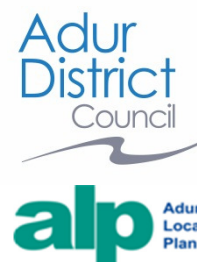


Proposed Submission Adur Local Plan 2014



Representation Form

Return Address:

planning.policy@adur-worthing.gov.uk


Or:

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

Or hand in at:

- Adur Civic Centre, Ham Road, Shoreham-by-Sea, BN43 6PR or
- Portland House, 44 Richmond Road, Worthing, BN11 1HS

**Please return to Adur District Council by 5pm on 1st December 2014
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Please tick if you do **not** want to be informed.

This form has two parts:

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

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

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

Personal Details

First name	<input type="text" value="Peter"/>	
Last name	<input type="text" value="Rainier"/>	
Organisation (where applicable)	<input type="text" value="DMH Stallard LLP"/>	
Address line 1	<input type="text" value="Gainsborough House"/>	
Address line 2	<input type="text" value="Pegler Way"/>	
Address line 3	<input type="text" value="West Sussex"/>	
Post Code	<input type="text" value="RH12 7FZ"/>	Telephone <input type="text" value=""/>
Email address	<input type="text" value=""/>	

Agent's Details (if applicable)

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

Part B – Representation

Please use separate sheets for each representation

1. Which part of the Adur Local Plan does this representation relate to?

Policy No.	<input type="text" value="Policy 5"/>	Paragraph No.	<input type="text" value="2.57 & 2.58"/>
Map	<input type="text"/>	Other section (please specify)	<input type="text"/>

2. Do you consider the Adur Local Plan 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 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 Adur Local Plan to be unsound or not legally compliant, please explain why in the box below:

As set out by our comments in respect of the Policies Map, it is our opinion that the best location for the roundabout is in the vicinity of the Withy Patch Gypsy and Traveller site. The development of a roundabout in this location would require the existing Gypsy and Traveller site to be moved to an alternative location with space for accommodating this to be provided on adjacent land. Proposals for the relocation of Gypsy and Traveller Sites is supported by Policy 25 which indicates the loss of an existing site would be refused unless the proposal complies with other policies and a suitable replacement is found. However, as drafted it is considered that Paragraphs 2.57 and 2.58 and Policy 5 does not reflect the potential need to relocate this site in order to meet the development needs of the Shoreham Airport and New Monks Farm allocations. If it is not possible to relocate the existing Gypsy and Traveller Site the best solution in terms of providing a deliverable access could not be provided and as such these paragraphs and Policy are not justified and the plan is not sound as currently drafted.

(Continue on a separate sheet if necessary)

5. Please explain in the box below what change(s) you consider necessary to make 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 the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested or revised wording of any policy or supporting text. Please be as precise as possible).

Paragraphs 2.57 and 2.58, and Policy 5 should be amended to reflect the potential requirement to re locate the existing Gypsy and Traveller site at Withy Patch. Policy 5 should be amended to state that in the case that the best position for a new roundabout is decided to be at Withy Patch, land for provision of a replacement Gypsy and Traveller site should be provided on adjacent land

(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 a prospective purchaser who expects to exchange contracts for the purchase of land at New Monks Farm (Policy 6) prior to the Examination in Public of the Draft Adur Local Plan. Therefore, we consider that our input in terms of the scheme design, viability and delivery would be an important consideration for the appointed Inspector.

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?

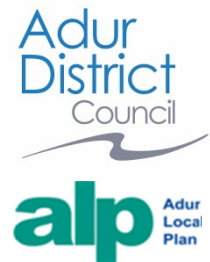
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Interested parties will be informed of the start date of the hearing sessions and the matters to be considered.

Thank you for making representations.

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

Personal Details

First name	Peter	
Last name	Rainier	
Organisation (where applicable)	DMH Stallard LLP	
Address line 1	Gainsborough House	
Address line 2	Pegler Way	
Address line 3	West Sussex	
Post Code	RH12 7FZ	Telephone 
Email address		

Agent's Details (if applicable)

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

Part B – Representation

Please use separate sheets for each representation

1. Which part of the Adur Local Plan does this representation relate to?

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

2. Do you consider the Adur Local Plan 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 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 Adur Local Plan to be unsound or not legally compliant, please explain why in the box below:

We support the general provision of this allocation which is considered necessary in order to meet the assessed housing needs for the District. However, we consider that as drafted it is not effective nor positively prepared.

In order to meet the significant development costs for providing a new roundabout off the A27, as well as other transport improvement costs and the provision of significant drainage infrastructure, the development would only be viable and therefore deliverable on the basis of providing 600 dwellings. A restriction where only 450 dwellings could be delivered would not be viable or deliverable and therefore the plan would not be effective or sound.

The basis for proposing a range of dwellings where only the upper figure would be achievable subject to impacts on biodiversity and landscape is not considered to be a positively prepared Policy. The Local Plan and Housing (Duty to Co-Operate) Study 2013 indicates that the level of housing delivered by the plan is not sufficient to meet the needs of the District. The Housing (Duty to Co-Operate) Study 2013 indicates that the Council's Objectively Assessed Housing Need is in the range of 3,600 to 4,800 whilst the Local Plan makes provision for only a range of 3,488 – 3,668. The housing supply set out by Policy 3 of the Local Plan is therefore only effective and therefore sound on the basis that 600 dwellings are provided on land at New Monks Farm. Consequently, it is considered that as drafted the plan is not positively prepared as the delivery of only 450 dwellings at New Monks Farm would mean that the housing needs of the District would not be met, even in the circumstances where all other housing land identified by the Local Plan is delivered which we consider to be very unlikely.

The provision for 10,000 sq. m of 'appropriate employment generating space' is not considered to be positively prepared, the intended meaning of 'appropriate' is not defined anywhere in the Plan and in our view should include some provision for both office, light industrial, storage, leisure and retail (non-food) to ensure sufficient flexibility to meet each of these market demands and therefore viability and deliverability of the proposed allocation.

(Continue on a separate sheet if necessary)

5. Please explain in the box below what change(s) you consider necessary to make 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 the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested or revised wording of any policy or supporting text. Please be as precise as possible).

The policy should be amended to be more positively framed, as suggested below:

- “600 dwellings subject to provision of a detailed landscape strategy and ecological enhancement scheme
- 10,000 sq. m of employment generating floorspace which could include elements of office, light industrial, warehouse, leisure or retail (non-food). The provision of leisure or retail (non-food) space should be accepted, if necessary for viability of the scheme. “

(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 a prospective purchaser who expects to exchange contracts for the purchase of land at New Monks Farm (Policy 6) prior to the Examination in Public of the Draft Adur Local Plan. Therefore, we consider that our input in terms of the scheme design, viability and delivery would be an important consideration for the appointed Inspector.

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

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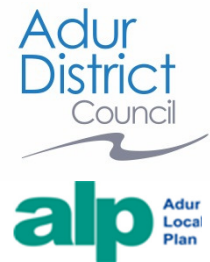
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Interested parties will be informed of the start date of the hearing sessions and the matters to be considered.

Thank you for making representations.

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

Personal Details

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Part B – Representation

Please use separate sheets for each representation

1. Which part of the Adur Local Plan does this representation relate to?

Policy No.	<input type="text"/>	Paragraph No.	<input type="text"/>
Map	<input type="text" value="Policies Map, Map 1, Map 2"/>	Other section (please specify)	<input type="text"/>

2. Do you consider the Adur Local Plan 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 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 Adur Local Plan to be unsound or not legally compliant, please explain why in the box below:

We are supportive of the extension of the built up area boundary of Lancing as it is necessary to support the housing needs of the District. However, we consider that the Policies Map, Map 1 and Map 2 as drafted are not justified as the proposed built up area boundary alteration east of Lancing is not the most appropriate option when considered against other alternatives.

The proposed development of the site has been considered in relation to the detailed site specific Flood Risk Assessment. It has become clear that the best option to develop the land is to maintain and enhance the existing water courses through the site. As well providing a more natural hydrological solution, this approach would provide greater opportunities for ecological and landscape enhancements as part of the proposed allocation. In order to meet the upper level of housing (600) an alteration would be needed to the proposed Built up Area Boundary which is shown on the provided plan (Drawing No. DMHS/Plan1). Consequently, we find that the proposed built up area boundary is unsound when considered against the site specific flood risk issues, we also find that the Policies Map, Map 1 and Map 2 are not consistent with National Policy.

In addition, the proposed indicative location of the roundabout to serve Land at New Monks Farm (Policy 6), Shoreham Airport (Policy 7), businesses at Shoreham Airport and Lancing College is not considered to be justified as a more appropriate location would be further east along the A27 (Old Shoreham Road). This option is considered to offer a more effective approach in terms of; the highway infrastructure, needs of the employment allocation at Shoreham Airport, existing businesses at Shoreham Airport, Lancing College and the mixed use development at New Monks Farm. There should be some flexibility built in-to the Policies Map, Map 1 and Map 2 in order to enable the best roundabout solution to be delivered as detailed schemes for both allocations develop. At its current position the Policy 6 & 7 allocations would not be deliverable and therefore the Plan is not effective and subsequently unsound. Conversely, the location of the roundabout as shown on Drawing DMHS/Plan1 is deliverable.

Development of significant B1 space would only be viable and therefore deliverable on the basis of direct access from the A27, consequently the Policies Map, Map 1 and Map 2 should be amended to make provision for this development adjacent to the A27 as well as the revised location of the roundabout. This is also considered to be a more effective solution in terms of visual effects, as it would allow for the developments of both the roundabout and the business park to be ameliorated as part of a comprehensive landscape and design strategy.

(Continue on a separate sheet if necessary)

5. Please explain in the box below what change(s) you consider necessary to make 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 the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested or revised wording of any policy or supporting text. Please be as precise as possible).

We would seek that the Policies Map, Map 1 and Map 2 are amended as set out by the attached plan (Drawing No: DMHS/Plan1), or other suitable alternative plan to be agreed with the District Council.

(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

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

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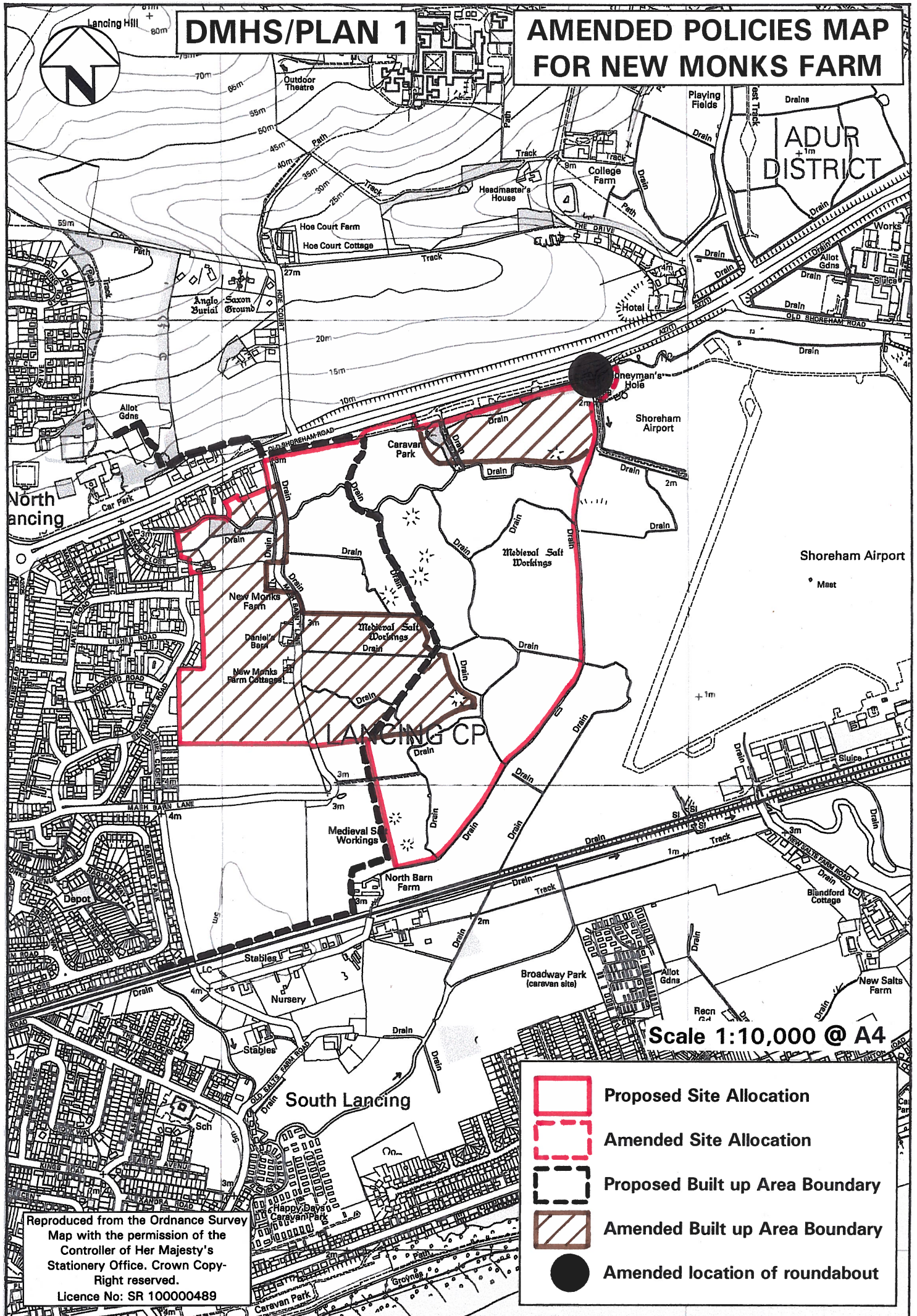
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Interested parties will be informed of the start date of the hearing sessions and the matters to be considered.






Thank you for making representations.

DMHS/PLAN 1

AMENDED POLICIES MAP FOR NEW MONKS FARM



Scale 1:10,000 @ A4

-  Proposed Site Allocation
-  Amended Site Allocation
-  Proposed Built up Area Boundary
-  Amended Built up Area Boundary
-  Amended location of roundabout

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