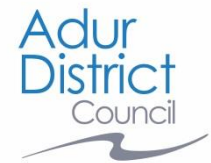


# Amendments to the Proposed Submission Adur Local Plan (2016)



## 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.

---

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	Martin		
Last name	Perry		
Organisation (where applicable)	New Monks Farm Development Ltd.		
Address line 1	The American Express Community Stadium		
Address line 2	Village Way		
Address line 3	Falmer		
Post Code	BN1 9BL	Telephone	
Email address			

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

First name	Peter		
Last name	Rainier		
Organisation	DMH Stallard LLP		
Job Title	Director		
Address line 1	Gainsborough House		
Address line 2	Pegler Way		
Address line 3	Crawley		
Post Code	RH11 7FZ	Telephone	
Email address			

## 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.

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:**

It is considered that Policy 2 is legally compliant and sound. The release of New Monks Farm to provide a mixed use development is consistent with the NPPF which requires Local Planning Authorities to plan pro-actively to meet housing, business and other development needs of an area.

The allocation of the site for a variety of uses (including housing, employment, open space and education) is also consistent with Paragraph 14 of the NPPF, which indicates that Local Planning Authorities should promote mixed use developments and encourage multiple benefits from the use of land in urban and rural areas.

(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).**

N/A

(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.**

We act on behalf of New Monks Farm Development Ltd. who own the land proposed to be allocated at New Monks Farm. It is considered that the Inspector will want to query and discuss the delivery of the above allocation with the landowners and members of their consultant team.

**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?**

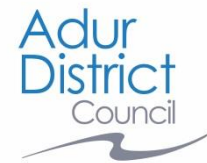
Representations made to the Council will be passed to the Inspector for consideration.

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.**

# 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.

---

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	Martin		
Last name	Perry		
Organisation (where applicable)	New Monks Farm Development Ltd.		
Address line 1	The American Express Community Stadium		
Address line 2	Village Way		
Address line 3	Falmer		
Post Code	BN1 9BL	Telephone	
Email address			

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

First name	Peter		
Last name	Rainier		
Organisation	DMH Stallard LLP		
Job Title	Director		
Address line 1	Gainsborough House		
Address line 2	Pegler Way		
Address line 3	Crawley		
Post Code	RH11 7FZ	Telephone	
Email address			

## 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.

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:**

It is considered that Policy 3 is legally compliant and sound. We note that Paragraph 2.22 of the Proposed Submission Local Plan (as amended) indicates that when assessed against Adur's objectively assessed needs, the amount of residential development that can be accommodated on brownfield sites results in a considerable shortfall of 3,291 dwellings.

Consequently, the release of New Monks Farm (as well land at Sompting and Shoreham Harbour) is essential to partially make up this shortfall, although it is noted that there would still be an under delivery of 2,211 dwellings during the plan period. However, in acknowledgement of the considerable environmental constraints within the District a capacity based approach would in our view be appropriate. Should the Inspector seek to suspend the Plan so that the shortfall can be further addressed, we would welcome a preliminary statement from the Inspector indicating support for the allocation of land at New Monks Farm thus enabling delivery.

(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).**

N/A

(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.**

We act on behalf of New Monks Farm Development Ltd. who own the land proposed to be allocated at New Monks Farm. It is considered that the Inspector will want to query and discuss the delivery of the above allocation with the landowners and members of their consultant team.

**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?**

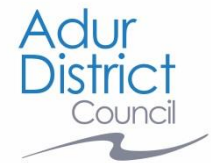
Representations made to the Council will be passed to the Inspector for consideration.

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.**

# 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.

---

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	Martin		
Last name	Perry		
Organisation (where applicable)	New Monks Farm Development Ltd.		
Address line 1	The American Express Community Stadium		
Address line 2	Village Way		
Address line 3	Falmer		
Post Code	BN1 9BL	Telephone	
Email address			

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

First name	Peter		
Last name	Rainier		
Organisation	DMH Stallard LLP		
Job Title	Director		
Address line 1	Gainsborough House		
Address line 2	Pegler Way		
Address line 3	Crawley		
Post Code	RH11 7FZ	Telephone	██████████
Email address	██		



## 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="2.43 to 2.44"/>
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:**

It is considered that Paragraphs 2.43 – 2.44 are sound as they provide a flexible approach to employment provision. The types of employment generating uses supported at New Monks Farm via the wording “appropriate employment generating uses” is considered to be sufficiently flexible in regards to the form of employment floorspace that will be considered acceptable by the Local Planning Authority.

Paragraph 2.43 recognises the importance of delivering a mixed local economy which could in addition to commercial uses, include retail, leisure and service economies. This flexibility is acknowledged and supported.

Paragraph 2.44 then goes on to state that New Monks Farm will deliver appropriate employment generating uses.

It is considered that in order for New Monks Farm to be viable and deliverable significant flexibility is provided for the type of employment uses considered suitable (as supported by Paragraph 2.43 of the Local Plan). This is in line with Paragraph 21 of the NPPF which states that policies should be flexible enough to accommodate needs not anticipated in the plan and to allow rapid responses to a change in economic circumstances.

(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).**

(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.**

We act on behalf of New Monks Farm Development Ltd. who own the land proposed to be allocated at New Monks Farm. It is considered that the Inspector will want to query and discuss the delivery of the above allocation with the landowners and members of their consultant team.

**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?**

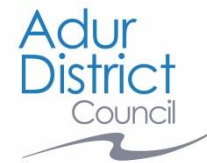
Representations made to the Council will be passed to the Inspector for consideration.

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.**

# 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.

---

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	Martin		
Last name	Perry		
Organisation (where applicable)	New Monks Farm Development Ltd.		
Address line 1	The American Express Community Stadium		
Address line 2	Village Way		
Address line 3	Falmer		
Post Code	BN1 9BL	Telephone	
Email address			

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

First name	Peter		
Last name	Rainier		
Organisation	DMH Stallard LLP		
Job Title	Director		
Address line 1	Gainsborough House		
Address line 2	Pegler Way		
Address line 3	Crawley		
Post Code	RH11 7FZ	Telephone	
Email address			

## 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.

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:**

The Respondent considers that in order to be viable the level and type of employment floorspace should be as flexible as possible in order to ensure delivery. The delivery of the allocation will require significant investment in infrastructure, principally in respect of the proposed roundabout from the A27 but also in respect of flood mitigation works. Therefore, it is considered that the 'appropriate employment provision' should be given a very broad definition as would be consistent with Paragraph 21 of the NPPF which states that Local Planning Authorities should:

*"support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances;"*

It is considered that the wording of the Policy is sound as it does not seek to be prescriptive regarding specific uses, allowing a flexible range of employment generating uses.

It is considered that setting a maximum limit on the amount of employment generating floorspace at New Monks Farm is too restrictive and not positively prepared. In order that the Council can satisfy themselves that at least 10,000 m2 of employment generating space will be provided at New Monks Farm this level should be referred to as a minimum. Clearly, should any future developer seek to provide an increased level of floorspace, such provision should be treated positively, provided that it complies with other policies within the ADLP, as well as guidance provided within the NPPF.

From the viability appraisals carried out by the Respondent, it is our view that the above amendment to the Local Plan are important to make the New Monks Farm allocation viable and deliverable.

(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).**

The Policy should be amended as follows:

*“To facilitate regeneration and ensure a sustainable economy, a **minimum** of approximately 41,000 square metres of **floorspace** will be allocated for appropriate employment generating uses in Adur up to 2031 at the following locations:*

- *Shoreham Airport (15,000 sqm)*
- *New Monks Farm (**at least** 10,000sqm)*
- *Shoreham Harbour Regeneration Area (16,000 sqm within Adur)*

*These allocations will provide a range of employment sites in terms of locations and sizes, and provision will be made within these allocations for a range of accommodation types”*

It is considered that the above amendment is necessary to provide sufficient flexibility to aid the viability and deliverability of the New Monks Farm allocation, particularly in relation to highway and flood infrastructure works.

(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.**

We act on behalf of New Monks Farm Development Ltd. who own the land proposed to be allocated at New Monks Farm. It is considered that the Inspector will want to query and discuss the delivery of the above allocation with the landowners and members of their consultant team.

**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?**

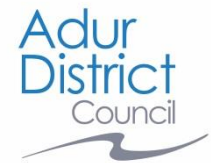
Representations made to the Council will be passed to the Inspector for consideration.

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.**

# 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.

---

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	Martin		
Last name	Perry		
Organisation (where applicable)	New Monks Farm Development Ltd.		
Address line 1	The American Express Community Stadium		
Address line 2	Village Way		
Address line 3	Falmer		
Post Code	BN1 9BL	Telephone	
Email address			

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

First name	Peter		
Last name	Rainier		
Organisation	DMH Stallard LLP		
Job Title	Director		
Address line 1	Gainsborough House		
Address line 2	Pegler Way		
Address line 3	Crawley		
Post Code	RH11 7FZ	Telephone	
Email address			

## 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.

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:**

It is considered that at present paragraphs 2.49 and 2.77 are not sound as they fail to provide the most effective solution to the delivery of the New Monks Farm allocation.

The design of the roundabout is currently being progressed based on a number of constraints, including highway constraints, and constraints presented by natural features including Honeyman's Hole (a spring adjacent to the A27) and an Ancient Monument. Consequently, it needs to be made clear that the location of the roundabout is sufficiently flexible in order that the best solution can be provided taking into account those constraints. It is noted that the Proposals Map and related Map 2 (New Monks Farm) identifies the location of the roundabout as indicative, but the flexibility of its location is not appropriately picked up within the two above Paragraphs.

(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).**

Paragraph 2.49 should be amended as follows:

“The preferred site for a proposed roundabout is 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, **with the recognition that flexibility is required as to the final precise location and design.**”

Paragraph 2.77 should be amended as follows:

“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 preferred site for a proposed roundabout is centrally located between New Monks Farm and Shoreham Airport, with a reconfigured access at Sussex Pad. The relevant parties are working with the Highways England to ensure that an acceptable access solution is achieved, **with the recognition that flexibility is required as to the final precise location and design.**”

It is considered that the above amendments are necessary to provide flexibility and to ensure the most effective solution for the roundabout is found in light of various constraints.

(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.**

We act on behalf of New Monks Farm Development Ltd. who own the land proposed to be allocated at New Monks Farm. It is considered that the Inspector will want to query and discuss the delivery of the above allocation with the landowners and members of their consultant team.

**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?**

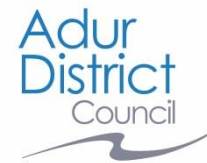
Representations made to the Council will be passed to the Inspector for consideration.

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.**

# 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.

---

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	Martin		
Last name	Perry		
Organisation (where applicable)	New Monks Farm Development Ltd.		
Address line 1	The American Express Community Stadium		
Address line 2	Village Way		
Address line 3	Falmer		
Post Code	BN1 9BL	Telephone	
Email address			

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

First name	Peter		
Last name	Rainier		
Organisation	DMH Stallard LLP		
Job Title	Director		
Address line 1	Gainsborough House		
Address line 2	Pegler Way		
Address line 3	Crawley		
Post Code	RH11 7FZ	Telephone	
Email address			

## 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.

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:**

Paragraph 2.53 refers to the Lancing Surface Water Management Plan (LSWMP) 2015. The LWSMP is not finalised and therefore reference to the 2015 version is not appropriate. It is considered necessary to make reference to the LSWMP and omit the date, as set out in Policy 5.

It is considered that Paragraph 2.54A is not effective nor is it positively prepared. The paragraph should provide more flexibility in order that there is equal preference for either connection to the public sewer system or alternatively provision of a package sewerage treatment plant.

(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).**

Paragraph 2.53 should be revised to omit reference to (2015) and refer simply to the LSWMP.

It is considered that Paragraph 2.54A should be amended as follows:

*“Wastewater from the new development will be expected to drain **either** to a public sewer, **or to a sewerage treatment plant**. **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 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.**

We act on behalf of New Monks Farm Development Ltd who own the land proposed to be allocated at New Monks Farm. It is considered that the Inspector will want to query and discuss the delivery of the above allocation with the landowners and members of their consultant team.

**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?**

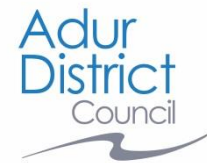
Representations made to the Council will be passed to the Inspector for consideration.

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.**

# 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.

---

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	Martin		
Last name	Perry		
Organisation (where applicable)	New Monks Farm Development Ltd.		
Address line 1	The American Express Community Stadium		
Address line 2	Village Way		
Address line 3	Falmer		
Post Code	BN1 9BL	Telephone	
Email address			

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

First name	Peter		
Last name	Rainier		
Organisation	DMH Stallard LLP		
Job Title	Director		
Address line 1	Gainsborough House		
Address line 2	Pegler Way		
Address line 3	Crawley		
Post Code	RH11 7FZ	Telephone	
Email address			

## 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.

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 New Monks Farm allocation and in view of the Council's shortfall against their Objectively Assessed Housing Need summarised at Paragraphs 2.20 to 2.22 believe that the release of this land for development is essential. However, it is our view that Policy 5 as currently drafted is not sound because it fails to provide sufficient flexibility

We support the wording of 'appropriate employment generating floorspace' as this provides flexibility in regards of the type of commercial floorspace provision, thereby enhancing the viability and delivery of the allocation. The delivery of the allocation will require significant investment in infrastructure, principally in respect of the proposed roundabout from the A27 but also in respect of flood mitigation works. Therefore, it is considered that the 'appropriate employment provision' should be given a very broad definition.

We would emphasise the need for flexibility to ensure that the development can accommodate "modern operator's requirements" and the need to recognise the significant employment opportunities associated with a range of uses not just traditional B Class operators.

Policy 4 of the ADLP currently states that a total of 41,000 m<sup>2</sup> of floorspace will be allocated for appropriate employment generating uses in Adur up to 2031 at locations including 10,000 m<sup>2</sup> at New Monks Farm.

It is considered that setting a maximum limit on the amount of employment generating uses at New Monks Farm is too restrictive and not positively prepared. In order that the Council can satisfy themselves that at least 10,000 m<sup>2</sup> of employment generating space will be provided at New Monks Farm this level should be referred to as a minimum. Clearly, should any future developer seek to provide additional floorspace, such provision should be treated positively, provided that it complies with other policies within the ADLP, as well as guidance provided within the NPPF.

With reference the provision of affordable housing, additional flexibility should be provided to ensure viability of the scheme, with regards to level of infrastructure required to support the proposal. Furthermore, flexibility should be provided in acknowledgement of the Housing and Planning Bill, which is soon to achieve Royal Assent and will introduce an obligation to provide an element of housing to be sold at a discount of at least 20% of the market value

It is our view that the above amendment to the Local Plan are essential to make the New Monks Farm allocation viable and deliverable.

Furthermore, whilst we consider that the provision of land for the extension of the proposed primary school is acceptable in principle, at present the site identified at Map 2 and on the Proposals Map is not sufficient and it is considered that the boundary needs an amendment to incorporate the additional land required. This is discussed further in respect of our reps on Map 2 and the Proposals Map.

It is noted that the plan has been amended referring to both the provision of both Section 106 and CIL contributions. Given that viability of the site is critical due to the costs of; highway, flood infrastructure and the country park. Our view is that the level of contributions will need to be negotiated and that it will not be appropriate to address requirements through both Section 106 and CIL. It is considered that this paragraph should be returned to its original draft.

**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).**

It is considered that the following amendment is necessary to make the Policy sound.

*“Land at New Monks Farm (within the area shown on Map 2) will be allocated for mixed use development comprising:*

- *600 homes, **of which up to a maximum of 30% will be affordable subject to viability**, providing a mix of types and tenures in accordance with identified needs.*
- *A community hub.*
- *1 hectare of land to accommodate a new 1-form entry primary school, with additional land for expansion to 2-form entry in the future;*
- ***A minimum of 10,000 sqm of appropriate employment-generating floorspace.***
- *Suitable access onto the A27 in agreement with the Highways England.*
- *Provision or funding of mitigation for off-site traffic impacts on the Strategic Road Network and local roads through a package of measures including improvements to the A27/Grinstead Lane (North Lancing roundabout) junction.*
- *Provision of sustainable transport infrastructure including improved public transport and cycle, pedestrian and equestrian links to Lancing, Shoreham-by-Sea and the South Downs National Park.*
- *Site-specific travel behaviour initiatives which encourage sustainable modes of transport. (This should include a package of travel behaviour initiatives such as residential and workplace travel plans)...”*

Furthermore, it is considered that the following change should be made.

*“Infrastructure requirements are to be secured through planning conditions **and Section 106** as appropriate.”*

(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.**

We act on behalf of New Monks Farm Development Ltd who own the land proposed to be allocated at New Monks Farm. It is considered that the Inspector will want to query and discuss the delivery of the above allocation with the landowners and members of their consultant team.

**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?**

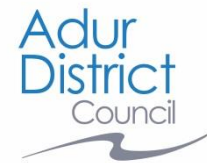
Representations made to the Council will be passed to the Inspector for consideration.

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.**

# 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.

---

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	Martin		
Last name	Perry		
Organisation (where applicable)	New Monks Farm Development Ltd.		
Address line 1	The American Express Community Stadium		
Address line 2	Village Way		
Address line 3	Falmer		
Post Code	BN1 9BL	Telephone	
Email address			

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

First name	Peter		
Last name	Rainier		
Organisation	DMH Stallard LLP		
Job Title	Director		
Address line 1	Gainsborough House		
Address line 2	Pegler Way		
Address line 3	Crawley		
Post Code	RH11 7FZ	Telephone	██████████
Email address	██		

## 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.

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:**

Paragraph 4.29 indicates that the future delivery of market housing should reflect the following mix

- 1 bed dwellings 10%
- 2 bed dwellings 45%
- 3 bed dwellings 35%
- 4 bed dwellings 10%

Policy 21 goes on to state that new residential development should incorporate a range of dwelling types, tenures and sizes that reflect and respond to Adur's identified housing needs and demands.

It is our view that the paragraph and policy when taken together are not effective, as they do not provide sufficient flexibility by allowing for developments to provide a mix in accordance with up date evidence and in respect of local needs.

It should be acknowledged that the district wide housing mix, is just that and, consequently, the mix for individual sites should be considered on a site specific basis particularly because the major allocation at Shoreham Harbour is likely to result in the provision of primarily smaller dwellings, whereas the other allocations will have greater ability to provide larger units.

It is considered that Paragraph 4.29 should be amended to provide a range of house sizes whilst Policy 21 should be amended to reflect this range and make an allowance for the mix of houses to be negotiated subject to up to date information and local needs.

(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).**

It is considered that Paragraph 4.29 should be amended to set out a percentage range of housing mix to allow for flexibility to meet local needs, as follows:

- 1 bed 5 – 10%
- 2 bed 40 - 45%
- 3 bed 35 - 40%
- 4+ bed 10 - 15%

It is considered that Policy 21 should be amended as follows:

“New residential development should incorporate a range of dwelling types, tenures and size (including affordable housing) that reflect and respond to Adur’s identified housing needs and demands. **The housing mix in terms of tenure and size will be determined through negotiation on a site specific basis, taking account of up to date information, local needs and site specific characteristics, settings and the wider context.**”

(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.**

We act on behalf of New Monks Farm Development Ltd, who own the land proposed to be allocated at New Monks Farm and Cala Homes who are the prospective residential developer. It is considered that the Inspector will want to query and discuss the delivery of the above allocation with the landowners and members of their consultant team.



**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?**

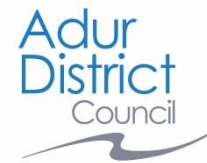
Representations made to the Council will be passed to the Inspector for consideration.

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.**

# 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.

---

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	Martin		
Last name	Perry		
Organisation (where applicable)	New Monks Farm Development Ltd.		
Address line 1	The American Express Community Stadium		
Address line 2	Village Way		
Address line 3	Falmer		
Post Code	BN1 9BL	Telephone	
Email address			

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

First name	Peter		
Last name	Rainier		
Organisation	DMH Stallard LLP		
Job Title	Director		
Address line 1	Gainsborough House		
Address line 2	Pegler Way		
Address line 3	Crawley		
Post Code	RH11 7FZ	Telephone	
Email address			

## 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.

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:**

Paragraph 4.40b and Policy 22 indicate a preferred tenure mix of 75% social/affordable rented and 25% intermediate housing.

In our view the suggested tenure mix is unsound. Whilst it is accepted that there is a paragraph later in the Policy which discussed viability evidence to be put forward to justify non-compliance with due percentage of affordable or the tenure mix, the Policy itself should also be the subject of viability testing.

The Council tested a different tenure split in 2014. The Council should be mindful that it is inappropriate to set unachievable policy obligations. Negotiating lower affordable housing provision/alterations to the tenure split inevitably incurs additional costs in terms of time and money which impairs housing delivery.

In our view the suggested tenure split is unsound and there appears to be no viability testing of the suggested split.

To allow enhanced viability and a balanced approach to delivery, it is considered that the tenure split should revert to a 50/50 split between intermediate and affordable rent.

Furthermore, it is noted that Paragraph 4.40b and Policy 22 make no reference to the Housing & Planning Bill, which introduces an obligation to provide an element of housing to be sold at a discount of at least 20% of the market value. Given that the Housing & Planning Bill is likely to soon achieve Royal Assent, it is considered that Paragraph 4.40b and Policy 22 (as well as any viability evidence) needs to be reconsidered in light of this.

(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).**

It is considered that Paragraph 4.40b and Policy 22 should be amended to reflect a 50/50 split between intermediate and affordable rent.

The Policy should also be amended to reflect the Housing & Planning Bill which is likely to achieve Royal Assent prior to adoption of the Local Plan.

In absence of up to date viability testing, it is considered that this amendment is necessary to ensure delivery of the affordable housing element of New Monks Farm.

(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.**

We act on behalf of New Monks Farm Development Ltd, who own the land proposed to be allocated at New Monks Farm and Cala Homes who are the prospective residential developer. It is considered that the Inspector will want to query and discuss the delivery of the above allocation with the landowners and members of their consultant team.

**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.

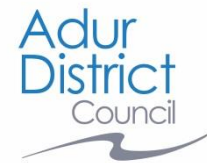
Once this has happened, the Inspector will commence the examination and give notice of the start of the hearing sessions.

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

**Thank you for your representation.**



# 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.

---

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	Martin		
Last name	Perry		
Organisation (where applicable)	New Monks Farm Development Ltd.		
Address line 1	The American Express Community Stadium		
Address line 2	Village Way		
Address line 3	Falmer		
Post Code	BN1 9BL	Telephone	
Email address			

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

First name	Peter		
Last name	Rainier		
Organisation	DMH Stallard LLP		
Job Title	Director		
Address line 1	Gainsborough House		
Address line 2	Pegler Way		
Address line 3	Crawley		
Post Code	RH11 7FZ	Telephone	
Email address			

## 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.

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:**

Paragraph 4.40c and Policy 22 identifies that the OAN indicates a preferred affordable mix of:

- 1 bed dwellings 20-25%
- 2 bed dwellings 30-35%
- 3 bed dwellings 30-35%
- 4 bed dwellings 10-15%

It is our view that the Paragraph and Policy are not currently effective and are therefore unsound. Whilst it is acknowledged that Policy 22 allows for negotiation, it is our experience that affordable housing providers do not consider 4 bedroom affordable dwellings as a viable option, because they are either unaffordable within the Universal Credit limit if for Rent, and too expensive if for Shared Ownership.

(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).**

It is considered that Paragraph 4.40c should be amended to confirm that the final mix of affordable dwellings is subject to negotiation. It is considered that this amendment is required to provide flexibility in order to ensure the delivery of the affordable element of housing.

It is suggested that the following paragraph is included below Paragraph 4.40c.

**“The preferred affordable housing mix in terms of size will be negotiable on each individual site taking into account up-to-date assessments and characteristics of the area.”**

(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.**

We act on behalf of New Monks Farm Development Ltd, who own the land proposed to be allocated at New Monks Farm and Cala homes who are the prospective residential developer. It is considered that the Inspector will want to query and discuss the delivery of the above allocation with the landowners and members of their consultant team.

**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?**

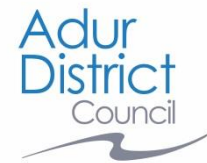
Representations made to the Council will be passed to the Inspector for consideration.

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.**

# 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.

---

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	Martin		
Last name	Perry		
Organisation (where applicable)	New Monks Farm Development Ltd.		
Address line 1	The American Express Community Stadium		
Address line 2	Village Way		
Address line 3	Falmer		
Post Code	BN1 9BL	Telephone	
Email address			

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

First name	Peter		
Last name	Rainier		
Organisation	DMH Stallard LLP		
Job Title	Director		
Address line 1	Gainsborough House		
Address line 2	Pegler Way		
Address line 3	Crawley		
Post Code	RH11 7FZ	Telephone	
Email address			

## 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.

Map  Proposals Map/Map 2 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:**

The fact that the built up area boundary east of the New Monks Farm allocation is shown as “indicative” is supported. However it is considered that the flexibility of the built up area boundary is essential in order to ensure that sufficient space is provided for homes, commercial floorspace, expansion room for the Primary School, and the existing Brighton & Hove Albion Training Ground whilst taking into account physical constraints.

From the studies undertaken by the Respondent, which take into account the site constraints, it appears necessary for the built up area to extend further eastwards at the north-east and south-east of the allocation. Notwithstanding the built up area boundaries indicative nature, it is considered that further adjustment is necessary to provide certainty and clarity.

(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).**

Map 2 and the Proposals Map should be amended to relocate the indicative built up area boundary eastwards in order to ensure that adequate land is provided to allow for provision of the housing, commercial and school allocations along with space for expansion of the Brighton & Hove Football Club Training Ground.

We are currently in the process of masterplanning the site and considering a number of options in terms of the final layout which will determine the appropriate position of the built up area boundary, the masterplan will be submitted to the Local Planning Authority and Inspector in due course.

(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.**

We act on behalf of New Monks Farm Development Ltd who own the land proposed to be allocated at New Monks Farm. It is considered that the Inspector will want to query and discuss the delivery of the above allocation with the landowners and members of their consultant team.

**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.**