

Submission of Recommendations on the Littlehampton Neighbourhood Plan by the Charter Working Group, (Sponsored by the Civic Society), 2nd August 2013

This submission arises out of points identified and discussed in Commentary already submitted for information at the 10th July drop-in event.

Additional Policies

- A: A Holiday Trade Policy to include Holiday Accommodation and various smaller-scale Facilities and Provision as well as the larger Leisure Industry, recognising the continuing importance of this core area.
- B: An evaluation of the Visual qualities of the parts of the Town to include both the qualities of the townscape and of views and outlooks from specific locations, and a statement of what is essential, what is desirable and what improvements would be encouraged. The evaluation should include surrounding green areas outside the built-up townscape with statements of their value. The Value Statements are to inform decisions on proposals which would have an effect on anything identified in this study, and a suitable Policy clause (possibly as part of the Design Review Panel procedure) requiring new development of buildings and infrastructure to take full account of the values ascribed and to do nothing to diminish them, and where appropriate, to enhance them. (The document can be in the form of an appendix which can be expanded by due process).
- C: A schedule of all open spaces and associated infrastructure of significance, not simply a few selected Green Spaces, with a statement expressing their importance and the Town's determination to add to and enlarge the provision as the population grows. (The schedule listing can be in the form of an appendix which can be expanded by due process). It is appreciated that some of these spaces will not satisfy the requirements of NPPF para 77, but nevertheless several that are not listed appear to meet the requirements, and all have vital community value and should not be degraded as the result of development unless a generally acceptable improvement results.
- D: A schedule of Assets of Community Value as a formal statement expressing and recognising their importance to the Community (The schedule listing can be in the form of an appendix which can be expanded by due process).
- E: A Health Facilities Policy that expresses what the community judges is needed and reasonably aspires to, rather than what is on offer.

Expanded Policies

4.3 Housing Policies

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. If this is truly beyond the expertise of the

Neighbourhood Plan then at least a statement of presumption in favour of providing opportunities for these more direct approaches instead of the more common commuted approach.

Policy 5: West Bank

A far more assertive West Bank Policy that actually reflects and expresses the view of the townspeople and community, and seeks to preserve what we consider of great value, and limits adverse effects. To include an embargo on new housing or hotel development further south than the end of the Rope Walk wharves (meaning a line extending from the river westwards towards Climping) with the Neighbourhood Plan Key Diagram revised to take account of this geographic limitation, and a requirement to provide for a substantial Publicly Accessible wetland / wild area. To take account of flooding and groundwater risks and to limit obstruction of views by setting a strict limit on overall heights of buildings.

Policy 7: Business Land Allocation

A fuller approach to Employment premises and Land, to include consideration of a wider range of trades and occupations. The town is in need of places and facilities for carrying out trades and occupations of all kinds, not just residential-area-friendly B1 uses. If part of the new Health Facility in north Littlehampton is to be built on land allocated for business or industrial use, then an equivalent additional amount of industrial land should be provided in the Plan.

Policies that should be amended

Policy 11: Littlehampton Leisure Centre

- by deletion of explicit support for Housing at the Swimming and Sports Leisure Centre site
- by removal of reference to relocation to north of the Academy, as - if this relocation is unavoidable - this not the only site option, and the point about access from Fitzalan Road is a rather fine detail for a Neighbourhood Plan.

Instead, the Policy should say that if it becomes impossible to resist relocation of the leisure centre then it should be relocated to a position conveniently accessible to the most users, where it does not have an adverse effect on residents nearby, that the facility shall operate separately from the Littlehampton Academy or other similar establishments, and the replacement leisure facility is to be consented and implemented before use of the existing Swimming and Sports Leisure Centre is discontinued. Additionally the Arun Aqua Centre must be properly protected and supported so it can continue with access to the seafront.

Policy 12: The Windmill Theatre

- by deletion of explicit support for Hotel at Windmill Theatre site.
- By rewording the present policy to make it definite that permission to redevelop the Windmill site is conditional on provision of an equivalent cultural facility to be consented and implemented before development commences.

Aspects of the Plan which seem particularly commendable

Policy 2: The Spatial Plan

Policy 6: Other 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.

Policy 8: Business Incubator

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

Policy 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.

Policy 18: Fitzalan Link Road

The detailed outcome of the proposal is probably better on balance than 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.

Policy 19: Lyminster Bypass & A27 Bypass

The regrettable loss of open farmland has to be balanced against the severe problems to both residents of Lyminster and travellers on the existing dangerous road.

Policy 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.

Policy 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.

Policy 22: Design of New Housing Development - Reflects local concerns.

Policy 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.

Commentary in Support of the Representation

This commentary follows the content of the Littlehampton Neighbourhood Plan and where possible page numbers have been given corresponding to the Plan.

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1. Introduction

1.4 Consultation (p7)

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.

We would like to see...

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.

2. State of the Town

2.3 Community Views (pp10-12)

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 comparing the Likes, Wants, Concerns and Priorities listed in this section against the actual policies.

The Commentary, and the Representation might, time and resources permitting, have gone deeper into the 'To Five Areas of Concern' (p11).

It would be wise for the drafters of the NP to go through the list and see how well they have been accommodated, because it's unlikely that all the ones that have been more or less passed over are not capable of being addressed without being in conflict with some Strategic Policy or other. It has already been established early in the Consultation that these are things the Community would want to see in the Plan.

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

The response by those over retirement is probably indicative of the widespread need to continue working because of longer lifespans and plummeting pensions, and also concern about the prospects of their children and in many cases of their grandchildren too.

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.

(See Expanded Policy 7, p2)

It can also be argued that **Tourism** - 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.

(See Additional Policies A, p1)

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*

In the face of this response the neighbourhood Plan will not be representing the Community View if appears to concede to moves to worsen provision of these resources.

2.5 Submission Arun Local Plan (p13)

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. The proposals for housing appear to go well beyond the neighbourhood's housing requirements.

Plan B, as included in the document, is unreadable in some important respects. (p15)

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.

3. Visions and Objectives (p17) (See Additional Policies B, p1)

Neighbourhood Plan Vision is stated as:

'To fundamentally improve the economic, environmental, and social wellbeing 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.

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.

As with the other schedules referred to above, this could be a Live Appendix that evolves and responds, subject to a defined review procedure.

4. Policies and Proposals

4.2 General Policies

Policy 1: The Presumption in Favour of Sustainable Development (p19)

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 of personal fuel-powered 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.

Policy 2: A Spatial Plan for the Town (p20)

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.

4.3 Housing Policies

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...*". (6. Strategic Environmental Assessment (SEA), 11.p57)

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 that it would be to others.

Policy 3: Housing Supply

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

As discussed in 4.3 (page 8, above) decisions about Housing Supply should be informed by knowledge of the causes and details of the needs or directives that are driving demand. Organic growth would be preferred but that doesn't seem to be an option. Use of brownfield land would be preferred, but that sustainable objective seems to have been largely forgotten. Regard for natural forces, such as flooding and groundwater would be preferred, but seems to be subordinated to the unchallenged need to grow.

Policy 4: Housing Site Allocations (pp 23-24)

Affordable Housing

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 (See Expanded Housing Policies 4.3, p1)

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.

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.

North of the Littlehampton (p24)

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. Were these factors taken into account, and should the Neighbourhood Plan support proposals that involve these issues?

St Martins (pp24-25)

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.

Policy 5: West Bank (pp25-28) – (See Expanded Policy, p2)

The policy defers to the Local Plan Policies:(p16)

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.

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 Policy 15: School Provision (p33) 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' (p11): *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 Balk 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.

4.4 Enterprise Policies

Policy 7: Business Land Allocations (p28) – (See Additional Policy, p2)

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.

4.5 Community Infrastructure Policies

(See Policies that should be amended, p2)

Policy 11: Littlehampton Leisure Centre (pp31-32)

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.
Both Alternatives are also in conflict with the Spatial Plan proposals.

Policy 12: The Windmill Theatre (pp32-33)

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

Policy 13: Littlehampton Community Centre (p33)

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.

Policy 15: School Provision (p33)

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.

4.6 Environmental Policies (See Additional Policies C, p1)

Policy 16: Local Green Spaces (pp34-35)

What is included in the named Green Spaces?

The Plan identifies five green areas:

- a) 'The Green'; b) Mewsbrook Park; c) Caffyns Field; d) Brook Field Park
- e) 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, 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.

To most people, 'The Green' is the area between the promenade and South Terrace, and doesn't include the Norfolk (Pleasure) Gardens. There is concern that the Norfolk Gardens is not properly identified, not is the area between the west wall of the 9-hole golf course and Mewsbrook Park (the boundary being the gate east of the Sports Dome entrance).

The entire swathe from Harbour Park to the north east of Mwsbrook Park, as shown on the Key Diagram, must be included as an integrated whole.

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.

The National Planning Policy Framework includes a definition of a Local Green Space, which it is felt several, possibly the majority, of the valued spaces not currently included in this Policy fall into however, this can't really be said of spaces which do not

exist at the current time, nor ones that have not been legally accessible to the public hitherto unless exceptionally beautiful or of historic importance, (could apply to the North end of Academy land).

Viz. NPPF para 77...

The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:

- *where the green space is in reasonably close proximity to the community it serves;*
- *where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- *where the green area concerned is local in character and is not an extensive tract of land.*

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.

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.

A schedule of Assets of Community Value (See Additional Policies D, p1)

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.

6. Strategic Environmental Assessment (pp43-57)

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. The conclusion that the proposals for West Beach would have little environmental impact beggars belief (p56).

Additional Concerns outside the Policies

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

Concerns have been expressed that an 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. (referred to in Policy 4 and Policy 12 – would have a major effect on suggested Tourism Policy)

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 mean.

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? (Originally referred to in Policy 4: Housing Church Street/Fitzalan Road, p25)

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.

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.

A Health Facilities Policy (See Additional Policies E, p1)

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.