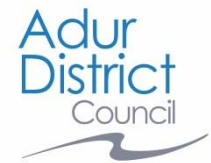


Amendments to the Proposed Submission Adur Local Plan (2016)



Representation Form



Return Address: adurplanningpolicy@adur-worthing.gov.uk

Or:


Planning Policy Team, Adur and Worthing Councils, Town Hall, Chapel Road,
Worthing, BN11 1BR

Or hand in at:

- Shoreham Centre, 2 Pond Road, Shoreham-by-Sea, BN43 5WU or
- Portland House, 44 Richmond Road, Worthing, BN11 1HS

Please return to Adur District Council by midnight on 11th May 2016
Late representations will not be considered.

Please note that at this stage, representations are only being sought on whether the amendments to the Plan are sound and/or legally compliant.

 Use of your information: Respondent details and representations will be forwarded to the Secretary of State for consideration when the Adur Local Plan is submitted for examination. All documents will be held by Adur District Council and representations will be published including on the internet e.g. www.adur-worthing.gov.uk. Personal contact details (address, email and phone number) will be removed from published copies of representations. Your information will be handled in accordance with Data Protection Act 1998.

Contact details will be added to the Adur Planning Policy consultees database to keep you informed on the progress of the Adur Local Plan and other related documents.

Please tick if you do **not** want to be informed.

This form has two parts:

- i. Part A - Respondent Details. You only need to fill this in once.
- ii. Part B - Your representation(s). Please fill in a separate sheet for each representation you make.

It is recommended that you read the Guidance Notes provided for an explanation of terms used in this form.

Part A – Personal Information
You only need to complete this section once

Personal Details

First name	<input type="text"/>	
Last name	<input type="text"/>	
Organisation (where applicable)	Albermarle (Shoreham) LLP and Longbow Investment no3 S.A.R.L	
Address line 1	C/O Agent	
Address line 2	<input type="text"/>	
Address line 3	<input type="text"/>	
Post Code	<input type="text"/>	Telephone <input type="text"/>
Email address	<input type="text"/>	

Agent's Details (if applicable)

First name	Adam	
Last name	Ross	
Organisation	Nexus Planning	
Job Title	Executive Director	
Address line 1	Nexus Planning, Suite A, 3 Weybridge Business Park	
Address line 2	Addlestone Road	
Address line 3	Weybridge	
Post Code	KT15 2BW	Telephone <input type="text"/>
Email address	<input type="text"/>	

Part B – Representation

Please use separate sheets for each representation

1. Which Amendment(s) to the Adur Local Plan does this representation relate to?

Amendments relating to:

Policy No.	<input type="text"/>	Paragraph No.	<input type="text" value="2.46"/>
Map	<input type="text"/>	Other section (please specify)	<input type="text"/>

2. Do you consider the Amendment(s) to be: (tick as appropriate)

- 2.1 Legally Compliant Yes No
- 2.2 Sound Yes No

Please read the Guidance Note for guidance on legal compliance and soundness.

If you have ticked no to 2.1, please continue to Q4.

If you have ticked no to 2.2, please continue to Q3.

If you have ticked yes to 2.1 and 2.2 please go to Q7.

3. Do you consider the Amendment(s) to the Adur Local Plan to be unsound because it is not: (tick as appropriate)

- 3.1 Positively Prepared
- 3.2 Justified
- 3.3 Effective
- 3.4 Consistent with National Policy

4. If you consider the Amendment(s) to the Adur Local Plan to be unsound or not legally compliant, please explain why in the box below:

Please see attached.

(Continue on a separate sheet if necessary)

5. Please explain in the box below what change(s) you consider necessary to make the Amendment(s) to the Adur Local Plan legally compliant and sound having regard to the reason you identified above.

(You will need to say why this change will make it legally compliant or sound. It will be helpful if you are able to put forward your suggested or revised wording. Please be as precise as possible).

Please see attached.

(Continue on separate sheet if necessary)

6. If your representation concerns soundness or legal compliance and is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination? (tick as appropriate)

No, I wish to communicate through written representations

Yes, I wish to speak to the Inspector at the hearing sessions

Please note: The Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the hearing part of the examination.

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

The wording of paragraph 2.46 has potentially significant implications on the delivery of the strategic Shoreham Airport allocation. We wish to participate at the examination in order to support the effectiveness and therefore soundness of the Plan.

--

8. Please tick if you do not wish to be informed of the following:

- When the Plan has been submitted for Examination
- When the recommendations from the Examination have been Published
- When the Local Plan has been adopted

What happens next?

Representations made to the Council will be passed to the Inspector for consideration.

Once this has happened, the Inspector will commence the examination and give notice of the start of the hearing sessions.

Interested parties will be informed of the start date of the hearing sessions and the matters to be considered.

Thank you for your representation.

Paragraph 2.46

Why the Amendment(s) to the Adur Local Plan are considered to be unsound or not legally compliant?

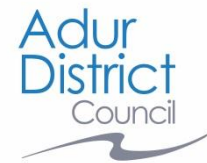
- 1 We support the amendment to paragraph 2.46 to confirm that the New Monks Farm strategic allocation can accommodate 600 dwellings. This will ensure that the potential of this site for development is fully utilised and also, importantly, increase the value generated by this major mixed-use development. This will help to ensure that this site can viably deliver the new access on to the A27 which is required to access material levels of development within this strategic allocation. It would also (as recognised by the Council in its proposed amendment to the last sentence of this paragraph) facilitate access to the strategic employment allocation at the adjacent Shoreham Airport site allocated under Policy 7, a factor of critical importance to the delivery of the Local Plan strategy as a whole.
- 2 However we consider that inclusion of specific reference to the access on to the A27 being a roundabout, located centrally between these two strategic allocations (as chosen through assessment of the alternatives within the Sustainability Appraisal), would add clarity and therefore make this paragraph more effective.

What change(s) are considered necessary to make the Amendment(s) to the Adur Local Plan legally compliant and sound having regard to the reason identified above?

- 3 Amend the last sentence of paragraph 2.46 to state that

*“Development at this site will require a new **central roundabout** access onto the A27 which would also help unlock further development at Shoreham Airport (See Policy 7).”*

Amendments to the Proposed Submission Adur Local Plan (2016)



Representation Form



Return Address: adurplanningpolicy@adur-worthing.gov.uk

Or:


Planning Policy Team, Adur and Worthing Councils, Town Hall, Chapel Road,
Worthing, BN11 1BR

Or hand in at:

- Shoreham Centre, 2 Pond Road, Shoreham-by-Sea, BN43 5WU or
- Portland House, 44 Richmond Road, Worthing, BN11 1HS

Please return to Adur District Council by midnight on 11th May 2016
Late representations will not be considered.

Please note that at this stage, representations are only being sought on whether the amendments to the Plan are sound and/or legally compliant.

 Use of your information: Respondent details and representations will be forwarded to the Secretary of State for consideration when the Adur Local Plan is submitted for examination. All documents will be held by Adur District Council and representations will be published including on the internet e.g. www.adur-worthing.gov.uk. Personal contact details (address, email and phone number) will be removed from published copies of representations. Your information will be handled in accordance with Data Protection Act 1998.

Contact details will be added to the Adur Planning Policy consultees database to keep you informed on the progress of the Adur Local Plan and other related documents.

Please tick if you do **not** want to be informed.

This form has two parts:

- i. Part A - Respondent Details. You only need to fill this in once.
- ii. Part B - Your representation(s). Please fill in a separate sheet for each representation you make.

It is recommended that you read the Guidance Notes provided for an explanation of terms used in this form.

Part A – Personal Information
You only need to complete this section once

Personal Details

First name	<input type="text"/>	
Last name	<input type="text"/>	
Organisation (where applicable)	Albermarle (Shoreham) LLP and Longbow Investment no3 S.A.R.L	
Address line 1	C/O Agent	
Address line 2	<input type="text"/>	
Address line 3	<input type="text"/>	
Post Code	<input type="text"/>	Telephone <input type="text"/>
Email address	<input type="text"/>	

Agent's Details (if applicable)

First name	Adam	
Last name	Ross	
Organisation	Nexus Planning	
Job Title	Executive Director	
Address line 1	Nexus Planning, Suite A, 3 Weybridge Business Park	
Address line 2	Addlestone Road	
Address line 3	Weybridge	
Post Code	KT15 2BW	Telephone <input type="text"/>
Email address	<input type="text"/>	

Part B – Representation

Please use separate sheets for each representation

1. Which Amendment(s) to the Adur Local Plan does this representation relate to?

Amendments relating to:

Policy No.	<input type="text"/>	Paragraph No.	<input type="text" value="2.49"/>
Map	<input type="text"/>	Other section (please specify)	<input type="text"/>

2. Do you consider the Amendment(s) to be: (tick as appropriate)

- 2.1 Legally Compliant Yes No
- 2.2 Sound Yes No

Please read the Guidance Note for guidance on legal compliance and soundness.

If you have ticked no to 2.1, please continue to Q4.

If you have ticked no to 2.2, please continue to Q3.

If you have ticked yes to 2.1 and 2.2 please go to Q7.

3. Do you consider the Amendment(s) to the Adur Local Plan to be unsound because it is not: (tick as appropriate)

- 3.1 Positively Prepared
- 3.2 Justified
- 3.3 Effective
- 3.4 Consistent with National Policy

4. If you consider the Amendment(s) to the Adur Local Plan to be unsound or not legally compliant, please explain why in the box below:

Please see attached.

(Continue on a separate sheet if necessary)

5. Please explain in the box below what change(s) you consider necessary to make the Amendment(s) to the Adur Local Plan legally compliant and sound having regard to the reason you identified above.

(You will need to say why this change will make it legally compliant or sound. It will be helpful if you are able to put forward your suggested or revised wording. Please be as precise as possible).

Please see attached.

(Continue on separate sheet if necessary)

6. If your representation concerns soundness or legal compliance and is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination? (tick as appropriate)

No, I wish to communicate through written representations

Yes, I wish to speak to the Inspector at the hearing sessions

Please note: The Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the hearing part of the examination.

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

The wording of paragraph 2.49 has potentially significant implications on the delivery of the strategic Shoreham Airport allocation. We wish to participate at the examination in order to support the effectiveness and therefore soundness of the Plan.

--

8. Please tick if you do not wish to be informed of the following:

- When the Plan has been submitted for Examination
- When the recommendations from the Examination have been Published
- When the Local Plan has been adopted

What happens next?

Representations made to the Council will be passed to the Inspector for consideration.

Once this has happened, the Inspector will commence the examination and give notice of the start of the hearing sessions.

Interested parties will be informed of the start date of the hearing sessions and the matters to be considered.

Thank you for your representation.

Paragraph 2.49

Why the Amendment(s) to the Adur Local Plan are considered to be unsound or not legally compliant?

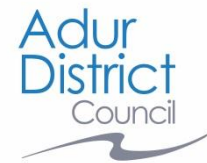
- 1 The suitability of a centrally positioned roundabout, as referenced within paragraph 2.49 as amended, has been previously accepted by the promoters of New Monks Farm and of Shoreham Airport as referenced at paragraph 12.3.3 of the Council's Sustainability Appraisal ('the SA'). As such we very much support the inclusion of the additional wording in this paragraph which clarifies the preferred location of the new roundabout.
- 2 However we consider that further clarity could be added to this paragraph in relation to the chosen access solution to these sites, which would make it more effective in supporting the Council's objectives for the delivery of both the strategic allocations at New Monks Farm and Shoreham Airport.

What change(s) are considered necessary to make the Amendment(s) to the Adur Local Plan legally compliant and sound having regard to the reason identified above?

- 3 Amend paragraph 2.49 as follows:

*“Options for a new access onto the A27 have been explored **with a centrally positioned roundabout identified as the appropriate access solution. This roundabout shall be** centrally located between New Monks Farm and Shoreham Airport, with a reconfigured access at Sussex Pad. The relevant parties are working with Highways England to ensure that an acceptable access solution is achieved.”*

Amendments to the Proposed Submission Adur Local Plan (2016)



Representation Form



Return Address: adurplanningpolicy@adur-worthing.gov.uk

Or:


Planning Policy Team, Adur and Worthing Councils, Town Hall, Chapel Road,
Worthing, BN11 1BR

Or hand in at:

- Shoreham Centre, 2 Pond Road, Shoreham-by-Sea, BN43 5WU or
- Portland House, 44 Richmond Road, Worthing, BN11 1HS

Please return to Adur District Council by midnight on 11th May 2016
Late representations will not be considered.

Please note that at this stage, representations are only being sought on whether the amendments to the Plan are sound and/or legally compliant.

 Use of your information: Respondent details and representations will be forwarded to the Secretary of State for consideration when the Adur Local Plan is submitted for examination. All documents will be held by Adur District Council and representations will be published including on the internet e.g. www.adur-worthing.gov.uk. Personal contact details (address, email and phone number) will be removed from published copies of representations. Your information will be handled in accordance with Data Protection Act 1998.

Contact details will be added to the Adur Planning Policy consultees database to keep you informed on the progress of the Adur Local Plan and other related documents.

Please tick if you do **not** want to be informed.

This form has two parts:

- Part A - Respondent Details. You only need to fill this in once.
- Part B - Your representation(s). Please fill in a separate sheet for each representation you make.

It is recommended that you read the Guidance Notes provided for an explanation of terms used in this form.

Part A – Personal Information
You only need to complete this section once

Personal Details

First name	<input type="text"/>	
Last name	<input type="text"/>	
Organisation (where applicable)	Albermarle (Shoreham) LLP and Longbow Investment no3 S.A.R.L	
Address line 1	C/O Agent	
Address line 2	<input type="text"/>	
Address line 3	<input type="text"/>	
Post Code	<input type="text"/>	Telephone <input type="text"/>
Email address	<input type="text"/>	

Agent's Details (if applicable)

First name	Adam	
Last name	Ross	
Organisation	Nexus Planning	
Job Title	Executive Director	
Address line 1	Nexus Planning, Suite A, 3 Weybridge Business Park	
Address line 2	Addlestone Road	
Address line 3	Weybridge	
Post Code	KT15 2BW	Telephone <input type="text"/>
Email address	<input type="text"/>	

Part B – Representation

Please use separate sheets for each representation

1. Which Amendment(s) to the Adur Local Plan does this representation relate to?

Amendments relating to:

Policy No.	<input type="text"/>	Paragraph No.	<input type="text" value="2.52"/>
Map	<input type="text"/>	Other section (please specify)	<input type="text"/>

2. Do you consider the Amendment(s) to be: (tick as appropriate)

- 2.1 Legally Compliant Yes No
- 2.2 Sound Yes No

Please read the Guidance Note for guidance on legal compliance and soundness.

If you have ticked no to 2.1, please continue to Q4.

If you have ticked no to 2.2, please continue to Q3.

If you have ticked yes to 2.1 and 2.2 please go to Q7.

3. Do you consider the Amendment(s) to the Adur Local Plan to be unsound because it is not: (tick as appropriate)

- 3.1 Positively Prepared
- 3.2 Justified
- 3.3 Effective
- 3.4 Consistent with National Policy

4. If you consider the Amendment(s) to the Adur Local Plan to be unsound or not legally compliant, please explain why in the box below:

Please see attached.

(Continue on a separate sheet if necessary)

5. Please explain in the box below what change(s) you consider necessary to make the Amendment(s) to the Adur Local Plan legally compliant and sound having regard to the reason you identified above.

(You will need to say why this change will make it legally compliant or sound. It will be helpful if you are able to put forward your suggested or revised wording. Please be as precise as possible).

Please see attached.

(Continue on separate sheet if necessary)

6. If your representation concerns soundness or legal compliance and is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination? (tick as appropriate)

No, I wish to communicate through written representations

Yes, I wish to speak to the Inspector at the hearing sessions

Please note: The Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the hearing part of the examination.

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

The amended wording of paragraph 2.52 is unclear and accordingly has potentially significant implications on the delivery of the strategic Shoreham Airport allocation. We wish to participate at the examination in order to support the effectiveness and therefore soundness of the Plan.

8. Please tick if you do not wish to be informed of the following:

- When the Plan has been submitted for Examination
- When the recommendations from the Examination have been Published
- When the Local Plan has been adopted

What happens next?

Representations made to the Council will be passed to the Inspector for consideration.

Once this has happened, the Inspector will commence the examination and give notice of the start of the hearing sessions.

Interested parties will be informed of the start date of the hearing sessions and the matters to be considered.

Thank you for your representation.

Paragraph 2.52

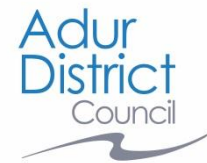
Why the Amendment(s) to the Adur Local Plan are considered to be unsound or not legally compliant?

- 1 We are unclear why the word “help” has been inserted in to paragraph 2.52. We would assume that this allocation would need to deliver, not ‘help’ to deliver, the measures necessary to mitigate its highways impacts suitably and that this was why the paragraph had been worded as it had originally. However the change is clearly very deliberate but, pending clarification from the Council on the rationale for it, we object to the inclusion of the word ‘help’ which we consider makes the paragraph more vague and therefore not effective.

What change(s) are considered necessary to make the Amendment(s) to the Adur Local Plan legally compliant and sound having regard to the reason identified above?

- 2 Pending clarification from the Council as to the rationale for the amendment, the word ‘help’ should be deleted from paragraph 2.52.

Amendments to the Proposed Submission Adur Local Plan (2016)



Representation Form



Return Address: adurplanningpolicy@adur-worthing.gov.uk

Or:


Planning Policy Team, Adur and Worthing Councils, Town Hall, Chapel Road,
Worthing, BN11 1BR

Or hand in at:

- Shoreham Centre, 2 Pond Road, Shoreham-by-Sea, BN43 5WU or
- Portland House, 44 Richmond Road, Worthing, BN11 1HS

Please return to Adur District Council by midnight on 11th May 2016
Late representations will not be considered.

Please note that at this stage, representations are only being sought on whether the amendments to the Plan are sound and/or legally compliant.

 Use of your information: Respondent details and representations will be forwarded to the Secretary of State for consideration when the Adur Local Plan is submitted for examination. All documents will be held by Adur District Council and representations will be published including on the internet e.g. www.adur-worthing.gov.uk. Personal contact details (address, email and phone number) will be removed from published copies of representations. Your information will be handled in accordance with Data Protection Act 1998.

Contact details will be added to the Adur Planning Policy consultees database to keep you informed on the progress of the Adur Local Plan and other related documents.

Please tick if you do **not** want to be informed.

This form has two parts:

- Part A - Respondent Details. You only need to fill this in once.
- Part B - Your representation(s). Please fill in a separate sheet for each representation you make.

It is recommended that you read the Guidance Notes provided for an explanation of terms used in this form.

Part A – Personal Information
You only need to complete this section once

Personal Details

First name	<input type="text"/>	
Last name	<input type="text"/>	
Organisation (where applicable)	Albermarle (Shoreham) LLP and Longbow Investment no3 S.A.R.L	
Address line 1	C/O Agent	
Address line 2	<input type="text"/>	
Address line 3	<input type="text"/>	
Post Code	<input type="text"/>	Telephone <input type="text"/>
Email address	<input type="text"/>	

Agent's Details (if applicable)

First name	Adam	
Last name	Ross	
Organisation	Nexus Planning	
Job Title	Executive Director	
Address line 1	Nexus Planning, Suite A, 3 Weybridge Business Park	
Address line 2	Addlestone Road	
Address line 3	Weybridge	
Post Code	KT15 2BW	Telephone <input type="text"/>
Email address	<input type="text"/>	

Part B – Representation

Please use separate sheets for each representation

1. Which Amendment(s) to the Adur Local Plan does this representation relate to?

Amendments relating to:

Policy No.	<input type="text"/>	Paragraph No.	<input type="text" value="2.58"/>
Map	<input type="text"/>	Other section (please specify)	<input type="text"/>

2. Do you consider the Amendment(s) to be: (tick as appropriate)

- 2.1 Legally Compliant Yes No
- 2.2 Sound Yes No

Please read the Guidance Note for guidance on legal compliance and soundness.

If you have ticked no to 2.1, please continue to Q4.

If you have ticked no to 2.2, please continue to Q3.

If you have ticked yes to 2.1 and 2.2 please go to Q7.

3. Do you consider the Amendment(s) to the Adur Local Plan to be unsound because it is not: (tick as appropriate)

- 3.1 Positively Prepared
- 3.2 Justified
- 3.3 Effective
- 3.4 Consistent with National Policy

4. If you consider the Amendment(s) to the Adur Local Plan to be unsound or not legally compliant, please explain why in the box below:

Please see attached.

(Continue on a separate sheet if necessary)

5. Please explain in the box below what change(s) you consider necessary to make the Amendment(s) to the Adur Local Plan legally compliant and sound having regard to the reason you identified above.

(You will need to say why this change will make it legally compliant or sound. It will be helpful if you are able to put forward your suggested or revised wording. Please be as precise as possible).

Please see attached.

(Continue on separate sheet if necessary)

6. If your representation concerns soundness or legal compliance and is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination? (tick as appropriate)

No, I wish to communicate through written representations

Yes, I wish to speak to the Inspector at the hearing sessions

Please note: The Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the hearing part of the examination.

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

The amended wording of paragraph 2.58 requires greater clarity in order to be effective and accordingly has potentially significant implications on the delivery of the strategic Shoreham Airport allocation. We wish to participate at the examination in order to support the effectiveness and therefore soundness of the Plan.

8. Please tick if you do not wish to be informed of the following:

- When the Plan has been submitted for Examination
- When the recommendations from the Examination have been Published
- When the Local Plan has been adopted

What happens next?

Representations made to the Council will be passed to the Inspector for consideration.

Once this has happened, the Inspector will commence the examination and give notice of the start of the hearing sessions.

Interested parties will be informed of the start date of the hearing sessions and the matters to be considered.

Thank you for your representation.

Paragraph 2.58

Why the Amendment(s) to the Adur Local Plan are considered to be unsound or legally compliant?

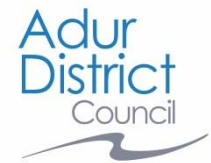
- 1 The amended text in paragraph 2.58 is supported in principle but, in accordance with the findings of the Council's Sustainability Appraisal ('the SA'), and to add clarity and therefore make this more effective, we consider that the reference to the 'new roundabout' on the A27 would benefit from greater clarity regarding its location and provision (consistent with other references in the Local Plan).

What change(s) are considered necessary to make the Amendment(s) to the Adur Local Plan legally compliant and sound having regard to the reason identified above?

- 2 Amend the second sentence of Paragraph 2.58 to state:

“The new centrally located roundabout access to be delivered by the New Monks Farm allocation, which would also provide access to the Strategic Allocation at Shoreham Airport (Policy 7), will necessitate relocation of the Withy Patch site in the locality.”

Amendments to the Proposed Submission Adur Local Plan (2016)



Representation Form



Return Address: adurplanningpolicy@adur-worthing.gov.uk

Or:


Planning Policy Team, Adur and Worthing Councils, Town Hall, Chapel Road,
Worthing, BN11 1BR

Or hand in at:

- Shoreham Centre, 2 Pond Road, Shoreham-by-Sea, BN43 5WU or
- Portland House, 44 Richmond Road, Worthing, BN11 1HS

Please return to Adur District Council by midnight on 11th May 2016
Late representations will not be considered.

Please note that at this stage, representations are only being sought on whether the amendments to the Plan are sound and/or legally compliant.

 Use of your information: Respondent details and representations will be forwarded to the Secretary of State for consideration when the Adur Local Plan is submitted for examination. All documents will be held by Adur District Council and representations will be published including on the internet e.g. www.adur-worthing.gov.uk. Personal contact details (address, email and phone number) will be removed from published copies of representations. Your information will be handled in accordance with Data Protection Act 1998.

Contact details will be added to the Adur Planning Policy consultees database to keep you informed on the progress of the Adur Local Plan and other related documents.

Please tick if you do **not** want to be informed.

This form has two parts:

- Part A - Respondent Details. You only need to fill this in once.
- Part B - Your representation(s). Please fill in a separate sheet for each representation you make.

It is recommended that you read the Guidance Notes provided for an explanation of terms used in this form.

Part A – Personal Information
You only need to complete this section once

Personal Details

First name	<input type="text"/>	
Last name	<input type="text"/>	
Organisation (where applicable)	Albermarle (Shoreham) LLP and Longbow Investment no3 S.A.R.L	
Address line 1	C/O Agent	
Address line 2	<input type="text"/>	
Address line 3	<input type="text"/>	
Post Code	<input type="text"/>	Telephone <input type="text"/>
Email address	<input type="text"/>	

Agent's Details (if applicable)

First name	Adam	
Last name	Ross	
Organisation	Nexus Planning	
Job Title	Executive Director	
Address line 1	Nexus Planning, Suite A, 3 Weybridge Business Park	
Address line 2	Addlestone Road	
Address line 3	Weybridge	
Post Code	KT15 2BW	Telephone <input type="text"/>
Email address	<input type="text"/>	

Part B – Representation

Please use separate sheets for each representation

1. Which Amendment(s) to the Adur Local Plan does this representation relate to?

Amendments relating to:

Policy No.	<input type="text" value="5"/>	Paragraph No.	<input type="text"/>
Map	<input type="text"/>	Other section (please specify)	<input type="text"/>

2. Do you consider the Amendment(s) to be: (tick as appropriate)

- 2.1 Legally Compliant Yes No
- 2.2 Sound Yes No

Please read the Guidance Note for guidance on legal compliance and soundness.

If you have ticked no to 2.1, please continue to Q4.

If you have ticked no to 2.2, please continue to Q3.

If you have ticked yes to 2.1 and 2.2 please go to Q7.

3. Do you consider the Amendment(s) to the Adur Local Plan to be unsound because it is not: (tick as appropriate)

- 3.1 Positively Prepared
- 3.2 Justified
- 3.3 Effective
- 3.4 Consistent with National Policy

4. If you consider the Amendment(s) to the Adur Local Plan to be unsound or not legally compliant, please explain why in the box below:

Please see attached.

(Continue on a separate sheet if necessary)

5. Please explain in the box below what change(s) you consider necessary to make the Amendment(s) to the Adur Local Plan legally compliant and sound having regard to the reason you identified above.

(You will need to say why this change will make it legally compliant or sound. It will be helpful if you are able to put forward your suggested or revised wording. Please be as precise as possible).

Please see attached.

(Continue on separate sheet if necessary)

6. If your representation concerns soundness or legal compliance and is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination? (tick as appropriate)

No, I wish to communicate through written representations

Yes, I wish to speak to the Inspector at the hearing sessions

Please note: The Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the hearing part of the examination.

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

The amendments made to Policy 5 require greater clarity in order to be effective and accordingly has potentially significant implications on the viability and delivery of the strategic Shoreham Airport allocation. We wish to participate at the examination in order to support the effectiveness and therefore soundness of the Plan.

8. Please tick if you do not wish to be informed of the following:

- When the Plan has been submitted for Examination
- When the recommendations from the Examination have been Published
- When the Local Plan has been adopted

What happens next?

Representations made to the Council will be passed to the Inspector for consideration.

Once this has happened, the Inspector will commence the examination and give notice of the start of the hearing sessions.

Interested parties will be informed of the start date of the hearing sessions and the matters to be considered.

Thank you for your representation.

Policy 5

Why the Amendment(s) to the Adur Local Plan are considered to be unsound or not legally compliant?

- 1 We support the strategic mixed-use allocation at New Monks Farm in principle but have a number of smaller comments to make in terms of the detail in what is a lengthy policy.

Policy 5, Paragraph 1 (Bullet Point 1)

- 2 As set out in our representations to paragraph 2.46, we support the amendment of Policy 5 to confirm that the New Monks Farm strategic allocation can accommodate 600 homes. This will ensure that the potential of this site for development is fully utilised and also, importantly, increase the value generated by this major mixed-use development. This will help to ensure that this site can viably deliver the new access on to the A27 which is required to access material levels of development within this strategic allocation. It would also (as recognised by the Council elsewhere in the Local Plan) facilitate access to the strategic employment allocation at the adjacent Shoreham Airport site allocated under Policy 7, a factor also of critical importance to the delivery of the Local Plan strategy as a whole.

Policy 5, Paragraph 1 (Bullet Point 5)

- 3 We support the amendment to this bullet point to update the reference to identify Highways England. However of much greater significance is the need to amend this bullet point to be much more specific and, importantly, reflect matters which are set out in the supporting text to Policy 5 but which are not included within Policy 5 itself.
- 4 The reference to 'suitable access on to the A27' is vague and has been made much more specific in the supporting text to the policy, with reference at paragraph 2.49 (amongst others), consistent with the conclusions of the Council's Sustainability Appraisal, to a roundabout located centrally between the New Monks Farm and Shoreham Airport strategic allocations. It is notable also that the supporting text to Policy 5 (paragraph 2.51 as amended) identifies a specific threshold by which this new roundabout access must be delivered by the New Monks Farm allocation – 250 dwellings (based presumably not only on technical highways matters but also the need to deliver the access in a timely way such that it does not delay unnecessarily the development of the strategic allocation at Shoreham Airport).

- 5 These are important issues not only for the delivery of the New Monks Farm allocation but also the adjacent strategic employment allocation at Shoreham Airport. As such it is essential that these issues are included within Policy 5 itself (which carries statutory development plan weight) and not just in the supporting text.

Policy 5, Paragraph 2

- 6 We support the inclusion of this paragraph within Policy 5 relating to the relocation of the Withy Patch Gypsy and Travellers site as a consequence of the requirement for a central single roundabout access onto the A27. Importantly, in addition to facilitating this important access provided by New Monks Farm (but serving both that allocation and that at Shoreham Airport), moving the Withy Patch Gypsy and Travellers site westwards brings a number of other benefits which include the potential to provide additional traveller pitches to meet identified needs, the ability to reduce flood risk on the site for existing and future residents, and improve facilities / future expansion facilities for the site. As such the insertion of this paragraph into Policy 5 is consistent with the findings of the Councils Sustainability Appraisal.

Policy 5, Paragraph 9 (Bullet Point 1)

- 7 We support the inclusion of this additional bullet point which states that development will be phased in order to:

“Ensure the Withy Patch Gypsy and Travellers site is relocated prior to the construction of the new roundabout access onto the A27”

- 8 This is a physical necessity in order to deliver this new but critically important access. However we consider that the wording of this bullet point would benefit from being more specific, and therefore more effective, including reference (consistent with paragraphs elsewhere in the Plan) to the central location of this new roundabout access.

What change(s) are considered necessary to make the Amendment(s) to the Adur Local Plan legally compliant and sound having regard to the reason identified above?

- 9 Amend Policy 5 as follows:

Paragraph 1 (Bullet Point 5)

“Suitable access onto the A27 by way of a centrally located roundabout in agreement with Highways England, to be delivered prior to the delivery of a maximum of 250 dwellings.”

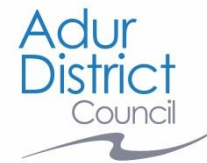
Paragraph 2

*“The Withy Patch Gypsy and Travellers site should be relocated, **to allow for the delivery of the new central roundabout access onto the A27**, and increased in size. The new site should be built at a higher level to reduce flood risk and to take the site out of Flood Zone 3. This will enable the provision of additional pitches in the future to meet identified needs.”*

Paragraph 9 (Bullet Point 1)

*“Ensure the Withy Patch Gypsy and Travellers site is relocated prior to the construction of the new **central** roundabout access onto the A27”*

Amendments to the Proposed Submission Adur Local Plan (2016)



Representation Form



Return Address: adurplanningpolicy@adur-worthing.gov.uk

Or:


Planning Policy Team, Adur and Worthing Councils, Town Hall, Chapel Road,
Worthing, BN11 1BR

Or hand in at:

- Shoreham Centre, 2 Pond Road, Shoreham-by-Sea, BN43 5WU or
- Portland House, 44 Richmond Road, Worthing, BN11 1HS

Please return to Adur District Council by midnight on 11th May 2016
Late representations will not be considered.

Please note that at this stage, representations are only being sought on whether the amendments to the Plan are sound and/or legally compliant.

 Use of your information: Respondent details and representations will be forwarded to the Secretary of State for consideration when the Adur Local Plan is submitted for examination. All documents will be held by Adur District Council and representations will be published including on the internet e.g. www.adur-worthing.gov.uk. Personal contact details (address, email and phone number) will be removed from published copies of representations. Your information will be handled in accordance with Data Protection Act 1998.

Contact details will be added to the Adur Planning Policy consultees database to keep you informed on the progress of the Adur Local Plan and other related documents.

Please tick if you do **not** want to be informed.

This form has two parts:

- i. Part A - Respondent Details. You only need to fill this in once.
- ii. Part B - Your representation(s). Please fill in a separate sheet for each representation you make.

It is recommended that you read the Guidance Notes provided for an explanation of terms used in this form.

Part A – Personal Information
You only need to complete this section once

Personal Details

First name	<input type="text"/>	
Last name	<input type="text"/>	
Organisation (where applicable)	Albermarle (Shoreham) LLP and Longbow Investment no3 S.A.R.L	
Address line 1	C/O Agent	
Address line 2	<input type="text"/>	
Address line 3	<input type="text"/>	
Post Code	<input type="text"/>	Telephone <input type="text"/>
Email address	<input type="text"/>	

Agent's Details (if applicable)

First name	Adam	
Last name	Ross	
Organisation	Nexus Planning	
Job Title	Executive Director	
Address line 1	Nexus Planning, Suite A, 3 Weybridge Business Park	
Address line 2	Addlestone Road	
Address line 3	Weybridge	
Post Code	KT15 2BW	Telephone <input type="text"/>
Email address	<input type="text"/>	

Part B – Representation

Please use separate sheets for each representation

1. Which Amendment(s) to the Adur Local Plan does this representation relate to?

Amendments relating to:

Policy No.	<input type="text"/>	Paragraph No.	<input type="text" value="2.77"/>
Map	<input type="text"/>	Other section (please specify)	<input type="text"/>

2. Do you consider the Amendment(s) to be: (tick as appropriate)

- 2.1 Legally Compliant Yes No
- 2.2 Sound Yes No

Please read the Guidance Note for guidance on legal compliance and soundness.

If you have ticked no to 2.1, please continue to Q4.

If you have ticked no to 2.2, please continue to Q3.

If you have ticked yes to 2.1 and 2.2 please go to Q7.

3. Do you consider the Amendment(s) to the Adur Local Plan to be unsound because it is not: (tick as appropriate)

- 3.1 Positively Prepared
- 3.2 Justified
- 3.3 Effective
- 3.4 Consistent with National Policy

4. If you consider the Amendment(s) to the Adur Local Plan to be unsound or not legally compliant, please explain why in the box below:

Please see attached.

(Continue on a separate sheet if necessary)

5. Please explain in the box below what change(s) you consider necessary to make the Amendment(s) to the Adur Local Plan legally compliant and sound having regard to the reason you identified above.

(You will need to say why this change will make it legally compliant or sound. It will be helpful if you are able to put forward your suggested or revised wording. Please be as precise as possible).

Please see attached.

(Continue on separate sheet if necessary)

6. If your representation concerns soundness or legal compliance and is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination? (tick as appropriate)

No, I wish to communicate through written representations

Yes, I wish to speak to the Inspector at the hearing sessions

Please note: The Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the hearing part of the examination.

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

The amended wording of paragraph 2.77 requires greater clarity in order to be effective and accordingly has potentially significant implications on the delivery of the strategic Shoreham Airport allocation. We wish to participate at the examination in order to support the effectiveness and therefore soundness of the Plan.

8. Please tick if you do not wish to be informed of the following:

- When the Plan has been submitted for Examination
- When the recommendations from the Examination have been Published
- When the Local Plan has been adopted

What happens next?

Representations made to the Council will be passed to the Inspector for consideration.

Once this has happened, the Inspector will commence the examination and give notice of the start of the hearing sessions.

Interested parties will be informed of the start date of the hearing sessions and the matters to be considered.

Thank you for your representation.

Paragraph 2.77

Why the Amendment(s) to the Adur Local Plan are considered to be unsound or not legally compliant?

- 1 We fully support the amendments to paragraph 2.77 which make it clear that improved access from the A27 (and specifically the new junction with the A27) is something required as a result of the amount of new development proposed at the adjacent New Monks Farm allocation. We also fully support the clarity that this access, whilst required and provided by the New Monks Farm strategic allocation, would also serve the strategic allocation at Shoreham Airport.
- 2 We also support the amendment to the paragraph which would clarify that this access solution will be a new roundabout, and that it will be sited in a central location between the two strategic sites. As referenced by paragraph 12.3.3 of the Council's Sustainability Appraisal, this centrally positioned roundabout has previously been accepted by the promoters of New Monks Farm and Shoreham Airport. Furthermore, as set out in the technical note produced by JMP (originally submitted in December 2015 but updated and provided for ease of reference – see **Appendix 1**), this is a wholly appropriate location from a technical perspective.
- 3 However we consider that the clarity of this paragraph could be added to by a further slight amendment which would make the references even more definitive and specific (consistent with the Council's Sustainability Appraisal conclusions) and, in turn, make the paragraph more effective.

What change(s) are considered necessary to make the Amendment(s) to the Adur Local Plan legally compliant and sound having regard to the reason identified above?

- 4 Amend paragraph 2.77 to state:

*“New development at the Airport will result in a need for improved access from the A27; given that the amount of development proposed at New Monks Farm requires a new junction onto the A27, it is intended that this will also serve new development at the Airport. The site for **the** proposed roundabout **shall** be centrally located between New*

Monks Farm and Shoreham Airport, with a reconfigured access at Sussex Pad. The relevant parties are working with Highways England to ensure that an acceptable access solution is achieved.”

Appendix 1 - Technical Note

Date 4 May 2016 **Job No** ST16450

Present **Subject** Shoreham Airport Local Plan
Amendments Representation -
Transport and Highways

File Note

1 Introduction

- 1.1 JMP Consultants Ltd have been commissioned to provide technical transport and highways advice for the consultation on the Amendments to the New Monks Farm/Shoreham Airport allocation for the Amendments to Proposed Submission Adur Local Plan 2016. The site is located to the east of Lancing and the west of Shoreham-by-Sea, directly to the south of the A27. The A27 is part of the strategic route network (SRN) managed by Highways England.
- 1.2 This document will focus on the amendments proposed in respect of the access and provide technical transport and highways advice supporting the proposals within the Amendments consultation.

2 Location of access point

- 2.1 The location of the preferred site access onto the A27 as included in the Amendments to Proposed Submission Adur Local Plan 2016 is central to the New Monks Farm/Shoreham Airport site allocations. An access from the A27 in this location is well located to serve both the Monks Farm development allocation and the Shoreham Airport site and employment allocation.
- 2.2 The access in this location is supported as being the most appropriate location for an access which satisfies technical criteria and meets the objective of serving both sites and their future development.
- 2.3 The feasibility of providing an access in along the shared boundary of the Monks Farm allocation and Shoreham Airport is assessed below together with the benefits that will result from the location.
- 2.4 The principle of providing an access in this location, which enables one junction to serve both the New Monks Farm allocation and Shoreham Airport is supported. This would better serve the requirements of both sites in addition to other stakeholders in the area and provide highway benefits. The provision of a single access also provides the opportunity to stop up existing substandard accesses to the site and does not prejudice the aspiration of reconfiguring the Sussex Pad junction.
- 2.5 The preferred location for a proposed roundabout will enable traffic from both developments to be considered in an efficient manner, achieve a suitable spacing between other junctions (such as Marsh Barn Lane, the layby and Grinstead Lane) and would not prejudice the provision of infrastructure and crossings for pedestrians, cyclists and equestrians. The location would also enable a reconfigured Sussex Pad junction to be designed in accordance with it.
- 2.6 It is also important to note that the provision of one access point to serve both sites results in highway safety benefits and is supported. An access point which is not located between the two site allocations would result in traffic movements from one of the development sites having to route through the other development site. For example if the access were to be provided west of the preferred location (primarily serving Monks Farm, which is predominantly residential in nature) this would result in vehicle movements for Shoreham Airport (which will be industrial, commercial and employment uses) having to route through the residential allocation. This could have a detrimental impact on the layout of the Monks Farms site, the highway hierarchy, the efficient use of development land and residential amenity. Supporting justification is set out below.

3 Rationalisation of access points

- 3.1 The majority of road accidents occur at or near junctions. The rationalisation of multiple access points for the sites on the A27 to a single access will improve highway safety due to a reduction in conflicting movements

Date 4 May 2016 **Job No** ST16450

Present **Subject** Shoreham Airport Local Plan
Amendments Representation -
Transport and Highways

File Note

between road users. Generally, the fewer accesses, the fewer points where vehicles are crossing the carriageway and reduced conflicts.

- 3.2 Existing accesses to the sites from the A27 exist currently. These accesses are substandard and would not be suitable to accommodate development on the sites.
- 3.3 A single access serving the development sites and allocations at both New Monks Farm and Shoreham Airport will be safer in highways terms than two relatively close separate accesses for each of the developments.
- 3.4 The provision of one access point instead of two would also have less of a detrimental effect on the capacity of the A27 with fewer interruptions to the free flow of traffic on the main carriageway of the A27.
- 3.5 The provision of a single access provides the opportunity to stop up and remove existing access points which are substandard, providing a further safety benefit.

4 Provision of a new access point

- 4.1 The form and scale of the junction has been assessed at a 'high, indicative' level. JMP Drawing ST16450-06 shows an outline of the land required to provide a new roundabout serving both the New Monks Farm allocation and Shoreham Airport in this location. This includes an estimate of land required for construction and earthworks. Assessing the design requirements for a new access junction demonstrate that it would be necessary to use land from both the Monks Farm site allocation and the Shoreham Airport site in order to achieve maximum highway benefit. This is the most appropriate location for an access onto the A27 to serve both sites.
- 4.2 The indicative landtake outline is based on the provision of a junction designed in accordance with the Design Manual for Roads and Bridges (IDMRB) standard in TD 16-07 Geometric Design of Roundabouts. These design standards would be applied to the A27, as part of the SRN
- 4.3 An access junction designed in accordance with national design standards for the strategic road network would be suitable to accommodate the vehicle movements associated with the development allocations. It is also considered at this preliminary stage that the access junction would be sufficient to accommodate the existing traffic flows on the A27, future growth noted in the DfT's A27 Corridor Feasibility Study (which also identifies highway improvements being made elsewhere on the corridor) and vehicle movement/trip generation from the two development sites.
- 4.4 The junction would be designed to facilitate all movements and the provision of a new access in this location would not prejudice the provision of any reconfigured access at Sussex Pad. The proposals outlined within the emerging Local Plan are to remove the traffic signal controlled junction in this location and to replace with left in, left out access arrangements (including at Old Shoreham Road).
- 4.5 A roundabout junction on the A27 could deliver all movement access to the Airport, effectively replacing some of the movements at the Sussex Pad junction. The left in, left out arrangement in isolation would not be suitable to accommodate existing traffic flows using Old Shoreham Road and the employment allocation at Shoreham Airport; therefore presenting further justification for an all movement roundabout junction to serve both Monks Farm allocation and Shoreham Airport.
- 4.6 The location of the access centrally between the sites ensures an appropriate spacing between existing junctions (such as the A2025, Grinstead Lane) to ensure highway safety benefits. The Sussex Pad junction will be reconfigured to a left in-left out arrangements to further benefit highway safety.

Date 4 May 2016 **Job No** ST16450

Present **Subject** Shoreham Airport Local Plan
Amendments Representation -
Transport and Highways

File Note

5 Conclusions

5.1 In conclusion, the preferred access location centrally between the sites is supported as being the most appropriate location for a new access onto the A27; it is considered beneficial in highway terms for the following reasons:

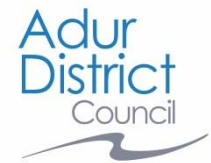
- It would serve allocations and future developments at both New Monks Farm and Shoreham Airport and allow for the provision of one combined access rather than two separate ones, this is the most efficient way to serve both sites and avoids a proliferation of access points. There would not be sufficient spacing to enable two separate access points for each site to be provided on the A27;
- The provision of a single access would benefit the A27 in terms of both highway safety and capacity and enable the removal of substandard existing site accesses;
- An access located centrally between both sites will assist in ensuring that internal site layouts can be designed with the appropriate highway hierarchy and avoid the need for vehicle movements from one site having to route through another resulting in an inefficient use of land for development;
- The roundabout access junction can be designed to avoid the relocated Withy Patch if land from Shoreham Airport is incorporated and any relocation does not materialise;
- A centrally located access can be designed to facilitate movements for pedestrians, cyclists and equestrians efficiently;
- An indicative landtake outline for a roundabout has been produced which shows a junction can be accommodated in accordance with national design standards in DMRB which minimises the impact on landscape; and

A centrally located roundabout can deliver all movement access to the Airport, reducing the demand at the Sussex Pad junction (including the aspiration to reconfigure this junction to remove the signals and provide a left in, left out arrangement – this aspiration is not prejudiced by any roundabout access).

Distribution

Name/ Signed

Amendments to the Proposed Submission Adur Local Plan (2016)



Representation Form



Return Address: adurplanningpolicy@adur-worthing.gov.uk

Or:


Planning Policy Team, Adur and Worthing Councils, Town Hall, Chapel Road,
Worthing, BN11 1BR

Or hand in at:

- Shoreham Centre, 2 Pond Road, Shoreham-by-Sea, BN43 5WU or
- Portland House, 44 Richmond Road, Worthing, BN11 1HS

Please return to Adur District Council by midnight on 11th May 2016
Late representations will not be considered.

Please note that at this stage, representations are only being sought on whether the amendments to the Plan are sound and/or legally compliant.

 Use of your information: Respondent details and representations will be forwarded to the Secretary of State for consideration when the Adur Local Plan is submitted for examination. All documents will be held by Adur District Council and representations will be published including on the internet e.g. www.adur-worthing.gov.uk. Personal contact details (address, email and phone number) will be removed from published copies of representations. Your information will be handled in accordance with Data Protection Act 1998.

Contact details will be added to the Adur Planning Policy consultees database to keep you informed on the progress of the Adur Local Plan and other related documents.

Please tick if you do **not** want to be informed.

This form has two parts:

- Part A - Respondent Details. You only need to fill this in once.
- Part B - Your representation(s). Please fill in a separate sheet for each representation you make.

It is recommended that you read the Guidance Notes provided for an explanation of terms used in this form.

Part A – Personal Information
You only need to complete this section once

Personal Details

First name	<input type="text"/>	
Last name	<input type="text"/>	
Organisation (where applicable)	Albermarle (Shoreham) LLP and Longbow Investment no3 S.A.R.L	
Address line 1	C/O Agent	
Address line 2	<input type="text"/>	
Address line 3	<input type="text"/>	
Post Code	<input type="text"/>	Telephone <input type="text"/>
Email address	<input type="text"/>	

Agent's Details (if applicable)

First name	Adam	
Last name	Ross	
Organisation	Nexus Planning	
Job Title	Executive Director	
Address line 1	Nexus Planning, Suite A, 3 Weybridge Business Park	
Address line 2	Addlestone Road	
Address line 3	Weybridge	
Post Code	KT15 2BW	Telephone <input type="text"/>
Email address	<input type="text"/>	

Part B – Representation

Please use separate sheets for each representation

1. Which Amendment(s) to the Adur Local Plan does this representation relate to?

Amendments relating to:

Policy No.	<input type="text" value="7"/>	Paragraph No.	<input type="text"/>
Map	<input type="text"/>	Other section (please specify)	<input type="text"/>

2. Do you consider the Amendment(s) to be: (tick as appropriate)

- 2.1 Legally Compliant Yes No
- 2.2 Sound Yes No

Please read the Guidance Note for guidance on legal compliance and soundness.

If you have ticked no to 2.1, please continue to Q4.

If you have ticked no to 2.2, please continue to Q3.

If you have ticked yes to 2.1 and 2.2 please go to Q7.

3. Do you consider the Amendment(s) to the Adur Local Plan to be unsound because it is not: (tick as appropriate)

- 3.1 Positively Prepared
- 3.2 Justified
- 3.3 Effective
- 3.4 Consistent with National Policy

4. If you consider the Amendment(s) to the Adur Local Plan to be unsound or not legally compliant, please explain why in the box below:

Please see attached.

(Continue on a separate sheet if necessary)

5. Please explain in the box below what change(s) you consider necessary to make the Amendment(s) to the Adur Local Plan legally compliant and sound having regard to the reason you identified above.

(You will need to say why this change will make it legally compliant or sound. It will be helpful if you are able to put forward your suggested or revised wording. Please be as precise as possible).

Please see attached.

(Continue on separate sheet if necessary)

6. If your representation concerns soundness or legal compliance and is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination? (tick as appropriate)

No, I wish to communicate through written representations

Yes, I wish to speak to the Inspector at the hearing sessions

Please note: The Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the hearing part of the examination.

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

The amendments made to Policy 7 require greater clarity in order to be effective and accordingly there are potentially significant implications on the viability and delivery of the strategic Shoreham Airport allocation. We wish to participate at the examination in order to support the effectiveness and therefore soundness of the Plan.

8. Please tick if you do not wish to be informed of the following:

- When the Plan has been submitted for Examination
- When the recommendations from the Examination have been Published
- When the Local Plan has been adopted

What happens next?

Representations made to the Council will be passed to the Inspector for consideration.

Once this has happened, the Inspector will commence the examination and give notice of the start of the hearing sessions.

Interested parties will be informed of the start date of the hearing sessions and the matters to be considered.

Thank you for your representation.

Policy 7

Why the Amendment(s) to the Adur Local Plan are considered to be unsound or not legally compliant?

- 1 We support Policy 7 in principle and our comments relate more to matters of detail which, although small, are important to the delivery of the allocation and the effectiveness of the policy.
- 2 For the avoidance of doubt, reference to “paragraph” within the below representation refers to the paragraphs (which are not numbered) within the Policy text itself.

Policy 7

- 3 As set out in our previous representations, the Local Plan identifies that the first ‘Key Issue’ for the District in the period to 2031 is the need to diversify the economy, safeguard employment sites and provide more opportunities for businesses to locate into or expand in Adur. In this regard it makes specific reference to the Shoreham Airport site. The Council’s strategy in this regard of course expands upon the ‘Greater Brighton City Deal’ which seeks to prioritise economic growth in order to support the delivery of the Coast to Capital LEP’s Growth Strategy – a strategy which specifically identifies the Shoreham Airport site as being key to its success (paragraph 2.38 of the Local Plan refers).
- 4 The Council (and the LEP) is therefore clear not only that the Shoreham Airport site is central to its strategy for the District but also, as set out in Policy 5, that the delivery of the Shoreham Airport and adjacent New Monks Farm strategic sites are mutually dependent. The clearest example of this recognised inter-relationship is the Council’s confirmation of the need for the New Monks Farm site to deliver the single central access from the A27 that would also serve the Shoreham Airport site.
- 5 In light of the above it is essential that Policy 5 (and Policy 7) recognises the inter-relationship between these key sites to ensure that both are delivered in a timely and viable way. It is essential that neither site comes forward in a way that would prejudice the other and, furthermore, that each site is actively brought forward having regard to the delivery of the other.

Policy 7, Paragraph 1

- 6 The addition of “hangar” uses within the first paragraph of Policy 7 is fully supported. This adds further to the variety of employment-generating uses that are permitted in this key location.

Policy 7, Paragraph 6

- 7 We support the intention for development to deliver ecological enhancements where this is possible. However the objective as set out at paragraph 109 of the National Planning Policy Framework (NPPF) is to secure net ecological gains ‘where possible’. The revised policy wording pre-supposes that such enhancements can definitively be delivered, prior to a scheme being proposed.
- 8 Whilst it is likely that such ecological enhancements could be delivered, this paragraph should be amended to accord national planning policy.

Policy 7, Paragraph 9

- 9 Policy 7, paragraph 9 as amended seeks to limit development in airside locations to aviation-related employment uses, whilst non-airside locations are identified as suitable for non-aviation related employment uses provided that it can be demonstrated that these non-aviation related uses would not impact the operational viability of the Airport.
- 10 We support the approach to non-airside locations, which maximises flexibility on this strategically important site and, therefore, maximises the potential to deliver the new employment opportunities on this strategically employment allocation. However we consider that the policy, insofar as it does not afford this same flexibility to airside locations, is unnecessarily constraining and therefore has the potential to prevent much-needed employment development. Moreover, this current absence of flexibility for airside locations does not appear to be evidenced and therefore would be unjustified.
- 11 Accordingly we consider that this part of Policy 7 should address airside and non-airside locations in the same way – allowing aviation related employment uses but also allowing non-aviation employment where it can be demonstrated that it would not impact on the operational viability of the Airport. This would make the policy more effective, ensuring that the operation of the Airport is protected whilst also ensuring that opportunities for employment development are maximised.

Policy 7, Paragraph 10

- 12 We support the inclusion of reference to infrastructure requirements being addressed through Section 106 / planning conditions as appropriate. Whilst to an extent it goes without saying, we also consider that the clarity of the policy would be assisted by the inclusion of the words 'subject to viability'.
- 13 As the Council is aware, the employment development proposed at Shoreham Airport, whilst important strategically, is not a significant generator of development value. This was identified in representations submitted by Savills in November 2013 which identified, with reference to viability assessment work, that the proposed development at Shoreham Airport was not financially viable if it was required to fund significant improvements to the A27.
- 14 Against that background we consider that it would add to the clarity and effectiveness of the policy if reference was made to viability.

What change(s) are considered necessary to make the Amendment(s) to the Adur Local Plan legally compliant and sound having regard to the reason identified above?

- 15 Amend Policy 7 as follows:

New paragraph into Policy 7 after existing paragraph 2

“Development of this allocated site must not prejudice, and should be planned and delivered in a way that actively seeks to recognise / facilitate, the development of the adjacent strategic allocation at New Monks Farm (Policy 5)”

Paragraph 6

*“**Where possible**, ecological enhancements should be incorporated as an integral part of the development.”*

Paragraph 9

“Within the existing developed area located at the southern end of the Airport, airside and non-airside locations will be protected and supported for aviation-related and non-aviation

related B1, B2 and B8/hangar uses, with non-aviation uses allowed only where it can be demonstrated that such use will not impact the operational viability of the Airport.”

Paragraph 10

*“Infrastructure requirements are to be addressed, **subject to viability**, through s106 / planning conditions as appropriate.”*