

11 May 2016

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Planning Policy Team
Adur and Worthing Councils
Town Hall
Chapel Road
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Dear Sirs

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

We are pleased to have this opportunity to comment on the Amendments to the Proposed Submission Adur Local (2016) (APSAL) and the associated documents. Turley is acting on behalf of Persimmon Homes South Coast Ltd (including their trading divisions Hillreed Homes, Charles Church and Persimmon Homes) who have an interest in the strategic allocation proposed at West Sompting under Policy 6 in the draft plan.

Our client has commissioned site assessment and master planning work in order to better understand the opportunities and constraints at the site. This information has been discussed with the council in order to support the draft policy. Our client is in the process of preparing a planning application at the site, which will be submitted to Adur District Council later in the year.

We have reviewed the latest draft of the plan and now offer the following paragraph / policy specific comments on behalf of our client. These comments update those made to the earlier drafts of the plan in 2014 and 2013.

Paragraph / Policy	Comment
Policy 2: Spatial Strategy	Paragraph 14 of the NPPF requires 'Local Plans to meet objectively assessed needs, with sufficient flexibility to adapt to rapid change'. Paragraph 2.4 of the Plan acknowledges that 'realistic options for locating development are extremely limited due to the compact size of the Local Plan area and its constrained location between the sea and the South Downs National Park'. The strategic allocations of land at West Sompting and New Monks Farm are therefore crucial to delivering the

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	<p>spatial strategy in accordance with the NPPF. The proposed allocation of these sites was arrived at on the basis of evidence that concluded they would not 'significantly compromise the Local Gaps'. Furthermore the detail of the proposals will be assessed against the specific criteria listed in policies 5 and 6.</p> <p>On this basis whilst our client supports the overall objective of the policy, we consider that the specific reference to Sompting Village in the context of the overall spatial strategy for the district is too prescriptive and unnecessary in this policy.</p> <p>Suggested change: Delete final paragraph which currently states 'The character of Sompting village, which lies outside of the Built Up Area Boundary, will be respected and maintained'.</p>
<p>Paragraph 2.69</p>	<p>This paragraph refers to the requirement for a Transport Assessment to support an application at West Sompting to consider the traffic impact on Dankton Lane. Whilst it is accepted that this impact will need to be considered, as Dankton Lane is not referred to in the policy text, this reference is considered confusing.</p> <p>Suggested change: Specific reference to Dankton Lane omitted from the text.</p>
<p>Policy 3: Housing Provision</p>	<p>Paragraph 2.16 of the APSAL confirms that Adur's objectively assessed need (OAN) has now increased to '291 dwellings per annum (5820 dwellings over the Plan period)' based on a study undertaken by the Council in 2015. In this context and notwithstanding the acceptance above that Adur has limited opportunities for locating new development, the proposed minimum level of housing (3,609 homes or 180 dwellings per annum) proposed within Policy 3: Housing Provision is considered to be too low. This provision is proposing to meet approximately 60% of the identified need and it is unclear how the Council propose to deal with the remaining unmet requirement.</p> <p>In order to meet the objective of paragraph 47 of the NPPF, 'To boost significantly the supply of</p>

	<p>housing', the plan should consider further opportunities to increase the supply of housing over the plan period. One such option would be to increase the provision of housing identified at West Sompting, which could provide further community benefits and would be unlikely to result in any significant harm.</p> <p>Suggested change: Increase the minimum number of dwellings proposed over the Plan period, to include exploring the potential to increase the provision at the West Sompting strategic allocation.</p>
<p>Paragraph 2.72</p>	<p>Paragraph 183 of the NPPF explains that 'Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need'. Our client supports this aspiration but believes that the current wording of paragraph 2.72 is too specific over the areas of the scheme that the Neighbourhood Plan may influence.</p> <p>Suggested change: Paragraph 2.72 re-worded to state: There is potential for certain aspects of the West Sompting allocation – for example, design and the layout of open spaces – to be addressed through this process.</p>
<p>Policy 6: Land at West Sompting</p>	<p><u>First paragraph (second bullet)</u></p> <p>The policy currently states that "provision of 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/Busticle Lane <u>A2025 Grinstead Lane</u> junction, A27 Sompting Bypass/Upper Brighton Road (Lyons Farm junction) and enhancement of the traffic calming scheme in West Street".</p> <p>It should be noted that paragraph 32 of the NPPF states:</p> <p>"Plans and decisions should take account of whether:</p> <ul style="list-style-type: none"> • the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce

	<p>the need for major transport infrastructure;</p> <ul style="list-style-type: none"> • safe and suitable access to the site can be achieved for all people; and • improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.” <p>Paragraph 204 of the NPPF also states:</p> <p>“Planning obligations should only be sought where they meet all of the following tests:</p> <ul style="list-style-type: none"> • necessary to make the development acceptable in planning terms; • directly related to the development; and • fairly and reasonably related in scale and kind to the development.” <p>A comprehensive Transport Assessment (TA) will need to be submitted at the planning application stage, which will set out the improvements that need to be undertaken within the transport network to effectively limit the significant impacts of the development. The TA will therefore inform the decision as to whether or not planning obligations should be sought.</p> <p>Suggested change: Add: <u>‘if necessary depending on the outcome of the Transport Assessment that will be submitted at the planning application stage’</u> at the end of the first paragraph, second bullet.</p> <p><u>First paragraph (eighth bullet)</u></p> <p>The policy now states that the development will provide a contribution towards the provision of education facilities. In the absence of an adopted Community Infrastructure Levy (CIL) charging schedule, paragraph 204 of the NPPF is relevant where it states ‘Planning obligations should only be sought where they meet all of the following tests:</p>
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	<ul style="list-style-type: none"> • Necessary to make the development acceptable in planning terms • Directly related to the development; and • Fairly and reasonably related in scale and kind to the development' <p>We consider that reference to the regulations should be included either within the policy or as a footnote.</p> <p>Suggested change: Add '<u>Subject to meeting the tests of the Community Infrastructure Levy Regulations 2010 as amended, a financial contribution towards the provision of education facilities</u>'.</p> <p><u>Sixth and eighth paragraphs</u></p> <p>The policy requires all of the stated elements to be secured through s106/planning conditions. In accordance with Paragraph 204 of the NPPF, this should be subject to satisfying the appropriate tests in the CIL regulations. To acknowledge these tests we suggest that the following amendments are made to the text.</p> <p>Suggested change: Add 'where necessary' after the words 'elements identified above' in the sixth paragraph and after the words 'planning conditions' in the eighth paragraph.</p>
<p>Policy 21: Housing Mix and Quality</p>	<p>Paragraph 50 of the NPPF requires local authorities to 'deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive mixed use communities' it then goes on to state that they should 'plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community..'. Although the housing mix policy seeks to follow this objective, the current wording is considered to be too prescriptive and inflexible. The policy should refer to a preferred mix based on local housing need, but should allow some flexibility so that individual developments can respond to the site circumstances and the local market.</p> <p>Suggested change: Delete 'This will include market housing, based upon the following</p>

	<p>principles:</p> <ul style="list-style-type: none"> • Family sized housing should be provided through infill developments, identified strategic locations, and town centre regeneration. Such dwellings should mainly provide 2-3 bedrooms • Town centre developments should aim to create family sized housing as well as flatted developments, to enhance the housing offer and support town centre regeneration. <p>Replace with: 'This should include a high proportion of family housing (mainly 2-3 bedrooms) in appropriate development.'</p>
<p>Policy 22: Affordable Housing</p>	<p>The Government published the Starter Homes Technical Consultation for comment on 23rd March 2016. The document sets out details of the draft Starter Homes Regulations, which are currently being debated in parliament as part of the Housing and Planning Bill.</p> <p>As Starter Homes will be recognised as a form of affordable housing, specific reference to them should be included within the Local Plan policy.</p> <p>Suggested change: Insert 'New residential development will be expected to make provision for a mix of affordable housing, including social rented, affordable rented, <u>starter homes</u> and/or intermediate housing according to the following site thresholds:'</p>

We trust the above comments are helpful to your further consideration of the plan. We will also continue to liaise with you as our work on the scheme progresses ahead of a planning application.

☛ If you would like any further information please do not hesitate to contact me.

Yours sincerely



Will Cobley
Associate Director

