

ANGMERING NEIGHBOURHOOD PLAN

Regulation 14 Pre-Submission Plan Comments Received

Arun District Council (ADC)

Page No.	Para	Comment	Action by Steering Group
SPECIFIC CONSIDERATIONS: <i>Note: Page number references relate to Pre-Submission Plan.</i>			
Page 4		The Maps on page 4 are poor quality and not sufficient for a plan document.	Higher resolution map inserted. Plan Updated
Page 11	2.25, 2.26 and 2.29	Point 1. Paragraphs 2.25, 2.26 and 2.29 are not clear and needs rewriting so as to make sense and be clearer	Agreed. Paragraphs re-worded Plan Updated
Page 12		reference to SDMP 2008 – this was replaced in 2013. Please update	Agreed. Suggested new wording provided by SDNPA. Plan Updated
	Fig 2.1	Fig 2.1 is illegible	Replaced with higher resolution version of map. Plan Updated
	3.21	Please specify which report is being referred to here	Report specified – Arun IDP (Infrastructure Delivery Plan) Plan Updated
Page 13		Point 2. Spelling mistake. The sentence should read'set up' not 'se up'	Typo corrected. Plan Updated
Page 15		Point 3 not sure of value of the light grey comments which relate to 490 dwellings not the 600 currently proposed	490 dwellings is defined in the latest version of the Arun Infrastructure Delivery Plan (IDP) 2013, which was the original strategic housing allocation for Angmering under the emerging Arun Local Plan. The current strategic housing allocation for Angmering is 600. The Plan has been updated using the latest information supplied by WSCC, as part of their Consultation input based on the latest draft version of the IDP being discussed between ADC and WSCC. Plan Updated

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Page 16	3.36	so where is their allocation?	The site is identified as its Parish Housing site at Mayflower Way. Plan Updated
Page 16	3.38	What does that mean?	Wording amended . . . “through the Parish Council”. Added to the end of the sentence. Plan Updated
Page 19	3.60	Especially considering the point in the recent Examiner’s decision there could be a conformity issue resulting from this. Though intentions may be understood implementation of this could be an issue as not in line with County guidelines. Recommend that the end of this is removed and it is simply reduced back to the basic point.	During consultation with the public, parking provision was a major issue and their very clear wish was that this paragraph be included No Action
		Light grey comments – Is there value in quoting a document that is 10 years old?	The Arun 2004 Bramley Green Survey highlights the impact of an actual major new development in Angmering on infrastructure, services and changes to the demographic profile of the community. Policies in the Plan have tried to learn lessons from its findings, especially in areas such as design and lay-out and car usage. Paras 3.8 and 3.9 have been added to clarify reason for referencing the Survey. Plan Updated
Page 22		Environment and heritage. The other topics such as public transport have information relevant to the district. This section does not describe this historic environment.	Agreed. Section re-ordered. “Constraints and Opportunities” has been moved to the end, with “Environment and Heritage“, now following immediately after “Transport and Movement”. Plan Updated
Page 22		Conservation and Heritage: reference should be made to the councils identified ‘Buildings or Structures of Character’?	Agreed. Reference added under “Constraints and Opportunities” – Conservation and Heritage (which has moved to page 29). Plan Updated

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Page 23	Figure 3.2	What is the red line on this map intended to represent as it is not within the key on p22. There is also an inaccuracy as the area to the east of the village has never been in either a Gap or GIC. Correction to map required and addition to key on page 23 to identify red line.	Key for Parish Boundary (which is what the red line is) has been added. Plan Updated
Page 23	Map 3.2	Map 3.2 – the resolution needs altering on this map to make it more legible	Figure 3.2. (Map Showing Spatial Challenges and Constraints to Development). Clearer map inserted. Plan Updated
Page 34		Would the survey analysis be better as a separate doc or annex?	They are a high level summary of key findings from the 2012 APC Neighbourhood Plan Survey document and are important to demonstrate to parishioners how their feedback has influenced their Plan. No Change
	5.3	First bullet point <i>'taken as a whole'</i> does not read well – make sense	Wording amended to clarify. Plan Updated
Page 44	Policy HD2	to 2019? should be 2029	Corrected. Plan Updated
Page 48	fig 6.5	is not suitable for devt plan	We believe that a picture clearly illustrates what the policy means. No Change
Page 48	Policy HD7	Minor amendment needed to second bullet point. End of bullet point 3 potentially restrictive, most likely going to be case by case judgment related to impact Following minor amendment needed to bullet point 2: "...character of the existing built form and create a ..." Suggest end of bullet point 3 is removed as follows: "...or through the exploitation of existing changes in ground levels."	We do not agree. There are areas in Angmering where housing is on rising ground. The intention of this policy is to prevent developers exploiting ground-levels to introduce 2.5 and 3-story houses that are not sympathetic to the existing built form. No Change

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Page 53	Policy HD11	There are a number of instances although that identified here is the first where you mix responsibilities in requiring that there is an agreement with the parish as well as the relevant statutory agencies	Queried with Donna but no reply. No Action
Page 50	Para 6.24	This needs updating to refer to the relevant national legislation, the NPPF which replaced PPS3 in 2012. Deletion of existing paragraph and replace with following amendment: "Paragraph 47 of the NPPF refers to the need for local planning authorities to set out their own approach to housing density reflecting local circumstance. Aspects of form and design quality policy contained in the emerging Local Plan, allows for this to be done within this neighbourhood plan."	Wording replaced as suggested. Plan Updated
	Policy HD1	whilst we note this policy is Built up area boundary, there does not seem to be wording for the actual policy ie. policy wording in a box. Is map 6.1 from the 2013 plan? The wording needs to be revised, as it stands this would preclude strategic growth at Angmering – perhaps remove reference to eh 2013 LP and just have the emerging LP	Agreed. Wording amended. Plan Updated
	Policy HD3	2 and 3 bed are already 59% in the SHMA. This is too prescriptive and evidence to justify this is needed if it is to remain	Should have read 1 and 2 bed. Supported by 2011 census figures which show far lower % of 1 and 2 bed dwellings in Angmering. Compared to Arun. See figure 6.3. Plan Updated
	Policy HD4	Local Connection - This policy conflicts with ADC policy. ADC only has a local connection criterion for rural exception sites so this would not be supported by ADC.	Wording updated to clarify that dwellings will be provided by affordable housing providers i.e. under the Parish Council Power of Wellbeing, or as a Rural Exception Site, or by a Community Land Trust. Plan Updated

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	Policies HD6/7	These would benefit from being more positively worded	Advice sought from Consultant but difficult to comment as the query is not specific in what needs to be tightened up. No Action
Page 50	Policy HD9	There are a number of issues with the start of this policy. As written it is more supporting text than policy. In addition, we would suggest that the end of it is removed as it is not necessary. Would recommend that the first para of this policy is shifted into the supporting text with amendment as follows: “There is no arbitrary or fixed definition of the ‘immediate surrounding area’ of a development....buildings and landscape setting outside the built up area boundary.” That it is then replaced with: “New development, where applicable, should meet the following density requirements.”	Suggested wording changes made. Plan Updated
Page 50	Policy HD9	Minor amendments required to the bullet points of this policy. The second bullet may be restrictive without this as would mean applying to extensions etc. as well. The last sentence of the first bullet point (in red) should be removed (N.B. More appropriate to be referenced in supporting text. “area. Guidance on past densities achieved in Angmering is provided in the Angmering Density Survey. ” Following amendment beginning of the second bullet: “..Presumption against new development outside...”	Suggested wording changes made. Plan Updated

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Page 51	Policy HD 10	are the figures cumulative – i.e. if in garage does not need to be elsewhere? If not these are too high	These figures are cumulative. See feedback to ADC from residents on the new estate in the 2004 Bramley Green Survey (extract on page 19 - grey text). Angmering is a "commuter dormitory" car use is not declining. Problem of parking provision is still an issue with residents today. This policy is considered as crucial in ensuring adequate off-road car parking is provided. No Change
Page 51	Policy HD10	The parking standards in HD10 seem quite high (potentially 3 spaces for a one bed flat one of which must be a garage). This should perhaps be reviewed. The third bullet point of this policy is not something that falls under land use planning. Minor amendment needed to the last paragraph of the policy. Bullet point 3 should be removed Recommend minor amendment as follows: “...visiting the site, a WSCC Car Parking Capacity Survey, using the methodology set out within the County Council Parking Standards SPD, should be undertaken to determine:”	We believe the evidence of high car usage in Angmering on new development due to the higher percentage of young families and cars per household supports the higher level of off-street parking required for future new development. Table in Policy has been amended Suggested changes to wording made. Plan Updated
Page 53	Policy HD11	does this relate to the NP allocations or others allocated by local plan (shouldn't be the latter) 2nd paragraph of this policy needs a minor typo correction. Following minor correction required:“...planned large multi-phased...”	This is specifically what the public wanted as evidence in the surveys. Will await opinion of Examiner. No Action Wording in 2nd paragraph amended. Plan Updated
Page 55	Policy CLW1	The last bullet of this policy mentions developer contributions being required from all new resi developments. This could potentially be onerous as this would mean it would apply to extensions, without any trigger or level set. Suggest following minor amendment: “Developer contributions will be sought from all new	Wording amended.

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		residential developments of 10 or more dwellings towards the funding of this community facility.”	Plan Updated
Page 55	Policy CLW1	this policy should also make reference to CIL	Wording amended. 3rd bullet point now reads: “Developer contributions (for example from CIL or S106 as applicable) will be sought. . . “ Plan Updated
Pages 56-57	7.15 & Policy CLW3	As nothing has currently been provided to support the content of this para, do you have anything to support this statement, otherwise there could be 2 concerns with this. A – it could be that there is an issue in terms of deliverability and B – there could be a contradiction considering they equally seem to be allocating this for housing. There is no Appendix E included, so unable to make any comment in relation to this at present. Recommend that something showing support to deliver allotments is included.	Wording amended to give more detail. Appendix E was available on PC website Plan Amended
Page 60	8.1	Minor addition needed to the end of this, as seems to be an omission. Following addition to finish paragraph needed: “...provide local employment.”	Corrected Plan Updated
Page 62	8.14	Minor correction to sentence for clarity. For clarity following amendment suggested: “...Angmering and who are in employment work outside..”	Wording amended. Plan Updated
Page 65	Policy TM1	The requirement that “no development should require vehicular support” would be overly restrictive and onerous and is not positively written. Similar issue to that above relating to the second bullet point of third para in policy. The last bullet point essentially replicates that above. Recommend that this requirement is removed from the policy. Recommend that following addition made to the end of the bullet point to make increase its flexibility	Recommended changes made to Policy.

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		<p>“..road design, unless shown to be unviable;” Recommend that the third bullet point is removed in its entirety.</p>	<p>Plan Updated</p>
Page 67	Policy TM2	<p>Number of amendments needed to this policy. Again have you discussed any of this with the County Council, is this likely to be practical? Minor change to initial paragraph: “...impact of the traffic which they will generated both during and...” Amend the first bullet as follows “...reduce through traffic through in the conservation.. (Reference Parsons Brinkerhoff study)” Amend last bullet point as follows: “...through traffic;, particularly HGV traffic and direct it around and away from the village through good improved signage. Also recommend that outcome of discussions with County provided or that discussions are set up to discuss these points with them.</p>	<p>Wording amendments agreed</p> <p>Plan Updated</p>
Page 67	Policy TM2	<p>first bullet point does not make sense ‘more favourably’ than what. Third bullet point is to onerous and would not be capable of being implemented by DC – it needs to be down to individual site issues</p>	<p>1st bullet amended to remove the word “more”. 3rd bullet – no change. Based on communities experience of new development failing to deliver infrastructure.</p> <p>Plan Updated</p>
Page 68	9.17	<p>WSCC needs to be included</p>	<p>Agreed. WSCC added.</p> <p>Plan Updated</p>

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Page 68	Policy TM3	<p>Under the first bullet of this policy what is Directness intended to be? The inclusion of all in the last paragraph potentially makes this onerous in terms of smaller applications for extensions etc.</p> <p>Suggest that Directness is replaced with Access and connections</p> <p>Recommend that the last para is amended as follows: “...sought from all new developments of 10 units or more to fund...”</p>	<p>“Directness” to remain. If Rights of Way are not direct then people will find shortcuts to make them direct</p> <p>“Access and connections” added as separate bullet point.</p> <p>Changed number of dwellings from 20 to 10</p> <p>Plan Updated</p>
Page 72	Policy EH1	<p>The use of the phrase ‘there will be a general presumption against’ is not supported. For instance the loss of any listed building should not be supported. The first para of this policy should be removed as this is not a policy as written. Amendment needed to the (current) second paragraph of this policy. Third bullet point needs amending for clarity.</p> <p>First para should be removed in its entirety from this policy and moved to be an introduction to the following policy pm Conservation Areas.</p> <p>Recommend the following amendment to the second para of this policy: “...themselves become that distinctive, that they will and may need the...” The use of the phrase ‘there will be a general presumption against’ is not supported. For instance the loss of any listed building should not be supported</p> <p>Amend the third bullet point as follows: “...structures themselves, therefore development will be objected to where there will be any that has a detrimental effect on the setting...will be resisted.”</p> <p>Include a glossary or similar so that words such as setting are understood.</p>	<p>Wording amendments agreed</p> <p>Glossary of terms has been added.</p> <p>Plan Updated</p>

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Page 72	Policy EH2	<p>The policy doesn't really talk about the type of development that is required? It merely focuses on the information required to make a decision.</p> <p>The first bullet point mentions that the Design and Access statement needs sufficient detail for proposals to be properly understood – what is this intended to cover?</p> <p>The last three bullet points would seem slightly onerous for smaller developments such as extensions.</p> <p>Furthermore, these would seem very detailed and would in general be intended to be dealt with through apply and discharging conditions.</p> <p>The second para and associated criteria listed would seem to be more appropriate as supporting text to the policy.</p> <p>Recommend that there should be an additional list provided, either continuing the bullet or after it.</p> <p>Consideration should be given as to whether these should be removed from the policy and only discussed through the supporting text, which is currently missing for this policy.</p> <p>Recommend that this is removed from the policy and is switched into the supporting text for the policy, which is currently missing.</p>	<p>Policy EH2 and supporting text revised.</p> <p>Plan Updated</p>
Page 72	Policy EH2	<p>does not mention the automatic protection that existing trees have within Conservation Areas and this should be raised here</p>	<p>Omission also raised by SDNPA</p> <p>Protection of trees included.</p> <p>Plan Updated</p>

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Page 74	Policy EH5	Amendment is needed to the last two paragraphs. Suggest that para 2 (and 3 of this policy as currently written) is removed in its entirety and replaced with the following combining it together with the last for ease: “The Landscape and Visual Impact Assessment should have regard to the South Downs Partnership Management Plan and other National Park planning documents, as well as those for Arun, when outlining the approach to be taken to the assessment and mitigation of any new development, in close proximity to the National Park or may impact on views into or out of it.” Additionally recommend that the original last sentence is moved to be part of supporting text.	Also raised by SDNPA Wording amended. Plan Updated
Page 74	Policy EH6	Appendix E in this policy, according to the list covers community assets and this has not been provided with the document or any map and so no comment can be provided in relation to this at present. A map or list of the intended Local Green Spaces is required before comment can be given on these and need to be consulted on.	Appendix E was available to view on-line on the Parish Council website throughout the Consultation period. A Local Green Spaces Map has been included in Appendices. Plan Updated
Page 75	Policy EH7	As the policy mentions “important” hedgerows throughout it, it is recommended that a footnote is provided to explain the definition of what this covers– it suggests that you have one or are referring to one from a specific document. Minor correction required to the third bullet point. Recommend that there is the addition of a footnote as shown with an accompanying definition: “...identified as “important” ¹ under the Hedgerows Regulations Base of page –1link to Hedgerows Regulations or most likely copy what the definition is. Minor corrections to the third bullet as follows: “...minimum length, and width and species make up...”	A footnote has been added to a document that provides the definition of “important” hedgerow, plus example of such a hedgerow in Angmering. Plan Updated

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Page 76	Policy EH7	<p>A new heading is required, as it has been omitted. Minor omission to second para. For ease a minor removal recommended. First bullet is unnecessary under the second para. In the second bullet point under the second para what is meant by “how water travels”? Number of minor changes to the last section of the policy.</p> <p>Suggests New title to be inserted: Flood Prevention</p> <p>Minor correction as follows: “...flooding in the Plan area ...”</p> <p>Following amendment “...new development planning application, the Parish...”</p> <p>First bullet should be removed in its entirety. Clarity, with possible definition needed to explain this.</p> <p>Amend last section as follows: “...required, it must be shown: Qualify What type of alternate drainage... Evidence of its effectiveness...”</p>	<p>Missing heading inserted. Suggested wording amendments agreed.</p> <p>Agree that “Qualify” be added to 1st bullet point, as the Neighbourhood Plan can not be prescriptive about this as it is the authority.</p> <p>Flooding is a major concern, hence the focus on new development assuring the community that the risk if flooding and drainage solution proposed has been thoroughly thought through.</p> <p>Plan Updated</p>
	Policy EH7	<p>Differentiates between decisions and evergreen hedgerows and also excludes gardens – this is quite a radical policy – It is assumed the intent is only for planning applications rather than a blanket TPO? Further clarification is required</p>	<p>Agreed. To clarify, section heading now reads: “Protection of Trees & Hedgerows (New Development)”</p> <p>Plan Updated</p>
Page 77	10.19	<p>What is meant by “If formed”? Explanation is required of what is meant to aid clarity.</p>	<p>Wording amended to clarify.</p> <p>Plan Updated</p>
Page 77	Policy EH8	<p>This needs further discussion with ADC</p>	<p>The wording is based on ADC's saved policy, with added strength. The policy has been validated by WSCC county archaeologist.</p> <p>See WSCC email correspondence on APC website under Neighbourhood Plan 2014-2029 Background documents; Key Documents; sub-section 9.4 Archaeology.</p> <p>No Action</p>

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Page 82	11.8	This talks of reaching the limits of Angmering’s capacity – where is the evidence this is based on? Reference to the evidence this has come from is required or should be removed.	Wording amended to . . . Angmering’s capacity, within the built up area boundary (BUAB), to accept... Plan Updated
Page 82	11.11	This mentions that this was part of the strategic allocation of the emerging plan, this has never been the case. Correction required	The site (Site 101) was included in Arun’s proposed strategic allocation. It is shown in the "Angmering Visioning Brief" produced in March 2013 to support the emerging Arun Local Plan. It was in the supporting documentation and proposed to Full Council by the Arun Local Plan Sub-committee in 2014. It was subsequently removed from the Masterplan for strategic housing east of Roundstone Way. No Change
Page 83	11.14	Has there been agreement over this? Where is the proof? Otherwise there is the potential for challenge in terms of deliverability. Evidence of agreement over the deliverability of these as referenced in this para is needed, or should be produced with any future documents.	We have not been prescriptive in the Plan as to where on the Mayflower Way site (Policy AH1) the allotments are going. There needs to be agreement between the land owners and ADC as to how the site lay-out incorporates allotment space. The Plan also allocates the field in Mayflower Way (AH2) that is owned by the Parish Council, and states that it <i>“gives the added advantage of being able to be developed as part of a larger site . . . providing flexibility on the location of amenity space”</i> . No Change
Page 85	Policy HA3	This mentions about 10 parking spaces for shoppers using the retail area, how is it intended that this will be ensured? Who would manage this – Parish, Private? Slight detail about how it is thought this will be done, otherwise potential hindrance to delivery of the site. The site does not seem to have the capacity to accommodate that number of units with parking as well as an additional 10 parking spaces for shoppers.	Policy reworded to remove specific number of parking spaces. Plan Updated

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	Appendix E	Appendix E is mentioned within the Plan to be the Open or Green Spaces but is identified here as being Assets of Community Value. Need either for additional appendices and corrections or new name and greater clarity where referenced in the plan is required.	<p>Changed heading of Appendix E from “Assets of Community Value” to “Assets of Community Value and Local Green Spaces”.</p> <p>A heading has been inserted above each section within the Appendix i.e. “Assets of Community Value” and “Local Green Spaces”.</p> <p>Plan Updated</p>
	Appendix E	Appendix E designates the Worthing Rugby Club as a Local Green Space and the Social Club as an ACV this is a strategic site and therefore can’t be –in any case – these needs to be in a policy not an appendix to have any effect. ADC welcomes the initiative of adding these buildings as assets of community value but just including a list in this document does not get it on the list. The parish council should ensure they register the buildings using the ADC procedure to mitigate any unwanted circumstances in the future. The NDP group through the parish council should seek to nominate the buildings which they wish to be listed as Assets of Community Value to make this policy viable. Please see the procedure to embark on this.	<p>The process to register the list of buildings to be listed as Assets of Community Value has already been initiated by Angmering Parish Council, following the recommended ADC procedure.</p> <p>Policy EH6 renamed: “Protection of Local Green Spaces and Assets of Community Value” and includes the following wording:</p> <p>“Proposals that will enhance the viability and/or community value of any property that may be included in the register of Assets of Community Value at Appendix E will be supported. However, proposals that result in either the loss of such a property or that incur significant harm to the economic and social viability of such a community asset will be resisted.”</p> <p>Plan Updated</p>
	Appendix G	Appendix G - ASDA and Morrison? This list needs to be discussed with ADC as some of this information is not accurate	<p>The following footnote has been added. . .</p> <p>“When this table was compiled from feedback from the community in 2012, Asda and Morrison superstores were being built in anticipation of the growth of housing in the Angmering/Littlehampton area being proposed in the emerging Arun Local Plan. The response was in anticipation of the impact of additional traffic generated by these stores on the already congested A259 at Angmering and local roads and apparent lack of funding from these developments towards dualling the A259 etc.”</p> <p>Appendix G Updated</p>

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GENERAL:			
-	-	The housing policies need to say 'at least' not up to . Housing numbers are minimums.	Plan Updated
-	-	It is advised that the entire document be checked for typographical errors as this has not been done by ADC as part of this process.	Plan has been checked for spelling and grammatical errors. Plan Updated