

Arundel Neighbourhood Development Plan Review 2018-2031

**A report to Arun District Council on the Arundel
Neighbourhood Development Plan Review**

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Executive Summary

- 1 I was appointed by Arun District Council in August 2019 to carry out the independent examination of the Arundel Neighbourhood Development Plan Review.
- 2 The examination was undertaken by written representations. I visited the neighbourhood plan area on 4 September 2019.
- 3 The Plan includes a range of policies and seeks to bring forward positive and sustainable development in the neighbourhood area. It responds positively to changing circumstances since the Plan was initially made. There is a very clear focus on safeguarding local character and providing a context within which new dwellings can be accommodated. In the round the Plan has successfully identified a range of issues where it can add value to the strategic context already provided by the adopted Arun Local Plan.
- 4 The Plan has been underpinned by community support and engagement. It is clear that all sections of the community have been actively engaged in its preparation.
- 5 Subject to a series of recommended modifications set out in this report I have concluded that the Arundel Neighbourhood Plan Review meets all the necessary legal requirements and should proceed to referendum.
- 6 I recommend that the referendum should be held within the neighbourhood area.

Andrew Ashcroft
Independent Examiner
3 October 2019

1 Introduction

- 1.1 This report sets out the findings of the independent examination of the Arundel Neighbourhood Development Plan Review 2018-2031 (the 'Plan').
- 1.2 The Plan has been submitted to Arun District Council (ADC) by Arundel Town Council in its capacity as the qualifying body responsible for preparing the neighbourhood plan.
- 1.3 Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They aim to allow local communities to take responsibility for guiding development in their area. This approach was subsequently embedded in the National Planning Policy Framework (NPPF) 2012 and its updates in 2018 and 2019. The NPPF continues to be the principal element of national planning policy.
- 1.4 The role of an independent examiner is clearly defined in the legislation. I have been appointed to examine whether or not the submitted Plan meets the basic conditions and Convention Rights and other statutory requirements. It is not within my remit to examine or to propose an alternative plan, or a potentially more sustainable plan except where this arises as a result of my recommended modifications to ensure that the plan meets the basic conditions and the other relevant requirements.
- 1.5 A neighbourhood plan can be narrow or broad in scope. Any plan can include whatever range of policies it sees as appropriate to its designated neighbourhood area. The submitted plan has been designed to be distinctive in general terms, and to be complementary to the development plan in particular. It has a clear focus on maintaining the character and setting of the town and promoting sustainable and sensitive residential development.
- 1.6 Within the context set out above this report assesses whether the Plan is legally compliant and meets the basic conditions that apply to neighbourhood plans. It also considers the content of the Plan and, where necessary, recommends changes to its policies and supporting text.
- 1.7 This report also provides a recommendation as to whether the Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome the Plan would then be used to determine planning applications within the Plan area and will sit as part of the wider development plan.

2 The Role of the Independent Examiner

- 2.1 The examiner's role is to ensure that any submitted neighbourhood plan meets the relevant legislative and procedural requirements.
- 2.2 I was appointed by ADC, with the consent of the Town Council, to conduct the examination of the Plan and to prepare this report. I am independent of both ADC and the Town Council. I do not have any interest in any land that may be affected by the Plan.
- 2.3 I possess the appropriate qualifications and experience to undertake this role. I am a Director of Andrew Ashcroft Planning Limited. In previous roles, I have over 35 years' experience in various local authorities at either Head of Planning or Service Director level. I am a chartered town planner and have significant experience of undertaking other neighbourhood plan examinations and health checks. I am a member of the Royal Town Planning Institute and the Neighbourhood Planning Independent Examiner Referral Service.

Examination Outcomes

- 2.4 In my role as the independent examiner of the Plan I am required to recommend one of the following outcomes of the examination:
- (a) that the Plan is submitted to a referendum; or
 - (b) that the Plan should proceed to referendum as modified (based on my recommendations); or
 - (c) that the Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.
- 2.5 The context for a review of a neighbourhood plan is included in Section 3 of this report. The outcome of the examination is set out in Sections 7 and 8 of this report.

Other examination matters

- 2.6 In examining the Plan I am required to check whether:
- the policies relate to the development and use of land for a designated neighbourhood plan area; and
 - the Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one neighbourhood area); and
 - the Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.
- 2.7 I have addressed the matters identified in paragraph 2.6 of this report. I am satisfied that the submitted Plan complies with the three requirements.

3 Procedural Matters

3.1 In undertaking this examination I have considered the following documents:

- the submitted Plan;
- the Basic Conditions Statement;
- the Consultation Statement;
- the Sites Assessment Report;
- the Sustainability Appraisal report;
- the HRA technical report;
- the ADC Appropriate Assessment report;
- the Arun Local Plan Viability Study (January 2017);
- the Victoria Holland Architecture Report on 14 Fitzalan Road (August 2017);
- the WYG Built Heritage Statement on 14 Fitzalan Road (March 2018);
- the Align Building Survey report on Fitzalan Road (October 2018);
- the Town Council's responses to my Clarification Note;
- the representations made to the Plan;
- the adopted Arun Local Plan 2011-2031;
- the National Planning Policy Framework (February 2019);
- Planning Practice Guidance (March 2014 and subsequent updates); and
- relevant Ministerial Statements.

3.2 I carried out an unaccompanied visit to the neighbourhood area on 4 September 2019. I looked at its overall character and appearance and at those areas affected by policies in the Plan in particular. My visit is covered in more detail in paragraphs 5.9 to 5.16 of this report.

3.3 The Neighbourhood Planning Act 2017 identifies the circumstances that might arise as qualifying bodies seek to review made neighbourhood plans. It introduces a proportionate process for the modification of neighbourhood areas where a neighbourhood development order or plan has already been made in relation to that area.

3.4 There are three types of modification which can be made to a neighbourhood plan or order. The process involved will depend on the degree of change which the modification involves and as follows:

- minor (non-material) modifications to a neighbourhood plan or order which would not materially affect the policies in the plan or permission granted by the order. These may include correcting errors, such as a reference to a supporting document, and would not require examination or a referendum; or
- material modifications which do not change the nature of the plan or order and which would require examination but not a referendum. This might, for example, entail the addition of a design code that builds on a pre-existing design policy, or the addition of a site or sites which, subject to the decision of

the independent examiner, are not so significant or substantial as to change the nature of the plan; or

- material modifications which do change the nature of the plan or order would require examination and a referendum. This might, for example, involve allocating significant new sites for development.

3.5 Given the nature of the policies in the submitted review of the Plan I have concluded that it needs both examination and a referendum. I advised the Town Council of this decision on 9 September 2019.

3.6 The remainder of this report sets out the findings of the examination. It is a general rule that neighbourhood plan examinations should be held by written representations only. Having considered all the information before me, including the representations made to the submitted plan, I was satisfied that the Plan could be examined without the need for a public hearing. I advised ADC of this decision early in the examination process.

4 Consultation

Consultation Process

- 4.1 Policies in made neighbourhood plans become the basis for local planning and development control decisions. As such the regulations require neighbourhood plans to be supported and underpinned by public consultation.
- 4.2 In accordance with the Neighbourhood Planning (General) Regulations 2012 the Town Council has prepared a Consultation Statement. This Statement sets out the mechanisms used to engage all concerned in the plan-making process. It also provides specific details about the consultation process that took place on the pre-submission version of the Plan (November to December 2018). It captures the key issues in a proportionate way and is then underpinned by more detailed appendices. In a wider sense it is a very impressive and comprehensive document.
- 4.3 Several of the appendices are particularly helpful in the way in which they reproduce elements of the consultation documents used throughout the plan-making process. They add life and depth to the Statement.
- 4.4 The Statement sets out details of the comprehensive range of consultation events that were carried out in relation to the initial stages of the Plan. They included:
- the initial engagement with landowners;
 - the distribution of explanatory leaflets throughout the neighbourhood area;
 - the creation of a website;
 - the attendances at Farmers' Markets;
 - the use of online surveys;
 - the use of informal consultation; and
 - the meetings with specialist groups to gauge views and opinions
- 4.5 The Statement also provides details of the way in which the Town Council engaged with statutory bodies. It is clear that the process has been proportionate and robust.
- 4.6 The Statement provides specific details on the comments received as part of the consultation process on the pre-submission version of the Plan (Appendix 27). It identifies the principal changes that worked their way through into the submission version (Appendix 28). This process helps to describe the evolution of the Plan.
- 4.7 It is clear that consultation has been an important element of the Plan's production. Advice on the neighbourhood planning process has been made available to the community in a positive and direct way by those responsible for the Plan's preparation.
- 4.8 From all the evidence provided to me as part of the examination, I can see that the Plan has promoted an inclusive approach to seeking the opinions of all concerned throughout the process. ADC has carried out its own assessment that the consultation process has complied with the requirements of the Regulations.

Representations Received

- 4.9 Consultation on the submitted plan was undertaken by ADC for a six-week period that ended on 28 August 2019. This exercise generated comments from a range of organisations as follows:
- West Sussex County Council (Assets).
 - South Downs National Park Authority.
 - Southern Water.
 - Brooksland Barn.
 - Highways England.
 - Bognor Regis Town Council.
 - Environment Agency.
 - West Sussex County Council (Infrastructure).
 - The Earl of Arundel and the Norfolk Estate.
 - Renaissance Retirement Limited.
- 4.10 In addition to these representations from the various organisations, 21 representations were received from local residents. Their main focus was on the proposed development of land off Ford Road (Policy AR2).
- 4.11 Where it is appropriate to do so I make reference to the representations when I address the policies in turn in Section 7 of this report.

5 The Neighbourhood Area and the Development Plan Context

The Neighbourhood Area

- 5.1 The neighbourhood area consists of the parish of Arundel. Its population in 2011 was 4298 persons living in 2269 houses. It was initially designated as a neighbourhood area on 10 December 2012. It is an irregular area with the town of Arundel at its centre. The town and the southern part of the area falls within Arun District. The northern part of the area falls within the South Downs National Park. Other than the town of Arundel itself the neighbourhood area is predominantly a rural parish and much of its area is in agricultural use.
- 5.2 Arundel is an iconic town located to the immediate south of the South Downs. It remains a key strategic location in Sussex. It is a major bridging point over the River Arun. It is an attractive historic town that has developed around the Castle which has Norman origins. A Roman Catholic cathedral now dominates the skyline along with the Castle. The town is well-known for its heritage and its well-maintained buildings. Its historic core is an extensive designated conservation area. Its attractive and popular town centre is based around High Street and Tarrant Street. There is also a separate residential part of the town to the south of the A27 off Ford Road, Torton Hill and Canada Road.
- 5.3 The remainder of the neighbourhood area is a product of its location and its geography. The area to the south of the town is dominated by extensive meadows within the River Arun floodplain. It includes the hamlet of Tortington. The area to the north of the town has many of the characteristics of the wider South Downs area. It has several areas of woodland and provides an attractive sylvan backcloth to the town in general, and the Castle in particular.

Development Plan Context

- 5.4 The development plan covering the neighbourhood plan area is the combination of the Arun Local Plan 2011-2031 and the South Downs Local Plan 2014-2033. The former affects the bulk of the town itself and the area to the south of the town. The latter affects the northern part of the neighbourhood area.
- 5.5 Both Plans include a comprehensive range of policies for their respective areas. The Arun Local Plan identifies Arundel as a significant visitor destination. It seeks to enable development that will recognise the sustainable and historic character of the town. It does not make any strategic allocations in the neighbourhood area but expects Arundel to contribute to the overall need for new homes as identified in the Local Plan. The South Downs Local Plan contains no development proposals for that part of the neighbourhood area within its administrative area. However, it identifies the town as a gateway to the National Park.
- 5.6 For the purposes of the examination I have given particular consideration to following policies in the Arun Local Plan:

Policy SD SP1	Sustainable Development
Policy LAN DM2	The Setting of Arundel
Policy TOU SP1	Sustainable Tourism and the Visitor Economy
Policy D SP1	Design
Policy HER SP1	The Historic Environment
Policy HER DM1	Listed Buildings
Policy HER DM2	Locally Listed Buildings or Structures of Character
Policy HER DM3	Conservation Areas

In their different ways these policies get to the heart of the neighbourhood area in general and the town of Arundel in particular. They address the iconic setting of the town, its conservation and distinctive buildings, and its wider attractiveness to visitors.

- 5.7 The submitted Plan has been prepared within its wider adopted development plan context. In doing so it has relied on up-to-date information and research that has underpinned existing planning policy documents in the District. This is good practice and reflects key elements in Planning Practice Guidance on this matter.
- 5.8 It is also clear that the submitted Plan seeks to add value to the different components of the development plan and to give a local dimension to the delivery of its policies. This is captured in the Basic Conditions Statement.

Unaccompanied Visit

- 5.9 I carried out an unaccompanied visit to the neighbourhood area on 5 September 2019.
- 5.10 I drove into the neighbourhood area along the A27 from the west. This gave me an initial impression of its setting and the character. It also highlighted its connection to the strategic road system and to the other settlements along the A27.
- 5.11 I looked initially at the part of the town off Ford Road, Torton Hill and Canada Road. I saw the way in which it comprised a distinctive part of the town separate from the town centre and its historic core. I looked closely at the proposed housing allocation off Ford Road. I saw the way in which it would extend down to Priory Road to the south and how it would relate to the two components of the green infrastructure network. I also looked at the character and appearance of the existing dwellings in this part of the town. Thereafter I looked at the proposed local green space to the north of Canada Road.
- 5.12 I then spent time in and around the town centre. I saw the characteristic nature of its street pattern and the range and type of historic buildings. In doing so I saw the retail and commercial services in High Street, Tarrant Street and Queens Street. The dry and bright weather helped to create a vibrant and attractive environment as residents and visitors alike enjoyed the various facilities in the town centre.
- 5.13 I then walked up to London Road. I looked at both the Castle and the Cathedral. In both cases they offered views to the south of the town. I took the opportunity to sit in

the burial ground off London Road. The views at this point were particularly extensive and attractive.

- 5.14 I then looked at the area around Queen Street. I saw the Lido and the associated car park. Several hardy souls were enjoying a swim in the early Autumn sunshine. I then looked at the former Police Station Site. This helped me to understand Policy AR4 more fully. I saw its sustainable location within the wider setting of the town. I then walked into Fitzalan Road. I saw the former Swallow Brewery building and the proposed AR3 housing site. I then walked along the western part of Fitzalan Road to the point at which it passes under the A27. I enjoyed the relative peace and quiet of the grass verges by the River Arun.
- 5.15 In order to understand the neighbourhood area better I drove along Ford Road to Tortington and then to Ford Station. I saw the attractiveness of the agricultural landscape within the River Arun floodplain and its very different character from that of the town.
- 5.16 I finished my visit by driving out of the neighbourhood area to the north along the A284. This highlighted the relationship between the town and its wider landscape setting of the South Downs. The environment to the north of the town contrasted very significantly with that to the south along the Ford Road.

6 The Neighbourhood Plan and the Basic Conditions

- 6.1 This section of the report deals with the submitted neighbourhood plan as a whole and the extent to which it meets the basic conditions. The submitted Basic Conditions Statement has helped considerably in the preparation of this section of the report. It is a well-presented and informative document. It is also proportionate to the Plan itself.
- 6.2 As part of this process I must consider whether the submitted Plan meets the Basic Conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. To comply with the basic conditions, the Plan must:
- have regard to national policies and advice contained in guidance issued by the Secretary of State;
 - contribute to the achievement of sustainable development;
 - be in general conformity with the strategic policies of the development plan in the area;
 - be compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations; and
 - not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017 (7).
- 6.3 I assess the Plan against the basic conditions under the following headings.
- National Planning Policies and Guidance*
- 6.4 For the purposes of this examination the key elements of national policy relating to planning matters are set out in the National Planning Policy Framework (NPPF) issued in February 2019. This approach is reflected in the submitted Basic Conditions Statement.
- 6.5 The NPPF sets out a range of core land-use planning issues to underpin both plan-making and decision-taking. The following are of particular relevance to the Arundel Neighbourhood Plan Review:
- a plan led system– in this case the relationship between the neighbourhood plan and the adopted Arun Local Plan and the South Downs Local Plan;
 - delivering a sufficient supply of homes;
 - building a strong, competitive economy;
 - recognising the intrinsic character and beauty of the countryside and supporting thriving local communities;
 - taking account of the different roles and characters of different areas;
 - highlighting the importance of high-quality design and good standards of amenity for all future occupants of land and buildings; and
 - conserving heritage assets in a manner appropriate to their significance.
- 6.6 Neighbourhood plans sit within this wider context both generally, and within the more specific presumption in favour of sustainable development. Paragraph 13 of the NPPF

indicates that neighbourhoods should both develop plans that support the strategic needs set out in local plans and plan positively to support local development that is outside the strategic elements of the development plan.

- 6.7 In addition to the NPPF I have also taken account of other elements of national planning policy including Planning Practice Guidance and ministerial statements.
- 6.8 Having considered all the evidence and representations available as part of the examination I am satisfied that the submitted Plan has had regard to national planning policies and guidance in general terms. It sets out a positive vision for the future of the neighbourhood area. In particular it includes a series of policies on the scale and nature of new development. In particular it identifies sites for new residential development. The Basic Conditions Statement maps the policies in the Plan against the appropriate sections of the NPPF.
- 6.9 At a more practical level the NPPF indicates that plans should provide a clear framework within which decisions on planning applications can be made and that they should give a clear indication of how a decision-maker should react to a development proposal (paragraph 16d). This was reinforced with the publication of Planning Practice Guidance in March 2014. Paragraph ID:41-041-20140306 indicates that policies in neighbourhood plans should be drafted with sufficient clarity so that a decision-maker can apply them consistently and with confidence when determining planning applications. Policies should also be concise, precise and supported by appropriate evidence.
- 6.10 As submitted the Plan does not fully accord with this range of practical issues. The majority of my recommended modifications in Section 7 relate to matters of clarity and precision. They are designed to ensure that the Plan fully accords with national policy.

Contributing to sustainable development

- 6.11 There are clear overlaps between national policy and the contribution that the submitted Plan makes to achieving sustainable development. Sustainable development has three principal dimensions – economic, social and environmental. It is clear that the submitted Plan has set out to achieve sustainable development in the neighbourhood area. In the economic dimension the Plan includes policies for housing and employment development (Policies AR2/3/4 and AR7/8 respectively). In the social role, it includes policies on community facilities (Policy AR6) and on the town centre (Policy AR7). In the environmental dimension the Plan positively seeks to protect its natural, built and historic environment. It has specific policies on a proposed local green space (Policy AR10), on the green infrastructure network (Policy AR9) and on the former Swallow Brewery (Policy AR5). The Town Council has undertaken its own impressive assessment of this matter in the submitted Basic Conditions Statement.

General conformity with the strategic policies in the development plan

- 6.12 I have already commented in detail on the development plan context in Arun District in paragraphs 5.4 to 5.8 of this report.

- 6.13 I consider that the submitted Plan delivers a local dimension to this strategic context. The Basic Conditions Statement helpfully relates the Plan's policies to policies in the development plan. Subject to the incorporation of the recommended modifications in this report I am satisfied that the submitted Plan is in general conformity with the strategic policies in the development plan.

European Legislation and Habitat Regulations

- 6.14 The Neighbourhood Plan General Regulations 2015 require a qualifying body either to submit an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 or a statement of reasons why an environmental report is not required.
- 6.15 In order to comply with this requirement the Town Council produced a Sustainability Appraisal. Having considered the relevant guidance and taking into account the policy content of the Plan, the Town Council informed the local planning authorities that it would be preparing a Sustainability Appraisal (SA). The SA incorporated a Strategic Environmental Assessment.
- 6.16 The Appraisal comments that the objectives of the Review have the potential to deliver a series of positive sustainability effects across a range of measures. It concludes that there are especially strong sustainability effects in respect of meeting its local housing needs, sustaining the town centre and improving biodiversity. It identifies that the potential for adverse effects should be addressed in specific policy choices and wording to ensure that potential is avoided or successfully mitigated. However, the housing growth objectives will inevitably require the development of greenfield land on the edge of the town.
- 6.17 The Appraisal considered any reasonable alternatives to the proposed policies. In overall terms, the preferred option for housing allocations in Policies AR2 – AR4 are likely to lead to greater positive sustainability effects than the alternatives. In practice, the only alternative to all the other policies is that of having no policy and relying upon other development plan policies or national policy. The assessment considers that such an alternative would make no difference to the sustainability outcomes. The Appraisal concludes that the Submission Neighbourhood Plan Review presents a suitable strategy for achieving sustainable development when considered against its reasonable policy alternatives and does not have the potential for significant adverse effects.
- 6.18 The Town Council has commissioned a technical report on habitat matters to inform ADC's Appropriate Assessment of the Plan. It addressed the impact of the Plan's policies on the following European sites:
- Arun Valley SPA;
 - Arun Valley SAC; and
 - Arun Valley Ramsar site

- 6.19 The report is very thorough and comprehensive. It provides assurance to all concerned that the submitted Plan has taken appropriate account of important ecological and biodiversity matters.
- 6.20 It concludes that the allocations in Policies AR3 and AR4 are among those sites assessed earlier in the plan-making process that will not have a likely significant effect on Bewick Swans or on the associated European Sites and can therefore be screened out. However, Policy AR2 (Land off Ford Road) is one of those sites that cannot be screened out for such effects and is therefore considered further for appropriate assessment.
- 6.21 The report comments that the AR2 site was considered at the screening stage to represent a likely significant effect to functionally linked habitat. Based on aerial/roadside photography and online mapping the site is within proximity to the River Arun and a large area of associated floodplain habitat that would be suited to overwintering Bewick Swans. In addition, the site lies within the Arun Valley SSSI Impact Risk Zone 2 and within the Arun Valley SPA/ Ramsar 7.3km north. Due to the distance from the SPA and Ramsar site, the risk is therefore not high, but an impact does exist.
- 6.22 Natural England have confirmed in correspondence with the Town Council that they consider the restrictions imposed on this site in the Neighbourhood Plan Review will ensure no adverse effects on integrity of the Arun Valley SPA and Ramsar site. Given the policy framework provided in the Plan it can therefore be concluded that due to the high level of safeguarding described within Policy AR2 that development at Ford Road is not expected to pose an adverse effect on the integrity of the Arun Valley SPA/Ramsar site through its overwintering population of Bewick Swans. This will also ensure that no effect arises either individually or 'in combination' with other projects and plans.
- 6.23 ADC has also undertaken an Appropriate Assessment of the issue. It concludes that:
- there would be no significant effects to the designated sites of Arun Valley SAC and SPA/Ramsar from inclusion of the new allocation sites of the neighbourhood plan review. However, it recommends that the proposed allocations being are as equally robust in terms of the framework they provide; and
 - the sites and policies contained within the Arundel Neighbourhood Plan Review are in compliance with Part 8 of the Conservation of Habitats and Species Regulations 2017.
- 6.24 Having reviewed the information provided to me as part of the examination, I am satisfied that a proportionate process has been undertaken in accordance with the various regulations. The various reports provide the necessary levels of assurance that the Plan's proposals can be accommodated in a satisfactory way in the environment. The Appropriate Assessment work complements the findings of the HRA technical study. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with this aspect of European obligations.

- 6.25 In a similar fashion I am satisfied that the submitted Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights (ECHR) and that it complies with the Human Rights Act. There is no evidence that has been submitted to me to suggest otherwise. In addition, there has been full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known. An Equalities Impact Assessment has helpfully been prepared. On the basis of all the evidence available to me, I conclude that the submitted Plan does not breach, nor is in any way incompatible with the ECHR.

Summary

- 6.26 On the basis of my assessment of the Plan in this section of my report I am satisfied that it meets the basic conditions subject to the incorporation of the recommended modifications contained in this report.

7 The Neighbourhood Plan policies

- 7.1 This section of the report comments on the policies in the Plan. In particular, it makes a series of recommended modifications to ensure that they have the necessary precision to meet the basic conditions.
- 7.2 My recommendations focus on the policies themselves given that the basic conditions relate primarily to this aspect of neighbourhood plans. In some cases, I have also recommended changes to the associated supporting text.
- 7.3 I am satisfied that the content and the form of the Plan is fit for purpose. It is distinctive and proportionate to the neighbourhood area. In particular it responds positively to the changing circumstances that have arisen since the original Plan was first made. The wider community and the Town Council have spent time and energy in identifying the issues and objectives that they wish to be included in their Plan. This sits at the heart of the localism agenda.
- 7.4 The Plan has been designed to reflect Planning Practice Guidance (41-004-20170728) which indicates that neighbourhood plans must address the development and use of land.
- 7.5 I have addressed the policies in the order that they appear in the submitted plan. Where necessary I have identified the inter-relationships between the policies.
- 7.6 For clarity this section of the report comments on all policies whether or not I have recommended modifications in order to ensure that the Plan meets the basic conditions.
- 7.7 Where modifications are recommended to policies they are highlighted in bold print. Any associated or free-standing changes to the text of the Plan are set out in italic print.

The initial section of the Plan (Sections 1-4)

- 7.8 These initial parts of the Plan set the scene for the range of policies. They do so in a proportionate way. The Plan is presented in a professional way. It makes a very effective use of well-selected maps. A very clear distinction is made between its policies and the supporting text. It also highlights the links between the Plan's objectives and its resultant policies.
- 7.9 The Introduction comments about the development of the Plan. It also provides background information on the wider planning policy context. It helpfully comments about how the Plan will replace some of the policies in the made neighbourhood plan. It also provides technical information about the pre-submission Plan, the Sustainability Appraisal and the Habitats Regulations Assessment work.
- 7.10 Section 2 comments about the neighbourhood area and a range of matters which have influenced the preparation of the Plan. It has a particular focus on its landscape, natural and built environment and how Arundel has evolved as a place. It is a very helpful context to the neighbourhood area.

- 7.11 Section 3 comments about the planning policy context in which the Plan has been prepared. It is well-constructed. In particular it includes commentary on the Arun Local Plan, the South Downs Local Plan and the made neighbourhood plan. Paragraph 3.11 explains the intended relationship between the existing made neighbourhood plan and the submitted review.
- 7.12 Section 4 comments on the community's views on planning matters. It highlights the way in which three task groups were commissioned to look at four subject areas as part of the preparation of the Plan. It also identifies the nature of the specialist advice that was brought into the preparation of the Plan on public realm, enhancing green spaces and connectivity.
- 7.13 Section 5 describes how the Vision and the Objectives of the Plan were developed. Its key strength is the way in which the objectives directly stem from the Vision.
- 7.14 The remainder of this section of the report addresses each policy in turn in the context set out in paragraphs 7.5 to 7.7 of this report.

Policy AR1 Built Up Area Boundary

- 7.15 This policy defines the built-up area of Arundel. It is an update of the area shown in the Local Plan to incorporate the proposed allocation of land off Ford Road (as addressed in Policy AR2 below). This process also replaces Policy 2 of the made Plan.
- 7.16 I am satisfied that this approach is appropriate. It appropriately responds to changing circumstances. In particular it provides a mechanism for the application of Policies SD SP2 and C SP1 of the Arun Local Plan. The policy meets the basic conditions.

Policy AR2 Land off Ford Road

- 7.17 This policy proposes the development of 8.97 hectares of land off Ford Road for residential, community and green infrastructure uses. It is a key component of the review of the made Plan. The Plan incorporates an illustrative master plan for the site.
- 7.18 The policy includes a comprehensive package of criteria designed to ensure that the new development can be accommodated successfully and positively into its location in the town. They include criteria on:
- the developable area (a);
 - the incorporation of community uses (d);
 - vehicular and pedestrian access (g/h/i);
 - parkland and informal recreational uses (k); and
 - layout and design matters (m/n).

- 7.19 Paragraphs 5.11 and 5.12 of the Plan provide commentary about the selection of the site and its delivery respectively. On the former issue the evidence identifies clearly both how the site has been selected and how it will be incorporated within the wider

environment of the town. On the latter issue the site will contribute significantly to boosting the supply of housing land both in the District and within the town. The representation from the site owner indicates that the land is available for development. As such I am satisfied that it is capable of delivery in the Plan period.

7.20 I have taken particular account of the representations from local residents about the wider environmental impact of the development and its associated effects on the infrastructure serving the town. In the circumstances I looked at this part of the town carefully when I visited the neighbourhood area. Taking all matters into consideration I am satisfied that the policy meets the basic conditions in general terms. Properly developed the site has the ability to contribute significantly and positively towards the achievement of sustainable development in the town.

7.21 I recommend a series of modifications to the criteria included in the policy as follows:

- the incorporation of the Community Land Trust issue (in criterion c) into criterion b which more widely addresses the types of development being sought;
- the reference to a community facility being delivered on site rather than specifically being addressed in a planning application (in criterion d); and
- changing reference in criterion n. to the 'local area' to the 'neighbourhood area'.

In criterion b replace 'open market and affordable homes' with 'open market, affordable and Community Land Trust homes'

Delete criterion c.

In criterion d replace 'The planning application includes' with 'Development proposals incorporate and safeguard'

In criterion n. replace 'local area' with 'neighbourhood area'

Policy AR3 Land at Fitzalan Road

7.22 This policy proposes the allocation of land at Fitzalan Road for a residential redevelopment scheme. It anticipates a yield of 24 dwellings. The policy includes a series of criteria for the detailed development of the site.

7.23 As the Plan describes in its paragraph 5.15 the policy would replace Policy 5 of the 'made' Plan. In doing so it attempts to bring the policy up-to-date. The land affected remains the same. It is a combination of two adjoining sites at 'Blastreat' and 'Greenhurst'. The former remains occupied by an industrial use and the latter is a derelict house and its associated garden areas. The policy cross-refers to Policy AR5 in terms of managing the effects of development proposals on the former Swallow Brewery building which is located on the north-eastern boundary of the site. I comment on this matter in greater detail in paragraphs 7.35 to 7.48 of this report.

- 7.24 The policy seeks to resolve the uncertainty which existed at the time of the preparation of what is now the 'made' Plan. Since that time development proposals have come forward on the site. In addition, further work has been carried out on the significance of the former brewery building. It is on this basis that the site is now actively allocated for future development.
- 7.25 Recent planning application activity highlights active interest in the development of the site. An application for 46 sheltered apartments was submitted to ADC in March 2018. Planning permission was refused in November 2018. A subsequent appeal on that proposal is being considered at an inquiry in November 2019.
- 7.26 The policy has been well-considered. It sets out a comprehensive range of criteria that would shape the development of the site and provide appropriate safeguards. Renaissance Retirement Limited has suggested a revised version of the policy which excludes some of the submitted criteria. I have considered its commentary carefully. However, I am satisfied that the majority of the submitted criteria are both appropriate and meet the basic conditions. Nevertheless, I recommend that criterion e (on protected environmental sites) is deleted. It is unnecessary as both the HRA Technical Report and the ADC Appropriate Assessment have screened the site out in relation to any significant effects on the site concerned. I also recommend consequential modifications to the supporting text.
- 7.27 ADC suggests that the policy makes reference to the need for the delivery of affordable housing to ensure general conformity with Policy AH SP2 of its Local Plan. Plainly the detailed layout of the site and its overall viability will be a matter of further discussion. In addition, the specific house types expected in the policy may well be delivered as an element of affordable housing in any event. In this context I recommend a modification to address this matter.
- 7.28 Paragraph 5.20 of the Plan refers to earlier work on the viability of the development of the site. This is an important matter that is incorporated within paragraph 34 of the NPPF. I address the matter in further detail in paragraphs 7.28 to 7.43 of this report (on Policy AR5). However, for the purpose of this policy I recommend a modification to the supporting text which draws attention to the need for the viability of any particular scheme to be considered at the planning application stage.
- 7.29 Otherwise the policy meets the basic conditions. It positively allocates a brownfield site for residential development. The redevelopment of the site will assist in the delivery of new homes in the District in general, and in the neighbourhood area in particular. The criteria will ensure that the redevelopment of the site will respect its location within the town.

In criterion a. insert 'an appropriate level of affordable housing which includes' between 'including' and 'those'

Delete criterion e.

In paragraph 5.19 delete the sentence beginning ‘Specific attention...’

At the end of paragraph 5.20 add: ‘The viability or otherwise of individual proposals which come forward within the Plan period will be a detailed matter to be determined by the District Council based on its specific design and costs.’

Policy AR4 The Police Station, The Causeway

- 7.30 This policy identifies a reserve housing site on land occupied by the Police Station at The Causeway. Paragraph 5.21 of the Plan comments that the site is no longer operational and is currently used as a base for the Roads Policing Unit in West Sussex. Paragraph 5.20 comments on the release mechanisms for the future development of the site. It is based on the potential need to plan for additional growth or in the event that the Plan becomes out-of-date due to under delivery of housing elsewhere in the District.
- 7.31 The approach taken positively responds to the national agenda to boost the supply of new homes. As I saw from my visit it is also located in a convenient and sustainable location within the town.
- 7.32 The policy is associated with a series of criteria for the development of the site. They are both appropriate and distinctive. Criterion a. refers to the anticipated yield of the site of 12 dwellings which would include those that are suitable for first time buyers and those looking to rent their first home. ADC suggests that the criterion makes reference to the need for the delivery of affordable housing to ensure general conformity with Policy AH SP2 of its Local Plan. Plainly the detailed layout of the site and its overall viability will be a matter of further discussion. In addition, the specific house types expected in the policy may well be delivered as an element of affordable housing in any event. I recommend a modification to address this matter.
- 7.33 West Sussex County Council objects to the allocation of the site as a reserve housing site. It comments that the necessary sequential or exception tests have not been undertaken on the potential development of the site. This matter is addressed in the submitted Sites Assessment Report. It comments that the ‘flood risk vulnerability classification’ set out in Table 2 in the Planning Policy Guidance (Section 7-021) identifies police stations as ‘highly vulnerable’ to flood events but dwellings are only classed as ‘more vulnerable’. The report asserts that the change of use of this site through an allocation in the Plan will improve the current state, provided a flood risk assessment can demonstrate that a suitable scheme can be designed for the site. It is the intention to reserve the land for allocation in the later part of the Plan period, and to make the release of the land for development, subject to the provision of such an assessment.
- 7.34 On the balance of the evidence I am satisfied that the Plan has made a proportionate response to this important matter. The matter of a future site-specific flood risk assessment is included in paragraph 5.21 of the Plan. However, for clarity I recommend that this matter is directly incorporated within criterion c.

In criterion a. insert ‘an appropriate level of affordable housing which includes’ between ‘including’ and ‘those’

At the end of criterion c. add ‘by way a future site-specific flood risk assessment’

Policy AR5 Swallow Brewery – Local Heritage Asset

- 7.35 This policy has two related parts. The first identifies the former Swallow Brewery building at Fitzalan Road as a non-designated asset. The second comments on the way in which proposals for the development of the Blastreat/Greenhurst site (Policy AR3) should sustain and enhance the proposed non-designated asset.
- 7.36 Paragraphs 5.23 and 5.24 of the submitted Plan explain the Town Council's rationale behind the policy. It makes reference to a study undertaken by Victoria Holland on the historic significance and importance of the building. That study comments about the history of the building, its details and the extent to which it is a local building of character.
- 7.37 There are different elements of evidence available on this matter. Some pre-date the submission of the Plan, some have been prepared separately by the development industry and others have arisen during the examination itself. They are identified in the following paragraphs of this report.
- 7.38 Renaissance Retirement Limited has commissioned its own report on this matter (the WYG study). It concludes that the building does not meet ADC's criteria for the identification of buildings or structures of character.
- 7.39 ADC refused planning permission for a comprehensive redevelopment of the AR3 site in 2018 which included the loss of the former Swallow Brewery building. In this context Renaissance Retirement Limited submitted a report on the viability of incorporating the Swallow Brewery site into that development. The District Council commissioned its own report on the viability assessment produced by the developer.
- 7.40 During the course of the examination the Town Council submitted a proposal for the designation of the property as a building or structure of character. It has been produced by Victoria Holland Architecture. It assesses the building against the criteria identified by ADC in Policy HER DM2 of its Local Plan. It concludes that the property is worthy of designation as a building or structure of character.
- 7.41 During the course of the examination Renaissance Retirement Limited submitted a Building Survey Report of the former brewery building. In particular it includes a Schedule of Dilapidations (Appendix A).
- 7.42 In its response to the clarification note the Town Council has sought the advice of a chartered surveyor with experience of working on similar buildings elsewhere in the town. The resulting letter comments about the surveyor's role in the redevelopment of

Eagle Brewery in the centre of Arundel that had listed buildings that were in far worse condition than those found in the former Swallow Brewery building with trees growing through the masonry, spreading roofs causing outward leaning walls and cracks in the brickwork over 50mm wide. The letter concludes by commenting that the technical solutions available means that virtually any structural problem can be resolved.

- 7.43 On the balance of the evidence I am satisfied that the first part of the policy meets the basic conditions. In particular I am satisfied that the building displays the characteristics identified in the ADC criteria for such designation. Whilst the Victoria Holland Architecture and the WYG reports come to different conclusions there is an element of common ground on the historic nature of the building concerned. The WYG study concludes that, in its view, the building partially meets criteria 1,3,4 and 5 of ADC's criteria. In any event the supporting text in paragraph 5.24 of the Plan correctly identifies that this decision will ultimately one for ADC to make in its capacity as the local planning authority.
- 7.44 The second part of the policy seeks to make a clear connection between the development of the AR3 site and the retention and incorporation of the building into the redevelopment scheme in general, and to the east facing façade to Fitzalan Road in particular. The relationship between the two elements of the policy is understandable. In this context paragraph 5.23 of the Plan comments about the intended relationship between the submitted policy and Policy HER DM2 of the Arun Local Plan. Paragraph 16.3.3 of the Local Plan comments about the importance of locally listed buildings. It also comments that ADC will use its planning powers to ensure that wherever possible the special character of such buildings is protected and enhanced. The Local Plan policy itself comments that development proposals which result in the loss of such buildings will only be granted when it can be demonstrated that the building or structure cannot be put to a beneficial use or re-use. Other elements of the policy comment about the public benefits which may arise from any proposed development and the justifications that will be required.
- 7.45 I have considered this matter very carefully. In particular I have considered the extent to which Policy AR5 of the submitted Plan is in general conformity with strategic policies in the development plan in general terms, and has regard to national policy on viability in particular. On the first point the Swallow Brewery is a matter of considerable local interest. The retention of the former Swallow Brewery would be consistent with strategic policies SD SP1 (Sustainable Development), TOU SP1 (Sustainable Tourism), D SP1 (Design) and HER SP1 (The Historic Environment) of the Arun Local Plan.
- 7.46 On the second point there are different views about the effect of the measures included in the second part of the policy on the viability of the wider development of the allocated site. In particular earlier studies have had no opportunity to assess the Dilapidation Schedule as more recently prepared by Renaissance Retirement Limited. In this context I have no assurance that the delivery of such proposals would be financially viable. Section 10-002-20190509 of Planning Practice Guidance comments that '(it) is the responsibility of plan makers in collaboration with the local community, developers

and other stakeholders, to create realistic, deliverable policies. Drafting of plan policies should be iterative and informed by engagement with developers, landowners, and infrastructure and affordable housing providers.’ On the basis of the evidence submitted with the Plan and the chronology of the circumstances I am not satisfied that this has been achieved.

- 7.47 In these circumstances I recommend modifications to the second part of the policy. They have two key purposes. The first aligns the policy approach more closely to that in Policy HER DM2 Locally Listed Buildings or Structures of Character of the adopted Local Plan. The second refines the approach to the two detailed design considerations. I also recommend consequential modifications to the supporting text.
- 7.48 I also recommend detailed changes to the second design matter. In the event that the former brewery building is retained in any emerging proposals not all of the design features will necessarily be appropriate for the new elements of such developments. Nevertheless, I recommend that the deleted details are incorporated more generally within the supporting text.

In the opening element of the second part of the policy replace ‘must have..... significance of the asset’ with ‘should take account of the former Swallow Brewery building and the opportunities for its incorporation into the wider redevelopment scheme. Proposals that would result in the loss of the building will be considered on the basis of Policy HER DM2 Locally Listed Buildings or Structures of Character in the Arun Local Plan 2011 to 2031’

Thereafter replace ‘Specifically, proposals must seek to’ with ‘Subject to the viability of the proposal concerned development proposals for the wider site will be supported which would’

In b. replace ‘Comprise’ with ‘Incorporate’

In b. delete ‘most notably.....louvered openings’

At the end of paragraph 5.23 add: ‘The policy acknowledges that viability issues may have a bearing on the ability or otherwise for the former brewery building to be incorporated within emerging redevelopment proposals. As such the policy makes a cross reference to the relevant policy in the adopted Local Plan which addresses potential circumstances of this type’.

At the end of paragraph 5.24 add: ‘The second part of Policy AR5 identifies a series of design matters which should be considered in the event that the retention of the former brewery building is viable. Different proposals will be able to respond to the second identified matter in their own individual ways. However, they should consider the use of red/orange brick, weathered timber cladding, vertical boarded doors, timber-framed windows, slate windows and louvered openings’

Policy AR6 Community Facilities

- 7.49 This policy identifies a series of key community facilities. They are listed in Appendix A of the Plan. The list of 37 facilities includes schools, play areas, public houses and traditional community facilities.
- 7.50 The policy has the following related components:
- the flexibility for a change of use of such facilities where the land is no longer suited to any other community uses;
 - the flexibility for a change of use of part of a community facility where it is surplus to requirements and would not affect the viability of the primary community use; and
 - offering support for the extension of the identified facilities.
- 7.51 The identified community facilities have been well-selected. They play an important part in the social well-being of the neighbourhood area. The policy takes a correct approach in supporting the extension of such facilities and in identifying circumstances where the change of use of an existing community facility would be supported. It meets the basic conditions.

Policy AR7 Arundel Town Centre

- 7.52 This policy seeks to reinforce the vitality and viability of Arundel town centre. It relies on the definition of the town centre as identified in the Local Plan. It has three related components:
- offering support to proposals that would consolidate and strengthen the vitality and viability of the town centre;
 - not supporting proposals that would result in an excess of one type of town centre use within the town centre; and
 - supporting proposals for start-up retail businesses and other forms of pop up shops.
- 7.53 In its response to the clarification note the Town Council acknowledged that the planning process could not necessarily control a concentration of specific retail uses (such as antique shops) given the flexibility offered by the Use Classes Order. Nevertheless, I am satisfied that the approach is sufficiently flexible to allow ADC to reach a balanced judgement on planning applications within the Plan period.
- 7.54 I recommend three modifications to the policy. The first deletes the unnecessary 'encouraged' in the first component of the policy. The second replaces 'excess' with 'over-concentration' in the first paragraph of the policy. This reflects that the issue is not about the number of any one type of use but their location and dominance within the defined town centre. The third clarifies that temporary or pop-up shops may not require planning permission.

In the first paragraph delete ‘encouraged’ (first sentence)

In the first paragraph of the policy replace ‘excess’ with ‘over-concentration’

In the second paragraph insert at the beginning: ‘Insofar as planning permission is required’

Policy AR8 Business Hubs

- 7.55 This policy supports the development of new B1 business uses and live work units, or proposals to extend such uses. It specifies that they are located in the built-up area, should not lead to the loss of ground floor primary or secondary identified frontages or harm local residential amenity.
- 7.56 The policy is well-considered. In general terms it meets the basic conditions. Nevertheless, I recommend a modification to the criterion on residential amenity. As submitted, it simply refers to any such proposals not harming local residential amenity. However, it fails to identify the scale of any harm that might be acceptable. As drafted it would not allow proposals to be supported which caused any harm, irrespective of the wider acceptability of the proposal concerned. I recommend a modification to remedy this matter

In criterion iii. Insert ‘result in unacceptable’ between ‘not’ and ‘harm’.

Policy AR9 Green Infrastructure Network

- 7.57 This policy identifies a Green Infrastructure Network (GIN) of public and private open spaces, natural green spaces and rights of way and other footpaths.
- 7.58 The policy has two related components. The first supports proposals which can demonstrate how their layout, means of access and landscaping will enhance the functionality of the defined network. The second component resists proposals that would harm the function of the Network.
- 7.59 In its response to the clarification note the Town Council agreed to potential modifications that may arise as part of my consideration of two detailed representations. The first was from West Sussex County Council to remove the playing fields of the primary school from the identified Network. The second was from South Downs National Park Authority to include an additional footpath. I recommend accordingly.
- 7.60 ADC has raised concerns about the role and purpose of the policy. I have similar concerns about its structure. On the one hand the definition of a GIN is an important component of the Plan. As the Policies Maps indicate the Network extends across significant parts of the town which are important in defining its character. On the other hand, the second part of the policy offers little advice on the type of development proposals that would be supported other than that they should enhance the GIN

through their layout, access and landscaping. On this basis I recommend that the focus of the policy is shifted so that it requires that development proposals within or adjacent to the GIN should sustain and enhance the network. I also recommend a modification to the wording of the second sentence of the second paragraph.

**Replace the first sentence of the second paragraph of the policy with:
‘Development proposals on land that lies within or adjacent to the Network should sustain and, where practicable, enhance the functionality of the Network by virtue of their layout, means of access and landscape treatment’**

In the second sentence of the second paragraph of the policy replace ‘be resisted’ with ‘not be supported’

On the Inset Maps remove the Primary School Playing Field from the proposed Network and include Footpath 206.

Policy AR10 Canada Gardens Local Green Space

- 7.61 This policy proposes the designation of land to the north of Canada Gardens as a Local Green Space (LGS). In its response to the clarification note the Town Council advised that it is currently working with the District Council to deliver an open green space for the enjoyment of residents. Options being considered include an orchard and allotments.
- 7.62 Paragraph 5.35 of the Plan carries out a brief assessment of the proposed LGS against the criteria in paragraph 100 of the NPPF. I am satisfied that the proposed designation meets the criteria in the NPPF and therefore the basic conditions. In particular I am satisfied that its existing use is an important component of the green infrastructure network and that its future use as a community space will not conflict with the proposed designation as LGS.
- 7.63 The policy takes the matter of fact approach anticipated by the NPPF. I recommend a detailed modification to its wording. It will bring the clarity required by the NPPF without altering its intended purpose.

Replace ‘will be resisted’ with ‘will not be supported’.

Other matters

- 7.64 This report has recommended a series of modifications both to the policies and to the supporting text in the submitted Plan. Where consequential changes to the text are required directly as a result of my recommended modification to the policy concerned, I have highlighted them in this report. However other changes to the general text may be required elsewhere in the Plan as a result of the recommended modifications to the policies. It will be appropriate for ADC and the Town Council to have the flexibility to make any necessary consequential changes to the general text. This would sensibly include the incorporation of the retained policies of the ‘made’ Plan into the policies in

the review of the Plan. This matter is considered in more detail in the following section of this report. I recommend accordingly.

Modification of general text (where necessary) to achieve consistency with the modified policies.

The format of the Plan

- 7.65 Paragraph 3.11 of the Plan comments about the scale and nature of the review of the made Plan. It is further highlighted in paragraphs 5.3 to 5.7 of the Plan. The submitted review of the Plan concentrates on the reviewed policies. Appendix B includes the retained policies of the made Plan.
- 7.66 This approach has been both convenient and understandable for examination purposes. However, in the event that the reviewed Plan is made it has the ability to create confusion both for ADC and the development industry in their overlapping roles in the development management process. The proposed format of the Plan would require both parties to refer to two separate component parts of a neighbourhood plan. In order to remedy this situation, I recommend that a consolidated version of the neighbourhood plan is created that would incorporate the new and reviewed policies with the retained policies of the made Plan. This would bring the clarity required by the NPPF. In this context the Town Council could come to its own conclusion about the way in which it consolidated the different policy numbering sequences and the order in which the policies appeared in the Plan.
- 7.67 I also recommend consequential modifications to Paragraph 6.2 of the Plan itself.

Incorporate the policies of the reviewed Plan and the retained policies of the made Plan into a consolidate Plan.

In paragraph 6.2 replace 'and the retained and new policies of the made Plan and the Review' with 'the Neighbourhood Plan Review 2018-2031'

Detailed matters

- 7.68 ADC has recommended a series of suggested changes to the Plan. This process has been very helpful as part of the examination process. It takes account of the potential future role that any 'made' review of the neighbourhood plan will have as part of the wider development plan.
- 7.69 In some cases the suggested changes would improve the Plan. However, within the context of my role as identified in Section 1 of this report I can only recommend modifications which are necessary to ensure that the Plan meets the basic conditions. They are as follows:

Pages 23 and 24 – include page numbers (missing from the Plan)

Paragraph 5.20 – revise and update paragraph numbers (there are two 5.20)

Key Objectives Bullet point 2 – update to include reference to the levels of affordable housing required on sites of 11 or more residential units to take account of Policy AH SP2 of the adopted Arun Local Plan.

8 Summary and Conclusions

Summary

- 8.1 The Plan sets out a range of policies to guide and direct development proposals in the period up to 2031. It is distinctive in addressing a specific set of issues that have been identified and refined by the wider community. It helpfully reviews the 'made' Plan.
- 8.2 Following my independent examination of the Plan I have concluded that the Arundel Neighbourhood Development Plan Review meets the basic conditions for the preparation of a neighbourhood plan subject to a series of recommended modifications.

Conclusion

- 8.3 On the basis of the findings in this report I recommend to Arun District Council that subject to the incorporation of the modifications set out in this report that the Arun Neighbourhood Development Plan Review should proceed to referendum.

Referendum Area

- 8.4 I am required to consider whether the referendum area should be extended beyond the Plan area. In my view, the neighbourhood area is entirely appropriate for this purpose and no evidence has been submitted to suggest that this is not the case. I therefore recommend that the Plan should proceed to referendum based on the neighbourhood area as originally approved by Arun District Council.
- 8.5 I am grateful to everyone who has helped in any way to ensure that this examination has run in a smooth and efficient manner. The responses to the clarification notes were particularly helpful and informative.

Andrew Ashcroft
Independent Examiner
3 October 2019