

## **Ferring Neighbourhood Plan 2014 – 2029 Submission version**

### **Representation from South Downs National Park Authority**

The Ferring Neighbourhood Plan seeks to steer small developments to land within the built-up area boundary and close to the village centre. The alternative is seen as “*to simply abandon any chance of fulfilling the wishes of the majority of residents and to surrender yet another piece of a strategic gap to development over which the Parish Council would have no control*”. The plan does not allocate any development within the National Park (the northern area of the Parish, around Highdown Hill).

It is welcomed the final sentence in the Vision refers to conserving and enhancing the landscape of the National Park, however it doesn't make sense as a whole: i.e. “nor on the character of the village”.

#### Monitoring and review

The commitment to formally review the Plan in five years time is welcomed.

#### Housing delivery

Emerging policy SPI I Parish Housing Allocations of the Arun Local Plan 2014-2019 proposes a parish housing allocation of 50 new homes. Policies 2 and 3 will provide some 24 dwellings (gross) towards the requirement. However, two appeal sites are also expected to contribute to the housing supply – 39 dwellings at Jenkins Yard, Glenbarie Lane and 40 dwellings at Greenyers Field, Littlehampton Road. SDNPA is satisfied the plan seeks to address the housing needs of the parish.

#### Policy 2

It is unclear whether the requirement for the Ferring Community Centre to be “*open for occupation prior to the occupation of the final dwelling*” is realistic. The statutory tests for seeking planning obligations are set out in the Community Infrastructure Levy Regulations 2010 and in the National Planning Policy Framework. Planning obligations are expected to mitigate the impact of unacceptable development to make it acceptable in planning terms and para. 173 of the NPPF states “the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.”

Even if all other criteria are met and the site is suitable in relation to Local Plan and national planning policy, its delivery would hinge on an unrelated site - the Community Centre. The requirement to deliver the community centre upfront is on top of the requirement to reprovide the allotments – clearly a pre-requisite for this scheme to take place. It is appreciated a viability assessment has been undertaken but at this time, the provision of “a larger and better located allotments site” and the effect this may have on the residual value cannot reliably be established. (CRTBO para. 6.3.8 and 6.3.10) Section 106 obligations (in contrast to Community Infrastructure Levy) cannot normally be used to fund generalised infrastructure not related to an allocated site.

#### Policy 6

The references to appropriate screening taking into consideration the surrounding landscape character are welcomed. Para. 4.28 refers to the surrounding landscape character, however the Plan should cross-refer to evidence where this is already described i.e. “Littlehampton and Worthing

fringes and Worthing and Adur fringes SCI1/SCI3” of the West Sussex Land Management Guidelines and landscape character assessments prepared by Arun District Council.

Policy 8 typo in third paragraph – word proposals appears twice.

#### Proposal 4

The register is not created by the Local Planning Authority as it is not Planning legislation.

#### Community Right to Build Orders

The sites are located outside the National Park. There are no comments to make in addition to the general comment relating to deliverability (Policy 2 above).