

**PROPOSED SUBMISSION ADUR
LOCAL PLAN 2014 PUBLICATION
CONSULTATION
(OCT – DEC 2014)**

**SUMMARY OF
REPRESENTATIONS RECEIVED**

November 2015



Contents

1.	Introduction	Pg. 3
2.	Proposed Submission Adur Local Plan 2014 Publication Consultation	Pg. 4
3.	Representations Received	Pg. 6
4.	Representation Summaries	Pg. 7

1. Introduction

1.1 Adur District Council has prepared a plan that will, once adopted provide a strategy for development in Adur (excluding the area covered by the National Park) up to 2031. This document is known as the Adur Local Plan 2014 and will be the 'umbrella' for all subsequent policy and guidance documents to be produced as part of the Local Development Framework (LDF).

1.2 This report provides a summary of the 6 week publication period for the Proposed Submission Adur Local Plan which took place from Monday 20 October to 5pm on Monday 1 December 2014, under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

1.3 Section 2 of this report sets out the methodology for the Proposed Submission Adur Local Plan publication period, in terms of who was notified, how the document was made available, publicity that took place, etc. Section 3 provides an overview of the representations received and Section 4 summarises the main issues of the representations received for each policy/section.

2. Proposed Submission Adur Local Plan 2014 Publication Consultation

2.1 In accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Adur & Worthing Statement of Community Involvement (2012), the Council published the Proposed Submission Adur Local Plan on 20th October 2014 for a six week consultation period.

2.2 The Proposed Submission Adur Local Plan 2014 sets a vision for Adur up to 2031. It contains strategic planning policies to deliver new homes, jobs and infrastructure. These policies and principles will shape the future of the area and will be used in the consideration of planning applications. The Plan covers that part of Adur District which lies outside the South Downs National Park.

2.3 This version of the Plan included a revised housing provision target of 3488-3638 dwellings between 2011-2031 representing an increase from the Revised Draft Adur Local Plan 2013, due to an increased number of dwellings completed and sites where planning permission has been granted. The allocations at New Monks Farm and land at West Sompting remain unchanged in terms of the level of housing proposed.

2.4 At the time of publication the Council intended to submit this version of the Local Plan to the Secretary of State for Communities and Local Government. Therefore representations were invited relating to the tests of soundness in accordance with the Regulations.

2.5 The following documents were made available on the Council's website along with response forms and guidance on how to make a representation:

- Proposed Submission Adur Local Plan 2014 (including Appendices, Policies Map and Inset Map)
- Background Evidence Document
- Sustainability Appraisal
- Habitat Regulations Assessment (HRA) Screening Opinion and Addendum
- Sequential and Exception Test
- Housing Implementation Strategy 2014
- Adur Strategic Housing Land Availability Assessment 2014 (SHLAA)
- Adur Duty to Co-operate Statement 2014
- Adur Equalities and Health Impact Assessment 2014
- Infrastructure Delivery Plan 2014
- Whole Plan Viability Study
- Evidence studies
- Statement of Representation Procedures
- Statement of Consultation 2014
- Frequently asked questions

2.6 In order to reach the wider public, paper copies of the Proposed Submission Adur Local Plan 2014, the Policies Map, response forms and supporting documents were made available at the Council's offices in Shoreham-by-Sea, on its website,

and at the three District libraries. Reference copies were also placed at Sompting Parish Council and Lancing Parish Council.

2.7 The contact details for specific and general consultation bodies are kept in Adur District Council's Local Development Framework consultation database. In addition to these bodies, the Council holds details of members of the public and local groups/organisations who have either asked to be kept informed of progress on the Local Plan or have previously made representations on consultation documents. At the time of the Publication of the Proposed Submission Adur Local Plan 2014 this database contained approximately 1800 names and addresses, all of which were sent a letter via email or post informing them of the Publication. The Councils' Twitter and Facebook pages were also used to publicise the Plan.

3. Representations Received

3.1 A total of 42 responses were received from a variety of stakeholders including organisations, businesses and residents on the Local Plan. These can be viewed in full on the Council's website <http://www.adur-worthing.gov.uk/adur-local-plan-2014/>

3.2 This included responses from the following specific consultation bodies:

Arun District Council	Brighton and Hove City Council
East Sussex County Council	Environment Agency
Highways Agency	Marine Management Organisation
Mid Sussex District Council	NHS Property Services
Natural England	South Downs National Park Authority
Southern Water	West Sussex County Council
Worthing Borough Council	

3.3 The following section summarises the main issues raised by the representations.

4. Representation Summaries

Part One – The Adur Local Plan
The Duty to Co-operate <ul style="list-style-type: none">• Neighbouring Local Authorities highlight that constructive discussions and joint work has taken place.
Vision and Objectives of the Adur Local Plan <ul style="list-style-type: none">• Site promoters consider objective 1 unsound as it does not seek to meet the full objectively assessed housing need.
Part Two – A Strategy for Change and Prosperity
Policy 2: Spatial Strategy <ul style="list-style-type: none">• Site promoters consider that insufficient sites have been taken forward by the Council to meet identified need and that the sixth paragraph resisting development that would result in coalescence or loss of identity of settlements should be deleted.• Campaign to Protect Rural England (CPRE) does not consider the allocation of greenfield sites sustainable.
Policy 3: Housing Provision <ul style="list-style-type: none">• Site promoters highlight that the Local Plan fails to meet objectively assessed housing need and therefore alternative sites should also be allocated for development.• The Home Builders Federation (HBF) raise concerns that the housing requirement is unjustified.• Sussex Wildlife Trust (SWT) questions the suitability of the increase in housing numbers from the draft plan given the pressure on the natural environment.
Policy 4: Planning for Economic Growth <ul style="list-style-type: none">• The landowner maintains that the allocation of only 15,000sqm at Shoreham Airport is unviable and should be amended to 30,000sqm to overcome this.• Landowners of alternative sites have stated that the Shoreham Airport allocation should be removed or significantly reduced and reoriented to protect the gap between Lancing and Shoreham west of the River Adur.
Policy 5: New Monks Farm, Lancing <ul style="list-style-type: none">• Site promoters do not consider the indicative location of the roundabout to serve Policy 6 and 7 allocations, is the most appropriate when considered against alternatives.• Lancing College have raised concerns that access should remain in both directions to and from the A27 to provide pedestrian, cycle and equestrian access to the South Downs National Park.• Ricardo has responded that they would want to see an agreed location of the A27 junction as far east as is possible.• Site promoters do not consider that the proposed built up area boundary alteration east of Lancing is the most appropriate when considered against

alternatives. They recommend an amendment to the proposed built up area boundary to enable 600 homes to be delivered.

- Site promoters state that significant B1 space would only be viable on the site with direct access from the A27.
- Local residents and CPRE have raised concerns that major development in the Lancing gap will increase flood risk locally from a variety of sources.
- West Sussex County Council (WSCC) has reviewed the submitted evidence and can find no reason why the sites would not meet the Sequential and Exceptions Tests.
- Sport England advises that the requirement for open space and recreation areas and provision for formal sports are not based on robust evidence.

Policy 6: West Sompting

- WSCC recommends wording be added to Policy 6 to ensure access across the A27 for pedestrians, cyclists and equestrians is retained and where possible enhanced.
- Local residents and the Parish Council raise concerns about increased traffic congestion and the impact of further traffic calming measures on local air quality.
- Sport England advises that the requirement for open space and recreation areas and provision for formal sports are not based on robust evidence.
- The Environment Agency (EA) considers this site has the lowest flood risk of the proposed allocations and welcomes the opportunities to deliver ecological enhancements.
- SWT considers this allocation further erodes the green gaps between Worthing and Sompting. However welcomes the biodiversity enhancements suggested and the potential for local people to use the green gap.

Policy 7: Shoreham Airport

- The Shoreham and District Ornithological Society highlights that development in the north eastern corner is the worst location in terms of over wintering birds and impacts on ecology.
- Local residents have raised concerns that development here would impact on views across the airport.
- Brighton City (Shoreham) Airport considers the allocation undeliverable due to costs associated with funding a proportion of the roundabout. Recommends allocating 30,000sqm of employment space and moving the proposed roundabout junction near the boundaries of the Airport and NMF to overcome this.
- Local residents and CPRE are concerned that further development in the floodplain (flood zones 3a/3b) will put the local community at even greater risk of flooding. The outcomes of the CH2MHILL Lancing Surface Water Management Plan should be known before progressing with the Local Plan.
- Brighton City (Shoreham) Airport and Lancing College considers east west access on both sides of the proposed junction is essential.
- Brighton and Hove City Council (BHCC) as the joint freeholder has highlighted that development of the north east corner should not jeopardise the runway use and airport operations.

Policy 8: Shoreham Harbour Regeneration Area

- WSCC highlight that a further primary school may be required as part of this allocation and recommend this should be made clear.
- The EA supports reference to high environmental standards and the need for ecological enhancements and flood defences along the Western Harbour Arm. Recommends additional criteria is included on land contamination given the historic uses.
- Port operators highlighted importance of ensuring development does not compromise the operations of businesses.
- Sport England would not support the loss of the playing field.
- East Sussex County Council (ESCC) considers it important to maintain capacity for aggregate imports.
- SWT support ecological enhancements but should also recognise the potential increase in visitor pressure on sites such as Wide Water Lagoon LNR and Shoreham Beach LNR.

Part Three – Policies for Places

Policy 12: Southwick and Fishersgate

- BHCC welcome recognition of the site known as Eastbrook allotments as having potential for mixed use development.

Policy 13: Adur’s Countryside and Coast

- Site promoters consider Policy 13 to be a blanket protection to all areas outside the built up areas. Dos not consider there to be any justification in landscape terms, protection of settlement identity that supports this approach.

Policy 14: Local Green Gaps

- Site promoters consider there is no justification for designating the same land with two restrictive designations. The policy is not justified or positive. The area covered by this policy is the same as that under policy 13.

Part Four – Development Management Policies

Policy 15: Quality of the Built Environment and Public Realm

- SWT welcomes the inclusion of natural features and biodiversity within this Policy.

Policy 17: The Historic Environment

- WSCC welcome references to the historic environment. Recommends reference within Policy 17 to Scheduled Ancient Monuments and that heritage asset are also shown on the Policies Map.

Policy 18: The Energy Hierarchy

- HBF considers this policy unsound as how applicants adhere to energy hierarchy, achieve energy efficiency standards or incorporate renewable energy measures is no longer a planning matter but a matter for Building Control.

Policy 19: Sustainable Design

- The EA supports the intention to seek the higher level of water efficiency and

<p>recommends that this figure is specifically referred to in the policy text.</p> <ul style="list-style-type: none"> • HBF considers this policy inconsistent with Government policy and unjustified in terms of viability.
<p>Policy 20: Decentralised Energy and Standalone Energy Schemes</p> <ul style="list-style-type: none"> • HBF considers this policy contrary to stated government policy on energy in residential development.
<p>Policy 21: Housing Mix and Quality</p> <ul style="list-style-type: none"> • HBF highlights that it is unclear from the viability assessment whether the requirement for Lifetime Homes has been included as a policy cost.
<p>Policy 22: Affordable Housing</p> <ul style="list-style-type: none"> • HBF considers the rates for affordable housing are unsound because they are unjustified as are not supported by the evidence.
<p>Policy 24: Provision for Gypsies, Travellers and Travelling Showpeople</p> <ul style="list-style-type: none"> • The EA support the inclusion of this Policy but recommend amendments to ensure compliance with the NPPF.
<p>Policy 26: Protecting and Enhancing Existing Employment Sites and Premises</p> <ul style="list-style-type: none"> • Site promoters consider that as drafted the policy provides no flexibility to adapt to potential changes in the economy or the needs of existing businesses. The policy fails to recognise that non B class uses can have employment generating benefits.
<p>Policy 29: Transport and Connectivity</p> <ul style="list-style-type: none"> • The HBF highlights that this policy does not specify what the most up to date parking standards are.
<p>Policy 30: Delivering Infrastructure</p> <ul style="list-style-type: none"> • HBF consider it is unclear how the assumption in the Viability Assessment that development will contribute just £1000 per dwelling will support the requirements of its Infrastructure Plan.
<p>Policy 33: Open Space, Recreation and Leisure</p> <ul style="list-style-type: none"> • Sport England does not consider this Policy to be in accordance with paragraph 74 of the NPPF.