking about opportunities for further residential development? Second line - Local Plan policy address appropriate uses in the Local Green Gap suggest this paragraph is reworded.</p> <p>There was previously a reference to the West Sompting allocation here.</p> <p>Final paragraph before 'Buildings' Section: Not sure the term infrastructure has been used correctly. Do you mean features?</p>
Section 1 buildings.	<p>the photographs could be rearranged so that you have the historic properties together, perhaps on one line, then below, photographs of newer properties which use those materials/ have similar characteristics.</p> <p>'Any new development should follow these lines...' Any? Does this include residential extensions? Does this include non-residential development? Or do you mean newbuild residential only? Do you expect to see these features on new build properties throughout the Parish? Given that much of the residential</p>
	development within the Built Up Area boundary consists of postwar development, are some of these requirements really appropriate/ necessary in all locations?
	This paragraph refers solely to materials. Are there any other matters, such as mass/bulk/height that are relevant?
	'Developers should restrict the forming of flats...' What does this mean when applied to development across the whole parish? What is the particular concern with regard to flats - does it relate to the need for, or design of some flats?

	<p>On one hand you wish to restrict building heights to no higher than three storeys but on the other you recommend careful use of roof space to negate the need to expand outwards - are these contradictory? Given the high level of housing need in Adur, and the range of dwelling types required, flat developments certainly meet some identified needs. No justification has been given for the restriction of flats to three storeys.</p>
2 Walls	<p>Is the use of strong boundary features e.g. walls worth highlighting in itself before going on to describe the most common materials? Is this something you are seeking developers to incorporate or is it just where they chose to, you would encourage them to use these materials?</p>
	<p>The start of this section describes flint walling as being commonly used in relation to arable and pasture land. It is not made clear why this material should be used in other contexts</p>
	<p>Last sentence - think you mean biodiversity rather than diversity?</p>
3 Roofs and chimneys	<p>In addition to encouraging developers to reflect the style of surrounding properties, would you also be encouraging them to reflect the materials?</p>
	<p>The final paragraph regarding views will be difficult to apply in practice.</p>
4 Windows	<p>The para on windows in the Conservation Area is not clear. We do not always have control over windows in the Conservation Area, especially if the design replicates the existing.</p>
5 Carbon Emissions	<p>As mentioned in our comments of August 2017, as a result of the Government's Housing Standards Review the Code for Sustainable Homes has been withdrawn and the Government has advised that qualifying bodies preparing neighbourhood plans should not set in their emerging neighbourhood plans any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings. We therefore recommend this section is deleted.</p> <p>Policies 18 and 19 of the Adur Local Plan 2017 promote sustainable design and consideration of renewable or low carbon energy.</p>
6	<p>Seems to require a heading?</p>
7 Trees	<p>The tree section could be misinterpreted: although the first sentence mentions Conservation Areas, the second sentence in isolation could be taken to mean that no tree at all can be removed without notice to the Council. The second sentence needs to reflect that this is for non preserved trees in the Conservation Area only.</p>

<p>8 Hedgerows and Ponds</p>	<p>We are unsure how paragraph 3 on surface water flooding relates to hedgerows and ponds. This could benefit from being in a separate subsection.</p> <p>There is no requirement for developers to provide evidence on what measures are to be taken to reduce the effect of surface water flooding. Please remove the line beginning:” The Local Authority will require...’</p> <p>Where a Flood Risk Assessment (FRA) is required this should assess flood risk to and from a development and set out how this will be managed across the lifetime of the development.</p> <p>The guide refers to flood preventative measures which enhance conservation. For clarity we would recommend replacing this with’...would expect the developer to take every opportunity to incorporate the use of Sustainable Drainage Systems(SuDS) that enhance biodiversity.’</p>
<p>10 Street Furniture</p>	<p>Last paragraph; ‘The Council has a policy on the provision of bus shelters’.</p> <p>Is this referring to a proposed Neighbourhood Plan policy, or a preference of the Parish Council? Or WSCC? You may wish to clarify this. It would be worth specifying the ‘Parish Council’ to avoid confusion, if that is what you mean.</p>
<p>11 Estate design</p>	<p>Given that this is a separate section on estate design, should it cross-refer to the issues raised in the previous Sections?</p> <p>The first paragraph talks of unity and houses blending into surroundings, whereas section 3 states buildings ‘should not be all the same’. Should this section refer to avoiding repetition of dwelling types, or something similar?</p> <p>Point 2 states that ‘Variation in types and size of dwellings should reflect the existing mix and importantly local needs’. The Adur Local Plan refers to required housing sizes for market and affordable dwellings.</p> <p>The Strategic Housing Market Assessment 2020 provides an up-to-date assessment of needs, for both market and affordable tenures.</p> <p>Point 4 Garage compounds can lead to security issues, and are often used for storage, rather than parking cars. Suggest Police are consulted with regards to Secured by Design issues.</p> <p>Point 5: The retiling of roofs would not require planning permission. Suggest this is deleted.</p>