

ARUNDEL NEIGHBOURHOOD PLAN REVIEW

NOTE OF TOWN COUNCIL MEETING 11 JANUARY 2017

INTRODUCTION

The purpose of this note is to summarise the discussions and actions agreed at the meeting held to consider if and how the Town Council should embark on a first review (NP2) of the Neighbourhood Plan made in May 2014. It also includes some further reflections since the meeting.

CONTEXT

It was noted that Arun DC had struggled to bring forward and adopt its Local Plan since the making of the NP. The examination of the LP had begun in 2015 but had been suspended pending further analysis and agreement to the objectively assessed need for new homes in the District over the plan period to 2031. This analysis has led ADC to determine that it needs to more than double the number of new homes to be planned for (now 919 homes/annum) over than plan period. As a result, it now has only a 2.12 year supply of housing land, far short of the normal 5 year requirement, and of the 3 year requirement that applies to areas with made NPs with housing allocations, as here.

ADC's intention is to complete a new housing supply strategy for the LP Examination to reconvene later in 2017. It proposes a combination of strategic housing sites, committed NP allocations, its HELAA data and early reviews of made NPs to allocate new sites, to deliver on its new strategy. Of interest, it intends to remove parish-specific housing targets of the draft LP, although arguably these have been more of a hindrance than a help to good neighbourhood plan making.

Arundel is less exposed to the risks of these factors. The November 2016 HELAA identified no new suitable housing land in or around the town that had not already been allocated in the NP (but more on this later). The nearest potential strategic allocation is at Ford/Climping, which although likely to have some effects on traffic entering the town from the south to reach the A27, will not have direct effects.

The greater risk to the town is of planning applications for housing essentially argued on housing land supply deficit grounds to overcome what would otherwise be significant policy constraints. As ADC's housing supply position will not change significantly until the LP is adopted (by the end of 2018?), the bigger risk is that the land interests around the town – essentially the two Estates – will seek to promote the sites submitted for HELAA assessment, even though that document considered them as unsuitable for housing. Or, as has been seen at Fitzalan Road, a developer looks to secure far greater housing numbers than the allocated policy. In each case, their arguments may be strengthened by the failure of all but one of the NP allocations to come forward for planning yet.

It was noted that the town is entirely absent from the policies in the Preferred Options version of the South Downs National Park Local Plan published for consultation in 2015. Its SHLAA report of 2016 assessed four sites on the edge of the town in its area, but either excluded or rejected them all as potential housing sites.

Three of the four were similarly rejected in the NP process in 2013; the fourth (Sawmill at Arundel Park) was not available at that time.

THE SUCCESS OF THE NEIGHBOURHOOD PLAN

It was noted that many of the NP policies had had the effects intended, e.g. the Bevan & Bevan site, Victoria Institute and Lido. In some cases, work was still in progress, e.g. Ford Road. In others, ADC has used some perceived ambiguity in the wording of NP policies to support proposals that ought not have been approved, e.g. retail in the town centre. And there may have been some buildings missing from Policy 13 on local listed buildings.

The Town Council is keen to maintain the focus on encouraging the appropriate reuse of the brownfield sites in the town and on improving the town centre uses, connectivity, parking and appearance for the benefit of local residents and businesses, and of visitors. It was agreed that NP2 may help in maintaining that focus through new policies and refinements of existing policies to improve their effectiveness.

THE VALUE OF A FIRST REVIEW PLAN (NP2)

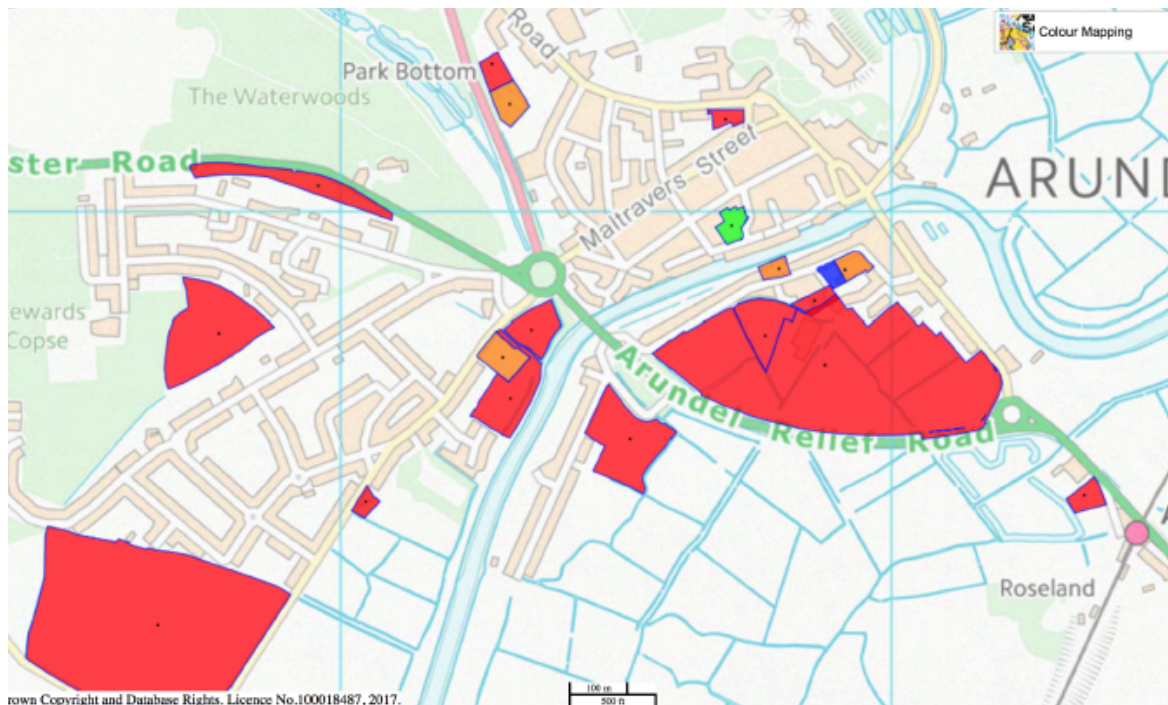
It was noted that NP2 also provides an opportunity for the Town Council to manage the risk of harmful development proposals getting consent because of ADC's vulnerabilities. If that opportunity is to be realised, then the local community is likely to want something in return for accepting new development when it may not be necessary (i.e. there is no Arundel 'target' to meet).

In practice, there seems to be only one option to choose: the 'Land South of Stewards Rise' (HELAA Ref: 66), an 11 Ha site off Ford Road on the southern edge of the town owned by the Norfolk Estate. The HELAA considers the site an unsuitable location for development with flooding and landscape constraints.

In respect of the other main sites, rather unhelpfully, the HELAA fails to acknowledge the NP's Local Green Space designation on Horses Field (Torton Hill Road; Ref: 59) as a fundamental policy constraint and offers a view that the site continues to be suitable for future housing potential.

The large Mill House Farm site (ref: 56) between the town and the bypass has significant flooding and landscape constraints and the land off Fitzalan Road to the south of the bypass (Ref: 57) has similar constraints. There are other small sites that are also all rejected as suitable on those same grounds.

The Ford Road site is large, with a potential capacity of around 200 homes, assuming roughly two thirds of the site is developable (i.e. outside of flood risk and structural landscaping areas). It is legitimate for the NP2 to consider this site and come to another view to the HELAA, its traffic effects on Ford Road and Priory Lane/Torrington Lane, as well as its potential to mitigate its landscape effects, may be difficult to overcome. And, in addition to these policy challenges, the communities of Ford Road/Torton Hill Road may see this site no better suited to new housing than, or worse than, Horses Field.



It may be that an allocation policy will enable the TC to use its policy leverage of NP2 to negotiate a scheme that not only limits the size of the development on the site, but that also delivers specific housing outcomes for the town and makes a financial contribution to town centre improvements to mitigate some of its effects.

It also raises the question of the future of the allocated site on Ford Road (the former gas works) and its surrounding sites (Ref: AB11 and 58). Though the allocation still seems deliverable, the present policy may not be able to do enough to deliver a viable scheme without over-developing the site. The adjoining land remains unsuited to housing due to flood risk, but may be suited to commercial uses. The land lies at the heart of the 'one town' vision but has not seriously been considered for any viable uses until the A27 Bypass is secured. Is there therefore the potential to use the NP2 to assemble two or all three of the sites to deliver complementary retail, business and hotel uses to the town centre, that the town centre itself cannot provide due to its heritage and other constraints? If so, should that proposition form part of a wider strategy for planning all of the southern half of the town - Ford Road, Torton Hill, Jubilee Park and Priory Lane?

In addition to these matters, is there also value via NP2 in reviewing the non-core Arundel Castle property portfolio – Stables, Sawmill etc – in the National Park, to see if there are policy mechanisms that enable the Estate to realise its ambitions, for the economic and social benefit of the town?

NEXT STEPS

The TC faces a difficult dilemma. On the face of it, the risks of unplanned, harmful development are fewer than many other parts of the District. The lack of much available but unconstrained land for development is key to this. But, if the Ford Road, Fitzalan Road and Stables schemes do not happen, despite the encouragement of the NP, it will only have delivered 13 homes in its plan period.

Although some local people may see this as a success, the majority that backed the NP in 2014 may not, as the population will continue to age and to fit a narrower social-economic demographic. The NP sought to halt those trends by promoting new homes suited to younger people and families. This driver is unlikely to have changed in the last three years.

On balance, although it means rejuvenating the enthusiasm of local people to undertake NP2 so quickly after the first NP, there seems plenty for NP2 to correct, refine and add. Although the main stimulus is from the ADC area of the town, it seems sensible to continue with the current neighbourhood area including the SDNPA area to the north.

In terms of next steps, the TC should inform ADC and SDNPA that it does intend to undertake NP2 this year and it should ascertain from Locality if it will qualify for grant aid again (now up to £9,000).

It should then instigate a conversation with local people, businesses and organisations on all the matters summarised in this paper, and others that may arise in the meantime, to test the water on renewing the vision and objectives. The conversation should raise (but not overstate) the new risks facing the town from external factors, but also the consequences of the first NP failing to deliver new homes. This activity will raise the profile of this discussion with land interests, so the TC may need to be ready to act quickly, if there appears to be an appetite for NP2 amongst a majority of those engaged. The formalities of the project should then be addressed with ADC and SDNPA.