



Neighbourhood Planning Regulations 2012 (Part 5 s15)

**Arundel Neighbourhood Development Plan Proposal -
Consultation Statement**

**To: Arun District Council (Local Planning Authority)
& South Downs National Park Planning Authority**

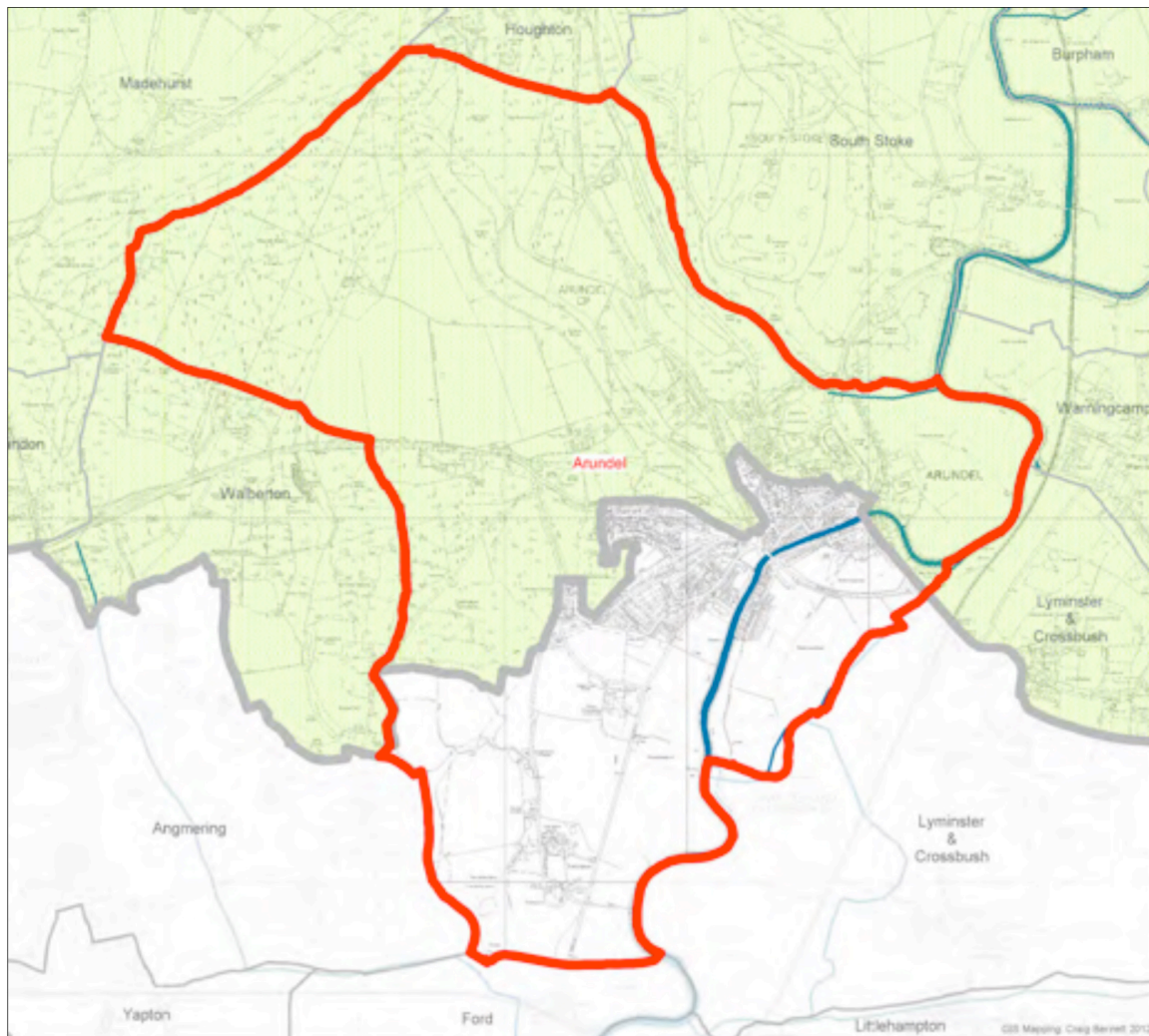
By: Arundel Town Council (Qualifying Body)

November 2013

Arundel NDP Consultation Statement

Neighbourhood Development Plan Title: **Arundel Neighbourhood Development Plan (NDP)**

This application relates to Arundel Town Council and the boundary is indicated on the plan below.



INDEX

	Page
List of appendices	4
Section 1 Introduction	5
Section 2 Background	6
Section 3 Consultation Process	8
Section 4 Main Issues and Concerns	13

Arundel NDP Consultation Statement

Appendices

- 01 Oct 2011 – Mayors Day Launch Event
- 02a-c Dec 2011 Arundel Steering Group SWOT
- 03 Feb 2012 Arundel NDP Publicity
- 04 7 Feb 2012 Arundel Chamber of Commerce SWOT
- 05a March 2012 Arundel Young Persons workshop
- 05b 12 March 2012 Arundel Older Person's group workshop
- 06 April 2012 – Town Council Newsletter
- 07 July 2012 Arundel NP flyer
- 08 21 July 2012 Arundel Agenda 21 Newsletter
- 09 24 July 2012 Arundel Community pilot session
- 10 Aug 2012 to Jan 2013 Communicatuions & Consultation Plan
- 11 October 2012 – Town Council Newsletter
- 12a&b 4 & 6 October workshop flyer and poster
- 12c-f 4 & 6 October workshop plan, briefing sheet & results
- 13a-e 28 January 2013 Workshop plan, attendees & results
- 14 Arundel NDP Initial ideas
- 15 Sept 2012 Community Survey covering letter
- 16 Sept 2012 Community Survey
- 17 Sept 2012 Housing Needs Survey
- 18 Sept 2012 Housing Needs Survey Results
- 19 10 Jan 2013 NDP Presentation to Town Council
- 20 State of the Town Report
- 21 5 March 2013 Presentation to Arundel Networking Group
- 22 26 March 2013 Draft Pre-Submission Plan
- 23 17 April 2013 Comments on ANDP by ADC
- 24a-c 2 May 2013 Town Meeting – Agenda, Presentation, Minutes
- 25 9 May 2013 Town Council Minutes
- 26 List of Reg 14 Consultees
- 27a-d Reg 14 May 2013 Plan, Town Council Newsletter/Flyer & TC Web pages
- 28 General responses to first Reg 14 Consultation
- 29 ADC response to first Reg 14 Consultation
- 30 SDNP response to first Reg 14 Consultation
- 31 APE response to first Reg 14 Consultation
- 32 Town Council October 2013 Newsletter
- 33 12 September Town Council meeting Agenda
- 34 12 September Town Council meeting Minutes
- 35 General responses to second Reg 14 Consultation
- 36 ADC response to second Reg 14 Consultation
- 37 28 November 2013 ADC Strategic Environmental Assessment Opinion Screening letter.

Arundel NDP Consultation Statement

Section 1 Introduction:

This Consultation Statement has been prepared with the aim of fulfilling the legal obligations of the Neighbourhood Planning Regulations 2012, which are set out in the legislative basis below.

An extensive level of consultation (community and statutory) has been undertaken by the steering group, focus groups and parish council than what is required by the legislation and is set out below.

Legal basis:

Section 15(2) of Part 5 of the 2012 Neighbourhood Planning Regulations sets out that, a consultation statement should be a document containing the following:

(a) details of the persons and bodies who were consulted about the proposed neighbourhood development plan; (see section 3)

(b) explanation of how they were consulted; (see section 3)

(c) summary of the main issues and concerns raised by the persons consulted; (see section 4) and

(d) description of how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan (see Appendices 28-31 & 35-36)

Section 2 Background

The Arundel NDP is the culmination of two years work by the Steering Group, initiated by the Town Council and led by the community before the implementation of the Localism Act 2011.

Arundel is an important visitor destination, heritage and cultural centre in the South East UK, market town and one of the gateways to the South Downs National Park (SDNP). In terms of planning it falls within two planning authorities (Arun DC and SDNP) and much of the parish falls within various areas subject to flood risk as defined by the Environment Agency.

The Arundel Neighbourhood Development Plan Steering Group was established by Arundel Town Council in October 2011. In addition to Town Councillors the Steering Group contained members representing Arundel Agenda 21, Arundel Chamber of Commerce, Arundel Community Partnership, SDNP, Norfolk Estate and other individuals.

The Steering Group have been supported by consultants Tom Warder (Action in Rural Sussex) and Neil Homer (rCOH Ltd).

The town has several active groups such as Arundel Community Partnership, Arundel Agenda 21 and Arundel Chamber of Commerce; these groups collaborate together with the Town Council on a number of events (e.g. Arundel Festival, Arundel by Candlelight) and issues (e.g. parking in the town). So the Arundel NDP Steering Group were able to draw on these (engaged) groups/individuals and existing lines of communication in organising the focus groups and workshops outlined in section 3 of this report.

The period from December 2011 to October 2012 was devoted to a significant level of focus groups and workshops and interaction/engagement of key groups and individuals, culminating in a full community survey in conjunction with a housing needs survey delivered to every household in the parish.

These were publicised using a mix of posters, flyers, newsletters, online social media and the Town Council website. The latter being updated regularly during the process.

As a result we achieved a good response rate (17%) to the community survey, the results of which amongst other community consultations fed into the State of the Town Report prepared in December 2012 and published in January 2013.

After a further planning workshop and feedback from Arundel Town Council a first draft for the Arundel NDP was prepared in March 2013. This was submitted to Arun DC for comment.

Arundel NDP Consultation Statement

The Steering Group then presented an amended Pre-Submission Plan to Arundel Town Council for approval in advance of the first statutory consultation in accordance with Regulation 14 between 28 May and 8 July 2012.

Following this and in light of the comments received as well as a new site for housing coming available during the Reg 14 consultation period, the Steering Group met and decided that any changes to the NDP would be so significant that a second Reg 14 Consultation would be required on a Revised Pre-Submission NP.

This was prepared and approved by the Town Council on 12 September 2013 for the second Reg 14 Consultation on the Revised Pre-Submission NDP from 16 September to 27 October.

The representations and comments received were considered and a draft Submission Plan prepared and approved by the Steering Group on 13 November and also approved Town Council on 14 November at a public Full Town Council meeting.

Throughout the process, the Steering Group has maintained regular liaison with officers of the two local planning authorities, and especially Arun District Council, to ensure the policies achieved the right balance between being in general conformity with the adopted Local Plan and anticipating the new Local Plans for Arun and the National Park.

The Steering Group has also sought to actively and consistently engage landowners in and around the town to fully understand their aspirations and plans for development. This process has led to the Group being confident about the delivery of the housing policies of the Neighbourhood Plan.

The Submission Plan includes (inter alia):

- The State of the Town Report (History, demographics, community views and the planning context)
- Visions and Objectives
- Planning Policies covering amongst other things: Sustainability, Housing, Transport, Local Green Spaces, Flood Defences, Assets of Community Value and Buildings of Special Character.

Section 3 Consultation Process

3.1 The consultation process consisted of several stages/events:

- a) December 2011 to October 2012 – Publicity and promotion. Community engagement via Focus Groups and Workshops.
- b) Sept/Oct 2012 – Community Survey and Housing Needs Survey
- c) January 2013 – Publication of the State of the Town Report.
- d) 28 January 2013 – Planning Workshop on State of the Town Report
- e) 5 March 2013 – presentation to Arundel Networking Group
- f) 26 March 2013 Working draft Arundel NDP submitted to ADC
- g) 2 & 9 May 2013 – Presentation to Arundel Town Meeting & Town Council
- h) Reg 14 28 May to 8 July 2013 – Pre-Submission Consultation
- i) Reg 14 16 Sept to 27 Oct 2013 - Revised Pre-Submission Consultation

Arundel NDP Consultation Statement

3.2 Publicity and Community engagement (Focus Groups and Workshops):

Date	Detail	Who consulted	Appendix
2 Oct 2011	Mayors Sunday – Launch event	Voluntary groups & gen public	01
Dec 2011	Physical Assets SWOT analysis	Steering group	02a
Dec 2011	Identify key town characteristics -SWOT	Steering group	02b
Dec 2011	Local population SWOT	Steering group	02c
Feb 2012	Arundel NDP Publicity	Local residents	03
7 Feb 2012	Focus group workshop	Chamber of Commerce	04
6 Mar 2012	Focus group workshop	Younger persons group	05a
12 Mar 2012	Focus group workshop (delivered with Arundel Community Partnership)	Older persons group	05b
April 2012	Town Council Newsletter	All residents	06
July 2012	Arundel NDP Flyer	Local residents	07
21 July 2012	Agenda 21 Newsletter	Local residents	08
24 July 2012	Workshop pilot	Local residents	09
Aug 2012	Communication & Consultation plan	Steering Group	10
Oct 2012	Town Council Newsletter	All Residents	11
4 & 6 Oct 2012	Community Workshop (delivered with Arundel Agenda 21)	Local residents	12 a-d
28 Jan 2013	Planning Workshop(delivered with Arundel Town Council)	Key local stakeholders	13 a-e

These resulted in a whole range of initial ideas (see Appendix 14).

Arundel NDP Consultation Statement

3.3 Community Survey and Housing Needs Survey

See Appendix 15 for the September 2012 Survey Covering Letter

See Appendix 16 for the September 2012 Community Survey

See Appendix 17 for the Housing Needs Survey

See Appendix 18 for the Housing Needs Survey Report

The Surveys were hand delivered to every household in Arundel.

The survey as well as the input from the various focus groups and workshops gave rise to the Arundel NDP State of the Town Report. This was produced in December 2012 and then published in January 2013.

The report was made available on the Arundel Town Council website.

On 10 January Tom Warder, a consultant to the Arundel NDP Steering Group and from Action in Rural Sussex, presented Neighbourhood Plan Process & State of the Town Report to the Town Council. NB All Town Council Meetings are public meetings.

See appendix 19 – 10 January 2013 Arundel NDP Presentation to TC

The State of the Town Report is a comprehensive document, which covered

- a) An introduction to the parish of Arundel and where it sits within two planning authorities (Arun and SDNP) with background to the NDP process.
- b) Parish character with a historical statement and demographics
- c) Parish issues arising from previous consultations, recent focus groups and full community survey.
- d) Current developments, applications and site promotions
- e) Wider contextual issues: NPPF, Local Plans and recent strategic plans/studies/consultations.
- f) A Summary of Key Issues for the Parish of Arundel

See Appendix 20 for the State of the Town Report

Arundel NDP Consultation Statement

3.4 Planning Workshop on State of the Town Report

On 28 January 2013 a further workshop was held at the Town Hall for an invited group of key members of the community representing all sectors (older, younger, ACP, Arundel Agenda 21, Chamber of Commerce, etc.)

In a rotation four groups each looked at four topics at Transport, Housing, Community & Environment to refine ideas and concepts for the first draft of the Submission NDP.

See Appendix 13a – 28 January - Workshop FAQ's

See Appendix 13b – 28 January - Workshop attendees & groups

See Appendix 13c – 28 January - Workshop notes – Transport

See Appendix 13c – 28 January - Workshop notes - Housing

See Appendix 13d – 28 January - Workshop notes – Community & Environment

3.5 James Stewart, Chair of the Arundel NDP Steering Group, presented the Arundel NDP and State of the Town Report to the Arundel Networking Group on 5 March 2013 and answered questions at the Jailhouse, Arundel High Street.

See Appendix 21 – 5 March 2013 Presentation to Arundel Networking Group.

3.6 A working draft of the Arundel Neighbourhood Development Plan was submitted to Arun DC for comments.

See Appendix 22 – 26 March ANDP Working Draft

See Appendix 23 – 17 April 2013 ADC Comments on working draft ANDP

Arundel NDP Consultation Statement

3.7 On 2 May 2013 James Stewart, Chair of the Arundel NDP Steering Group, presented the Draft Pre-Submission Neighbourhood Plan at the annual Town Meeting at the Town Hall. This was attended by approximately 200 local residents.

See Appendix 24a – 2 May Town Meeting Agenda

See Appendix 24b – 2 May Town Meeting Presentation

See Appendix 24c – 2 May Town Meeting Minutes

Then on the 9 May 2013 James Stewart and Tom Warder responded to comments from councilors and accepted proposed changes by the Town Council at the Town Council Meeting in advance of the next stage: June-July Public Consultation.

See Appendix 25 – 9 May Town Council Minutes

3.8 Reg 14 – 28 May to 8 July 2013 Pre-Submission Consultation:

During May notices were sent out for the formal six-week consultation ending on 8 July 2013.

This was sent via email to a list of consultees (see Appendix 26 – List of Consultees for Public Consultation).

The Draft Pre-Submission NDP was also made available at the Public Library, Arundel Town Hall, Arundel Lido and Arundel Surgery as well as on the Town Council Website.

See Appendix 27a – May – June 2013 Reg 14 Communications Plan

See Appendix 27b – May TC Newsletter NDP Flyer notice

See Appendix 27c & d – Town Council NDP Web Pages

All responses were logged as per Reg 14 and responses made.

Responses to the public consultation were received as follows:

- a) 145 comments from the general public and named organisations (NB there are only 69 comments logged because comment number 014 was sent in 77 times from various individual addresses). See Appendix 28 – Jun-July General Arundel NDP Reg 14 Schedule.
- b) ADC – see Appendix 29 - Jun-July Arundel NDP Reg 14 Schedule ADC response
- c) SDNP – see Appendix 30 - Jun-July Arundel Plan Reg 14 Schedule SDNPPA Response
- d) Angmering Park Estate (APE) – see Appendix 31 - Jun-July Arundel Plan Reg 14 Schedule APE Response

Arundel NDP Consultation Statement

3.9 Reg 14: 16 September to 27 October 2013 Revised Pre-Submission Consultation:

As a result of the comments made to the Public Consultation referred to in 3.8 and the availability of a new site for housing (Arundel Castle Stables) it was decided by the Steering Group at their meeting in July that changes required to the plan would be so significant that a Revised Pre-Submission NDP would have to be put out for a second period of public consultation ending on 27 October 2013.

The Revised Pre Submission NDP was presented at and approved by the Town Council on 12 September.

See Appendix 32 – Town council Newsletter
See Appendix 33 – 12 Sept 2013 Town Council Agenda
See Appendix 34 – 12 Sept 2013 Town Council Minutes

The Revised Pre Submission Plan was then sent via email to a list of consultees (see Appendix 26 – List of Consultees for Public Consultation).

The Draft Pre-Submission NDP was also made available at the Public Library, Arundel Town Hall, Arundel Lido and Arundel Surgery as well as on the Town Council Website.

See Appendix 27b – Town Council NDP Web Page
See Appendix 27c – Town Council NDP Key Documents Web page

All responses were logged as per Reg 14 and responses made.

Responses to the public consultation were received as follows:

- a) 31 comments from the general public and named organisations. See Appendix 35 – Sep-Oct General Arundel NDP Reg 14 Schedule.
- b) ADC – see Appendix 36 – Sep-Oct Arundel NDP Reg 14 Schedule ADC response.

See also Appendix 37 - 28 November 2013 ADC Strategic Environmental Assessment Opinion Screening letter.

Section 4 Main Issues and Concerns

4.1 During the process of preparing the Neighbourhood Plan a number of key issues and concerns of the local community and other stakeholders had to be specifically addressed. The Steering Group has been keen to negotiate and resolve as many issues of disagreement as possible prior to completing the submission documentation.

4.2 Those issues that required particular attention are summarized below (in no order):

Flood Risk (various policies)

The Environment Agency (and others) expressed concern in relation to the way in which the Neighbourhood Plan had applied the flood risk sequential and exception tests in its decisions on the allocation of sites for housing. To address these concerns the supporting text to policies 4 and 5 have been amended to make explicit the application of the Sequential and Exception tests. Further, a statement is included in the Site Assessments report that sets out how they have been applied.

Mill House Farm (Policy 9)

Concerns have been raised in relation to the possible provision and suitability of a nursery (as one type of non-residential institution use) on this site and the availability of car parking in the nearby Daisy Field. The original draft policy for the site focused on this specific use, as it was understood that a proposal of this kind was imminent, but the policy support has since been widened to embrace other non-residential institutional and business uses to encourage other proposals. It has not been possible to allay the concerns of near neighbours to the site that the policy making a compromise in terms of access arrangements will lead to a net positive outcome, i.e. a beneficial use for the building. Without it, it is unlikely any new use will be acceptable and the building will remain unused. It will be for any future planning application to demonstrate that the proposals for the building use and for securing off-site car parking are in accordance with development plan policy.

The Gas Works Site (Policy 4)

Policy 4 allocates (inter alia) the “Gas Works” site at Ford Road for the development of housing on this long unused but contaminated site

Arundel NDP Consultation Statement

geographically in the centre of town. Initial focus groups and workshops identified this as a site many people would like to see developed. However, due to its previous use in the production of town gas the site is contaminated. The landowner was concerned that the initial number of dwellings allocated to this site was limited too small to deliver a viable scheme. The policy has therefore been modified to increase the total number of homes to 37 and to indicate there are many potential design solutions for a future scheme. Further, before any development can begin there are various legal issues to be resolved between the land owner (Angmering Estate) and National Grid (via their agents Capita) who currently own the lease on the site. Importantly, the process of engaging these stakeholders as part of the plan has restarted their respective considerations for bringing the site forward for development.

The Blastreat Site (Policy 5)

Concerns were raised over the current usage of the site and the additional strain development of this site under policy 5 would bring. The redevelopment of the site may increase traffic movements on Fitzalan Road and Queens Lane although there will be fewer larger vehicles as a result of the replacement of the industrial use. An increase in traffic movements is not considered to be significant in relation to the overall number of vehicles using Queens Lane and the local highways authority has raised no objection to this policy. The Steering Group has worked hard to engage with the landowners to discuss their future plans; one had made proposals for a housing scheme only in 2010 but had withdrawn them. This has not been possible though it known they are aware of the Neighbourhood Plan proposals but have chosen not to submit a representation to either the Pre Submission or Revised Pre-Submission plans.

'Horses Field' (Policy 10)

"Horses Field" is a space currently used for grazing horses, surrounded on three sides by housing, and on one side by woodlands (within the SDNP). It has a footpath running through it and a number of old trees. Despite not being allocated for housing in the Pre Submission NDP in June 2013, nearly 80 comments were received proposing the protection of this site from housing development. Similar concerns were also expressed at the Town Meeting on 2 May 2013.

This was the result of coincidental developer activity in promoting the site for inclusion in the Neighbourhood Plan. In the light of this situation it was felt necessary to respond positively to the local community's desire to see Horses Field protected from development to propose to designate it as a Local Green Space in accordance with the provisions of the NPPF (para.77). Unsurprisingly, the landowner has objected to that decision.

Castle Stables (Policy 4)

Arundel NDP Consultation Statement

The South Downs National Park Authority has raised concerns that this proposed housing allocation may not be appropriate in the absence of a detailed assessment of the significance of these heritage assets and of the proposals for housing development. The Steering Group was made aware of the potential of this site by the landowner during the consultation period of the Pre Submission Plan (it was not included in that plan) and was keen to use the plan to promote a beneficial use of these important assets. It undertook early consultations with the relevant officers of the Authority to agree the principle of a residential use of the site subject to the design, access and other details being resolved through a planning application and its supporting documentation. It understood from these consultations that the officer view was supportive and agreed to include the site in the Revised Pre Submission Plan. No objections were received from the Authority or English Heritage during the consultation period.

Parking (Policy 6)

Concerns have been raised in relation to parking at the Schools during busy periods, in the town centre and during busy events such as Arundel Festival. Future parking in arrangements will be considered as part of the Parking Strategy for Arundel proposed in Policy 6 (Transport, Access and Car Parking).