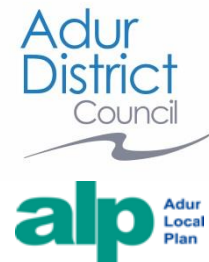


Proposed Submission Adur Local Plan 2014



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
Late representations will not be considered.**

 **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. 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	<input type="text" value="Tom"/>	
Last name	<input type="text" value="Ormesher"/>	
Organisation (where applicable)	<input type="text" value="National Farmers Union"/>	
Address line 1	<input type="text" value="Unit 8, Rotherbrook Court"/>	
Address line 2	<input type="text" value="Bedford Road"/>	
Address line 3	<input type="text" value="Petersfield"/>	
Post Code	<input type="text" value="GU32 3QG"/>	Telephone <input type="text"/>
Email address	<input type="text" value="REDACTED"/>	

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="22 Affordable Housing"/>	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:

In the vast majority of cases, proposals for residential dwellings on agricultural holdings will be to accommodate farm workers and will be undertaken at direct cost to the farm business. Investment in farm workers accommodation creates a fixed asset entailing only limited capital gains. This is because the development is primarily brought forward to maintain the future operational requirement of the farm enterprise and in many cases will be subject to an Agricultural Occupancy Condition. Under these circumstances the creation of a new agricultural dwelling would not attract the kind of financial returns usually associated with commercial house building, and would have been constructed in the absence of any other suitable affordable housing in the local area.

With a rapidly growing population, the pressures on land-use are greater than ever before and in a time of food shortage and rising costs for consumers; farmers need to become more productive within sustainable limits. For agriculture to achieve greater productivity within sustainable limits, it will be essential that developments including all agriculture buildings and structure's, agriculturally tied buildings and any barn conversions are able to gain planning permission easily and without any additional costs.

As agricultural workers dwellings are often brought forward in place of otherwise unavailable affordable housing, combined with a strategic need to maintain the viability of the business; it is inappropriate to require further additional support of affordable housing for these developments, as this could make the workers accommodation unaffordable from the outset. Put simply, farm workers dwellings constructed privately by a farm business function as affordable housing where none is otherwise available in the local area, and an affordable housing contribution would essentially see farmers having to pay twice when they are simply trying to service their own business need.

It is our suggestion that seeking affordable housing contributions on farm developments would be inconsistent with the following Sections of the National Planning Policy Framework:

NPPF 20 "To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business". In adding additional cost burden on businesses looking to either expand or simply remain operational, particularly where the equity value of the development is neutral due to its operational necessity; we suggest that charging an affordable housing contribution does not help achieve economic growth or proactively meet the development needs of business as per this section of NPPF.

NPPF 21 "Investment in business should not be over-burdened by the combined requirements of planning policy expectations". In serving their own need for affordable housing and having to pay a contribution to other affordable housing; we believe this is a double payment. In this context the policy creates an additional burden on farm businesses, compared to other types of development proposal that would only have to contribute once.

NPPF 28 "Planning policies should support economic growth in rural areas in order to create jobs and prosperity by..... promoting the development and diversification of agricultural and other land-based rural businesses". We believe that the affordable housing contribution will act as a barrier to economic growth of agricultural businesses.

For the reasons stated above we believe that Policy 22 is inconsistent with national policy. In addition we believe that it is not appropriate to ask farm businesses to pay twice for affordable housing, and in this context Policy 22 is not justified.

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 suggest that agricultural developments should be exempt from payment of an affordable housing contribution, and the policy should be re-worded to reflect this.

It is our suggestion that the final line of Policy 22 should be re-worded in the following manner, to include the underlined text:

“This policy will apply to all types of residential development, including conversions and changes of use, with the exception of those demonstrated as being required for rural farmworker and forestry dwellings. Where it is feasible, ~~the~~ affordable housing should be integrated throughout the development.”

In exempting farm workers dwellings from this policy, we believe that this avoids the double payment risk and would therefore make the Local Plan sound with reference to NPPF Paragraph 182.

(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.

I do not especially wish to participate at the hearing as I believe I have outlined the main point in this consultation response. I nonetheless would be willing to participate if there is a need for additional representation on this matter.

The suggested solution as outlined above would be a simple remedy. Given the very low number of farm worker dwellings likely to be proposed within the plan period, this is unlikely to represent a large cost to the Local Planning Authority and should therefore not be particularly contentious.

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 making representations.