



Bersted Neighbourhood Plan

Consultation Statement
Plan Period 2014-2029

Published April 2014

1. Introduction

- 1.1 This consultation statement has been prepared to meet the legal obligations of the Neighbourhood Planning Regulations 2012 in respect of the Bersted Neighbourhood Plan.
- 1.2 The legal basis of the Statement is provided by Section 15(2) of Part 5 of the 2012 Neighbourhood Planning Regulations, which requires that a consultation statement should:
 1. Contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
 2. Explain how they were consulted;
 3. Summarise the main issues and concerns raised by the persons consulted; and
 4. Describe how those issues and concerns have been considered and, where relevant addressed in the proposed neighbourhood development plan

2. Background

In October 2011 the Parish Council agreed that a Neighbourhood Development Plan would be a useful tool to help Bersted maintain its character and give the people of Bersted a voice for how and where they would like future developments in Bersted to be built, designed and located.

A Steering Group was formed consisting of Councillors and members of the public. An information leaflet was distributed to the electorate of the parish in January 2012 with the aspirations of the Steering Group. Replies from the electorate revealed that employment and infrastructure were of greater concern than development. Several public meetings were held in January and February of 2012.

The Steering Group used the services of the Design Council to look at the Trees and Stroud Green Estates, as these are classed as deprived areas, for ways in which they could be improved in the future for residents. The Steering Group had meetings with Officers at Arun District Council and reported to the Parish Council each month. A public information display was held at the April 2013 Electors meeting and at the Parish Festival in June.

The Steering Group had a change of members after some Councillors left in May 2013. The reformed Steering Group continued to look for suitable housing sites and green/open spaces that would need protecting from development.

In August 2013 the Parish Council agreed to employ an outside Consultant to help the Steering Group write the policies for the Bersted Neighbourhood Development Plan. The Steering Group had regular meetings with the Consultant and sent a further survey to all residents in March 2013 stating specific sites that could be used to meet the parish housing allocation. At the same time public open events were

held in five separate locations across the parish where displays were used to provoke debate and gain feedback.

3. Key issues identified during the public consultation

The surveys were sent to 4000 homes and businesses and 691 responses were received which equates to a 17.2% response rate.

Many of the findings are not related to development issues and will be taken forward as part of a Parish Action Plan.

Enterprise and Employment

Total support for policies relating to support for local businesses, increased employment opportunities and improved communication links.

Around 48% of residents work within the Bognor Regis/Bersted area with around 44% out commuting to areas more than 5 miles away.

Building new houses was seen as the least important measure to attract people to work locally. Better roads was seen as important.

Most felt that there were sufficient shops but an additional bank or post office was considered the most needed addition.

Environment and Sustainability

Support for policies relating to improved drainage, protection of historic buildings and trees and maintaining the strategic gap.

4% of homes had been flooded, with 17.42% of gardens being flooded. 59.4% had experienced impassable roads near their home with most believing that the water came from run off from surrounding areas and roads. 12% had experienced sewers backing up and inspection covers lifting.

There was no outright vote for a possible village heart and more work needs to be done on this.

Areas for additional funding provided a mixed response many of the issues need to be looked at through the Parish Action Plan.

Getting Around

Overall support for policies that encourage improved public transport, traffic calming measures and improved footpaths and cycleways.

Traffic calming at The Pink Pub and Rowan Way scored highest. Some more minor roads may need to be considered as residents raised a number of issues.

Speed restrictions and weight and size limits of vehicles were considered the most effective and popular.

Central Parade shops and Durlston Drive shops were viewed as having the worst parking issues.

77.13% stated that walking is their normal method of getting around within Bersted with 31.99% cycling. Bus usage both within and outside of Bersted is high and many would like to see extended operating hours.

57.84% would like to see cycle paths in the parish extended.

Most are happy with street lighting but some roads have issues and these need to be looked at in detail.

Community Leisure and Wellbeing

Support for policies that seek to plan for the ageing population, improve leisure facilities, protect open spaces and improve health care provision.

Bersted Brooks and Jubilee Field are particularly enjoyed by residents.

Most would like to see money spent on a youth club and tree planting and consider improvements are necessary to doctors surgeries and coverage by police and PCSO's.

Both Post Offices are considered important assets.

Most residents use the Durlston Drive doctors surgery. 40.35% waited 1 to 2 days for an appointment with 30.85% waiting 3 to 7 days, 17.09% waiting 8 to 14 days and 11.71% waiting over 2 weeks. Most are reasonably satisfied with their surgery.

34.48% do not have access to an NHS dentist in Bersted.

Housing and Design Quality

82.14% support housing to meet local needs.

97.29% believe that housing should avoid areas subject to flooding and drainage issues.

57.23% support housing on the Bartons School site and 57.51% support housing on the former Rising Sun PH site.

1/2 bedroomed bungalows and 2/3 bedroomed houses are considered most likely to be needed in the future.

50.32% do not support replacement of large houses with several smaller ones.

Land at risk of flooding is considered the most important to protect.

The highest number of respondents were in the 51-64 age range.

Full survey results can be viewed on the parish web site.

4. Statutory Consultees

The Consultation was also carried out with the statutory bodies. Their comments and in particular those from Arun District Council elicited some changes of emphasis or strengthening of wording but no major changes to the policies was required. These are shown in the table below.

Consultee	Comment	Response
Highways Agency	The impact of the proposals in the NP on their own are not likely to impact adversely on the SRN. However our main concern is the cumulative impact of development proposals in the emerging District Local Plan. We are content that given the constancy of the NP with the higher level District Local Plan, that these cumulative impacts are being adequately considered in the District's modelling evidence base	Noted no action required at this time

Consultee	Comment	Response
Natural England	<ul style="list-style-type: none"> • the protection of the countryside corridor (para 2.3.1) and the recognition of the multiple benefits of this area, in terms of landscape/views, biodiversity, agriculture and flood management. These benefits begin to provide a sound framework for coming to a view on any speculative development proposals that may come forward outside the settlement, during the plan period. • the work on the LNR – although there is a wider network of water courses in the area with a range of habitats (including grazing marshes), that present opportunities for biodiversity to be sustained and enhanced through good management, and consequently attractive and interesting places for walkers to use. • the protection of green and open spaces. • Policy ES8 (Trees) – however some reference could be made to other land-cover and habitats • Policy ES10 (Renewable Energy) – but the criteria should ensure consideration of the impact on landscape, views and wildlife 	All noted and added to policies
Southern Water	<p>Suggested amendments to policies ES2, 3 and 4, CLW6 and HDQ1</p> <p>Suggested additional policy relating to infrastructure</p>	All added to the polices
Marine Management Organisation	No comments	No action

<p>Policy ES1 – it is not helpful to require high quality design – what are the specific design requirements for the area? Is there a design guide or village appraisal that could be used to inform applicants about design parameters they would use?</p>	<p>The policy refers to developments conforming to Building for Life 12 which sets out 12 principles of good design that an application should be measured against</p>
<p>Policy ES2: 1st Bullet – Not reasonable, yes these strategies will inform but it doesn't mean everything is not acceptable now. While it is understandable that flooding is an issue of concern, policies must be specifically justified if they are to be as prescriptive as this. You may want to say more about taking positive steps to provide additional flood storage/attenuation in a sympathetic manner. Rather than linking to the completion of the study it would be more appropriate to consider changing this so that it refers to any agreed outcomes or actions resulting from it.</p> <p>5th bullet point: There could be issues with this potentially in terms of recreational disturbance. Is this actually linked to any actions? Clear linkage to intended scheme needed to help any justification or should consider being transferred to a part covering aspirations.</p>	<p>Policy changed to include comments from Southern Water</p>

<p>Policy ES3: This is likely to be dropped by the Government as part of the changes to housing standards. What has it got to do with flooding? Is making people use less water going to stop flooding? There would appear to be no special circumstances for Bersted to require a higher standard of development than nationally required under the building regulations, which is generally code 4 at the moment.</p>	<p>ES3 - The policy is supported by Southern Water. Water discharge affects flooding.</p>
<p>Policy ES4: What additional detail does this add to ADC local plan policy? Does it add any value?</p>	<p>Yes because ADC has allowed development in the Strategic Gap at Eastergate so it is felt that additional strength needs to be given.</p>
<p>Policy ES6: What additional detail does this add to ADC local plan policy? Does it add any value?</p>	<p>No but we are happy with it.</p>
<p>Policy ES7: it is not clear if this only applies to buildings where there is a historic context – it may not be justified otherwise. Is this for all development locations, in which case it is too restrictive, if it's for CA's and the setting of LB's then it needs to be worded better.</p>	<p>That is why it says appropriate to the historic context. If there is no historic context it will not apply.</p>
<p>Policy ES8: Are there specific trees that are of concern? This appears to be more all-embracing than can be justified locally.</p>	<p>Don't agree. Retaining trees is important to the parish</p>

<p>Policy ES9: No real justification provided – have you done any work to understand whether this is viable (hence why Govt haven't introduced it). Requiring code 5 rising to 6 is in excess of current building regs. What is the justification? This will be strengthened if sufficient evidence is shown. Have you thought of implementation of this policy?</p>	<p>This policy has been allowed by the examiner of the Thame NP.</p> <p>Our policy makes it clear that Listed Buildings have separate safeguards.</p> <p>The ADC Strategy was only available on the ADC web site from the 19th March 2014 after we had completed our submission. The previous Plan supported our approach.</p> <p>ADC has a target to contribute towards reducing Greenhouse gas emissions in buildings by at least 20% of 2010 levels by 2027 as part of the UK carbon plan. The NP seeks to assist with this target which is locally an important issue for a coastal area threatened with rising sea levels.</p>
<p>Policy EE4: This mentions policy SP6 (Hierarchy of Centres), it is recommended that all references such as this should be changed to the names of the policies rather than using the numbers to ensure that they are not overtaken or outdated as the references change with iterations of the emerging Local Plan. This is a clear example of this as it was actually in the 2012 consultation version of the Local Plan. It is unknown where the phrase "convenience and destination appeal" comes from but this is not contained in any version of this policy as contained in any versions of the emerging Local Plan.</p>	<p>Remove words - Local Plan policy SP6</p>
<p>Policy CLW1: As with many of the policies this does not add any detail and in fact has less than the equivalent policy contained in the emerging Local Plan.</p>	<p>The policy explains this in the narrative</p>

<p>Policy CLW5: The Assets of community value paragraph is incorrect as it reads like there are ACV's in Bersted but currently there are none. This policy should either be removed or revised once you have been through the process of having the proposed Assets designated. ADC welcomes the initiative of adding these buildings as assets of community value, although as it goes the list is not even in this consultation, hence not being consulted on. The parish council should ensure they register the buildings using the ADC procedure to mitigate any unwanted circumstances in the future. The NDP group through the parish council should seek to nominate the buildings which they wish to be listed as Assets of Community Value to make this policy viable. Please see the procedure to embark on this. http://www.arun.gov.uk/main.cfm?type=ASSETSOFCOMMUNITYV</p> <p>It is important to differentiate between land use policies which should be your planning policies and other inspirational/community projects which have been identified as a result of the NDP work. This perhaps should be in the community projects section.</p>	<p>As ADC are aware it is not possible to add the list until the full consultation is over. In any event ADC Land Charges has made it clear that any asset put forward will be added to the list so it is irrelevant. The policy will remain and the list added before the final submission. Two buildings have been identified and an application made tot ADC to add them to the register.</p>
<p>Policy CLW6: There is no list in an Appendix and no map showing these so unable to comment on this policy at present. However might question if the stated justification is really sufficient, they should be linked to the NPPF reasons/justifications.</p>	<p>List now provided. All areas are shown as protected in the emerging Local Plan Feb 2014.</p>
<p>Policy CLW7: There is no list and no map detailing these so unable to provide any comment at present.</p>	<p>List now provided. All areas are shown as protected in the emerging Local Plan Feb 2014.</p>

<p>Housing and Design Quality Objective: This does not seem to be the clearer objective listed within the Policy Index table. It seems to mix elements of justification and supporting text to a policy in with a small aspect of the objective.</p>	<p>Objective tweaked</p>
<p>Housing & Housing Design – section states intention to provide housing to meet local needs. This can conflict with ADC policy on housing allocation which enables all households on our housing register to bid for affordable homes in our Choice Based Lettings (CBL) system.</p>	<p>This policy was agreed with Andy Elder of Arun DC before it was written. Local priority is a big issue amongst residents who meet people from London and other areas who have moved into affordable housing in Bersted.</p>
<p>There are a few mentions of the Code for Sustainable Homes which the government has announced it intends to scrap this year with environmental standards being included in the revised Building Regulations. This should be considered.</p>	<p>This has been approved at Thame and at the time of publication the Code still stands.</p>
<p>17. Additional Homes – to be market, affordable and for sheltered accommodation but no proposed proportions, which would be useful.</p>	
<p>Policy HDQI: Reading the whole of this policy is it 25 or 30 dwellings that are being allocated? The figures of the two sites add to 30 but they only refer to 'up to 25' in the policy title and wording. It is suggested that seeking to restrict new development to 'up to 25 new homes does not comply with the NPPF's presumption in favour of sustainable development. The wording needs to change to 'a minimum of 25' rather than 'up to'. As currently written there is no justification or explanation for the 25 when the allocation is 50. This needs to be clearly documented; it is not coherent as it is.</p>	<p>Explained under the objective</p>

<p>Policy HDQ2: Local Connection to the parish- This policy conflicts with ADC policy. ADC only has a local connection criterion for rural exception sites so this would not be supported by ADC.</p>	<p>This policy was agreed with Andy Elder of Arun DC before it was written. Local priority is a big issue amongst residents who meet people from London and other areas who have moved into affordable housing in Bersted.</p>
<p>Policy HDQ3: visually integrated to their surroundings. It is not always possible or necessary for new homes to supposedly visually integrate.</p>	<p>That is not a reason to not try.</p>
<p>10. 4: What does this mean? Clarity required.</p>	<p>Discussions at the various events across this and other parishes has provided information that as we are all living longer and are active longer, older people do not want to move into “granny flats’ but want smaller bungalows/houses with a small garden. There are limited numbers of such properties available to them.</p>
<p>Policies HDQ3, HDQ4 and HDQ10: These policies whether within the Policy Index table or individually seem to basically be covering the same point, as well as the very first policy ES1. In addition, they do not seem to add any refinement to the existing design policies either of the existing Local Plan or the emerging one.</p>	<p>Residents are not happy with what they perceive as the new housing estate ‘dumped’ on the outskirts of Bersted and having little visual or physical connection to the parish. These policies seek to ensure that this does not happen in the future.</p>
<p>Policy HDQ5: This policy both does not really refine the policies of the emerging plan in particular or the existing and also it seems to have a contradiction, as it refers to needing a mix but then wants to insist that there is specific elderly provision. However this is again confused by the fact that there is an inferred realisation that this will not always be applicable as it is currently written.</p>	<p>There is a mix of housing overall as the current developments on Policy Site 6 are primarily houses and the new approval for 25 homes in North Bersted Street is also for houses, therefore, a wish for accommodation to suit the growing elderly population would provide a balance’.</p>
<p>Policy HDQ6: This states at the end ‘as set out in the policies’ Which policies is this referring to as there is nothing within the supporting paragraph to explain.</p>	<p>Just add the words ‘in this Plan’</p>

<p>Policy HDQ7: What local character in particular?</p>	<p>Each site on its merits as stated in 10.6 - reflect the character of the location</p>
<p>Policy HDQ8: If there is a shortage of units for elderly to downsize to? Then providing them with gardens to manage seems to possibly defeat the purpose. This perhaps needs more evidence.</p>	<p>It is a fact that comes out of all discussion across the district that elderly people are fed up of the offering of old persons flats that ADC allow. They want bungalows with two bedrooms and a small garden. The elderly are fitter and more active than they used to be.</p>
<p>10.7: Rather vague –why not specify a minimum garden size?</p>	<p>Not vague. It depends upon the location within the parish. A new house in Chichester Road where the plot are mostly large would require a larger outdoor space to fit into the location than one on Stroud Green Drive.</p>
<p>Policy HDQ9: Aren't these normal planning matters for any new development?</p>	<p>You would like to think so but experience of ADC planning and design would suggest a need to reinforce the point.</p>
<p>Policy HDQ11: somewhat contradictory policies – if there is a problem with too many cars then why propose minimum of 2 spaces per dwelling which will only make the matter worse?</p>	<p>The policy is not suggesting too many cars merely not enough parking space.</p>
<p>Policy GA1: Blunderbuss approach – threshold too low – do you have any specific proposals?</p>	<p>What is that supposed to mean? This policy has been allowed in Thame and not commented upon in this manner for the Felpham or Barnham and Eastergate plans. Will change the emphasis.</p>
<p>I note that there is a suggestion of 25 dwellings for the Bartons Infant school site, whereas 15 dwellings have been identified in the SHLAA appraisal for the site. What is the evidence for a higher figure?</p>	<p>We don't have any other sites. The figure has been reduced to 20 and justified.</p>

<p>Para 2.2.2: Referring to most of the Parish lying within Flood Zone 3 is very strong considering it is only in the n-ne of the Parish, mainly around the Rifes. It is suggested that this is amended as follows: 'Most of North Bersted Sections in the North to North East of the Parish lies within Flood Zone 3...'</p>	<p>A map will be included</p>
<p>Para 2.3.2 ref Bersted Brooks LNR: It reads as though the Friends of Bersted Brooks Manage this site. This is not the case. They work in partnership with ADC who own and manage the site to enhance it and support the management of it. The majority of tree planting was funded and carried out by ADC.</p>	<p>Amended</p>
<p>3rd para of 4.1.1 Traffic/Road Systems</p> <p>The information in this para needs to be updated to take account of the latest evidence base documents. Particularly the IFS from 2009 has been replaced by the IDP which included the BRRR and the suggested areas for growth, including BREQ, as was always one of the most likely growth areas.</p>	<p>This is not policy but background.</p>
<p>Para 5.1: One sports pitch referred to at Bersted Green – This site is commonly known as Laburnum Recreation Ground and is managed by ADC. It has provision for 2 x mini soccer pitches.</p>	<p>Changed but it is known by all residents as Bersted Green playing fields</p>
<p>It is noted that there is no appendix in relation to areas designated as green space/open space at this stage. It would be helpful if there was so that it could be consulted locally.</p>	<p>Duplicate</p>
<p>Para 6.4: The reference to the Aldingbourne Rife in the last sentence should be corrected to be capitalised. Amend as follows: "...from the Aldingbourne Rife and..."</p>	<p>Typo</p>

<p>Para 6.5: The justification for this still seems weak and should be strengthened. Though you may feel that it is justified, you need to ensure that you are not being too restrictive to development and if taken literally then this para is really suggesting it should be higher, but there are distinct viability issues that would arise. It is suggested that an acknowledgement of the potential impact on viability is mentioned within supporting text as the current wording as justification is not considered to be strong enough.</p>	<p>Happy with it. Supported by Southern Water.</p>
<p>There is no para 8.15 contained as suggested at the end of this para. Reference to 8.15 needs to be removed or amended to refer to the correct one.</p>	<p>Final doc change</p>
<p>Para 6.13: The energy Efficiency Strategy that is referred to, was replaced by a new one that went to Cabinet and was signed off in December 2013. It is suggested that this whole paragraph needs reviewing. Please discuss with ADC.</p>	<p>Only out on the ADC web site after we had completed our draft.</p>
<p>All references to the resolution over the reinstatement of the Bognor-Chichester gap was agreed by Council at the 8th Jan meeting.</p>	<p>Addressed elsewhere</p>

There are a number of sections that are not complete sentences and there are sections which not make sense - see examples below.

Page 5, Above 2.8

Plan A should be reformatted in the document because it is not legible.

Page 18

The formatting of the boxes need to be reconsidered, as they are difficult to read and they are not logical.

Page 5, between 2.2.2 and 2.2.3

Space required in

Page 21, 4.2

The section in bold should be revised because affordable and sheltered accommodation are all residential so the sentence does not make sense.

4|of 6

'The identification of land/site(s) for possible future housing sites based on housing need, location, appropriateness and availability. This not necessarily to be purely residential but a mix of affordable and sheltered accommodation based on the needs of the residents of Bersted'

The Monitoring and Review (Page 22 4.7): is insufficient as it does not provide a

robust methodology of how the objectives and changes in the parish will be monitored in the plan period. The Parish Council has a responsibility to review the Plan and this is not included within the plan.

Once again no mention of this on any other Plan - wording changed

The draft Plan was assessed against emerging plans where support of a planning professional was being used. Minor changes were made but once again this process did not change the already approved and consulted on draft policies.

Throughout the process Bersted Parish Council have worked with the support of Arun District Council.

The Plan now goes to ADC for their Public Consultation.

5. List of Consultees

West Sussex County Council
Arun District Council
Natural England
The Environment Agency
English Heritage
Network Rail
The Highways Agency
Marine Management Organisation
NHS Coastal West Sussex CCG
Southern Electric
British Gas
Southern Water
Sussex Police

Residents and businesses of Bersted



Bersted Neighbourhood Development Plan – Pre-submission **Pre-submission consultation 19th February to 2nd April 2014**

Arun District Council (ADC) comments

The comments are reflective of comments from all departments of ADC

The comments are to be approved by the Assistant Director Planning and Economic Regeneration or his nominated representative prior to submitting to The Parish before the end of the consultation period.

(approved on 27th March and emailed to Bersted 31st March)

The Council fully supports the community's initiative to produce a Neighbourhood Development Plan. Neighbourhood planning aims to give people greater ownership of plans and policies that affect their area. The government is clear that the intention of Neighbourhood Development Plans should be to set out policies on the development and use of land in a neighbourhood area and that the local planning authority has a duty to support production of the plan.

Our duty at this stage is therefore to assist the Bersted Neighbourhood Plan Group in making sure the draft you subsequently submit to us is in a form that will allow the Examiner at a forthcoming examination recommend that it goes ahead to referendum. The comments are reflective of comments from all departments of Arun District Council. These comments do not contain our comments on Strategic Environmental Assessment – these are provided separately.

ADC pre-submission comments

We have tried to outline the areas where there may be some degree of divergence with national or local planning policy, to help you in preparing justification for these departures. The following list is intended to be a guide on some key issues identified in the plan:

1. There is general concern that the policies appear to lack justification, and are unduly constrictive/specific, and there is little local specificity, ie little clarity of what it is that the NP is trying to achieve for the local community. For example:
Policy ES1 – it is not helpful to require high quality design – what are the specific design requirements for the area? Is there a design guide or village appraisal that could be used to inform applicants about design parameters they would use?
2. **Policy ES2:** 1st Bullet – Not reasonable, yes these strategies will inform but it doesn't mean everything is not acceptable now. While it is understandable that flooding is an issue of concern, policies must be specifically justified if they are to be as prescriptive as this. You may want to say more about taking positive steps to provide additional flood storage/attenuation in a sympathetic manner. Rather than linking to the completion of the study it would be more appropriate to consider changing this so that it refers to any agreed outcomes or actions resulting from it.

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 4. **Policy ES4:** What additional detail does this add to ADC local plan policy? Does it add any value?
 5. **Policy ES6:** What additional detail does this add to ADC local plan policy? Does it add any value?
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<http://www.arun.gov.uk/main.cfm?type=ASSETSOFCOMMUNITYV>
- It is important to differentiate between land use policies which should be your planning policies and other inspirational/community projects which have been identified as a result of the NDP work. This perhaps should be in the community projects section.
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20. **Policy HDQ3:** visually integrated to their surroundings. It is not always possible or necessary for new homes to supposedly visually integrate.
21. **10. 4:** What does this mean? Clarity required.
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28. **Policy HDQ9:** Aren't these normal planning matters for any new development?
29. **Policy HDQ11:** somewhat contradictory policies – if there is a problem with too many cars then why propose minimum of 2 spaces per dwelling which will only make the matter worse?
30. **Policy GA1:** Blunderbuss approach – threshold too low – do you have any specific proposals?
31. I note that there is a suggestion of 25 dwellings for the Bartons Infant school site, whereas 15 dwellings have been identified in the SHLAA appraisal for the site. What is the evidence for a higher figure?

32. **Para 2.2.2:** Referring to most of the Parish lying within Flood Zone 3 is very strong considering it is only in the n-ne of the Parish, mainly around the Rifes. It is suggested that this is amended as follows:
~~'Most of North Bersted~~ **Sections in the North to North East of the Parish lies within Flood Zone 3...**
33. **para 2.3.2 ref Bersted Brooks LNR:** It reads as though the Friends of Bersted Brooks Manage this site. This is not the case. They work in partnership with ADC who own and manage the site to enhance it and support the management of it. The majority of tree planting was funded and carried out by ADC.
- 34. 3rd para of 4.1.1 Traffic/Road Systems**
 The information in this para needs to be updated to take account of the latest evidence base documents. Particularly the IFS from 2009 has been replaced by the IDP which included the BRRR and the suggested areas for growth, including BREQ, as was always one of the most likely growth areas.
35. **para 5.1:** One sports pitch referred to at Bersted Green – This site is commonly known as Laburnum Recreation Ground and is managed by ADC. It has provision for 2 x mini soccer pitches.
36. It is noted that there is no appendix in relation to areas designated as green space/open space at this stage. It would be helpful if there was so that it could be consulted locally.
37. **Para 6.4:** The reference to the Aldingbourne Rife in the last sentence should be corrected to be capitalised. Amend as follows: "...from the Aldingbourne **R**rife and..."
38. **Para 6.5:** The justification for this still seems weak and should be strengthened. Though you may feel that it is justified, you need to ensure that you are not being too restrictive to development and if taken literally then this para is really suggesting it should be higher, but there are distinct viability issues that would arise. It is suggested that an acknowledgement of the potential impact on viability is mentioned within supporting text as the current wording as justification is not considered to be strong enough.
39. There is no para 8.15 contained as suggested at the end of this para. Reference to 8.15 needs to be removed or amended to refer to the correct one.
40. **Para 6.13:** The energy Efficiency Strategy that is referred to, was replaced by a new one that went to Cabinet and was signed off in December 2013. It is suggested that this whole paragraph needs reviewing. Please discuss with ADC.
41. All references to the resolution over the reinstatement of the Bognor-Chichester gap was agreed by Council at the 8th Jan meeting.
42. All mentions of the Energy Efficiency Strategy 2009-2013 should be replaced with the new strategy, which is the 2014-2017 one.
43. There are a number of sections that are not complete sentences and there are sections which not make sense - see examples below.
- Page 5, Above 2.8
 Plan A should be reformatted in the document because it is not legible.
- Page 18
 The formatting of the boxes need to be reconsidered, as they are difficult to read and they are not logical.
- Page 5, between 2.2.2 and 2.2.3
 Space required in
Page 21, 4.2
- The section in bold should be revised because affordable and sheltered accommodation are all residential so the sentence does not make sense.

'The identification of land/site(s) for possible future housing sites based on housing need, location, appropriateness and availability. This not necessarily to be purely **residential but a mix of affordable and sheltered accommodation based on the needs of the residents of Bersted'**

Page 21 4.3, - 4.6

These sections do not form complete sentences and this should be revised.

44. **The Monitoring and Review (Page 22 4.7)**: is insufficient as it does not provide a robust methodology of how the objectives and changes in the parish will be monitored in the plan period. The Parish Council has a responsibility to review the Plan and this is not included within the plan.

Conclusion

There is concern that numerous policies in the plan appear to be more generic than specific. They suggest that there is a lack of definition of what the plan is trying to achieve, other than 'development should be as good as possible', and this is not helpful to either applicants, as it gives them no clear steer, or to the community, as it gives an unrealistic expectation that the plan can achieve effective control when in practice this is unlikely if insufficient evidence is given. A plan with generic policies and little local justification is unlikely to be effective in controlling development.

It is strongly recommended that an independent pre-examination check be done as we are very concerned at the substantial amount of comments we have had to make at this stage. We feel that the plan could be enriched through a complete review. It may be prudent to get additional support via the Locality support. We are also able to offer assistance should you require us to.

We have made the suggestions in this document in the spirit of easing the draft plan's progress to adoption, and they should not be taken as the District Council requiring or requesting changes to the document, as ultimately any decisions over the eventual contents and whether to take comments on board rest with the Bersted Neighbourhood Plan Group.

The Council fully supports the community's initiative to produce the neighbourhood Development Plan and welcome any further discussions on the comments made.

DELEGATED AUTHORITY: NEIGHBOURHOOD DEVELOPMENT PLANS

The Neighbourhood Planning (General) Regulations 2012 - Parts 5 and 6

Background:

Arun's constitution sets out how the Council operates, how decisions are made and the procedures that are followed; to ensure that decisions are efficient, transparent and accountable to local people.

A key priority of the Council is to draft and adopt the Local Plan in order to appropriately guide and manage growth across the District. Recent changes to the plan making system include the introduction of the Localism Act, which also makes provision for Neighbourhood Development Planning. To reflect the changes to the plan making system, and to clarify the roles of committees and alterations were made to the constitution in relation to Neighbourhood Development Planning functions for reasons of expediency.

Current delegated Authority as set out in the Constitution:

Under Part 4- Officer Scheme of Delegation, Section 2 paragraph 5.24

Neighbourhood Development Plans (Date of revision: January 2014)

The Assistant Director Planning and Economic Regeneration or other Designated Officer shall be responsible for all planning matters relating to Neighbourhood Development Planning under The Neighbourhood Plans (General) Regulations 2012 - Parts 5 and 6.

Exercise of delegated authority by the Assistant Director Planning and Economic Regeneration:

In accordance with the above, the Assistant Director Planning and Economic Regeneration or his nominated representative hereby authorises:

Comments on Bersted Reg.14 Pre-submission

Signed:

.....

Assistant Director Planning and Economic Regeneration

Date:

.....

Our ref:
Your ref:

Fiona Dobbs
Council Offices
The Community Centre
Chalcraft Lane
Bognor Regis
West Sussex
PO21 5TU

Elizabeth Cleaver
Federated House
London Road
Dorking RH4 1SZ

Direct Line: 01306 878805

1 April 2014

Dear Ms Dobbs,

BERSTED PARISH COUNCIL NEIGHBOURHOOD PRE-SUBMISSION PLAN 2014-2029

Thank you for inviting the Highways Agency to comment on the Bersted Parish Council Neighbourhood Pre-submission Plan.

The Highways Agency is an executive agency of the Department for Transport. We are responsible for operating, maintaining and improving England's strategic road network (SRN) on behalf of the Secretary of State for Transport. In the case of Bersted Parish, we would be concerned if proposed development impacted adversely on the safe and efficient operation of the A27.

Having reviewed the Neighbourhood Pre-Submission document, we are content that the neighbourhood Plan is generally consistent with the emerging Arun District Local Plan with 50 new homes in the Parish being allocated in the emerging ADC Local Plan. The impacts of proposals in the Neighbourhood Plan on their own are not likely to impact adversely on the SRN. However, our main concern is the cumulative impact of development proposals in the emerging District Local Plan. We are content that given the consistency of the Neighbourhood Plan with the higher level District Local Plan, that these cumulative impacts are being adequately considered within the District's modelling evidence base.

I hope this is helpful. Please do not hesitate to get in touch should you have any questions in relation to the SRN.

Yours sincerely



Elizabeth Cleaver
NDD South East Asset Development
Email: elizabeth.cleaver@highways.gsi.gov.uk



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By email: clerk@bersted-pc.gov.uk

Our reference: 506

19 March 2014

Dear Sir/Madam,

Re: Bersted Parish Council Neighbourhood Pre-Submission Plan

Thank you for inviting the Marine Management Organisation (MMO) to comment on the above consultation. The MMO has reviewed the document and whilst we have no specific comments to make we would like to draw your attention to the remit of our organisation as you may wish to be aware of this in relation to the consultation.

As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring mark there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. In our duty to take all reasonable steps to ensure compatibility with existing development plans, which apply down to the low water mark, we are seeking to identify the 'marine relevance' of applicable plan policies. The MMO began planning for the east area in April 2011. The next round of planning, in the south plan area, began in 2013. The south plan area runs from Folkestone to the River Dart and therefore includes Bersted. The MMO will be working with all local councils in the plan area and until such time as a marine plan is in place we advise local councils to refer to the Marine Policy Statement for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the UK Marine Policy Statement unless relevant considerations indicate otherwise. The Marine Policy Statement will also guide the development of Marine Plans across the UK. More information can be found at <http://www.defra.gov.uk/news/2011/03/18/marine-policy-statement/>

The MMO is responsible for issuing marine licences under the Marine and Coastal Access Act 2009. We also issue consents under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts and are a Statutory Consultee to the Planning Inspectorate for relevant Planning Act developments (Nationally Significant Infrastructure Projects). A marine licence may be needed for activities involving a deposit or removal of a substance or object below the mean high water springs mark or in any tidal



From: clerk clerk@bersted-pc.gov.uk 
Subject: FW: 113472 - Bersted NP - Pre-submission
Date: 27 March 2014 07:53
To: Gill Yeates GYeates@westside-supplies.co.uk, PAllsopp@aol.com, Wendy Kapp wendykapp@waitrose.com, Philippa Seager philippa.seager@foredia.com, Mike Shadbolt mikeshadbolt@sky.com, councilorjonathan.spencer@yahoo.co.uk
Cc: Maureen Chaffe processmatters2@gmail.com

FYI

From: Lister, John (NE) [mailto:John.Lister@naturalengland.org.uk]
Sent: 26 March 2014 16:15
To: clerk@bersted-pc.gov.uk
Subject: 113472 - Bersted NP - Pre-submission

Attn - Fiona Dobbs

Dear Fiona

Thank you for consulting Natural England on your Neighbourhood Plan. My brief comments are as follows - we welcome:

§ the protection of the countryside corridor (para 2.3.1) and the recognition of the multiple benefits of this area, in terms of landscape/views, biodiversity, agriculture and flood management. These benefits begin to provide a sound framework for coming to a view on any speculative development proposals that may come forward outside the settlement, during the plan period.

§ the work on the LNR – although there is a wider network of water courses in the area with a range of habitats (including grazing marshes), that present opportunities for biodiversity to be sustained and enhanced through good management, and consequently attractive and interesting places for walkers to use.

§ the protection of green and open spaces.

§ Policy ES8 (Trees) – however some reference could be made to other land-cover and habitats

§ Policy ES10 (Renewable Energy) – but the criteria should ensure consideration of the impact on landscape, views and wildlife

Due to the current pressure of consultations on land-use plans, I have not been able to spend the time I would have wished reviewing and commenting on your Plan. Nevertheless, I hope you find these comments helpful.

If there are issues I have not covered, please let me know and I will respond as quickly as possible. If discussion would be helpful, please give me a call.

If you wish to comment on the service provided by Natural England please use the appended form.

From: PlanningSSD [<mailto:PlanningSSD@environment-agency.gov.uk>]

Sent: 02 April 2014 11:06

To: clerk

Subject: RE: Bersted Parish Council Neighbourhood Pre-Submission Plan

Thank you for consulting the Environment Agency on your Draft Neighbourhood Plan. We are a statutory consultee in the planning process providing advice to Local Authorities and developers on pre-application enquiries, planning applications, appeals and strategic plans.

Together with Natural England, Heritage and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at:

<http://publications.environment-agency.gov.uk/PDF/GEHO0212BWAZ-E-E.pdf>.

We aim to reduce flood risk, while protecting and enhancing the water environment. We have had to focus our detailed engagement to those areas where the environmental risks are greatest.

We note that the housing allocation at land at Bartons Infant School is for 25 dwellings. This site incorporates all flood zones, 1, 2 and 3. Flood zones 2 and 3 have a medium and high risk of flooding respectively as set out within the National Planning Policy Framework (NPPF).

In accordance with the NPPF paragraph 100-102, we recommend the Sequential Test is undertaken when allocating sites to ensure development is directed to the areas of lowest flood risk.

The Sequential Test should be informed by the Local Planning Authorities Strategic Flood Risk Assessment (SFRA).

We would have concerns if development is allocated in this flood zone without the Sequential Test being undertaken.

We would also advise that, should this site go forward, the sequential approach should be taken on site whereby the development classified as 'more vulnerable' under the NPPF should be located in the areas of lowest flood risk.

It is important that your Plan also considers whether the flood risk issues associated with these sites can be safely managed to ensure development can come forward. Without this understanding we are unsure how your Plan can demonstrate compliance with the NPPF.

Kind Regards
Sustainable Places
Environment Agency
South East Region
Solent & South Downs Area
Solent Office

Yours sincerely

John Lister

Lead Adviser

Land Use Services Team - Ashford

Natural England

Mobile - 0790 060 8172

www.naturalengland.org.uk

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

 Natural England is accredited to the Cabinet Office Customer Service Excellence Standard



river to the extent of the tidal influence. Any works may also require consideration under The Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended) and early consultation with the MMO is advised. We would suggest that reference to this be made within planning documents to ensure that necessary regulatory requirements are covered. We would encourage applicants to engage early with the MMO alongside any application for planning consent to ensure that the consenting process is as efficient as possible.

If you have any questions or need any further information please just let me know. More information on the role of the MMO can be found on our website www.marinemangement.org.uk

Yours sincerely

A handwritten signature in black ink, appearing to read 'A. Atkinson', is displayed on a light blue rectangular background.

Angela Atkinson
Strategic Intelligence Officer

E stakeholder@marinemangement.org.uk