

PART B - Your Representation:

** Please use separate sheets for each representation**

FEH representation 13 (sewerage and energy from waste)	Guidance Notes
<p>1. Please tick the document that you would like to make a representation on:</p> <ul style="list-style-type: none"> • Arun submission Local Plan Yes <input type="checkbox"/> • Arun submission Policies Map Yes <input type="checkbox"/> • Arun submission Sustainability Appraisal <input type="checkbox"/> <p><i>This form is difficult to use and we cannot work out how to tick the boxes digitally.</i></p>	<p>Please use question 1 to identify which submission document of the local plan that your representation refers to.</p>
<p>2. Your Responses:</p> <p>Which part of the Local Plan does this representation relate to?</p> <p>Paragraph number:</p> <p>Policy: TBA</p> <p>Other:</p> <p>Policies Map:</p>	<p>Please use question 2 to identify the exact part of the local plan that your representation refers to.</p> <p>If you are commenting on the Policies Map please state exactly which part of the map your representation relates to.</p>
<p>3. Do you consider the Plan is:</p> <p>a) Legally compliant?</p> <p style="text-align: right;">Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>b) Sound?</p> <p style="text-align: right;">Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>c) Compliant with the Duty to Cooperate?</p> <p style="text-align: right;">Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p><i>This question relates to the Local Plan in its entirety and not to individual policies. We have responded on that basis.</i></p> <p><i>We have answered NO to all 3 questions – but cannot work out how to tick these boxes digitally.</i></p>	<p>Please use question 3 to indicate whether you consider the Local Plan is sound, legally compliant and meets the requirements with regard to the Duty to Cooperate.</p> <p>If your comments or objections relate to the way the local plan has been prepared it is likely that your representation relates to a matter of legal compliance. Please read the separate Guidance Note for guidance on legal compliance.</p> <p>If your comments or objections relate to the content of the local plan it is likely that your representation relates to the 'soundness' of the local plan or the plan's compliance with the Duty to Cooperate. Please read the separate Guidance Note for guidance on 'soundness' and compliance with the Duty to Cooperate.</p> <p>It is recommended that you read the Sustainability Report which accompanies the Local Plan. The Sustainability Report appraises the policies in the Local Plan to ensure they reflect social, environmental and economic factors.</p>
<p>4. If you consider the plan to be unsound, please specify your reasons below by ticking the box(es) that apply.</p>	<p>Please use question 4 to specify why you consider the Local Plan to be unsound.</p> <p>ALL representations on matters of soundness will be considered by the Inspector.</p> <p>To be sound the Local Plan should</p>

- It has not been positively prepared. **Agree**
- It is not justified **Agree**
- It is not effective **Agree**
- It is not consistent with national policy **Agree**

This question relates to the Local Plan in its entirety and not to individual policies. We have responded on that basis.

These boxes cannot be ticked digitally.

The plan has not been positively prepared, is not justified, is not effective and is not consistent with national policy.

be:

Positively prepared - the plan should be based on a strategy which seeks to meet objectively assessed housing development and employment land requirements and the infrastructure and services needed to support it. In addition Arun may be required to meet the housing needs of neighbouring authorities where they are unable to, where it is reasonable to do so and consistent with achieving sustainable development

Justified - the plan is the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence

Effective - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

Consistent with national policy - the plan should enable the delivery of sustainable development in accordance with the policies in the [National Planning Policy Framework \(NPPF\)](#) and [Planning Practice Guidance](#)

5.
a) Please give specific details of why you consider the plan has not met legal or procedural requirements, or to be unsound, or why it has not been prepared in accordance with the Duty to Cooperate. Please be as specific as possible.

OR

b) If you wish to support any aspects of the plan, please use this box to set out your comments.

The main objective with village extensions is to utilise and therefore increase pressure on existing infrastructure like health facilities, schools, roads, sewerage etc. New settlements, on the other hand, provide their own infrastructure – placing much less burden on existing infrastructure, effectively spreading the pressure.

For instance, the existing sewerage network across the district already struggles to cope. A new settlement at Ford would utilise the adjacent sewage works (which has capacity), placing no additional pressure on the existing network.

Planning permission has been given for an incinerator at Ford (currently subject to a call in). The council has not given consideration to the opportunities for combined heat and power that arise from this proposed Energy from Waste plant.

OBJECTION: The council has failed to consider the opportunities for sewerage and energy provision that are available at Ford Airfield.

Please use question 5 to record any details necessary to support your arguments as indicated in questions 3 and 4.

Please note as there will not normally be another opportunity to add further information or to make further representations, so please include all the information and evidence necessary to support/justify your representation.

After this stage of consultation, further submissions will only be invited at the request of the Planning Inspector, based on the matters and issues the Inspector identifies for examination.

Your answer should describe all the information, evidence and supporting documentation you are relying on to justify your representation.

The Local planning authority is required to provide a Sustainability Appraisal (SA) Report when they publish the Local Plan. The SA Report should identify the process by which the sustainability appraisal has been carried out, and the baseline information used to inform the process of preparing the Local Plan and the outcomes of the policies.

Comments on the SA report are not confined to just 'soundness' issues; you can express your opinion on the SA report and use it as a reference point on the 'soundness' of the plan.

If required, please continue your response on an additional sheet of paper and securely attach it to this response.

6.

If you think that the Local Plan is not legally compliant, or is unsound, or has

Please set out the modifications you consider necessary to resolve the issues you have identified above.

Please explain why this modification will make the local plan sound and legally compliant.

It will be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as clear as possible.

not been prepared in accordance with the Duty to Cooperate and you think it could be changed to address this, please give details in response to question 6.

You should support your comments with evidence showing why the plans should be changed. It will be helpful if you could also say precisely how the policies should be changed. Comments should succinctly cover all of the evidence and supporting information necessary to support or justify the comment and suggested change.

Any non-compliance with the duty to cooperate is incapable of modification at examination.

If required, please continue your response on an additional sheet of paper and securely attach it to this response.

7.
Have you raised the matter you refer to in questions 5 & 6 at an earlier stage in the consultation process for the Local Plan ?

Yes No

If NO, briefly explain why you did not do so.

Yes – see Tony Dixon representation of 2nd September 2012. This representation was withheld from the Local Plan Sub Committee.

The Council has already considered representations from previous consultations and revised the Local Plan as appropriate.

8. If your representation is seeking a change to the local plan, do you consider it necessary to attend and give evidence at the hearing part of the examination ? (please tick the appropriate box):

~~No, I do not wish to participate in the examination hearings.~~

Yes, we wish to participate in the examination hearings.

These boxes cannot be ticked digitally.

Yes – we would like to speak at the EIP.

Please answer question 9.

The Local Plan will undergo a public examination after this stage of consultation. Please indicate whether you would like to participate in the public examination in question 8.

If your answer is NO, your representation will be considered by the Inspector by way of this written representation.

9. If you wish to participate in the hearing part of the examination, please outline why you consider this to be necessary.

Please give reasons on why you would like to participate in the public examination.

The inspector will determine the most appropriate procedure to adopt to hear

The Inspector needs to be made aware of the council's conduct relating to the national Eco Towns programme, in particular the council's campaign against strategic development at Ford, it's unsound public consultation and unsound Select Committee process.

those who have indicated that they wish to participate at the hearing part of the examination.

10. If you wish to meet with Arun District to discuss your representation to identify whether your concern can be resolved prior to Examination in Public, please tick this

box

We do not wish to meet with the council before the EIP.

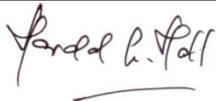
Arun District Council would prefer to address any concerns regarding the Local Plan prior to the Examination in Public.

Requests for meetings with officers of the Planning Policy and Conservation Team are welcomed.

Meetings will be based upon the key matters raised by the representation form and will only focus upon those matters that concern legal compliance, soundness and compliance with the Duty to Cooperate.

If the box is ticked, a meeting will be considered based upon the matters raised in the representation made. If it is considered appropriate, a member of the Planning Policy and Conservation Team will make contact to arrange a meeting.

Signature

Date

10th December 2014