

Sompting Parish Neighbourhood Plan Regulation 16 Consultation responses

Representations received by Adur District Council (ADC) which were made in accordance with regulation 16 and subsequently submitted to the independent examiner under Regulation 17(d) of The Neighbourhood Planning (General) Regulations 2012.

Consultation date: 19th February 2018 to midnight 22 April 2018

Reference Number	Respondent	
1	Lancing Parish Council	Lancing Parish Council supports the Sompting Parish Neighbourhood Plan 2015-2031 as it represents how Sompting residents have decided how they wish the future of where they live and work to be developed (Council Minute 81.7/Jan/18 refers).
2	Southern Water	Having reviewed the document, we are pleased to note that our previous comments have been addressed, and I can confirm that we have no further comments to make at this stage
3	Sompting Estate	<p>Comment re: Policy 6: Farm shop/winery proposal</p> <p>4.47: agreed.</p> <p>4.48 This accurately reflects the Estate's vision and the site referred to is likely to be the best location to act as a gateway to the National Park with multiple footpaths connecting to it. Highways considerations might support this or might require a different location. On reflection, therefore, we would propose that the wording "setting the vision for the sites east of Lambleys Lane and south of the recently restored Love Lane" should be altered to "setting the vision for a site on the north side of the Sompting Bypass".</p> <p>The Minutes of the 19/2/2018 Adur Planning Committee notes that "these proposals would be inconsistent with Policies 13 and 14 of the Adur Local Plan, and potentially Policy 1 of the Sompting Neighbourhood Plan itself. It should be remembered that the parish and the Neighbourhood Plan also extend to cover that part of Sompting under the planning policy jurisdiction of the SDNPA, and outside</p>

		<p>of the Adur Local Plan area.”</p> <p>The Sompting Estate shares the local community aspirations reflected in these proposals. We accept that in the absence of site allocations, a policy exception might be required to realize them in an appropriate countryside setting. We note that there is a mechanism for potentially justifying policy exceptions within the National Park Local Plan, in the context of an Estate Plan which delivers the Purposes of the Park. We will continue to explore these ideas in a strategic context and hope to take them forward with local backing, either via SDNPA review of our emerging Estate Plan, or by a subsequent application.</p> <p>4.49 is also Supported, and we would like to comment on “The policy will also look to support enterprises that contribute to the understanding and enjoyment of the SDNP’s special qualities in any parts of the Parish.” In addition to developing the SPNP’s farm shop and winery concepts, the Estate wishes to develop ideas for enhancing local and visitor experience of the National Park here including through various kinds of holiday visitor accommodation, and a community farm operating both within and without the Park. We will during 2018-9 be seeking to develop these ideas in an Estate Plan which we will submit to SDNPA.</p> <p>Policy 2 (iv) p25 Community building We are unsure whether, with the growing success of the Harriet Johnson Centre and Village Hall (former Reading Room), a “replacement” community building as described is required; what would it be replacing? Recent presentations by Sompting Big Local and Parish Councillors have tended more to emphasise getting better value out of improving existing facilities and their use. We have also found warm support for the proposals the Sompting Estate is developing in partnership with Sustainable Sussex for ‘community farm’ facilities at the other end of the village. We believe these facility proposals represent a very beneficial way to deliver the ALP ‘community facility’ and also the SPNP objectives including community integration and countryside experience (eg 4.1 Vision, 4.3 Housing). They also provide the opportunity to involve the community in the expanded Local Wildlife Site. If the community farm facility proposals are thus supported, might it be helpful to amend Policy 2 (iv) in some way to show that support?</p>
--	--	--

4	Environment Agency	<p>Together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf</p> <p>We aim to reduce flood risk, while protecting and enhancing the water environment. We have had to focus our detailed engagement to those areas where the environmental risks are greatest.</p> <p>Flood Risk: The West Sompting strategic allocation is partially located within fluvial Flood Zones 3 and 2 of our Flood Map for Planning. These indicate a high (1 in 100 year) and medium (1 in 1000 year) of flooding from rivers, respectively.</p> <p>The draft plan maintains the Adur Local Plan's policy to allocate this area to the extension of the SNCI. There are therefore not considered to be significant risks to the proposed development from fluvial sources posed by the plan. Any subsequent planning application for the site will need a site-specific Flood Risk Assessment to demonstrate that the development is safe without increasing flood risk elsewhere, including an allowance for the impacts of climate change. The majority of the site, and all area allocated for residential use, is located within Flood Zone 1, and therefore considered to be low risk. Please note that West Sussex County Council, as Lead Local Flood Authority, are the competent authority on surface water drainage on major development sites.</p> <p>Green infrastructure: We are pleased to see and support the draft plan's requirement for a network of green infrastructure at the site. We recommend that consideration be given to the ability for this network to incorporate SuDS and aquatic habitat and corridors (e.g. ponds, wetlands, watercourse) into this network.</p>

		<p>Water Quality:</p> <p>The national Planning Practice Guidance sets out a clear hierarchy preferring a mains discharge. We are therefore pleased to see that the draft plan supports a connection of wastewater from the site to mains drainage.</p> <p>We recommend development is phased to ensure the appropriate infrastructure is in place to support growth. We advise you speak with Southern Water to understand any constraints in your local area.</p>
5	Highways England	<p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN. Having reviewed the Draft Sompting Neighbourhood Plan Consultation, we note that the Adur District Council Local Plan identifies a strategic development of 480 dwellings at West Sompting. We note that this site is included in the Sompting Neighbourhood Plan and no further housing is proposed. If further sites are subsequently identified, Highways England requests that it is kept informed for consideration of whether there would be a cumulative impact on the Strategic Road Network. Highways England also notes the aspiration for improved crossing of the A27 and requests that we are consulted early should any such aspirations be advanced.</p>
6	Mr & Mrs Hill	<p>We object to all further development in Sompting</p> <p>A further 480+ houses would create</p> <ol style="list-style-type: none"> 1. Another 1500 people (approx) 2. Another 800 cars (approx) <p>I believe the statement of more employment brought about by the creation of a vineyard is just a "red herring "designed to mislead residents, as this would take 5 years+ to establish.</p> <p>A could be argued that the building of the houses would create employment but this would only be for the duration of the project therefore "short term".</p> <p>Medical services are already stretched in the area, this is borne by the</p>

		<p>amalgamation of The Ball Tree Surgery and The Kingfisher Surgery. The above combined with the proposed development of Monks Farm (IKEA) would put an unacceptable strain on the current infrastructure which is all ready "creaking "under the strain. The addition of extra traffic created by the two developments would almost bring grid lock to the area at peak times. The "so called" experts from the Highways Agency have proposed various plans to ease the traffic flow of the A27 these proposals are just "tinkering" with the problem and offer no long term solution that only a full By Pass would bring.</p> <p>We are yet to be convinced that further new housing is required in the area as currently there seems to be no shortage of homes for sale or to let. Any form of new housing will not help the homeless or the economically deprived as they would not be able to afford them. So therefore having no affect at all on their situation. The proposals which seem to be initiated by Sompting Estates and their developers are purely a money making exercise to offload unwanted land. One must question their ethics as they could not be bothered to send a representative to a public meeting called to discuss the proposals.</p>
7	Ms Sherriff	Make sure that affordable homes go to local people. Affordable that single wage people can afford them.
8	Ms A Godley	<p>We support the SNP with modifications. However we only support 480 houses maximum and that a mix of social housing and affordable housing are built. We also want to see the same proportion of social and affordable housing built as the properties for sale are built. In other words if 100 properties are built, 30 of these must fall into the category of social and affordable housing.</p> <p>We support initiatives such as the Farm Shop and Winery which will contribute to the local economy.</p> <p>The SNP restricts the height of development to 3 storeys and this is acceptable for Sompting village.</p>
9	Thakeham Homes Ltd	<p>Conformity with the development plan: We consider that in not providing a clear indication as to how the SPNP conforms</p>

		<p>with the policies contained within the emerging South Downs National Park Local Plan, the SPNP in its current form does not meet the basic conditions as set out above. In addition, the SPNP and the accompanying basic conditions statement, dated June 2016, makes references to the emerging Adur Local Plan:</p> <p>‘The Parish Council believes the SPNP, as highlighted below, is in general conformity with all relevant policies of the saved Adur Local Plan. Although it contains a series of other policies relating to valued community assets in the village, the main role of the SPNP is to bridge the policy space between the emerging Adur Local Plan (ALP) and the West Sompting strategic allocation.’</p> <p>With paragraph 3.6 stating:</p> <p>‘Once ‘made’, the SPNP should be easily considered alongside the development plan and any other material considerations in determining planning applications.’</p> <p>The Adur Local Plan 2017 was adopted in December 2017 and therefore the NP should ensure that the correct documents are referenced when assessing conformity with the development plan. Whilst saved policies from the Adur Local Plan 1996 are still relevant for the area which is located within the SDNPA, the emerging SDNP Local Plan has undergone Regulation 19 consultation and is therefore a material consideration in relation to the SPNP. Conformity with the emerging South Downs Local Plan should be considered, as once ‘made’ the SPNP will be considered as part of the Development Plan alongside the Local Plan.</p> <p>Housing Need:</p> <p>The emerging South Downs Local Plan indicates a requirement to deliver 4,750 net additional homes over a 19-year period between 2014 and 2033, with a minimum 2,905 to be allocated within the emerging Local Plan or through Neighbourhood Plans. It is indicated that the remaining requirement is to be met through implementation of extant permissions, previous completions and a significant windfall allowance.</p> <p>The SDNP’s housing need is addressed in the emerging Local Plan under Section 7b (Strategic Policies). This has been informed by a Housing and Economic Development Needs Assessment (HEDNA) as part of the evidence base and updates the Strategic Housing Market Assessment (SHMA) in this regard. The</p>
--	--	---

		<p>HEDNA identifies an objectively assessed need of 447 homes per year for the SDNP. What is being proposed in the draft Plan is 250 dwellings per annum, a significant shortfall.</p> <p>Policy SD26 of the emerging SDLP provides an approximate spatial strategy indicating housing distribution to be accommodated through strategic and Neighbourhood Plan allocations. Whilst Sompting is overlooked in this distribution, paragraph 4 of emerging Policy SD26 states that: 'Neighbourhood Development Plans that accommodate higher levels of housing than is set out above will be supported by the National Park Authority providing that they meet local housing need and are in general conformity with the strategic policies of the development plan.' In addition to SDNPAs struggle to meet their Objectively Assessed Housing Need(OAHN), Adur also state in paragraph 2.23 of their 2017 Local Plan states that 'the Local Plan is not able to meet the full objectively assessed housing needs figure'.</p> <p>Housing Delivery (OAHN): The Adur Local Plan 2017 provides a strategic allocation for 480 dwellings at West Sompting. The SPNP acknowledges this strategic allocation and seeks to provide policies which complement the delivery of this allocation. Whilst we acknowledge that the SPNP has not sought to make housing allocations, in our view the neighbourhood plan could look to make housing allocations over and above those made within the Adur Local Plan and the emerging South Downs National Park Local Plan to contribute towards the delivery of sustainable development and meeting housing needs within the area.</p> <p>The Government published the Neighbourhood Planning: Written Statement on the 12th December 2016 which afforded significant protection to newly adopted neighbourhood plans where they had made housing allocations, stating that: 'relevant policies for the supply of housing in a neighbourhood plan, that is part of the development plan, should not be deemed to be 'out-of-date' under paragraph 49 of the National Planning Policy Framework where all of the following circumstances arise at the time the decision is made:</p> <ul style="list-style-type: none"> • This written ministerial statement is less than 2 years old, or the neighbourhood plan has been
--	--	---

		<p>part of the development plan for 2 years or less;</p> <ul style="list-style-type: none"> • The neighbourhood plan allocates sites for housing; and • The local planning authority can demonstrate a three-year supply of deliverable housing sites.' <p>The revised NPPF was published for consultation in March 2018, and seeks to ingrain the provisions made within the Neighbourhood Planning: Written Statement into national policy. Therefore, offering increased protection against development which conflicts with neighbourhood plan policies, where a 'made' Neighbourhood Plan has recently come into force and it seeks to make housing allocations. There is therefore significant benefit in Neighbourhood Plans seeking to make provision for housing should they wish to do so.</p> <p>Land west of Steepdown Road, Sompting: Availability, Suitability & Achievability: Land west of Steepdown Road, Sompting is considered to be available, suitable and achievable, and therefore deliverable in accordance with the NPPG (Paragraphs 19-21). A site location plan has been appended to this letter. It is set within a sustainable location adjacent to the built-up area, surrounded by residential development. Services and facilities in the immediate surrounding area are good, with a parade of shops located approximately 800 metres from the site, and Primary and Secondary Schools located within approximately 1km. In addition, there are bus stops located on Steepdown Road outside of the site, from which the number 7 and 7A bus routes offer frequent services to Lancing, Durrington and Salvington for commerce, employment and leisure opportunities.</p> <p>Thakeham has a proven track record for delivering schemes of a similar size and scale throughout Surrey, Sussex and Hampshire, and has the capacity to deliver the development of the site to provide much needed new homes within the next 5 years. Given the identified acute housing need within both the SDNP and Adur District, and the lack of constraints affecting this site, it is considered that there is a reasonable prospect of residential development being achieved within the area identified.</p> <p>As mentioned above, whilst we acknowledge that the SPNP does not seek to make housing allocations at present, we consider that it could make a meaningful</p>
--	--	--

		<p>contribution to housing need through further allocations in its designated area. Therefore, should the SPNP look to make housing allocations following this consultation, we wish to demonstrate within these representations that this site is available, suitable and achievable for residential development.</p>
10	Mr Wilson	<p>West Sompting development should only proceed when A27 improvement has been decided. West Sompting should have secondary access via Loose Lane connection to Willowbrook Road to ease the impact of traffic into West Street.</p>
11	Mr Prince	<p>The degree of housing proposed is utterly inappropriate to the site(s). The surrounding road(s) are already overstretched and this number of units would render the area, particularly in the Sompting village section, quite intolerable. Not to mention the affect on other services, ie medical, educational, etc.</p> <p>Complete reappraisal of the proposal.</p>
12	Mr Beach	<p>This is a badly planned scheme due in a large part to the lack of travel infrastructure in the area. As a local resident and a user of the roads around Shoreham, Sompting, Lancing, Worthing and the A27 on a daily basis, it is obvious that unless there is a Bypass of the whole area then any improvements will not be enough to cope with the extra planned housing for the area.</p> <p>1 Cut the amount of planned houses. 2 Regardless if the housing goes ahead, put a bypass around Sompting, Lancing and Worthing.</p>
13	Mr Hatton	<p>The policy to add 480 houses is likely to result in an extra 1000 cars, approximately, in the area, assuming at least 2 cars per household, which will increase the current frequency of gridlock during rush hour.</p> <p>The A27 and West Street, through Sompting village, is regularly backed up and slow moving/"stop/start", currently.</p> <p>A road infrastructure that can support the current volume of traffic, as well as the increased volume that will be created by the policy, is needed. A solution is needed before any new houses are built.</p> <p>A bypass for the A27 is needed to support the significant increase in houses/people/cars required by the policy.</p>

14	West Sussex County Council Property Services	<p>Site:- The Former Waste Transfer Site off Halewick Lane is owned by West Sussex County Council and this comment comes from the County Council as Landowner. The former waste transfer site, located in Sompting, BN15 0ND (herein referred to as the "site") has an established planning use as a Waste Management Complex. The site has been vacant since 2007. In 2011 the site was incorporated as part of the South Downs National Park. The site is circa 1.56 ha and is occupied by a large refuse destructor building and smaller outbuildings.</p> <p>There is a gas flare present on site resulting from the former landfill use of the adjacent land to the west of the site. This must be retained somewhere on site post development.</p> <p>The ground around the buildings is made of concrete and asphalt and the site is bounded by a line of trees which separate the site from the open countryside. The site sits in a bowl created by a former quarry and is to some extent sheltered from views across the south downs because of this.</p> <p>The County Council supports the proposal for a sympathetic re-development of the former waste transfer site and is currently exploring options for the re-development of the site but there are significant constraints to bringing forward a site which can act as a gateway to the SDNP as preferred in the Neighbourhood plan paragraph 5.11.</p> <p>It is currently the County Councils view that this proposal would not be viable due to the constraints and costs of re-developing a former waste processing site including the potential risk of land contamination and lack of market interest to develop this proposal. Additionally the site could not be considered as accessible by normal transport considerations which limit the re-development opportunities.</p> <p>The County Councils planning advisors have undertaken a full planning appraisal and have concluded that there is a high likelihood of ground contamination as a result of the former use on the site. A ground conditions investigation is recommended and cost of decontamination of the site factored into development appraisals for a specific use, alongside the demolition cost. In addition any development would need to consider the better concealment of the gas flare, for</p>
----	--	---

		<p>purpose of improving the amenity of the site, which has a cost implication.</p> <p>The emerging South Downs National Park Local Plan supports sustainable development, subject to addressing the policy objectives set out in strategic policies. In planning terms a number of various options currently being explored for the site could contribute to sustaining the local rural economy underpinned by sustainable development principles. The most appropriate options would however need to be tested from a viability/financial perspective.</p> <p>The County Council is currently undertaking this appraisal and would like to see a Neighbourhood plan which recognises the difficulties and constraints in bringing forward this site and allows flexibility to ensure that the overarching aim of addressing the current issues with the site can be realistically achieved.</p> <p>The planning policies indicate that a range of uses would be acceptable on the site, and the County Council would recommend that the statement be amended as follows.</p> <p>Current:</p> <p>5.11 The parish council supports the sympathetic re-development of the former waste transfer site. Although the site is located outside the built-up area boundary, the land is in close proximity to the settlement and a brownfield site. It is currently not in use and an eyesore located within the South Downs National Park. In encouraging a change of use, the intention of the parish council is to encourage the present owners and the Park Authority, and other investors, to bring forward proposals. The Parish council favours a redevelopment scheme to create a gate way to the SDNP and to encourage uses that will improve access to the park and bring vitality to an important location were the urban area of Sompting meets the national park. It would further be an asset to the local community.</p> <p>Proposed:</p> <p>5.11 The parish council supports the sympathetic re-development of the former waste transfer site. Although the site is located outside the built-up area boundary, the land is in close proximity to the settlement and a brownfield site. It is currently not in use and an eyesore located within the South Downs National Park. In</p>
--	--	---

		encouraging a change of use, the intention of the parish council is to encourage the present owners and the Park Authority, and other investors, to bring forward proposals. (end)
15	Mr Denyer	<p>We need new homes, but you must look for people to park their cars, etc. yes the facilities for shops will be good for them. The bus routes are great, but residents need to use them more often –Lancing, Worthing and Lyons Farm, larger stores.</p> <p>First of all the Ball Tree Surgery needs to be a much bigger place. Also the surgery needs more parking places. Safer route of entering and leaving Lyons Farm. The empty store next to Boots needs to be open. Use this space for Sainsbury clothes, household products or use the space for Boots body store... or even a new shoe shop; and support the Bypass.</p>
16	Mrs Fowler	Supports.
17	Ms Lawrence	<p>Paragraph 11 Policy 3: While this paragraph mentions the increased number of car it fails to identify the impact these will have on the local area i.e. West Street and the A27.</p> <p>Any cars from the new estate wanting to travel west will automatically use West Street which is already difficult to traverse due to being narrow and single lane for much of it's length.</p> <p>The A27 is also greatly congested at peak times and the new estate is likely to be finished before any improvements have been made.</p> <p>Adding what is likely to be 1000 + cars to a conservation area that is already struggling with traffic does not seem sensible or safe.</p> <p>As it is unlikely that the some sort of development will not happen I suggest reducing the amount of housing built so a lower number of cars are added to the existing problems.</p> <p>Delay the build until the A27 improvements have been made.</p>
18	Moy and Randall	We would just like to point out that we have lived in Sompting for nearly 4 years, and yet last weekend (14/04/18) was the first we heard about the Sompting Parish Neighbourhood Plan when a leaflet came through our door. Why were we given just one week's notice when this particular consultation ran from 19/02/18? We've

		had no time to look into this adequately to make informed comments.
19	Historic England	<p>I am pleased to confirm that, without prejudice to comments we may wish to make on individual planning applications, Historic England do not have any objections to any elements of the plan.</p> <p>Policy 1. We are pleased to support the requirement to maintain the strategic gap between Sompting and Worthing as an important feature that contributes to the distinct identity and character of each settlement. We feel that the gap also contributes to the rural setting of the Sompting Conservation Area, which , in our view contributes positively to its character and would be desirable to preserve or enhance. Given the requirement that ‘special attention’, which is additional to the general attention given to planning constraints, should be given to the desirability of preserving or enhancing the character or appearance of a conservation in planning decisions, we feel that the value of the green gap to the conservation area should be reflected in the policy and would, in fact, make it more robust. As such, we recommend that text is added to the policy at the end of the second paragraph to read: “ ... or the rural character of Sompting Conservation Area’s setting”.</p> <p>Policy 2 West Sompting: We support the approach of identifying character areas in which different design parameters should be enforced. These demonstrate a managed approach to the development of the area’s character and the relationship of new development with areas of established character.</p> <p>We are pleased to see the use of a clear Village and Estate Design Guide as a supporting document for implementation of the plan and its policies and recognise that the plan seeks to deliver a high quality of design on sites allocated by the district Council through carefully considered policies.</p> <p>However, we feel that bullet point i.c. is unclear in how development should achieve an acceptable relationship with the A27 in Zone 4 and would request that the examiner explore with the steering group how this might be enhanced. For example, is it desired that the building frontage should be set back, providing a green frontage to the road, or is a more active frontage, addressed by buildings, envisaged? We note that the supporting text refers to the need for a gateway feature, this would also contribute to the identity of Sompting as a distinct</p>

		settlement, as well as encouraging safer driving on the built-up area. Ideally this should be referred to in the policy if it is considered necessary for the development of this area to achieve the community's aspiration.
20	Natural England	<p>Policy 2 iii) – We welcome the inclusion of a green infrastructure policy element. As the policy map on page 38 shows one of these policy areas to be adjacent to the A27, we recommend that this policy should include a requirement to seek opportunities to link to the downs across the A27, via new green infrastructure provision (for example, by the planting of hedgerows and woodland). This would offer potential for the NP to provide or strengthen multifunctional green infrastructure, i.e. conservation at a landscape scale (as required by paragraphs 114 and 117 of the NPPF). We also recommend that some supporting text be included in the section titled 'Green Infrastructure Network', on page 28.</p> <p>Objective – Environment: We advise that the Neighbourhood plan could seek any potential to provide or strengthen multifunctional green infrastructure. This can be by using Sustainable Urban Drainage Systems in new development, or by strengthening green links into the countryside/rivers for example (as recommended in Policy 2 iii) above) for the benefit of wildlife and people. This could perhaps form part of this 'Environment' objective.</p>
21	Persimmon (by Turley)	<p>Policy 1. Support with modifications. Refer to paragraph 2.3 of submitted representation.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Policy 2. Object. Refer to paragraph 2.4 to 2.34 of submitted representation. <input type="checkbox"/> Policy 3. Object. Refer to paragraph 2.35 to 2.39 of submitted representation. <input type="checkbox"/> Policy 6. Support with modifications. Refer to paragraph 2.40 of submitted representation. <input type="checkbox"/> Policy 7. Support with modifications. Refer to paragraph 2.41 of submitted representation. <input type="checkbox"/> Paragraph 4.17 and 4.24. Comments. Refer to paragraph 2.42 to 2.43 of submitted representation. <input type="checkbox"/> Paragraph 5.9. Comments. Refer to paragraph 2.44 of submitted representation. <p>Submitted Representation:</p>

		<p>This response to the Submission Draft (June 2017) Sompting Parish Neighbourhood Plan (SPNP) is submitted by Turley on behalf of Permission Homes.</p> <p>1.2 Our client has an interest in land located to the west of Sompting (the site). This land is allocated by Policy 6 of the adopted Adur Local Plan (December 2017) (ALP). The site is also the focus of draft Policy 2 of the SPNP, which sets out number of development criteria for the site.</p> <p>1.3 This response focusses on the proposed policies of the SPNP against the requirements of the Basic Conditions set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990.</p> <p>1.4 In summary, our client embraces the initiative and positive intent of the Parish in seeking to put in place a neighbourhood plan. However, the composition of SPNP reveals there have been errors in the preparation of the Plan, especially in relation to the policies relevant to the West of Sompting Local Plan allocation.</p> <p>2.1 The following section assess the policies of the SPNP against the basic conditions contained in paragraph 8(2) of Schedule 4B to the TCPA 1990 (as amended) namely whether:</p> <ul style="list-style-type: none"> • 8(2)(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the neighbourhood plan; • 8 (2) (e) the making of the Plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area). <p>2.2 The meaning of general conformity is addressed in the National Planning Practice Guidance at Paragraph 074 Reference ID: 41-074- 20140306. It states that the following matters should be considered:</p> <ul style="list-style-type: none"> • Whether the neighbourhood plan policy or development proposal supports and upholds the general principle that the strategic policy is concerned with • The degree, if any, of conflict between the draft neighbourhood plan policy or development proposal and the strategic policy • Whether the draft neighbourhood plan policy or development proposal provides
--	--	---

		<p>an additional level of detail and/or a distinct local approach to that set out in the strategic policy without undermining that policy</p> <ul style="list-style-type: none"> • The rationale for the approach taken in the draft neighbourhood plan or Order and the evidence to justify that approach. <p>Policy 1 – Spatial Plan for the Parish</p> <p>2.3 This second paragraph of this Policy repeats the requirements of Adur Local Plan (ALP) Policy 14 and should be deleted.</p> <p>Policy 2: West Sompting</p> <p>2.4 Our client supports the recognition in the Plan of the strategic allocation at West Sompting and looks forward to working with the Parish and Adur District Council (ADC) planning officers to discuss the detail of the scheme ahead of the submission of a planning application.</p> <p>2.5 However, with reference to the Basic Conditions tests and as detailed below, there are a number of concerns regarding certain elements of this policy.</p> <p>Design Zones (criterion iii a))</p> <p>2.6 Whilst our client supports the Parish Council's aspiration to encourage an appropriate design approach, there is a concern that the detailed design zone proposals are not justified by a clear evidence base and should be deleted.</p> <p>2.7 Notwithstanding the fundamental concern regarding the inclusion of Design Zones, the current wording of the policy is too prescriptive, particularly the housing mix that is being sought in each zone. Housing mix will be more appropriately determined based on an assessment of housing need, market demand and context and surrounding character and site specific constraints and considerations. There is no indication that this element of the policy has been fully evidenced by such considerations. Furthermore, the site is likely to be delivered in phases over a number of years where housing need may change over time as detailed planning permission on individual phases is sought.</p> <p>2.8 The ALP indicated that the West Sompting site should deliver a minimum of 480 dwellings. In recognition of the ADC inability to meet its objectively assessed</p>
--	--	--

		<p>housing needs, the ALP Inspector required the inclusion of minimum housing requirement figures to ensure land is used as effectively as possible. It is noted that the SPNP incorrectly refers to the 480 dwellings as an absolute figure and not a minimum as per the ALP (SPNP paragraphs 3.13, 3.15, 4.14 refer).</p> <p>2.9 In this context, our client is progressing a planning application for 520 dwellings across the West Sompting site, which will assist in reducing the planned shortfall against identified housing needs in the District. This approach has the support of the Council as confirmed through pre-application discussions. Prescribing a design approach and housing mix in the SPNP could constrain the capacity of the site, contrary to policy 184 of the NPPF whilst also undermining the objective of the ALP and National Planning Policy Framework (NPPF) to increase housing supply.</p> <p>2.10 Our client's proposals have been subject to public consultation, pre-application consultation with the local authorities and statutory bodies and will be scrutinised through the formal planning process in due course. As part of the application submission it has been agreed with ADC that a Character Area Design Guide will be submitted for the site. It is considered that this mechanism represents an appropriate means of controlling the design and character diversity across the site.</p> <p>2.11 Notwithstanding the fundamental concerns with this policy approach, the extent of the design zones is unclear, which could potentially complicate the implementation of the policy. Paragraph 4.17 of the SPNP suggests that the '...the boundaries of these zones will be refined through discussions with the site promoters.' These discussions have not taken place. If the design zones are retained within Policy 2, greater clarity is required regarding the delineation of the zones.</p> <p>2.12 In light of the above, we consider this element policy to be overly prescriptive, unsupported by a clear evidence base and in parts inconsistent with the emerging Local Plan (and national planning policy). However, our client wishes to address design matters in a coherent and structure way, through a Character Area Design Guide.</p>
--	--	--

		<p>Nature conservation area (criterion iii a))</p> <p>2.13 There is a discrepancy between the wording of the policy text and SPNP Policies Map in relation to criterion 2 iii a. The policy text requires the establishment of a nature conservation area (which reflects the wording of the ALP), whereas the SPNP Policies Map refers to the extension to the SNCI1. The Policies Map wording in relation to criterion iii a) should be amended to 'nature conservation area'. The suggested revised wording would then align with the strategic policy in the Local Plan and would reflect the emerging application proposal include the provision of ecological / sustainable agriculture and education area to the north Cokeham Brook and a significant extension to the LWS to the south-west of the existing designation.</p> <p>Structural landscape belt (criterion iii c)):</p> <p>2.14 This element of the policy requires a structural landscape belt of a minimum 10m width within the northern, eastern and southern boundaries of the site as part of the green infrastructure network to be implemented as part of the development.</p> <p>2.15 This element of the policy goes beyond the ALP policy which requires provision a landscaped buffer alongside the western boundary of the site only and does not specify the width. Without any clear evidence (noise / landscape etc) in the SPNP to substantiate the proposed width of the buffer and its extension along the southern, eastern and northern boundaries of the site, this element of the policy should be deleted.</p> <p>Furthermore, the creation of structural landscaping to the eastern boundary of the allocation site would create unnecessary separation between the existing and proposed development and limit integration between the residential areas. The emerging planning application proposals have been designed to protected amenity of exiting residents; the requirement for the eastern landscaping is not therefore required.</p> <p>2.17 Notwithstanding the conflict with strategic policy ALP, the inclusion of a 10m landscaped buffer (including any potential offset for root protection area) has the potential to erode the developable area of the site undermining the objectives of</p>
--	--	---

		<p>local and national planning policy to make an efficient use of land and boost housing supply.</p> <p>Public Park (criterion iii d):</p> <p>2.18 Criterion iii d) seeks the establishment of a public park along part of the site to the west in the broad location as shown on the SPNP Policies Map, comprising sufficient space to include a children's play area and a recreational area. It is not clear what is meant by 'Public Park' and what its function will be.</p> <p>2.19 The current application proposals indicate new playing pitch provision, which can only feasibly be located to the west of the site in the location referred to as the 'Public Park' in the SPNP. The location of the playing pitch provision to the west of the site is reflected in the emerging planning application proposal. Without clarity on what is meant by 'Public Park' there is the potential for the uncertainty in the SPNP policy wording which may to hinder the delivery of the pitch provision and undermine the ALP.</p> <p>2.20 The SPNP policy also requires provision of children's play area and recreational area in the 'Public Park' area. This is contrary to the ALP policy which does not fix the location of this provision. This SPNP policy requirement should therefore be deleted.</p> <p>Community building (criterion iv):</p> <p>2.21 The wording of Policy 6 in the ALP requires the development to make 'provision for a community facility'. However, the SPNP policy seeks the provision of a 'replacement community building' (Turley emphasis). The SPNP should refer to a 'community facility' for consistency with the ALP. It would also appear as though this element of the Policy 2 is intended to facilitate the replacement of the Harriet Johnson Community Centre. As confirmed during pre-application discussions with ADC officer's this facility is well- used. A replacement facility is not required. Furthermore, given that Section 5 of the SPNP indicates that the existing centre will be proposed as Asset of Community Value there is an apparent internal conflict between the SPNP's stated objectives.</p> <p>2.22 The SPNP also seeks to fix the function, location and management structure</p>
--	--	---

		<p>for the facility which has the potential to undermine the strategic policy of the ALP by imposing an unnecessary rigidity into the policy approach to community provision. As per the current pre-application, the community facility will take the form a 'community farm' complex, which will include a number of community uses. The precise mix of uses is being developed in consultation with Sustainable Sussex and ADC and may include café, agri-environment education / training facilities and flexible community space. In this context, the policy and supporting text within the SPNP should draw back from the prescriptive function of the facility as it is currently unjustified and potentially undeliverable. Or, at the very least, the wording in the SPNP should be amended to 'could include rooms for community events...' to allow for greater flexibility.</p> <p>2.24 Furthermore, the location of the community facility is not fixed by the ALP. Whilst we acknowledge the suggested rationale for locating the community facility centrally within the site (within Design Zone 2), the SPNP expectations are at odds with the ALP policy and the emerging planning application proposals, which seek to locate the community facility to south of Crowshaw Recreation Ground in an area that is better suited to the facility's current proposed uses in the application proposals.</p> <p>2.25 In terms of the future ownership and management arrangements for the community facility, this will be the subject of ongoing discussions as part of (and following) determination of the planning application(s) at West Sompting. In light of our comments in relation to the function of the community facility, it is not considered appropriate to require the 'transfer' of the facility to the Parish when Sustainable Sussex and/or the Sompting Estate could be better placed to undertake this role (particularly as facility should not be regarded as a replacement for the Harriet Johnson Centre). The prescriptive policy text on the ownership arrangements within the policy is considered premature and should be deleted. Furthermore, there is no clear evidence to justify a transfer to the Parish; this can be more appropriate dealt with through the planning application process and s106, and will need to be subject to agreement of landowner and developer.</p> <p>2.26 The policy and supporting text within the SPNP should draw back from the prescriptive requirements of the facility as these are currently unjustified, potentially</p>
--	--	--

		<p>undeliverable and contrary to the strategic policy set out in the ALP. Cycle route and public footpath network (criterion v).</p> <p>2.27 Policy 6 of the ALP makes reference to the provision of a link to from the West Sompting allocation to Worthing across the Local Green Gap, and our client is committed ti working with ADC, Worthing Borough Council and West Sussex County Council to deliver this.</p> <p>2.28 However, the SPNP policy text, requires the establishment a number of routes as part of the West Sompting proposal (the routes are shown in more detail on the SPNP Policies Map), including:</p> <ul style="list-style-type: none"> (a) A North South route providing a link between the coast and the SDNP incorporating existing designated cycle routes, footpaths and bridleways; (b) A route linking the employment area on the western side of Worthing to Sompting; and (c) A safe route for cyclists and pedestrians on the western stretch of Upper Brighton Road linking with West Street. <p>2.29 There is a clear divergence between what is being sought by the ALP and the SPNP in terms of cycle and pedestrian links.</p> <p>2.30 The SPNP Policy also fails to acknowledge that the routes identified are not within the application boundary of the site, and multiple ownerships may constrain delivery. It is not therefore considered appropriate to require the provision of all new links as part of the West Sompting SPNP policy. Criterion v would be better presented as a standalone policy. A number of the links also extend to areas within the administrative boundary of Worthing (which are also outside of the SPNP boundary).</p> <p>2.31 Our client supports the aspiration to create a new development that is well linked to the existing community and local facilities. However, we question whether all of the links being sought are necessary and justified. Evidence to support the links proposed in the Plan is absent including whether the impact of delivery has been properly assessed. Policy 14 of the ALP requires the proposal to ensure coalescence between Lancing and Sompting does not occur. For example, cycle</p>
--	--	--

		<p>links across the gap, developed to County standards and including lighting to ensure user safety may lead to a perceived joining of the gap in visual terms, which would be at odds with the objective of the ALP (and potentially Policy 1 of the SPNP). The wording on the Policies Map, 'Proposed pedestrian and cycle links' is therefore overly prescriptive and may restrict for alternative (and potentially better more sensitive) routes to be considered. It is suggested that the Policies Map wording be revised to 'Indicative pedestrian and cycle links' to allow for greater flexibility.</p> <p>Retail shop (criterion vi):</p> <p>2.32 This element of the policy requires the provision of a retail shop within Design Zone 2. This requirement is not supported by the ALP Policy or any viability evidence. Were a local shop required, this should have been introduced through the Local Plan and not through the SPNP process.</p> <p>2.33 Our client's experience on similar sized residential schemes would suggest that the existing and proposed quantum of development would be unlikely to be sufficient to attract or sustain a new retail shop.</p> <p>2.34 Provision for a new shop should be deleted from the SPNP policy.</p> <p>Policy 3: Design:</p> <p>2.35 Policy 3 of the SPNP indicates that residential development proposals should 'demonstrate how the design has responded positively to the Sompting Housing and Estate Design Guide'.</p> <p>2.36 Persimmon provided representations in relation to the consultation on the Housing and Estate Design Guide (HEDG) in 2017. It is therefore disappointing the points raised in Permission's representations appear not been taken into account in the submitted version of the Guidance.</p> <p>2.37 Permission's previous representation on the HEDG is therefore still relevant and is appended to these comments (see Appendix 1). For ease of reference, a summary of the key points previously raised are set out below:</p>
--	--	--

		<ul style="list-style-type: none"> • The status of the HEDG and how it will sit within the Neighbourhood Plan and overall planning policy / guidance hierarchy is unclear. The SPNP indicates that the HEDG will be a material consideration for planning application purposes, but whether the HEDG represents planning policy or guidance is not clearly defined. This is crucial in understanding the relative weight that should be given to the HEDG as part of the determination of any application relevant to the HEDG. • The policies are overly prescriptive and are at odds with policy provisions set out in paragraphs 59 and 60 of the NPPF. • The examples in the HEDG of styles that development should follow are not justified or appropriately evidenced. • It is unclear what 'estates' Section 11 is intended to refer to – is this element aimed at West Sompting which already has a bespoke policy in the SPNP? • The document also makes reference to matters/requirements which are out of date or incorrect (see for example reference to Code for Sustainable Homes). <p>Neither national policy or the design Policy 15 or other policies in the Adur Local Plan set out specific design details/styles which are specifically deemed to be acceptable or not. The HEDG as currently worded is not in conformity with this approach.</p> <p>2.38 In addition to the above, many of the design prompts in the HEDG are focussed towards replicating the character and materials of Sompting's historic core and ignoring the design / character influences of post war development that makes up the majority of the housing stock in the area.</p> <p>2.39 In conclusion, as a formal part of the Neighbourhood Plan, the HEDG does not meet with the basic conditions test and in particular is not in general conformity with National and local plan policies nor are the requirements justified with supporting evidence.</p> <p>Policy 6: Rural Business:</p> <p>2.40 The policy is unclear regarding what would constitute a 'rural business'. In spatial terms it is our view that this should explicitly refer to business that is located outside of the built up area boundaries.</p>
--	--	---

		<p>Policy 7 Broadband:</p> <p>2.41 For reasons set out above (see Community Building Section), the reference in the policy to providing broadband access to the 'proposed new community centre' should be deleted.</p> <p>Other elements of the SPNP:</p> <p>2.42 As a general point, the evidence to substantiate many of the policy requirements in the SPNP is lacking and largely based on survey/questionnaire data and anecdotal evidence. Whilst survey data is helpful in providing a baseline understanding of local aspirations, it does not represent an empirical and objective evidence base that is required to develop planning policy that will form part of the statutory development plan. In addition, some of the evidence for the inclusion of certain policy provision refers to principles established through the now superseded Local Plan 2006 (paragraphs 4.17 and 4.24 of the SPNP for example).</p> <p>2.43 The SPNP does reflect up to date Adur Local Plan policy position. There are numerous references throughout the plan referring to the emerging ALP (which has now been adopted) and policy in the Local Plan 2006 that has been superseded. The Basic Conditions Statement (June 2016) is also based on the Pre-submission Draft of the Local Plan and superseded Local Plan 2006. The Statement should be reviewed in light of the changed policy context.</p> <p>2.44 The Community Infrastructure Levy (CIL) is no longer being progressed by ADC. References to the CIL and infrastructure spending from CIL receipts (paragraph 5.7 to 5.9 inclusive) should be deleted.</p> <p>Conclusion:</p> <p>3.1 Permission Homes support the initiative and intent shown by the Parish Council to deliver a Neighbourhood Plan. However, for the reasons set out in this representation, a number of the policies in the Submission Draft of the SPNP do not meet the basic conditions tests largely due to a failure to have due regard to national policies and a lack of general conformity with the strategic policies of the adopted Development Plan.</p> <p>3.2 In our view, a number of amendments are required to various policies in the</p>
--	--	--

		<p>SPNP in order for pass the statutory basic conditions required.</p> <p>3.3 If considered helpful, we would welcome the opportunity to discuss any of the points raised in this representation with the Parish and/or Neighbourhood Plan Inspector.</p> <p>Please accept further representations on behalf of Permission Homes in respect of the Sompting Parish Neighbourhood Plan:</p> <p>Section 5: Implementation A series of non-statutory proposals relating indirectly to planning matters are set out in Section 5 of the SPNP. Paragraph 5.5 sets out proposals for the designation a number of Assets of Community Value (ACV). It is unclear why the ACV are included within the SPNP as the designation of an ACV is subject to different procedural process to production of a Neighbourhood Plan. The inclusion of potential ACV's in the SPNP could lead to confusion, and it is recommended that this element of the plan is deleted. Notwithstanding our underlying concern regarding the inclusion of ACV's in the SPNP, the Plan lacks clarity in terms what area is being referred to in bullet point viii of paragraph 5.5 (i.e. The Sompting Paddocks land west of Malthouse Meadows, West Street); it would seems as though reference is being made to land included within the West of Sompting allocation. The National Planning Policy Framework (paragraph 184) is clear that neighbourhood plans should not seek to promote less development an set out in the Local Plan or undermine its strategic policies. Whilst the designation of this land as an ACV would need to go through a nomination process, the possibility of the Parish seeking to designate this land is concerning as it could delay (or at worst obstruct) the delivery of the strategic allocation, and undermine the proposal in the adopted Adur Local Plan.</p> <p>Further, following a review of the Community Survey, we would also question whether there is sufficient evidence to suggest the Paddocks truly are of 'particular value to the local community' as required by the Localism Act 2011 and are eligible for nomination as an ACV. Consultation regarding the inclusion of Paddocks has also been ineffective. In light of the above, it is recommended that paragraph 5.5 is deleted from the SPNP. Or, as a minimum, reference to bullet viii 'The Sompting Paddocks land west of Malthouse Meadows, West Street' is deleted.</p>
--	--	--

22	Ms Williams	<p>All sounds good on paper, but the amount of homes you suggest for this small village which still is a rat-run for the A27. It's probably going to cause mayhem as it may be another 1,000 cars etc going through the village at peak times.</p> <p>A bypass for the A27 then the rat-run would not be used.</p>
23	Adur District Council	<p>Adur District Council has worked with Sompting Parish Council in the preparation of their Neighbourhood Plan and through our role to advise and assist we have had the opportunity to comment on a number of draft versions of the Plan. The Council congratulates the Parish on the progress made so far, and is pleased to see that the majority of our previous comments have been taken on board. It is considered that the draft Sompting Parish Neighbourhood Plan does meet the basic conditions and other matters set out in paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended). Although it should be noted that it is for the Independent Examiner to confirm whether or not the Neighbourhood Plan meets the basic conditions.</p> <p>We have reviewed the submitted Neighbourhood Plan and associated Housing and Estate Design Guide, Basic Conditions statement, Equality Impact Assessment and Consultation Statement. Please find our comments below which address in the Council's view whether or not the draft Sompting Parish Neighbourhood Plan meets the basic conditions and other matters as required under paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended) and other relevant legislation.</p> <p>Since producing and submitting this Neighbourhood Plan to the District Council as the Local Planning Authority, the Parish have undertaken a further six week consultation on their Housing and Estate Design Guide (Annex E standalone document) to comply with Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 (as amended). The Parish have also used this time to undertake an Equality Impact Assessment (EqIA) of their Neighbourhood Plan.</p> <p>General Comment: Since the submission of the Sompting Parish Neighbourhood Plan to the District Council, the Adur Local Plan was found sound and adopted on 14th December 2017. This is now the development plan for that part of Sompting Parish which lies</p>

		<p>outside of the South Downs National Park and as such, the SPNP should be in general conformity with it. References in the Sompting Parish Neighbourhood Plan to the saved policies of the 1996 Adur Local Plan should therefore be deleted and reference to the Proposed Submission Adur Local Plan 2014 should be updated and amended to the Adur Local Plan 2017. Any Policy numbers referred to will also need to be updated. Map extract will also need to be addressed. This is particularly relevant to Part 3 Planning Policy Context.</p> <p>Furthermore ADC officers would welcome a discussion with representatives of Sompting Parish NP (and officers of South Downs National Park Authority) to agree which policies are to be monitored by the Local Planning Authorities, and what additional local level monitoring the Parish might want to undertake.</p> <p>Policy 1: A Spatial Plan for the Parish</p> <p>The first two paragraphs of this policy insofar as it relates to land outside of the National Park duplicate Policies 2: Spatial Strategy, 13: Adur's Countryside and Coast, and 14: Local Green Gaps of the Adur Local Plan 2017. Paragraph 043 of the Planning Practice Guidance states that duplication of the planning process should be avoided.</p> <p>Policy 2:</p> <p>Land at West Sompting was allocated for development through the Adur Local Plan 2017. Policy 6: Land at West Sompting sets out the Local Plans requirements for the site including a minimum of 480 dwellings. The site promoters have recently undertaken pre-planning consultation on their proposals.</p> <p>Paragraphs 040 and 041 of the Planning Practice Guidance highlight the importance of proportionate, robust evidence to support the choices made and the approach taken. Although we do consider that this Policy is in general conformity with Policy 6 of the Adur Local Plan 2017, we have previously advised the Parish Council that particular elements of this policy go beyond the Local Plan policy requirements and that it is unclear how these aspects of the policy are justified - namely the retail unit, specification of the proposed community building and requirement for a structural landscape belt of 10m. We are therefore unclear what evidence supports these aspects of Policy 2, and whether they are appropriate having regard to the guidance issued.</p>
--	--	--

		<p>In addition as highlighted within the text, the proposed landscape belt falls within land designated as countryside designated by the Adur Local Plan 2017. Although a public right of way across the Local Green Gap to Worthing is included in the Adur Local Plan 2017, any proposed uses or landscaping should be in broad conformity with this designation.</p> <p>In relation to the proposed community building, Policy 6: Land at West Sompting of the Adur Local Plan 2017 refers to the provision of a community facility, however this was not intended as a requirement for a new community centre. We note that the policy wording at point iv refers to a 'replacement community building'; however it is not clear what this is replacing particularly as the Harriet Johnson Centre (an existing nearby community hall and home to the Parish Council office) is included in Part 5 as a proposed Asset of Community Value. It is understood that plans are underway to redevelop and enhance existing community centres in Sompting which would mean a new community building would likely be surplus to requirements. Furthermore the proposed West Sompting development does not generate the need for a community facility of this scale.</p> <p>For information the Adur District Council Objectively Assessed Needs Study (2015) referred to on page 27 has been updated by the Adur District Council Objectively Assessed Needs Update (2016) which revises Adur's OAN to 325 dwellings per annum.</p> <p>Policy 3: This Policy makes specific reference to the Sompting Housing and Estate Design Guide. A neighbourhood plan is defined as ' a plan which sets out the policies (however expressed) in relation to the development and use of land in the whole or any part of a particular neighbourhood area specified in the plan' (Planning and Compulsory Purchase Act 2004 as amended). Using this definition it is arguable that a plan means the plan in its entirety (including any statements, annexes or additions ie 'however expressed'). The Design Guide is expressed as an annex to the Plan document (and specifically referred to in Policy 3) and therefore in the Council's opinion forms a fundamental element of it.</p>
--	--	--

		<p>The Parish Council undertook consultation with the relevant consultation bodies for a period of 6 weeks from 27 July 2017 to 18 September 2017. The comments provided to the Parish Council in relation to the Guide still applies. Where we raised significant issues we have copied these, as follows:</p> <p>The document gives the impression that all areas of the parish have similar Characteristics in terms of property style, materials, etc. The examples given appear to be from the historic core of Sompting (although this is not made clear). Given that much of the residential development within the Built Up Area Boundary of Sompting consists of postwar development, we would query whether it is appropriate to apply these principles throughout the entire Parish.</p> <p>The 'Buildings' section states that 'the developer should restrict the forming of flats, and these must not be higher than three storeys.' 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> <p>We recommend that the section titled 'Carbon Emissions' is deleted. 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.</p> <p>Policy 6: Please note that proposals to establish a farm shop or winery (within the area covered by the Adur Local Plan) would not be consistent or in broad conformity with Policy 13: Adur's Countryside and Coast of the Adur Local Plan 2017. We would also have concerns regarding the impact of this policy on Policy 14: Local Green Gaps of the Adur Local Plan 2017 (and potentially Policy 1 of the Sompting Parish Neighbourhood Plan). Please note also that the policies referred to in paragraph 4.50 are no longer part of the development plan.</p> <p>Part 5:</p>
--	--	---

		<p>Paragraph 1.4 of the Sompting Parish Neighbourhood Plan explains how Section 5 of the Plan includes a series of non-statutory proposals relating indirectly to planning matters, setting out how some policies will be implemented. However we would wish to highlight the following points:</p> <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.</p> <p>Infrastructure Projects: A decision was made by Adur District Council on 9 January 2018 not to progress the proposed Community Infrastructure Levy (CIL) for Adur, but to maintain the current s106 regime. We would therefore recommend that reference to CIL is removed.</p> <p>The Former Waste Transfer Site off Halewick Lane: The original Strategic Environmental Assessment (SEA) Screening Opinion dated 11 August 2014 recommended that an SEA of the Sompting Parish Neighbourhood Plan be undertaken. This decision was made in consultation with the South Downs National Park Authority and was based primarily on the fact that the Neighbourhood Plan at that time included a criteria based policy for employment development at a waste transfer site off Halewick Lane within the South Downs National Park.</p> <p>Following removal of this policy from the Neighbourhood Plan a revised SEA Screening Opinion was issued on the 6 May 2015. This concluded that in Adur District Council's opinion, an SEA is not required for the Sompting Parish Neighbourhood Plan.</p> <p>We note that the text here simply states 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 South Downs National Park) would need to revisit whether a SEA is required.</p>
24	WSCC (General)	The County Council have no detailed comments to make on the Neighbourhood

		<p>Plan. It is however requested that following the Adoption of the Adur Local Plan, there should be updates to ensure consistency with the now adopted Local Plan. We also understand Adur District Council will not be Adopting and Implementing CIL, so references to CIL should be removed from the document.</p>
25	South Downs National Park Authority	<p>Thank you for consulting the South Downs National Park Authority (SDNPA) on the submission draft of the Sompting Parish Neighbourhood Plan (SPNP). The SDNPA welcomes the publication of this plan, which is a result of a considerable amount of hard work by the parish council and the local community. Please pass the following comments onto the appointed independent examiner:</p> <p>Paragraph 3.5 should be updated with the latest status of the emerging South Downs Local Plan. We recommend the following text: "The South Downs National Park Authority (SDNPA) is preparing the South Downs Local Plan (SDLP) which will be the first Local Plan to plan for the National Park as a single entity. On adoption, the SDLP will replace all relevant pre-existing policies, including the saved policies of the Adur Local Plan 1996, which apply to areas within the National Park. The SDNPA consulted on the pre-submission SDLP in October – November 2017 and will submit the SDLP to government for examination in April 2018."</p> <p>It is not clear whether the first sentence of the vision refers to balancing residential needs with those of the South Downs National Park? If this is the case, we recommend the wording could be clarified to refer to the SDNP statutory Purposes: "...appreciating its current community and achieving a balance between residential needs and the statutory purposes of the South Downs National Park."</p> <p>We would request that the wording in Policy 1 is amended in line with the statutory purposes of the SDNP and should read "...will be supported provided they are small scale, and conserve and enhance the natural beauty, wildlife and cultural heritage of the area."</p> <p>Sompting Parish outside of the Park contains a significant green gap which is critical in landscape character terms and is one of many green gaps which follow key estuaries or smaller waterbodies along the southern edge of the Downs to the sea. Views through these gaps to the sea from within the Downs are highly characteristic. During consultation on the Adur Local Plan, the SDNPA highlighted</p>

		<p>that the strategic allocation of land at West Sompting is in a highly landscape and visually sensitive location. The SDNPA has therefore considered the SPNP Policy 2 for West Sompting in particular. We are pleased to see that our previous comments on references to conserving and enhancing views of and from the National Park, and a requirement for a Landscape Visual Impact Assessment, have been added to the policy.</p> <p>The green infrastructure sought through Policy 2 should reflect the local landscape character and not just provide a 'landscape buffer', which is not integrated into the fabric of the wider landscape. Reference to the scheme being informed by the local landscape within the policy wording would help to ensure this. The curved edge on the policies map looks artificial and incongruous. If the boundary for the orchard and the public park can follow a natural feature (e.g. contour, field boundary etc) this would work much better. If this is not achievable the green infrastructure at 2.iiic should extend to a field boundary or similar semi-natural/natural element of the landscape. The policy should also recognise explicitly the presence of the historic lane and retain the character of this.</p> <p>The Site of Nature Conservation Importance (SNCI) extension is supported. We would also encourage the Parish Council to consider meaningful changes to management regimes of the protected greenspaces to provide improved wildlife habitats (and other benefits). They can then better act as wildlife stepping stones through the built-up area of Sompting, which is key for climate change adaptation. We consider that Policy 2 would benefit from accompanying diagrams to clearly illustrate what is being sought in each design zone, as well as the green infrastructure and walking/cycling enhancements being sought.</p> <p>In regards to the character of housing development within the identified Design Zones, there is no reference to the architecture or typology of the adjacent areas. There is also no reference to appropriate materials being sought. These would appear to be key considerations for such a large site. It is also unclear whether the accompanying Housing & Estate Design Guide is intended to inform the design of this strategic site. If this is the intention, it should be made clearer in the policy or supporting text.</p> <p>We share and support SPNP's focus on enhanced cycle links between the sea and</p>
--	--	---

		<p>the South Downs. The A27 presents a significant barrier to access in the National Park. This is particularly true for non-motorised users (NMUs) and for communities along the coastal strip including Sompting. While there are some good NMU routes such as the Downs Link at Shoreham, other historic rights of way have been severed by the A27 and where crossings exist they are few and far between, often at grade and considered dangerous to use because of volumes of traffic. The PROW network north of A27 includes footpaths and bridleways which link directly to the South Downs Way National Trail and to other key sites such as Cissbury Ring, but accessing these from south of the A27 is difficult. The supporting text in the SPPN highlights existing issues at Busticle Lane. We recommend that the text also features other West Sompting potential crossing point improvement locations (including Dankton Lane and Church Lane - as shown on the Inset Map). There continue to be discussions amongst stakeholders on potential improvements at any of these three locations.</p> <p>We also note and welcome the Parish Council identifying improvements to cycle and pedestrian networks as a priority for investment of future CIL funding.</p>
--	--	---