

28 November 2014

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

Dear Sirs

## **Representation to Proposed Submission Adur Local Plan 2014**

We are pleased to have this opportunity to comment on the Proposed Submission draft of the Adur Local Plan. 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 west of Sompting under Policy 6.

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.

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 an earlier draft of the plan in 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 spatial strategy in accordance with the NPPF. The proposed allocation of these sites was arrived at on

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	<p>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>In this context, whilst we support the policy wording we see no reason for the sixth paragraph, which states 'Development which would result in the coalescence or loss of identity of settlements will be resisted' and therefore suggest that this is deleted.</p> <p>We also 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><b>Suggested change: Delete sixth paragraph which states <u>'Development which would result in the coalescence or loss of identity of settlements will be resisted'</u></b></p> <p><b>Delete final paragraph which currently states <u>'The character of Sompting village, which lies outside of the Built Up Area Boundary, will be respected and maintained.'</u></b></p>
Paragraph 2.72	<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><b>Suggested change: Paragraph 2.72 re-worded to state: There is potential for certain aspects of the West Sompting allocation – <del>for example, design and the layout of open spaces</del> – to be addressed through this process.</b></p>
Policy 6: Land at West Sompting	<p><u>Third paragraph (fourth bullet)</u></p> <p>The requirement for formal open space in this location against alternatives has not been thoroughly tested, nor has the impact this would have on the site's housing capacity. The need for</p>

	<p>formal open space and the delivery options for this within and beyond district boundaries should be assessed thoroughly before such a requirement could be progressed as an option. The social / economic impact of any reduction in housing capacity at the site would also need to be assessed to justify such a proposal. In the absence of such evidence we would suggest the current wording is changed. Options should be explored by the Council to identify specific deliverable projects to fund in the area as proven necessary.</p> <p><b>Suggested change: The words ‘provision for formal sports’ is replaced by ‘if provision necessary a financial contribution towards the provision of formal sports in accordance with Council standards.’</b></p> <p><u>Seventh paragraph</u></p> <p>Paragraph 204 of the NPPF sets out the tests that all planning obligations must meet. To acknowledge these tests we suggest that the following amendment to the text is made.</p> <p><b>Suggested change: Add ‘where necessary’ after the word ‘addressed’.</b></p>
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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.

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

Yours sincerely



Will Cobley  
**Associate Director**

