

# Middleton-on-Sea Parish Council

## Scoping Exercise on Neighbourhood Development Planning

### Project Group Report

Final Report 1<sup>st</sup> September 2022

#### **Summary**

*The Project Group was established by the Parish Council in order to find out what would be involved in producing a Neighbourhood Development Plan (NDP) including costs, to establish its context in relation to local planning, and to ascertain potential benefits, possible limitations and any potential disadvantages. The main issues were found to be:*

- *The local planning system is in disarray, defaulting to national policy with a "presumption in favour of sustainable development"; this means that, presently, planning applications must not be refused unless an adverse impact can be clearly demonstrated (such as environmental impact);*
- *Infrastructure deficiencies are significant, will be very costly to rectify and could substantially restrain the building of new houses in Middleton-on-Sea, but only if these deficiencies are adequately determined and properly documented;*
- *Unchecked development will also likely exacerbate environmental water quality problems, contrary to national regulations;*
- *There is, presently, a significant risk of major house building in Middleton-on-Sea that could overwhelm the Parish; planning applications are already being made or prepared at several sites and might extend to over 1500 new houses;*
- *A NDP will not substitute for or overcome the present planning problems but could provide a formalised vehicle (as a statutory instrument) for drawing attention to the infrastructure deficiencies that stand in the way of extensive development and might also stimulate alternatives to house building in Middleton-on-Sea;*
- *A NDP could confer substantial financial advantages to the Parish Council which could then make possible a much larger array of improvement projects within the Parish;*
- *Much of the expertise needed to produce a NDP is already available within the Parish and District Councils, keeping development costs to a minimum.*

#### **1. Introduction**

At the Parish Council meeting on 18<sup>th</sup> May 2022 members agreed to set up a Project Group to carry out a scoping exercise to help ascertain whether or not the Parish Council should produce a Neighbourhood Development Plan (NDP). The objectives were to provide an objective basis for the Parish Council to reach its decision and to report back at the Parish Council meeting on 21<sup>st</sup> September 2022. The Project Group comprised Cllr. Dr Colin Hayes (Chairman), Cllr. Paul Harris and Joe Lake (Parish Clerk) and it was agreed from the onset that its work must be evidence based and balanced.

## 2. Potential benefits, limitations and disadvantages of a NDP

According to Government Guidance <sup>(1)</sup>, neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They are able to choose where they want new homes, shops and offices to be built, have their say on what those new buildings should look like and what infrastructure should be provided, and grant planning permission for the new buildings they want to see go ahead. Neighbourhood planning provides a powerful set of tools for local people to plan for the types of development to meet their community's needs <sup>(2)</sup> where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area. A neighbourhood plan provides the local community with an opportunity to develop a vision for their future, including the preparation of policies and the allocation of land for development (housing or otherwise). Neighbourhood planning is encouraged by Arun District Council.

In general terms, the potential advantages of having a Neighbourhood Development Plan are <sup>(1)</sup>:

- ❖ It can protect areas from types of change (such as too much of one type of business)
- ❖ It can include policies to influence new building design, or alterations to existing buildings.
- ❖ It can protect or propose the creation of open spaces (green gaps, nature reserves, wildlife corridors, allotments, sports pitches, play areas, parks and gardens, and important historic assets)
- ❖ It enables the local community to retain more of the money collected from development, to spend on local projects.
- ❖ It gives the residents more say and control over their community
- ❖ It enables the community to ensure that it protects the things it values the most
- ❖ It enables change to be managed effectively and ensure it benefits the community
- ❖ It allows the community to encourage developers to build what is believed that the community needs and wants (such as greater numbers of affordable houses, developments more suited to elderly residents, etc)
- ❖ It can state where and what type of development should happen (new housing, or for businesses).

How these apply depends on local circumstances, needs and aspirations. There are no particular limitations to a neighbourhood plan although it must be compatible with the wider policies of the local planning authority (ADC).

There are no disadvantages in having a Neighbourhood Development Plan although:

- ❖ Knowledge of planning regulations and procedures must be sufficient
- ❖ The community must follow a set process and meet a number of statutory tests, which lengthens the process, potentially add costs, and requires some planning expertise

- ❖ There are costs in preparing a plan, both in the time and resources required, and the Skills required by the neighbourhood planning team must be sufficient
- ❖ At the appropriate time it is necessary to pass a local referendum.

### **3. Information, data gathering and perspectives**

#### *3.1 Methodology*

The work of the Project Group entailed: zoom meetings or correspondence with Arun District Council (ADC), Portsmouth Water, Southern Water and West Sussex County Council (WSCC); a questionnaire to the sixteen Town and Parish Councils in Arun District that have a “made” NDP; a review of the relevant sections of the Arun Local Plan, ADC’s Housing & Economic Land Availability Assessment (HELAA) for 2021 (most recent), the Environment Agency’s South East River Basin Management Plan and Southern Water’s Drainage and Wastewater Management Plan; published planning and NDP guidance; and a review of the NDPs implemented in several local council areas. The findings of the Project Group are summarised and referenced in the text that follows. The text is supported, as appropriate, by appendices. More detailed information is held by the Parish Clerk.

#### *3.2 NDPs in Arun District*

To put a possible NDP for Middleton-on-Sea into perspective, **Figure 1** shows that sixteen out of the twenty-one local councils in Arun’s planning district already have a “made” (approved) NDP <sup>(3)</sup>, a further two are designated to have a NDP, leaving only three without a NDP, of which one (Poling) is a very small Parish “meeting”. Along with Aldwick, Middleton-on-Sea is part of a small minority of Town and Parish Councils in not having a NDP (either designated or made).

The questionnaire sent to the sixteen local councils (that already have a NDP) and a summary of their responses is shown in **Appendix 1**, for those that responded.

It is evident that:

- The “shape” and relevance of a NDP depends on the local circumstances, which vary, such as the extent of land availability;
- Generally, the local councils considered that their NDP had been beneficial to local planning and helpful in drawing attention to numerous local issues;
- However, there did appear to be a relationship between the extent to which the NDP was embraced by Councillors and the extent of benefits realised;
- Further, some councils have lost their enthusiasm for NDP in the light of the present planning problems in ADC;
- One council felt that their NDP had provided an extremely important policy basis for wildlife corridors;
- The production of the NDPs typically took two years at a cost to the council of about £20,000.

#### *3.3 Review of existing NDPs in Arun District*

Six Parish Council NDPs were selected as exemplars in order to examine typical contents and the extent of topics addressed. The six Councils were Clymping, Felpham, Ford and Yapton (our nearest neighbours), plus Walberton with a rural character and East Preston with a seaside character. Their NDPs are available to download from the ADC website.

The contents followed a generally similar pattern of:

- Foreword
- Introduction
- Planning context
- The Parish today
- Vision and Core Objectives
- Policies and their implementation
- Supporting evidence

The issues covered variably included:

Housing: development allocations and their locality, types of housing required, affordability and design guidance; supporting infrastructure;

Community wellbeing: health care, care for the aged, protection of community assets, green spaces, leisure and meeting facilities, street lighting;

Environmental wellbeing: preserving rural character, conservation, maintaining the gap between settlements, protection of open views, buildings and structures of character, flood control, protection of water courses, biodiversity, protection of trees and hedgerows, archaeological heritage, promotion of renewable energy, allotments;

Getting around: traffic management, car parking, foot and bridlepaths, cycling and cycle paths, bus routes, school transport;

Business and tourism: employment, adequacy of internet services, local shops and commercial services, access to the beach and seafront, accommodation.

Many of the issues listed above apply to Middleton-on-Sea.

#### **4. Problems with planning in Arun District and their ramifications**

##### *4.1 Tackling the under-supply of housing*

A Research Briefing published <sup>(4)</sup> in the House of Commons Library on 4 February 2022 identifies the Government's ambition to build 300,000 new homes per year by the mid-2020s. New housing supply is currently lower with 243,000 supplied in 2019/20 and 216,000 in 2020/21. The Planning White Paper (August 2020) proposed <sup>(5)</sup> a range of reforms to speed up and simplify the planning process but these appear to have been put on hold following recent ministerial changes. The challenges highlighted include the likely requirement for major public sector investment, availability of suitable land, local authority planning resources, the funding of essential infrastructure to support housing development, encouraging small and medium sized building firms, and ensuring that the construction industry is fit-for-purpose (eg: through improved training). It is not clear how the Government's ambition for new housing supply is transposed into Local Authority planning targets or how this is expected to change.

##### *4.2 Arun Local Plan*

Within the Plan period 2011-2031 <sup>(6)</sup> at least 20,000 new homes will be accommodated in the District. However, within the allocations shown in the Plan's Table 12.2, there is no mention of Middleton-on-Sea. Table 12.3 indicates that ADC will produce Non-Strategic Site

Allocations for those areas without a Neighbourhood Development Plan, but does not indicate what these are.

The planning system in Arun District and its relevance to neighbourhood planning were reviewed in a zoom meeting with Donna Moles (Principal Planning Officer, ADC) on 23<sup>rd</sup> June 2022. The questions raised and the answers provided are summarised in [\(Appendix 2\)](#).

In essence:

- The policies contained in the Arun Local Plan no longer apply as they are presently deemed “out of date” because ADC is not able to demonstrate a 5-year housing supply (presently, it can only demonstrate a 2.4-year supply);
- Further, ADC’s failure to demonstrate at least a 3-year housing supply presently undermines the planning policies of a NDP;
- In both cases, planning decisions default to a “presumption in favour of sustainable development”, as stated <sup>(7)</sup> in paragraph 11d of the National Planning Policy Framework (NPPF), meaning that planning applications must be granted **unless** “any adverse impacts ..... would significantly and demonstrably outweigh the benefits” of the planning proposal.

In achieving sustainable development, the NPPF (paragraph 8) states that the planning system must have three overarching objectives: economic, social and environmental. The latter objective addresses environmental protection and includes “using natural resources prudently” and “minimising waste and pollution”. Some of these aspects are addressed further in section 5 (infrastructure). It should also be noted here that paragraph 12 of the NPPF states that “the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making”.

If the Parish Council is to keep excessive and inappropriate housing development in check, it is essential that its requirements for environmental protection are clearly understood and communicated to all relevant parties. Consideration should be given to the preparation and publication of a standing set of “planning conditions for environmental protection” for application to all future planning applications in Middleton-on-Sea. This would progress more substantially the concerns already expressed in the Parish Council’s letter to ADC dated 10<sup>th</sup> September 2017.

#### *4.3 Housing & Economic Land Availability Assessment (HELAA)*

HELAA is a “technical and theoretical assessment of sites that could potentially contribute towards the future supply of housing and employment land”. The latest review by ADC <sup>(8)</sup> was published in 2021 and differs substantially to the review published in 2020 <sup>(9)</sup> which had far more houses identified for Middleton-on-Sea; the reason for this difference is not clear. Further, it is not clear how the data from HELAA provides any firm basis for the Arun Local Plan. From the dialogue with Donna Moles, it is apparent that 200 new houses are required to satisfy the Local Plan, based on the “draft housing methodology agreed for consultation” in October 2018; there is no record that this number was ever agreed by the Parish Council and as noted above there is no mention of this allocation in the Local Plan. The Parish Council may wish to challenge this presumed allocation.

For Middleton-on-Sea, HELAA 2021 identifies 189 “deliverable sites” (= the number of houses) at land to the south of the A259 (Ref: FP17 – Poultry Farm), 6 “developable sites” (= the number of houses) at 86 Middleton Road (Ref: FP20) and 11 “not currently

developable sites" which relate to potential housing development sites (not housing numbers), that are detailed in [Appendix 3](#). The terminology used in HELAA 2021 is very confusing. HELAA 2021 also indicates that there are "commitments" at land west of Yapton Road, Poultry Farm (planning reference M/45/16/PL), albeit these are not quantified but presumed to be reference FP17. Further, HELAA 2020 identified 78 new houses for land south of Ancton Lane, presumed now to be out of date, albeit it is subject to current development enquiries. Again, this is very confusing. There is an obvious need to more formally review HELAA with ADC and to understand how this relates to housing allocations to Middleton-on-Sea; the Parish Council may wish to challenge the outcome.

#### *4.4 Land owned by West Sussex County Council*

Correspondence with Elaine Saunders (Head of Assets) confirmed WSCC ownership of Elms Farm, Guernsey Farm and Yapton Road Poultry Farm, as illustrated by [Figure 2](#).

*She confirmed that WSCC has the following sites being "promoted" in the HELAA -*

- a. HELAA Ref FP17 Land South of A259 – Yapton Poultry Farm – site is currently let to a farmer but is in the HELAA with long term potential for development
- b. HELAA Ref M7A Land North of Ancton Lane – Elms Farm - site is currently let to a farmer but is in the HELAA with long term potential for development
- c. HELAA Ref M7B Land North of Ancton Lane – Guernsey Farm - site is currently let to a farmer but is in the HELAA with long term potential for development
- d. HELAA Ref 114 Land South of Ancton Lane – Elms Farm – WSCC is working on bringing forward a planning application on this site and will welcome the opportunity to discuss the plans with the Parish in due course.
- e. Guernsey Farm Buildings – recent planning application approved for change of use M/99/21/PL - Property will be marketed by Strutt and Parker in due course; currently let to a farmer
- f. Guernsey Farm House – WSCC is exploring other potential WSCC service uses for this house.

Correspondence with Deborah Urquhart also confirmed WSCC ownership of the three farms and their current letting status. She stated that the use of WSCC land for an environmental study centre (location not specified) had been rejected twelve years ago, based on the facilities available in the County at that time. However, since then the profile of the environment and climate change has massively increased and further exploration should be considered. It is worth noting that paragraph 120 (a) and (b) of the NPPF encourages developments that would enable new habitat creation and recognises that "some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage ....."

#### *4.5 Proposed golf course*

A planning application <sup>(10)</sup> is under consideration for a new golf course to the east of Guernsey Farm, north of Elmer.

#### *4.6 Community Infrastructure Levy*

Since April 2020, developers must pay a community infrastructure levy (CIL) to help fund infrastructure development in the District <sup>(11)</sup>. The three farms owned by WSCC with development potential are in zone 5 for CIL charging purposes. The CIL charge in zone 5 is £99.40 per square metre (m<sup>2</sup>) and is a one-off charge. Part of the CIL charged is passed back to the Parish Council for development in its area.

If the Parish Council has a NDP, it will receive 25% of the CIL charged, uncapped. If the Parish Council does not have a NDP, it will receive 15% of the CIL charged, but capped at £100 per dwelling (x total number in Parish). As a worked example: for 189 houses, deemed "deliverable" in HELAA 2021, assuming an average floor area of 90 m<sup>2</sup>, the total CIL payable would be £1,690,794 (assuming no social housing deduction) of which £422,698 would pass to the Parish Council, if it had a NDP. Without a NDP, it would receive £253,619. The difference is much bigger (£848,850) for 500 houses (see [Appendix 4](#)) from which it is obvious that a NDP has major financial implications for the Parish Council.

## **5. Infrastructure**

### *5.1 Background*

The Government's Planning White Paper in August 2020 <sup>(5)</sup> draws attention to the challenge of funding essential infrastructure to support housing development. The Arun Local Plan for 2011-2031 further highlights infrastructure issues <sup>(6)</sup> as well as the need to protect water resources and enhance the quality of the water environment (Policy W SP1), making reference to the requirements of the Water Framework Directive. The infrastructure issues of environmental water protection, flooding, water supply and sewage disposal are linked and are considered below.

### *5.2 Environmental Water Protection*

The Water Framework Directive is enacted by Regulations <sup>(12)</sup>. These state that for surface water bodies the objectives are to: (a) prevent deterioration of the status of each body of surface water, and (b) protect, enhance and restore each body of surface water with the aim of achieving good ecological and good chemical status. The Environment Agency's South East River Basin Management Plan <sup>(13)</sup> covers Arun District and identifies Ryebank Rife as the Water Body relevant to Middleton-on-Sea. This currently has only "moderate" ecological and "moderate" chemical status with "bad" quality for dissolved oxygen. The target for achieving "good" status is presently 2027 but it seems unlikely that this will be met, due to disproportionate burdens and costs.

Any new housing development in Middleton-on-Sea has the potential to impact adversely on the Ryebank Rife Water Body, due to increased surface water drainage (not-with-standing the implementation of localised sustainable drainage measures) and the greater potential for overflows from sewage pumping stations. All planning applications for new houses in Middleton-on-Sea must be refused until and unless the potential for adverse impacts on Ryebank Rife has been reviewed thoroughly and any necessary mitigation measures have been identified. Developers must demonstrate that there will be no adverse environmental impacts, in line with the National Planning Policy Framework <sup>(7)</sup>.

### *5.3 Flooding*

The Environment Agency's risk assessment <sup>(14)</sup> for fluvial and tidal flooding shows parts of Elms Farm and Guernsey Farm to be in zones 2 or 3 such that any development must specifically identify the risk of flooding and the means for its mitigation (the flooding risk in zone 2 equates to an annual probability of between 0.1 and 1.0%, whereas zone 3 equates to >1.0%). ADC's flooding risk assessment for surface water shows <sup>(15)</sup> land west of Yapton Road in zone 1 and land east of Yapton Road in zones 2 or 3 with up to 25% annual probability. ADC also shows <sup>(16)</sup> that most of the land owned by WSCC in the northern part of the Parish is susceptible to groundwater flooding, (not surprising as Middleton-on-Sea lies

on the coastal plain) with knock-on consequences for sewer infiltration and increasing sewage flows, leading to more frequent overflows at sewage pumping stations and environmental pollution. Several localised surface water drainage systems are operated by Southern Water, one of which suffered flooding in 2012 due to a lack of maintenance.

Development on WSCC owned land in the northern part of the Parish must not be permitted without specific flooding risk assessment and the identification of mitigation measures.

#### *5.4 Water Supply*

Middleton-on-Sea is fed from four groundwater sources at Slindon, Eastergate, Westergate and Aldingbourne, with a transfer feed from Lavant Service Reservoir to improve resilience. Presently, the four sources are licenced to a combined 41 million litres per day (Mld) but this will reduce to 31 Mld from 2028 <sup>(17)</sup>, indicative of stress on water resources. The limitations to water supply resources in West Sussex have been clearly demonstrated during the recent pattern of hot weather in 2022 with the need to impose widespread hose pipe bans.

According to Portsmouth Water <sup>(17)</sup> a small increase in demand of 0.1 Mld, as a consequence of new housing, could be accommodated. However, an increased demand of 0.5 Mld and above could require a significant upgrading of treatment works and pumping capacity, involving significant investment <sup>(17)</sup>, likely to cost many £ millions, particularly if supplementary resources need to be brought into the area. Increases in demand between 0.1 and 0.5 Mld require further assessment.

Based on an assumed per capita consumption of 170 litres per head per day <sup>(18)</sup>, an average residency of 2.4 people per house <sup>(18)</sup>, and an assumed 25% leakage rate, 100 houses would have a baseline consumption of 0.054 Mld peaking (x2) at 0.11 Mld in the summer. For 200 houses the pro-rata baseline and summer consumptions would be 0.11 and 0.22 Mld. For 500 houses the pro-rata baseline and summer consumptions would be 0.27 and 0.54 Mld.

It is therefore very possible that the currently assumed <sup>(6)</sup> building of 200 new houses in Middleton-on-Sea may not be possible without significant upgrading of the water supply system. All planning applications for new houses in Middleton-on-Sea must be refused if the adequacy of water supply has not been clearly demonstrated.

#### *5.5 Sewage Disposal*

Sewage discharges from Middleton-on-Sea are treated at Lidsey WTW and Ford WTW <sup>(18)</sup>. Southern Water has indicated <sup>(18)</sup> that there is little spare capacity in the foul water (sewage) network. Local improvements are considered likely to be necessary and new pumping mains may be required. Communities in the Lidsey WTW catchment area have been experiencing foul water flooding of roads and property, which has led to the pollution of water courses. This is assumed to be caused by the sewerage system being overloaded, due to groundwater infiltration and surface water inundation, estimated to be 44% of "dry weather flow" (DWF) <sup>(18)</sup>. There are a total of ten pumping stations within the sewerage system <sup>(18)</sup>. The capacity of these pumping stations depends on the capacity of their rising mains and the gravity sewers downstream. Hydraulic modelling is required to determine these capacities as Southern Water does not currently hold this information <sup>(18)</sup>, creating significant uncertainty over the potential impact of any new housing developments.

For Lidsey WTW the consented "dry weather flow" (DWF) is 5,833 cubic metres per day (m<sup>3</sup>/d) with an average measured DWF of 4,963 m<sup>3</sup>/d in 2017-2019, implying some spare capacity. The consented flow to full treatment is 129 litres per second (l/s) equivalent to 11,146 m<sup>3</sup>/d and was fully compliant in 2020. The treated effluent is pumped to Ford WTW for discharge <sup>(19)</sup>. A baseline risk and vulnerability assessment (BRAVA) has been prepared by Southern Water <sup>(20)</sup> and indicates "very significant" risk bands associated with pollution risk, storm overflow performance, flooding due to hydraulic overload, nutrient neutrality and bathing waters: indicative investment needs total £ 3,415,000, with £1,200,000 up to 2030, £520,000 over the period 2030 to 2040 and £1,695,000 over the period 2040 to 2050.

For Ford WTW the consented "dry weather flow" (DWF) is 37,764 m<sup>3</sup>/d with an average measured DWF of 27,452 m<sup>3</sup>/d in 2018-2020, implying some spare capacity. All flows are treated and treated effluent discharges to the English Channel. The peak flow measured over the last five years was 740 l/s equivalent to 63,936 m<sup>3</sup>/d and was fully compliant in 2020. The baseline risk and vulnerability assessment (BRAVA) prepared by Southern Water <sup>(20)</sup> indicates "very significant" risk bands associated with sewer flooding, storm overflow performance, surface water management and bathing waters: indicative investment needs total £ 3,795,000, with £450,000 up to 2030, £1,180,000 over the period 2030 to 2040 and £2,165,000 over the period 2040 to 2050.

All planning applications for new houses in Middleton-on-Sea must be refused if the adequacy of the sewerage system has not been clearly demonstrated. The length of Southern Water's indicative investment profile suggests that restraints on development will need to apply for many years.

### *5.6 Others*

The broader definition of infrastructure includes health care centres, schools, community centres, roads and carparks, all of which could be stressed by major development in the Parish and would need to be addressed in a NDP.

## **6. Aspirations**

Alternatives to house building could be explored for the land owned by WSCC, including its use as an environmental study field centre. A field centre could become a "jewel in the crown" for the County, comprising a range of demonstration facilities that might include rewilding, carbon sequestration and flood control. It could be linked to educational establishments from primary schools to universities, providing "hands on" opportunities for academic study, the promotion of mental wellbeing and the encouragement of apprenticeships, whilst enabling the evaluation of land management techniques and technical innovation to prosper in the County. Contributions to funding could be envisaged from relevant Government departments, research councils and industry.

Dialogue with the residents of Middleton-on-Sea could identify many more aspirational ideas that might be included in a NDP.

## **7. Constructing a NDP for Middleton-on-Sea**

### *7.1 Stakeholder engagement and the involvement of Councillors*

The successful preparation of a NDP for Middleton-on-Sea requires **all** Parish Councillors to be involved to some extent. Their involvement will depend on circumstances, experience and expertise. It is also essential to engage Parishioners as much as possible and to involve selected Parishioners in the wide range of development activities. Development should start by informing ADC of the Parish Council's intentions and agreeing the extent of their anticipated support, followed by an initial publicity campaign involving a full article in Middleton News that explains the NDP, supported by a leaflet drop to all properties in the Parish. The publicity campaign would need to continue throughout development and discussions with ADC would be on-going.

### *7.2 Organisation*

It is proposed to establish a NDP Coordination Group that reports to the Parish Council, supported by five Task Groups:

- A. Community engagement: raising and maintaining awareness; appointing local "champions"; organising public meetings; setting up and maintaining appropriate NDP web pages on the Parish Council's website; preparation for the referendum;
- B. Planning policy: liaison with ADC; collating relevant guidance; determining land use proposals; recommending new housing allocations; preparing relevant policies;
- C. Community wellbeing: establishing the current state of the Parish, identifying needs and opportunities for improvement
- D. Infrastructure serving the Community: establishing needs for improvement, ensuring limitations are fully appreciated, promoting improvements;
- E. Improving the environment: establishing the current state of the Parish, identifying needs and opportunities for improvement.

### *7.3 Timescale*

The aim should be to have an approved ("made") NDP within two years.

### *7.4 Resources and Costs*

Most of the required human resources will come from the Parish that is Councillors and selected Parishioners, with the appropriate support of the Parish Clerk. Consideration should be given to engaging a planning consultant with expertise in the planning system to advise at the early formative stage and again towards completion. It is anticipated that the text of the NDP and its policies can be prepared "in-house", with some outside help in the preparation of visual aids and graphics.

The Parish Council's development budget should be limited to £20,000 spread over the two-year development period. Applications for grant-aid should be made to minimise the utilisation of this budget; these extend to up to £ 5000 from ADC and up to £10000 from Locality <sup>(21)</sup>. The Parish Council could also seek sponsorship from local businesses to off-set costs.

The costs associated with examination by ADC and the referendum are borne by ADC.

## **8. Conclusions**

In her Chairman' Report <sup>(22)</sup> for the Parish Council 2021/2022, Cllr. Haywood extended a welcome to residents "to come and see a Parish Council in action when it has the future and well-being of its residents at its heart". The preparation of a NDP is all about the future and well-being of the residents of Middleton-on-Sea.

The development of a NDP is entirely feasible using mostly "in-house" resources, given the active support of Councillors and residents with advisory input from ADC. The cost to the Parish Council should not exceed £20,000 and might be substantially less, assuming grant aid and possibly sponsorship are received.

The major threat to Middleton-on-Sea is the uncontrolled development of extensive new housing which cannot be supported by existing infrastructure, the cost of mitigation being prohibitive. The worst case could involve in excess of 1500 new houses, based on earlier ADC housing assessments <sup>(9)</sup>, thereby almost doubling the population of the Parish. The enormity of this threat needs to be appreciated by Councillors and by the residents of the Parish.

A NDP would provide a formalised vehicle, as a statutory instrument, to ensure that the infrastructure deficiencies are fully understood by the planning authorities, including any planning appeals to the Planning Inspectorate, ensuring that inappropriate development is held in check. It would also provide an opportunity for identifying alternative land-uses that could add value to the Parish. Further opportunities might also emerge across a wide range of topics of relevance to the well-being of the Parish.

A NDP could confer substantial financial advantages to the Parish Council which could make possible a wide array of improvement projects within the Parish.

## 9. References

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