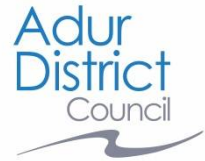


# Amendments to the Proposed Submission Adur Local Plan (2016)



## 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.**

**i** **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	<input type="text" value="Charlotte"/>		
Last name	<input type="text" value="Mayall"/>		
Organisation (where applicable)	<input type="text" value="Southern Water"/>		
Address line 1	<input type="text" value="Southern House"/>		
Address line 2	<input type="text" value="Lewes Road"/>		
Address line 3	<input type="text" value="Brighton"/>		
Post Code	<input type="text" value="BN1 9PY"/>	Telephone	<input type="text" value=""/>
Email address	<input type="text" value="planning.policy@southernwater.co.uk"/>		

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

First name	<input type="text"/>		
Last name	<input type="text"/>		
Organisation	<input type="text"/>		
Job Title	<input type="text"/>		
Address line 1	<input type="text"/>		
Address line 2	<input type="text"/>		
Address line 3	<input type="text"/>		
Post Code	<input type="text"/>	Telephone	<input type="text"/>
Email address	<input type="text"/>		

**Part B – Representation**

Please use separate sheets for each representation

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

**Amendments relating to:**

Policy No.	<input type="text" value="33"/>	Paragraph No.	<input type="text"/>
Map	<input type="text"/>	Other section (please specify)	<input type="text"/>

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

- 2.1 Legally Compliant    Yes    R                      No    •
- 2.2 Sound                      Yes    •                      No R

**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                                      R
- 3.4 Consistent with National Policy    R

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:

Southern Water is pleased to note the inclusion of the provision for the delivery of essential utilities infrastructure in special circumstances within areas of open space, recreation and leisure as a result of the last consultation. However the addition of the following sentence at the end of the provision; *'[...] any loss of open space should be in accordance with (iii) above'* could restrict Southern Water's ability to deliver infrastructure, for example a pumping station, which would result in a negligible loss of open space, yet the need to find an *'equivalent or improved provision in terms of quantity and quality'* could preclude development.

The addition of this clause creates an inflexibility of policy in certain circumstances. Planning Practice Guidance on Water supply, wastewater and water quality (paragraph 005 - Infrastructure) states; *'In identifying sites it will be important to recognise that water and wastewater infrastructure sometimes has particular locational needs (and often consists of engineering works rather than new buildings) which mean otherwise protected areas may exceptionally have to be considered where consistent with their designation.'* (our underline) In certain cases the requirement for small new buildings may not justify the provision of an equivalent quantity of open space.

Southern Water understand the Council's desire to seek replacement of open space lost to substantial development, but would wish the council to acknowledge that an exception should be made for circumstances where the loss of space is not significant.

(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).**

**Southern Water recommends the following proposed modification to the policy wording:**

***'...development of open space for essential utilities infrastructure will be supported in special circumstances, where the benefit outweighs any harm or loss and it can be demonstrated that there are no reasonable alternative sites available. However, any significant loss of open space should be in accordance with (iii) above.'***

(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  R

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

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

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

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

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

**What happens next?**

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

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

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

**Thank you for your representation.**