

# AMENDMENTS TO PROPOSED SUBMISSION ADUR LOCAL PLAN (2016)

## STATEMENT OF CONSULTATION

March 2016



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# 1. Introduction

1.1 The Town and Country Planning (Local Planning) (England) Regulations 2012 set out the documents that must be submitted with the Local Plan to the Secretary of State. One of these documents is a statement setting out:

- which bodies and persons were invited to make representations under Regulations 18 and 20 (of the Regulations referred to above);
- how those bodies and persons were invited to make such representations;
- a summary of the main issues raised by those representations, and
- how those main issues have been addressed in the development plan document.

1.2 This Statement of Consultation fulfils that role. It explains what consultation has been carried out at each key stage in the Adur Local Plan's preparation, how it has been done, who has been involved, the results of each consultation stage and how these have influenced the final document. (It should also be noted that the Local Plan needs to comply with legislation, planning policy and guidance, and have regard to the Council's evidence base).

1.3 The key stages of consultation covered by this Statement are as follows:

Stakeholder Issues and Options	June – July 2010
Adur Housing and Employment Options	27 June – 7 August 2011
Draft Adur Local Plan	19 September – 31 October 2012
Revised Draft Adur Local Plan	26 September – 7 November 2013 *
Proposed Submission Adur Local Plan	20 October – 1 December 2014
Proposed Amendments to the Proposed Submission Adur Local Plan 2014 (in relation to New Monks Farm strategic allocation)	9 December 2015 – 4 January 2016

\* The deadline for the receipt of representations was extended by a further two weeks.

1.4 It is important to note that the stages set out above were not the only consultation undertaken in preparation of the Local Plan. Since work first began on the document in 2008, there has been an on-going process of dialogue with key stakeholders such as West Sussex County Council; infrastructure providers; statutory bodies including the Environment Agency; landowners and developers.

## From Core Strategy to Local Plan

1.5 The original intention was to progress a Core Strategy addressing strategic sites and policy issues followed by a separate document on Site Allocations and Development Management policies. A decision to move instead to a Local Plan encompassing all of these elements was taken in 2011, in order to progress the document more quickly and to be consistent with the Coalition Government's

emerging approach. This had no impact on work relating to the evidence base or former consultation which remained relevant but does explain changes in the title of the document and the breadth of policies being consulted on in later stages. In addition it should be noted that initially the Core Strategy covered the whole of Adur District. However, following the granting of full powers to the South Downs National Park Authority (SDNPA) in 2011, it was subsequently agreed that the development plan document being progressed by the SDNPA would include that part of Adur which lies within the National Park. As a result the Adur Local Plan covers only that part of Adur which lies outside of the South Downs National Park.

## **The Statement of Community Involvement**

**1.6** The guiding principles for all consultation relating to the Local Plan are set out in the Council's Statement of Community Involvement (SCI). Adur District Council's original SCI was adopted in 2006. Following joint working with neighbouring Worthing Borough Council, a joint SCI was adopted in 2012, taking into account new issues such as Duty to Co-operate and neighbourhood planning. This document can be found on the Councils' website [www.adur-worthing.gov.uk/adur-ldf/statement-of-community-involvement](http://www.adur-worthing.gov.uk/adur-ldf/statement-of-community-involvement).

**1.7** The Council's views are that taking account of the public's opinions (and those of other stakeholders) and local knowledge as early as possible is the best way to make sure that development in both areas has the widest possible local support. By making the process as clear as possible, it will be easier for the public to see how decisions have been made and how comments have been considered. To achieve this, the Council will:

- keep any consultation process simple and communicate clearly;
- make it easy for the public to be involved;
- make sure the public's involvement counts, and
- share information and provide feedback.

**1.8** In addition to the general public, the Council has a range of bodies and organisations to consult. There are essentially two categories referred to throughout this document. **Specific Consultation Bodies** are those that the Council has a statutory duty to consult with should it believe that they have an interest in the subject covered. Appendix One sets out those that will always be consulted on development plan documents. **General Consultation Bodies** on the other hand are those that the Council may consult should it be appropriate to do so. These include community and local environment groups as well as bodies representing the interests of specific groups, for example, ethnic, religious, and disabled interests.

**1.9** Some groups are harder to reach than others. In Adur, the young and the working age population have both been under-represented in consultation responses. Contacting schools, youth clubs and the Youth Council, and targeting

railway stations as a means of contacting commuters are options which have been used to address this situation.

### **The Consultation Database**

**1.10** 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. These individuals and groups are contacted when appropriate throughout the plan preparation process.

### **Newsletters**

**1.11** From 2011 the Council has used a newsletter as a means to advertise key stages or updates in the process of preparing the Core Strategy / Local Plan. It has been sent to everyone on the consultation database, either via email or post. Eleven had been published by February 2016. They are also published on the Council's website.

## **2. Stakeholder Issues and Options 2010**

June – July 2010

### **A brief introduction to the consultation.**

**2.1** As part of the process of evidence gathering, the Council decided to undertake a comprehensive consultation exercise with key stakeholders. This was viewed as an opportunity to “fact check”, to ensure that correct information was fed into the subsequent public consultation document.

### **Who was invited to make representations?**

**2.2** This consultation stage was aimed at key infrastructure providers including West Sussex County Council, developers associated with certain sites such as Shoreham Airport, and some statutory agencies, for example, Natural England, English Heritage, and the Highways Agency (now known as Historic England and Highways England).

**2.3** Appendix One gives a full list of statutory consultees who provided a response to this consultation.

### **How were they invited to make representations?**

**2.4** A ‘slimline’ Draft Core Strategy document was produced, containing a vision for the District; key objectives; discussion on four spatial options and a range of policy options. Four greenfield housing sites were included for discussion with a range of housing levels. The sites were at New Monks Farm, Lancing north of the Hasler Estate, Lancing, Sompting Fringe and Sompting North. Opportunities for development at Shoreham Airport, Shoreham Harbour and Shoreham Cement Works were also considered.

### **A summary of the main issues raised as a result of the consultation.**

**2.5** A number of stakeholders responded in some depth to the consultation. In addition to infrastructure requirements, the issues covered included:

- green infrastructure and biodiversity;
- the implications of development for air quality;
- the role of Shoreham Airport as a visitor attraction;
- flooding issues both in relation to specific sites and the general development management policy;
- the role of a mixed development at New Monks Farm in delivering regeneration benefits;
- the need for development sites to address water supply, sewerage and wastewater treatment;

- how to address the future of Shoreham Cement Works in the light of National Park designation; and
- the protection of the built and natural environment.

**How the issues were addressed.**

**2.6** A number of follow up meetings took place to discuss issues that had been raised through this consultation exercise. Overall a significant amount of evidence was provided in relation to the key sites and to infrastructure requirements in relation to development. In addition, guidance on a range of issues such as transport, and the environment was reflected in changes made to the evolving policies of the Plan.

### 3. Adur Housing and Employment Options 2011

27th June – 7th August 2011

#### A brief introduction to the consultation

**3.1** With the South East Plan set to be abolished, the role of setting the housing target for the Core Strategy devolved to the Council and its local community. This stage of consultation sought views, therefore, on what level of housing and employment development should be included in the draft Adur Core Strategy. (It should be noted that by this point the Local Plan no longer addressed that part of Adur within the South Downs National Park – see para 1.5 above).

#### Who was invited to make representations?

**3.2** Over 400 consultees on the consultation database were sent information by email or post as appropriate. This included specific consultation bodies; general consultation bodies and any other individual or organisation who had asked to be kept informed (see paragraph 1.10). In order to reach the wider public, publicity information and / or leaflets were available at the Council's offices and on its website; and at libraries; Parish Council Offices; health centres; and local shops. Leaflets were also made available to Members for distribution to their constituents, and via a number of local events. An e- newsletter was published on the Council's website and distributed by email.

**3.3** Appendix One gives a full list of statutory consultees who provided a response to this consultation.

#### How were they invited to make representations?

##### Consultation documents.

**3.4** The consultation document consisted primarily of a leaflet with brief questionnaire, with two supporting background documents: an Options Technical report; and Sustainability Appraisal of the options. These documents can be found on the Council's website [www.adur-worthing.gov.uk/media/media,98760,en.pdf](http://www.adur-worthing.gov.uk/media/media,98760,en.pdf). The consultation sought views on four housing options and two employment options as follows:

Housing Options	
Option 1	65 homes per year; 1105 homes 2011-2028*: brownfield land only.
Option 2	105 homes per year; 1785 homes 2011-2028: level of development set in South East Plan.
Option 3	155 homes per year; 2635 homes 2011-2028: more opportunities for affordable housing than Options 1 and 2.
Option 4	270 homes per year; 4590 homes 2011-2028: would meet



	all Adur's predicted housing needs.
<b>Employment Options</b>	
Option A	Baseline Scenario: no allocation of new employment sites
Option B	Economic Intervention Scenario: allocation of new employment sites.

\*This should have read 67 homes per year: 1150 homes 2011-2028. As the difference was only 2 homes per year, this was not thought to undermine the integrity of the consultation, especially as this represented the "brownfield" option.

**3.5** The opportunity was made for people to respond to the questionnaire online or by returning a paper copy.

Media.

**3.6** A press release was issued before the start of the consultation period.

Presentations / events attended by officers.

**3.7** Presentations or seminars were undertaken with local community groups; the Local Strategic Partnership Executive Board; the Shoreham Airport Consultative Committee; Parish Councils, and members of Adur Viewpoint, and those on the District's Residents Panel, who had expressed an interest in planning. In addition, officers held sessions for three classes at a Lancing secondary school and attended the Southwick Fair and the Shoreham Farmers Market.

**A summary of the main issues raised as a result of the consultation.**

**3.8** A total of 169 responses were received. 14 were sent directly online and 155 were received on paper. As plan preparation was still at an informal stage (Regulation 18), comments were accepted after the end of the consultation period.

**3.9** The results in relation to each option were as follows:

	Questionnaire responses	Viewpoint seminar	Sir Robert Woodard Academy
Housing Option 1	47 (28%)	4	7
Housing Option 2	55 (33%)	9	28
Housing Option 3	25 (15%)	10	8
Housing Option 4	28 (17%)	1	1
No option selected	14 (8%)	0	0
<b>Total</b>	<b>169</b>	<b>24</b>	<b>44</b>
Employment Option A	67 (40%)	9	16
Employment Option B	87 (51%)	15	32
No option selected	15 (9%)	0	0
<b>Total</b>	<b>169</b>	<b>24</b>	<b>48</b>

**3.10** Lancing Parish Council did not support any of the options due to concerns regarding housing densities; infrastructure; drainage problems, and the number of empty business properties in the area. Sompting Parish Council reluctantly supported Housing Option 1 and Employment Option A with concerns regarding the loss of gaps between Lancing / Sompting and Worthing, and congestion on the A27 and A259 roads.

**3.11** The most common general issues raised were:

- The limited environmental capacity of the area to absorb new development.
- The strain new housing would place on the social infrastructure of the District.
- Exacerbation of existing congestion problems on the A27 and A259 by new housing and employment.
- Exacerbation of existing parking problems by new development.
- Concerns regarding development in areas at risk of flooding.
- The need for more affordable housing.
- The need to bring empty properties back into use before new properties are built.
- The impact on/loss of the character of the District.
- Only one option (Option 4) meets the District's housing demand.

**How the issues were addressed.**

**3.12** Two issues impacted on the relevance of the consultation results in moving forward with housing numbers in the Core Strategy. First, the number of responses was low despite the level of publicity. Second, the Government had subsequently strongly indicated a new direction through publication of the Draft National Planning Policy Framework. This related to basing Local Plans on objectively assessed development needs, and joint working. These factors together with other advice and evidence (including the Sustainability Appraisal) led the Council to decide to move forward by consulting further on two housing options based on Options 2 and 3, focusing on specific greenfield sites that would need to be allocated to enable that level of development.

**3.13** The consultation results in relation to Employment were considered to indicate a clear preference for Option B: the Economic Intervention scenario. It was proposed, therefore, to include allocations in the emerging document to reflect this.

## **4. Draft Adur Local Plan 2012**

19th September – 31st October 2012

### **A brief introduction to the consultation**

**4.1** This was the first opportunity to consult on a draft of the whole Adur Local Plan, setting out the Vision and Objectives; a Strategy for Change and Prosperity; area based policies for the main settlements and countryside, and development management policies. A key element at this stage related to Housing Target Options. Two options were put forward with a range of greenfield site allocations.

### **Who was invited to make representations?**

**4.2** Approximately 570 consultees on the consultation database were sent information by email or post as appropriate. This included specific consultation bodies; general consultation bodies and any other individual or organisation who had asked to be kept informed (see paragraph 1.10). In order to reach the wider public, all of the main documents together with a leaflet / questionnaire were available at the Council's offices and on its website; at libraries; Parish Council Offices, and community centres. Copies of the leaflet / questionnaire were also distributed to various shops, cafes, public houses, and health centres throughout Adur. Facebook was used for the first time as a means to publicise the consultation exercise. A newsletter was published earlier in the summer to highlight the consultation in advance.

**4.3** Appendix One gives a full list of statutory consultees who provided a response to this consultation.

### **How were they invited to make representations?**

#### Consultation documents

**4.4** The consultation documents consisted of:

- A full version of the Draft Adur Local Plan 2012;
- An eight page A3 leaflet with short questionnaire, setting out the background to the Plan, the housing options and employment proposals. This was the most widely distributed document. The questionnaire could also be filled in online;
- A short document setting out answers to Frequently Asked Questions;
- A Background Evidence Document;
- The Sustainability Appraisal;
- Sequential Test and Exception Test of sites included in the Plan, and
- The Adur Habitats Regulations Assessment.

These documents can all be found on the Council's website ([www.adur-worthing.gov.uk/adur-local-plan-consultation/2012-consultation](http://www.adur-worthing.gov.uk/adur-local-plan-consultation/2012-consultation)).

**4.5** All aspects of the Draft Local Plan were set out for consideration. This included:

- the Vision and Objectives developed from work with stakeholders early in the plan process;
- a Strategy for Change and Prosperity to facilitate regeneration and meet needs for housing and employment land;
- area based policies for the main settlements and Adur's countryside, and
- development management policies covering issues such as conservation areas and listed buildings, open space provision and sustainable development.

**4.6** Following on from the previous consultation stage, the Draft Local Plan 2012 put forward two Housing Target Options up to 2028, with a range of greenfield site opportunities as follows:

<b>Housing Option A</b>	<b>Target</b>	1785 homes (105 per year) plus 1050 at Shoreham Harbour. Not dissimilar to the South East Plan figure.
<b>Option A1</b>		450 homes at New Monks Farm; 250 homes at Sompting Fringe; 300 homes at Hasler;
<b>Total 1870 homes</b>		870 homes on brownfield sites.
<b>Option A2</b>		450 homes at New Monks Farm; 450 homes at Hasler;
<b>Total 1770 homes</b>		870 homes on brownfield sites.
<b>Option A3</b>		450 homes at New Monks Farm; 420 homes at Sompting Fringe;
<b>Total 1740 homes</b>		870 homes on brownfield sites.
<b>Housing Option B</b>	<b>Target</b>	2635 homes (155 per year) plus 1050 at Shoreham Harbour. Goes further towards meeting housing needs but has more impact on Local Green Gaps, flood risk and on infrastructure.
		600 homes at New Monks Farm; 210 homes at Sompting North; 420 homes at Sompting Fringe; 600 homes at Hasler; 870 homes on brownfield sites.

**4.7** In order to pursue the agreed strategy of Economic Intervention, up to 66,000 square metres of land was allocated for employment generating uses at Shoreham Airport, New Monks Farm and Shoreham Harbour.

## Media

**4.8** An advert was placed two weeks running in the local weekly paper setting out the location and dates of the consultation exhibition, and giving general details on the overall consultation exercise. In addition, a full page article appeared setting out key issues of the Draft Local Plan and how to participate in consultation.

**4.9** Information about the consultation exercise was put on the Council's Facebook page.

## Exhibitions, presentations and events attended by officers

**4.10** An exhibition about the Draft Local Plan was located at six different venues throughout Adur over a six week period. These were the key community buildings in each of the four main settlements, the Council's offices and, for one morning, the Shoreham Farmers Market. The exhibition was staffed by Planning Policy Officers on certain days, which were publicised in advance.

**4.11** Presentations or seminars were held with the Local Strategic Partnership, interested members of the Viewpoint Panel, and the Youth Council.

## **A summary of the main issues raised as a result of the consultation.**

**4.12** 289 representations were received from members of the public and a range of organisations and businesses. A summary of the main issues raised was made available on the Council's website, [www.adur-worthing.gov.uk/media/media,111437,en.pdf](http://www.adur-worthing.gov.uk/media/media,111437,en.pdf)

In terms of the two Housing Targets, preferences were as follows:

<b>Housing Target</b>	<b>Number of votes</b>	<b>Percentage</b>
Option A: 1785 homes	123	42.6
Option B: 2635 homes	31	10.7
None of the above	47	16.2
No specific preference	4	1.4
No target selected.	84	29.1
<b>Total</b>	<b>289</b>	<b>100</b>

**4.13** Results regarding the various Housing Options were:

<b>Housing Option</b>	<b>Number of votes</b>	<b>Percentage</b>
Option A1	28	9.7
Option A2	26	9
Option A3	66	22.8
Option B	28	9.7
None of the above	49	16.9
No option selected	90	31.1
No specific preference	2	

<b>Total</b>	<b>289</b>	<b>100</b>
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**4.14** Some of the other main issues raised were as follows:

- neither of the housing targets are acceptable as they are too high and would have unacceptable impacts on the District’s resources and infrastructure;
- more emphasis should be put on brownfield development, Shoreham Harbour or smaller pockets of development than the greenfield sites;
- flood risk and inadequate surface drainage were cited as particular issues in relation to development at New Monks Farm and Hasler Estate;
- loss of Local Green Gaps and biodiversity were concerns particularly in relation to allocations at New Monks Farm and Sompting;
- impact on major roads such as the A27 and A259, and on more local residential roads from the increase in traffic arising from development;
- the inadequacy of current infrastructure such as water supply, schools and health facilities to cope with levels of development proposed;
- concerns about the impact of employment development at Shoreham Airport on the operations of the airport itself;
- general support for development at Shoreham Harbour.

**How the issues were addressed**

**4.15** Significant concerns were raised regarding flood risk at the Hasler Estate, including by the Environment Agency. Further evidence work, discussions and a lack of any information from the developer regarding flood risk and deliverability led to the decision that this site was not deliverable and it was consequently excluded from the Local Plan. Similar work on the other greenfield sites especially regarding landscape, biodiversity and deliverability led to a reappraisal of their capacity. This resulted in a housing target figure being carried forward that did not precisely reflect either of those put forward in the 2012 Plan. The impact of this work on the employment allocations saw a reduction in capacity at Shoreham Airport and Shoreham Harbour and a consequent lower overall target.

**4.16** A policy regarding water quality was added in response to comments received from Southern Water now Policy 36 of the Proposed Submission Adur Local Plan 2014. Other alterations were made to policies and to supporting text to address a range of issues raised.

## 5. Revised Draft Adur Local Plan 2013

26th September – 7th November 2013<sup>1</sup>

### A brief introduction to the consultation

**5.1** This version of the Local Plan set out the Council's chosen housing target and detailed policies regarding the greenfield sites allocated to help meet that target. It also contained a revised employment target and changes to other policies reflecting the outcome of consultation and further work.

### Who was invited to make representations?

**5.2** Approximately 750 bodies or individuals on the consultation database were sent information by email or post regarding the consultation arrangements. This included specific consultation bodies, general consultation bodies and any other individual or organisation who had asked to be kept informed (see paragraph 1.10). Members of the Adur and Worthing Local Strategic Partnership Board were asked to pass on information about the consultation to their relevant groups.

**5.3** In order to reach the wider public, all of the main documents together with a leaflet were available at the Council's offices and on its website; and at the three District libraries and at all the exhibitions. Copies of the leaflet were also distributed to various shops, cafes, public houses, community centres and health centres throughout Adur, as well as being made available to Councillors for distribution at their surgeries. Facebook and Twitter were used as a means to publicise the consultation exercise as a whole and individual events within it. A newsletter was published on the Council's website and distributed by email or by hard copy where consultees did not have email addresses.

**5.4** Appendix One gives a full list of statutory consultees who provided a response to this consultation.

### How were they invited to make representations?

#### Consultation documents

**5.5** The consultation documents consisted of:

- The Revised Draft Adur Local Plan 2013;
- A short summary leaflet explaining the role of the Local Plan, the key allocations and details of the consultation exercise;
- A consultation form for responses<sup>2</sup>, with separate equalities monitoring form;
- A Background Evidence Document;

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<sup>1</sup> Due to the level of interest generated, the period for submitting representations was extended by two weeks.

<sup>2</sup> Representations not using this form were also accepted.

- The Sustainability Appraisal;
- Sequential Test and Exception Test of sites included in the Plan; and
- A Draft Infrastructure Delivery Plan.

These documents can be found on the Council's website [www.adur-worthing.gov.uk/adur-local-plan-consultation/2013-consultation](http://www.adur-worthing.gov.uk/adur-local-plan-consultation/2013-consultation)

**5.6** As in the case of the 2012 Local Plan, the whole document was open to consultation. The key issues were:

- A housing provision target of 2797-2947 dwellings between 2011-2031;
- The allocation of New Monks Farm for 450-600 homes, 10,000 square metres of employment generating floorspace, and community infrastructure;
- The allocation of land at West Sompting for 480 dwellings, and
- The allocation of 38,000 square metres of land for employment generating uses at Shoreham Airport, New Monks Farm and Shoreham Harbour.

### Media

**5.7** Adverts publicising the consultation exercise appeared in two local weekly newspapers fortnightly through the six week consultation period. Articles about the Local Plan appeared for one week in the weekly Shoreham Herald and twice in the weekly Lancing Herald, at the very beginning of the six week period. In addition, one officer was videoed explaining the Local Plan consultation and how to respond. This was posted on the newspaper's website for approximately one week.

**5.8** During the six week consultation period, Council officers posted on Twitter four times and Facebook 12 times. This was used to publicise the consultation exercise as a whole and also individual events during it, for example, the presence of the exhibition and staff at the Shoreham Farmers Market. Various community organisations, members of the public and local MPs also used social media to refer to the Local Plan during the six week period.

### Exhibitions, presentations and events attended by officers

**5.9** An exhibition was set up consisting of information boards relating to the Plan and its proposals, with additional material to assist people in making their representations. Two copies of the exhibition were produced to increase the amount of time it could be available in different locations over the six week period. Each of the District's four community centres was used as a venue in addition to the Council's offices and for one morning only, the Shoreham Farmers Market. The exhibitions were manned by Planning Policy Officers on certain days. These were advertised in advance.

**5.10** Officers attended a range of meetings to publicise and explain the Local Plan consultation. These were with the Shoreham Airport Consultative Committee;



Sompting Parish Council; Lancing Parish Council; Adur and Worthing Business Partnership and the Shoreham Society.

### **A summary of the main issues raised as a result of the consultation**

**5.11** In the region of 1100 responses were received from individuals, businesses and stakeholders. These included standard response letters distributed by residents, community groups, and local political organisations. Both the local Conservative Party office and local Liberal Democrat Party office forwarded representations that had been passed to them by residents. In addition, a petition entitled “Keep the Gaps on the Map” was submitted containing 378 signatures and comments.

**5.12** A database of representations, standard responses to frequently raised issues, and an Interim Statement of Consultation were made available on the Council’s website, ([www.adur-worthing.gov.uk/adur-local-plan-consultation/](http://www.adur-worthing.gov.uk/adur-local-plan-consultation/)) following the consultation period. By far the most representations were received in relation to development at West Sompting, followed by New Monks Farm and Shoreham Airport.

**5.13** The key issues raised were:

#### Overall housing provision

- Develop brownfield sites instead of greenfield;
- Concerns about impact of development on social cohesion and infrastructure;
- Where is demand for the housing coming from?

#### New Monks Farm

- The site is an established flood plain so development here will affect surrounding areas;
- Concern regarding conflict between development and airport safety and noise;
- Unacceptable strain will be placed on roads and infrastructure;
- Impact on wildlife and habitats.

#### West Sompting

- Existing traffic congestion will be made worse;
- Development will be detrimental to the character of Sompting;
- Strain on infrastructure;
- Will there be enough jobs locally for new residents or will commuting increase?
- Danger to pedestrians of increased traffic in an area lacking pavements.

### Shoreham Airport

- Concerns about feasibility of a roundabout onto A27 instead of traffic lights;
- Development may impact on future prospects for the Airport and existing businesses;
- Increased risk of flooding in surrounding areas;
- Impact on roads and on wildlife and habitats.

### Shoreham Harbour

- Need to consider marine habitats and water quality issues;
- Concerns from local businesses about relocating;
- Need for improved walkways and cycle routes as well as an all tide public slipway;
- Impact of regeneration on the historic culture of Shoreham Harbour.

### Countryside and Coast

- The function of the local green gaps is not transparent in the Plan;
- Landscape views should be protected as much as possible.

### **How the issues were addressed**

**5.14** For a variety of reasons (including the need to deliver Adur's Objectively Assessed Needs for housing, constraints to the Local Plan area, the Council's evidence base, and a lack of suitable, alternative sites) the allocations for West Sompting and New Monks Farm remain in the Plan. However text accompanying Policy 3: Housing has been clarified further to explain that brownfield sources of housing will be utilised, and explains how they have been taken into account, and how much housing they are likely to deliver over the Plan period. The implementation of the Shoreham Adur Tidal Walls is not expected to address or alleviate the groundwater issues affecting the Hasler (West Beach) estate, and as a result this site remains excluded from the Plan. The supporting text for the strategic allocations has been checked to ensure it makes clear the precise flood zone each site lies within, and refers to the Sequential and Exceptions test (which has been published alongside previous versions of the Local Plan, as well as the Proposed Submission Adur Local Plan 2014). Policy 5 New Monks Farm has been amended to clarify that delivery of the upper end of the proposed housing figure for this site is subject to demonstration to the satisfaction of the Local Planning Authority that there is no adverse impact on biodiversity and landscape.

**5.15** Further detailed work regarding traffic impact (and mitigation) has been commissioned by the site promoters of West Sompting. The Plan makes clear that the strategic sites will be expected to mitigate their impact on the strategic and local road network, and includes references to specific junctions where these mitigations will be required. Work with infrastructure providers has been ongoing and is

addressed in the Infrastructure Delivery Plan 2014 which accompanies the Proposed Submission Adur Local Plan 2014.

**5.16** Issues relating to the Shoreham Harbour regeneration area will be addressed in detail through the emerging Shoreham Harbour Joint Area Action Plan.

**5.17** Within the Proposed Submission Adur Local Plan 2014 Policy 13: 'Adur's Countryside and Coast' has been amended, and a new policy (Policy 14 Local Green Gaps) has been created to ensure clarity relating to the aims of these two policies.

## **6. Proposed Submission Adur Local Plan 2014**

20th October – 1st December 2014

### **A brief introduction to the consultation**

**6.1** 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.

**6.2** 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.

**6.3** This version of the Plan included a revised housing provision target of 3488-3638 dwellings between 2011-2031 representing an increase from the previous version of the Plan 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.

**6.4** 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.

### **Who was invited to make representations?**

**6.5** Approximately 1800 bodies or individuals on the consultation database were sent information by email or post regarding the publication arrangements. The Councils' Twitter and Facebook pages were also used to publicise the Plan.

**6.6** 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.

**6.7** Appendix One gives a full list of statutory consultees who submitted a representation.

## **How were they invited to make representations?**

### Consultation documents

**6.8** The consultation documents consisted of:

- Statement of Representation Procedures
- Proposed Submission Adur Local Plan 2014 (including Appendices, Policies Map and Inset Map)
- Background Evidence Document
- Sustainability Appraisal
- Statement of Consultation 2014
- 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
- Evidence studies
- Frequently asked questions

These documents can be found on the Council's website

[www.adur-worthing.gov.uk/adur-ldf/adur-local-plan/](http://www.adur-worthing.gov.uk/adur-ldf/adur-local-plan/)

## **A summary of the main issues raised as a result of the consultation**

**6.9** 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 [www.adur-worthing.gov.uk/adur-ldf/adur-local-plan/](http://www.adur-worthing.gov.uk/adur-ldf/adur-local-plan/)

**6.10** The key issues raised were:

### Overall Housing Provision

- Insufficient sites have been taken forward to meet identified need;
- The allocation of greenfield sites is unsustainable.

### New Monks Farm

- The indicative location of the roundabout to serve this site and Shoreham Airport is not the most appropriate option;
- The retention of local green gaps is not supported by national planning policy.

### West Sompting

- Traffic generated by the development and proposed traffic calming measures will increase congestion impacting on local air quality;
- The site will further erode the green gaps between Worthing and Sompting.

### Shoreham Airport

- The level of development is unviable and should be increased;
- Local of development within the site should be reconsidered due to impacts on ecology and views across the airport.

### Countryside and Coast

- Insufficient landscape evidence to justify the approach of Policy 13;
- The distinction between Policies 13 and 14 is unclear.

### Development Management

- Policies need reviewing to take account of the Housing Standards Review;
- Affordable housing rates are unjustified;
- Policy 26 provides no flexibility and fails to recognise other employment generating uses;
- It is unclear how applicants will afford open space requirements.

### **How the issues were addressed**

**6.11** As a result of the issues raised with regard to the New Monks Farm allocation, the progression of the plan was put on hold, and not submitted in March 2015 as previously intended. The opportunity was taken to refine the Plan's evidence base and, further work was commissioned in relation to transport, landscape and development viability. In addition, work in relation to Adur's Objectively Assessed Needs figure has been updated.

**6.12** Before progressing the Plan further, a brief, focussed consultation exercise took place (under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 ) in December 2015/January 2016, in relation

to the proposed allocation at New Monks Farm, an area where development of 600 homes, employment space, a country park and a new school are proposed.

## **7. Proposed Amendments to the New Monks Farm Allocation within the Proposed Submission Adur Local Plan 2014.**

9th December 2015 – midnight 4th January 2016

### **A brief introduction to the consultation**

**7.1** As a result of the publication (October – December 2014) of the Proposed Submission Adur Local Plan 2014 under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, some representations submitted to the Council proposed changes to the strategic allocation of New Monks Farm in the Plan. The allocation in the Proposed Submission Plan was for mixed use development of between 450 and 600 new homes, a community hub, land for a new primary school, 10,000 sq m employment generating floorspace, a new access on to the A27 and a country park. The Council considered these representations and proposed some changes to the allocation. The main proposed changes relate to the following:

- 1) The number of dwellings proposed is 600 (rather than 450-600)
- 2) The indicative location of the proposed roundabout is moved eastwards to a more central location between Shoreham (Brighton City) Airport and the New Monks Farm allocation.
- 3) The existing Withy Patch Gypsy and Travellers site is relocated westwards (to allow for the revised roundabout location). Relocation also provides an opportunity to improve the site and facilities, address flood risk and enable some limited future expansion to meet identified needs from within Withy Patch.
- 4) The site allocation boundary is amended, to include the existing Withy Patch site. Including this area within the site boundary will mean that the relocated site and flood risk improvements will be delivered as part of the development at New Monks Farm.
- 5) The proposed Built Up Area Boundary amendment (between the proposed built up area of New Monks Farm, and the proposed country park) is shown as indicative; the final boundary will be determined at planning application stage based on landscape and drainage assessments.

**7.2** Advice was sought from the Planning Advisory Service, and it was agreed that rather than submit the Plan to the Planning Inspectorate with the recommended changes, it was appropriate that further consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 be undertaken. This was seen as particularly important with regards to the residents of the Withy Patch Gypsy and Travellers site, which would be significantly affected by the proposal for a centrally-located



roundabout. However a wider consultation exercise was carried out, to ensure the proposals received wider publicity.

- 7.3** A brief, focussed consultation exercise was undertaken (under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012) to allow consideration of these proposed changes to the site allocation. This consultation took place from 9 December 2015 to 4 January 2016.

### **Who was invited to make representations?**

**7.4** All organisations (including statutory consultees/individuals) on the Local Plan consultation database (approximately 1800) were emailed/ posted a newsletter in advance of the consultation to inform them of this consultation exercise.

**7.5** In order to reach the wider public, a consultation page was set up on the Council's website, information was posted on the Councils' Twitter and Facebook pages and hard copies of the newsletter and consultation leaflet were left at Lancing Parish Council (as the relevant allocation is located in Lancing), all libraries in Adur, at the Shoreham Centre and the Adur Civic Centre.

**7.6** Residents of the Withy Patch Gypsy and Travellers site as well as representatives of the site management company were invited to two meetings (one at Withy Patch), to ensure that those affected by the potential relocation of the site were aware of the proposals.

**7.7** Appendix One gives a full list of statutory consultees who submitted a representation.

### **How were they invited to make representations?**

**7.8** The consultation was carried out as follows:

- A meeting was held at the Withy Patch Gypsy and Travellers site, to ensure that those affected by the potential relocation of the site were aware of the proposals, and had the opportunity to make comments/ raise any concerns. Residents and representatives of the site management company attended this meeting. A further session for residents was also arranged, but was unattended.
- A meeting was held with a representative of a residents group, local to the allocation.
- All organisations/individuals on the Local Plan consultation database (approximately 1800) were emailed/ posted a newsletter in advance of the consultation to inform them of this consultation stage and make clear that paper copies of the consultation leaflet could be sent out on request.
- A consultation page was set up on the Council's website (with a tile 'link' from the main homepage). The consultation leaflet was available to view on this page.
- Hard copies of the newsletter and consultation leaflet were left at Lancing Parish Council (as the relevant allocation is located in Lancing), all libraries in

Adur, at the Shoreham Centre, Pond Road Shoreham, and the Adur Civic Centre (before its closure to the public).

- Information was also posted on the Council's Facebook page and Twitter feed.

**7.9** This approach is consistent with both the relevant Regulations, and the Adur and Worthing Statement of Community Involvement (2012).

### **A summary of the main issues raised as a result of the consultation**

**7.10** Responses were received from 29 individuals and organisations/ companies. These can be viewed in full on the Council's website [www.adur-worthing.gov.uk/adur-ldf/adur-local-plan/](http://www.adur-worthing.gov.uk/adur-ldf/adur-local-plan/)

**7.11** The key issues raised in relation to the proposed changes were:

#### The number of homes

- Explicit support for the proposed 600 homes since this aids viability, helps to meet housing need, makes best use of land and demonstrates positive planning.
- Oppose on grounds of lack of flexibility, and potential adverse impact on biodiversity.
- Other comments were made in relation drainage issues.

#### New indicative location for the roundabout

- Explicit support for the new location.
- Specific concern by Historic England due to potential impact on heritage asset (SAM); wish to be involved in discussions at an early stage.
- General points made regarding traffic volumes, drainage, and specific queries relating to speed management etc. - not directly related to merits of revised location of the roundabout.

#### Amending the site allocation boundary to include the existing site of Withy Patch

- Drainage concerns
- The Environment Agency has no concerns in principle with the potential relocation of Withy Patch providing there is betterment in terms of flood risk and that for any future expansion of the site, land raising is carried out prior to any application for additional pitches.

### The location of the relocated Withy Patch site

- Explicit support for the location
- Drainage concerns
- Residents of the Withy Patch site (those who attended the consultation meeting) were broadly supportive, and provided some useful suggestions with regards to the layout and facilities of the relocated site.

### An indicative rather than detailed Built Up Area Boundary

- Support for the approach as it allows for appropriate flexibility. (A detailed boundary can be determined at application stage, based on drainage, landscape, ecology and other relevant evidence).

### **How the issues were addressed**

**7.12** Following the consultation exercise and analysis of the responses received, the Council agreed in March 2016 that the amendments set out above in paragraph 7.1 are incorporated into the Adur Local Plan.

**7.13** General points made during consultation regarding traffic volumes, drainage, and specific queries relating to speed management etc. would be addressed through a Transport Assessment in due course. With regard to the specific concern by Historic England on the potential impact on heritage asset (SAM), an assessment of heritage assets is currently being undertaken to address this matter further.

**7.14** Amendments to the Proposed Submission Adur Local Plan (2016) will be published for representations (Under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012) between 31<sup>st</sup> March and 11<sup>th</sup> May 2016. This document will include amendments resulting from some representations received to the Proposed Submission Adur Local Plan 2014, changes in Government policy and to reflect new evidence. The amendments will reflect changes to the New Monks Farm allocation referred to above in paragraph 7.1.

## **8. Sustainability Appraisal**

### **Introduction**

**8.1** A Sustainability Appraisal (SA) has accompanied every Core Strategy/Local Plan consultation document set out in this Statement other than the Regulation 18 consultation undertaken in 2015 proposing amendments to the New Monks Farm policy/site allocation. These proposed amendments to the New Monks Farm policy were appraised subsequent to the consultation and the details and results of this appraisal are set out in the SA of the Amendments to the Proposed Submission Adur Local Plan (2016).

**8.2** Prior to the 2011 Core Strategy consultation, a Sustainability Appraisal Scoping Report was produced which set out the baseline situation in the district, the various social, economic and environmental issues and also set out the Sustainability Appraisal Framework including the Sustainability Objectives. The five key stages of consultation on the SA were as follows:

1. Sustainability Appraisal Scoping Report May 2011
2. Sustainability Appraisal of the Core Strategy Housing and Employment Options Paper June 2011
3. Sustainability Appraisal of the Draft Adur Local Plan September 2012
4. Sustainability Appraisal of the Revised Draft Adur Local Plan 2013
5. Sustainability Appraisal of the Adur Local Plan (September 2014)

### **Who was invited to make representations?**

**8.3** Due to its fairly specific nature, the consultation on the Sustainability Appraisal Scoping Report was aimed at the key consultation bodies as set out in The Environmental Assessment of Plans and Programmes Regulations 2004 – Natural England, Historic England and the Environment Agency. However, in order to ensure that wider interests were also taken into account, given the environmental, social and economic factors taken into account in a Sustainability Appraisal the following were also consulted:

- Adur & Worthing Business Partnership
- Sussex Wildlife Trust
- Highways Agency (now Highways England)
- Sport England
- West Sussex County Council
- Neighbouring authorities including Brighton & Hove City Council, Arun District Council, Worthing Borough Council and the South Downs National Park Authority.

**8.4** With regard to the following Sustainability Appraisal consultations, these took place as part of the Local Plan consultations so the method of consultation for each SA stage was identical to that to each Local Plan consultation outlined in this report.

# APPENDIX ONE

## 1. Specific Consultation Bodies for the Local Plan process

Coastal West Sussex Clinical Commissioning Group	Arun District Council
Brighton & Hove City Council	British Gas
British Rail Property Board	British Telecom
Cable and Wireless	Cellnet
Chichester District Council	Coal Authority
Department for Transport	EDF Energy
Historic England	Environment Agency
Highways England	Homes and Communities Agency
Horsham District Council	Marine Management Organisation
Mid Sussex District Council	National Grid
Natural England	Network Rail
Powergen	Scottish Power
South Downs National Park Authority	South East Coast Strategic Health Authority
South East Water	Southern Water
Sport England	Transco
West Sussex County Council	Worthing Borough Council

## 2. Specific Consultation Bodies who responded to Stakeholder Issues and Options 2010

Coastal West Sussex Clinical Commissioning Group	EDF Energy
Historic England	Environment Agency
Highways England	Natural England
Scottish Power	South Downs National Park Authority
Southern Water	West Sussex County Council

## 3. Specific Consultation Bodies who responded to Housing and Employment Options 2011

Coal Authority	Highways England
Natural England	Southern Water
West Sussex County Council	

#### **4. Specific Consultation Bodies who responded to Draft Adur Local Plan 2012**

Arun District Council	Brighton & Hove City Council
Historic England	Environment Agency
Highways England	Horsham District Council
Mid Sussex District Council	South Downs National Park Authority
Southern Water	West Sussex County Council

#### **5. Specific Consultation Bodies who responded to Revised Draft Adur Local Plan 2013**

Arun District Council	Brighton & Hove City Council
Environment Agency	Highways England
Mid Sussex District Council	NHS Property Services
Natural England	South Downs National Park Authority
Southern Water	West Sussex County Council

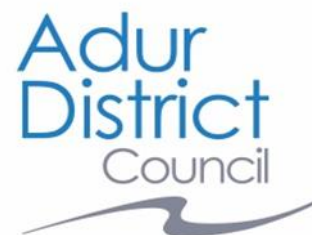
#### **6. Specific Consultation Bodies who responded to the Proposed Submission Adur Local Plan 2014**

Arun District Council	Brighton & Hove City Council
East Sussex County Council	Environment Agency
Highways England	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	

#### **7. Specific Consultation Bodies who responded to the Proposed Amendments to the New Monks Farm Allocation within the 2014 Proposed Submission Adur Local Plan**

Environment Agency	West Sussex County Council
Natural England	Historic England

## APPENDIX TWO



### PROPOSED SUBMISSION ADUR LOCAL PLAN 2014

#### **Statement of Representation Procedures (Regulation 19) Town and Country Planning (Local Planning) (England) Regulations 2012**

The Proposed Submission Adur Local Plan 2014 is being made available for representations over a six-week statutory period starting on 20th October 2014, until 5pm on 1st December 2014. During this period the Local Plan and Policies Map will be published and made available alongside other supporting documents including a Sustainability Appraisal.

The Proposed Submission Adur Local Plan 2014 sets out 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 Council intends to submit the Local Plan to the Secretary of State for Communities and Local Government. The Plan covers that part of Adur District which lies outside the South Downs National Park.

#### **Location of Documents for Inspection**

Copies of the Proposed Submission Adur Local Plan 2014, Policies Map and supporting documentation (including Sustainability Appraisal and Habitats Regulations Assessment) are available at the following locations for inspection:

**Adur Civic Centre**, Ham Road, Shoreham-by-Sea, BN43 6PR (Open 9.00am – 5:00pm Monday-Friday)

**Shoreham Library**, St Mary's Road, Shoreham-by-Sea BN43 5ZA (Open Mondays 10am-7pm, Tues, Wed, Thurs 10am – 6pm, Fri 10am – 5pm, Sat 10am-4pm)

**Lancing Library**, Penstone Park, Lancing BN15 9DL (Open Mon-Fri 10am – 6pm, Sat 10am-4pm)

**Southwick Library**, Southdown Road, Southwick, BN42 4FT (Open Mon-Fri 10am – 5pm, Sat 10am – 2pm)

In addition to providing copies of the said documents in accordance with Regulations 19 and 35, reference copies have been placed at Sompting Parish Council (Harriet Johnson Centre, Old School House, Loose Lane, Lancing BN15 0BG) and Lancing Parish Council (Parish Hall, South Street, Lancing BN15 8AJ).

Response forms are available at all the above locations, or from the Council's website.



**Electronic versions** of the Proposed Submission Adur Local Plan 2014, Policies Map and supporting documentation can be found on the Council's website at [www.adur-worthing.gov.uk/adur-local-plan-2014](http://www.adur-worthing.gov.uk/adur-local-plan-2014) along with response forms and guidance on how to make a representation.

### **Making a Representation**

Representations at this stage should only be made in relation to the legal compliance of the Local Plan and to the soundness of the Local Plan. Representations should specify in what respect(s) the Plan is considered to be unsound, and what change(s) would need to be made to make it sound. These terms are explained in a guidance note available from the locations set out above or from the Councils' website.

Anonymous comments or comments received outside these dates will not be accepted. Please note that comments cannot be treated as confidential. Copies of all comments will be made available for the public to view (including respondent's name) but will not include any personal contact details or signatures.

All representations received within the statutory consultation period will be submitted to the Secretary of State and considered as part of a public examination by an independent Planning Inspector.

Representations should be provided in writing. This can be done by completing and submitting the standard response form using the following methods:

**Email:** [planning.policy@adur-worthing.gov.uk](mailto:planning.policy@adur-worthing.gov.uk)

**Post to:** Planning Policy Team, Adur and Worthing Councils, Town Hall, Chapel Road, Worthing BN11 1BR.

#### **Or may be handed in at:**

- Adur Civic Centre, Ham Road, Shoreham-by-Sea, BN43 6PR or
- Portland House, 44 Richmond Road, Worthing, BN11 1HS

***Comments must be received by 5pm on 1st December 2014.***

#### **Request to be Notified**

Please indicate in your representation if you would like to be notified of the following:

- Submission of the Local Plan for public examination by an independent Inspector;
- Publication of the Inspector's recommendations; and/or
- The adoption of the Adur Local Plan.

For more information visit:

[www.adur-worthing.gov.uk/adur-local-plan-2014](http://www.adur-worthing.gov.uk/adur-local-plan-2014)

email [planning.policy@adur-worthing.gov.uk](mailto:planning.policy@adur-worthing.gov.uk)

or telephone: 01273-263000 and ask for the Adur Planning Policy Team.

