

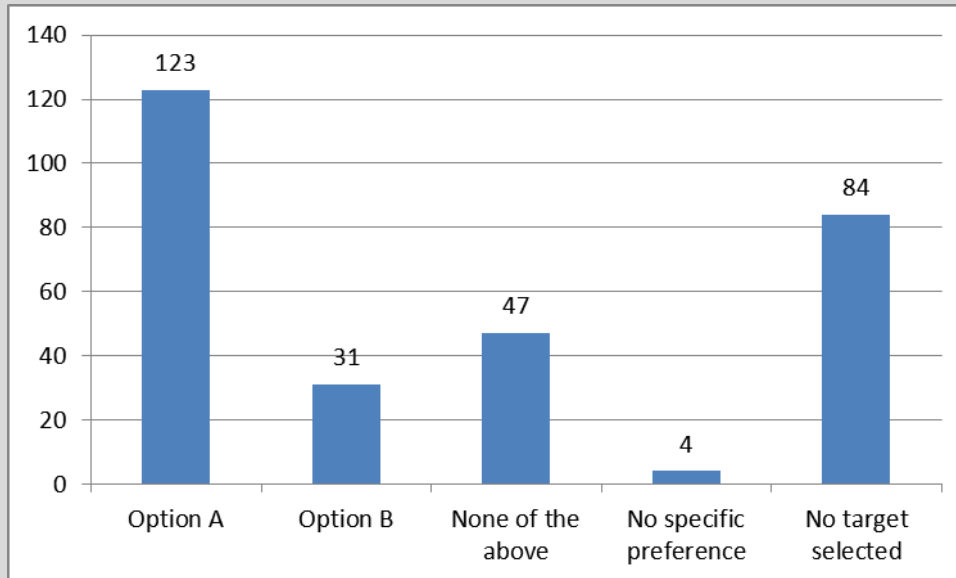
# **Summary of responses from Draft Adur Local Plan Consultation September-October 2012**



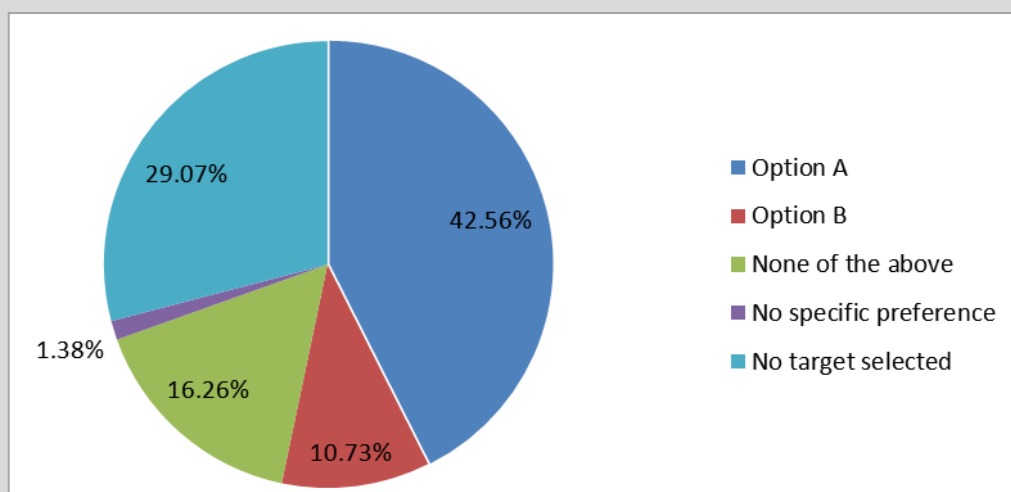
## **Introduction**

The Draft Adur Local Plan was made available for consultation from 19th September to 31st October 2012. The consultation sought views on 2 housing targets, 4 housing options and a number of objectives and policies. 289 representations were received in total and the main issues raised as part of this consultation have been summarised below. Please note that although this document just lists the main issues raised, every representation received has been recorded and will be considered as part of the Local Plan process.

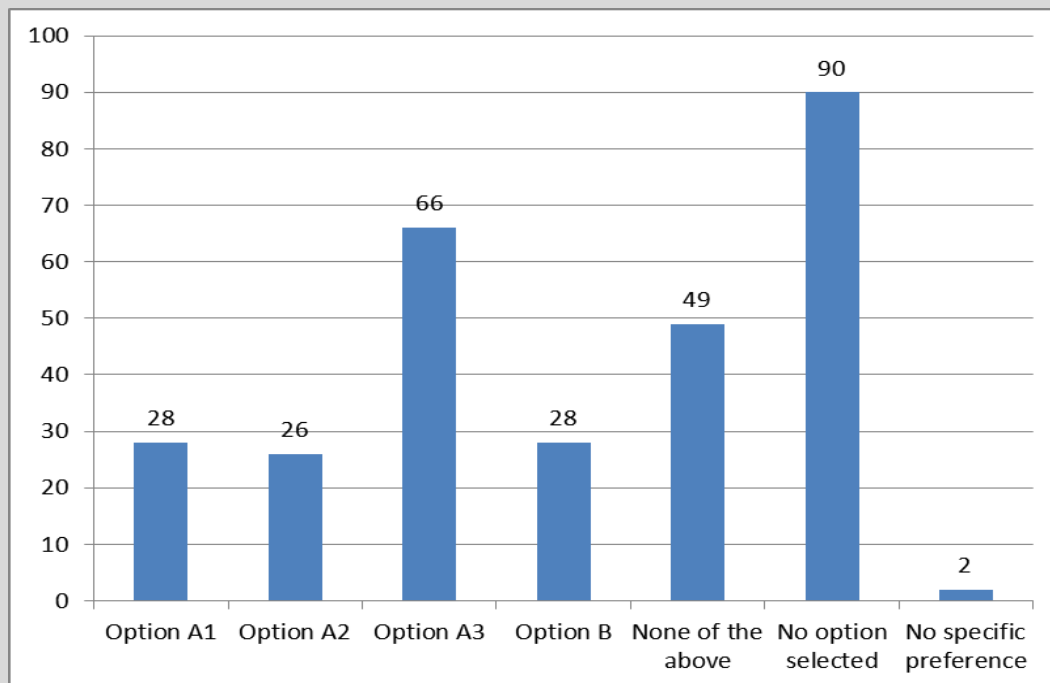
## Housing Target Results



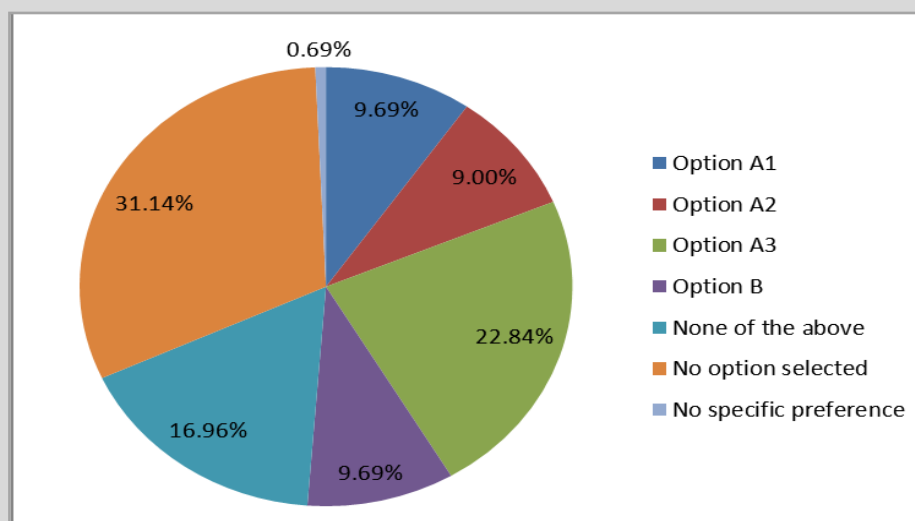
Housing Target	Number of votes	Percentage
Option A (1785 homes)	123	42.56%
Option B (2635 homes)	31	10.73%
None of the above	47	16.26%
No specific preference	4	1.38%
No target selected	84	29.07%
<b>Total</b>	<b>289</b>	<b>100.00%</b>



## Housing Option Results



Housing Option	Number of votes	Percentage
Option A1	28	9.69%
Option A2	26	9.00%
Option A3	66	22.84%
Option B	28	9.69%
None of the above options	49	16.96%
No option selected	90	31.14%
No specific preference	2	0.69%
<b>Total</b>	<b>289</b>	<b>100.00%</b>



As can be seen from the diagrams above, housing target A (1785 homes) was the more popular of the two housing targets and Option A3 was the most popular housing option. Those falling under the category 'None of the above' generally disagreed with the housing targets and housing options and in most cases considered that even the lower housing target was still too high. The category 'No specific preference' relates to those respondents that commented on the housing options but didn't express a specific opinion either way. The category 'No option selected' relates to respondents that didn't directly address the housing targets or options and instead commented on other policies within the Draft Plan.

## **Housing Options and Targets Representations Summary**

### **Housing Target A (1785 homes)**

**Housing Option A1 – A total of 1870 homes comprising: 870 homes proposed on previously developed land and 1000 homes on greenfield sites at New Monks Farm (450 homes), Sompting Fringe (250 homes) and Hasler (300 homes)**

Various comments were provided as to why Option A1 was preferable to the other options. Supportive comments and reasons chosen included:

- Appears to be the right approach for the foreseeable future
- Has less impact on greenfield land and would help the Hasler Estate regarding drainage
- Spreads the impact of housing
- Creates easier access for traffic
- Development is spread over three sites which will help road congestion
- Has the least impact on gaps
- A1 has least impact on Sompting Gap and prevents damage to Hasler watercourses

**Housing Option A2 – A total of 1770 homes comprising: 870 homes proposed on previously developed land and 900 homes on greenfield sites at New Monks Farm (450 homes) and Hasler (450 homes)**

The comments in support of this option were as follows:

- Has the least impact on Sompting
- Maintains the current target with a smaller impact on infrastructure
- The most sound option to integrate with current and improved infrastructure
- Has least impact on green gap and infrastructure
- Only option with infrastructure to support it

The main concerns regarding Option A2 related to the Hasler site and were as follows:

- Do not build on Hasler Estate as it would spoil the environment, increase flood risk , and access to A259 would require traffic lights.
- Do not build on Hasler, owing to the proposed airport expansion, wildlife concerns and inadequate road access. In addition, a survey should be undertaken with regards to wildlife.
- Hasler properties do not seriously flood because there is a flood plain to absorb water. The sewerage system would need to be sorted out, therefore Hasler should not be developed.
- More detail needed for Hasler, particularly in relation to flooding, sewage and access.
- Housing built on Hasler would cause more flooding and there are access issues
- Development on Hasler site would impact on flooding issues and the airport would likely have its licence revoked which would impact on jobs
- Hasler development is inappropriate owing to the need to maintain the rural environment, traffic, congestion, flooding issues and the need to retain areas for emergency landing of aircrafts.
- Building on Hasler would impact on house values, nature conservation and traffic
- Building on the Hasler Estate would cause more traffic congestion on the A259
- Much of the detail relating to Hasler has been supplied by the landowner without any verification and many statements are inaccurate or misleading
- More homes on Hasler would mean infrastructure could not cope.

**Housing Option A3 – A total of 1740 homes comprising:  
870 homes proposed on previously developed land and 900 homes on  
greenfield sites at New Monks Farm (450 homes) and Sompting Fringe (420  
homes)**

There were a number of comments in relation to why Option A3 was preferable to the other options and these are summarised as follows:

- Less impact on local green gaps and flood risk
- Option with least amount of housing
- Option that uses the least amount of greenfield land.
- 870 homes on greenfield sites would not put too much strain on infrastructure
- Does not use West Way as an access
- A3 is fairer to animals and birds
- Avoids the development of Hasler.
- A3 is the least damaging of the options
- Best option to cope with additional traffic
- Least detrimental effect on resources and amenities
- Best option unless work is done to prevent flooding on Hasler, in which case Option A1 would be best

Concerns raised for Option A3 have been sub-divided into Transport and Infrastructure and the impact on the character of Sompting.

#### *Transport and Infrastructure Provision*

Comments in relation to transport and infrastructure include:

- Sompting already has traffic problems and does not need extra congestion
- Sompting Village is subjected to traffic avoiding the A27
- Lancing and Sompting cannot support this level of building, owing to a lack of infrastructure, including schools and health facilities provision

#### *Character of Sompting*

Concerns in relation to the character of Sompting include:

- If development occurs in Sompting, the gap will be lost and the village will lose its identity
- Nothing is being done to preserve Sompting Village and it can't take any more traffic
- There is no decent shopping like in Shoreham, where most of the Council tax is spent.

## Housing Target B

**Housing Option B – A total of 2700 homes comprising:**

**870 homes proposed on previously developed land and 1830 homes on greenfield sites at New Monks Farm (600 homes), Hasler (600 homes), Sompting Fringe (420 homes) and Sompting North (210 homes)**

A number of supportive comments were provided for Option B and these were as follows:

- Higher option offers a balance between needs based and capacity based target. This level of development would enable larger, regeneration focussed sites to come forward. Smaller brownfield sites would not be able to deliver regeneration and infrastructure benefits.
- Housing will regenerate Lancing providing the infrastructure is in place
- Build as many houses as possible, as it is the only way out of recession
- It would improve Hasler roads and provide social housing
- Best option as provides housing and provides infrastructure
- Growth at or above this option is required to address need.
- Using this brownfield and low grade land is more sensible than building on land in Shoreham town.
- Need more housing in the area
- Need more housing without spoiling the existing character of towns and the “Green Belt” is not visible except near the airport
- Development behind Hasler would improve the area
- Support target as it will keep Shoreham town free from random development and will improve the Hasler estate
- Need as many homes as possible and need to use as much available land as we can
- Support as we need homes for local people
- Support as option would improve infrastructure issues at Hasler
- Brighton & Hove City Council state that this option makes a greater contribution towards needs whilst recognising it is unlikely to meet all needs, as required by the NPPF and Duty to Co-operate.
- Approve of new bridge and Ferry Road proposals in Shoreham



The following concerns were raised regarding Option B:

- This option would cause greater road congestion
- Option B is excessive and would have a significant impact on the quality of the environment and would generate additional traffic
- Against Option B, owing to green gap, wildlife, traffic and character of Sompting
- This option would swamp existing housing and infrastructure
- Option B could not cope with traffic increases

## **General Issues/Concerns Raised Regarding all of the Options**

The following general issues/concerns were raised which are relevant to all 4 options (A1, A2, A3 and B):

- The view was expressed that the consultation should have been delivered to every door in the district and there were also concerns regarding the lack of time to respond.
- Concerns at impact of traffic on Grinstead Lane.
- If we need more housing we have to be sure infrastructure can cope
- Understand the need for new homes, but this seems excessive given infrastructure and flooding issues
- Young people, especially care leavers, need affordable housing. Can a quota for such leavers be agreed?
- More affordable housing needed for first time buyers, in particular 2 and 3 bed houses with gardens, not flats.
- Need more homes, but concerned about infrastructure
- Flood defences should be built
- Need infrastructure in place for all sites proposed
- Concern that development would compromise the Sompting gap which is very narrow.
- Do not agree with the housing number on sites and the assumptions of density 35 dwellings per hectare. By increasing the density to 50 dwellings per hectare, it would reduce the damage to greenfield sites
- Greenfield sites must be protected, therefore densities should be increased and high rise development should be provided. There is no consideration of this in the plan.
- Build more high rise apartments to stop urban sprawl
- Concerned about building on floodplain and consideration should be given to certain areas having no development
- Flood risk prevention required
- All sites have risk of groundwater flooding
- Against building on green gaps unless development provides access to these gaps
- Safety concerns regarding the proximity of Shoreham Airport to proposed new developments

## None of the Above Options

A large number of respondents refused to support for any of the options. A variety of reasons for this were provided and a number of concerns were raised in relation to proposed development at the sites identified.

Reasons for choosing 'None of the Above Options':

- South East of UK is already grossly overpopulated
- The consultation is a waste of money, the Council will go ahead regardless
- All four options propose too much development
- Proposed level of housing is too high
- Option A figures are excessive and Option B figures are totally unacceptable
- With some modification, reduction in numbers and necessary adjustments to infrastructure, Option A1 would be the most acceptable.
- The amount of housing proposed in all of the options is far too high and unsustainable.
- No option chosen because New Monks Farm is in all options
- No development should be considered without an A27 bypass
- Pollution will increase and rat runs will get worse
- Whole south coast corridor is congested
- Roads are over capacity, there are water shortages and no jobs
- Need to improvements to A27 before development is considered
- Need new schools, health facilities, improved access to A27 and pollution controls
- We don't need more housing, we need better infrastructure
- There should be no housing on "greenbelt" land
- Need to keep green gaps or coast will become one housing estate
- Concerns regarding the impact on the character of the area and wildlife

*Alternative Suggestions were made that did not include development on strategic Greenfield sites and mainly consisted of focusing development on Brownfield land only and maximising development at Shoreham Harbour :*

- Should use brownfield sites first
- Option A – more use should be made of brownfield sites and address empty properties to help achieve targets
- No building on Greenfield sites as there are plenty of brownfield sites available
- Plan must specify that brownfield sites are a priority over any other sites
- Lancing Manor Residents Association - 2,700 houses is far too many for the area to sustain and instead should start with the 870 homes on brownfield sites
- Only brownfield sites should be considered and more effort should be made to use these no matter what the size.
- South Downs Society chose no option, but supports the emphasis on lower targets with an emphasis on brownfield development.
- Build on Cement Works rather than on green gaps
- Use only brownfield land then stop.

- Would it not be preferable to use Shoreham Harbour site which is unattractive and would benefit from development?
- No objection to regeneration of Shoreham Harbour, provided the road access is suitable
- Use existing infill and Shoreham Harbour to the maximum
- All Options place a heavy burden on developing New Monks Farm, but a better option would be smaller pockets of development.
- More development should be focussed at Sompting
- Housing should not be so concentrated, instead it should be dispersed between Sompting, Lancing, Hasler, Southwick and Fishersgate.

Specific concerns were raised in relation to constraints within Adur and have been sub-divided below into relevant categories. These include Flood Risk, Local Green Gaps and Biodiversity, Transport /Road Infrastructure, Other Infrastructure and Conservation and Heritage.

#### *Flood Risk*

Key concerns are identified below:

- Flood risk and ineffective surface drainage at New Monks Farm
- Development at New Monks Farm will worsen flood risk elsewhere
- Flood risk associated with the Hasler Estate. A resident has suggested that a solution would be to provide storage for excess water, either in the form of an underground cistern or a deep open “pond” together with a necessary pumping station and drain to deliver the water direct to the River Adur at low tide. The cost might be prohibitive but direct access of such a drain to the sea would not be possible due to Widewater Lagoon
- Flood mitigation at New Monks Farm and the Hasler Estate would be would be very costly and there will be problems with insurance due to flood risk, which will not be an incentive to come to the area.
- Overreliance on greenfield sites in areas at risk of flooding

### *Local Green Gaps and Biodiversity*

Key concerns raised are shown below:

- Loss of strategic gap and resulting urban sprawl
- New Monks Farm will mark the beginning of the end for the gap
- Wildlife value of these sites is not adequately taken into account.
- Development would seriously compromise Sompting Strategic Gap, which is already very narrow.
- 'Green Belt' should be preserved.
- At what point will development in the gap stop?
- Development at New Monks Farm and the training ground will take away vital green gaps used by birds, animals and plants as natural corridors for movement.

### *Transport / Road Infrastructure*

Key concerns raised are as follows:

- Lack of road infrastructure
- Should plan for the 870 homes on brownfield land now and review the plan as and when the A27 problem is solved by a bypass to free it up
- There would be serious traffic implications regarding Dankton Lane and its junction with the A27 which could only be 'left-in, left-out', causing extra traffic movements on the A27 in both directions, all the way from Lyons Farm to Busticle Lane intersections.
- The A27 and A259 cannot take any more
- Concerns in relation to the impact of development on highway network
- Lancing roads should not be allowed to become "rat runs" or abused by HGVs.
- Until a bypass is in place, Lancing can't take any more traffic
- Inadequate road infrastructure
- Concerned in relation to direct access from New Monks Farm onto A27, particularly as access from the already built up area to the west onto Grinstead Lane would be difficult. It is suggested that the number of 450 homes could be reduced to overcome these difficulties.
- Concerned over the impacts of the A27, Mash Barn Estate and Grinstead Lane, as well as the danger to children and the elderly
- The belief that people will turn to bicycles and public transport is misplaced

### *Other Infrastructure*

Key issues identified are as follows:

- Concerns in relation to water supply
- Already have issues with traffic congestion, demands on schools, hospital and health centres
- Need clearer answers in relation to flood risk, the impact on the A27, the quota of affordable housing and water availability
- Concerned in relation to flood risk, the impact on A27, current infrastructure (schools, doctors and dentists), the impact on wildlife, privacy and the loss of the character of Lancing
- Concerned about the impact on infrastructure, the environment and local businesses.
- Several amendments to the plan are suggested, including a new school on land north of the A27 by Sompting/ Hill Barn traffic lights

### *Conservation and Heritage*

Key concerns are shown below:

- English Heritage are not supportive of Option A2 or B as the proposed development would largely encircle the Grade II Listed Old Salts Farmhouse and would have the potential to adversely affect its setting and its significance. Option A1 would have less impact on the Listed Building but reference should be made in Paras 2.42-2.53 to the proximity of the Old Salts Farmhouse and the need for development to respect its setting.
- Any new development in Sompting would be accessed via West Street which is a country lane in a Conservation Area.

## **General Comments on the whole of the Draft Adur Local Plan**

- West Sussex County Council (WSCC) stated the Local Plan needs to be more concise with better focus; supports a follow-up transport study; and suggested updates to the text in relation to the Waste and Minerals Local Plan.
- The Highways Agency wishes to review the current transport study and be involved prior to submission.
- Arun District Council has stated that they would welcome a discussion of constraints and more regular on-going dialogue.
- Coastal West Sussex Partnership (CWS) welcomed the reference to the CWS Strategic Planning Board and suggests that greater reference should be made to opportunities available in Adur. They believe the Local Plan appears more reactive to government policy rather than embracing change and new policy for the future, and were concerned there was no requirement for the provision of high speed broadband.
- Southern Water are concerned that there is no policy referring to utilities infrastructure.
- Issues raised by local residents include: an objection to the Local Plan as a whole; the Local Plan is unimaginative; the maps were difficult to read; lack of publicity for the Local Plan consultation; the plan overlooks a number of small sites, which should be considered first before identifying sites in the gap; more brownfield sites and lists examples. Another resident proposed arterial routes through the airport and New Monks Farm; concerns regarding the impact of 1,000 dwellings on the A27.
- The Shoreham Society stated that the sense of place and character should not be compromised; the Local Plan should emphasise the replacement of poor housing, not increase population density. They also recognise the need for a diverse community and also state that more parking is required. Building on flood plains should be designed with climate change in mind, not relying on flood barriers, because groundwater and water from the Downs can be a problem in the area. They also question how sustainability issues will be enforced and also the need for positive suggestions for addressing health and wellbeing.
- The 'Say No to New Supermarkets in Shoreham' group are concerned that policies in the Local Plan do not go far enough to mitigate the negative impacts of large supermarket developments in Shoreham and protect local businesses.

## **Part One – The Adur Local Plan**

### **Introduction and Welcome to the Draft Adur Local Plan 2012**

- The South Downs National Park Authority (SDNPA) requested references to the SDNP and district be clarified. The South Downs Society supports reference to the need to have regard to the National Park in preparation and implementation of the Local Plan.

### **The Duty to Co-operate**

- The South Downs National Park Authority welcomes the acknowledgement of environmental capacity constraints that the National Park places on the district.
- Mid-Sussex District Council and Horsham District Council raised concerns that the Local Plan does not make it clear how unmet housing needs will be dealt with. In particular, Mid-Sussex stated that they are unlikely to be able to accommodate additional growth due to unmet needs from other authorities. West Sussex County Council stated the Duty to Co-operate section should be updated.

### **A Spatial Portrait of Adur**

- St Mungo Community Housing Association refers to the growth in extreme homelessness and the role of private sector. They also state the importance and need for more affordable housing.
- Issues raised by residents include: the drainage of water from the Downs, creating flooding in the New Monks Farm area; that pressure for retail development in Shoreham should be recognised as an issue; and a resident questioned why some sites at high risk of flooding are being prioritised over medium risk sites.

### **Key Issues for the Local Plan**

- Support for the key issues section was indicated by 3 respondents; English Heritage South East welcomes Key Issue 11 (maintaining and enhancing the quality of the built, historic and natural environment). Clarification/rewording has been suggested by West Sussex County Council (Key Issue 7 - addressing road congestion and related pollution whilst improving the transport network) and the South Downs National Park Authority (SDNPA) (Key Issue 3 – balancing development and regeneration requirements against the limited physical capacity of the District without detriment to environmental quality).
- The Environment Agency has requested that the Key Issues, as well as the Vision and Objectives sections be strengthened to better protect and enhance water quality (surface and groundwater) and that more explicit reference is made to biodiversity.
- The 'Say No to New Supermarkets in Shoreham' group has highlighted the need to safeguard existing employment locations and protect local businesses.

## **Vision and Objectives of the Adur Local Plan**

- Two respondents support these in full; English Heritage welcomes Vision 6, 7 11 and Objective 6. The Highways Agency supports the Vision and Objectives, particularly with respect to working with the Highways Agency and West Sussex County Council (WSCC), in relation to congestion on the A27 and in the promotion of sustainable travel patterns. The South Downs National Park Authority (SDNPA) supports the reference to SDNP in Vision 7 and Objective 6, requests that references to the statutory purposes and duty of the National Park are included. Natural England welcomes objectives 6 and 11, and proposes amending the objectives to address biodiversity *in relation to* green infrastructure.
- Northbrook College has commented that the Vision & Objectives section is silent on education and skill deficits, despite being referred to in the Issues section. They recommend particular changes and they also request the identification of the Northbrook Campus located at Shoreham Airport.
- The Environment Agency requests that the Vision and Objectives section is strengthened to better protect and enhance water quality (surface and groundwater) and suggests that more explicit reference be made to biodiversity. They also state that the Vision and Objectives could better protect and enhance water quality in accordance with the Water Framework Directive.
- The Coastal West Sussex Partnership are concerned that the vision is long and complex, which may signal a lack of focus. Similarly, WSCC have stated that relationship between both the Issues and Vision and Objectives section could be improved, by being more concise and having a clearer focus. They also suggest that Vision 8 could be condensed.
- Strutt and Parker (on behalf of Hillreed Homes) state that the allocation of land at Sompting would support some of these objectives.
- The Theatres Trust support Vision 2, however, they are concerned that there is no policy to support it in terms of protecting and enhancing existing facilities, and no explanation for the term 'community facilities'. The organisation also supports Objective 2, but again there is no overarching policy to resist loss of existing community facilities.
- With reference to Vision 3, Enplan (on behalf of New Monks Farm Development Ltd) state that New Monks Farm should be identified as the only strategic site that can bring forward education and skills infrastructure. They also state that New Monks Farm should be included in Objectives 1-4.

## **Draft Policy 1: The Presumption in Favour of Sustainable Development**

- Adur & Worthing Business Partnership, Shoreham Airport Consultative Committee, Southview Area Residents Association, Strutt and Parker (on behalf of Hillreed Homes), Paul Carter Planning (representing Landstone Ltd, Taylor Wimpey Ltd, Mr Jeffries and Mr Goble) and Ricardo UK Ltd all support this policy and GVA support the overarching principle of this policy.
- The Shoreham Society have stated that the three key elements of the NPPF are subjective and that Neighbourhood Plans would be essential to prevent unwanted



developments, unless the Local Plan is robust enough to reject a development for local reasons, without having to resort to appeals.

## **Part Two – A Strategy for Change and Prosperity**

### **Draft Policy 2: Spatial Strategy**

- Shoreham Airport Consultative Committee, Adur & Worthing Business Partnership and Ricardo UK Ltd support this policy and Strutt & Parker (on behalf of Hillreed Homes), support the principles of the spatial strategy, although suggest omitting the word 'coalescence' from the policy. West Sussex County Council (WSCC) supports further (current) transport modelling and states that an assessment of strategic sites is required to minimise the need to travel appropriately. English Heritage welcome the commitment to respecting and maintaining the character of Sompting Village in Para 2.4 and the South Downs National Park Authority (SDNPA) have requested that the reference to 'District's needs' be clarified. Enplan (on behalf of New Monks Farm Development Ltd) generally support the spatial strategy, but they state that it is not clear what a 'strategic' site is. They also state that policies are located in various parts of the plan and none of the sites are called regeneration or mixed-use sites. They suggest that this policy should include reference to New Monks Farm.
- English Nature welcomes the consideration of landscape and access issues, but is concerned that development of Greenfield sites should not have an adverse impact on biodiversity, and that development should be required to contribute to the provision of an improved green infrastructure network.
- Comments made by residents in relation to this policy include the following: the spatial strategy must consider land within the BUAB as per Map 25 and some Greenfield sites on the edge of the BUA as a priority before other major developments are considered; the green gap across the River Adur from Shoreham should be fully maintained; that this policy significantly compromises Local Green Gaps, as do the Shoreham Airport proposals. The Southview Area Residents Association is concerned in relation to the use of Greenfield sites - care should be taken and public consultations undertaken.
- GVA has requested that new development consistent with the objectives of the emerging Local Plan and regeneration of Shoreham Harbour, should not be delayed pending the Joint Area Action Plan (JAAP). They suggest the need for a holistic approach to development and integration of Shoreham Harbour and the town centre, given the objective of securing better linkages between the two.
- Paul Carter Planning (representing Landstone Ltd, Taylor Wimpey Ltd, Mr Jeffries and Mr Goble) has stated that the acknowledgement of need for Greenfield land is welcomed.

### **Draft Policy 3: Level of Residential Development**

***Please also see comments in relation to Housing Targets and Options***

- Horsham District Council is concerned that the housing target has not been met in full and question how this deficit will be met. They request that Adur District Council is mindful of the potential negative impact on Horsham's transport corridors, particularly Steyning, Bramber and Upper Beeding, and that Horsham District Council

and WSCC are kept informed of any development proposals that may impact on these corridors.

- The South Downs National Park Authority (SDNPA) state that the target will need to be justified, in order to meet the test of the NPPF. They also highlight that the SDNP cannot meet any of Adur's unmet need where the need is located outside of the SDNP.
- Natural England is concerned at the lack of information in relation to the environmental value of each site; work undertaken to assess the ecological value of each site should be undertaken and reported in the Local Plan / SA/ SEA report. Natural England do not consider that the likely effects of development allocations in the Draft Plan have been assessed fully in accordance with SEA regulations. (These comments also apply to policies 4 and 5).
- Issues raised by four residents are as follows: one queries the requirement for 4,600 homes; another would like the South Downs to be kept clear and the strategic gaps to remain (and suggests that residential development at Shoreham Harbour will reduce Adur's requirement for homes); land north of The Street in Shoreham is suggested for residential development; and another concerned that the targets identified are too high, because of roads and traffic and the fact that Greenfield sites within the gap have to be used.
- Paul Carter Planning is concerned that the level of residential development fails to meet all objectively assessed needs and does not relate to the South East Plan figure of 10,000 homes at Shoreham Harbour; questions whether use of past delivery rates as an indicator of potential delivery is appropriate, as this trend reflects past policy; and suggests that no windfall allowance should be made and that this should only be done for small sites under the SHLAA threshold and that this allowance should not include dwelling yield from residential gardens.
- Strutt & Parker (on behalf of Hillreed Homes), have argued that the Option choice is inevitable due to the language of the document. They support Option B and are supportive of Sompting North as it scores well in the Sustainability Appraisal (SA). They highlight their concern that any reduction in figures at Sompting Fringe will reduce the ability of the district to meet its needs.
- Southern Water has provided information in relation to infrastructure requirements. They also highlight the fact that development will need to contribute to the local infrastructure required to serve it.

#### **Draft Policy 4: Delivering the Targets for Residential Development**

- The Environment Agency has stated that development should be directed to areas of lower flood risk. They also have concerns as to how Option A2 is justified and they would consider the plan unsound if this is progressed. They also query Option A1 with regards to the inclusion of Hasler and have provided detailed comments.
- Enplan (on behalf of New Monks Farm Development Ltd) supports New Monks Farm in each option. They also raise concern that the Sustainability Appraisal (SA) has not been able to score each site effectively.
- Paul Carter Planning (representing Landstone Ltd, Taylor Wimpey Ltd, Mr Jeffries and Mr Goble) has stated that the plan must accommodate Option B, including

Hasler, due to housing needs and the fact that a landscape study supports this. They have provided detailed information on this topic and have also highlighted that the Local Plan recognises that noise from the airport is not an impediment to development.

- West Sussex County Council (WSSCC) is seeking education infrastructure when these developments come forward and details are provided as to their requirements.
- Southern Water has provided information relating to the impact of proposed strategic sites on local wastewater and distribution.
- Strutt & Parker (on behalf of Hillreed Homes) suggest that growth at or above Option B should be planned for. They also state that an option at Sompting should be maintained in each scenario on the basis of the Sustainability Appraisal (SA) and Sequential Test and go on to say that it would be unfortunate, if by rejecting Option B levels of growth, that Sompting North was automatically rejected.
- The 'Say No to New Supermarkets in Shoreham' group has suggested that residential development should be considered at Parcellforce and the Civic Centre, rather than supermarkets.
- Issues raised by residents include: consideration of possibilities of increasing the capacity of A259 between Lancing and Shoreham, especially at Saltings roundabout and Shoreham High Street should be considered whichever option is chosen; and that roads and infrastructure need to be in place first, as well as drainage and flood mitigation on the Hasler Estate.

#### **Draft Policy 5: Strategic Site Allocations**

- Southview Area Residents Association agree with this policy, although have some reservations (unstated).
- Strutt & Parker (on behalf of Hillreed Homes) has highlighted the need for the sites in the plan to be viable and developable and that strategic sites should be identified that do not have barriers to development.
- West Sussex County Council have requested that text be amended to recognise that archaeological evaluation of housing land allocation is a requirement, and that road improvements should be accompanied by measures to encourage the use of sustainable transport (infrastructure and behaviour change initiatives).
- A number of residents state that the areas cannot sustain expansion, owing to infrastructure constraints; that Adur has no capacity for further housing, as the road system is at maximum capacity; that more allotments are needed; that business expansion is hampered by a poor road system; that the proposed development in Lancing and Sompting means that the provision of additional schools is essential.
- Cobbetts Developments have objected to the exclusion of other sites identified in the Urban Fringe Study 2006.
- Southern Water have suggested revised, separate policies for each strategic site in the next iteration of the Local Plan and also suggest that the policies should reflect requirements in terms of connections to local water distribution and sewerage systems.

#### *New Monks Farm Site (Paras 2.32 – 2.42)*

- The Environment Agency agrees with the flood risk assessment for New Monks Farm.
- Strutt & Parker (on behalf of Hillreed Homes), have stated that the submission draft policy for the New Monks Farm site must require the delivery of employment space and supporting infrastructure
- The South Downs Society are concerned that New Monks Farm is likely to impact visually on the National Park, therefore screening and landscaping will be necessary to mitigate.
- WSCC have requested that sufficient evidence be provided that demonstrates that the local road network could accommodate 100-150 new dwellings. They also agree that traffic should not use the route through new development to avoid Manor roundabout. Educational contributions are also addressed.
- The Highways Agency suggests that the New Monks Farm site will require a specific policy to include wording to require suitable mitigation on the road network.
- A resident has requested that the Council consider a railway station when developing New Monks Farm and Shoreham Airport.
- Cobbetts Developments object to the inclusion of New Monks Farm, owing to the impact on the green gap, Grade 1 agricultural land, road access, noise impact from the A27 and flood risk. They are also concerned that there is no evidence in relation to transport issues to support this proposal and comment that noise impact has been used to exclude the Shoreham Gateway site from the plan.
- Enplan (on behalf of New Monks Farm Development Ltd) propose that details of the site should also be included in Draft Policy 4 to aid understanding. They agree with Draft Policy 5 in that the total amount of land allocated should be 23 hectares, although the layout, density and land take for each element vary. They agree with Para 2.32 in that a significant amount of floorspace is included on site. In reference to Para 2.34, they do not accept that the majority of the site is Grade 1 agricultural land. They also include a reference to junction improvements, bus routes and sustainable transport links through the site and suggest more detail is provided as to how development can assist deprived neighbourhoods as identified in Para 2.41. They propose that the policy should make reference to the need for a new primary school on this site to address the need generated by all identified housing sites and that consideration be given to a separate policy just for New Monks Farm.

#### *Hasler Site (Paras 2.43 – 2.52)*

- West Sussex County Council (WSCC) have provided details of education infrastructure requirements.
- Enplan (on behalf of New Monks Farm Development Ltd) are concerned about delivery issues in relation to ownership and the Adur Tidal Walls project. They state that the Hasler site is sequentially the most unfavourable site owing to flood risk; that

it delivers few community benefits that are locally focussed; suggest that there are limited road improvements identified to deal with additional traffic; and raise the issue of noise disturbance from the airport.

- The Environment Agency supports the acknowledgement that the site is dependent on the construction of the Adur Tidal Walls Scheme, although they are concerned at the reliance placed on their delivery. They suggest that given the flood risk, a minimum of 1 year groundwater monitoring would be necessary and this will need to be stated in the policy, and that the ditch system needs to be preserved in layout.
- Three residents have highlighted concerns over aircraft safety as a result of proposed development at Hasler and three residents are concerned about aircraft noise which will affect people in their gardens in particular. A resident has also raised concerns in relation to school provision
- Six residents have concerns about the flood risk of future development proposed at Hasler Two residents have stated that existing properties at Hasler do not flood, but additional development on the Greenfield sites would mean less land for natural soakaway and would cause more flooding. They are concerned that converting the existing open drainage ditches could result in flooding; also that if groundwater is permanently excluded, subsidence is likely to occur, which would cause damage to properties. They also have concerns that the objectives of retaining a corridor for wildlife and natural habitat provision, as well as recreation have been ignored and also suggest that the reference to damage to properties in Para 2.46 is misleading, because there are no damage to homes and the homes have never flooded. Another resident is concerned that land to the rear of Hasler should be included in the National Park and proposes that the Council compulsory purchase the land for a wildlife sanctuary.
- A resident has requested that no additional development occur at Hasler without a clear plan to cope with traffic. Furthermore, three residents have raised concern over the impacts of proposed development on traffic and access. With regards to transport, one resident suggests that roads could be improved without additional building if all parties worked together and that sewers under Hasler could be improved if Southern Water and owners of roads worked together. They also raise concerns about congestion on the A259 and suggest that access via Broadway is not acceptable as the road is unsuitable.
- Cobbetts Developments object to the inclusion of the Hasler sites, owing to the impact on the green gap, and traffic congestion. They are also concerned that there is no evidence in relation to transport issues to support his proposal. They also state that sequentially, other sites (including Shoreham Gateway) are at less risk of flooding, yet are not included.

#### *Sompting Fringe Site (Paras 2.53 – 2.59)*

- The Environment Agency supports the requirement to direct the most vulnerable uses to areas at the lowest risk of flooding and proposes that reference be made to the Teville River Restoration Project and support the opportunity to enhance the existing Site of Nature Conservation Importance (SNCI).
- WSCC have provided details of education infrastructure requirements.

- Enplan (on behalf of New Monks Farm Developments Ltd) are concerned about the location of Sompting Fringe, as it is a sensitive site in a narrow gap adjacent to a SNCI. They state that the layout needs to take into account the power lines and they are also concerned that there are no community or regeneration benefits.

*Sompting North Site (Paras 2.60 – 2.62)*

- WSCC have provided details of educational infrastructure requirements.
- Strutt & Parker (on behalf of Hillreed Homes), have stated that sites at Sompting should feature in all development options, as Greenfield releases may be required earlier than 2017/2018 as predicted in the plan. They also state that other strategic sites are dependent on significant infrastructure whilst Sompting does not. They suggest that Sompting sites should feature in the Submission draft as envisaged under Options A3 and B. Sompting North should be regarded as a potential contingency, even though it features only in Option B. They state that phasing is likely to be dictated by infrastructure delivery and that the only exception should be in mixed-use schemes where there the need to ensure delivery of commercial elements justifies phased delivery of residential land. They support an assessment of infrastructure constraints on main strategic options.

**Draft Policy 6: Employment and Economy: Planning for Economic Growth**

- A number of bodies and companies including Adur & Worthing Business Partnership, Shoreham Airport Consultative Committee, Enplan (on behalf of New Monks Farm Developments Ltd) and Barton Wilmore LLP supported this policy.
- Natural England is concerned that the SEA/SA report identifies that development at Shoreham Airport and Shoreham Harbour promoted by this policy could impact on water quality (in the Adur Estuary SSSI) given their proximity to the River Adur, and that the developments at Shoreham Airport and New Monks Farm are likely to have negative impacts on the Local Green Gaps, although there is some potential to mitigate landscape impacts through provision of green infrastructure.
- Strutt & Parker (on behalf of Hillreed Homes), have commented that employment must be secured rather than just supported.
- Cobbetts Developments have objected to the exclusion of the Shoreham Gateway site from the strategic allocations section. Cobbetts Developments also state that the Shoreham Airport site should be excluded from the employment allocation or amended. They also suggest that the New Monks Farm site should be removed as encroachment into gap will make it hard to resist further encroachment in the future. They suggest that Hasler should be reduced to the minimum to strengthen its boundary and that the Shoreham Gateway site should be included as it is less constrained and more readily developable.
- Ricardo UK Ltd, Shoreham Airport Consultative Committee and the Adur & Worthing Business Partnership generally support the policy but have raised issues relating to transport and the highway network, employment types, linking development to deprived areas, ensuring the Plan is aligned with the Sustainable Community Strategy (Waves Ahead), phasing of development, the need for a mix of uses at the airport, infrastructure requirements, the need for educational investment in skills growth, the use of Growing Places and similar funds to unlock development and the Community Infrastructure Levy (CIL).

- Enplan (on behalf of New Monks Farm Developments Ltd) suggest that New Monks Farm should be considered separately from other greenfield sites for a number of reasons including the fact that it is the only mixed use regeneration site allocated in the Draft Plan.
- RPS Consultants have also commented in relation to New Monks Farm and have stated that it is not appropriate to rigidly apply a set amount of employment floorspace that can be accommodated at strategic sites and that instead, the policy should be made more flexible and any floorspace proposed should be indicative.
- The 'Say No to New Supermarkets in Shoreham' group oppose new large-scale supermarket developments in and around Shoreham and have concerns over the impact of such developments on local businesses.
- The Shoreham District Ornithological Society are concerned that once land is developed, it cannot be returned to its natural state.
- A resident has identified that local labour and suppliers should be used. Another resident has raised the fact that there is no mention of the Brighton & Hove Albion proposed training ground, or its position indicated, as well as its employment potential.

## **Draft Policy 7: Shoreham Airport**

### *General issues*

- Shoreham Airport Consultative Committee, Ricardo UK Ltd and Adur & Worthing Business Partnership are in support of the policy (noting that the dotted area on Map 13 is incorrect).
- Cobbetts Developments object to the 30,000sqm of floorspace at the airport due to the impact on gap & landscape, flood risk, poor access, noise, the fact there is a S106 agreement restricting development and the impact on the terminal building and Scheduled Ancient Monument (SAM). They are also concerned over the lack of information and studies in relation to the highway impact.
- Brighton & Hove City Council mention the 35 year covenant associated with the airport and also state that development should not jeopardise the runway use and airport operations.
- A significant number of businesses/tenants at the airport as well as residents raised concerns and objections to any loss of the grass runways at the airport and the resulting impact on the viability of the airport and loss of jobs. One resident was concerned that there is already too much non-aviation related business at the airport and a couple of residents were concerned by what they see as a gradual plan by the owners of the airport to make it "uneconomic".
- A business at the airport has suggested the establishment of an Airport Development Committee and requests that a safeguarding map is drawn up.

- Two residents, as well as a number of tenants at the airport, have argued that the development proposals, not just at the airport but also nearby, would have a significant impact on safety at the airport. A specific concern of a company located at the airport is that in the event of engine failure, pilots are trained to guide to suitable forced landing areas, including north of Hasler, east of New Monks Farm and the area occupied by Brighton Football Training Ground. Another resident argues that there is justification for expansion at Shoreham Airport.
- Savills (on behalf of Albemarle (Shoreham) LLP) have stated that the airport can deliver a flexible range of commercial uses and they have put forwards a new layout for development that would not result in the loss of the grass runways. This new scheme was supported by a company located at the airport.
- A company located at the airport is concerned about the lack of protection for existing uses in Shoreham Airport. They suggest that the importance of existing uses is not recognised and that there is a need to prevent uses coming forward that are incompatible with aviation. They also suggest that employment figures be revised downwards.

#### *Impact on Views, Landscape and the Local Green Gap*

- A number of groups including The Shoreham District Ornithological Society, CPRE, English Heritage, the RSPB as well as a number of businesses/tenants located at the airport and nineteen residents had concerns over the impact of development at the Airport on views and the open character of the landscape.
- A resident suggests an addition to the text in Para 2.87 to ensure that key views are protected.
- A resident has argued that the development will ruin views from the riverbank walks and that the relationship between the river and adjacent green space is a defining character of the green gap. Another resident has suggested adding text to the policy to protect views from the east bank of the river. The South Downs Society has argued that Para 2.92 needs to have full regard to the visual impact of development on the South Downs.
- A resident has suggested that trees be introduced along the riverside to screen new development and they also suggest that residential development would make better use of the attractive river views or a hotel.

#### *Impact on Biodiversity*

- Natural England, the RSPB, CPRE Sussex Countryside, a company based at the airport and four residents raised concerns about the impact of development on the Site of Special Scientific Interest (SSSI).
- Natural England have raised concerns that the allocation at the airport and the associated highway works may be likely to have an adverse effect on the Adur Estuary SSSI and its populations of wading birds, and that these effects have not been assessed or mitigated in the draft Local Plan. They note that work to assess the ecological and landscape effects of the development allocated in draft policy 7 is proposed, but consider that the work must be undertaken and reported in the Local Plan and its SA/SEA report. Without this information, Natural England do not consider the Local Plan is robust or based on up-to-date environmental evidence,



and that the potential effects on the SSSI cannot yet be determined. They also do not consider that the likely effects of the development of Shoreham Airport in draft policies 2, 6 and 7 have been assessed fully, in accordance with the SEA Directive or Regulations.

- Natural England also point out that the River Adur SSSI in the Local Plan (and SA/SEA report) also needs to be corrected to state the Adur Estuary SSSI.
- Issues raised by residents include: development along the west bank will compromise the wildlife corridor and make the area less attractive to birds; that the promise of further detailed work in Para 2.87, in relation to landscape and biodiversity, is a vital priority; that the area bordering the SSSI shouldn't be developed and that there are units at the airport not yet built and are currently to let; the development is an environmentally damaging proposal and that the plan has failed to take into account the ecological impacts; and that there are no possible ecological enhancements that could be put in place.
- CPRE Sussex Countryside Trust suggests that the SSSI designation should be extended all the way along the Adur estuary on the airport's eastern boundary.
- The RSPB have concerns regarding the scale of proposed development at Shoreham Airport and the proximity to the river and the impact on birds. They recommend a reduction in size of the development and relocation to the south of the site.
- The Shoreham District Ornithological Society has stated that it is a vital priority to ensure that any allocation at the airport is subject to a future landscape and capacity assessment.

#### *Flood Risk*

- The Environment Agency has requested recognition be given to the fact that the site is currently within Flood Zone 3b and is not currently acceptable for development. Three residents also have concerns over the flood risk of the site, as well as Cobbetts Developments.
- Savills (on behalf of Albemarle (Shoreham) LLP) have suggested that some development could be brought forward prior to the construction of the Adur tidal walls and also suggest some rewording of Draft Policy 7.
- RSPB are concerned that development would preclude further managed realignment.

#### *Access / Transport*

- A number of concerns have been raised regarding the impact of development on the highway network and increased traffic congestion. The Highways Agency has raised issues relating to the need to improve the Sussex Pad junction and have identified the need for the development to mitigate any material impact and to demonstrate overall viability.
- Savills (on behalf of Albemarle (Shoreham) LLP) have stated that any new access required to serve the airport should be located adjacent to the airport and Ricardos, rather than New Monks Farm.

- One resident has suggested that a new rail halt could service the Monks Farm area. Another resident has suggested that the airport railway halt should be reinstated and that a new enlarged bridge either over or under the railway should be introduced. They also refer to bus only use of the tollbridge. Another resident has requested that the Council consider widening the north-south perimeter track to make a public access road to the A27.

### *Heritage*

- English Heritage have requested that the airport's heritage assets be referred to in this policy and they object to the overall proposal, because they are not satisfied that 30,000 sqm could be accommodated without unacceptably detracting from important historic views.
- A resident is also concerned about the impact on the setting of historic buildings. Another resident has stated that there is a need to respect the historic importance of Shoreham Airport.
- Concerns were raised by tenants at the airport regarding the impact of development on the setting of historic buildings. They also request that an 'Airport Development Committee' be formed.

### **Draft Policy 8: Shoreham Harbour Regeneration Area**

- Adur & Worthing Business Partnership, Shoreham Airport Consultative Committee and Ricardo UK Ltd are supportive of this policy. Southview Area Residents Association is supportive with some reservations and GVA supports the broad location policy for Shoreham Harbour. Carats Café Bar is supportive of this policy and highlights the importance of Southwick beach. They also state that they are willing to work in partnership.
- A resident has stated that they see scope for upgrades at Southwick Beach and that the Council should look for input from existing Southwick Beach users.
- Brighton & Hove City Council is supportive of this policy and will continue to work in partnership with Adur District Council and relevant stakeholders.
- Barton Wilmore (on behalf of Edgeley Green Power Ltd) is supportive of this policy and makes reference to the proposed electricity generating facility.
- The Environment Agency suggests that consideration be given to highlighting the aspiration for exemplar sustainable development.
- Natural England would like to see more references to biodiversity and green infrastructure, as well as to coastal processes, the risk of coastal change, and the need for sustainable coastal management.
- A resident has stated that they consider that the scale of homes now proposed is more acceptable.
- Firstplan (on behalf of Day Group Ltd) have suggested that the plan highlight the long-term nature of the harbour proposals and deliverability changes. They highlight the importance of temporary consents for existing businesses to ensure that there is productive use of sites in the short term. They also highlight the important of being

consistent with the NPPF in relation to safeguarding wharfage and associated storage, handling and processing facilities. They suggest that the principle of granting temporary consents prior to the adoption of the Joint Area Action Plan (JAAP) should be stated in Draft Policy 8.

#### *Heritage and Conservation*

- English Heritage is supportive of the policy and suggests that any road implications should respect the character of the Conservation Area. They are also supportive of the proposed restoration of Shoreham Fort.

#### *Flood Risk*

- The Environment Agency suggests that the policy clarifies the scope of the Adur Tidal Walls scheme, as this area will not directly benefit from protection by this scheme and also suggests that the policy strengthens the reference to the need for flood defences to reduce the risk to the development and existing communities.

#### *Contamination*

- Environment Agency requests that reference be made to the need to mitigate the impacts of ground contamination.

#### *Minerals*

- Brighton & Hove City Council suggests that the policy needs to acknowledge the regional importance of the harbour for minerals and that there should be no net loss of the capacity for minerals handling.

#### *Infrastructure*

#### ***(See also comments made in relation to Housing targets and options)***

- The Highways Agency suggests that the policy make reference to the need to mitigate impacts on the A27 and the Sussex Pad junction, and refers to their commitment to continue working in partnership.
- A resident has stated that the area needs adequate parking and that the A259 should not become too congested. They also suggest that public amenities such as schools are provided, as well as public slipways and trailer parking.
- Horsham District Council have requested that due to the potential impacts on the local road network, noise and air quality, that they be kept informed of development proposals, along with West Sussex County Council (WSCC). Horsham District Council is also positive in terms of job creation.
- WSCC have advised as to the education infrastructure required and also refer to the Shoreham Harbour Transport Strategy, which will include some locations and measures that apply outside of Shoreham Harbour. In particular, they highlight the fact that the Strategy will include some measures that will form part of the Strategic Infrastructure Package for sites outside of the area.
- Southern Water has submitted detailed comments and state that local sewerage and water distribution need to be considered. They comment that new and/or improved local water mains and sewers will be required and they also refer to the use of

planning conditions and the fact that easements will be required. They state that they are supportive of an on-going partnership working with the Council.

#### *Retail*

- GVA supports Draft Policy 8 and in particular Character Area 7; suggest that the policy makes reference to the role of retail as a catalyst to unlocking development; that the policy should recognise the role of retail to meet existing and additional needs and state that it is critical that new retail provision is brought forward. They also state that new development is consistent with the objectives of the merging Local Plan and that the regeneration of Shoreham Harbour should not be delayed pending the JAAP. They also refer to the need to develop a holistic approach to development and integration of Shoreham Harbour and the Town Centre, given the objective of securing better linkages between the two.
- Barton Wilmore (on behalf of the Co-op) propose rewording to state that retail uses will not be supported (in line with the Sustainability Appraisal). They also state that it should be made clear that any retail application coming forward will be subject to the sequential and impact tests of Draft Policy 26.

#### *Relocation of Existing Businesses*

- Drivers Jonas Deloitte (on behalf of Cemex Ltd) does not consider the relocation option to be a viable option and instead, suggest that the Council safeguard the industrial nature of Shoreham sites, in particular the existing and viable uses in Basin Road North. They also have concerns over the adjacency of new residential uses with industrial uses and the need to mitigate noise impacts in line with Para 123 of the NPPF.
- EMR have highlighted the fact that the regeneration of this area is dependent on the relocation of existing businesses and the identification of these sites should be indicated in the Local Plan. They also object to any sensitive receptors such as housing near their site, as they are a metal recycling facility and highlight their important role in local waste recycling.

## **Part Three - Policies for Places**

### **Draft Policy 9: Lancing**

- Shoreham Airport Consultative Committee, Adur & Worthing Business Partnership and Ricardo UK Ltd support this policy.

### **Draft Policy 10: Sompting**

- There are no comments relating specifically to Draft Policy 10.

### **Draft Policy 11: Shoreham-by-Sea**

#### *General*

- Shoreham Airport Consultative Committee, Adur & Worthing Business Partnership, Ricardo UK Ltd and one resident specifically support this policy.

### *Town Centre Uses and Retail Development*

- Transition Town (Shoreham-by-Sea) has commented on Para 3.13 and the provision made for a large scale retail unit. They argue that it should specify the type of retail proposed and go on to raise concerns regarding the negative impact a large retail development will have on small businesses in the town centre. In particular, they argue that a new supermarket will present a serious threat to Co-op, which plays a more central 'anchor' role and if the Co-op site should no longer provide a food retail function, the benefits of a 'sequential' approach to siting supermarkets will be lost and will draw footfall to the edge of centre. They also state that the policies laid out in the Draft Plan do not go far enough to mitigate the negative impacts of large supermarket development in Shoreham, in particular the impact on traffic congestion, air quality standards and CO2 emissions. Transition Town (Shoreham-by-Sea) is concerned that scarce brownfield land will be used for an unnecessary supermarket and they suggest that the wording of the Local Plan should reflect much more strongly a commitment towards protecting small independent producers and traders from supermarket competition. They also comment that there are alternative ways of kick-starting the Shoreham Harbour Regeneration Scheme.
- Transition Town (Shoreham-by-Sea) go on to state that the Civic Centre can only be justified as being in the town centre as long as it maintains a civic function. This will no longer be the case once the plan is published, therefore the Town Centre boundary should hug commercial and civic functions as it does to the north, south, east and west.
- The 'Say No to New Supermarkets in Shoreham' group is against new large scale supermarket development in and around Shoreham town centre and they have concerns regarding the impact of such a development on local businesses.
- GVA state that the Local Plan fails to properly reflect conclusions of evidence base outlined in studies for both Adur and Shoreham Harbour and it fails to identify a range of suitable sites to meet the scale and type of retail, leisure, commercial and other main town centre uses in full. As a result, they suggest that the Council has failed to properly assess the need to expand the town centre to ensure there is a sufficient supply of suitable size, because this study identifies the scope for a range of convenience and comparison retail, yet there are likely to be other competing needs for town centre uses in area. They therefore argue that the Local Plan, as currently drafted, lacks a sound and up to date evidence base and cannot meet the requirements of the NPPF, in particular Para 23.
- GVA go on to argue that other parts of Plan need to be amended for the sake of consistency, to acknowledge the scope for retailing within Shoreham Harbour, as recognised by DTZ. They object to the identification of town centre sites in Draft Policy 11 on basis that these are not properly justified by the evidence base, as they are not adequately defined and there is no evidence to suggest that the Council has properly applied policies in the NPPF to consider suitability and availability of town centre sites to accommodate all identified town centre needs. They also argue in the case of the Civic Centre site (which is not within PSA), that the Council has failed to identify need or appropriate scale of convenience in this part of town centre and it has not demonstrated compliance with the sequential approach or demonstrated how such needs could be suitably and viably accommodated on this site. GVA go on to suggest that the Council has produced no evidence regarding the impact of a retail development on the town centre, or the suitability or viability of the Civic Centre site

to accommodate such development. They also comment that it is evident that the Council has failed to consider alternative sites which may be more viable, suitable and available, or whether there is need for more than one food store. They suggest that land immediately to south of Brighton Road has the potential to form part of a functional town centre and is fundamental to achieving the desired linkage between the town centre and harbour area. They therefore argue that the town centre boundary should be drawn more widely to include this key part of Shoreham's Waterfront. In summary, they argue that the Local Plan does not accord with NPPF in that it identifies a town centre boundary but fails to differentiate this boundary from a more tightly defined PSA.

- A resident has suggested that given the need for housing in Adur and proposals for a new retail area south of the A259, that the Civic Centre site should be redeveloped for residential use.
- Barton Wilmore (on behalf of the Co-op) object to this policy and argue that the Civic Centre is not part of the Town Centre in retail policy terms. They state that the NPPF is clear that Town Centre comprises the Primary Shopping Area (PSA) and therefore the Civic Centre site should be considered edge-of-centre for retail policy purposes. They state that the Council's retail study is now out of date and they also object to the lack of a defined PSA in the plan. They comment that the current retail study only identifies capacity for an additional 250 sqm of net convenience goods floorspace in Shoreham and the NPPF (Para 23; sixth bullet point) makes it clear that sites should be allocated to meet the scale and type of development needed in Town Centres. Therefore, they argue that given only limited capacity, a food store at the Civic Centre site cannot be justified.
- A resident has argued that the proposed Morrisons supermarket, in addition to supermarkets proposed at Parcellforce and the Civic Centre, will result in significantly more traffic on the High Street, and suggests that the Royal Coach site would be more appropriate for a supermarket.
- The Shoreham Society is concerned that the food retail proposed at the Civic Centre conflicts with proposed plans for Frosts/Minelco site and Parcellforce and there are concerns over the sustainability of shops in the town centre. They are also concerned that a heavy handed car parking scheme will annoy shoppers (and residents) and they will not use Shoreham shops.
- The Shoreham Society has stated that it is essential that the parking facilities at Pond Road are retained and they also suggest that Ropetackle North is suitable for a mixed-use development, potentially a hotel and additional car parking situated in this area to prevent cars going further into the town centre.

#### *Air Quality*

- Transition Town (Shoreham-by Sea) are concerned that the designation of the High Street on its own as an Air Quality Management Area (AQMA) does not go far enough and that data on air quality along the eastern stretch of A259 should be made available to ascertain the impact of addition developments in the area. They are also concerned that the likelihood of breaching quality standards due to increased traffic congestion does not appear to be fully addressed in the plan and that given the proposals for high density housing and existing skateboard facilities used by young people and children, the issue of air quality is crucial. They also

comment that more than any other type of development, supermarkets generate significant traffic churn.

### *Conservation and Heritage*

- A resident has suggested that in relation to Map 18, consideration be given to extending the Shoreham Conservation Area eastern boundary from Surry Street due south to the River Adur North Bank, to ensure that the town's vital heritage assets are protected, as the eastern gateway to the Shoreham Conservation Area is a key area for improvement and regeneration.
- English Heritage welcome the recognition of the historic fabric and character of Shoreham's centre and the commitment to protecting Shoreham's heritage in Para 3.14, although they note that it is the centre itself and not just the setting that provides much of Shoreham's character.
- West Sussex County Council (WSCC) have suggested that there is scope to refer to the views of the Harbour and River Adur, which can be obtained from the High Street through narrow lanes and that these are an important visual link from the High Street, therefore this historic link should not be severed by inappropriate development.

### **Draft Policy 12: Southwick and Fishersgate**

- Ricardo UK Ltd, Adur & Worthing Business Partnership and the Shoreham Airport Consultative Committee support this policy.
- Southview Area Residents Association have suggested that A4 (drinking establishments) and A5 (hot food takeaways) uses be excluded from this policy, because there are already two such premises in the square. They also make reference to Paras 3.28-3.32 and raise concerns with regards to flood risk and are concerned that there is no mention of flood risks which prevail in Southwick and would seriously impact on future development in the area.

### **Draft Policy 13: Adur's Countryside**

- Shoreham Airport Consultative Committee, Adur & Worthing Business Partnership and the Southview Area Residents Association support this policy as does the South Downs Society. English Heritage supports the reference to historic character in Para 3.35. Strutt & Parker (on behalf of Hillreed Homes) support the text in Para 3.36, although they also state that any development within the gaps would lead to coalescence, therefore the word 'coalescence' should be removed.
- Natural England supports the references to green infrastructure and protection of landscape character. Would like to see policy amended to ensure biodiversity is protected, conserved, and where possible enhanced, within the discussion on green infrastructure.
- The South Downs National Park Authority have suggested that reference should be made in the text to the SDNP's statutory purposes and duty and also the percentage of Adur that is located in the National Park. West Sussex County Council (WSCC) suggests that Adur District Council work with WSCC as well as the SDNPA to improve access.

- Cobbetts Developments have requested that Lancing Green Gap be redefined to release small quantities of land around its periphery and remaining gap strengthened to secure its long term future. They suggest that the gap boundary be redefined using the strongest physical features, such as the A27, River Adur and railway to the south.
- Paul Carter Planning (representing Landstone Ltd, Taylor Wimpey Ltd, Mr Jeffries and Mr Goble) has proposed that playing fields and informal open space be permitted in areas of countryside.

## **Part Four – Development Management Policies**

### **Draft Policy 14: Quality of the Built Environment and Public Realm**

- Adur & Worthing Business Partnership, Shoreham Airport Consultative Committee, Ricardo UK Ltd, South Downs Society, English Heritage, Southdown Area Residential Association and the Shoreham Society support this policy. In particular, the Shoreham Society is pleased that design codes, planning briefs and masterplans will be developed for key sites.
- Natural England welcome inclusion of requirements that development should respect natural features of a site, and would like to see a requirement for development to contribute positively to biodiversity and the provision of green space as part of a green infrastructure network.

### **Draft Policy 15: A Strategic Approach to the Historic Environment**

- South Downs Society, Ricardo UK Ltd and Southview Area Residents Association all support this policy. The Shoreham Society have requested that the Council be vigilant and have stated that they agree with the majority of DP 15. West Sussex County Council (WSCC) has provided a number of comments, which refer to the Historic Environment Records, archaeology and strategic sites and they stress the need for assessments.
- English Heritage has made detailed comments on this policy and refers to the need to mention non-designated heritage assets and to explain the evidence base more clearly. They also suggest defining ‘compelling circumstances’, as outlined in the NPPF. Overall, they consider that the Draft Local Plan, with Visions, Objectives, Draft Policies and textual references fundamentally satisfies the requirement for a positive strategy for the historic environment, as required by the NPPF.

### **Draft Policy 16: The Historic Environment**

- South Downs Society, Ricardo UK Ltd and Southview Area Residents Association support this policy. The Shoreham Society have requested that the Council be vigilant and have stated that they agree with the majority of DP 16. The South Downs National Park Authority (SDNPA) has requested that reference be made to the historic environment of the National Park, particularly the setting of Lancing College.
- English Heritage has made detailed comments on this policy and recommend revised wording for DP 16. Overall, they consider that the Draft Local Plan, with Visions, Objectives, Draft Policies and textual references fundamentally satisfies the



requirement for a positive strategy for the historic environment, as required by the NPPF.

#### **Draft Policy 17: The Energy Hierarchy**

- Southview Area Residents Association, Adur & Worthing Business Partnership, Shoreham Airport Consultative Committee and Ricardo UK Ltd all support this policy.
- A resident has stated that the policy should be far more demanding for developers and is concerned that the policy is currently no more than standard procedure.

#### **Draft Policy 18: Sustainable Design**

- Ricardo UK Ltd, Southview Area Residents Association, Shoreham Airport Consultative Committee, Southern Water, and the Adur & Worthing Business Partnership support this policy. The Environment Agency also supports this policy but suggests that specific reference be made to water efficiency.
- A resident has requested that the CSH level 5 should be used as a minimum and another resident has stated that although it may cost more to build, it is cheaper to run using less resources.
- The Shoreham Society have questioned whether any action will be taken if developers do not supply BREEAM certification evidence and asked what constitutes 'good thermal performance'.

#### **Draft Policy 19: Decentralised Energy and Standalone Energy Schemes**

- The Southview Area Residents Association, Adur & Worthing Business Partnership, Shoreham Airport Consultative Committee and Ricardo UK Ltd all support this policy.

#### **Draft Policy 20: Housing Mix and Quality**

- Ricardo UK Ltd and the Shoreham Society both support this policy.
- The Planning Bureau Ltd has requested that a new policy be added to address older persons' housing, rather than including it here.
- Southview Area Residents Association has a specific concern in relation to the conversion of dwellings to flats and requests a caveat restricting the number of conversions allowed in one road.
- A resident was concerned that there was no reference to tower blocks.

#### **Draft Policy 21: Principles for an Affordable Housing Policy**

- Strutt & Parker (on behalf of Hillreed Homes) are supportive of this policy. St Mungo Community Housing Association refers to the need to plan positively for social housing which is affordable.
- A resident has required that consideration be given to the impact that this large number of affordable homes would have on the district as a whole. Another resident has stated that there should be a requirement to mix the affordable housing with the remaining development.

#### **Draft Policy 22: Density**

- There are no comments related directly to Draft Policy 22.

#### **Draft Policy 23: Provision for Gypsies, Travellers and Travelling Showpeople**

- A resident has supported the overall policy and the South Downs Society supports Para 4.54.
- The Environment Agency has suggested that additional criteria be added to ensure that no development is proposed within Flood Zone 3.
- The St Mungo Community Housing Association is concerned that more transit provision is needed.

#### **Draft Policy 24: Protecting and Enhancing Existing Employment Sites and Premises**

- Ricardo UK Ltd, Adur & Worthing Business Partnership and the Shoreham Airport Consultative Committee support this policy and the Coastal West Sussex Partnership (CWSP) supports the three new employment site development opportunities proposed. However, CWSP state that it is also equally important to protect existing business parks such as Lancing Business Park and suggests that more be done to strengthen the requirement to protect and enhance them.
- The 'Say No to New Supermarkets in Shoreham' group object to the provision of large scale retail in the area.

#### **Draft Policy 25: The Visitor Economy**

- The Adur & Worthing Business Partnership, Ricardo UK Ltd and Shoreham Airport Consultative Committee support this policy. The South Downs Society also support this policy and enhanced access to the National Park.
- A resident also supports this policy and states that the district needs a hotel.
- Another resident has raised concerns regarding monitoring the impact on the environment in relation to proposed development at Shoreham Harbour.

#### **Draft Policy 26: Retail, Town Centres and Local Parades**

- Ricardo UK Ltd, Adur & Worthing Business Partnership and the Shoreham Airport Consultative Committee all support this policy.
- A resident has highlighted that the plan does not recognise the pressure for retail development and that no strategy has been put forward to deal with proposals in a coordinated way.
- GVA are concerned that the Local Plan is unsound as currently drafted; in as far as the town centre boundary extends well beyond any proper definition of a Primary Shopping Area (PSA). They suggest that the PSA be clarified and should relate to the defined primary and secondary frontages and that the wider town centre boundary should be extended to include the Western Harbour.

- Barton Wilmore (on behalf of Co-op) have requested that the policy clarifies that applications for retail development will be assessed against the NPPF sequential and impact tests (Para 24 & 26) and determined in accordance with Para 27. They also suggest that the policy should clarify that for retail development, the Town Centre comprises the PSA.
- The Theatres Trust has suggested that Para 4.66 should not merely state that town centre uses are defined in the NPPF, but should actually be advised in the document for clarity. They also state that the draft policy only deals with retail matters at present, but should also contain guidance for town centre uses as recommended in the NPPF (Para 23) with regards to the vitality of town centres. They suggest that the policy should acknowledge all its town centre uses other than retail and provide for their protection and enhancement.
- Natural England welcomes references to the use of pedestrian facilities linking areas; this should also support improvements to public access to the coast, including new links (such as the Monarch's Way National Trail).

#### **Draft Policy 27: Transport and Accessibility**

- Shoreham Airport Consultative Committee, Adur & Worthing Business Partnership, Ricardo UK Ltd and Southview Area Residential Association all support this policy. Brighton & Hove City Council supports setting those measures identified in Para 4.76 to reduce the negative effects on amenity and air pollution.
- Natural England would like to see green infrastructure included in the definition of infrastructure in this policy, and an explicit link to Policy 28.
- The Highways Agency is looking forward to continuing joint working relating to mitigation and suggests adding a reference about appropriate mitigation to the A27.
- The South Downs Society has requested the need to recognise the National Park landscape, particularly if the A27 is modified.

#### *Traffic Congestion*

- Four residents had concerns about existing traffic congestion, in particular; adding to traffic when junctions are already at capacity and there are parking problems; that current road works result in lengthy tailbacks; public transport is expensive and that although encouraging its use is admirable, it may never be practical, and it shouldn't be assumed that this is a solution to traffic congestion problems; and that the plan does not offer solutions regarding traffic and public transport.

#### **Draft Policy 28: Delivering Infrastructure**

- The Southview Area Residents Association and Ricardo UK Ltd support this policy. Southern Water also supports the policy, but recommends that a new policy is introduced to address the delivery of utility infrastructure.
- Strutt & Parker (on behalf of Hillreed Homes) supports the policy but states that it is difficult to respond, because the Infrastructure Delivery Plan (IDP) is not currently available. Hillreed Homes are not convinced that a policy which sets out an intention to develop a Community Infrastructure Levy (CIL) is relevant for a Local Plan and suggest that detailed drafting should be undertaken in light of a Draft IDP. The

Highways Agency has stated that they would like to input into CIL and the IDP in due course. West Sussex County Council (WSCC) has stated that the IDP needs to include requirements to deliver WSCC services and that Country Local Committees (CLC) work will inform local priorities.

- Shoreham Airport Consultative Committee, Ricardo UK Ltd and Adur & Worthing Business Partnership have suggested that CIL should only be used where it does not impact on the viability of a development.
- The Theatre Trust is concerned that this policy does not reflect the NPPF's recommendations in terms of strategic policies to deliver health, social and community infrastructure etc.

### **Draft Policy 29: Green Infrastructure and Open Space**

- The Shoreham Airport Consultative Committee, Adur & Worthing Business Partnership, South Downs Society, Strutt & Parker (on behalf of Hillreed Homes), and Ricardo UK Ltd all support this policy.
- The Environment Agency are generally supportive of this policy, however they feel that further emphasis on the importance of conserving and enhancing biodiversity is required. They would expect a requirement for developers to protect and, where possible, enhance biodiversity, including National and Local designated sites, as well as Biodiversity Action Plan (BAP) habitats and species.
- Natural England welcomes the inclusion of this policy in the Local Plan, and the commitment to prepare both a Green Infrastructure Strategy and a Green Infrastructure and Open Space Supplementary Planning Document. However, they state that the policy needs strengthening clearly stating that all development proposals should ensure the protection, conservation and where possible enhancement of biodiversity, including nationally and locally designated wildlife sites, habitat areas, wildlife corridors and protected and priority species. Additional wording should be drafted within this policy which more fully reflects paragraphs 109 – 118 of the NPPF. In particular they consider that the policy requires stronger protection for SSSIs in the district (notably the Adur Estuary SSSI) in accordance with the NPPF, to ensure that proposed development likely to have an adverse effect on an SSSI is not normally be permitted.
- Natural England go on to state that the policy should refer to the role of green infrastructure in planning for climate change adaptation, including to allow habitats to adapt and species to move along habitat corridors, and that the Local Plan should include a commitment to identify and map a coherent ecological network that will be more resilient to current and future pressures, as part of the green infrastructure network identified in the future GI Strategy and SPD. The Local Plan should also identify any Biodiversity Opportunity Areas in the district, as referred to in the Draft Local Plan's Sustainability Appraisal and Strategic Environmental Assessment report, and links to the nearby South Downs Nature Improvement Area. Natural England recommend the use of the Access to Natural Greenspace Standard (ANGSt) as a useful tool that can help ensure adequate provision of accessible natural greenspace, in the preparation of the SPD and GI Strategy documents.
- Cobbetts Developments have suggested that Lancing Green Gap be redefined to release small quantities of land around its periphery and the remaining gap strengthened to secure its future long term. They also suggest that the gap boundary

should be redefined using the strongest physical features, such as the A27, River Adur and railway to the south.

- West Sussex County Council (WSCC) has suggested that Green Infrastructure forms part of the Infrastructure Delivery Plan (IDP). They also comment that there are a number of Sites of Nature Conservation Importance (SNCIs) within the Local Plan area, therefore policies should seek to protect and enhance their nature conservation value. They have also suggested that Regionally Important Geological and Geomorphological Sites (RIGGS), could also be depicted on Map 24, as there are two in Adur (although both in SDNP). An error on Map 24 has also been noticed, where SNCI 2 and 3 are labelled the wrong way round.
- Southern Water has stated that it is important that policies do not restrict the provision of essential water supply and wastewater infrastructure and that the policy should recognise that essential utility development will be permitted if the benefit outweighs the harm and there is no reasonable alternative available. Southern Water also suggests an amendment to the wording of the policy.
- A resident has suggested that Section 106 monies be used to enforce this policy, instead of providing generic football pitches or playgrounds, and has stated that there could be a real opportunity around the Mash Barn area, as it has biodiversity interest, but there is currently no access. Proper access would enhance the area and encourage local people to enjoy their area more.

#### **Draft Policy 30: Planning for Healthy Communities**

- A resident has stated that a new community hospital facility is required within the district and this is identified in the Local Primary Care Trust Plan.

#### **Draft Policy 31: Pollution and Contamination**

- The Adur & Worthing Business Partnership, Shoreham Airport Consultative Committee, Ricardo UK Ltd and Barton Wilmore LLP (on behalf of Edgeley Green Power Ltd) all support this policy.
- Southern Water supports the principles of this policy, but would like to see it elaborated to protect water resources used for public water supplies. They suggest that a stronger policy provision is required to protect amenity of new development if proposals come forward adjacent to existing wastewater treatment works, or smaller wastewater facilities such as pumping stations and have proposed additional text. They reiterate that development should not be allocated on Source Protection Zones unless mitigation measures are provided to the satisfaction of the Environment Agency.
- West Sussex County Council (WSCC) has suggested that there should be further detail linking noise pollution to traffic. They have stated that reference should be made to Brighton Noise Action Plan (DEFRA 2010), as a number of dwellings in Adur are located in 'First Priority Locations'. They suggest that Adur District Council and the Highways Authority work together on mitigation measures that can reduce the number of dwellings affected by road noise and also monitor dwellings affected by noise and air pollution.
- The Environment Agency (EA) welcomes paras 4.103 to 4.107. However, they are concerned that there is no reference to groundwater, as the Chalk Downs form an

important feature within the district and are a major source of drinking water for the area. Groundwater protection is therefore essential and they recommend the policy be updated to reflect this. The EA also suggest that the policy be strengthened in related to the protection of water and that it should include specific reference to the impacts from contamination on controlled waters and the need to submit a preliminary risk assessment.

- Brighton & Hove City Council (BHCC) have stated that the acknowledgement of Air Quality Monitoring Areas (AQMA) located in Brighton is welcomed and that the effect on these should be considered. Furthermore, Brighton & Hove's AQMA immediately border Adur and any proposals that could alter traffic flow should bear in mind the potential impacts on these AQMAs.

### **Draft Policy 32: Flood Risk and Sustainable Drainage**

- The Shoreham Airport Consultative Committee, Ricardo UK Ltd and a resident all support this policy.
- The Environment Agency also supports this policy and states that it is well worded. However, with reference to SuDS, they have requested that the word 'Greenfield' be removed from the policy to include all sites and have suggested some policy wording. They have also stated that it might be useful to split the policy into separate flood risk and water policies, in order to achieve the requirements of the Water Framework Directive, by protecting and enhancing water quality and quantity of groundwater and surface water features. This would help to strengthen plan relation to water quality.

#### *Future development*

- Cobbetts Developments have requested that the Local Plan be amended to prohibit further development in functional floodplains, before the implementation of enhancements to River Adur flood defences on the eastern side.
- A resident has concerns that flood defence is not as good as flood resistance. They have suggested that Hasler and New Monks Farm sites should have living accommodation on first floor and garages and utility uses on the ground floor. They have also suggested that lakes and streams could provide a high quality environment.

### **Draft Policy 33: Telecommunications**

- Southview Area Residents Association, Adur & Worthing Business Partnership and Shoreham Airport Consultative Committee, all support this policy.

## **Part Five – Appendices**

### **Appendix 1: Proposed Amendments to Built Up Area Boundary – Map 25**

- Five residents supported the amendments made to Map 25 and another resident has supported Map 25, Amendment No. 5. In particular, one resident supported the proposal for the inclusion of Firle Road in the Built Up Area Boundary (BUAB) and stated that it can satisfy the needs of company executives (housing mix).

- Strutt and Parker (on behalf of Hillreed Homes), supported Amendments No. 1 and 2.
- Blue Sky Planning has suggested that a further site east of Adur Close, Lancing be included in the amendments.

## **Appendix 2: Local Parades – Maps**

- Barton Wilmore (on behalf of Co-op) supports the town centre boundaries for Shoreham-by-Sea and Southwick, but has objected to the town centre boundary for Lancing, as the map shows the Co-op to be outside of this boundary.

## **Appendix 3: Duty to Co-operate**

- There are no comments related directly to Appendix 3 (Please see also comments made in relation to Duty to Co-operate section, page 2 of Draft Adur Local Plan).

## **Appendix 4: Delivery and Implementation**

- There are no comments related directly to Appendix 4.

## **Appendix 5: Monitoring**

- Natural England has proposed some amendments in relation to biodiversity indicators and green infrastructure.

## **Appendix 6: Saved Policies**

- There are no comments related directly to Appendix 6.

## **Appendix 7: Delivering the Vision: Relationship between Vision and Objectives and Policies**

- There are no comments related directly to Appendix 7.

## **Appendix 8: Glossary**

- English Heritage and West Sussex County Council have suggested that several additions and amendments are made to the Glossary, with particular reference to historic environment matters

## **Sustainability Appraisal of Draft Adur Local Plan 2013**

Enplan (on behalf of New Monks Farm Developments Ltd) made the following comments in terms of the assessments made in the Sustainability Appraisal (SA) for Options A and B:

- Do not agree that development at NMF will be relatively prominent within the Local Green Gap. The Urban Fringe Study 2006 states that this area contributes at a level of medium – low towards the strategic gap and to the overall landscape. It also states that given existing development to the north, the western part of the site contributes little to the overall integrity of the strategic gap north to south. NMF is adjacent to the built up area of Lancing and the Brighton & Hove Albion Training Ground development, which has recently been granted planning approval, will result in the built up area boundary being extended significantly to the east. In addition, there will

be a robust landscaping scheme included as part of the NMF development proposals and a good defensible boundary to the Local Green Gap in the form of the golf course and open space between the site and the airport will remain (it is the intention of the land owner to include within a legal agreement, a clause that will facilitate the redesigning of the golf course thus protecting its green status in perpetuity).

- NMF must be assessed independently from the other residential greenfield sites. For example, many of the options have scored an amber rating against the Sustainability Objectives (SO) but if NMF was assessed independently, it would have likely scored a green rating due to its ability to provide a mixed use development (reducing the need to travel), providing new open space and community facilities. Conversely, when assessed under the Objective to reduce poverty, social exclusion and social inequalities, the score across all options is Green. In reality it is only NMF that is referenced as being able to achieve this objective. Where any of the Options have scored green against the SO, this has been due to the positive impacts of NMF rather than the other sites. All sites must be independently sustainable and cannot be afforded the luxury of 'piggybacking' on NMF's sustainability credentials and ability to mitigate impacts such as traffic generation and flood risk etc.
- Do not agree that a housing provision of 600 units at NMF could result in less community facilities and employment floorspace to the detriment of its regeneration credentials. There is no evidence to support this statement and more detailed masterplanning is being undertaken currently in relation to layouts and densities etc. that will prove this to be the case.
- Do not agree with the SA conclusion on the options. We do not consider Option B provides a risk to environmental issues that out-weigh those of economic and social concern. For NMF, any environmental impacts can be effectively mitigated. Social and economic regeneration is required within Adur. In addition, we do not understand how SO 20 – raising educational achievement and skills has been omitted from the assessment on the housing options when it is likely NMF will accommodate a site for a new school and training facilities for local people. The school to be located on NMF will have a wider catchment area than just the site because of the impact of other housing sites on the existing school provision. NMF on its own does not generate the requirement for a new school.
- Appendix 3 to the SA on site appraisals contains a red score for NMF under several categories. We do not agree that the proposed development will have a significant impact/conflict with the South Downs National Park. This should be graded as Amber without clear evidence or substantiation of the facts being presented. Whilst the site is in close proximity to existing schools, no reference is given to it providing a site for a new school. If reference to this were included this would undoubtedly have a positive impact on this assessment.

Paul T Carter planning (representing Landstone Ltd, Taylor Wimpey Ltd, Mr B Jeffries, Mr M Goble) made the following comments:

- The conclusion in the Sustainability Appraisal (SA) and the Strategic Environmental Assessment (SEA) of the Draft Adur Local Plan page 172, that there is some potential for conflict with sustainability objective 5 is not accepted. The nearest part of this site is 0.14km from the Listed Building.

West Sussex County Council made the following comments:



- Page 13: Biodiversity Opportunity Areas (BOAs) deserve a mention as a local initiative which drives local biodiversity delivery.
- Map 24 (also on page 22 of the Sustainability Appraisal): Site 2 is in fact Applesham Farm Bank SNCI and Site 3 is in fact Steep Down, Lancing SNCI. Regionally Important Geological & Geomorphological Sites (RIGGS) could also be depicted on this plan. It is understood that there are two RIGGS in Adur District (although both within the SDNPA): Gaster Pit 7 & Hill Barn Pit, North Lancing.

Brighton & Hove City Council made the following comments:

- **Section 3** - Some of the baseline data could be updated with more recent and accurate figures. Some other statistics in Section 3 are undated, making it difficult to know whether the figures are the most recent.
- **Assessments** - The assessments appear to have been thoroughly carried out and provide good analysis of whether the effects are likely to be positive or negative, as required by the SEA Directive. However, other requirements of the SEA Directive Annex 1, paragraph (f), footnote 1, do not appear to have been considered, with the exception of Cumulative Impacts. E.g. the assessment of timescale, permanence or secondary impacts.
- **Consultation findings** - There is no indication or summary of the consultation responses that were received for the previous stage of the SA, and how these have been considered. Will this be included in the Consultation Statement?

Natural England made the following comments regarding the key indicators identified for draft policy 29 “Green Infrastructure and Open Space”:

- Still consider that the indicators do not provide a complete picture.
- Would hope that number of developments within designated wildlife sites and reserves remains at 0 and therefore this is not one of the most appropriate measures, although it can be retained.
- Extent and condition of SSSIs (and other designated sites, LNRs, SNCIs) could be added as an indicator, and it is noted that the Adur Estuary SSSI currently has a 100% favourable condition.
- Also suggest a more “positive” indicator around the creation of Biodiversity Action Plan (BAP) habitat, including habitat creation through development which should be required by planning condition. This would require data to be collected by the Council as well as the Sussex Biodiversity Partnership.
- The amount and types of land defined as being part of the Green Infrastructure network including the ecological framework, to be described in the Green Infrastructure Strategy, should also be reported as an indicator.

The amount of land under environmental stewardship schemes could also be used as an indicator.

