

ANGMERING NEIGHBOURHOOD PLAN 2014-2029

A Report to Arun District Council
of the Examination into the Angmering Neighbourhood Plan

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1. Introduction

The Neighbourhood Plan

This Report provides the findings of the examination into the Angmering Neighbourhood Plan (referred to as the Neighbourhood Plan).

Neighbourhood planning provides communities with the ability to establish their own policies to shape future development in and around where they live and work.

“Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need.”
(Paragraph 183, National Planning Policy Framework)

Angmering Parish Council is the *qualifying body*¹ responsible for the production of this Neighbourhood Plan. This is in line with the aims and purposes of neighbourhood planning, as set out in the Localism Act (2011), the National Planning Policy Framework (2012) and Planning Practice Guidance (2014).

Angmering Parish Council established a Neighbourhood Plan Steering Group to lead on the production of the Neighbourhood Plan. The Neighbourhood Plan was named as one of neighbourhood planning’s national “front runners” and as such, is one of the earliest neighbourhood plans to come forward in Sussex.

This Examiner’s Report provides a recommendation as to whether or not the Neighbourhood Plan should go forward to a Referendum. Were it to go to Referendum and achieve more than 50% of votes in favour, then the Plan would be *made* by Arun District Council. The Neighbourhood Plan would then be used to determine planning applications and guide planning decisions in the Angmering Neighbourhood Area.

¹The qualifying body is responsible for the production of the Plan.

² Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990.

³Neighbourhood Planning (General) Regulations 2012.

Role of the Independent Examiner

I was appointed by Arun District Council, with the consent of Angmering Parish Council, to conduct an examination and provide this Report as an Independent Examiner. I am independent of the qualifying body and the local authority. I do not have any interest in any land that may be affected by the Neighbourhood Plan and I possess appropriate qualifications and experience. I am a chartered town planner and am an experienced Independent Examiner of Neighbourhood Plans. I have extensive land, planning and development experience, gained across the public, private, partnership and community sectors.

As the Independent Examiner, I must make one of the following recommendations:

- a) that the Neighbourhood Plan should proceed to Referendum, on the basis that it meets all legal requirements;
- b) that the Neighbourhood Plan, as modified, should proceed to Referendum;
- c) that the Neighbourhood Plan does not proceed to Referendum, on the basis that it does not meet the relevant legal requirements.

If recommending that the Neighbourhood Plan should go forward to Referendum, I must then consider whether or not the Referendum Area should extend beyond the Angmering Neighbourhood Area to which the Plan relates.

In examining the Plan, I am also required, under Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990, to check whether:

- the policies relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of Section 38A of the Planning and Compulsory Purchase Act (PCPA) 2004;
- the Neighbourhood Plan meets the requirements of Section 38B of the 2004 PCPA (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);
- the Neighbourhood 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.

Subject to the contents of this Report, I am satisfied that all of the above points have been met.

Neighbourhood Plan Period

A neighbourhood plan must specify the period during which it is to have effect. The plan period, 2014-2029, is clearly set out within the Neighbourhood Plan title. There are further references to “the next 15 years” and “the period up to 2029” in the Introduction.

Taking the above into account, I confirm that the Neighbourhood Plan satisfies the relevant requirement in this regard.

Public Hearing

According to the legislation, *when the Examiner considers it necessary* to ensure adequate examination of an issue, or to ensure that a person has a fair chance to put a case, then a public hearing must be held.

However, the legislation establishes that it is a general rule that neighbourhood plan examinations should be held without a public hearing – by written representations only.

Further to consideration of the written representations submitted, I confirmed to Arun District Council that I was satisfied that the Angmering Neighbourhood Plan could be examined without the need for a Public Hearing.

From consideration of the evidence before me, I am satisfied that people have had a fair chance to put a case, whether in support of the Neighbourhood Plan, in objection to it, or whether simply providing general comments about it.

2. Basic Conditions and Development Plan Status

Basic Conditions

It is the role of the Independent Examiner to consider whether a neighbourhood plan meets the “basic conditions.” These were *set out in law*² following the Localism Act 2011. In order to meet 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 for the area;
- be compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations.

I have examined the Neighbourhood Plan against all of the basic conditions above.

EU and ECHR Obligations

The Basic Conditions Statement submitted with the Neighbourhood Plan states that it does not breach, and is compatible with, all European obligations.

I am satisfied that the Neighbourhood Plan has regard to fundamental rights and freedoms guaranteed under the ECHR and complies with the Human Rights Act 1998 and there is no substantive evidence to the contrary.

There are no designated European sites in close proximity to the Neighbourhood Area. A full Habitat Regulations Assessment (HRA) screening report was not required as there would be no harmful impacts to any designated European sites resulting from the Neighbourhood Plan.

The Neighbourhood Plan allocates land for development. The allocation of development land comprises one of the circumstances, referred to by the Planning Practice Guidance, whereby a strategic environmental assessment (SEA) *may* be required.

With regards SEA, Planning Practice Guidance establishes that *the local planning authority must decide whether the draft neighbourhood plan is compatible with EU regulations.*

² Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990.

The qualifying body submitted a request for a formal screening opinion from Arun District Council. Arun District Council considered whether an environmental assessment of the Neighbourhood Plan was required. Further to consideration of all of the information relating to the Neighbourhood Plan, Arun District Council determined “...that an environmental assessment is not required of the Angmering Neighbourhood Plan.”

An objection to the Neighbourhood Plan suggests that it “...should be subject to a SEA to ensure it is fully robust and not vulnerable to challenge...” However, no substantive evidence is provided to demonstrate that the Neighbourhood Plan breaches, or is not compatible with European legislation. Rather, it has been demonstrated that Arun District Council has, with regard to the approach set out in Planning Practice Guidance, determined that the Neighbourhood Plan is compatible with EU regulations.

I note that no concerns with regards European obligations have been raised by the South Downs National Park Authority, by Natural England, by the Environment Agency or by English Heritage.

Taking all of the above into account, I am satisfied that the Neighbourhood Plan is compatible with EU obligations and that it does not breach, nor is in any way incompatible with the ECHR.

3. Background Documents and Angmering Neighbourhood Area

Background Documents

In undertaking this examination, I have considered each of the following documents in addition to the examination Version of the Angmering Neighbourhood Plan:

- National Planning Policy Framework (The Framework) (2012)
- Planning Practice Guidance (2014)
- Town and Country Planning Act 1990 (as amended)
- The Localism Act (2011)
- The Neighbourhood Planning Regulations (2012)
- Arun District Council Local Plan (Adopted 2003)
- Basic Conditions Statement
- Consultation Statement
- Appendices to the Angmering Neighbourhood Plan

Also:

- Representations received

In addition, I spent an unaccompanied day visiting the Angmering Neighbourhood Area.

Angmering Neighbourhood Area

The Angmering Neighbourhood Area is different to that of the Parish boundary in that it excludes land within both the Parish and the South Downs National Park. There is a Plan on page 4 of the Neighbourhood Plan showing various boundaries, but this is unclear. For example, its Key indicates that land in other Parishes and towns falls within the Neighbourhood Area; and its most distinctive feature – a red line boundary – does not relate to the Neighbourhood Area.

Further to the above, I recommend that the Plan on page 4 is modified as follows:

- **Use the red line to distinguish the Neighbourhood Area boundary**
- **Use a different type of boundary (dotted or a less distinctive colour) to distinguish the Parish boundary, or “The Rabbit”**
- **Retain the green shading to show the South Downs National Park**

- **If retaining other boundaries, ensure that these do not detract from, or could be confused with, the three main features above**

Further to an application made by the Parish Council, Arun District Council approved the designation of Angmering as a Neighbourhood Area on 10 December 2012.

This satisfied a requirement in line with the purposes of preparing a Neighbourhood Development Plan under section 61G (1) of the Town and Country Planning Act 1990 (as amended).

4. Public Consultation

Introduction

As land use plans, the policies of neighbourhood plans will become the basis for planning and development control decisions.

Legislation requires the production of neighbourhood plans to be supported by public consultation. Successful public consultation enables a neighbourhood plan to reflect the needs, views and priorities of the local community. It can create a sense of public ownership, help achieve consensus and provide the foundations for a successful 'Yes' vote at Referendum.

Angmering Neighbourhood Plan Consultation

Angmering Parish Council submitted a Consultation Statement to Arun District Council.

In order to meet the requirements of the neighbourhood planning *regulations*³, a Consultation Statement should set out who was consulted and how, together with the outcome of the consultation. Whilst the Consultation Statement itself is brief, it references numerous Appendices submitted alongside it. The full and relevant facts relating to consultation can be gleaned from the Consultation Statement and its Appendices.

It is clear from all of the material associated with the Neighbourhood Plan that a tremendous amount of consultation took place over a considerable period of time. I note that prior to being designated a Neighbourhood Area, the Parish Council had established Working Groups to undertake a variety of background work and consultation. This included Open Days, training sessions and a community questionnaire; and provided significant background material for the Neighbourhood Plan.

In October 2012, a Housing Needs survey was undertaken and 871 of 3,571 survey forms were returned. Prior to the production of a first draft pre-submission document, meetings were held with community groups, developers, consultants and landowners. Meetings were also held with Arun District Council and West Sussex County Council.

³Neighbourhood Planning (General) Regulations 2012.

Evidence is provided to demonstrate that people were kept well informed of events and progress throughout this time, via the Parish Newsletter, delivered to every household and available in the Parish Office and Library; and via the Parish Council's website.

In April 2014, a Pre-Submission document was published and the associated consultation period was supported by leaflets, emails, posters, distribution of hard copies, a school visit, drop-in sessions and Open Days, which were attended by around 100 people.

Comprehensive summary tables have been produced to demonstrate how the comments received during consultation were taken into account⁴.

The Consultation Statement and its supporting information provides evidence to demonstrate that, throughout the plan-making period, there was sustained communication, whereby people were continually updated on the progress of the plan. All relevant stages, meetings and events were well publicised.

It is evident that public consultation formed an essential part of the production of the Angmering Neighbourhood Plan. The audit trail provided demonstrates that consultation was ongoing, transparent and widely publicised. There were plentiful opportunities for comment and comments were duly considered and reported.

The consultation undertaken is reflective of the significant efforts made by all involved in the production of the Neighbourhood Plan. I am satisfied that the consultation process was significant and robust.

⁴ I note that these are referred to in the Consultation Statement as Appendix G, but relate to Appendices R and S in the information before me.

5. The Neighbourhood Plan – Introductory Section

Where modifications are recommended, they are presented as bullet points and highlighted in bold print, with any proposed new wording in italics.

Please note that some recommended modifications may require subsequent changes to be made to paragraph and Policy numbering, as well as to the introductory Objective/Index boxes and the List of Plan Policies.

The policies of the Neighbourhood Plan are considered against the basic conditions in Chapter 6 of this Examiner’s Report. In this Chapter, I consider the Introductory Section of the Neighbourhood Plan. I make recommendations aimed at making it a clearer and more user-friendly document.

Introduction

The Contents page is clear and helpful.

The Foreword is quite long and includes information in the final two paragraphs that is only appropriate to a consultation version of the Plan. Whilst I would recommend that the Foreword be shortened to one or two paragraphs, this is not an essential requirement.

The first two pages of the Introduction are useful. I recommend that Paragraph 1.6 is modified to properly reflect legislative requirements:

- **Para 1.6 line 3, change “be in line with” to “*have regard to*”**

Paragraph 1.11, 1.12 and 1.18 refer to an emerging planning document. This introduces unnecessary confusion, as the emerging Arun Local Plan is simply that – its draft policies are not adopted and do not form part of the development plan for the area. I recommend the following modification:

- **Para 1.11, delete “and the emerging Arun Local Plan.”**
- **Delete Paras 1.12 and 1.18**

I note above that the Plan on page 4 is confusing and incorrect.

- **Change Plan on page 4 as per previous recommendations**

The Plan Preparation Process Section is not much shorter than the Consultation Statement. There is no need to repeat the information contained in the Consultation Statement. I recommend the following:

- **Delete Paras 1.20 to 1.29.**
- **Start Para 1.30 “*This Neighbourhood Plan has emerged from major, sustained community consultation. Consultation details...*”**

The Neighbourhood Plan needs to be compatible with European obligations. It is not necessary, and adds nothing to the document, to include reference to a Strategic Environment Assessment not being required. Paras 1.33 and 1.34 refer to sustainable development and are informative.

- **Change sub-title to “*Sustainable Development*”**
- **Delete paragraph 1.32**

Paragraph 1.35 does not form a policy in the Neighbourhood Plan and appears as a speculative comment.

- **Delete Para 1.35**

The next two paragraphs simply repeat what is already set out by the Contents.

- **Delete Paras 1.36 and 1.37**

However, the final paragraph provides an important reference point. It refers to the Evidence Base to the Neighbourhood Plan. This comprises comprehensive and relevant information and as such, the reference is valuable.

- **Introduce new sub-title above Para 1.38, “*Neighbourhood Plan Evidence Base*”**

About Angmering

I am conscious that, at 90 pages, the Neighbourhood Plan is very long. Whilst there are no rules about how long or short a neighbourhood plan should be, it is a concern that the Neighbourhood Plan Policies are not reached until page 40. In effect, nearly half the document comprises background information.

I find that the result of the above is to provide a degree of imbalance to the Neighbourhood Plan, whereby its Policies are not afforded appropriate primacy. I consider that some of the recommendations in this part of the Report tackle this matter.

The history of Angmering, set out on pages 9-12 is interesting and distinctive to what is an area rich in history. The inclusion of photographs and plans helps to break up the text. Whilst this section could perhaps be shortened, it is not necessary to do so.

However, pages 13 to 25 of the Neighbourhood Plan, entitled “Angmering Today” is overly long. It comprises lengthy summaries of information taken from the Evidence Base. I have already emphasised the reference to the Neighbourhood Plan’s Evidence Base above. There is no need to try and reproduce large swathes of evidence in the Neighbourhood Plan.

- **Delete pages 13 to 25 and replace with a revised “Angmering Today” section, preferably comprising no more than 3 pages. This can summarise any key points from those pages.**

Pages 26 and 27 are interesting, informative and provide very useful background information relating to the character of Angmering. The information provided is concise and distinctive to the Neighbourhood Plan. It emphasises the importance of local character and its inclusion enhances the Neighbourhood Plan.

Similarly, the background information relating to Constraints and Opportunities, together with the related “Map” (although a Map should have a north sign and scale, it may be better to refer to this as a Plan, but this is not essential), provides a distinctive and useful addition. I consider it to be an innovative and ground-breaking neighbourhood planning approach whereby useful, locally relevant, non-policy information is provided in a succinct, well-presented manner.

Just one modification is recommended to pages 29 and 30. There is reference to “Local Gaps” forming part of an emerging planning document and the Local Gaps shown on the related Map do not relate to the Local Gaps in the (adopted) Arun Local Plan.

- **Remove reference to “Local Gaps” on page 29 and remove the Local Gaps shown on the plan on page 30**

Vision Statement and Objectives

This final part of the Introduction sets out the Neighbourhood Plan's Vision and Objectives. It demonstrates, with succinctly presented evidence, how these have emerged from the consultation process. It presents an appropriate section to lead into the Policies of the Neighbourhood Plan.

This section ends with a useful note setting out how the Neighbourhood Plan will be monitored and reviewed.

The Neighbourhood Plan – Policies

Tables at the beginning of each Policy section provide a direct link between the Neighbourhood Plan's Policies and its Objectives. Policies are clearly set out in shaded boxes, preceded by supporting information. This is a helpful approach.

Housing

Policy HD1: Built-up Area Boundary

The opening paragraph of Policy 1 provides rather confusing background information rather than appropriate policy text. It refers to an emerging planning document and in so doing, follows on from paragraph 6.4. It detracts from the Policy:

- **Policy HD1, delete first paragraph**
- **Delete paragraph 6.4**

The first bullet point of Policy HD1 is in general conformity with Policy GEN2 of the Arun Local Plan, which directs development to built-up areas. It also has regard to the Framework, which recognises the importance of taking account of the different roles and character of different areas, and promoting the vitality of urban areas (para 17).

The second bullet point refers to an emerging planning document and to other policies in the Neighbourhood Plan. It is confusing and unnecessary. Consequently, it fails to have regard to the Framework, which requires policies to provide a clear indication of how a decision maker should react to a development proposal (para 154).

- **Policy HD1, delete second bullet point**

Policy HD2: Parish Housing Allocation

The Neighbourhood Plan's Housing Objective refers explicitly to providing for a minimum of 100 new homes during the plan period. The wording of Policy HD2 fails to reflect this.

- **Policy HD2, change the first line to read *"In order to provide for at least 100 new homes during the plan period 2014-2029..."***

The Policy includes a “conformity reference.” Whilst helpful at consultation stage, this is confusing and detracts from the Policy itself.

- **Delete ‘(Conformity reference...47)’**

Taking the above into account, Policy HD2 allocates land for at least 100 new homes. Development in the Neighbourhood Area is not capped and there is no maximum housing number. In this way, the Neighbourhood Plan incorporates flexibility and provides for sustainable growth. The allocations have emerged through an assessment against sustainability criteria. I also note above that the Neighbourhood Plan has, itself, emerged through robust consultation.

Taking all of the above into account, Policy HD2 has regard to national policy’s presumption in favour of sustainable development and contributes to the achievement of sustainable development.

An objection to the allocations has been presented to suggest that two of the three allocations are “undeliverable.” The Bramley Green South site is allocated in the Arun Local Plan and has not yet been developed. This could be for any number of reasons and does not necessarily equate to the site being undeliverable. With regards the same site, “potential contamination issues” are not the same thing as defined contamination issues that render the site undeliverable.

Part of the Chandlers site falling within Flood Zones 2 and 3. However, this in itself is not a factor that makes the site undeliverable or means that it should not be allocated. Furthermore, the site is brownfield and is in a sustainable location – factors taken into account in the detailed assessment of sites carried out and consulted upon as part of the plan-making process. It is clear from the supporting evidence to the Neighbourhood Plan and the later Policy relating to the Chandlers site, that the potential for some flood risk on part of the site has been taken into account by plan-makers. This has regard to the Framework’s requirement for taking flood risk into account (para 99).

There is no substantive evidence to demonstrate that the three allocated sites cannot be delivered or should not be allocated. Evidence has been presented to demonstrate that Policy HD2 has regard to that part of the Framework which enables local people to get the right types of development for their community (para 184).

Representations have been received suggesting that the proposed housing provision in the Neighbourhood Plan is insufficient for Angmering. However, I note above that the Neighbourhood Plan does not seek to place a cap on the number of homes to be built in the Neighbourhood Area. Rather, it helpfully allocates land for the provision of more than 100 new homes.

Representations to the Neighbourhood Plan also include an objection based on “conflict with the policies of the emerging replacement Local Plan.” Rather than go

into detail on this matter, I simply refer this objector to the basic conditions fundamental to neighbourhood planning. For clarity, these are set out earlier in this Report.

Taking all of the above into account, Policy HD2 has regard to the Framework and contributes to the achievement of sustainable development. It meets the basic conditions.

Policy HD3: Housing Mix

Much of the supporting information for Policy HD3 is based on an emerging strategic planning policy. This information forms the basis for a highly prescriptive Policy, whereby the proportion of the specific size of dwellings on any scheme for more than six dwellings is identified.

As a consequence of the above, I am concerned that Policy HD3 fails to have regard to the need to be sufficiently flexible to take account of changing market conditions over time. For example, the Policy is so inflexible that it couldn't actually be achieved in relation to proposals for between 6 and 9 houses.

However, I acknowledge that the Policy seeks to satisfy the need to deliver a wide choice of high quality homes, and that such an approach has regard to the Framework (para 50). I recommend the following modifications:

- **Policy HD3 – delete and replace with “*Proposals for more than six dwellings should demonstrate how the applicant has sought to meet local needs. Proposals should provide for a mix of housing sizes and the delivery of more smaller and fewer larger dwellings is encouraged. At least 25% of dwellings should meet Lifetime Homes Standards or its equivalent.*”**

Subject to the above, Policy HD3 meets the basic conditions.

Policy HD4: Local Connection

Policy HD4 refers to a Community Land Trust, but there is no evidence that one exists. Whilst the Policy aims to introduce a requirement for affordable homes to be offered to people connected to the Parish, there is no indication of how this will be managed or controlled. The criteria within the Policy are not clearly defined, for example how will the definition of “give or receive support” be interpreted and who will be responsible for judging this ?

Policy HD4 does not have regard to the Framework's requirement for policies to provide decision makers with a clear indication of how they should react to a development proposal. It does not meet the basic conditions.

- **Delete Policy HD4 and Para 6.14**

Policy HD5: The Form of New Development

Policy HD5 comprises a long check-list of criteria. This Policy simply repeats and refers to other Policies elsewhere in the Neighbourhood Plan. As such, it is unnecessary.

- **Delete Policy HD5**

Policy HD6: Materials

In seeking to protect local character, Policy HD6 has regard to the Framework and is in general conformity with the Arun Local Plan, both of which documents recognise and protect local character. However, the wording of the Policy introduces requirements more onerous than those set out in the Framework and the Arun Local Plan and as such, may prevent sustainable development from coming forward. I propose the following modifications:

- **Policy HD6, change line 4 to read “Where appropriate, new developments *should seek to reflect local...*”**
- **Policy HD6, change last bullet point to read “Street furniture *should also...*”**

Policy HD7: Built Form

The second sentence of Policy HD7 is unclear and confusing. It effectively states that a proposal that clearly affects an impact will be refused. I recommend the following modification:

- **Policy HD7, delete second sentence**

A large remaining part of the Policy would fail to have regard to the requirements of paragraph 154 of the Framework, identified above. The first bullet point of Policy HD7 refers to other Policies in the Neighbourhood Plan and is unnecessary. The second bullet point is worded in a way that is more onerous than national policy.

- **Policy HD7, delete first bullet point**
- **Policy HD7, change second bullet point to read “Where appropriate, new development *should follow established...*”**

The third bullet point is highly restrictive. It would potentially prevent the sustainable development of any dwelling above 2.5 storeys from coming forward,

even where it could be demonstrated that any such development would not harm, but may even enhance its surroundings. This approach would fail to have regard to the national policy assumption in favour of sustainable development. I recommend the following modification:

- **Policy HD7, third bullet point, change lines 2 to 4 to read “...area) *unless it can be demonstrated that the proposal would be in keeping with its surroundings.*”**

The fifth bullet point, in attempting to repeat information in another Policy of the Neighbourhood Plan introduces a highly onerous requirement that would conflict with that other Policy.

- **Policy HD7, delete fifth bullet point**

The final bullet point is confusing in that it does not permit a form of development, but then allows that form of development subject to criteria. Furthermore, it refers to height affecting density, without demonstrating why height and not volume, for example, would affect density. This approach lacks clarity.

- **Policy HD7, delete final bullet point**

Policy HD8: Housing Layout and Design

In its opening paragraph, Policy HD8 seeks to cover heritage matters that are considered in other Policies of the Neighbourhood Plan. The paragraph also refers to anything that has an “affect” without distinguishing between a positive, neutral or negative effect. Consequently, the opening paragraph is unnecessary and confusing.

- **Policy HD8, delete opening paragraph**

The second bullet point requires all development to demonstrate the highest quality of design. No indication is given as to how this onerous requirement can be met, or how it will be measured. There is not, for example, a national table ranking the highest quality of design. The bullet point then refers to the Policy “particularly” applying to the Conservation Area. This suggests that the Policy applies differently to different areas, without explanation of how. It is therefore confusing.

- **Policy HD8, change first bullet point to “*Proposals for new development should demonstrate high quality design...and seek to incorporate local design...*”**
- **Policy HD8, first bullet point delete second sentence**

It is helpful that Policy HD8 provides sufficient flexibility with regards the possible future phasing out or replacement of the Code for Sustainable Homes with its reference to “or equivalent.”

- **Policy HD8, second bullet point, remove square bracket after “equivalent.”**

The third bullet point requires development to retain all trees and mature shrubs. This requirement is significantly more onerous than any national policy advice or any local strategic planning policy. As such, it introduces potentially inappropriate requirements, for example, the replacement of damaged trees or the removal of unsightly shrubbery would conflict with Policy HD8.

- **Policy HD8, third bullet point, delete first sentence**

Whilst it may be physically possible, it may not be appropriate in all circumstances to introduce traditional architectural features. I recommend the following modification:

- **Policy HD8, change second line of final bullet point to read “architraves *will be encouraged where appropriate to a development.*”**

Policy HD9: Housing Density

The supporting information suggests that an emerging planning document “allows” for something in the Neighbourhood Plan. This is not the case.

- **Remove reference to emerging planning document in Para 6.23 and delete Para 6.24.**

The second bullet point of Policy HD9 states that there is a presumption against development outside the Built-Up Area Boundary. This fails to have regard to the Framework, which has a presumption in favour of sustainable development. It then goes on to suggest density criteria. This also fails to have regard to the presumption in favour of sustainable development - for example, the redevelopment of a complex of farm buildings may necessarily result in development at a higher density than the nearest residential development, but may comprise a sustainable development that doesn’t alter the existing density of the complex. As worded, Policy HD9 would preclude such development.

- **Policy HD9, delete second bullet point.**

The final sentence of Policy HD9 simply refers to other Policies and is unnecessary.

- **Policy HD9, delete final sentence.**

Subject to the above, Policy HD9 provides locally relevant guidance on housing density and has regard to the Framework, which protects local character. It is in general conformity with the Arun Local Plan, which also protects local character.

Policy HD10: Parking for New Developments

There is much reference in Policy HD10 to West Sussex County Council parking standards and related information. However, the Policy then goes on to set its own approach to car parking. As set out, the proposed Policy would result in requirements that, for example, require a 1 bedroom house to provide two car parking spaces and a garage space. This seems an extraordinary requirement and no detailed evidence is provided to demonstrate why such a deviation from established car parking standards is necessary.

The Policy requirement also conflicts with itself and thus fails to have regard to the requirements of paragraph 154 of the Framework identified above. It requires 4 bedroom houses to provide three car parking spaces and two garage parking spaces; and it requires 4 bedroom houses to provide four car parking spaces and two garage spaces.

The Policy goes on to require parking to be located in between and not in front of dwellings. This is an onerous requirement that may not always be appropriate. It fails to have regard to the national policy assumption in favour of sustainable development.

Policy HD10 does not meet the basic conditions.

- **Delete Policy HD10 and Paras 6.31 and 6.32**

Policy HD11: Phasing of Residential Development

Policy HD11 recognises the importance of delivering infrastructure and services alongside development. The Framework states that the provision of infrastructure and services forms part of the economic and social dimensions of sustainable development. The first two paragraphs thus contribute to the achievement of sustainable development.

The second part of the Policy goes on to set out detailed requirements that fall within the control of bodies other than the Parish Council.

- **Delete the second part of Policy HD11, from “If it is not...”**

Policy CLW1: Provision of a Youth Centre

Paragraph 7.1 appears to base the whole of this section on an emerging planning document. The section would be made clearer by the following:

- **Delete Para 7.1**

The Framework recognises the fundamental role that supporting strong, vibrant and healthy communities plays in achieving sustainable development (para 7). It goes on to explicitly support the development of community services in villages (para 28). Policy CLW1 supports the provision of a Youth Centre, subject to clearly set out criteria. It has regard to the Framework and contributes to the achievement of sustainable development.

Policy CLW2: Provision of Open Spaces for Sport and Leisure and Play Areas

Whilst paragraphs 7.10 to 7.14 set out helpful and interesting background information, Policy CLW2 is a confused Policy that seeks to achieve a wide variety of things outside the control of the Neighbourhood Plan.

The first bullet point of the Policy refers to Arun District Council's District-wide Infrastructure Delivery Plan. It is not the role of the Neighbourhood Plan to take on District-wide functions. The second bullet point provides no detail on the size, type or expected contribution towards Play Areas and thus does not have regard to paragraph 154 of the Framework.

The third and fourth bullet points refer to Local Green Spaces and Assets of Community Value, but, as considered re: Policy CLW3 below, the Neighbourhood Plan sets out a confused approach to Local Green Space – a specific national planning policy – and does not identify any designated Assets of Community Value.

Policy CLW2 does not meet the basic conditions.

- **Delete Policy CLW2**

Policy CLW3: Provision of Allotments

The introductory paragraph of CLW3 comprises background information. It does not form part of the Policy itself.

- **Policy CLW3, delete first paragraph.**

The final bullet point of CLW3 states that land at Honey Lane will be allocated as Local Green Space. No detailed plan showing the boundary of this site is provided and no other detail is set out. Policy CLW3 refers to Appendix E. Appendix E does not provide information specific to Honey Lane, but states that the Allotments (including Goring Close) comprise a well-maintained and well-used area.

Whilst Appendix E includes some generic information relating to green space in general, it fails to provide any reasoned justification for the allocation of land at Honey Lane as Local Green Space.

The Framework enables local communities to identify, for special protection, green areas of particular importance to them. It goes on to state that *“By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances.”* (para 76).

Local Green Space is a restrictive and significant policy designation. The Framework requires the managing of development within Local Green Space to be consistent with policy for Green Belts. Effectively, Local Green Spaces, once designated, provide protection that is comparable to that for Green Belt land. The Framework is explicit in stating that *“The Local Green Space designation will not be appropriate for most green areas or open space.”* (para 77).

Plan-makers seem to be confused about the differences between Local Green Space and other open space. I am not satisfied that the Honey Lane allocation is the result of an appropriate assessment, having regard to national policy. It is essential that, when allocating Local Green Space, plan-makers can clearly demonstrate that the requirements for its allocation are met in full. These requirements are that the green space is in reasonably close proximity to the community it serves; it is demonstrably special to a local community and holds a particular local significance; and it is local in character and is not an extensive tract of land.

The provision of generic information relating to various areas of open space across the Neighbourhood Area does not, in my view, provide a robust or appropriate approach to such an important and restrictive policy designation as Local Green Space. The absence of a plan showing the proposed Honey Lane allocation and the absence of detailed information clearly setting out how Honey Lane meets the specific requirements of Local Green Space policy means that this part of Policy CLW3 does not meet the basic conditions.

- **Policy CLW3, delete second bullet point**

The first bullet point of Policy CLW3 safeguards a community facility and in so doing, has regard to the Framework.

Policy CLW4: Education Needs and Provision

Policy CLW4 relates to matters under the control of West Sussex County Education Authority and not the Neighbourhood Plan. However, together, the supporting paragraphs and the Policy text are informative. I propose the following modification:

- **Remove Policy CLW3 Policy title and grey box and instead of a Policy, include the content of the removed Policy as supporting information – ie, add new paragraphs below para 7.25**
- **For clarity, Policy CLW3 is deleted**
- **Delete bracketed reference between sub-title and para 7.20**

Policy CLW5: Health Facilities

- **Delete para 7.27 which is based on an emerging planning policy**

Policy CLW5 has regard to the Framework, which dedicates a chapter to the promotion of healthy communities. However, the opening sentence is confusing as it conflicts with the majority of the Policy, which allows for the change of use of health facilities, subject to certain criteria.

- **Policy CLW5, delete first sentence**

The third bullet point of the Policy is significantly more onerous than national policy. It fails to reflect that it may be that the redevelopment of a health facility can contribute significant resources for alternative provision. There is no national policy requirement for all such redevelopment to contribute to vitality, viability, health and wellbeing and furthermore, no detail is provided as to how these things would be measured. The third bullet point does not provide clarity, having regard to para 154 of the Framework.

- **Policy CLW5, delete third bullet point**

Employment and Retail

Policies 8.5, 8.6 and 8.12 suggest that the ensuing Neighbourhood Plan Policies are “in line” and “in agreement” with an emerging planning document.

- **Delete paras 8.5, 8.6 and 8.12**

Policy ER1: Retail Provision

Generally, this Policy has regard to the Framework, which recognises the importance of local centres and supports proposals that safeguard their vitality and viability. Policy ER1 seeks to protect shops in the local centre.

However, the first bullet point requires a two year marketing period. This is an exceptionally long time given that any such premises may be vacant. There is no substantive evidence to demonstrate why such an onerous two year period has regard to national policy or is in general conformity with the strategic policies of the development plan. The bullet point goes on to use the phrase “reasonable price” without defining what is reasonable and who will determine this, or whether a “price” can relate to the payment of rent, for example. In this regard, I note that full details related to the marketing process are required, so there does not appear to be a need for this extra “reasonable price” reference.

The second bullet point is also onerous, requiring any proposal to demonstrate that it will contribute to the health and well-being of Angmering. No indication of how this can be demonstrated is provided. This comment also relates to the third bullet point, which introduces a requirement relating to a use being “relied upon by residents.” There is no indication as to how such a requirement could be measured and as such, it fails to have regard to para 154 of the Framework.

- **Policy ER1, first bullet point, refer to “*not less than one year for retail use*” and delete “at a reasonable price.”**
- **Policy ER1, second bullet point, change wording to “... *vitality and viability of Angmering.*”**
- **Policy ER1, change third bullet point to, “... *vitality and viability of Angmering.*”**

Policy ER2

Paragraphs 8.21, 8.22 and 8.25 relate specifically to emerging planning policy.

- **Delete paras 8.21, 8.22 and 8.25**

Policy ER2 has some of the same problems as Policy ER1. Rather than repeat the information above, the following recommendations are made and in addition, I note that, unlike for local centres, the Framework does not use the phrase vitality and viability when considering employment land:

- **Policy ER2, first bullet point re-word as “...of not less than one year for employment...”**
- **Policy ER2, change second bullet point to “the sustainability of Angmering.”**

Policy TM1: Traffic Management – New Developments

Policy TM1 appears to comprise a statement more suited to supporting information than actual Policy wording. Furthermore, where the Policy does suggest things that “should” happen, or that are “particularly important,” there is little clarity on exactly what is required from developers and what would happen if items from the wish-list set out in the Policy are not met.

It is unclear, for example, how “short, direct links” could be provided from development sites and whose responsibility these would be. No provision is made to set out how the Policy would apply to children who may need to travel to school via vehicle, for any number of reasons. It is unclear what the definition of a “site” is with regards to the requirement to introduce a self-enforcing speed limit or demonstrate non-viability. It is unclear what “satisfactory mitigation” comprises.

Policy TM1 fails to have regard to the Framework which requires policies to provide a clear indication of how a decision maker should react to a development proposal.

Policy TM1 does not meet the basic conditions.

- **Delete Policy TM1**

Policy TM2: Local Highways

The first part of Policy TM2 requires adequate provision to mitigate impacts of traffic to be provided. This, together with the second bullet point, has regard to the Framework, which supports the production of Transport Assessments or Statements (para 32). The Policy goes on to make a positive statement in support of development that seeks to provide a new access road to reduce through traffic in the Conservation Area.

- **Policy TM2, use capitals for “Conservation Area.”**
- **Policy TM2, bullet point two, change to read “*Proposals for development that generate traffic are required to demonstrate that the level of traffic...*”**

The third bullet point appears to pre-judge the results of any Transport Assessment, Statement or “development management plan” (an undefined term in the Neighbourhood Plan). It may be that it is appropriate and sustainable to introduce phased mitigation alongside phased development. Bullet point three would not allow for this and would thus fail to reflect the national policy assumption in favour of sustainable development.

- **Policy TM2, delete bullet point three**

The final bullet point appears as an isolated comment and it is not clear as to whom it would apply.

- **Policy TM2, delete bullet point four**

Policy TM3: Cycling, Walking and Equestrian

Policy TM3 seeks to encourage walking and cycling as alternative modes of transport; and seeks to encourage and protect public rights of way, particularly for leisure use. This overall approach has regard to the Framework, which recognises the importance transport policies have to play in facilitating sustainable development and contributing to wider sustainability and health objectives (para 29).

The wording of the first bullet point states that public rights of way will be protected, but does not set out who will do this or how. This is unclear and I recommend the following modification:

- **Policy TM3, change first bullet point to *“Proposals which harm the following characteristics of public rights of way will be resisted:”***

It is not clear what the third bullet point requires and therefore how it will be implemented. “Safe and usable facilities for cyclists, pedestrians” is undefined. What are safe and usable facilities? When would the requirement to provide a safe and usable facility for horse riders be “appropriate”? What if it is not possible to provide links to existing cycle, footpath and equestrian networks, for reasons of ownership or for other reasons?

This final bullet point fails to have regard to the Framework’s requirement for clarity.

- **Policy TM3, delete third bullet point**

The last sentence of the Policy is unclear. The wording used suggests that there is an intent to provide new connections everywhere in the Neighbourhood Area where none currently exists, which is obviously not the case.

Policy TM3, change to *“...as well as supporting the provision of new connections, where these have been identified and can be delivered.”*

Policy TM4: Safe Routes to School

This Policy seeks to require all development for more than 20 dwellings to enable children to travel to pre-schools, primary and secondary schools (as long as they are “village schools”) safely. It refers to Appendix F, a supporting document which states

“there are no safe walking routes to school within the Parish, other than for those attending The Angmering School living south of the Square.”

Given the above, it appears unreasonable to require any development of 20 or more dwellings to resolve what is defined, in Appendix F, as a major infrastructure requirement. There is no evidence provided to demonstrate that a development of 20 or more dwellings could viably deliver safe routes to village schools. Consequently, there is a lack of evidence to demonstrate that the requirements of Policy TM4 are achievable. This approach fails to have regard to the Framework, which requires plans to be realistic (para 154). The policy does not meet the basic conditions.

- **Delete Policy TM4**

Policy TM5: Overflow Parking from Angmering Station

Overall, Policy TM5 supports the expansion of the car park at Angmering station and requires associated provision for cycle parking. This has regard to the Framework, which supports a switch to sustainable modes of transport. Policy TM5 contributes to the achievement of sustainable development.

The first paragraph of Policy TM5 refers to a proposal in an emerging planning document. There is no need to include this in the Policy.

- **Policy TM5, delete the first paragraph, but retain “This Policy will...**

Policy TM6: Parking in the Village Centre

The first paragraph of Policy TM6 effectively repeats earlier supporting information:

- **Policy TM6, delete first paragraph and set out the information in the bullet point as a paragraph in the Policy (ie, not as a bullet point)**

Policy TM6 has regard to the Framework, which, as set out above, supports the vitality and viability of Local Centres.

Environment and Heritage

Policy EH1: Listed Buildings and Structures and Buildings of a Special Character

Heritage assets are an irreplaceable resource. National planning policy protects heritage assets. Policy EH1 introduces its own methodology for the assessment of proposals that impact on heritage assets.

Policy EH1 sets out a “presumption against development that would adversely affect” heritage assets. However, national policy is clear in this regard. Even where there would be substantial harm to, or loss of an asset of the highest significance, it may be that, for wholly exceptional reasons, development could still go ahead. Policy EH1 fails to have regard to national policy in this respect. It does not meet the basic conditions.

Rather than dissect Policy EH1 in detail, as there are other significant conflicts with national policy, I am satisfied that, in proposing the modification below, national policy, and Arun Local Plan Policy GEN22, afford appropriate protection to heritage assets.

- **Delete Policy EH1**
- **Supporting paragraphs 10.1 to 10.4 to remain**

Policy EH2: Development in the Conservation Area

The opening sentence of Policy EH2 is not clearly worded:

- **Policy EH2, change to “*The Design and Access Statement and accompanying drawings for all development within or affecting the setting of the Conservation Area must provide sufficient detail for proposals to be properly understood and include:*”**

The second bullet point, referring to three-dimensional drawings, may be an unnecessary requirement for minor proposals, for example, replacement windows. Only information that is relevant, necessary and material to the application in question is necessary, according to the Framework (para 193). I recommend the following modification:

- **Policy EH2, bullet point two “*For larger developments, including all proposals for new or replacement dwellings three dimensional drawings from at least two viewpoints will be required.*”**

Subject to the above, the Policy is in general conformity with the Local Plan, which protects local character and has regard to the achievement of sustainable development, as established in the Framework, which recognises the protection of the built environment as fundamental to sustainability (para 7).

Policy EH3: Building Style Must be Appropriate to the Historic Context

The content of Policy EH3 is better suited to supporting information – it provides little in the form of requirements or clarity and to some degree simply summarises parts of existing policy.

The requirement for any proposals that may affect the setting of a listed building to be discussed with the Parish Council and the District Council early in the design process does not have regard to the Framework, which does not set out such a requirement. Policy EH3 does not meet the basic conditions.

- **Delete Policy EH3 and place all text, except final bullet point, which should be deleted, under paragraph 10.7 as supporting information.**

Policy EH4: Landscape Policy

The opening sentence of Policy EH4 fails to have regard to paragraph 154 of the Framework with regards clarity. There is no indication of what Parish landscape resources are or who will conserve and enhance them. There is no indication as to how the third bullet point will be implemented and what it will be prioritised over. The rest of Policy EH4 is not a land use planning policy. It simply refers to other documents. The Policy does not meet the basic conditions.

- **Delete Policy EH4. Place the first two bullet points below paragraph 10.9 as supporting information. Delete the rest of the Policy.**

Policy EH5

Policy EH5 seeks to protect the setting of the South Downs National Park. The intention of the Policy has regard to the Framework, which affords great weight to conserving landscape and scenic beauty in National Parks.

However, Policy EH5 requires all development on sites adjoining the National Park to be “seamless and consistent with local landscape character” and “not adversely affect” views. There is no evidence to demonstrate that this approach has regard to national policy or is in general conformity with local strategic policies. However, there is no evidence to demonstrate that a development could not be sustainable and that its benefits could not outweigh any possible impact on landscape character or views into or out of the National Park.

Taking the above into account I consider that Policy EH5 fails to have regard to the national policy assumption in favour of sustainable development.

The Policy then sets out requirements based on emerging planning policy and existing planning documents. Existing planning documents already control development and do not need to be summarised or referred to in additional planning policies. Emerging planning policy is exactly that and should not form the basis of neighbourhood planning policies.

Policy EH5 does not meet the basic conditions.

- **Delete Policy EH5**

Policy EH6: Protection of Local Green Spaces and Assets of Community Value

I make reference to Local Green Spaces and Assets of Community Value earlier in this Report. None exist in the Neighbourhood Area.

- **Delete Policy EH6**

Policy EH7: Protection of Trees and Hedgerows

Policy EH7 states that all trees and hedgerows in the Neighbourhood Area will be protected. It goes on to state that “other significant landscape features” will be protected, and provides a very wide-ranging list of features.

Whilst I acknowledge that trees and hedgerows can provide important wildlife corridors and that open space and green features can be attractive, the Policy effectively comprises a blanket protection policy for all trees, hedgerows and other features in the Neighbourhood Area. There is no evidence to demonstrate that all of these features are worthy of protection or that their removal, replacement or alteration as part of a sustainable development cannot be achieved.

Policy EH7 is over-ambitious and to some considerable degree, is naïve in its sweeping approach. Amongst other aspects of national policy, it fails to have regard to the Framework’s assumption in favour of sustainable development. It does not meet the basic conditions.

- **Delete Policy EH7**

Policy EH8: Flood Prevention

This Policy has regard to Chapter 10 of the Framework, which requires plans to make development in areas at risk of flooding safe without increasing flood risk elsewhere; and which gives priority to the use of sustainable urban drainage systems.

However, the wording of the second part of Policy EH8 is confusing and introduces a convoluted confirmation process involving various bodies. This fails to have regard to the Framework, which is clear in establishing that development that is sustainable should go ahead – without delay. The Policy also lacks clarity for decision-makers.

As worded, the Policy relates to “any” development. Some proposals, for example, for replacement double-glazing in a Conservation Area, may have no flooding implications whatsoever.

- **Policy EH8, retain first paragraph and first two bullet points. Delete the rest of the Policy and replace with “*Development at risk from flooding should incorporate a sustainable urban drainage system unless it is demonstrated that an alternative drainage system is appropriate.*”**

Policy EH9: Archaeology

The Framework and Arun Local Plan Policies AREA16 and AREA17 set out policy requirements relating to archaeology. Policy EH9 simply interprets and repeats elements of existing policy and seeks to impose requirements that would not be controlled by the Parish Council but by the local planning authority. It is not the role of neighbourhood plans to duplicate existing planning policy or to introduce policies that point out the roles of other bodies.

- **Delete Policy EH9**

With regards the above, I recognise that paragraphs 10.21 to 10.26 relate to the importance of archaeology to the Neighbourhood Area. Whilst there would be no Policy relating to this information, the final paragraph might comprise a future Community Action. I therefore recommend:

- **Para 10.26, add, “*within Angmering. The Parish Council will explore the potential to achieve this through its Community Action Plan.*”**

Housing Allocation – Site Specific Policies

This section of the Neighbourhood Plan is unwieldy and the Policies appear hidden away amidst confusing and at times, somewhat irrelevant text. A number of the supporting paragraphs read as Policies, which they are not, or repeat/or introduce conflict with other elements of the Neighbourhood Plan, or are simply unnecessary.

- **Para 11.3 delete second sentence (reference to Green Gaps etc)**
- **Delete Para 11.4**
- **Delete references at end of Paras 11.4 and 11.9**
- **Delete Paras 11.5 and 11.6**
- **Para 11.7, simply list the three allocations (name only), there is no need to provide a potted history of them**
- **Delete Para 11.8**
- **Delete Para 11.9**
- **Delete Para 11.10**
- **NB, delete references 11, 12 and 13**
- **Delete the first sentence of 11.11**

Policy HA1: Bramley Green South (Mayflower Way)

As worded, the content of this Policy simply sets out a very limited steer for developers. I note that it refers to matters relating to another body (the Environment Agency). To comprise a land use planning policy, I recommend the following modification:

- **Change Policy HA1 to read *“Development at the site must provide at least 66 dwellings; associated open space; allotments; and screening to protect the outlook and minimise noise and disturbance for occupiers. Where possible, the proposal should seek to provide a safe route to the centre of the village and local school.”***

Subject to the above, the Policy contributes to the achievement of sustainable development.

Policy HA2: Field in Mayflower Way

- **Delete density reference under Para 11.24 – this is not a Policy requirement**
- **Delete Para 11.28, these do not comprise Policy requirements (see below)**

It is illogical to allocate this site as a development site and yet not alter the settlement boundary to include it.

- **Alter the settlement boundary to include the site**

Policy HA2 states that “the development will be run by an approved Affordable Housing Provider.” It is unclear whether this means the site will be developed or managed by such a provider. Also, it is not clear why the site could only be developed or managed by such a provider. This lack of clarity fails to have regard to paragraph 154 of the Framework.

- **Policy HA2, delete first sentence**

Further to the above, whilst I note that the Housing Needs Survey identifies the site as a suitable one for affordable housing, the Policy does not state what proportion of homes should be affordable. No substantive evidence is provided to demonstrate that the whole development should comprise affordable housing. Also, the Policy is not worded as a Policy, but as general information. I recommend:

- **Policy HA2, change wording to read: “*The site will provide at least 16 dwellings, including 2-3 bed affordable homes and associated green space.*”**

Subject to the above, the Policy contributes to the achievement of sustainable development.

Policy HA3: Chandlers Site

- **Delete density reference under Para 11.33, this is not a Policy requirement**
- **Para 11.33, change wording to “*...parking. It may be that this could be done...*”**
- **Policy HA3, delete the final two sentences, which include unnecessary references**

Subject to the above, Policy HA3 contributes to the achievement of sustainable development.

8. Summary

The Angmering Neighbourhood Plan is the result of a significant community effort and demonstrates a passion for neighbourhood planning.

Further to consideration of its Policies against the basic conditions, I have recommended a number of modifications to the Neighbourhood Plan.

Subject to these modifications, the Angmering Neighbourhood Plan

- has regard to national policies and advice contained in guidance issued by the Secretary of State;
- contributes to the achievement of sustainable development;
- is in general conformity with the strategic policies of the development plan for the area;
- does not breach, and is compatible with European Union obligations and the European Convention of Human Rights.

Taking the above into account, I find that the Angmering Neighbourhood Plan meets the basic conditions. I have already noted above that the Plan meets paragraph 8(1) requirements.

9. Referendum

I recommend to Arun District Council that, subject to the modifications proposed, **the Angmering Neighbourhood Plan should proceed to a Referendum.**

Referendum Area

Neighbourhood Plan Area - I am required to consider whether the Referendum Area should be extended beyond the Angmering Neighbourhood Area. I consider the Neighbourhood Area to be appropriate and there is no substantive evidence to demonstrate that this is not the case.

I recommend that the Plan should proceed to a Referendum based on the Angmering Neighbourhood Area as approved by Arun District Council on 10 December 2012.

Nigel McGurk, November 2014
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