

## **A Commentary on The Littlehampton Neighbourhood Plan pre-Submission Draft**

**Version 1.2 - 10<sup>th</sup> July 2013**

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### **What is this about?**

This Commentary has been put together as a compilation of points raised on the draft Littlehampton Local Neighbourhood Plan by various people both in the Charter group and who attended public meetings. It is non-Party, it's not restricted to any age-groups, parts of the Town, or Civil / Business interests, anyone can take part and help, in fact that's exactly what the aim is. To get everyone to contribute.

This is not a finished document, it's just suggestions and comments that may help you assess whether the pre-Submission Draft does in fact fairly represent the views and consensus of the Littlehampton Community of Residents and Business.

New material will be added if you think points have been missed.

### **Structure of this Commentary**

*Points in the Plan that you might think about and comment on:*

#### **1. Errors and omissions that should be made good to remove doubt**

- a. *Disagreements between Policy Map and Policies*
- b. *What are the 'designated environmental features of the town ... identified in the Neighbourhood Plan and in section 4 of the Strategic Environmental Assessment (SEA)*
- c. *Glossary points to incorrect Appendix References*
- d. *Incorrect Use Class proposals for seafront Hotel*

#### **2. Questions that need to have satisfactory answers before the Community can give support**

- a. *What are the factors bringing about the requirement for major growth in the housing provision, what kind of people (demographic) are expected to occupy the new homes, and how much of the new associated facilities (schools, health, employment, shopping) is due the make-up of the new population?*
- b. *How much consideration is being given to Flood and Groundwater issues in deciding Housing Land acceptability?*
- c. *What is included in the named Green Spaces?*
- d. *On what basis is the demand for new Hotel Bedspaces assessed?*
- e. *How does the LNP interface with the proposal for an Economic Improvement Area in the Local Plan?*
- f. *Is the Submission Draft Plan likely to be revised to include new proposals for Housing Allocation hitherto unseen and unconsulted?*

**Points that need to be clarified**

- g. What is the Strategic Green Link?*
- h. What is the future of the existing Health Centre, and what is the scope, capacity and localities served by the proposed health facility close to the A259? And whether additional business premises will be approved to compensate?*
- i. What is meant by 'adjoining land' and 'Policy 5' in connection with the former Hospital Site and Health Centre site in Church Street / Fitzalan Road? Should the Library be registered as an Asset of Community Value?*
- j. Will Health and Medical capacity grow with the anticipated Population Growth or simply re-locate?*
- k. How is income calculated from the Community Infrastructure Levy?*

**3. Policies or topics that are not included which can / should be added without changing any specific policy already in the Plan**

- a. A Health Facilities Policy*
- b. An expanded Housing Land Policy that allows for development of more creative ways of providing Affordable Homes and Homeless Accommodation, other than simply relying on Housing Associations*
- c. A schedule of Assets of Community Value*
- d. A schedule of all open spaces and associated infrastructure of significance*
- e. An evaluation of the Visual qualities of the parts of the Town and a statement of what is essential, what is desirable and what improvements would be encouraged*
- f. Inclusion of surrounding green areas outside the built-up townscape with statements of their value*

**4. Additional policies or topics which would broaden the scope of the Plan to the Town's advantage**

- a. A fuller approach to Employment premises and Land, to include consideration of a wider range of trades and occupations*
- b. A Holiday Trade policy to include Holiday Accommodation and various smaller-scale Facilities and Provision as well as the larger Leisure Industry*

**5. Points that are not acceptable**

- a. Explicit support for Hotel at Windmill Theatre site*
- b. Explicit support for Housing at Swimming Sports Leisure Centre site*

**6. Policies that are so new and radical that a full public presentation and explanation and discussion is required before the Community can give support**

- a. West Bank Policy*

**Aspects of the Plan which seem particularly commendable**

**Why the Community Needs to Participate**

**Final Decision – is the Plan really the Community's View?**

**Point-by-point (almost) Commentary on Policies and Sections of the Plan**

## Points in the Plan that you might think about and comment on

*Please refer also to the Commentary on the Policies towards the end of this document to see the context. There is some repetition, but that is intended to reduce the need to flip to and fro between sections.*

### 1. Errors and omissions that should be made good to remove doubt

(this list may not be exhaustive)

#### ***Disagreements between Policy Map and Policies***

In particular the extent of the site relating to the Windmill Theatre

#### ***What are the 'designated environmental features of the town ... identified in the Neighbourhood Plan and in section 4 of the SEA' ?***

The section appears to be missing, but should be included

#### ***Glossary points to incorrect Appendix References***

In particular the reference to the list of Assets of Community Value

#### ***Incorrect Use Class proposals for seafront Hotel***

Not D1

### 2. Questions that need to have satisfactory answers before the Community can give support

***What are the factors bringing about the requirement for major growth in the housing provision, what kind of people (demographic) are expected to occupy the new homes, and how much of the new associated facilities (schools, health, employment, shopping) is due the make-up of the new population?***

In drawing up the Plan, with advice from the District Council, the Town Council Planning and Transport Group will have had a ready-formed agenda for including the large tranches of housing we see included in the Neighbourhood Plan.

The draft Plan says *"there (was) the possibility of choosing options proposing a significantly lower or higher housing supply target. These options were not assessed, as neither was considered plausible..."*.

On the other hand, much of the Community will not feel comfortable with this kind of intensification, or have much enthusiasm to support such large developments because it is likely to have a degrading effect on those qualities (trumpeted in both Local and Neighbourhood Plans) that brought them, or made them enjoy living, here in the first place.

A large proportion of the infrastructure, educational, employment and open space provision identified in this Plan does not seem to be a response to existing needs, but in anticipation of the increase in population brought about by the creation of about 2000 homes.

This presumably has also driven approval of out-of-town-centre Supermarket developments contrary to attempts by central government to strongly discourage this type of development.

An important, but unmentioned, issue is what factors are driving this population increase? The plan states a 20% increase; But increase in homes doesn't always mean increase in population - in many places the demand is not caused by, or results in, population increase, it's simply a matter of an increase in 'headship rates' as households tend to get smaller – at the present time that process has been slowed down by economic factors resulting in many young people and their growing families continuing to live with their parents longer.

If, in the case of Littlehampton, there will be a real increase in numbers, then why will people be moving here? It would appear that significant numbers of the occupants of the new housing developments in places such as Angmering travel to work in areas like mid-Sussex, Crawley, Gatwick, and live here in Arun because it's the nearest place with affordable homes.

Knowledge of these factors turns planning of facilities and infrastructure from guesswork onto some kind of factual basis. If the expected demographic is largely people who will be employed at a distance, this has consequences in both environmental considerations (in terms of increased travel) and employment requirement (less additional provision needed). But if the expected demographic is largely made up of older or retired people, then the focus moves towards Health Care. While thought has been given to increasing development land for employment (in quite specific ways that do not necessarily reflect the kind of work the majority of working residents support themselves by) the Proposed Health Centre re-location does not seem to result in enlarged capacity.

Although it is understood a Neighbourhood Plan should probably be somewhat broad-brush, it is hard to get a feeling of whether adequate provision is built-in when there is no statistical support or analysis.

In the past, Littlehampton grew because its families got larger; and because its fishing industry, commercial port and shipyards, railway, new industrial employers such as Duke and Ockenden, seaside landladies, the Beach Hotel, numerous Public Houses and seashore activities and entertainments drew in more people when the local families could not provide enough people to staff these activities. We need to know whether this current phase of growth is the town becoming more of a Dormitory or a Retirement Resort reliant on money from outside the area, or whether it is a new self-sustaining wealth-creating phase in the town's history.

Knowledge of the cause would make it easier to predict the consequential effects on all parts of the town – for instance hopes for a vibrant town centre may be more relevant to some demographics than it would be to others.

***How much consideration is being given to Flood and Groundwater issues in deciding Housing Land acceptability?***

The initial consultation process showed that the second highest Public Concern is flood risk and surface water issues.

Apart from a reference to the possibility of the Arundel Chord railway improvement having some negative effect, these concerns are not mentioned in the Plan, except indirectly when considering the West Bank, which seeks to protect a larger area of housing which is created in order to be protected.

***What is included in the named Green Spaces?***

The Plan identifies five green areas.

The choice is a little perplexing as it identifies some existing areas plus one that does not seem to exist; and fails to mention several existing ones and does not define new Green Spaces that are promised in the large new developments.

The first two Green Spaces, 'The Green' and Mewsbrook Park are shown on the Proposals Map as parts of a contiguous green-edged zone. The zone also encloses the Norfolk Gardens and the 9-hole Golf Course, the Sportsdome Surroundings and the Ruby Conservation Wood. It is not clear whether these un-named spaces are also explicitly protected as part of this policy.

***On what basis is the demand for new Hotel Bedspaces assessed?***

Concerns have been expressed that a excess of accommodation will arise, and the vacant rooms will be used as Homeless Accommodation, as is happening around the country. Concern has also been expressed about the impact on existing local providers.

***How does the LNP interface with the proposal for an Economic Improvement Area in the Local Plan?***

The problem here is more lack of clarity in the Local Plan than the Neighbourhood Plan, in particular what the references to education-related activities is.

***Is the Submission Draft Plan likely to be revised to include new proposals for Housing Allocation hitherto unseen and un-consulted?***

Neighbouring parishes have rejected proposals for Housing Development inside their boundaries, and there is a possibility the Allocation for Littlehampton will be revised upwards. What effect may this have on the Plan? Is there something fundamentally different between our Town Council and neighbouring Parish Councils?

### **3. Points that need to be clarified**

***What is the Strategic Green Link?***

There is no explanation obvious either in the Plan or the Glossary. The word 'Green' is used with many meanings – what does it involve here?

***What is the future of the existing Health Centre, and what is the scope, capacity and localities served by the proposed health facility close to the A259? And whether additional business premises will be approved to compensate?***

The purpose and detail of the proposed change of location for the Health Facility is not readily obvious in this draft of the Plan, a proper explanation is required.

If the Clinical Commissioning Group intends to relocate to a Business Unit on the former Costec/Morrisons Site, then the quantity of Business Premises will be reduced, decreasing the effectiveness of the Business Policy which takes account of existing provision.

***What is meant by 'adjoining land' and 'Policy 5' in connection with the former Hospital Site and Health Centre site in Church Street / Fitzalan Road? Should the Library be registered as an Asset of Community Value?***

The relationship with Policy 5 (West Bank in this Draft) is not clear. Nor is the area that adjoins the former Hospital site, which could mean the Health Centre, the Fire Station and the Public Library.

***Will Health and Medical capacity grow with the anticipated Population Growth or simply re-locate?***

Respondents to the preliminary consultation rated Health Services as their Highest Priority. The Plan seems to be simply reflecting the policy of the Clinical Commissioning Group, rather than expressing the needs of the Population. The community clearly wishes to see adequate and accessible facilities, the Plan should ensure the wants of the Community are met, rather than the operational convenience of the Commissioning Group if that results in less satisfactory provision.

***How is income calculated from the Community Infrastructure Levy?***

The February draft of the Neighbourhood Plan included a projection of the amount that would be generated by the Community Infrastructure Levy. The sum was very small indeed compared to the quantity of new housing proposed. It was not clear whether this discrepancy was due to a calculating error or because only a small proportion of the total raised finds its way to Littlehampton Town Council projects. Clarification is required, because if the sums involved are in fact so small, it may be necessary to reconsider some of the proposals. The figures do not appear in the pre-Submission Draft.

#### **4. Policies or topics that are not included which can / should be added without changing any specific policy already in the Plan**

***A Health Facilities Policy***

Health Facilities are the Community's Highest Priority. The Community feels it has been pushed around and deprived of important facilities, and would like to feel in control. The Plan is very unassertive on this most important concern, and does nothing active to influence the shape of future facilities. It does not even question whether the proposed re-location is best for the users.

***An expanded Housing Land Policy that allows for development of more creative ways of providing Affordable Homes and Homeless Accommodation, other than simply relying on Housing Associations***

When more than 15 new homes are built as a development, there is a general requirement to include a proportion of Affordable Housing, and this is usually achieved

by the intervention of a Housing Association (although this is frequently only achieved on larger schemes, the small and medium sized ones often discharge the requirement by paying a commuted charge due to reluctance of the Housing Associations to manage small projects). This only results in a specific type of Affordable Stock.

But there are other ways of enabling people who have few resources but plenty of energy and determination to house themselves, including Self-Build and Walter Segal Method co-operatives, both of which have been successfully realised in Brighton, for instance. No doubt collaborating with Housing Associations is an easier option for Local Authorities, but as an alternative there could be practical advantages in making agreements with the developers to make plots (with roads and other infrastructure) available for sale to self-builders and co-operatives.

Another issue is the matter of Homelessness among both individuals and families. A Neighbourhood Plan could review the possibilities of relaxing Use restriction on empty buildings that might be turned to providing Homeless Accommodation.

### ***A schedule of Assets of Community Value***

The previous draft listed the Assets of Community Value, the current draft has left them out.

As the Plan includes a schedule of Buildings of Special Character, then there is no reason why a schedule Assets should not be similarly appended so that they can be referred to as easily and stand as a record of the importance attached to them.

### ***A schedule of all open spaces and associated infrastructure of significance***

In order to balance the Plan and to influence future thinking and events, in the same way that the Plan has Policies relating to Listed Buildings and Buildings of Character (in which it probably simply follows the Local Plan format), there is a case for including and maintaining an inventory of all the facilities and assets which provide open space or premises for important or essential activities. The scope should be wide enough to include for simple non-organised activities, such as walking, non-structured exercise, and quiet places to sit in peace and enjoy the surroundings and distant views.

This should include all Green and Recreational Spaces, cultural facilities such as Community Centres such as at Wickbourne and Southfields, land and halls used for Youth, general Community, and Elderly activities. It should also include all the Designated Green Infrastructure areas in Appendix 1 of the 2012 GI Study.

### ***An evaluation of the Visual qualities of the parts of the Town and a statement of what is essential, what is desirable and what improvements would be encouraged***

Studies and inventories have been produced of the look of the town; some of this will have been as recent as the gathering of candidates for the list of Buildings of Character and Interest. It would be of benefit for the Town to take a cool look at the buildings, open spaces, streetscapes, and clutter in the town and to decide on and grade the importance of the various features and of the qualities and scale of the places and structures.

***Inclusion of surrounding green areas outside the built-up townscape with statements of their value***

There are many places in the town where their most important and valued qualities are heavily dependent on features outside the town and at a distance. There is always pressure to gobble up these outer areas, and identifying the vital views and spaces will help in evaluating the acceptability of future proposals and provide a basis for control.

**5. Additional policies or topics which would broaden the scope of the Plan to the Town's advantage**

***A fuller approach to Employment premises and Land, to include consideration of a wider range of trades and occupations***

The Plan seems to focus on B1 business uses which are generally low-disruption, but the majority of earned income in the town comes from sources outside of the limited activities covered in the 'Business Allocation' section. Residential Care is a very sizeable sector of the local economy (a fairly large Care Home has outline approval in North Littlehampton) , and Horticulture also is still significant. There is also demand for affordable small 'metal-bashing' and automotive engineering premises, which, unlike B1, need to be placed in locations where they will not conflict with other activities. It would be useful to be thinking about planning and providing for these additional areas of employment.

***A Holiday Trade policy to include Holiday Accommodation and various smaller-scale Facilities and Provision as well as the larger Leisure Industry***

The Holiday Trade including Accommodation for Visitors is so important it probably deserves a general Policy to itself, rather than isolated items relating to Harbour Park, the Windmill and the Leisure Centre.

The accommodation issue potentially has an effect on numerous small family businesses, who are vulnerable to competition from new economy Hotels. One 100-bed hotel has already been approved in North Littlehampton; another may be proposed for the West Bank near the Golf Course in full view of Pier Road. To add yet another on the Windmill Site could finish off any remaining signs of life in the small-scale holiday accommodation business – yet these small businesses tend to be more beneficial to the town's economy by keeping much more of the income in the locality.

We should think at least twice before giving up all our options to large business chains particularly ones that have any reputation for avoiding taxes.

Another Policy which would have a significant effect on the income from Tourism is the proposal to build housing at the north end of the Littlehampton Academy Field which includes removing the Touring Campsite. This is the last purpose-made site for tents in the town, the other one went when the Tesco store was built near the Arun Bridge. Significant income is brought into the town by tourists who camp or use touring caravans, the idea of a seaside town without a single space for camping is quite extraordinary. A high proportion of tourists looking for a tent-space are visiting from Europe. And it is important that any campsite should be inside the town boundaries,

otherwise the tourists will be tempted to spend their money in larger towns – Worthing, Bognor, Chichester, or in Arundel which is more tourist-orientated.

A suggestion was made at the Public Meeting that the touring caravan / camp park brings sufficient benefit to the town to make it worthy of consideration as an asset of Community Value.

## 6. Points that are not acceptable

### ***Explicit support for Hotel at Windmill Theatre site***

The Plan supports the District Council's Alternative proposal to Erect an Hotel in case 'the local planning authority supports a proposal to relocate'.

The Community seems to be comprehensively united in its opposition to this Alternative and does not wish to give open implicit approval.

### ***Explicit support for Housing at Swimming Sports Leisure Centre site***

The Plan supports proposals to relocate the facility to land north of the Littlehampton Academy and the change of use of the Sea Road site for housing development of up to 20 dwellings comprising only two storey houses.

The Community seems to be comprehensively united in its opposition to both these Alternatives and does not wish to give open implicit approval.

## 7. Policies that are so new and radical that a full public presentation and explanation and discussion is required before the Community can give support

### ***West Bank Policy***

This is a major revision to previous policies that raises some very fundamental issues - have they been adequately debated?

There is a strong suspicion that proposals here may conflict destructively with the earlier proposal for a Green Infrastructure Corridor (if that's what's meant by 'Strategic Green Link' – but it may not be), and although it includes a proposal for "a new country park facility comprising publically (*sic*) accessible informal recreation areas " and "provision of a protected Local Nature Area" this seems to be a reduced version of an earlier Consultant's Proposal.

A large area is defined, without differentiation or statements that certain parts of the area will be preserved, or assigned particular uses, although statements by Councillors have said this is the intention. As this is an exceptionally sensitive area and forms the western outlook from the town, and is part of the Climping Gap, and as there is a suggestion in the Education Policy that a 10 Ha school site will be required in this zone, then more specific proposals should be stated, if only as a statement identifying satisfactory locations for different forms of development and use.

Old Ferry Road heads off 1.5 km towards west, meaning a round-trip of 2 miles for all traffic to reach the east side of the bridge, or 3 miles into town centre.

Emergency access considerations, and general convenience too will result in pressure to construct a new access nearer the bridge, which would require major earthworks, an additional roundabout with associated street lighting, and further loss of farmland.

Among the top five 'concerns': *The impact of new development adjacent to flood plains and Flood management for East and West Bank of the River Arun*

The justification for developing the West Bank in this way is that it will make it eligible for Government Assistance to construct sea defences, unless it's certain that all the required defence work will be paid for by the developers. Unlike the east bank, if 200-year flood risk is taken into account, it will be necessary to protect all-round the area, rather than just the river frontage.

This is actually a response to a short-term policy rather than a Plan. Governments are fickle, and this policy will also change with time (as it has frequently this century). And can it be confirmed that adding new dwellings into an area where generally building would be discouraged will in fact guarantee Government Expenditure? Is it not equally likely that the Government would say it would prefer to save the money and uphold existing policies to ban new development on areas of high flood risk?

It also needs to be made clear whether the only reason for this proposal is to enable flood protection? It seems to be suggested that

1. The West Bank needs to be protected
2. It would be politically unworkable to suggest this should be paid for from locally-raised funds – the community will not accept the financial cost
3. Funds are only available if a threshold value of property needs to be protected
4. It is politically workable to permit development of the West Bank – the community will accept environmental and ambient cost

There should be a proper debate on these issues. It's doubtful whether there would be widespread community support for the changes being proposed, and very unlikely indeed that these policies would have arisen if the community had led this process. If this is the way the Town Council feels things must go, then they must carry the community along with them by force of persuasion and sound argument, having properly aired and considered all alternatives.

What the Plan doesn't state is what the highest preference would be – which is probably that the Climping Gap should be protected – which would of course also guarantee the future of the West Bank.

It would be interesting to compare the length of defence line that would need to be erected in each case.

## Aspects of the Plan which seem particularly commendable

- The Spatial Plan
- Community Right to Build Orders
- Business Incubator
- Local Centres
- Convenience Stores

## Why the Community Needs to Participate

On the subject of Local Planning, the Plain Guide to the Localism Act 2011 says... *Instead of local people being told what to do, the Government thinks that local communities should have genuine opportunities to influence the future of the places where they live. The Act introduces a new right for communities to draw up a neighbourhood plan.*

*Neighbourhood planning will allow communities, both residents, employees and business, to come together through a local parish council or neighbourhood forum and say where they think new houses, businesses and shops should go – and what they should look like.*

The Littlehampton Neighbourhood Plan has been prepared on the initiative of Littlehampton Town Council as elected representatives of the community and a neighbourhood level, acting as a *local parish council* (see above). In this project the Council has been assisted by Officers of the Town Council and the District Council.

A consultation process was undertaken, but still using the kind of tools that are familiar from past consultations throughout the country that tend to shape the outcome. The first draft of the Plan was then published with no secondary discussion document or further consultation about the data gathered beforehand.

The document is large and complicated. It's a mix of statements of the state of the town, the future of the town, the local plan and local policies. It takes some understanding.

Some things, like the growth of the town, are stated uncritically as inescapable facts, rather than as predictions that the Plan might be structured to resist or encourage. Policies tend to go into the details required as a result of these facts, rather than stating an attitude ('vision' is the favourite word) towards the facts.

Generally this approach arises from the Council's ongoing engagement with these issues and the resulting established views, and it must be said the Community at large has tended to leave such things to its Council. But historically the larger community's preferred options haven't always shaped the inevitable compromises that develop over many years of living through changes. This Plan should be an opportunity to draw a line, and if not to make a fresh start, at least to review the compromises we have made, to be sure we have actually explored the options.

And some policies are the Town Council's response to quite new pressures, such as West Bank development in forms that are different from ones proposed in earlier Specialist Consultations that were commissioned – and so have not really had time to be reviewed by the Community.

It must be remembered that the 'old', pre-Localism, way of doing things has been to employ consultants who tend to propose policies on the basis of 'experience' rather than on high-grade analysis of the special local factors that apply. If you accept all existing policies as being perfectly formed, then you continue to keep the bad genes in the Town's DNA.

It is very clear that those parts of the Community that know about the existence of the Plan are very keen to see the new intentions of the Localism Act used to shape the Neighbourhood in ways they wish to see. But many are sceptical about the likelihood of this happening as the process appears to belong to the Town Council assisted by the District Council. The Community does appreciate how Town Councillors came together with the Community over the District Leisure Strategy; and the Community would like this spirit to continue.

The problem is, the second draft of the Neighbourhood Plan seems to be less close to the wishes of the Community that was the first draft. And in addition, there are a number of very significant matters concerning the future of the Town that really haven't been explained or promoted. It has been suggested by way of explanation that some of these policies are included as the Town Councils way of protecting aspects of the Town that the Community Values – the method seeming to be to agree that the unwanted events will happen in the future, but encumber them with the Town's requirements that may be so restrictive that the events may never happen. We have to trust their judgement on these matters without explanation.

The Town Council is promoting this process by saying the Neighbourhood Plan 'belongs' to the Community; it is the Community View, and the Town Council is merely facilitating and guiding the Community through the process. But a great deal that is in the Plan seems to have originated with the Council and its Advisors, and little has been added since the first draft, and the changes that have been made seem to owe more to concerns of the Council than to representations by the Community.

There has been no positive response to the request of the Public Meeting for the Council to extend the period for consultation. **This means that we must act with speed and determination to make sure our views are expressed.** Then at the following stage we can decide whether the views were incorporated, and whether the Town Council and their Advisors do respect the spirit of the Localism Act.

## Final Decision – is the Plan really the Community's View?

By the time the Submission Draft of the Plan is published it will have gone through three stages of consultation. Assuming the consultation was adequate and representative, and that the drafts were revised in response to representation received, the final version should be a true reflection of the Community view.

At the present, pre-Submission, stage the Plan should have taken account of the views gathered in the initial Consultation Stage and also the response to the first draft. We can see summaries of the Likes, Wants, Concerns and Priorities that were expressed in the initial consultations, but no summaries of representations submitted about the first draft have been published.

It should be possible to tell what representation were made on the first draft by comparing the first draft with this second, pre-Submission, draft. As noted above, Highest Priority

Concerns gathered in the consultation stage seem to have had very little impact on the form of the first draft, and it's difficult to square the revisions made to the second draft to the kind of issues that the Community seemed to be concerned with at the time of the second public consultation.

When the consultation ends on 17<sup>th</sup> July, unless the consultation period is extended there will be no further consultation on the Plan, and opportunity to comment (other than among ourselves) on the Submission Draft of the Plan.

If the Plan then goes to Public Referendum the only way to express whether this is the community's plan, and whether the community gives it support will be by voting.

## **The Sections and Policies of the pre-Submission Draft**

### **TOPICS IN THIS SECTION:**

**Purpose**  
**Comments and Representations**  
**Logging of and Evaluation of Representations**

### **The PLAN:**

- 1. Introduction**
- 2. State of the Town**
- 3. Visions and Objectives**

### **Policies:**

#### **Changes from Previous Version**

- 1 The Presumption in Favour of Sustainable Development**
- 2 A Spatial Plan for the Town**
- 3 Housing Supply**
- 4 Housing Site Allocations**
- 5 West Bank**
- 6 Reserved Housing Sites**
- 7 Business Land Allocations**
- 8 Business Incubator**
- 9 Local Centres**
- 10 Convenience Stores**
- 11 Littlehampton Leisure Centre**
- 12 The Windmill Theatre**
- 13 Littlehampton Community Centre**
- 14 Keystone Centre**
- 15 Education Provision**
- 16 Local Green Spaces**
- 17 Buildings and Structures of Special Character**
- 18 Fitzalan Link Road**
- 19 Lyminster Bypass & A27 Bypass**
- 20 Arundel Chord Railway Improvement**
- 21 Arun Canal**
- 22 Design of New Housing Development**
- 23 Community Right to Build Orders**
- 24 Infrastructure Investment Priorities**

#### ***The Strategic Environmental Assessment***

## **Purpose of the Commentary**

Over the past ten months an unprecedentedly large number of the Arun Community came together to try to influence future Leisure Policy in the district, and in this they were united with Littlehampton Town Council in determination to protect our special Assets in the Town.

This over-lapped with the introduction of drafts for the Littlehampton Neighbourhood Plan, and many of those involved in the Leisure Strategy campaign also made it clear that they felt the Neighbourhood Plan should state the shared view of the Town and Community, and not incorporate implicit approval of the options which were particularly unwanted.

The Community consensus seems to be that the second, pre-Submission, Draft of the Neighbourhood Plan takes less account of Community views than the previous draft, even though it is promoted as the Community's Plan, not the Town Council's.

The pre-Submission draft is in the public consultation stage, and it is essential that comments and representations are fed in before the deadline. Although the Community has no particular cause for optimism based on past performance, nevertheless if good fair arguments and views are submitted then the Community has a benchmark to use when deciding whether the Submission Draft does truly represent the Community Consensus, and vote accordingly in the Local Referendum. Furthermore it's to be hoped that this will bring in broader and more representative views than the ones gathered to date, and reinforce the widespread support for some of the views that have been 'balanced' out of the Plan.

The Community has been almost entirely focussed on Leisure issues, although a number of local amenity groups did have input in the early consultation stages, where larger issues were considered. This is an attempt to point out some of the other issues which the Community should be engaging with in considering the Neighbourhood Plan.

This not a fully-worked out and compiled Community view, its purpose is to flag a number of unanswered questions and points of disagreement that tend to lessen Community Support for the Plan as it stands. In some ways it's a compilation of points that have been expressed almost as an aside in meetings and discussions about the Leisure Strategy, and it's more than likely that some crucial issues have been missed – if so, please use the websites and social media that have been set-up for the purpose to tell everyone about them, or write to the Secretary of the Littlehampton Civic Society, so they can be shared, aired, and discussed.

There will be certainly factual errors and omissions and misinterpretations of intentions, but then the Plan itself as a few of these.

## **Comments and Representations**

*Who is eligible?*

The Plain Guide to the Localism Act Says...

'communities, both residents, employees and business'

So this appears not to restrict comment to residents of the Plan Area, but can include employees and employers operating in the Area.

## Logging of and Evaluation of Representations.

All to be logged and have a summary record / index card

All submissions to be readily available for reference in entirety, not just as summaries

If deemed ineligible, reason must be given

Each point to be considered as follows:

- Relate to the Policy or Policies it concerns
- Summarise the substance of the issue
- Evaluation, and when / by whom evaluated
- Whether the draft was revised to take account
- If draft was revised, what change was made
- If draft was not revised, why the point was disregarded

Before finalising the next draft, a methodical re-assessment of the issues is to be carried out to make sure a balanced response has been made to all – it is unsound to rely on snap judgements and memory.

There is also a noticeable amount of dissatisfaction among individuals and groups who did make representations that the pre-submission draft either ignores or has been revised contrary to their representations, and would like to see, possibly under Freedom of Information, but preferably freely and willingly, the text of the representations that were made at the previous two consultation stages.

### 1. Introduction

1.2 Neighbourhood Development Plans – page 6

*‘Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need.’*

Let us note that ‘shared vision’ assertion. And let us not forget we have the right to have a ‘vision’ when it comes to dealing with the nuts and bolts of ‘Allocations’ – let’s remember to think in terms of quality and not just quantity.

1.4 Consultation – page 7

*The Town Council has consulted the local community extensively over the last eighteen months. **Groups of local residents have been established** to review and agree which issues should be addressed by the plan.*

Referring to Appendix 7, it is not possible to deduce what groups were ‘established’, but it does show that very little group consultation was undertaken after the first draft was published, as part of the consultation for this pre-Submission Draft.

### 2. State of the Town

2.3 Community Views

A reasonable test for the Plan is how successfully and fully it has embodied and satisfied the views gathered in the Consultation Stage. We can all judge this for ourselves, by

Commentary on the pre-Submission Draft of the Littlehampton Local Neighbourhood Plan comparing the Likes, Wants, Concerns and Priorities listed in this section against the actual policies.

Among the Priorities: 2. Employment - seen as a high priority by all age groups even though a significant number of respondents were over retirement age.

Two comments here – first, the response by those over retirement is probably indicative of the widespread need to continue working because of longer lifespans and plummeting pensions.

And secondly surprise that there seems to be no integrated component of the Plan that deals with Employment. The majority of earned income in the town comes from sources outside of the limited activities covered in the 'Business Allocation' section. Care is a very sizeable sector of the local economy, and Horticulture also is still significant.

It can also be argued that the Holiday Trade including Accommodation for Visitors is so important it deserves a general Policy to itself, rather than isolated items relating to Harbour Park, the Windmill and the Leisure Centre.

Another Policy which would have a significant effect on the income from Tourism is the proposal to build housing at the north end of the Littlehampton Academy Field which includes removing the Touring Campsite. This is the last one in the town, the other one went when the Tesco store was built near the Arun Bridge. Significant income is brought into the town by tourists who camp or use touring caravans, the idea of a seaside town without a single space for camping is quite extraordinary.

The Link between Tourism and Leisure:

The existence of attractive leisure facilities brings tourists into the town, and the leisure facilities are also valuable to the locals – as shown by recent events.

If this is a 'Plan', then it should be planning for the future which promises a planned 20% population increase.

In the top ten 'wants' revealed by preliminary consultation: *Cinema, bowling alley, skating rink – improved leisure facilities*

Let's not be too pessimistic about future demand for leisure facilities such as cinema, the increasing population may provide the needed additional support.

### **The New Neighbourhood Plan must not conflict with the Strategic Aims of the Local Plan**

The (Local) Plan sets out a series of strategic objectives

*To strengthen Arun's economic base and provide local job opportunities by increasing, diversifying and improving the quality of employment within the district through the provision of appropriate employment sites, better infrastructure including road access,*

*quality affordable accommodation and the development of business support and partnerships;*

*To reduce the need to travel and promote sustainable forms of transport;*

Some parts of the Plan may be counter to this strategy

*To plan for climate change; to work in harmony with the environment to conserve natural resources and increase biodiversity;*

Some parts of the Plan may be counter to this strategy inasmuch as is likely to be a net loss in spite of the intention to establish conservation schemes

*To plan and deliver a range of housing mix and types in locations with good access to employment, services and facilities to meet the district's housing requirements and the needs of Arun's residents and communities both urban and rural, ensuring that issues of affordability and the provision of appropriate levels of affordable housing are addressed while supporting the creation of integrated communities;*

*To protect and enhance Arun's outstanding landscape, countryside, coastline, historic, built and archaeological environment thereby reinforcing local character and identity;*  
Some parts of the Plan may be counter to this strategy

*To create vibrant, attractive, safe and accessible towns and villages that build upon their unique characters to provide a wide range of uses and which are a focus for quality shopping, entertainment, leisure, tourism and cultural activities;*

Residents of some villages and some parts off Littlehampton may have been hoping for peace and serenity rather than vibrancy.

Plan B, as included in the document, is unreadable in some important respects.

A large part of Littlehampton on the east bank of the river appears to be allocated as an Economic Improvement Area – and is also the area that will be hard hit by competition from the various new hotels proposed in the Neighbourhood Plan Draft or already approved.

*Policy SP22 promotes a new strategic green link between Littlehampton and Arundel (Policy SP22) to improve access between the two towns, the coast and national park*

**What is a Strategic Green Link?** What precisely is meant by *Green* in this context? It does not sound like the 'Green Corridor' in Glossary as it seems to be directing movement through instead of protecting and excluding.

### **3. Visions and Objectives**

Neighbourhood Plan Vision is stated as:

*'To fundamentally improve the economic, environmental, and social well being of individuals and communities in the town, particularly those in the most deprived areas. To enhance, improve and protect existing community infrastructure and propose new where appropriate, that will deliver excellent local and accessible facilities to all of the Littlehampton population'*

It is a shame that the vision seems to be almost totally non-visual, especially as the positive visual qualities are so valued and the negative ones so deplored by residents and visitors alike.

This applies to both townscape and surrounding fringes, some of which are definitely threatened by proposals in this Plan, in spite of the Strategic Environmental Assessment test results.

In the Draft Strategic Environmental Assessment section the Plan says..

*The designated environmental features of the town are identified in the Neighbourhood Plan and in section 4 of the SEA*

Unfortunately there does not seem to be a Section 4, nor an un-numbered part of the previous section which identifies features.

## Policies

### Changes from Previous Version

Policy Changes / re-numbering...

Feb 2013:	June 2013:
14 Littlehampton Health Facility	14 Keystone Centre
15 Secondary School Provision	15 Education Provision
16 Assets of Community Value	16 Local Green Spaces
17 'The Green', Harbour Park, Norfolk Gardens & Mewsbrook Park	17 Buildings and Structures of Special Character
18 Buildings of Special Character	

### Comments on the Changes:

Feb 2013: 14 Littlehampton Health Facility

*The Neighbourhood Plan allocates land at NW Academy, as shown on the Proposals Map, to provide a new health facility comprising a variety of primary care services including relocation of existing services and also some of the services that have previously been identified through the community hospital proposal.*

It is understood the Clinical Commissioning Group intends to relocate this proposal to a Business Unit on the former Costec / Morrisons Site. However what is not clear is whether this new facility will also absorb all the functions of the existing Health Centre between Church Street and Maltravers Road, and if that is the intention, whether this move will result in more capacity for health services.

### Feb 2013: 16 Assets of Community Value

It has been suggested that now the four Assets have been registered, there is no further need to name them.

However, if it is considered worth referring to Buildings of Special Character, which are also registered and listed, then there is no reason why the Assets should not be too – after

all, the purpose is to draw people's attention in future to the existence of the will, and legal basis, to retain these assets.

## **Glossary Entry - Assets of Community Value**

The latest version of the Glossary refers to Appendix 8 being a list of Assets – but it is the Littlehampton Neighbourhood Plan Site Assessment Report

### **1 The Presumption in Favour of Sustainable Development**

Of course this is a principle everyone supports, but Presumptions in Favour of Sustainability are ten a penny. Every Local Plan has one.

The important issue is not intention but comprehension and deliverability.

For the last ten years or so Planning Authorities have had to be satisfied that proposals for new housing are 'sustainable'; much of this being a matter of complying with national standards for energy and material resources use, but the other major factor is close access to shops, particularly food shops, and access to good efficient public transport. Arising out of the Kyoto agreements, the intention is to reduce the amount use personal vehicles.

Another factor that is rarely taken into consideration is the availability of employment close by. Most people would prefer to have to travel less.

What the Community hopes for is 'joined-up' thinking. What we have seen at a District level is not increased availability of food stores close by, but an increase in out-of-town stores, some of which draw a significant amount of trade from adjoining areas, involving five miles or more round-trips, which is hardly in the spirit of Kyoto. Some of these stores may be close to future development sites, anticipating the 20% population increase, and this may be the factor which facilitated approval. A future unexpected consequence of the expected increase in population may be that the amount of travel to work will increase significantly.

### **2 A Spatial Plan for the Town**

The Plan Diagram seems to successfully combine the way the town is (the reality arising out of the history of the settlement) with the revival of transport route ideas (that originated over sixty years ago but were discarded about twenty years ago) with newer road and zoning ideas that have emerged more recently.

It has the potential to work both as organisation and experience. It is clearly and immediately intelligible to townspeople and visitors alike.

It has many features that clearly accord with Community Preferences. Differences arise where the clearly stated structure of the Spatial Diagram is compromised when the Neighbourhood Plan tries to accommodate potentially conflicting courses of action by the District Council in its roles as landowner of Leisure Facilities.

### **3 Housing Supply**

#### ***Growth of Town - What is the cause, and What is Effect?***

In drawing up the Plan, with advice from the District Council, the Town Council Planning and Transport Group will have had a ready-formed agenda for including the large tranches of housing we see included in the Neighbourhood Plan.

The draft Plan says *“there (was) the possibility of choosing options proposing a significantly lower or higher housing supply target. These options were not assessed, as neither was considered plausible...”*.

On the other hand, much of the Community will not feel comfortable with this kind of intensification, or have much enthusiasm to support such large developments because it is likely to have a degrading effect on those qualities (trumpeted in both Local and Neighbourhood Plans) that brought them, or made them enjoy living, here in the first place. A large proportion of the infrastructure, educational, employment and open space provision identified in this Plan does not seem to be a response to existing needs, but in anticipation of the increase in population brought about by the creation of about 2000 homes.

### **4 Housing Site Allocations**

#### **Flood and Groundwater Concerns**

The initial consultation process showed that the second highest Public Concern is...

*Flood risk and surface water particularly relating to:*

- a. The impact of over-development and demands on existing drainage and water supplies*
- b. The impact of new development adjacent to flood plains*
- c. Flood management for East and West Bank of the River Arun*

Apart from a reference to the possibility of the Arundel Chord railway improvement having some negative effect, these concerns are not addressed in the Plan

#### **Affordable Housing**

There is a general requirement to include a proportion of Affordable Housing when more than 15 new homes are built as a development, and this is usually achieved by the intervention of a Housing Association (although this is frequently only achieved on larger schemes, the small and medium sized ones often discharge the requirement by paying a commuted charge due to reluctance of the Housing Associations to manage small projects). This only results in a specific type of Affordable Stock. But there are other ways of enabling people with fewer resources to house themselves, including Self-Build and Walter Segal Method co-operatives, both of which have been successfully realised in Brighton, for instance. No doubt collaborating with Housing Associations is an easier option for Local Authorities, but as an alternative there could be practical advantages in making agreements with the developers to make plots (with roads and other infrastructure) available for sale to self-builders and co-operatives.

## **Comments on particular Sites:**

North of the Littlehampton Academy:

The Proposals Map shows an area of Housing at the North end of the School Field that extends eastwards from the Fitzalan Road extension and covers the existing caravan / camping park, with a Green Open Space to the east of that.

This proposal raises two concerns:

Firstly that the caravan park is on a Landfill site which is subject to ongoing settlement and may be contaminated; and secondly this will result in the loss of the only remaining touring campsite in the town. The site operator claims that when fully operational the park can bring over a million pounds a year into the town's economy, much of which come from visitors from Europe.

St Martins: It is not clear how demand for retail use arises when the High Street struggles to sustain existing shops, and supermarkets face competition from large out-of-town stores.

Existing traders will have an opinion on the car-parking issues and the effect on their trade.

## **5 West Bank**

The policy defers to the Local Plan Policies:

*Policy SP11 proposes that the LNP provides for 200 new homes in Littlehampton in the plan period and identifies land at West Bank for a strategic development of approximately 1,000 new homes*

*Policy DM4 on Littlehampton Harbour encourages development proposals that safeguard the harbour and address flood risk, contamination, access and nature conservation issues in parallel with the housing allocation in Policy SP11*

This raises some very fundamental issues - have they been adequately debated? It is very doubtful whether the Community has had the time or information to enable it to develop an attitude that corresponds to the policies stated here.

## **6 Reserved Housing Sites**

Allows for adjustment of uses as the area changes, and includes some safeguards for community facilities. This is a sensible provident policy attempt to reserve some control.

## **7 Business Land Allocations**

If the Clinical Commissioning Group intends to relocate to a Business Unit on the former Costec / Morrisons Site, then the quantity of Business Premises will be reduced correspondingly.

The location of the proposed Business Land conforms to established zoning and conforms with the Spatial Plan.

The Policy restricts use of the proposed new Business Units to B1, but there is a case for Allocating and Implementing small B2 premises, because this is the type of use that enables younger people, in particular the more creative less academic ones, to develop employment opportunities. Delivery of these business and industrial facilities should be a priority because Developers are rarely prepared to provide small units.

## **8 Business Incubator**

The location of the proposal near the centre of town lends itself to B1 uses, and is particularly accessible.

## **9 Local Centres and 10 Convenience Stores**

The Community is bound to applaud and support these proposals as a principle, however this must be matched by support for the neighbourhood traders who face strong competition from the out-of-town supermarkets.

## **11 Littlehampton Leisure Centre**

The Community and Town Council are agreed that the entire centre function should continue on its present site and agree that *the site is of sufficient size to enable a larger facility with ancillary car parking and better landscaping on its Sea Road frontage*

### **Serious Points of Community Concern:**

This policy continues to explicitly support the District Council's Alternative in case 'the local planning authority supports a proposal to relocate', in this case *to relocate the facility to land north of the Littlehampton Academy and the change of use of the Sea Road site for housing development of up to 20 dwellings comprising only two storey houses.*

The Community seems to be united in its opposition to both these Alternatives and does not wish to give open implicit approval.

## **12 The Windmill Theatre**

The Policy Map seems to include the whole of Harbour Park and part of the Oyster Pond – what can be the explanation?

The Community and Town Council are agreed that Theatre and Cinema should continue together on this site.

### **Serious Points of Community Concern:**

- This policy continues to explicitly support the District Council's Alternative in case 'the local planning authority supports a proposal to relocate', in this case stated as a

- D1 Hotel – but Use group D1 is ‘Non-residential institutions’, so presumably an error.
- The Windmill is not identified as an Asset of Community Value
- The undertaking not to demolish until suitable and at least equivalent facilities are ready and available for occupation (*‘consented and implemented’*) by Theatre and Cinema users is no longer part of the Policy

### **13 Littlehampton Community Centre**

This is a modern and purpose-built replacement for the Dairy Centre, which has proved a indispensable if not always ideal asset.

A clearer explanation of the scheme and its location would have been useful. Evidently the intention is to demolish the concrete-framed former office extension to the Manor House.

### **14 Keystone Centre**

No information has been found about the history and details, or even the use of this proposal, although probably well known in the immediate locality – information required please!

### **15 Education Provision**

Considerations of the Demographic of the occupants of the new homes referred to in this policy need to be properly factored-in. 10 Ha is a very substantial increase to the developed land on West Bank.

Of course there will be a vacant School Site available in Elm Grove Road in the required timescale.

### **16 Local Green Spaces**

The policy in the June LNP draft has been revised. As mentioned above in ‘Errors and Omissions’ in the February draft this was Policy 17.

This policy nominates five green areas.

- a) ‘The Green’
- b) Mewsbrook Park
- c) Caffyns Field
- d) Brook Field Park
- c) Land North East of the Academy (‘Oakcroft Green’)

The choice is a little perplexing as it identifies some existing areas plus one that does not seem to exist; and fails to mention several existing ones and does not define new Green Spaces that are promised in the large new developments.

The first two Green Spaces, 'The Green' and Mewsbrook Park are shown on the Proposals Map as parts of a contiguous green-edged zone. The zone also encloses the Norfolk Gardens and the 9-hole Golf Course. It is not clear whether these two areas unnamed spaces are also explicitly protected as part of this policy.

In view of the continued inclusion of a proposal for new Housing on the Leisure / Swimming / Sports Centre campus, is future of the Ruby Conservation Wood secure?

The fifth Green Space is part of Housing Site ii of Policy 4, and probably arises out of the loss of the land reserved for the Fitzalan Road Extension which tended to be used as an unofficial Public Space. While recognising the need for an accessible public open space, the issue of the resulting loss of the only touring camping site in the Plan Area was brought to the attention of the recent Public Meeting, and is also referred to under Housing Site Allocation Policy 4 above.

Some would also consider the peripheral green spaces on the town edges to be equally important, and strong candidates for identifying and including in the Plan.

In order to balance the Plan and to influence future thinking and events, in the same way that the Plan has Policies relating to Listed Buildings and Buildings of Character (in which it probably simply follows the Local Plan format), there is case for including and maintaining an inventory all the facilities and assets which provide open space or premises for important or essential activities. The scope should be wide enough to include for simple non-organised activities, such as walking, non-structured exercise, and quiet places to sit in peace and enjoy the surroundings and distant views.

This should include all Green and Recreational Spaces, cultural facilities such as Community Centres such as at Wickbourne and Southfields, land and halls used for Youth, general Community, and Elderly activities. It should also identify external views and open spaces.

## **17 Buildings and Structures of Special Character**

This effectively appears to repeat Policies in the Local Plan without significant difference

## **18 Fitzalan Link Road**

The detail outcome of the proposal is probably better on balance that would have been the result of the original scheme, with its overpass and interchange – but then if that had been less ambitious it probably would have been implemented.

## **19 Lyminster Bypass & A27 Bypass**

The regrettable loss of open farmland has to be balanced against the severe problems to both residents and travellers.

## **20 Arundel Chord Railway Improvement**

(except it seems to be an arc rather than a chord!)

About a century and a half over-due. This seems to be the only place where taking account of flooding is specifically mentioned, where presumably blockage of existing water courses is the concern rather than tidal inundation as in the housing land locations –where no specific mention is made.

## **21 Arun Canal**

This may be a slow-burn policy.

There is probably near-universal support for completion of this long-term project, although there is always the possibility of local problems being encountered in view of the great changes since the navigation was abandoned.

## **22 Design of New Housing Development**

Reflects local concerns.

## **23 Community Right to Build Orders**

As with Assets of Community Value, there is agreement between Town Council and Community on these deemed Planning Approvals

## **24 Infrastructure Investment Priorities**

The February draft of the Neighbourhood Plan include a projection of the amount that would be generated by the Community Infrastructure Levy. The sum was very small indeed compared to the quantity of new housing proposed. It was not clear whether this discrepancy was due a calculating error or because only a small proportion of the total raised finds it way to Littlehampton Town Council projects. Clarification is required, because if the sums involved are in fact so small, it may be necessary to reconsider some of the proposals. The figures do not appear in the pre-Submission Draft.

## **Strategic Environmental Assessment**

The purpose of the SEA is to satisfy EU requirements by evaluating factors.  
*“The assessment indicates there are no significant environmental effects of the Plan. Those minor environmental effects of the Neighbourhood Plan will be addressed as identified...”*

However, the factors considered and the method of evaluation employed are not necessarily those that the Community would instinctively prefer.