

Walberton Neighbourhood Plan Review 2020 Regulation 14 Consultation

Representations on behalf of
West Sussex County Council Asset Management
and Estates Department

August 2020



1 Introduction

- 1.1 Henry Adams LLP act on behalf of West Sussex County Council in respect of Choller Estate, land south of Eastergate Lane. A site location plan is produced at Appendix 1, highlighting the location of our clients land.
- 1.2 These representations respond to the Regulation 14 Consultation version of the Neighbourhood Plan Review (2020). The Neighbourhood Plan is being reviewed to ensure that its Policies are aligned with the Arun District Local Plan that was adopted in 2018.
- 1.3 There are a number of modifications to previously made Policies in order to ensure they align with the Arun District Local Plan. The main modifications relate to five additional housing Allocations which would equate to the provision of an additional 68 dwellings. It is felt that there is limited objective evidence to demonstrate that the selected sites and overall housing numbers are appropriate. Within the following sections, we intend to set out our thoughts on this matter.

2 Approach to new residential development – object

- 2.1 Paragraphs 2.4 and 5.4 of the draft plan note that Walberton Parish have been advised that they may be required to allocate site (s) for up to 60 dwellings. This is likely to have been taken from a draft Strategy Paper in 2018, which was presented to the District Council's Local Plan Sub-Committee to inform a Non-Strategic Sites Allocation Document. The Strategy Paper has not resulted in the progression of a Non-Strategic Sites Allocation document by the District Council, and due to the lack of any formal publication or consultation, it is suggested that this should not be relied upon. At the time that the Strategy Paper was prepared, the Arun Local Plan (July 2018) was considered up to date, which is no longer the case.
- 2.2 We are unable to locate any supporting note within the evidence base to the Neighbourhood Plan to inform this, nor the date at which this information was issued and agreed following public consultation.

Planning Practice Guidance

- 2.3 The National Planning Practice Guidance provides very clear advice on matters of housing numbers, where it states:

The scope of neighbourhood plans is up to the neighbourhood planning body. Where strategic policies set out a housing requirement figure for a designated neighbourhood area, the neighbourhood planning body does not have to make specific provision for housing, or seek to allocate sites to accommodate the requirement (which may have already been done through the strategic policies or through non-strategic policies produced by the local planning authority). The strategic policies will, however, have established the scale of housing expected to take place in the neighbourhood area.

*Housing requirement figures for neighbourhood plan areas are not binding as neighbourhood planning groups are not required to plan for housing. However, there is an expectation that housing requirement figures will be set in strategic policies, or an indicative figure provided on request. **Where the figure is set in strategic policies, this figure will not need retesting at examination of the neighbourhood plan. Where it is set as an indicative figure, it will need to be tested at examination** (our emphasis).*

(NPPG: Paragraph: 104 Reference ID: 41-104-20190509)

Where strategic policies do not already set out a requirement figure, the National Planning Policy Framework expects an indicative figure to be provided to neighbourhood planning bodies on request. However, if a local planning authority is unable to do this, then the neighbourhood planning body may exceptionally need to determine a housing requirement figure themselves, taking account of relevant policies, the existing and emerging spatial strategy, and characteristics of the neighbourhood area. The neighbourhood planning toolkit on housing needs assessment may be used for this purpose. Neighbourhood planning bodies will need to work proactively with the local planning authority through this process, and the figure will need to be tested at examination of the neighbourhood plan, as neighbourhood plans must be in general conformity with strategic policies of the development plan to meet the 'basic conditions'.

(NPPG Paragraph: 105 Reference ID: 41-105-20190509)

- 2.4 It is clear that the adopted Local Plan does not set a clear defined figure for the Parish, nor an indicative figure. It is therefore a matter that must be tested at Examination and should be informed by appropriate evidence.

Basic Conditions Statement & Local Plan

- 2.5 The Basic Conditions Statement, published March 2020, sets out within a table (paragraph 4.1) that the proposed housing allocations and housing numbers are based on a number of Policies contained within the adopted Arun Local Plan (July 2018). It then quotes specific Local Plan Policies against each of the proposed 'new' housing allocations in the draft Neighbourhood Plan.
- 2.6 In reviewing the Local Plan, it is clear that this does not set a specific figure or housing requirement for Walberton. Instead, it sets a minimum requirement for at least 1,250 homes to be allocated either through a Non-Strategic Sites Development Plan Document (allocations of less than 300 homes) or Neighbourhood Plan review. At this stage, Arun have not progressed any further work on a Development Plan Document. Accordingly, the reference and very limited justification of conformity with the Basic Conditions Statement may be considered incomplete. We feel that some further work is likely to be required to demonstrate

how the Neighbourhood Plan conforms with the Local Plan Strategy, or in the absence of an up to date strategy, its own evidence.

- 2.7 Given the current District Housing Land Supply Calculations, it is clear that Arun District Council are currently unable to demonstrate a 3 year housing land supply, let alone the 5 years required by National Planning Policy. Whilst Walberton village may have taken additional dwellings in recent years, these are committed and will already be counting towards the housing land supply. Additional site Allocations will therefore be needed to make up this shortfall and boost the supply of housing, as required by National Policy.
- 2.8 Walberton comprises a sustainable settlement, with direct access to keys services and facilities, with the following facilities available in the local area within walking distance of the site:
- Walberton and Binstead C of E Primary School
 - Walberton Pre-School
 - Walberton Village Hall and sports pitches
 - Post office, newsagent, greengrocer, laundrette, hairdressers and dental surgery
 - Flintcroft GP Surgery
 - St Mary's Church
 - Walberton Baptist Church and Church Hall
 - The Holly Tree and the Black Horse Public Houses
 - Walberton Recreation Ground
 - Hooe Farm Industrial Park
 - Hilton Avisford Park Hotel and Golf Club
- 2.9 The nearest railway station is at Barnham which is 1.8 miles south west of Walberton with regular services to settlements throughout West Sussex and beyond to London, Portsmouth and Southampton, Bristol and Cardiff. This is accessible via dedicated off-road cycle route, which links Barnham and Walberton.
- 2.10 Focusing development around Walberton would be best placed to support the services and facilities within the village, as opposed the proposed allocation under draft Policy HP18 2020 - Fontwell Field (National Trust Field), which seeks to allocate the only major housing Allocation away from the main services and facilities, which are in Walberton, and without direct connectivity to sustainable means of transport.
- 2.11 At this stage, the current Local Plan is considered out of date, so too its housing strategy, as the District Council are not meeting the housing delivery trajectory set out within the Local Plan. It is therefore highly unlikely, based on the current strategic housing Allocations and delivery rates, that the requirement to deliver 20,000 homes across the Local Plan period can be met given the current strategy. Reliance on Policies within the Local Plan, in terms of the housing requirement for the Parish would not be informed by an up-to-date Local Plan and would therefore be unsound.

- 2.12 As set out above, appropriate evidence is required to support the Neighbourhood Plan housing requirements to ensure its soundness, which has not been prepared, or at least made publicly available for review.

Proposed Housing Allocations

- 2.13 When considering the draft site allocations, there are five new sites to be allocated for housing development. Only one of these sites comprises a major development proposal (Policy HP18 2020 Fontwell Field (National Trust Field NEW) that will provide community benefits such as affordable housing, which is much needed within both the immediate area and district as a whole.
- 2.14 Policy HP16 2020 Sussex Business Park NEW, seeks to combine both commercial units and residential dwellings within one site proposal. However, there are no references to the type of commercial use being provided and whether this would be compatible with a residential use. Considering this is currently a commercial site with a number of units being lost to residential, further clarity should be provided to ensure that there would not be any issues with retaining or creating appropriate commercial space to meet demand, when considered alongside residential amenity. The demand for commercial space and employment should be given priority on an existing commercial site.
- 2.15 Considering the above factors, a formal, updated response should be obtained from Arun District Council setting out the number of dwellings that need to be provided within the Parish. This should form part of the evidence base. If not forthcoming from Arun District Council, this should be prepared on behalf of the Parish Council to inform the headline figure, which is not evidenced at present. The Neighbourhood Plan should also be mindful that providing slightly larger development proposals as opposed to the sporadic allocation of minor proposals (less than 10 dwellings) could actually provide a number of benefits to the community whilst also addressing and supporting other aspirations and policies within the Neighbourhood Plan.

3 General approach and Choller Estate

- 3.1 Our clients understand the intentions and benefits of having a Neighbourhood Plan in place. However, it is felt that as currently drafted it is a missed opportunity to really plan the evolution of the village and identify development that can support new infrastructure, which is highlighted as an issue in the village.
- 3.2 We expect that the development of land identified on the Choller Estate may be best placed for development in the future, given other more suitable sites. Nevertheless, it is felt that some consideration should be given to the longer term evolution of the village, to ensure the Plan makes provision for future infrastructure to address existing and future needs of the village.

- 3.3 We would therefore recommend that the Council consider a broader and longer term approach to shaping their village, in light of Arun's low housing delivery rate. The risk of not taking such an approach will likely produce the same result as the current Neighbourhood Plan, where the need for housing numbers take precedent and the Plan for the village quickly becomes out of date.

4 Summary

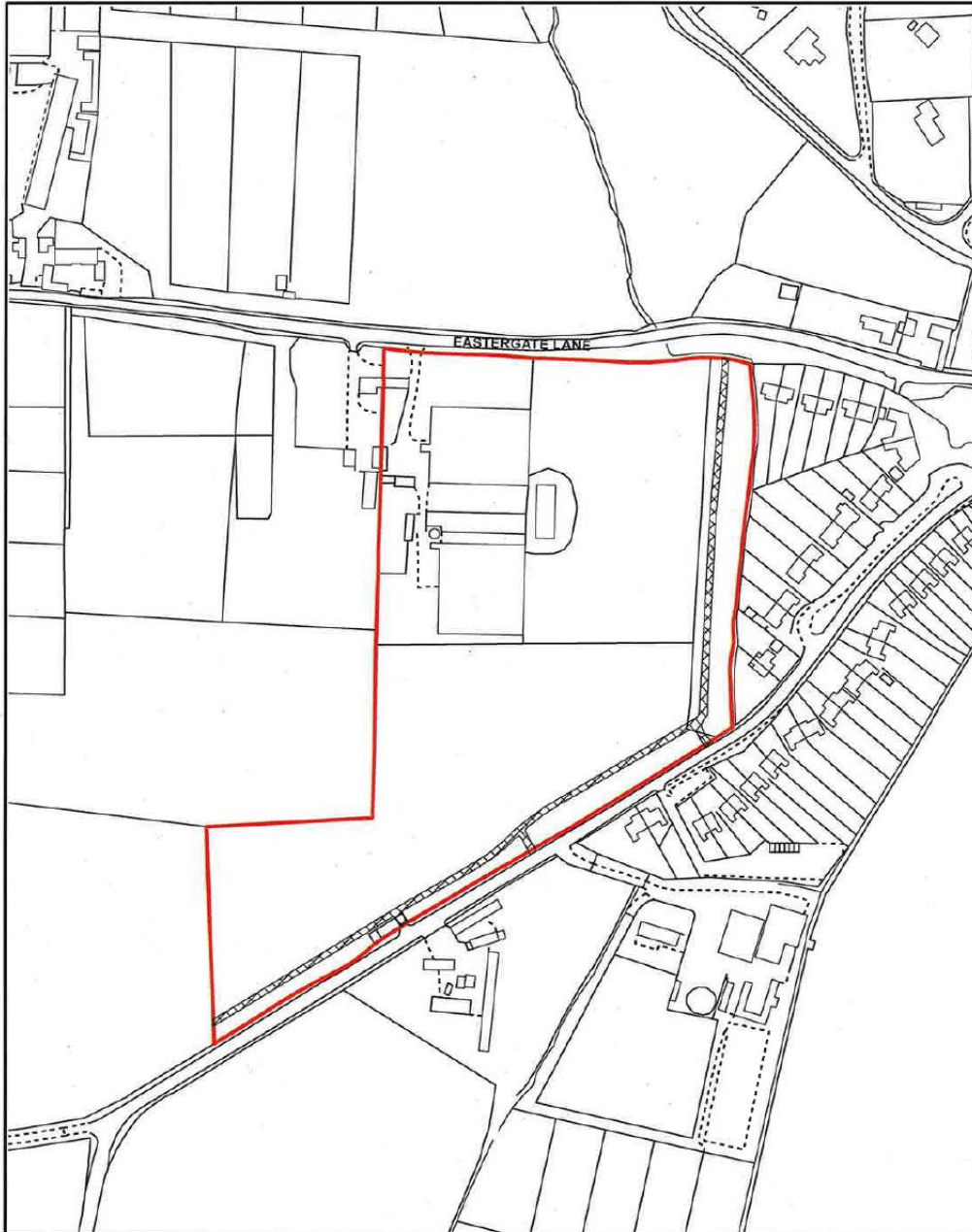
- 4.1 In summary, our client supports the Parish in their approach to devising a Neighbourhood Plan for the area and the opportunity to help address the acute housing needs for the District. However, we do not feel that the plan as a whole reflects the needs and opportunities of the area, nor is it appropriately evidenced in the absence of an up-to-date Local Plan for the District.

- 4.2 We are of the opinion that further evidence should be provided to justify the provision of only 68 new dwellings at a time when the District are falling significantly behind on housing delivery. In addition, the Plan proposes the Allocation of small, minor schemes only, which will provide limited benefits for the wider community.





- 4.3 In order to demonstrate that the Plan is sound, it is recommended that the evidence base be enhanced and used to demonstrate an objective approach to site allocations and policy formation.

- 4.4 We would also suggest that the Neighbourhood Plan group consider a longer term strategy which helps the village evolve, as well as securing appropriate infrastructure. This approach will hopefully avoid the Plan becoming out of date soon after adoption.

Appendix 1: Site Location Plans



LAND AT EASTERGATE LANE

Area	Acres	Ha	Sqm	Produced by Land & Property Information	Map Reference :	SU 963059	 west sussex county council	 N
	12.02	4.86			Economy, Planning & Place	District :		
	0.39	0.16			Parish :	WALBERTON		
					Scale :	1:2500 @ A4		
					Drawing Number :		Plot Date : 31/05/2016	

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