

James Appleton  
Adur District Council  
Planning and Development Services  
Civic Centre Ham Road  
Shoreham-by-Sea  
West Sussex  
BN43 6PR

Date: 10 May 2016

Dear James and the Planning Policy Team

### **Amendments to the Proposed Submission Adur Local Plan (2016)**

Thank you for the opportunity to comment on your Amendments to the Proposed Submission Local Plan (2016). We are pleased that the work that we have done with you over the last few years has been reflected in the Plan and overall we are supportive of it.

Due to these latest amendments, we are able to withdraw the following 4 previous Unsound Representations: Policy 6 - Land at West Sompting; Policy 8 - Shoreham Harbour; Policy 19 Sustainable Design and Policy 24 – Provision for Gypsies, Travellers and Travelling Showpeople.

Attached to this letter is one Unsound Representation - Paragraph 2.54A in Part 2 (referring to sewerage provision). This paragraph has been added as part of these latest amendments. We have recommended wording changes that would overcome our concerns. We hope that you will be able to take this on board as you progress to Submission and Examination.

In addition to the above, we have a few minor points for your information as follows:

#### Part 4

- Page 138 Paragraph 4.130. Last sentence – the indicative completion date for the Shoreham Adur Tidal Walls scheme is 2018 **and not** 2017. This seems to have been updated / corrected in other parts of the documents.

#### Infrastructure Delivery Plan

- Page 34. Planned Provision. The italic bold and strikethrough amendments that we have added to your text below provides the current situation with the Shoreham Adur Tidal Walls project. Again, the current situation with this project has been updated / corrected in other parts of the documents.

“The Environment Agency **has produced plans** ~~is currently working on plans~~ for improvements to the Shoreham Adur Tidal Walls on both the east and west sides of the River. The scheme is separated into 10 reaches, or lengths of the estuarine bank stretching from the river mouth and the A27 on the west bank, and Coronation Green to the A27 road bridge on the east bank .....Construction is **due expected** to begin in Spring 2016.”

Environment Agency  
Guildbourne House, Chatsworth Road, Worthing, West Sussex, BN11 1LD.  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)  
Cont/d..

- Page 67/68. Planned Provision. Teville Stream. Since this was written, some further work has been carried out. There are now only 2 phases to the proposals. The following text below (which combines and updates the first 2 paragraphs on Page 68) provides the latest situation:

“The EA has been investigating potential options to improve the stream to restore it to its natural state where possible. Two sections of the stream have been considered. Phase 1 is the stream restoration North of the Railway line and is located in Adur and Phase 2 which is Brooklands Lake habitat improvements is located in Worthing. Phase 1 has completed detailed designs and gained planning permission. It involves the restoration and rerouting of the Teville Stream. It will deliver ecological enhancements to meet legislative requirements of the Water Framework Directive as well as improving community access to the natural surroundings and improve green infrastructure. Phase 2 has looked at options for habitat improvements to the lake for future consideration.”

If you wish to discuss any aspects of our representation in more detail, please do not hesitate to contact me.

**Marguerite Oxley**  
**Sustainable Places Technical Specialist**

**Direct dial:** [REDACTED]

**Direct email:** [REDACTED]

# Amendments to the Proposed Submission Adur Local Plan (2016)



## Representation Form



Return Address: [adurplanningpolicy@adur-worthing.gov.uk](mailto: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 11<sup>th</sup> 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](http://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.

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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" value="Marguerite"/>		
Last name	<input type="text" value="Oxley"/>		
Organisation (where applicable)	<input type="text" value="Environment Agency"/>		
Address line 1	<input type="text" value="Guildbourne House"/>		
Address line 2	<input type="text" value="Chatsworth Road"/>		
Address line 3	<input type="text" value="Worthing"/>		
Post Code	<input type="text" value="BN11 1LD"/>	Telephone	<input type="text" value=""/>
Email address	<input type="text" value=""/>		

**Agent's Details** (if applicable)

First name	<input type="text"/>		
Last name	<input type="text"/>		
Organisation	<input type="text"/>		
Job Title	<input type="text"/>		
Address line 1	<input type="text"/>		
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"/>		

## 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.

Paragraph No.

2.54A Part 2

Map

Other section  
(please specify)

### 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:**

We support the following wording in Policy 5 “The development is to be connected to sewerage and water distribution networks at the nearest points of adequate capacity, as agreed with Southern Water”. We support that the New Monks Farm development should be connected to the mains sewerage system.

However, the wording in paragraph 2.54A below does not appear to be fully effective in delivering this part of Policy 5. The wording does not emphasise that all mains sewerage connection possibilities should be fully considered in the first instance.

“2.54A Wastewater from the new development will be expected to drain to a public sewer. If this is not feasible (following discussions with Southern Water Services and the Environment Agency) and there is evidence that there is no alternative available to provide a connection to the public sewerage network, the advice in paragraph 020 of the National Planning Practice Guidance should be followed. The operation of and future management of any sewerage treatment plant should be set out clearly in any planning application for the development of the site.”

(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).**

We support the following wording in Policy 5 “The development is to be connected to sewerage and water distribution networks at the nearest points of adequate capacity, as agreed with Southern Water”. We support that the New Monks Farm development should be connected to the mains sewerage system.

We would suggest rewording paragraph 2.54A as follows:

“Wastewater from the new development will be expected to drain to a public sewer. If this is not feasible (following discussions with Southern Water Services and the Environment Agency) and there is evidence that all options for connection to the public sewerage network have been fully explored, the advice set out in paragraph 020 of the National Planning Practice Guidance should be followed. The operation and future management of any alternative sewerage scheme should be set out clearly in any planning application for development of the site.”

We request this change to make sure that all mains sewerage connection possibilities are fully considered in any planning application for this site in the first instance.

The words “sewerage treatment plant” in the last sentence of paragraph 2.54A are prescriptive. Using the term “alternative sewerage scheme” instead of “sewerage treatment plant” does not restrict the scope of potential sewerage options.



(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.**

**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.**