

Issue 1: The Duty to Co-operate (Legal Requirement) and the Council's Broad Spatial Strategy (policy 2)

1.1 *Has cooperation between Adur District Council and other nearby local planning authorities been a continuous process of engagement from initial thinking? What evidence is there of effective co-operation (NPPF paragraph 181) and of joint working on areas of common interest being diligently undertaken for the mutual benefit of neighbouring authorities (NPPF paragraph 178)? Is there a long-term commitment to co-operation?*

No comment.

1.2 *Have cross-boundary strategic priorities and matters been identified? If so are they clearly reflected in the ALP (NPPF paragraph 156)?*

No comment.

1.3 *Are any mechanisms in place to enable the unmet housing needs of the District to be met elsewhere?*

No comment.

1.4 *Is the ALP based on a sound process of sustainability appraisal and testing of reasonable alternatives, and does it represent the most appropriate strategy in the circumstances? Has the strategic site selection process been objective and based on appropriate criteria? Is there clear evidence demonstrating how and why the preferred strategy was selected?*

Our client controls land within the ownership of Sompting Estate, along with land owned by a private individual. There is an agreement between the two parties that the land can be developed in addition to an agreement with our client. The agreement includes all of the area identified within the West Sompting allocation (Policy 6). Over the last four years our client has been working with Adur District Council (ADC), relevant statutory consultees, and the local community to inform the detail of the allocation and address the recognised constraints. Site assessment and master planning work have also informed this process.

Our client supports the Council's spatial strategy and considers that it is the result of a robust exercise underpinned by the Sustainability Appraisal and Strategic Housing Land Availability Assessments. On this basis our client considers that the spatial strategy meets the tests of soundness set out in paragraph 182 of the NPPF.

1.5 *Are all the components of the Council's spatial strategy (policy 2) justified and compatible with the principles referred to in paragraph 17 of the NPPF? Will the policies and proposals in the ALP contribute to the sustainable growth of the District?*

Paragraph 17 of the NPPF sets out twelve principles to guide the planning system and plan-making. Our client considers that the Council's spatial strategy (Policy 2) adheres to these principles and provides a positive approach to development in the district, whilst recognising the significant physical and environmental constraints. These in-effect limit the ability of the plan to meet its full OAN. It is recognised that the Inspector will need to consider whether ADC have fully explored the capacity of the District and done enough in this respect.

1.6 *Is the relationship between the ALP and any future Neighbourhood Plans sufficiently clear? Do the policies of the ALP provide sufficient and appropriate 'hooks' on which to 'hang' neighbourhood plans?*

Paragraph 183 of the NPPF explains that 'Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need'. Our client supports this aspiration and will be looking to work with the Parish Council and the local community when developing the detail of its proposals for the West Sompting site. Notwithstanding this view, it is considered that paragraph 2.72 of the ALP is overly specific in its suggestion that the Neighbourhood Plan might address the detail of the 'design, layout and open spaces' within the scheme.

Discussions on the detail of any scheme should be the subject of pre-application engagement during the preparation of the planning application, to ensure that a sensible dialogue can take place, with realistic input from the local community. Our client is committed to this process at the appropriate stage in accordance with paragraph 155 of the NPPF.

Summary

Our client supports the spatial strategy set out in the ALP and has worked positively with ADC and other statutory consultees to demonstrate that the strategic allocation at West Sompting is deliverable and can achieve the quantum of development set out in Policy 6 as a minimum. Whilst our client looks forward to working with the Parish Council and local community to develop the detail of the scheme, in order to be meaningful this should take place as part of the preparation of the planning application, rather than at the allocation stage.