

# **SUBMISSION ADUR LOCAL PLAN 2016**

## **STATEMENT OF CONSULTATION**

**October 2016**

*This statement has been prepared in order to comply with Regulation 22(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012*



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## 1. Introduction

1.1 The Town and Country Planning (Local Planning) (England) Regulations 2012 set out the documents that must be submitted with the Local Plan to the Secretary of State. One of these documents is a statement setting out:

- which bodies and persons were invited to make representations under Regulations 18 and 20 (of the Regulations referred to above);
- how those bodies and persons were invited to make such representations;
- a summary of the main issues raised by those representations, and
- how those main issues have been addressed in the development plan document.

1.2 This Statement of Consultation fulfils that role. It explains what consultation has been carried out at each key stage in the Adur Local Plan's preparation, how it has been done, who has been involved, the results of each consultation stage and how these have influenced the final document. (It should also be noted that the Local Plan needs to comply with legislation, planning policy and guidance, and have regard to the Council's evidence base).

1.3 The key stages of consultation / publication covered by this Statement are as follows:

Stakeholder Issues and Options	June – July 2010
Adur Housing and Employment Options	27 June – 7 August 2011
Draft Adur Local Plan	19 September – 31 October 2012
Revised Draft Adur Local Plan	26 September – 7 November 2013 *
Proposed Submission Adur Local Plan	20 October – 1 December 2014
Amendments to the Proposed Submission Adur Local Plan 2014 (in relation to New Monks Farm strategic allocation)	9 December 2015 – 4 January 2016
Amendments to the Proposed Submission Adur Local Plan (2016)	31 March 2016 – 11 May 2016

\* The deadline for the receipt of representations was extended by a further two weeks.

1.4 It is important to note that the stages set out above were not the only consultation undertaken in preparation of the Local Plan. Since work first began on the document in 2008, there has been an on-going process of dialogue with key stakeholders such as West Sussex County Council; infrastructure providers; statutory bodies including the Environment Agency; landowners and developers.

### From Core Strategy to Local Plan

1.5 The original intention was to progress a Core Strategy addressing strategic sites and policy issues followed by a separate document on Site Allocations and Development Management policies. A decision to move instead to a Local Plan encompassing all of these elements was taken in 2011, in order to progress the document more quickly and to be consistent with the Coalition Government's emerging approach. This had no impact on work relating to the evidence base or

former consultation which remained relevant but does explain changes in the title of the document and the breadth of policies being consulted on in later stages. In addition it should be noted that initially the Core Strategy covered the whole of Adur District. However, following the granting of full powers to the South Downs National Park Authority (SDNPA) in 2011, it was subsequently agreed that the development plan document being progressed by the SDNPA would include that part of Adur which lies within the National Park. As a result the Adur Local Plan covers only that part of Adur which lies outside of the South Downs National Park.

## **The Statement of Community Involvement**

**1.6** The guiding principles for all consultation relating to the Local Plan are set out in the Council's Statement of Community Involvement (SCI). Adur District Council's original SCI was adopted in 2006. Following joint working with neighbouring Worthing Borough Council, a joint SCI was adopted in 2012, taking into account new issues such as the Duty to Co-operate and neighbourhood planning. This document can be found on the Councils' website [www.adur-worthing.gov.uk/adur-ldf/statement-of-community-involvement](http://www.adur-worthing.gov.uk/adur-ldf/statement-of-community-involvement).

**1.7** The Council's views are that taking account of the public's opinions (and those of other stakeholders) and local knowledge as early as possible is the best way to make sure that development in both areas has the widest possible local support. By making the process as clear as possible, it will be easier for the public to see how decisions have been made and how comments have been considered. To achieve this, the Council will:

- keep any consultation process simple and communicate clearly;
- make it easy for the public to be involved;
- make sure the public's involvement counts, and
- share information and provide feedback.

**1.8** In addition to the general public, the Council has a range of bodies and organisations to consult. There are essentially two categories referred to throughout this document. **Specific Consultation Bodies** are those that the Council has a statutory duty to consult with should it believe that they have an interest in the subject covered. Appendix One sets out those that will always be consulted on development plan documents. **General Consultation Bodies** on the other hand are those that the Council may consult should it be appropriate to do so. These include community and local environment groups as well as bodies representing the interests of specific groups, for example, ethnic, religious, and disabled interests.

**1.9** Some groups are harder to reach than others. In Adur, the young and the working age population have both been under-represented in consultation responses. Contacting schools, youth clubs and the Youth Council, and targeting railway stations as a means of contacting commuters are options which have been used to address this situation at some stages.

## **The Consultation Database**

**1.10** The contact details for specific and general consultation bodies are kept in Adur District Council's Local Development Framework consultation database. In addition to these bodies, the Council holds details of members of the public and local

groups/organisations who have either asked to be kept informed of progress on the Local Plan or have previously made representations on consultation documents. These individuals and groups are contacted when appropriate throughout the plan preparation process.

### **Newsletters**

**1.11** From 2011 the Council has used a newsletter as a means to advertise key stages or updates in the process of preparing the Core Strategy / Local Plan. It has been sent to everyone on the consultation database, either via email or post. Eleven had been published by August 2016. They are also available on the Council's website.

## **2. Stakeholder Issues and Options 2010**

June – July 2010

### **A brief introduction to the consultation.**

**2.1** As part of the process of evidence gathering, the Council decided to undertake a comprehensive consultation exercise with key stakeholders. This was viewed as an opportunity to “fact check”, to ensure that correct information was fed into the subsequent public consultation document.

### **Who was invited to make representations?**

**2.2** This consultation stage was aimed at key infrastructure providers including West Sussex County Council, developers associated with certain sites such as Shoreham Airport, and some statutory agencies, for example, Natural England, English Heritage, and the Highways Agency (now known as Historic England and Highways England).

**2.3** Appendix One gives a full list of statutory consultees who provided a response to this consultation.

### **How were they invited to make representations?**

**2.4** A ‘slimline’ Draft Core Strategy document was produced, containing a vision for the District; key objectives; discussion on four spatial options and a range of policy options. Four greenfield housing sites were included for discussion with a range of housing levels. The sites were at New Monks Farm, Lancing north of the Hasler Estate, Lancing, Sompting Fringe and Sompting North. Opportunities for development at Shoreham Airport, Shoreham Harbour and Shoreham Cement Works were also considered.

### **A summary of the main issues raised as a result of the consultation.**

**2.5** A number of stakeholders responded in some depth to the consultation. In addition to infrastructure requirements, the issues covered included:

- green infrastructure and biodiversity;
- the implications of development for air quality;
- the role of Shoreham Airport as a visitor attraction;
- flooding issues both in relation to specific sites and the general development management policy;
- the role of a mixed development at New Monks Farm in delivering regeneration benefits;
- the need for development sites to address water supply, sewerage and wastewater treatment;
- how to address the future of Shoreham Cement Works in the light of National Park designation; and
- the protection of the built and natural environment.

### **How the issues were addressed.**

**2.6** A number of follow up meetings took place to discuss issues that had been raised through this consultation exercise. Overall a significant amount of evidence was provided in relation to the key sites and to infrastructure requirements in relation to development. In addition, guidance on a range of issues such as transport, and the environment was reflected in changes made to the evolving policies of the Plan.

### 3. Adur Housing and Employment Options 2011

27th June – 7th August 2011

#### A brief introduction to the consultation

**3.1** With the South East Plan set to be abolished, the role of setting the housing target for the Core Strategy devolved to the Council and its local community. This stage of consultation sought views, therefore, on what level of housing and employment development should be included in the draft Adur Core Strategy. (It should be noted that by this point the Local Plan no longer addressed that part of Adur within the South Downs National Park – see para 1.5 above).

#### Who was invited to make representations?

**3.2** Over 400 consultees on the consultation database were sent information by email or post as appropriate. This included specific consultation bodies; general consultation bodies and any other individual or organisation who had asked to be kept informed (see paragraph 1.10). In order to reach the wider public, publicity information and / or leaflets were available at the Council's offices and on its website; and at libraries; Parish Council Offices; health centres; and local shops. Leaflets were also made available to Members for distribution to their constituents, and via a number of local events. An e- newsletter was published on the Council's website and distributed by email.

**3.3** Appendix One gives a full list of statutory consultees who provided a response to this consultation.

#### How were they invited to make representations?

##### Consultation documents.

**3.4** The consultation document consisted primarily of a leaflet with brief questionnaire, with two supporting background documents: an Options Technical report; and Sustainability Appraisal of the options. These documents can be found on the Council's website [www.adur-worthing.gov.uk/media/media.98760.en.pdf](http://www.adur-worthing.gov.uk/media/media.98760.en.pdf). The consultation sought views on four housing options and two employment options as follows:

<b>Housing Options</b>	
Option 1	65 homes per year; 1105 homes 2011-2028*: brownfield land only.
Option 2	105 homes per year; 1785 homes 2011-2028: level of development set in South East Plan.
Option 3	155 homes per year; 2635 homes 2011-2028: more opportunities for affordable housing than Options 1 and 2.
Option 4	270 homes per year; 4590 homes 2011-2028: would meet all Adur's predicted housing needs.
<b>Employment Options</b>	
Option A	Baseline Scenario: no allocation of new employment sites
Option B	Economic Intervention Scenario: allocation of new employment sites.



\*This should have read 67 homes per year: 1150 homes 2011-2028. As the difference was only 2 homes per year, this was not thought to undermine the integrity of the consultation, especially as this represented the “brownfield” option.

**3.5** The opportunity was made for people to respond to the questionnaire online or by returning a paper copy.

Media.

**3.6** A press release was issued before the start of the consultation period.

Presentations / events attended by officers.

**3.7** Presentations or seminars were undertaken with local community groups; the Local Strategic Partnership Executive Board; the Shoreham Airport Consultative Committee; Parish Councils, and members of Adur Viewpoint, and those on the District’s Residents Panel, who had expressed an interest in planning. In addition, officers held sessions for three classes at a Lancing secondary school and attended the Southwick Fair and the Shoreham Farmers Market.

**A summary of the main issues raised as a result of the consultation.**

**3.8** A total of 169 responses were received. 14 were sent directly online and 155 were received on paper. As plan preparation was still at an informal stage (Regulation 18), comments were accepted after the end of the consultation period.

**3.9** The results in relation to each option were as follows:

	Questionnaire responses	Viewpoint seminar	Sir Robert Woodard Academy
Housing Option 1	47 (28%)	4	7
Housing Option 2	55 (33%)	9	28
Housing Option 3	25 (15%)	10	8
Housing Option 4	28 (17%)	1	1
No option selected	14 (8%)	0	0
<b>Total</b>	<b>169</b>	<b>24</b>	<b>44</b>
Employment Option A	67 (40%)	9	16
Employment Option B	87 (51%)	15	32
No option selected	15 (9%)	0	0
<b>Total</b>	<b>169</b>	<b>24</b>	<b>48</b>

**3.10** Lancing Parish Council did not support any of the options due to concerns regarding housing densities; infrastructure; drainage problems, and the number of empty business properties in the area. Sompting Parish Council reluctantly supported Housing Option 1 and Employment Option A with concerns regarding the loss of gaps between Lancing / Sompting and Worthing, and congestion on the A27 and A259 roads.

**3.11** The most common general issues raised were:

- The limited environmental capacity of the area to absorb new development.
- The strain new housing would place on the social infrastructure of the District.
- Exacerbation of existing congestion problems on the A27 and A259 by new housing and employment.
- Exacerbation of existing parking problems by new development.
- Concerns regarding development in areas at risk of flooding.
- The need for more affordable housing.
- The need to bring empty properties back into use before new properties are built.
- The impact on/loss of the character of the District.
- Only one option (Option 4) meets the District's housing demand.

#### **How the issues were addressed.**

**3.12** Two issues impacted on the relevance of the consultation results in moving forward with housing numbers in the Core Strategy. First, the number of responses was low despite the level of publicity. Second, the Government had subsequently strongly indicated a new direction through publication of the Draft National Planning Policy Framework. This related to basing Local Plans on objectively assessed development needs, and joint working. These factors together with other advice and evidence (including the Sustainability Appraisal) led the Council to decide to move forward by consulting further on two housing options based on Options 2 and 3, focusing on specific greenfield sites that would need to be allocated to enable that level of development.

**3.13** The consultation results in relation to Employment were considered to indicate a clear preference for Option B: the Economic Intervention scenario. It was proposed, therefore, to include allocations in the emerging document to reflect this.

## **4. Draft Adur Local Plan 2012**

19th September – 31st October 2012

### **A brief introduction to the consultation**

**4.1** This was the first opportunity to consult on a draft of the whole Adur Local Plan, setting out the Vision and Objectives; a Strategy for Change and Prosperity; area based policies for the main settlements and countryside, and development management policies. A key element at this stage related to Housing Target Options. Two options were put forward with a range of greenfield site allocations.

#### **Who was invited to make representations?**

**4.2** Approximately 570 consultees on the consultation database were sent information by email or post as appropriate. This included specific consultation bodies; general consultation bodies and any other individual or organisation who had asked to be kept informed (see paragraph 1.10). In order to reach the wider public, all of the main documents together with a leaflet / questionnaire were available at the Council's offices and on its website; at libraries; Parish Council Offices, and community centres. Copies of the leaflet / questionnaire were also distributed to various shops, cafes, public houses, and health centres throughout Adur. Facebook was used for the first time as a means to publicise the consultation exercise. A newsletter was published earlier in the summer to highlight the consultation in advance.

**4.3** Appendix One gives a full list of statutory consultees who provided a response to this consultation.

#### **How were they invited to make representations?**

##### Consultation documents

**4.4** The consultation documents consisted of:

- A full version of the Draft Adur Local Plan 2012;
- An eight page A3 leaflet with short questionnaire, setting out the background to the Plan, the housing options and employment proposals. This was the most widely distributed document. The questionnaire could also be filled in online;
- A short document setting out answers to Frequently Asked Questions;
- A Background Evidence Document;
- The Sustainability Appraisal;
- Sequential Test and Exception Test of sites included in the Plan, and
- The Adur Habitats Regulations Assessment.

These documents can all be found on the Council's website ([www.adur-worthing.gov.uk/adur-local-plan-consultation/2012-consultation](http://www.adur-worthing.gov.uk/adur-local-plan-consultation/2012-consultation)).

**4.5** All aspects of the Draft Local Plan were set out for consideration. This included:

- the Vision and Objectives developed from work with stakeholders early in the plan process;

- a Strategy for Change and Prosperity to facilitate regeneration and meet needs for housing and employment land;
- area based policies for the main settlements and Adur's countryside, and
- development management policies covering issues such as conservation areas and listed buildings, open space provision and sustainable development.

**4.6** Following on from the previous consultation stage, the Draft Local Plan 2012 put forward two Housing Target Options up to 2028, with a range of greenfield site opportunities as follows:

<b>Housing Option A</b>	<b>Target</b>	1785 homes (105 per year) plus 1050 at Shoreham Harbour. Not dissimilar to the South East Plan figure.
<b>Option A1</b>		450 homes at New Monks Farm; 250 homes at Sompting Fringe; 300 homes at Hasler; 870 homes on brownfield sites.
<b>Total 1870 homes</b>		
<b>Option A2</b>		450 homes at New Monks Farm; 450 homes at Hasler; 870 homes on brownfield sites.
<b>Total 1770 homes</b>		
<b>Option A3</b>		450 homes at New Monks Farm; 420 homes at Sompting Fringe; 870 homes on brownfield sites.
<b>Total 1740 homes</b>		
<b>Housing Option B</b>	<b>Target</b>	2635 homes (155 per year) plus 1050 at Shoreham Harbour. Goes further towards meeting housing needs but has more impact on Local Green Gaps, flood risk and on infrastructure.
		600 homes at New Monks Farm; 210 homes at Sompting North; 420 homes at Sompting Fringe; 600 homes at Hasler; 870 homes on brownfield sites.

**4.7** In order to pursue the agreed strategy of Economic Intervention, up to 66,000 square metres of land was allocated for employment generating uses at Shoreham Airport, New Monks Farm and Shoreham Harbour.

#### Media

**4.8** An advert was placed two weeks running in the local weekly paper setting out the location and dates of the consultation exhibition, and giving general details on the overall consultation exercise. In addition, a full page article appeared setting out key issues of the Draft Local Plan and how to participate in consultation.

**4.9** Information about the consultation exercise was put on the Council's Facebook page.

#### Exhibitions, presentations and events attended by officers

**4.10** An exhibition about the Draft Local Plan was located at six different venues throughout Adur over a six week period. These were the key community buildings in

each of the four main settlements, the Council's offices and, for one morning, the Shoreham Farmers Market. The exhibition was staffed by Planning Policy Officers on certain days, which were publicised in advance.

**4.11** Presentations or seminars were held with the Local Strategic Partnership, interested members of the Viewpoint Panel, and the Youth Council.

**A summary of the main issues raised as a result of the consultation.**

**4.12** 289 representations were received from members of the public and a range of organisations and businesses. A summary of the main issues raised was made available on the Council's website:

[www.adur-worthing.gov.uk/media/media,111437,en.pdf](http://www.adur-worthing.gov.uk/media/media,111437,en.pdf)

In terms of the two Housing Targets, preferences were as follows:

Housing Target	Number of votes	Percentage
Option A: 1785 homes	123	42.6
Option B: 2635 homes	31	10.7
None of the above	47	16.2
No specific preference	4	1.4
No target selected.	84	29.1
<b>Total</b>	<b>289</b>	<b>100</b>

**4.13** Results regarding the various Housing Options were:

Housing Option	Number of votes	Percentage
Option A1	28	9.7
Option A2	26	9
Option A3	66	22.8
Option B	28	9.7
None of the above	49	16.9
No option selected	90	31.1
No specific preference	2	
<b>Total</b>	<b>289</b>	<b>100</b>

**4.14** Some of the other main issues raised were as follows:

- neither of the housing targets are acceptable as they are too high and would have unacceptable impacts on the District's resources and infrastructure;
- more emphasis should be put on brownfield development, Shoreham Harbour or smaller pockets of development than the greenfield sites;
- flood risk and inadequate surface drainage were cited as particular issues in relation to development at New Monks Farm and Hasler Estate;
- loss of Local Green Gaps and biodiversity were concerns particularly in relation to allocations at New Monks Farm and Sompting;
- impact on major roads such as the A27 and A259, and on more local residential roads from the increase in traffic arising from development;

- the inadequacy of current infrastructure such as water supply, schools and health facilities to cope with levels of development proposed;
- concerns about the impact of employment development at Shoreham Airport on the operations of the airport itself;
- general support for development at Shoreham Harbour.

#### **How the issues were addressed**

**4.15** Significant concerns were raised regarding flood risk at the Hasler Estate, including by the Environment Agency. Further evidence work, discussions and a lack of any information from the developer regarding flood risk and deliverability led to the decision that this site was not deliverable and it was consequently excluded from the Local Plan. Similar work on the other greenfield sites especially regarding landscape, biodiversity and deliverability led to a reappraisal of their capacity. This resulted in a housing target figure being carried forward that did not precisely reflect either of those put forward in the 2012 Plan. The impact of this work on the employment allocations saw a reduction in capacity at Shoreham Airport and Shoreham Harbour and a consequent lower overall target.

**4.16** A policy regarding water quality was added in response to comments received from Southern Water now Policy 36 of the Proposed Submission Adur Local Plan 2014. Other alterations were made to policies and to supporting text to address a range of issues raised.

## **5. Revised Draft Adur Local Plan 2013**

26th September – 7th November 2013 <sup>1</sup>

### **A brief introduction to the consultation**

**5.1** This version of the Local Plan set out the Council's chosen housing target and detailed policies regarding the greenfield sites allocated to help meet that target. It also contained a revised employment target and changes to other policies reflecting the outcome of consultation and further work.

### **Who was invited to make representations?**

**5.2** Approximately 750 bodies or individuals on the consultation database were sent information by email or post regarding the consultation arrangements. This included specific consultation bodies, general consultation bodies and any other individual or organisation who had asked to be kept informed (see paragraph 1.10). Members of the Adur and Worthing Local Strategic Partnership Board were asked to pass on information about the consultation to their relevant groups.

**5.3** In order to reach the wider public, all of the main documents together with a leaflet were available at the Council's offices and on its website; and at the three District libraries and at all the exhibitions. Copies of the leaflet were also distributed to various shops, cafes, public houses, community centres and health centres throughout Adur, as well as being made available to Councillors for distribution at their surgeries. Facebook and Twitter were used as a means to publicise the consultation exercise as a whole and individual events within it. A newsletter was published on the Council's website and distributed by email or by hard copy where consultees did not have email addresses.

**5.4** Appendix One gives a full list of statutory consultees who provided a response to this consultation.

### **How were they invited to make representations?**

#### Consultation documents

**5.5** The consultation documents consisted of:

- The Revised Draft Adur Local Plan 2013;
- A short summary leaflet explaining the role of the Local Plan, the key allocations and details of the consultation exercise;
- A consultation form for responses<sup>2</sup>, with separate equalities monitoring form;
- A Background Evidence Document;
- The Sustainability Appraisal;
- Sequential Test and Exception Test of sites included in the Plan; and
- A Draft Infrastructure Delivery Plan.

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<sup>1</sup> Due to the level of interest generated, the period for submitting representations was extended by two weeks.

<sup>2</sup> Representations not using this form were also accepted.

These documents can be found on the Council's website [www.adur-worthing.gov.uk/adur-local-plan-consultation/2013-consultation](http://www.adur-worthing.gov.uk/adur-local-plan-consultation/2013-consultation)

**5.6** As in the case of the 2012 Local Plan, the whole document was open to consultation. The key issues were:

- A housing provision target of 2797-2947 dwellings between 2011-2031;
- The allocation of New Monks Farm for 450-600 homes, 10,000 square metres of employment generating floorspace, and community infrastructure;
- The allocation of land at West Sompting for 480 dwellings, and
- The allocation of 38,000 square metres of land for employment generating uses at Shoreham Airport, New Monks Farm and Shoreham Harbour.

### Media

**5.7** Adverts publicising the consultation exercise appeared in two local weekly newspapers fortnightly through the six week consultation period. Articles about the Local Plan appeared for one week in the weekly Shoreham Herald and twice in the weekly Lancing Herald, at the very beginning of the six week period. In addition, one officer was videoed explaining the Local Plan consultation and how to respond. This was posted on the newspaper's website for approximately one week.

**5.8** During the six week consultation period, Council officers posted on Twitter four times and Facebook 12 times. This was used to publicise the consultation exercise as a whole and also individual events during it, for example, the presence of the exhibition and staff at the Shoreham Farmers Market. Various community organisations, members of the public and local MPs also used social media to refer to the Local Plan during the six week period.

### Exhibitions, presentations and events attended by officers

**5.9** An exhibition was set up consisting of information boards relating to the Plan and its proposals, with additional material to assist people in making their representations. Two copies of the exhibition were produced to increase the amount of time it could be available in different locations over the six week period. Each of the District's four community centres was used as a venue in addition to the Council's offices and for one morning only, the Shoreham Farmers Market. The exhibitions were manned by Planning Policy Officers on certain days. These were advertised in advance.

**5.10** Officers attended a range of meetings to publicise and explain the Local Plan consultation. These were with the Shoreham Airport Consultative Committee; Sompting Parish Council; Lancing Parish Council; Adur and Worthing Business Partnership and the Shoreham Society.

### **A summary of the main issues raised as a result of the consultation**

**5.11** In the region of 1100 responses were received from individuals, businesses and stakeholders. These included standard response letters distributed by residents, community groups, and local political organisations. Both the local Conservative Party office and local Liberal Democrat Party office forwarded representations that



had been passed to them by residents. In addition, a petition entitled “Keep the Gaps on the Map” was submitted containing 378 signatures and comments.

**5.12** A database of representations, standard responses to frequently raised issues, and an Interim Statement of Consultation were made available on the Council’s website, ([www.adur-worthing.gov.uk/adur-local-plan-consultation/](http://www.adur-worthing.gov.uk/adur-local-plan-consultation/)) following the consultation period. By far the most representations were received in relation to development at West Sompting, followed by New Monks Farm and Shoreham Airport.

**5.13** The key issues raised were:

#### Overall housing provision

- Develop brownfield sites instead of greenfield;
- Concerns about impact of development on social cohesion and infrastructure;
- Where is demand for the housing coming from?

#### New Monks Farm

- The site is an established flood plain so development here will affect surrounding areas;
- Concern regarding conflict between development and airport safety and noise;
- Unacceptable strain will be placed on roads and infrastructure;
- Impact on wildlife and habitats.

#### West Sompting

- Existing traffic congestion will be made worse;
- Development will be detrimental to the character of Sompting;
- Strain on infrastructure;
- Will there be enough jobs locally for new residents or will commuting increase?
- Danger to pedestrians of increased traffic in an area lacking pavements.

#### Shoreham Airport

- Concerns about feasibility of a roundabout onto A27 instead of traffic lights;
- Development may impact on future prospects for the Airport and existing businesses;
- Increased risk of flooding in surrounding areas;
- Impact on roads and on wildlife and habitats.

#### Shoreham Harbour

- Need to consider marine habitats and water quality issues;
- Concerns from local businesses about relocating;
- Need for improved walkways and cycle routes as well as an all tide public slipway;
- Impact of regeneration on the historic culture of Shoreham Harbour.

## Countryside and Coast

- The function of the local green gaps is not transparent in the Plan;
- Landscape views should be protected as much as possible.

### **How the issues were addressed**

**5.14** For a variety of reasons (including the need to deliver Adur's Objectively Assessed Needs for housing, constraints to the Local Plan area, the Council's evidence base, and a lack of suitable, alternative sites) the allocations for West Sompting and New Monks Farm remain in the Plan. However text accompanying Policy 3: Housing has been clarified further to explain that brownfield sources of housing will be utilised, and explains how they have been taken into account, and how much housing they are likely to deliver over the Plan period. The implementation of the Shoreham Adur Tidal Walls is not expected to address or alleviate the groundwater issues affecting the Hasler (West Beach) estate, and as a result this site remains excluded from the Plan. The supporting text for the strategic allocations has been checked to ensure it makes clear the precise flood zone each site lies within, and refers to the Sequential and Exceptions test (which has been published alongside previous versions of the Local Plan, as well as the Proposed Submission Adur Local Plan 2014). Policy 5 New Monks Farm has been amended to clarify that delivery of the upper end of the proposed housing figure for this site is subject to demonstration to the satisfaction of the Local Planning Authority that there is no adverse impact on biodiversity and landscape.

**5.15** Further detailed work regarding traffic impact (and mitigation) has been commissioned by the site promoters of West Sompting. The Plan makes clear that the strategic sites will be expected to mitigate their impact on the strategic and local road network, and includes references to specific junctions where these mitigations will be required. Work with infrastructure providers has been ongoing and is addressed in the Infrastructure Delivery Plan 2014 which accompanies the Proposed Submission Adur Local Plan 2014.

**5.16** Issues relating to the Shoreham Harbour regeneration area will be addressed in detail through the emerging Shoreham Harbour Joint Area Action Plan.

**5.17** Within the Proposed Submission Adur Local Plan 2014 Policy 13: 'Adur's Countryside and Coast' has been amended, and a new policy (Policy 14 Local Green Gaps) has been created to ensure clarity relating to the aims of these two policies.

## **6. Proposed Submission Adur Local Plan 2014**

20th October – 1st December 2014

### **A brief introduction to the consultation**

**6.1** In accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Adur & Worthing Statement of Community Involvement (2012), the Council published the Proposed Submission Adur Local Plan on 20th October 2014 for a six week consultation period.

**6.2** The Proposed Submission Adur Local Plan 2014 sets a vision for Adur up to 2031. It contains strategic planning policies to deliver new homes, jobs and infrastructure. These policies and principles will shape the future of the area and will be used in the consideration of planning applications. The Plan covers that part of Adur District which lies outside the South Downs National Park.

**6.3** This version of the Plan included a revised housing provision target of 3488-3638 dwellings between 2011-2031 representing an increase from the previous version of the Plan due to an increased number of dwellings completed and sites where planning permission has been granted. The allocations at New Monks Farm and land at West Sompting remain unchanged in terms of the level of housing proposed.

**6.4** At the time of publication the Council intended to submit this version of the Local Plan to the Secretary of State for Communities and Local Government. Therefore representations were invited relating to the tests of soundness.

### **Who was invited to make representations?**

**6.5** Approximately 1800 bodies or individuals on the consultation database were sent information by email or post regarding the publication arrangements. The Councils' Twitter and Facebook pages were also used to publicise the Plan.

**6.6** In order to reach the wider public, paper copies of the Proposed Submission Adur Local Plan 2014, the Policies Map, response forms and supporting documents were made available at the Council's offices in Shoreham-by-Sea, on its website, and at the three District libraries. Reference copies were also placed at Sompting Parish Council and Lancing Parish Council.

**6.7** Appendix One gives a full list of statutory consultees who submitted a representation.

### **How were they invited to make representations?**

#### Publication documents

**6.8** The consultation documents consisted of:

- Statement of Representation Procedures

- Proposed Submission Adur Local Plan 2014 (including Appendices, Policies Map and Inset Map)
- Background Evidence Document
- Sustainability Appraisal
- Statement of Consultation 2014
- Habitat Regulations Assessment (HRA) Screening Opinion and Addendum
- Sequential and Exception Test
- Housing Implementation Strategy 2014
- Adur Strategic Housing Land Availability Assessment 2014 (SHLAA)
- Adur Duty to Co-operate Statement 2014
- Adur Equalities and Health Impact Assessment 2014
- Infrastructure Delivery Plan 2014
- Evidence studies
- Frequently asked questions

These documents can be found on the Council's website [www.adur-worthing.gov.uk/adur-ldf/adur-local-plan/](http://www.adur-worthing.gov.uk/adur-ldf/adur-local-plan/)

### **A summary of the main issues raised as a result of the consultation**

**6.9** A total of 42 responses were received from a variety of stakeholders including organisations, businesses and residents on the Local Plan. These can be viewed in full on the Council's website [www.adur-worthing.gov.uk/adur-ldf/adur-local-plan/](http://www.adur-worthing.gov.uk/adur-ldf/adur-local-plan/)

**6.10** The key issues raised were:

#### Overall Housing Provision

- Insufficient sites have been taken forward to meet identified need;
- The allocation of greenfield sites is unsustainable.

#### New Monks Farm

- The indicative location of the roundabout to serve this site and Shoreham Airport is not the most appropriate option;
- The retention of local green gaps is not supported by national planning policy.

#### West Sompting

- Traffic generated by the development and proposed traffic calming measures will increase congestion impacting on local air quality;
- The site will further erode the green gaps between Worthing and Sompting.

#### Shoreham Airport

- The level of development is unviable and should be increased;

- Local of development within the site should be reconsidered due to impacts on ecology and views across the airport.

### Countryside and Coast

- Insufficient landscape evidence to justify the approach of Policy 13;
- The distinction between Policies 13 and 14 is unclear.

### Development Management

- Policies need reviewing to take account of the Housing Standards Review;
- Affordable housing rates are unjustified;
- Policy 26 provides no flexibility and fails to recognise other employment generating uses;
- It is unclear how applicants will afford open space requirements.

### **How the issues were addressed**

**6.11** As a result of the issues raised with regard to the New Monks Farm allocation, the progression of the plan was put on hold, and not submitted in March 2015 as previously intended. The opportunity was taken to refine the Plan's evidence base and, further work was commissioned in relation to transport, landscape and development viability. In addition, work in relation to Adur's Objectively Assessed Needs figure has been updated.

**6.12** Before progressing the Plan further, a brief, focussed consultation exercise took place (under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 ) in December 2015/January 2016, in relation to the proposed allocation at New Monks Farm, an area where development of 600 homes, employment space, a country park and a new school are proposed.

## **7. Proposed Amendments to the New Monks Farm Allocation within the Proposed Submission Adur Local Plan 2014.**

9th December 2015 – midnight 4th January 2016

### **A brief introduction to the consultation**

**7.1** As a result of the publication (October – December 2014) of the Proposed Submission Adur Local Plan 2014 under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, some representations submitted to the Council proposed changes to the strategic allocation of New Monks Farm in the Plan. The allocation in the Proposed Submission Plan was for mixed use development of between 450 and 600 new homes, a community hub, land for a new primary school, 10,000 sq m employment generating floorspace, a new access on to the A27 and a country park. The Council considered these representations and proposed some changes to the allocation. The main proposed changes relate to the following:

- 1) The number of dwellings proposed is 600 (rather than 450-600)
- 2) The indicative location of the proposed roundabout is moved eastwards to a more central location between Shoreham (Brighton City) Airport and the New Monks Farm allocation.
- 3) The existing Withy Patch Gypsy and Travellers site is relocated westwards (to allow for the revised roundabout location). Relocation also provides an opportunity to improve the site and facilities, address flood risk and enable some limited future expansion to meet identified needs from within Withy Patch.
- 4) The site allocation boundary is amended, to include the existing Withy Patch site. Including this area within the site boundary will mean that the relocated site and flood risk improvements will be delivered as part of the development at New Monks Farm.
- 5) The proposed Built Up Area Boundary amendment (between the proposed built up area of New Monks Farm, and the proposed country park) is shown as indicative; the final boundary will be determined at planning application stage based on landscape and drainage assessments.

**7.2** Advice was sought from the Planning Advisory Service, and it was agreed that rather than submit the Plan to the Planning Inspectorate with the recommended changes, it was appropriate that further consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 be undertaken. This was seen as particularly important with regards to the residents of the Withy Patch Gypsy and Travellers site, which would be significantly affected by the proposal for a centrally-located roundabout. However a wider consultation exercise was carried out, to ensure the proposals received wider publicity.

**7.3** A brief, focussed consultation exercise was undertaken (under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012) to allow consideration of these proposed changes to the site allocation. This consultation took place from 9 December 2015 to 4 January 2016.

### **Who was invited to make representations?**

**7.4** All organisations (including statutory consultees/individuals) on the Local Plan consultation database (approximately 1800) were emailed/ posted a newsletter in advance of the consultation to inform them of this consultation exercise.

**7.5** In order to reach the wider public, a consultation page was set up on the Council's website, information was posted on the Councils' Twitter and Facebook pages and hard copies of the newsletter and consultation leaflet were left at Lancing Parish Council (as the relevant allocation is located in Lancing), all libraries in Adur, at the Shoreham Centre and the Adur Civic Centre.

**7.6** Residents of the Withy Patch Gypsy and Travellers site as well as representatives of the site management company were invited to two meetings (one at Withy Patch), to ensure that those affected by the potential relocation of the site were aware of the proposals.

**7.7** Appendix One gives a full list of statutory consultees who submitted a representation.

### **How were they invited to make representations?**

**7.8** The consultation was carried out as follows:

- A meeting was held at the Withy Patch Gypsy and Travellers site, to ensure that those affected by the potential relocation of the site were aware of the proposals, and had the opportunity to make comments/ raise any concerns. Residents and representatives of the site management company attended this meeting. A further session for residents was also arranged, but was unattended.
- A meeting was held with a representative of a residents group, local to the allocation.
- All organisations/individuals on the Local Plan consultation database (approximately 1800) were emailed/ posted a newsletter in advance of the consultation to inform them of this consultation stage and make clear that paper copies of the consultation leaflet could be sent out on request.
- A consultation page was set up on the Council's website (with a tile 'link' from the main homepage). The consultation leaflet was available to view on this page.
- Hard copies of the newsletter and consultation leaflet were left at Lancing Parish Council (as the relevant allocation is located in Lancing), all libraries in Adur, at the Shoreham Centre, Pond Road Shoreham, and the Adur Civic Centre (before its closure to the public).
- Information was also posted on the Council's Facebook page and Twitter feed.

**7.9** This approach is consistent with both the relevant Regulations, and the Adur and Worthing Statement of Community Involvement (2012).

### **A summary of the main issues raised as a result of the consultation**

**7.10** Responses were received from 29 individuals and organisations/ companies. These can be viewed in full on the Council's website [www.adur-worthing.gov.uk/adur-ldf/adur-local-plan/](http://www.adur-worthing.gov.uk/adur-ldf/adur-local-plan/)

**7.11** The key issues raised in relation to the proposed changes were:

#### The number of homes

- Explicit support for the proposed 600 homes since this aids viability, helps to meet housing need, makes best use of land and demonstrates positive planning.
- Oppose on grounds of lack of flexibility, and potential adverse impact on biodiversity.
- Other comments were made in relation drainage issues.

#### New indicative location for the roundabout

- Explicit support for the new location.
- Specific concern by Historic England due to potential impact on heritage asset (SAM); wish to be involved in discussions at an early stage.
- General points made regarding traffic volumes, drainage, and specific queries relating to speed management etc. - not directly related to merits of revised location of the roundabout.

#### Amending the site allocation boundary to include the existing site of Withy Patch

- Drainage concerns
- The Environment Agency has no concerns in principle with the potential relocation of Withy Patch providing there is betterment in terms of flood risk and that for any future expansion of the site, land raising is carried out prior to any application for additional pitches.

#### The location of the relocated Withy Patch site

- Explicit support for the location
- Drainage concerns
- Residents of the Withy Patch site (those who attended the consultation meeting) were broadly supportive, and provided some useful suggestions with regards to the layout and facilities of the relocated site.



### An indicative rather than detailed Built Up Area Boundary

- Support for the approach as it allows for appropriate flexibility. (A detailed boundary can be determined at application stage, based on drainage, landscape, ecology and other relevant evidence).

### **How the issues were addressed**

**7.12** Following the consultation exercise and analysis of the responses received, the Council agreed in March 2016 that the amendments set out above in paragraph 7.1 are incorporated into the Adur Local Plan.

**7.13** General points made during consultation regarding traffic volumes, drainage, and specific queries relating to speed management etc. would be addressed through a Transport Assessment in due course. With regard to the specific concern by Historic England on the potential impact on heritage asset (SAM), an assessment of heritage assets is currently being undertaken to address this matter further.

**7.14** Amendments to the Proposed Submission Adur Local Plan (2016) will be published for representations (Under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012) between 31<sup>st</sup> March and 11<sup>th</sup> May 2016. This document will include amendments resulting from some representations received to the Proposed Submission Adur Local Plan 2014, changes in Government policy and to reflect new evidence. The amendments will reflect changes to the New Monks Farm allocation referred to above in paragraph 7.1.

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

31st March 2016 – midnight 11th May 2016

### **A brief introduction to the consultation**

- 8.1** Following the previous Regulation 18 consultation (9th December 2015 to 4th January 2016) on the proposed amendments to the strategic allocation at New Monks Farm, changes to the strategic allocation were incorporated into a revised version of the Local Plan called “Amendments to the Proposed Submission Adur Local Plan (2016)”. This document also included amendments in relation to other matters raised in representations made during the statutory publication period for the Proposed Submission Adur Local Plan 2014. In addition, information was updated, text was clarified, corrections were made to drafting errors, and changes were made in response to changing Government policy.
- 8.2** The revised version of the Local Plan “Amendments to the Proposed Adur Local Plan (2016)” was formally published under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 from 31st March 2016 to midnight on 11th May 2016 (see Appendix Three) to allow representation to be made as to whether the amendments met the “Tests of Soundness” and/or are legally compliant.
- 8.3** The amendments were clearly indicated with the use of bold and underlined text for additions, and “strikethrough” text for deletions. In addition, a separate “Schedule of Changes” document was produced to explain why each change was made.
- 8.4** Key changes include:
- 8.4.1** Within Part One, The Adur Local Plan (which sets out the Vision and Objectives of the Plan which will be delivered through the policies in the plan): an update on the progression of the plan, the Local Strategic Statement, proposals of Highways England, the Shoreham Adur Tidal Walls, and references to evidence.
- 8.4.2** Within Part Two, A Strategy for Change and Prosperity (which sets out the strategy of the Plan to facilitate Adur’s regeneration and the provision of housing and employment land):
- a) updated housing provision figures. These take into account the recommendation for 291 dwellings per annum (5,820 over the plan period) determined by the new “Objectively Assessed Needs” after consideration of all land available for housing (including brownfield), the housing delivery target of 180 dwellings per annum (3,609 over the plan period) which leaves a shortfall of 2211 dwellings over the plan period;
  - b) Strategic Allocation: New Monks Farm (Policy 5 and supporting text) –

Incorporation of the main proposed changes (see previous section) including:

- the number of dwellings is now given as 600;
- relocation of the proposed roundabout eastwards to a more central location between Shoreham Airport and the New Monks Farm allocation;
- relocation of the existing Withy Patch travellers' site to allow for the revised roundabout location and enable improvements to the travellers' site (reduced flood risk and improved facilities with the potential for limited future expansion to meet identified);
- amendment of the site allocation boundary to reflect the above changes;
- an "indicative" Built Up Area Boundary between the proposed development and country park (to allow the final boundary to be determined at the planning application stage based on landscape and drainage assessments).

c) Strategic Allocation: West Sompting (Policy 6 and supporting text) – minor amendments including:

- o clarification that two youth football pitches are required as part of the development;
- o a financial contribution towards the provision of educational facilities is required.

d) Shoreham Airport (Policy 7 and supporting text) – amendments including:

- o clarifying that the preferred site for a proposed roundabout is centrally located between New Monks Farm and Shoreham Airport, with a reconfigured access at Sussex Pad;
- o clarifying that a Flood Risk Assessment required at planning application stage must take account of and seek to facilitate relevant recommendations of the Surface Water Management Plan for the Lancing Area

In addition, the opportunity has been taken to:

- o seek to ensure that any new development at the airport must not jeopardise the runway use and airport operations;
- o protect airside aviation-related B1, B2 and B8/hanger uses within the existing developed area at the southern end of the Airport;
- o support non-airside development for aviation and non-aviation related B1, B2 and B8/hanger uses.

e) Shoreham Harbour Regeneration Area (Policy 8 and supporting text) – amendments including:

- o updating character area priorities to reflect the emerging Joint Area Action Plan, including designating strategic sites at Southwick Waterfront and the Western Harbour Arm;
- o specifying acceptable land uses;
- o providing additional detail on infrastructure requirements, including transport improvements and green infrastructure

8.4.3 Within Part Three, Policies for Places (which are area-based policies for Lancing, Sompting, Shoreham-by-Sea, Southwick and Fishersgate, Adur's countryside and Coast (not including the National Park), and Local Green Gaps, which relate to place-specific issues and proposals), key amendments include:

- updating text to reflect the adoption of a development brief for the Former Eastbrook Allotments site;

In addition, the opportunity has been taken to:

- recognise the contribution of the Shoreham Adur Tidal Walls scheme to reducing flood risk in Shoreham town centre;
- make it clear that the Council is working with West Sussex County Council to address the need for suitable education provision arising from growth in the Shoreham area;
- highlight the important contribution of gaps to the character of the district;

8.4.4 Within Part Four, Development Management Policies (which are detailed policies on particular topics to be used, in conjunction with the Plan's Vision, Objectives and other relevant Policies, to assess planning applications), key changes include:

- deletion of Policy 18: The Energy Hierarchy and its supporting text in its entirety; following the Government's Housing Standards Review energy efficiency in new homes will be addressed by Building Regulations;
- amendment of Policy 19: Sustainable Design and its supporting text to take account of the Housing Standards Review and the proposed amendment to the Planning and Energy Act 2008. This policy no longer refers to the Code for Sustainable Homes. Added to the Policy is the inclusion of the Government's higher water efficiency standard of no more than 110 litres/person/day in areas of water stress (such as within Adur).
- addition to Policy 20: Decentralised Energy, Stand-alone Energy and Renewable Energy, and its supporting text. This policy now refers to the Shoreham Harbour Heat Network Study (2016) and expects new developments (where viable and feasible) to connect to district heating networks. Stand-alone energy schemes will also be supported (subject to compliance with other Plan policies); and all new major development will be expected to incorporate renewable/ low carbon energy production equipment to provide at least 10% of predicted energy requirements;
- updates to Policy 21: Housing Mix and Quality, and to its supporting text, to reflect the findings of the Objectively Assessed Need for Housing report (2015). Changes include: setting the starting point for negotiations on housing mix

;additional text to make clear that the Council will encourage all new homes to be built to the higher optional Building Regulation standard M4(2), Accessible and Adaptable Dwellings, where possible, and will apply it as a planning condition to development where viability is not compromised. This seeks to address the needs of an ageing population.

Policy 21 has also been amended to ensure that the Government's recent national minimum space standards (Technical Housing Standards March 2015) will be applied to new dwellings, and confines the use of Adur's own internal space standards to conversions for residential use;

- changes to the supporting text of Policy 22: Affordable Housing to reflect the findings of the Objectively Assessed Housing Needs for Adur report (2015). The mix of affordable housing recommended remains unchanged, and the mix of tenures sought in Policy 22 has changed marginally to:
  - 25% intermediate
  - 75% social/affordable rented;
- updates to the supporting text of Policy 24: Provision for Gypsies, Travellers and Travelling Showpeople reflect the proposed changes in relation to the New Monks Farm strategic allocation and revised roundabout location referred to above;
- amendment to Policy 26: Protecting and Enhancing Existing Employment Sites and Premises to provide clarity and allow for more flexibility for appropriate non B-class employment generating uses;

8.4.5 Within Part Five, Appendices (which contains additional information on matters including monitoring and delivery, and a schedule of changes to the Policies Map), key changes include amendments to the Policies Map as follows:

- revision to the New Monks Farm strategic allocation boundary, to incorporate the revised roundabout location and current location of Withy Patch travellers site;
- relocation of the symbol representing the proposed roundabout to its indicative revised location
- an indicative (instead of final) Built Up Area Boundary at New Monks Farm between the proposed housing area and country park; the final boundary will be determined through the planning application process, based on detailed landscape and drainage evidence;

### **Who was invited to make representations?**

8.6 All organisations (including statutory consultees/individuals) on the Local Plan consultation database (approximately 1800) were sent information by email or post in advance of the consultation to inform them of the consultation.

8.7 In order to reach the wider public:

- a consultation page was set up on the Council's website;
- information was posted on the Councils' Twitter and Facebook pages;

- hard copies of the consultation documents (see below) were made available at all libraries in Adur, at the Shoreham Centre, and at the Parish Councils of Sompting and Lancing.

**8.8** Appendix One gives a full list of statutory consultees who submitted a representation. A representation form was downloadable from the website and hard copies were placed at all locations where the publication documents were available for inspection. Hard copies could also be posted out on request.

**8.9** This approach is consistent with both the relevant Regulations, and the Adur and Worthing Statement of Community Involvement (2012).

### **How were they invited to make representations?**

**8.10** The publication documents made available in hard copy for inspection, and also electronically on the Councils' website, comprised:

#### Main documents:

- Statement of Representation Procedures
- Guidance note on completion of Representation Form – Adur Local Plan 2016
- Representation Form
- Amendments to the Proposed Submission Adur Local Plan (2016) including Policies Map and Inset Map
- Adur Local Plan 2016 – Schedule of Changes

#### Supporting documents:

- Adur Local Plan 2016 – Sustainability Appraisal, including non-technical summary and technical appendices
- Adur Habitats Regulations Assessment (HRA) – September 2012 and addendum 2016
- Adur Infrastructure Delivery Plan 2016
- Adur Local Plan 2016 – Sequential and Exception Test
- Housing Implementation Strategy 2016
- Adur Strategic Housing Land Availability Assessment (SHLAA) – update 2015
- Adur Duty to Co-operate Statement 2016
- Adur Equalities and Health Impact Assessment 2016
- Adur Local Plan 2016 Statement of Consultation
- Adur Local Plan 2016 – Questions and Answers

Further background studies and information that informed the Local Plan could be found on the Councils' website.

## **A summary of the main issues raised as a result of the consultation**

**8.11** Responses were received from 28 individuals and organisations/companies. These can be viewed in full on the Council's website [www.adur-worthing.gov.uk/adur-ldf/adur-local-plan/](http://www.adur-worthing.gov.uk/adur-ldf/adur-local-plan/). A summary of representations, and officer-level responses can be found at Appendix 4.

**8.12** The issues raised are presented under theme headings below. (*Brief summaries of all representations received in response to this publication stage in 2016 may be found in Appendix 4 of this document*).

### **Whole Plan, Housing and the Duty to Co-operate**

The Plan is unsound because:

- it is not positively prepared as it does not meet Objectively Assessed Need, (OAN), and furthermore the assessment of OAN is flawed resulting in an underestimation of need;
- it is not justified as it has not considered all reasonable alternatives to meet OAN and cannot be considered the most appropriate strategy;
- it is not effective as it is not deliverable over its period, and it fails to meet OAN;

It is not consistent with policies in the National Planning Policy Framework (NPPF).

It is contended that the District does not have a Five Year Housing Supply. The Plan does not contribute to meeting the shortfall in housing provision from other Local Authorities within the wider housing market area.

It is contended that development is unlikely to come forward in the short to medium term as proposed because;

- there is an over reliance on Shoreham Harbour (Policy 8) which has flood defence, transport mitigation, land assembly for relocation, and potential contaminated land issues;
- there is an overreliance on New Monks Farm (Policy 5) which has various constraints (landscape, flood risk, waste-water drainage, transport matters, and proximity to Shoreham Airport (Policy 7) with shared transport infrastructure);
- the "windfall allowance" is too high.

Some representations proposed that more land for housing should be allocated to address the Plan's housing provision deficiency and to support housing delivery at the expected rate. Specific sites were put forward, (Mill Hill, Shoreham Gateway site, New Salts Farm and Old Salts Farm) some with additional information about how potential issues (such as flooding, access, open space and landscape) could be addressed.

## **Sustainability Appraisal**

The Sustainability Appraisal:

- needs to be updated to take account of the Adur Tidal Walls
- has been inconsistent in its assessment of site options, particularly in respect of landscape and flood risk.
- has failed to adequately assess reasonable alternative locations for development.

## **Sequential and Exception Test**

The Sequential Test accompanying the Adur Local Plan requires updating to take account of Adur Tidal Walls which will change the flood zone of some sites.

The Exception Test accompanying the Adur Local Plan lacks detail in regards to maximum on-site water levels and flood depths/velocities for the design tidal flood event in order to assess the viability of mitigation measures.

## **Flood risk, surface water, groundwater, and drainage issues**

Re Policy 7 (Shoreham Airport)

- There is concern that the Shoreham Airport site is not suitable for development given its role as flood zone 3b.

Re Policy 5 (New Monks Farm):

- The Council has been inconsistent in its approach to increased third party flood risk from groundwater disruption and an inadequate surface water management plan; it has previously refused applications because of drainage issues on parts of the sites it has now allocated in Policy 5.
- Further assessment to determine the potential flood-risk elsewhere as a result of development at New Monks Farm needs to be undertaken before the site is allocated in the plan.
- A Flood Risk Assessment should be undertaken by Adur District Council and West Sussex County Council for the specific area known as New Monks Farm before any planning applications are considered.
- Development at New Monks Farm is in conflict with the conclusions of the Surface Water Management Plan (SWMP).
- Reference to the Lancing SWMP is welcomed.
- The Lancing Surface Water Management Plan (SWMP) made many recommendations for the whole of Lancing, but not specifically for New Monks Farm.

Re sewerage:

- Assessment of the capacity of the local sewerage infrastructure to accommodate a major development should be made prior to allocating Monks Farm in the Plan.



- The drainage system near New Monks Farm is already fragile and overstretched; during periods of excessive rainfall and surface run off pumps have had to be installed to stop sewage entering homes.
- New Monks Farm development should be connected to the mains sewerage system unless all options for connection to the public sewerage network have been fully explored.
- Equal preference should be given to connection to a public sewer or sewerage treatment plant so as to provide more flexibility for the development of New Monks Farm.

### **Landscape, the Coast, and Heritage Issues**

- Some respondents disagree with the degree of sensitivity attributed to sites in the Landscape Studies. They are concerned that the District's landscape studies are not reliable.
- The strategic allocations at New Monks Farm (Policy 5) and West Sompting (Policy 6) undermine Policy 14 (Local Green Gaps) by further eroding them. Policy 14 (Local Green Gaps) inhibits land coming forward for development; green gaps have incorrectly been accorded more weight than meeting OAN and the landscape and visual impact issues have been overstated.
- Whilst it is recognised that a centrally located roundabout and new road between New Monks Farm and Shoreham Airport is desirable, their exact location needs to have regard to a Scheduled Ancient Monument, and also a spring.
- Policy 16 (A Strategic Approach to the Historic Environment) is supported.

### **Environmental issues**

General / overarching recognition of issues:

- Support for Objective 6 which recognises the need to increase natural capital, but uncertainty as to how this is being achieved with the building of 3609 dwellings.
- Overarching concern that the policies in Part Three (Policies for Places) fail to encapsulate importance of the Council's commitment to add to natural capital.

Re Strategic Allocations

Policy 5: New Monks Farm Lancing:

- The allocation at Monks Farm (Policy 5) is concerning given the biodiversity and flood risk issues in the area, and it's unlikely contribution to a gain in natural capital.
- It is not clear who is going to manage the riparian network in the strategic allocation at New Monks Farm (para 2.48).
- Support the requirement that a site wide landscape and ecological management plan is produced "to the satisfaction of the local planning authority" but would request the stipulation that ecological plans need to be based on up to date evidence.

Policy 6: Land at West Sompting:

- Welcome the inclusion of biodiversity enhancements, green gap access, and sustainable transport links in Policy 6.
- Policy 6 should refer to the expansion of Cokeham Brooks SNCI as per para 2.61 and the supporting policies map.

Policy 7: Shoreham Airport:

- Support for Policy 7 (Shoreham Airport) recognising that the site supports wintering and wading birds.

Policy 8: Shoreham Harbour Regeneration Area

- Policy 8 does not recognise the potential increase in visitor pressure on sites such as Widewater Lagoon LNR and Shoreham Beach LNR; policy should seek developer contributions for long term management and monitoring of these sites particularly given the presence of highly sensitive vegetated shingle habitat.
- Policy 8 should seek “a suite of ecological enhancements” including off-site biodiversity gains.

## **Economic Issues**

- Support is given for the flexibility in employment afforded by Policy 4 (Planning for Economic Growth).
- Setting a maximum limit on employment generating floorspace in Policy 4 is too restrictive.
- Policy 5 (New Monks Farm) is not sufficiently flexible.

## **Infrastructure**

Transport infrastructure:

- Agreement that transport mitigation measures will be required at various junctions to enable West Sompting development (Policy 6), and that a Transport Assessment will be required. It will be necessary to ensure that developments at New Monks Farm, West Sompting and Shoreham Airport contribute to A27 improvements and do not detrimentally effect its current operation.
- There is support for a centrally located roundabout; this should also be referred to in the text of Policy 5 (Monks Farm).
- If a new centrally located roundabout is built then a grade separated crossing may be required to maintain safety and minimise traffic delays.
- It is not appropriate to secure the infrastructure requirements for Policy 5 (New Monks Farm) through both Section 106 and CIL. Instead the level of contributions will need to be negotiated.

#### Green infrastructure:

- Support for additions to character areas in Policy 8 (Shoreham Harbour) that support improvements to green infrastructure.
- Support for Policy 31 which required developers to show how their proposed development delivers green infrastructure on site and links to/enhances the wider green infrastructure network.

#### Sports, recreation and open space provision:

- The amendments to Policy 33 are supported;
- The amendments are inflexible – only “significant” loss of open space should be required to be replaced by equivalent or improved provision;
- The policy as a whole is unjustified in the context of unmet OAN.

#### Education:

- Education should be referenced in Vision 4;
- It should be made clear that a financial contribution towards the provision of education facilities will be sought in Policy 5 (New Monks Farm);
- It should be clear that suitable education will be provided in Policy 8 (Shoreham Harbour Regeneration Area);
- Reference (para 3.29) to the Council and WSCC working together to address education provision in Shoreham (Policy 11) that arises from growth is welcomed.

#### Shoreham Airport:

- Policy 7 paragraph 6 should treat both airside and non-airside uses in the same way.
- The inclusion of “Hanger Uses” in Policy 7 (Shoreham Airport) is supported.

#### Gypsy and Traveller Site Provision:

- More clarity on the relocation of Withy Patch should be given.

### **Development Management Policies**

- The Council should simplify the guidance that it requires developers to observe in Policy 15 (Quality of the Built Environment and Public Realm Standards).
- Policy 21 (Housing Mix and Quality):
  - does not provide enough flexibility; it is more appropriate to consider this on a site specific basis;
  - is unjustified in requiring the Optional Technical Standard for Accessible and Adaptable Dwellings to be met on all dwellings
  - is unjustified in requiring compliance with the Development Control Standard “Flat Conversions”
- Policy 22 (Affordable Housing):

- The tenure split should be 50/50;
- The tenure split should be reconsidered in the light of the Housing and Planning Act 2016 and the Starter Homes initiative;

### **8.13 How the issues were addressed**

Following analysis of the representations the following actions have been undertaken in response:

- An update of the Objectively Assessed Housing Need work has been carried out. (Objectively Assessed Housing Need Update 2016). This is based on population and household projections published in 2016. The Study makes adjustments to the demographic 'starting point' figure, to reflect market issues and affordability. This has resulted in a revised OAN figure for Adur, which is addressed in Proposed Major Modifications to the Plan. The study has also taken the opportunity to look at potential demand for starter homes.
- The Duty to Co-operate Statement has been updated, to reflect the emerging Local Strategic Statement 3, and initial background work.
- Further consideration of additional sites referred to in the 2016 representations has been undertaken. However, it is not thought appropriate to amend the plan to include these.
- The Adur Whole Plan Viability, CIL and Strategic Sites work is being updated.
- Modifications in relation to Starter Homes have not been proposed by the Council at this stage, as the Regulations have not yet been published.
- Major Modifications have been proposed (See Proposed Major Modifications document at [www.adur-worthing.gov.uk/alp-submission-2016/](http://www.adur-worthing.gov.uk/alp-submission-2016/) ). This includes changes to:
  - Extend the end date of the Plan until 2032
  - Revising the Objectively Assessed Needs figure (OAN) to 325 dwellings per annum
  - Update of housing mix (to reflect most recent evidence).
  - Changes to some place-based policies to allow appropriate D1 uses in retail frontages in certain circumstances.

## **9. Sustainability Appraisal**

### **Introduction**

**9.1** A Sustainability Appraisal (SA) has accompanied every Core Strategy/Local Plan consultation document set out in this Statement other than the Regulation 18 consultation undertaken in 2015 proposing amendments to the New Monks Farm policy/site allocation. These proposed amendments to the New Monks Farm policy were appraised subsequent to the consultation and the details and results of this appraisal are set out in the SA of the Amendments to the Proposed Submission Adur Local Plan (2016).

**9.2** Prior to the 2011 Core Strategy consultation, a Sustainability Appraisal Scoping Report was produced which set out the baseline situation in the district, the various social, economic and environmental issues and also set out the Sustainability Appraisal Framework including the Sustainability Objectives. The five key stages of consultation on the SA were as follows:

1. Sustainability Appraisal Scoping Report May 2011
2. Sustainability Appraisal of the Core Strategy Housing and Employment Options Paper June 2011
3. Sustainability Appraisal of the Draft Adur Local Plan September 2012
4. Sustainability Appraisal of the Revised Draft Adur Local Plan 2013
5. Sustainability Appraisal of the Adur Local Plan (September 2014)
6. Sustainability Appraisal of the Adur Local Plan (March 2016)

### **Who was invited to make representations?**

**9.3** Due to its fairly specific nature, the consultation on the Sustainability Appraisal Scoping Report was aimed at the key consultation bodies as set out in The Environmental Assessment of Plans and Programmes Regulations 2004 – Natural England, Historic England and the Environment Agency. However, in order to ensure that wider interests were also taken into account, given the environmental, social and economic factors taken into account in a Sustainability Appraisal the following were also consulted:

- Adur & Worthing Business Partnership
- Sussex Wildlife Trust
- Highways Agency (now Highways England)
- Sport England
- West Sussex County Council
- Neighbouring authorities including Brighton & Hove City Council, Arun District Council, Worthing Borough Council and the South Downs National Park Authority.

**9.4** Other than the aforementioned Scoping report consultation, every consultation on the Sustainability Appraisal took place as part of the Local Plan consultations so the method of consultation for each SA stage was identical to that of each Local Plan consultation outlined in this report.

## APPENDIX ONE

### 1. Specific Consultation Bodies for the Local Plan process

Coastal West Sussex Clinical Commissioning Group	Arun District Council
Brighton & Hove City Council	British Gas
British Rail Property Board	British Telecom
Cable and Wireless	Cellnet
Chichester District Council	Coal Authority
Department for Transport	EDF Energy
Historic England	Environment Agency
Highways England	Homes and Communities Agency
Horsham District Council	Marine Management Organisation
Mid Sussex District Council	National Grid
Natural England	Network Rail
Powergen	Scottish Power
South Downs National Park Authority	South East Coast Strategic Health Authority
South East Water	Southern Water
Sport England	Transco
West Sussex County Council	Worthing Borough Council

### 2. Specific Consultation Bodies who responded to Stakeholder Issues and Options 2010

Coastal West Sussex Clinical Commissioning Group	EDF Energy
Historic England	Environment Agency
Highways England	Natural England
Scottish Power	South Downs National Park Authority
Southern Water	West Sussex County Council

### 3. Specific Consultation Bodies who responded to Housing and Employment Options 2011

Coal Authority	Highways England
Natural England	Southern Water
West Sussex County Council	

### 4. Specific Consultation Bodies who responded to Draft Adur Local Plan 2012

Arun District Council	Brighton & Hove City Council
Historic England	Environment Agency
Highways England	Horsham District Council
Mid Sussex District Council	South Downs National Park Authority
Southern Water	West Sussex County Council

**5. Specific Consultation Bodies who responded to Revised Draft Adur Local Plan 2013**

Arun District Council	Brighton & Hove City Council
Environment Agency	Highways England
Mid Sussex District Council	NHS Property Services
Natural England	South Downs National Park Authority
Southern Water	West Sussex County Council

**6. Specific Consultation Bodies who responded to the Proposed Submission Adur Local Plan 2014**

Arun District Council	Brighton & Hove City Council
East Sussex County Council	Environment Agency
Highways England	Marine Management Organisation
Mid Sussex District Council	NHS Property Services
Natural England	South Downs National Park Authority
Southern Water	West Sussex County Council
Worthing Borough Council	

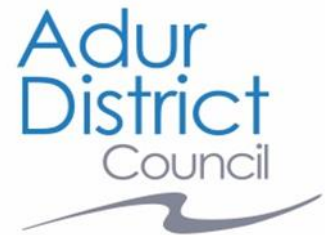
**7. Specific Consultation Bodies who responded to the Proposed Amendments to the New Monks Farm Allocation within the 2014 Proposed Submission Adur Local Plan**

Environment Agency	West Sussex County Council
Natural England	Historic England

**8. Specific Consultation Bodies who responded to the Amendments to the Proposed Submission Adur Local Plan (2016)**

Brighton & Hove City Council	Marine Management Organisation
Environment Agency	Southern Water
Historic England	Sport England
Highways England	West Sussex County Council

## APPENDIX TWO



### PROPOSED SUBMISSION ADUR LOCAL PLAN 2014

#### **Statement of Representation Procedures (Regulation 19) Town and Country Planning (Local Planning) (England) Regulations 2012**

The Proposed Submission Adur Local Plan 2014 is being made available for representations over a six-week statutory period starting on 20th October 2014, until 5pm on 1st December 2014. During this period the Local Plan and Policies Map will be published and made available alongside other supporting documents including a Sustainability Appraisal.

The Proposed Submission Adur Local Plan 2014 sets out a vision for Adur up to 2031. It contains strategic planning policies to deliver new homes, jobs and infrastructure. These policies and principles will shape the future of the area and will be used in the consideration of planning applications. The Council intends to submit the Local Plan to the Secretary of State for Communities and Local Government. The Plan covers that part of Adur District which lies outside the South Downs National Park.

#### **Location of Documents for Inspection**

Copies of the Proposed Submission Adur Local Plan 2014, Policies Map and supporting documentation (including Sustainability Appraisal and Habitats Regulations Assessment) are available at the following locations for inspection:

**Adur Civic Centre**, Ham Road, Shoreham-by-Sea, BN43 6PR (Open 9.00am – 5:00pm Monday-Friday)

**Shoreham Library**, St Mary's Road, Shoreham-by-Sea BN43 5ZA (Open Mondays 10am-7pm, Tues, Wed, Thurs 10am – 6pm, Fri 10am – 5pm, Sat 10am-4pm)

**Lancing Library**, Penstone Park, Lancing BN15 9DL (Open Mon-Fri 10am – 6pm, Sat 10am-4pm)

**Southwick Library**, Southdown Road, Southwick, BN42 4FT (Open Mon-Fri 10am – 5pm, Sat 10am – 2pm)

In addition to providing copies of the said documents in accordance with Regulations 19 and 35, reference copies have been placed at Sompting Parish Council (Harriet Johnson Centre, Old School House, Loose Lane, Lancing BN15 0BG) and Lancing Parish Council (Parish Hall, South Street, Lancing BN15 8AJ).

Response forms are available at all the above locations, or from the Council's website.



**Electronic versions** of the Proposed Submission Adur Local Plan 2014, Policies Map and supporting documentation can be found on the Council's website at [www.adur-worthing.gov.uk/adur-local-plan-2014](http://www.adur-worthing.gov.uk/adur-local-plan-2014) along with response forms and guidance on how to make a representation.

### **Making a Representation**

Representations at this stage should only be made in relation to the legal compliance of the Local Plan and to the soundness of the Local Plan. Representations should specify in what respect(s) the Plan is considered to be unsound, and what change(s) would need to be made to make it sound. These terms are explained in a guidance note available from the locations set out above or from the Councils' website.

Anonymous comments or comments received outside these dates will not be accepted. Please note that comments cannot be treated as confidential. Copies of all comments will be made available for the public to view (including respondent's name) but will not include any personal contact details or signatures.

All representations received within the statutory consultation period will be submitted to the Secretary of State and considered as part of a public examination by an independent Planning Inspector.

Representations should be provided in writing. This can be done by completing and submitting the standard response form using the following methods:

**Email:** [planning.policy@adur-worthing.gov.uk](mailto:planning.policy@adur-worthing.gov.uk)

**Post to:** Planning Policy Team, Adur and Worthing Councils, Town Hall, Chapel Road, Worthing BN11 1BR.

#### **Or may be handed in at:**

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

***Comments must be received by 5pm on 1st December 2014.***

#### **Request to be Notified**

Please indicate in your representation if you would like to be notified of the following:

- Submission of the Local Plan for public examination by an independent Inspector;
- Publication of the Inspector's recommendations; and/or
- The adoption of the Adur Local Plan.

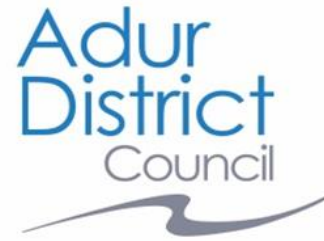
For more information visit:

[www.adur-worthing.gov.uk/adur-local-plan-2014](http://www.adur-worthing.gov.uk/adur-local-plan-2014)

email [planning.policy@adur-worthing.gov.uk](mailto:planning.policy@adur-worthing.gov.uk)

or telephone: 01273-263000 and ask for the Adur Planning Policy Team.

## APPENDIX THREE



### **AMENDMENTS TO THE PROPOSED SUBMISSION ADUR LOCAL PLAN (2016)**

#### **Statement of Representation Procedures (Regulation 19) Town and Country Planning (Local Planning) (England) Regulations 2012**

Amendments to the Proposed Submission Adur Local Plan (2016) are being made available for representations to be made over a six-week statutory period starting 31<sup>st</sup> March 2016, until midnight on 11<sup>th</sup> May 2016. During this period the Amendments to the Local Plan and Policies Map will be published and made available alongside other supporting documents including a Sustainability Appraisal. The Amendments document shows changes to the Proposed Submission Adur Local Plan, previously published in 2014.

Following this publication period, the Council intends to submit the Amendments to the Proposed Submission Adur Local Plan (2016) and Proposed Submission Adur Local Plan 2014 to the Secretary of State for Communities and Local Government. The Plan covers that part of Adur District which lies outside the South Downs National Park.

Representations at this stage should relate only to the Amendments. Please note that if you previously made representations on the Proposed Submission Adur Local Plan 2014 there is no need to resubmit them during this publication period unless you wish to alter or withdraw your representation in the light of the amendments proposed. Representations made on the Proposed Submission Adur Local Plan 2014, as well as those made on the Amendments to the Proposed Submission Adur Local Plan (2016) will be provided to the Inspector appointed to carry out the Examination.

#### **Location of Documents for Inspection**

Copies of the Amendments to the Proposed Submission Adur Local Plan (2016), Policies Map and supporting documentation (including Sustainability Appraisal and Habitats Regulations Assessment) are available at the following locations for inspection:

**Shoreham Centre**, 2 Pond Road, Shoreham-by-Sea BN43 5WU (Open Mondays-Fridays 9am – 5pm)

**Shoreham Library**, St Mary's Road, Shoreham-by-Sea BN43 5ZA (Open Mondays 10am-7pm, Tues, Wed, Thurs 10am – 6pm, Fri 10am – 5pm, Sat 10am-4pm)

**Lancing Library**, Penstone Park, Lancing BN15 9DL (Open Mon-Fri 10am – 6pm, Sat 10am-4pm)

**Southwick Library**, Southdown Road, Southwick, BN42 4FT (Open Mon-Fri 10am – 5pm, Sat 10am – 2pm)

In addition to providing copies of the said documents in accordance with Regulations 19 and 35, reference copies have been placed at Sompting Parish Council (Harriet Johnson Centre, Old School House, Loose Lane, Lancing, BN15 0BG) and Lancing Parish Council (Parish Hall, South Street, Lancing, BN15 8AJ).

Response forms are available at all the above locations, or from the Council's website.

**Electronic versions** of the Amendments to the Proposed Submission Adur Local Plan (2016), Policies Map and supporting documentation can be found on the Council's website at [www.adur-worthing.gov.uk/adur-local-plan-2016](http://www.adur-worthing.gov.uk/adur-local-plan-2016) along with response forms and guidance on how to make a representation.

### **Making a Representation**

Representations at this stage should only be made in relation to the legal compliance of the Amendments to the Local Plan and to the soundness of the Amendments to the Local Plan. Representations should specify in what respect(s) the Amendment is considered to be unsound, and what change(s) would need to be made to make it sound. These terms are explained in a guidance note available from the locations set out above or from the Councils' website.

Anonymous comments or comments received outside these dates will not be accepted. Please note that comments cannot be treated as confidential. Copies of all comments will be made available for the public to view (including respondent's name) but will not include any personal contact details or signatures.

All representations received within the statutory consultation period will be submitted to the Secretary of State (as will those received in response to the publication of the Proposed Submission Adur Local Plan 2014) and considered as part of a public examination by an independent Planning Inspector.

Representations should be provided in writing by completing and submitting the standard response form using the following methods:

**Email address for representations:** [adurplanningpolicy@adur-worthing.gov.uk](mailto:adurplanningpolicy@adur-worthing.gov.uk)

**Post to:** Planning Policy Team, Adur and Worthing Councils, Town Hall, Chapel Road, Worthing BN11 1BR.

**Or may be handed in at:**

- Shoreham Centre, 2 Pond Road, Shoreham-by-Sea BN43 5WU
- Portland House, 44 Richmond Road, Worthing, BN11 1HS

***Representations must be received by midnight 11<sup>th</sup> May 2016***

**Request to be Notified**

Please indicate in your representation if you would like to be notified of the following:

- Submission of the Local Plan for public examination by an independent Inspector;
- Publication of the Inspector's recommendations; and/or
- The adoption of the Adur Local Plan.

For more information visit:

[www.adur-worthing.gov.uk/adur-local-plan-2016](http://www.adur-worthing.gov.uk/adur-local-plan-2016)

Email address for queries: [planning.policy@adur-worthing.gov.uk](mailto:planning.policy@adur-worthing.gov.uk)

or telephone: 01273-263000 and ask for the Adur Planning Policy Team.

**Appendix 4: Submission Adur Local Plan 2016 – Summary of representations by policy and officer level indicative response.**

(Please see <http://www.adur-worthing.gov.uk/alp-submission-2016/> to view representations in full).

Rep ID	Representor	Part/Policy Paragraph	Summary of Representation/ Proposed Change	Response
23	WSCC	Part one Introduction <b>para 1.7</b>	Amend wording re: role of WSCC (alternative wording provided). Also amend footnotes.	Minor Modification proposed
25	Sussex Wildlife Trust	Part one <b>key issues</b>	Pleased to see key issues for the district include broad recognition of importance of natural environment. Encouraged to see that key issues highlight need to maintain and enhance those assets as well as facing challenge of climate change.	Noted.
23	WSCC	Part one Vision and Objectives <b>supporting text para 1.34</b>	Should not remove word 'education', as SH will still need to make contribution to education needs.	Noted; however education provision may not be on this particular site; reinstatement of this word may be misleading. Contributions for education will be sought.
23	WSCC	Part one <b>Vision and Objectives</b>	Support re flood risk.	Noted
25	Sussex Wildlife Trust	Part one <b>Vision and Objectives</b>	Disappointed that plan fails to include a vision relating specifically to biodiversity in district. Should contain clear vision statement setting out District's commitment to delivering a net gain in biodiversity.	Noted. A Major Modification is proposed to add reference to net gains in natural capital. However, this will not form a separate vision. Still part of Vision 7.

Rep ID	Representor	Part/Policy Paragraph	Summary of Representation/ Proposed Change	Response
32	Home Builders Federation	Part one Vision and Objectives <b>V1 and O2</b>	Vision 1 and Objective 2 should be amended; unjustified as the Plan does not meet full OAN. The problem of the shortfall should be stated explicitly in the Plan. If the Plan cannot meet its full OAN, not all communities will benefit from regeneration. Should embark on an immediate review of the Plan, with a commitment to working with neighbouring and other authorities.	Do not agree this change is necessary. The commitment to working with other authorities is made clear in Paras 1.22-1.24 of the Plan and the accompanying Duty to Cooperate Statement. The shortfall is explained in Para 2.22 of the Plan, with more detail in the Housing Topic Paper.
25	Sussex Wildlife Trust	Part one Vision and Objectives <b>O3 &amp; O11</b>	Question whether Objectives 3 and 11 are mutually achievable. Can flood risk be minimised while allocating land at New Monks Farm?	New Monks Farm has passed the Sequential and Exception Test so it is considered that the the two objectives are mutually achievable.
25	Sussex Wildlife Trust	Part one Vision and Objectives <b>O6</b>	Support objective 6 and recognition of need for natural capital.	Noted.
25	Sussex Wildlife Trust	Part one Vision and Objectives <b>O7</b>	Last sentence of objective 7 should be amended to reflect wording of NPPF para 109. Unable to find the term net gains in biodiversity within local plan and encourage ADC to ensure wording reflects sentiment of NPPF.	Noted. A major modification is proposed to the Vision to make reference to net gains; additional change to Objective 7 is not necessary.
26	Turley	<b>Policy 2</b>	Should not refer to Sompting village in spatial strategy	ADC officer view is that the spatial strategy is an accurate reflection of the Plan's strategy, and no amendment is required.

Rep ID	Representor	Part/Policy Paragraph	Summary of Representation/ Proposed Change	Response
34	Cobbetts (Thornton)	<b>Policy 2</b>	The Plan should include a policy whereby all sites previously identified by the Urban Fringe Study 2006, which will benefit from enhanced flood defences as a result of the ATW should be allocated for housing or safeguarded for future needs.	Disagree. Sites have been assessed through SHLAA, SA, landscape work, etc. and allocated as appropriate.
38	NMF Developments Ltd	<b>Policy 2</b>	Sound and consistent with Para 14 of NPPF	Support noted.
25	Sussex Wildlife Trust	<b>Policy 2</b>	Previous comments still stand. What steps have ADC taken to ensure that by delivering 3609 dwellings they will still be able to deliver the 6th objective of the plan to increase the District's Natural Capital?	Policies within plan aim to ensure that new development enhances biodiversity where possible.
25	Sussex Wildlife Trust	<b>Policy 3 supporting text para 2.17</b>	The Plan indicates a reduction of 113 dwellings that will be delivered on brownfield sites. It is not clear why this modification has occurred and should be made clear.	This reflects updated monitoring information on sites identified in the SHLAA. Table 1 indicates the base date of the monitoring period in Dwellings Completed line.
32	Home Builders Federation	<b>Policy 3 supporting text para 2.18 and table 1</b>	The Council states that there have been 528 completions since 2011. This is not supported by DCLG data which indicates lower completions of 340 and is based on data returns from local authorities, NHBC and Approved Inspectors - more reliable. It would be helpful if the Council could explain monitoring data in the Housing Implementation Strategy.	DCLG are aware that house building statistics (Live Table 253) may be undercounting some dwellings and are reviewing methodologies used to produce this data. Adur uses WSCC monitoring data (used by all West Sussex LPAs) based on building control completions data from individual authorities, a review of the housing land supply information for each large site by planning officers together with a site visit to each large site carried out by WSCC. This is considered to be more accurate than using DCLG data.

Rep ID	Representor	Part/Policy Paragraph	Summary of Representation/ Proposed Change	Response
32	Home Builders Federation	Policy 3 supporting text para 2.18 and table 1	The windfall allowance appears too high, even at discounted rate. Given the constrained housing land supply, the assumption that windfalls will continue at the same rate is too confident. The Council should take a more prudent approach and allocate more sites.	Analysis of past completions on small windfall sites has been used to calculate the windfall allowance as explained in the Housing Implementation Strategy (Appendix 3). The Council will continue to monitor the position.
26	Turley	Policy 3	Housing provision too low; suggest increase to minimum no of dwellings proposed to include exploration of increased number at West Sompting	Noted; however no evidence submitted to clarify how this can be achieved within parameters of transport/ landscape matters, etc.
38	NMF Developments Ltd	Policy 3	Sound; capacity based approach appropriate due to environmental constraints	Support noted.
25	Sussex Wildlife Trust	Policy 3	Previous comments still stand. What steps have ADC taken to ensure that by delivering 3609 dwellings they will still be able to deliver the 6th objective of the plan to increase the District's Natural Capital?	Policies within plan aim to ensure that new development enhances biodiversity where possible.
32	Home Builders Federation	Policy 3	The housing requirement of 180dpa is unsound as does not address the full OAN. It has not been demonstrated that 180dpa is all that can be accommodated. Consider that there are alternative options within the HMA to accommodate some of the unmet need of Adur (as considered at the Lewes and Arun Examinations). Consider that there are more options and lists SHLAA sites that should not have been rejected.	Adur has, and is, working with other authorities in the Coastal West Sussex and Greater Brighton area to address cross-boundary issues, including housing shortfalls. Representation has been made to consider SHLAA sites ADC/106/13 and ADC/129/13 as an allocation in the Local Plan. SHLAA site ADC/128/13 is not being promoted for development. SHLAA sites ADC/078/13 and ADC/080/13 are recreation grounds. SHLAA site ADC/086/13 is not a rejected site; it is identified as having potential for development.



Rep ID	Representor	Part/Policy Paragraph	Summary of Representation/ Proposed Change	Response
47	Boyer for Hyde	Policy 3 <b>evidence base: Landscape Studies</b>	Landscape evidence base does not contain methodology; change in assessment of sensitivity between 2012 and 2016 landscape studies; they do not consider sensitivity in relation to change (only inherent sensitivity); do not analyse importance of Local Green Gaps; lack of consistency in approach to site allocations. Therefore, landscape studies are not a reliable evidence base to support site allocations (Policy 3 and Policy 4) or Policy 14 relating to Local Green Gaps.	Proposed development would result in significant reduction in quality and green character of gap landscape and gateways to Lancing and Shoreham; area forms key part of landscape setting for two local landmarks and sense of openness and greenness in views across Lancing gap from railway and A259. The gaps are critically important component of landscape setting of the settlements bordering the gaps, contributing to their individual, distinctive character and identity. The change in the assessment of sensitivity reflects the need to give greater regard to the area's function as a local green gap.
38	NMF Developments Ltd	Policy 4 <b>supporting text para 2.43 -2.44</b>	Supports flexibility regarding employment provision.	Noted.
38	NMF Developments Ltd	Policy 4 <b>supporting text para 2.49</b>	Needs to be made clear that location of roundabout is sufficiently flexible so best solution can be provided taking into account constraints such as SAM and spring.	Noted. Agreed that there needs to be some flexibility to account for Honeymans Hole and SAM; however no change necessary to wording of Plan.
38	NMF Developments Ltd	<b>Policy 4</b>	Setting maximum limit on employment generating floorspace is too restrictive; 10,000sq m should be referred to as a minimum. Any additional space should be should be treated positively if it complies with other ALP policies and NPPF.	Given the sensitivity of the land due to its location within local green gap, policy cannot be too flexible. More than 10,000sqm likely to have negative impact on gap and landscape.

Rep ID	Representor	Part/Policy Paragraph	Summary of Representation/ Proposed Change	Response
47	Boyer for Hyde	Policy 4 <b>evidence base: Landscape Studies</b>	Landscape evidence base does not contain methodology; change in assessment of sensitivity between 2012 and 2016 landscape studies; they do not consider sensitivity in relation to change (only inherent sensitivity); do not analyse importance of Local Green Gaps; lack of consistency in approach to site allocations. Therefore, landscape studies are not a reliable evidence base to support site allocations (Policy 3 and Policy 4) or Policy 14 relating to Local Green Gaps.	Proposed development would result in significant reduction in quality and green character of gap landscape and gateways to Lancing and Shoreham; area forms key part of landscape setting for two local landmarks and sense of openness and greenness in views across Lancing gap from railway and A259. The gaps are critically important component of landscape setting of the settlements bordering the gaps, contributing to their individual, distinctive character and identity. The change in the assessment of sensitivity reflects the need to give greater regard to the area's function as a local green gap.
7	Wendy Dowse	Policy 5 <b>supporting text para 2.46</b>	Development east of Grinstead Lane will leave River Adur as only gap between Lancing and Shoreham; increase in development at Airport will threaten its survival; stop more expansion of Airport.	Comments noted; Plan seeks to achieve balance between meeting development needs and avoiding coalescence.
48	Albermarle and Longbow	Policy 5 <b>supporting text para 2.46</b>	Support amendment but seek specific reference to centrally located roundabout	Change not considered necessary
7	Wendy Dowse	Policy 5 <b>supporting text para 2.47</b>	Area has medium-low landscape sensitivity but has important function as flood plain.	Noted, although New Monks Farm does not fall within Flood Zone 3b (functional floodplain).
7	Wendy Dowse	Policy 5 <b>supporting text para 2.48</b>	Not clear who will manage riparian network	This will need to be addressed through planning agreement; landowners have indicated that they are likely to form a management company to manage that part of the network that runs through site.

Rep ID	Representor	Part/Policy Paragraph	Summary of Representation/ Proposed Change	Response
48	Albermarle and Longbow	Policy 5 <b>supporting text para 2.49</b>	Suggest amendment to refer to centrally positioned roundabout - wording provided	Change not considered necessary
49	Alan Robb	Policy 5 <b>supporting text para 2.51</b>	Withdrawal of Para 2.51 as concern that traffic accessing development through Mash Barn Estate	Concerns are noted. However WSCC, as highway authority, are satisfied that this can be achieved.
49	Alan Robb	Policy 5 <b>supporting text para 2.51</b>	Withdraw reference to first 250 dwellings at NMG accessing through Mash Barn Estate	Concerns are noted. However WSCC, as highway authority, are satisfied that this can be achieved.
48	Albermarle and Longbow	Policy 5 <b>supporting text para 2.52</b>	Delete word 'help' from 2.52	Change not necessary - current wording considered accurate.
7	Wendy Dowse	Policy 5 <b>supporting text para 2.53</b>	In conflict with NPPF and conclusions of SWMP	Given that New Monks Farm has passed the Sequential and Exception Test it is not considered to be in conflict with the NPPF. The conclusions of the SWMP make no specific mention of development at New Monks Farm although it does state that in times of particularly heavy rainfall the Lancing area is likely to flood.
38	NMF Developments Ltd	Policy 5 <b>supporting text para 2.53</b>	Lancing SWMP not finalised; date should be removed.	No change.

Rep ID	Representor	Part/Policy Paragraph	Summary of Representation/ Proposed Change	Response
7	Wendy Dowse	Policy 5 <b>supporting text para 2.54A</b>	Issue of sewerage; queries approach due to network capacity	The issue of foul water and network capacity is currently being explored by the developer, Southern Water and the Environment Agency.
6	Environment Agency	Policy 5 <b>supporting text para 2.54A</b>	Requesting specific rewording regarding wastewater; also reword last line.	Agreed. A Minor Modification is proposed.
38	NMF Developments Ltd	Policy 5 <b>supporting text para 2.54A</b>	Should provide more flexibility to give equal preference to connection to public sewer or sewerage treatment plant.	Contradicts Environment Agency representation; no change in response to this representation.
48	Albermarle and Longbow	Policy 5 <b>supporting text para 2.58</b>	More clarity on location and provision of roundabout sought, also Withy Patch. Alternative wording provided.	Change not necessary - current wording considered accurate.
23	WSCC	<b>Policy 5</b>	Want wording added to say financial contribution towards education facilities.	Noted; however land for primary school will be provided as part of development, as required by policy.
46	Historic England	<b>Policy 5</b>	Concerns re impact of New Monks Farm development on WWII Trainer Dome Scheduled Monument.	A heritage assessment of Shoreham Airport has been undertaken which demonstrates that the proposed development at New Monks Farm and Shoreham Airport (including the roundabout) would have no substantial harm on historic assets at the airport. Further work will be carried out by the site promoter to address this issue.

Rep ID	Representor	Part/Policy Paragraph	Summary of Representation/ Proposed Change	Response
38	NMF Developments Ltd	<b>Policy 5</b>	Not sufficiently flexible; 'appropriate employment provision' should be given a broad definition; need to ensure that the development can accommodate 'modern operators requirements' and recognise opportunities associated with a range of uses; maximum limit is too restrictive.	Given the sensitivity of the land due to its location within local green gap, no change is proposed in response to this representation.
38	NMF Developments Ltd	<b>Policy 5</b>	With reference to affordable housing, flexibility should be provided to ensure viability with regards to the level of infrastructure required. Flexibility should also be provided in terms of recognising the need to provide starter homes as stated in the Housing and Planning Act.	The OAN study addressed tenure splits; these will be tested through Whole Plan Viability work. It is not considered appropriate to modify the policy until the Regulations are in force. If this is the case prior to Examination, a further modification to the Plan will be proposed.
38	NMF Developments Ltd	<b>Policy 5</b>	Disagree with amendment re: CIL/ s106; return to original wording. Suggested wording provided.	Proposed modifications are made to rationalise references to infrastructure provision, but are not made in response to this representation.
25	Sussex Wildlife Trust	<b>Policy 5</b>	Concerned that modifications made to policy are to detriment of site's biodiversity. The December 2015 consultation did not make clear that increasing the housing to upper range of 600 would result in removal of wording to justify its viability in relation to biodiversity. By removing this wording, the policy now fails to deliver emphasis of NPPF para 114. Strongly recommend that wording is reinstated given the value of the site in delivering a healthy functioning ecosystem for the District.	Removal of text does not mean that development can have adverse impact on biodiversity and landscape. Biodiversity policy in plan and NPPF will still apply to any development at New Monks Farm.

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25	Sussex Wildlife Trust	<b>Policy 5</b>	Support additions made to the policy in respect of the following statement: A site wide landscape and ecological management plan to be produced and implemented <u>to the satisfaction of the local planning authority</u> to ensure the long-term maintenance of retained and newly created on site habitats. However, would like to see addition of wording that states that any ecological plans need to be based on up to date evidence. This wording would ensure it is line with para 165 of NPPF.	It seems unnecessary to state that ecological plans need to be based on up to date evidence. NPPF already specifies this and it is a given that any plans would be required to be based on up to date evidence. It is not necessary to repeat NPPF.
7	Wendy Dowse	<b>Policy 5</b>	Carry out flood risk assesment at NMF before any developer is allowed to apply for planning permission. SUDS do not work on flood plains	Noted. Any planning application would have to be accompanied by a detailed Flood Risk Assessment. There are many different types of SuDs and these are being explored by developer and consultants.
9	Lancing College	<b>Policy 5</b>	No objections to amendments re NMF; detailed design and business continuity, position is reserved, will address as part of planning process. Important that LGF bids are supported and HE delivers upgraded A27 Sussex Pad - west of Chichester) prior to general election.	Noted
30	Ricardo	<b>Policy 5</b>	No objections to amendments re NMF; detailed design and business continuity, position is reserved, will address as part of planning process. Important that LGF bids are supported and HE delivers upgraded A27 Sussex Pad - west of Chichester) prior to general election.	Noted
1	Sport England	<b>Policy 5</b>	Support amendments	Noted

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11	Bill Freeman/ Adur Floodwatch	<b>Policy 5</b>	Not compliant with NPPF para 155; not proactively engaged	Disagree. Residents have been consulted and a number of meetings have taken place with residents regarding flood risk at New Monks Farm. Have raised concerns of residents with WSCC and EA. However, no objections have been received regarding allocation of NMF from EA or WSCC and Sequential and Exception Test has been passed.
11	Bill Freeman/ Adur Floodwatch	<b>Policy 5</b>	Refers to application ref AWDM/1128/14 and SHLAA ref ADC/083/13 petrol station site; claims inconsistency in approach (allocating NMF while this site refused) and inconsistency in dwelling numbers between two documents referred to.	Comments noted; however appeal decision has now allowed development (AWDM/1128/14).
21	CPRE	<b>Policy 5</b>	There is currently lack of detail in the Exception Test in regards to maximum on-site water levels and flood depths/ velocities for the design tidal flood event - (including defence failure) in order to assess the viability of the mitigation measures.	Noted. This info has been requested from the EA.
21	CPRE	<b>Policy 5</b>	Given difference in potential extreme tidal levels and site levels, there may be limited scope to raise floor levels and significant land raising will be required. Land raising across a large extent of the site would likely lead to displacement of flood storage and increase flood risk elsewhere.	These issues are currently being assessed. It is the developer's intention to provide a secondary defence bund which may reduce the need for land raising. However, approach yet to be agreed with the EA.
21	CPRE	<b>Policy 5</b>	WaterCo report recommends that further work is carried out to assess and determine the impacts of the proposed development on flood risk elsewhere before allocating this site. Rep sets out this further work.	EA have seen this report and while it recognises that further work is required to determine the impacts of proposed development on flood risk elsewhere, EA are comfortable with this further work being undertaken at detailed design stage rather than at allocation stage.

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21	CPRE	<b>Policy 5</b>	The WaterCo report (submitted with CPRE rep) concludes that 'The assessments, as presently offered, appear to be incomplete and inadequate and do not provide a sufficiently robust basis for supporting the site allocation within the Adur Local Plan.' CPRE would like to see further work carried out before the allocation of this site to assess and determine the impacts of the proposed development on flood risk elsewhere. A study into the impacts and viability of the required mitigation measures (raising the development platform) should be undertaken.	The Environment Agency (EA) have seen this report and while it recognises that further work is required to determine that development will not worsen flood risk elsewhere, the EA is comfortable with this further work being undertaken at detailed design stage rather than at allocation stage.
21	CPRE	<b>Policy 5</b>	Assessment of the capacity of local sewerage infrastructure to accommodate a major development should also be made prior to allocation in the Local Plan.	This assessment is currently being undertaken.
23	WSCC	<b>Policy 5</b>	Need to ensure any flood risk due to landfill/ landraising that reduces flood plain, can be mitigated. Refers to CIRIA Suds manual (C753)	Agreed. To be explored through detailed FRA.
42	Highways England	<b>Policy 5</b>	Understand desire for centrally located roundabout, but this requires careful consideration of speed limits in conjunction with built environment; developer will need to provide a non-motorised user link across A27 to SDNP. An at grade crossing is unsuitable in an area with speed limits over 40mph; need to demonstrate traffic delays are minimised and safety maintained.	Noted



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25	Sussex Wildlife Trust	<b>Policy 5</b>	Given the biodiversity and flood risk issues in this area, concerned about allocation. Represents further erosion of green gap and development unlikely to contribute to gain in natural capital.	Every effort has been made to balance the need for new development with the need to retain a functioning green gap. In line with Policy 32: Biodiversity the development will need to protect and, where possible, enhance biodiversity.
48	Albermarle and Longbow	<b>Policy 5 paragraph 1</b>	Support	Support noted.
48	Albermarle and Longbow	<b>Policy 5 para 1 bullet point 5</b>	Make reference to 'suitable access' more specific in policy, as it has been in supporting text, and clarify that it needs to be delivered prior to delivery of the first 250 dwellings.	No change - this cannot be delivered.
48	Albermarle and Longbow	<b>Policy 5 para 2</b>	Support, however suggest amendment to wording for clarification.	Main Modification proposed
48	Albermarle and Longbow	<b>Policy 5 para 9 bullet point 1</b>	Would benefit from inclusion of reference to centrally located roundabout.	No change
38	NMF Developments Ltd	<b>Policy 5 Proposals Map and Map2</b>	Indicative Built Up Area Boundary is supported, but needs to extend further eastwards north-east and south-east of allocation to ensure adequate land is provided.	No change. Boundary in Local Plan has been informed by landscape evidence.
11	Bill Freeman/ Adur Floodwatch	<b>Policy 5 Evidence base Flood risk / drainage</b>	Council were seeking further info regarding surface water disposal and mitigation 2014; not received.	A detailed FRA for the site is currently being produced. However, the Council considers that it currently has adequate information to allocate NMF in Local Plan.

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11	Bill Freeman/ Adur Floodwatch	Policy 5 Evidence base <b>Flood risk / drainage</b>	Viability cannot be calculated until a drainage scheme is developed; has drainage and sewerage been part of calculation?	Whole Plan Viability work takes account of abnormal costs.
11	Bill Freeman/ Adur Floodwatch	Policy 5 Evidence base <b>S&amp;E Test</b>	Sequential and Exception Test does not include enough information to determine whether the development at New Monks Farm would worsen flood risk elsewhere.	Part 2 of the Exception Test recommends a number of measures to ensure flood risk is not worsened elsewhere. Such measures are made clear in the table. More detail will be forthcoming as the detailed design of development progresses.
11	Bill Freeman/ Adur Floodwatch	Policy 5 Evidence base <b>SWMP p36-39</b>	SWMP (believe may mean Part 2 of Exceptions Test) fails to demonstrate there will be no flood risk elsewhere as a result of development at New Monks Farm; doesn't take account of off-site influences.	Part 2 of the Exception Test recommends a number of measures to ensure flood risk is not worsened elsewhere. Such measures are made clear in the table.
26	Turley	Policy 6 <b>supporting text para 2.69</b>	Dankton Lane is not referred to in policy, so delete from text	Main modification is proposed to policy to refer to this junction.
26	Turley	Policy 6 <b>supporting text para 2.72</b>	Delete reference to Sompting Neighbourhood Plan being able to influence design and layout of open spaces.	These matters are given as examples. It is not considered necessary to remove these from plan.
23	WSCC	<b>Policy 6</b>	Include wording to retain/ enhance crossings across A27 - alternative wording proposed	Proposed development will not impact on existing crossing. Contributions for sustainable transport infrastructure are being made.
6	Environment Agency	<b>Policy 6</b>	Withdrawal of previous representations re: Policy 6	Noted

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42	Highways England	<b>Policy 6</b>	Agree mitigations are required at Lyons Farm junction and Grinstead Lane roundabout. Agree Transport Assessment will be needed including junction with Dankton Lane.	Noted
18	Sompting PC	<b>Policy 6</b>	Pitches not shown on Policies Map; not demonstrated that West Sompting is best place for pitches to meet district needs. Adequate provision for Sompting exists at Sompting rec, and 3Gpitch a Robert Woodard Academy. Not demonstrated that impacts of pitches (traffic, noise, light pollution) have been addressed. Not demonstrated that impact on gap has been assessed.	3 youth pitches required in Adur to meet needs up to 2031. Unlikely to be capacity to provide at Shoreham Harbour and there is already a 3G pitch for public use adjacent New Monks Farm. West Sompting is therefore best allocation to help meet pitch needs.
25	Sussex Wildlife Trust	<b>Policy 6</b>	Strategic allocation further erodes green gaps between Worthing and Sompting.	Noted. However, every effort has been made to balance the need for new development with the need to retain a functioning local green gap.
25	Sussex Wildlife Trust	<b>Policy 6</b>	Welcome inclusion of biodiversity enhancements being suggested for site and potential for local people to use green gap with sustainable transport links. These proposed transport links should incorporate green infrastructure to ensure they align with sensitivities of landscape and enhance ecology of area.	Noted.
25	Sussex Wildlife Trust	<b>Policy 6</b>	Section 2.61 and supporting policies map indicate expansion of Cokeham Brooks SNCI. Greater commitment to this should be demonstrated by inclusion of wording to this effect in Policy 6.	Policy indicates that a nature conservation area will be delivered north of SNCI. Cannot commit to extension of SNCI in policy because Council will not make decision on whether land will become SNCI.

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25	Sussex Wildlife Trust	<b>Policy 6</b>	Note that this policy and other policies within the plan fail to address importance of up-to-date ecological information when formulating landscape and ecological management plans.	It seems unnecessary to state that ecological plans need to be based on up to date evidence. NPPF already specifies this and it is a given that any plans would be required to be based on up to date evidence. It is not necessary to repeat NPPF.
1	Sport England	<b>Policy 6</b>	Support amendments	Noted
26	Turley	<b>Policy 6</b> para 1	Plan should not specify which junctions they should contribute to, prior to Transport Assessment being undertaken. Propose wording to address this.	References to junctions have been retained.
26	Turley	<b>Policy 6</b> para 1 8th bullet	8th bullet - add wording to refer to CIL regulations.	Major Modifications have been proposed to reorganise references to infrastructure provision, but this amendment is not considered necessary.
26	Turley	<b>Policy 6</b> para 6 and para 8	6th and 8th paras; suggest minor wording regarding use of s106/CIL - 'where necessary'	Major Modifications have been proposed to reorganise references to infrastructure provision, but this amendment is not considered necessary.
38	NMF Developments Ltd	Policy 7 <b>supporting text para 2.77</b>	Needs to be made clear that location of roundabout is sufficiently flexible so best solution can be provided taking into account constraints such as SAM and spring.	Noted. Agreed that there needs to be some flexibility to account for Honeymans Hole and SAM; however no change necessary to wording of Plan.
48	Albermarle and Longbow	Policy 7 <b>supporting text para 2.77</b>	Minor grammatical change proposed	Change not necessary
43	British Horse Society	Policy 7 <b>supporting text para 2.77</b>	Support only if Sussex Pad is retained as at present	Policy requires that access across the A27 for pedestrians, cyclists and equestrians must be retained, and where possible, enhanced.

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25	Sussex Wildlife Trust	<b>Policy 7</b>	Support para 2.84 recognising the importance of Shoreham Airport as a site which supports wintering and wading birds such as lapwing and skylark.	Support noted.
25	Sussex Wildlife Trust	<b>Policy 7</b>	Still concerned about suitability of this site for development given its important role as flood zone 3b and need for ecological mitigation if area is developed.	Noted. However, site cannot be developed until the Adur Tidal Walls are in place which will change the flood zone from 3b to 3a. No objections have been received from Natural England or RSPB. Policy 7: Shoreham Airport states that ecological enhancements should be incorporated as an integral part of the development.
7	Wendy Dowse	<b>Policy 7</b>	Development east of Grinstead Lane will leave River Adur as only gap between Lancing and Shoreham; increase in development at Airport will threaten its survival; stop more expansion of Airport.	Comments noted; Plan seeks to achieve balance between meeting development needs and avoiding coalescence.
37	Elizabeth Robinson	<b>Policy 7 and map 4</b>	amendments do not meet previous objection (see ref 37); do not develop at airport	Noted.
48	Albermarle and Longbow	<b>Policy 7</b> para 1	Support insertion of 'hangar uses'	Noted
48	Albermarle and Longbow	<b>Policy 7</b> para 6	Add 'where possible' to reflect NPPF	Major Modification proposed.
48	Albermarle and Longbow	<b>Policy 7</b> para 9	Airside and non-airside uses should be treated in same way - allow non-air uses on airside. Wording suggested.	This is likely to have an impact on the long-term viability of the airport. It is considered that the policy provides enough flexibility.
48	Albermarle and Longbow	<b>Policy 7</b> para 10	Add reference to viability	Not considered necessary.
23	WSCC	<b>Policy 8 supporting text 2.101</b>	Remove date	Minor Modification proposed.

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23	WSCC	Policy 8 supporting text para 2.100	Remove last sentence from 2.100	Already proposed.
6	Environment Agency	Policy 8	Withdrawal of previous representations re: Policy 8	Noted
34	Cobbetts (ECE) (Thorntons)	Policy 8	Land required to achieve relocation from Shoreham Harbour.	Noted. JAAP will address.
34	Cobbetts (ECE) (Thorntons)	Policy 8	The constraints to delivery of housing at Shoreham Harbour make it difficult to gauge how it can be delivered in the short-medium term. The current housing trajectory shows delivery coming forward after the first five years with delivery at 179dpa over the next five year period.	A revised trajectory (to be submitted in December 2016) will indicate specific delivery periods for individual sites rather than for the broad location as a whole.
17	Landstone (ECE)	Policy 8	Over-reliance on Shoreham Harbour to provide housing. Will not come forward in medium term. Delivery concerns re flood defences. Significant shortfall in transport investment and lack of new primary school. Remediation of contaminated land.	Shoreham Harbour will make a valuable contribution to meeting needs; JAAP will address many matters of detail.
17	Landstone (ECE)	Policy 8	para 3.12 of rep states that land is required to achieve business relocation from Shoreham Harbour, and there is no robust/ clear land assembly strategy setting this out.	These matters will be addressed through the Shoreham Harbour Joint Area Action Plan.

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17	Landstone (ECE)	<b>Policy 8</b>	The constraints to delivery of housing at Shoreham Harbour make it difficult to gauge how it can be delivered in the short-medium term. The current housing trajectory shows delivery coming forward after the first five years with delivery at 179dpa over the next five year period.	A revised trajectory (to be submitted in December 2016) will indicate specific delivery periods for individual sites rather than for the broad location as a whole.
25	Sussex Wildlife Trust	<b>Policy 8</b>	A suite of ecological assessments should be considered within the policy wording. Welcome policy's recognition that 'All development will be required to protect and enhance the area's important environmental assets and wildlife habitats...' However, along with seeking on site biodiversity gains in line with section 109 of the NPPF, the policy must consider off-site biodiversity gains.	Shoreham Harbour is a broad location in the Local Plan. Offsite biodiversity gains are being addressed through Shoreham Harbour Joint Area Action Plan.
25	Sussex Wildlife Trust	<b>Policy 8</b>	Pleased to see addition of wording in character area 5 that recognises and supports the opportunity 'To enhance biodiversity by creating and improving habitats and green infrastructure links, including landscape enhancements to social housing estates.' Encouraged by additions to character areas which support improvements to green infrastructure.	Noted

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25	Sussex Wildlife Trust	<b>Policy 8</b>	Still concerned that there is not recognition of the potential increase in visitor pressure on sites such as Widewater Lagoon LNR and Shoreham Beach LNR. Policy should highlight importance of securing 106/CIL payments for long term management and monitoring of these sites, particularly given presence of highly sensitive vegetated shingle habitat.	Shoreham Harbour is a broad location in the Local Plan. Offsite biodiversity gains can be addressed through Shoreham Harbour Joint Area Action Plan.
32	Home Builders Federation	<b>Policy 8</b>	Policy 8 states that 1100 homes will be delivered at Shoreham Harbour, but Table 1 on page 23 (supporting text to policy 3) says 968 homes. This means that 132 homes would be delivered after the 2031 and it would be helpful to clarify what time period will JAAP cover?	Both the JAAP and the Local Plan cover the time period 2011-2031 (although the Council is proposing a modification to roll forward the Local Plan period to 2032). Policy 3 indicates the sources and numbers of dwellings to be provided over the whole plan period, with Shoreham Harbour providing 1100 new dwellings. Table 1 demonstrated the current housing land supply position using up to date monitoring information. In this table, the Shoreham Harbour Broad Location figure is reduced to 968 because planning consent has been granted for 132 dwellings and is counted in the "existing commitments" column and will be delivered during the Plan period. This avoids double counting.
23	WSCC	<b>Policy 8</b> para 6	Request that wording revised to say 'suitable education provision will also be provided.'	Current wording states ' Suitable education provision will be made.' This is considered to be similar to requested wording, and sufficiently flexible.
23	WSCC	<b>Policy 8</b> para 10	Add words 'and must not prejudice' to the last sentence of paragraph 10 of the policy.	Do not consider this necessary.



Rep ID	Representor	Part/Policy Paragraph	Summary of Representation/ Proposed Change	Response
25	Sussex Wildlife Trust	<b>Policy 9</b>	Overarching concern that policy fails to encapsulate importance of council's commitment to add to District's natural capital.	It is not considered that every policy in Part 3 needs to refer natural capital. Policy 32 and NPPF will be used to assess any development proposals.
25	Sussex Wildlife Trust	<b>Policy 10</b>	Overarching concern that policy fails to encapsulate importance of Council's commitment to add to District's natural capital.	It is not considered that every policy in Part 3 needs to refer to natural capital. Policy 32 and NPPF will be used to assess any development proposals.
23	WSCC	Policy 11 <b>supporting text para 3.29</b>	Supports wording	Noted
25	Sussex Wildlife Trust	<b>Policy 11</b>	Overarching concern that policy fails to encapsulate importance of council's commitment to add to District's natural capital.	It is not considered that every policy in Part 3 needs to refer to natural capital. Policy 32 and NPPF will be used to assess any development proposals.
25	Sussex Wildlife Trust	<b>Policy 12</b>	Overarching concern that policy fails to encapsulate importance of council's commitment to add to District's natural capital.	It is not considered that every policy in Part 3 needs to refer to natural capital. Policy 32 and NPPF will be used to assess any development proposals.
41	Marine Management Agency	Policy 13 <b>supporting text para 3.56A</b>	Suggest additional wording re MMO	A further amendment has been made as requested, to demonstrate role of marine plans in decision-making.
25	Sussex Wildlife Trust	<b>Policy 13</b>	Overarching concern that policy fails to encapsulate importance of council's commitment to add to District's natural capital.	It is not considered that every policy in Part 3 needs to refer natural capital. Policy 32 and NPPF will be used to assess any development proposals.

Rep ID	Representor	Part/Policy Paragraph	Summary of Representation/ Proposed Change	Response
32	Home Builders Federation	<b>Policy 14</b>	Local Green gaps inhibiting land coming forward for development; should redraw gaps. Plan should distinguish between hierarchies of designations. More weight placed on gaps than meeting OAN.	The Local Plan seeks to achieve a balance between meeting needs, and retaining the separate character and identities of Adur's settlements.
34	Cobbetts (Thornton)	<b>Policy 14</b>	Landscape and visual impact issues concerning the Local Green Gaps have been overstated. Much of land is poor quality and argument for retaining parts of its fringe are unjustified taking into account constrained district, housing shortfall, shortage of deliverable land supply for 5 years and superior and heavily protected landscape of SDNP.	Gaps are not designated on basis of landscape quality. The Local Plan seeks to achieve a balance between meeting needs, and retaining the separate character and identities of Adur's settlements.
25	Sussex Wildlife Trust	<b>Policy 14</b>	Pleased that proposed plan contains this policy which recognises the importance of Adur's local green gaps, but concerned it is undermined by policies 5 and 6.	It is considered that development at West Sompting and New Monks Farm can take place without compromising the function of the gap.
47	Boyer for Hyde	<b>Policy 14 evidence base: Landscape Studies</b>	Landscape evidence base does not contain methodology; change in assessment of sensitivity between 2012 and 2016 landscape studies; they do not consider sensitivity in relation to change (only inherent sensitivity); do not analyse importance of Local Green Gaps; lack of consistency in approach to site allocations. Therefore, landscape studies are not a reliable evidence base to support site allocations (Policy 3 and Policy 4) or Policy 14 relating to Local Green Gaps.	Proposed development would result in significant reduction in quality and green character of gap landscape and gateways to Lancing and Shoreham; area forms key part of landscape setting for two local landmarks and sense of openness and greenness in views across Lancing gap from railway and A259. The gaps are critically important component of landscape setting of the settlements bordering the gaps, contributing to their individual, distinctive character and identity. The change in the assessment of sensitivity reflects the need to give greater regard to the area's function as a local green gap.

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32	Home Builders Federation	Policy 15 <b>supporting text para 4.7</b>	Use Building for Life 12, rather than other design standards.	Comments noted. However, other design guides are also of value. Minor Modification proposed to text to reflect fact that applicants are encouraged, rather than required, to use Building For Life.
25	Sussex Wildlife Trust	<b>Policy 15</b>	Support inclusion of natural features and biodiversity within policy but should clarify that 'positive contribution to biodiversity' means net gain as per s109 of NPPF.	Consider current wording is appropriate.
25	Sussex Wildlife Trust	<b>Policy 18</b>	Disappointed to see removal of policy.	Noted - however this is due to changes at a national level and winding down of Code for Sustainable Homes.
6	Environment Agency	<b>Policy 19</b>	Withdrawal of previous representations re: Policy 19	Noted.
32	Home Builders Federation	<b>Policy 20</b>	Parts of policy contrary to national policy; not a planning matter. Applicants just need to demonstrate compliance with Part L of Building Regs.	While the Code for Sustainable Homes has been wound down and the Government have stated their intention to repeal part c of the Planning and Energy Act 2008, there is currently no intention to repeal parts a or b which allows local planning authorities to impose reasonable requirements for a proportion of energy to be used in development to be from renewable sources or low carbon.

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32	Home Builders Federation	<b>Policy 21</b>	This policy is unsound. The use of Optional Technical Standard for Accessible and Adaptable Dwellings is unjustified and jeopardises the deliverability of the Local Plan. It will have a particular impact on Shoreham Harbour given the viability issues. The caveat 'where feasible and viable' is inappropriate as it should be for the Council to demonstrate viability, not the applicant. NPPG invites LPAS to take other factors such as flooding/ topography into account.	Viability of using the optional higher standards is being tested at the 'strategic' Local Plan level, through the Whole Plan Viability assessment. It is for developers to respond with regards to the viability of individual developments.
32	Home Builders Federation	<b>Policy 21</b>	This policy is unsound because it is contrary to national policy in terms of its reference to Development Control Standard 'Flat Conversions'. Should not use local policy control.	Government standards for new build dwellings do not address flat conversions, hence the retention of this Standard.
26	Turley	<b>Policy 21</b>	The current policy wording which seeks to plan for a mix of houses to meet needs is too prescriptive and inflexible. More flexibility is sought so that individual developments can respond to the site circumstances and the local market. Suggests wording change.	The OAN study 2016 provides up-to-date evidence on housing mix. A major modification is proposed to update the Plan in this respect. The Plan makes it clear in para 4.29 that the suggested mix is the starting point in considering the market housing provision on the strategic sites.
38	NMF Developments Ltd	<b>Policy 21 and supporting text para 4.29</b>	The housing mix in para 4.29 and Policy 5 are not effective when taken together and do not provide sufficient flexibility in allowing for developments to provide a mix which relates to local needs. Housing mix should be considered on site specific basis; Shoreham Harbour will provide mainly smaller units, other sites can provide larger units. Suggested mix and wording provided.	The OAN study 2016 provides up-to-date evidence on housing mix. A major modification is proposed to update the Plan in this respect. The Plan makes it clear in para 4.29 that the suggested mix is the starting point in considering the market housing provision on the strategic sites.

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23	WSCC	Policy 21 <b>supporting text para 4.29</b>	Propose that 'Shoreham Harbour' is added to second bullet point of policy, in order to reflect likely form of development.	Not considered necessary; this level of detail can be addressed through emerging Shoreham Harbour Joint Area Action Plan.
32	Home Builders Federation	<b>Policy 22</b>	Unclear what proportion of LEP funding will be used to improve viability at SH. Shouldn't apply AH policy to SH as it appears unviable. Need clarity as to what level of AH is expected at SH. Use of open book viability assessments does not get round this as planned system should be clear up front. Tenure split in 2014 Viability assessment does not reflect what is in current plan.	LEP funding is being used to upgrade the flood defences at the Sussex Yacht Club site. Current Whole Plan Viability work will consider affordable housing. Exact requirements for Shoreham Harbour will be addressed through the Shoreham Harbour Joint Area Action Plan.
32	Home Builders Federation	<b>Policy 22</b>	Use of gross dwellings to calculate affordable housing contributions is unlikely to be effective as a policy.	This approach is used by Adur and Worthing Councils and has been supported at appeal.
32	Home Builders Federation	<b>Policy 22</b>	CIL: Viability Study has only assessed for strategic sites; Council has not yet determined CIL rates.	Updated viability work looking at various tenure mixes for affordable housing. CIL is likely to be progressed in the future (see LDS).
26	Turley	<b>Policy 22</b>	The Starter Homes Technical Consultation (published March 2016) contains draft Starter Homes Regulations. As Starter Homes will be recognised as a form of affordable housing, a specific reference should be made in the policy.	It is not considered appropriate to modify the policy until the Regulations are in force. If this is the case prior to Examination, a further modification to the Plan will be proposed.

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38	NMF Developments Ltd	<b>Policy 22 and supporting text para 4.40B</b>	The affordable housing tenure mix is unsound; the policy needs to be viability tested. Suggest that the tenure split should be set at 50/50. The Policy needs to be reconsidered in light of H&P Act.	The suggested tenure mix of 50:50 is being tested in the Viability Study. It is not considered appropriate to modify the policy in relation to starter homes until the Regulations are in force. If this is the case prior to Examination, a further modification to the Plan will be proposed.
38	NMF Developments Ltd	<b>Policy 22 and supporting text para 4.40C</b>	The paragraph and policy are not currently effective and are unsound. Affordable Housing providers do not consider 4 bed dwellings as viable, either as they are unaffordable within universal credit limit for rent, or too expensive for shared ownership. Suggest amending the paragraph to confirm that the final mix is subject to negotiation which will provide flexibility.	A major modification is proposed to para 4.40C reflecting updated evidence on affordable housing mix. It recognises that provision should be focused towards smaller dwellings and reduces the amount of 4 bedroom dwellings to be provided.
6	Environment Agency	<b>Policy 24</b>	Withdrawal of previous representations re: Policy 24	Noted.
25	Sussex Wildlife Trust	<b>Policy 30</b>	Policy could ask that all development contributes not only to the green infrastructure needs of the development itself but to green infrastructure needs of the district as a whole, on proportional scale to development.	S106 and (if implemented) CIL contributions will be sought in line with regulations and spent on appropriate schemes which may include GI.
25	Sussex Wildlife Trust	<b>Policy 31</b>	Pleased to see that Adur have taken the Trust's previous advice on board and requires developers to show how their proposed development delivers green infrastructure both on a site level and how it links and enhances the wider district's GI network	Noted

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25	Sussex Wildlife Trust	<b>Policy 31</b>	Trust very disappointed to see council have removed commitment to delivering GI SPD within policy wording. Seek clarity from ADC as to commitment to green infrastructure SPD.	The Council will be producing a GI SPD (See Adur LDS). However, this requirement does not need to be in the policy as it is referred to in para 4.95
25	Sussex Wildlife Trust	<b>Policy 32</b>	Would like to see addition of wording that states that any ecological plans need to be based on up to date evidence. This wording would ensure it is line with para 165 of NPPF.	It seems unnecessary to state that ecological plans need to be based on up to date evidence. The NPPF already specifies this and it is a given that any plans would be required to be based on up to date evidence. It is not necessary to repeat the NPPF.
25	Sussex Wildlife Trust	<b>Policy 32</b>	Policy has the opportunity to reflect the NPPF further through highlighting the importance of landscape in the context of connectivity and its ecological functioning.	Policy does not need to repeat the NPPF. This issue will be reflected in the GI strategy.
32	Home Builders Federation	<b>Policy 33</b>	Due to unmet OAN open space requirements are unjustified; could reintroduce when shortfall accounted for.	Disagree; open space is an important part of development.
36	Southern Water	<b>Policy 33</b>	Concerned amendment is inflexible - reword to say <i>significant</i> loss.	Each case will be treated on its own merits.
1	Sport England	<b>Policy 33</b>	Support amendments	Noted
6	Environment Agency	Policy 37 supporting text para 4.130 last sentence	Amend tidal walls dates.	Agreed.

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42	Highways England	Whole Plan <b>A27</b>	Consideration needs to be given to funding of A27 mitigations and calculation of impacts/costs. Mechanism for calculating costs would be useful once mitigations agreed; preferable to consider use of s278 agreements	Work on costs has been undertaken – was in previous iteration of Transport Study - see Infrastructure Delivery Plan.
42	Highways England	Whole Plan <b>A27</b>	In terms of impact on A27: allocations at NMF, WS and Airport have not decreased; NMF has increased; material impacts of development not reduced from 2014 plan; and so we agree that these developments will need to contribute to improvements on the A27 to ensure there are no detrimental effects to its current operation.	Noted
32	Home Builders Federation	Whole Plan <b>Duty to Co-operate</b>	The Plan is unsound because it is not positively prepared; does not meet OAN, does not meet needs of other authorities; no plan for future work to meet OAN. Not pursued Mid Sussex and Horsham sufficiently. Seek explicit commitment to early review, and alignment of other plans in HMA	It is considered that the Plan strikes a balance between meeting identified needs, and safeguarding the character of Adur. Adur has, and is, working with other local authorities in the Coastal West Sussex and Greater Brighton area to address sub-regional issues, including housing shortfalls.
25	Sussex Wildlife Trust	Whole Plan <b>environment / biodiversity</b>	Concerned that wording to deliver biodiversity in some policies has been struck out. Question soundness of the Adur Local Plan. Do not believe that plan is consistent with national policy or that it sufficiently performs its environmental role as per NPPF para 7.	While some wording regarding landscape and biodiversity has been deleted in Policy 5, the Policy still requires a site wide landscape and ecological management plan to be produced and implemented. Additionally, all development will have to comply with Policy 32: Biodiversity as well as NPPF.



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47	Boyer for Hyde	Whole Plan <b>Five year housing land supply</b>	The five year housing land supply figure does not account for the standard 10% lapse rate in respect of committed sites.	In terms of small sites of 5 dwellings or less, a 55% discount rate for non implementation is applied. This is a consistent approach applied across West Sussex and is based on historic monitoring of past completions on small sites. For larger sites of 6+ dwellings, it is considered that evidence of past delivery rates is robust and does not warrant a 10% lapse rate to be built into the 5 year housing land supply calculation. Evidence of delivery is provided by landowners, developers, agents etc. for each identified site.
47	Boyer for Hyde	Whole Plan <b>Five year housing land supply</b>	The five year housing land supply calculation should include a 20% buffer not a 5% buffer.	Justification for use of 5% buffer is included in the Housing Implementation Strategy and is based on comparison of past completion rates measured against the housing delivery target adopted at that time as advised in Planning Practice Guidance.
47	Boyer for Hyde	Whole Plan <b>Housing deliverability / trajectory</b>	There is an over reliance on the proposed site allocations to meet housing need and assumptions on timing of delivery of these homes is unrealistic.	The trajectory for the two strategic allocations has been amended in accordance with latest information provided by the site promoters.
45	Michael Hubbard	Whole Plan <b>Housing provision and water supply</b>	Objects to new homes and concerned about water supply.	Comments noted.
47	Boyer for Hyde	Whole Plan <b>Housing deliverability / trajectory</b>	Lack of flexibility; concerns over deliverability of New Monks Farm and relationship with Airport; refers to previous application at New Monks Farm; delivery issues at Shoreham Harbour; disagree with ADC trajectory	Noted.

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34	Cobbetts (ECE) (Thorntons)	Whole Plan <b>Housing deliverability / trajectory</b>	Consideration of the OAN and housing trajectory show a significant reliance on Shoreham Harbour to deliver housing in the medium term. There are delivery concerns regarding flood defences, transport infrastructure and investment, requirement for a new primary school and remediation of contaminated land.	Shoreham Harbour will make a valuable contribution to meeting housing needs. The JAAP will address many matters of detail. Work is ongoing in terms of education provision and delivery of housing on individual sites within the broad location.
27	Gladman	Whole Plan <b>OAN</b>	The Plan does not adequately deal with unmet housing need. The OAN is a significant underestimation of housing need. The Duty to Cooperate does not address the wider unmet need within the HMA. LPEG outlines how unmet need could potentially be dealt with and such proactive steps should be taken to deal with the unmet need.	Adur has, and is, working with other authorities in the Coastal West Sussex and Greater Brighton area to address cross-boundary issues, including housing shortfalls. The LPEG review is noted; however, a Government response to its findings is awaited.
32	Home Builders Federation	Whole Plan <b>OAN</b>	The OAN figure is too low. It is unsound because it is unjustified in terms of its treatment of migration and the inadequacy of the response to market pressures and the scale of affordable housing need. The DCLG figure of at least 300dpa should be the starting point. SE authorities tend to use alternative scenarios which reduce OAN to below official benchmarks. Adur reduces UPC by 50% and therefore reduces demographic starting point. Consider the starting demographic point should be 286 dpa. The Council's approach should be agreed with other authorities in the HMA.	Comments regarding the UPC are noted. Since publication of the Amendments to the Proposed Submission Adur Local Plan (2016) the OAN work has been updated to reflect Sub-National Population and Household Projections published in 2016. This updated work does not reduce for UPC.

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32	Home Builders Federation	Whole Plan <b>OAN</b>	The OAN does not make an adjustment for second homes/ vacancies although this is established practice. Should use 3% adjustment which would make OAN 294dpa	The OAN 2016 report makes an adjustment of 2.7% for vacant/second homes (derived from 2011 Census data).
32	Home Builders Federation	Whole Plan <b>OAN</b>	Not seeking specific adjustment to take London out-migration into account. However, assumptions regarding outward migration from London are another reason why reduction for UPC should not be made.	The comments regarding the UPC are noted. Since publication of the Amendments to the Proposed Submission Adur Local Plan (2016) the OAN work has been updated to reflect Sub-National Population and Household Projections published in in 2016. This updated work does not reduce for UPC. Regarding migration from London - the updated OAN 2016 provides a sensitivity analysis which considers how changing migration to and from London could influence housing need in Adur.
32	Home Builders Federation	Whole Plan <b>OAN</b>	Supports adjustment of 5dpa to account for employment, but this should be made to different demographic starting figure	Since publication of the Amendments to the Proposed Submission Adur Local Plan (2016) the OAN work has been updated to reflect Sub-National Population and Household Projections published in in 2016.
32	Home Builders Federation	Whole Plan <b>OAN</b>	The adjustment of 10dpa to account for market signals is too small. LPEG suggest 25% uplift. HBF seek uplift of at least 20%.	Since publication of the Amendments to the Proposed Submission Adur Local Plan (2016) the OAN work has been updated to reflect Sub-National Population and Household Projections published in in 2016. This revised work includes an increased uplift for market signals and affordability.

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32	Home Builders Federation	Whole Plan <b>OAN</b>	Do not understand the basis for affordable housing need falling from 233 to 141 dpa due to relets. Need evidence for this? As there is an undersupply of housing against the OAN, alternative accommodation within the market sector will be hard to find. Recommend an uplift of 20% on the demographic need to account for market signals and the affordable housing need rather than the 10dpa proposed in the Plan.	Since publication of the Amendments to the Proposed Submission Adur Local Plan (2016) the OAN work has been updated to reflect Sub-National Population and Household Projections published in in 2016. This revised work includes an increased uplift of 10% for market signals and affordability.
47	Boyer for Hyde	Whole Plan <b>OAN</b>	Does not meet OAN	Noted. However it is considered that the plan strikes a balance between seeking to meet identified needs, and safeguarding the characteristics and environment of Adur.
47	Boyer for Hyde	Whole Plan <b>OAN</b>	Propose that the OAN figure should be 324 dpa	Since publication of the Amendments to the Proposed Submission Adur Local Plan (2016) further OAN work has been updated to reflect Sub-National Population and Household Projections published in 2016. This proposes an updated OAN of 325 dpa. Major Modifications have been proposed in relation to this.
34	Cobbetts (ECE) (Thorntons)	Whole Plan <b>OAN</b>	Plan fails to meet OAN and is therefore contrary to NPPF.	Noted; however Plan addresses constraints that prevent full delivery of OAN.
34	Cobbetts (Thornton)	Whole Plan <b>OAN</b>	Does not meet OAN and has not justified under delivery. Conflicts with NPPF.	Noted; however Plan addresses constraints that prevent full delivery of OAN.

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31	Savills on behalf of Brighton & Hove City Council	Whole Plan <b>OAN</b>	The Plan does not meet the OAN.	It is considered that the Plan strikes a balance between meeting identified needs, and safeguarding the character of Adur. Adur has, and is, working with other local authorities in the Coastal West Sussex and Greater Brighton area to address sub-regional issues, including housing shortfalls.
17	Landstone (ECE)	Whole Plan <b>OAN</b>	The Plan fails to comply with NPPF as it doesn't meet OAN.	It is considered that the Plan strikes a balance between meeting identified needs, and safeguarding the character of Adur. Adur has, and is, working with other local authorities in the Coastal West Sussex and Greater Brighton area to address sub-regional issues, including housing shortfalls.
50	Philip Packham	Whole Plan <b>Parking</b>	Total lack of any requirement for any residential development to allow for the parking of commercial vehicles of the residents. This is a problem with the Southlands development which bans the parking of commercial vehicles within its boundaries and subsequently they are parked on the streets around the development.	Noted. Representation forwarded to WSCC which is highway authority responsible for parking standards.
47	Boyer for Hyde	Whole Plan <b>Plan period</b>	The Plan does not cover 15 year time period from date of adoption	The OAN has been updated ( Objectively Assessed Housing Need Update 2016) which rolls the Plan forward to 2032 to ensure a 15 year time period from the anticipated year of adoption (2017). Proposed Major Modification(s) address this matter.
32	Home Builders Federation	Whole Plan <b>SHLAA</b>	Some locations in Shoreham Harbour are not allocated in this period - i.e. SH/001/13 & SH/002/13 (both within the Western Harbour Arm).	The development of the Western Harbour Arm will be addressed through the Shoreham Harbour Joint Area Action Plan.

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47	Boyer for Hyde	Whole Plan <b>SHMA</b>	SHMA is out of date	The Coastal West Sussex SHMA has been updated through a range of work commissioned sub-regionally, and by Adur district. These include the Housing (Duty to Co-operate) Study 2013, and a range of studies which have updated the OAN for Adur (the latest being the Objectively Assessed Housing Need Update 2016). Major Modifications have been proposed to update OAN for Adur.
23	WSSC	Whole Plan) <b>S106/CIL (etc)</b> references throughout plan	Refer to section 278s	Do not consider this necessary.
17	Landstone (ECE)	Whole Plan: <b>omission site (Land at Hasler - Old Salts Farm)</b>	The Landscape study is correct that the omission site, Land at Hasler - Old Salts Farm, has a visual sensitivity of medium-low.	Agreed.
17	Landstone (ECE)	Whole Plan: <b>omission site (Land at Hasler - Old Salts Farm)</b>	A group of trees on the omission site, Land at Hasler - Old Salts Farm, are the subject of a TPO. The representation proposes tree enhancement measures and a strategy for replacement of trees where appropriate.	TPO only recently designated.
17	Landstone (ECE)	Whole Plan: <b>omission site (Land at Hasler - Old Salts Farm)</b>	Site is not of significant ecological value. Any impact can be mitigated	Preliminary Ecological Assessment for site commissioned by the Council noted there was significant biodiversity on site associated with ditches and wetlands. However, there are no specific ecological designations for the site.

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17	Landstone (ECE)	Whole Plan: <b>omission site (Land at Hasler - Old Salts Farm)</b>	Re: omission site, Land at Hasler - Old Salts Farm. A technical solution to overcoming surface water and ground water issues is possible. Completion of Adur Tidal Walls will facilitate development. Opportunity should be taken by Adur DC to discuss mitigation measures and technical solutions so the site can come forward for residential development within the medium to long term of the Adur Plan period.	This has not been demonstrated by Landstone in any satisfactory way. Given the complex drainage system on the site and the groundwater and tidal issues, an FRA would be required.
31	Savills on behalf of Brighton & Hove City Council	Whole Plan: <b>omission site (Mill Hill site)</b>	The Mill Hill site should be considered available in the SHLAA.	Assessed as 'available but not suitable for development.' SHLAA 2016 will be published in December 2016 when WSCC monitoring data is available.
31	Savills on behalf of Brighton & Hove City Council	Whole Plan: <b>omission site (Mill Hill site)</b>	Disagree with landscape assessment of Mill Hill site. Character compromised by presence of A27 which acts as major physical barrier. Southern and eastern parts of site less visible and therefore less sensitive.	Landscape analysis indicates that the proposed development would cause adverse landscape and visual effects. Mill Hill has high landscape sensitivity. South Downs National Park has also expressed concerns regarding the development of Mill Hill.
31	Savills on behalf of Brighton & Hove City Council	Whole Plan: <b>omission site (Mill Hill site)</b>	Development at Mill Hill site could provide an opportunity to protect the northern part of the site through provision of publicly accessible open space and to enhance biodiversity and ecology.	Landscape analysis indicates that the proposed development would cause adverse landscape and visual impacts. South Downs National Park Authority have also expressed concerns regarding the development of Mill Hill.
31	Savills on behalf of Brighton & Hove City Council	Whole Plan: <b>omission site (Mill Hill site)</b>	Access to Mill Hill site can be achieved to a level that is an improvement on existing situation. Evidence submitted.	West Sussex County Council would have concerns that the mitigation outlined in the representation may not be sufficient to achieve safe access and traffic movement, therefore would not support a site allocation in this location at this time without further transport and access work being undertaken.

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47	Boyer for Hyde	Whole Plan: <b>omission site (New Salts Farm)</b>	Boyer have submitted a S&E test and FRA for their omission site, New Salts Farm	The sequential test provided is acceptable. The FRA provided in support of the Exception Test needs to provide further detail and the Environment Agency have expressed a significant number of concerns.
47	Boyer for Hyde	Whole Plan: <b>omission site (New Salts Farm)</b>	Could develop parts of site in flood zone 3a, prior to tidal walls being developed. Compare site to Airport	Does not address groundwater issue; airport is not really comparable to New Salts Farm as it is an employment site, not residential; exceptions test therefore not required for airport.
47	Boyer for Hyde	Whole Plan: <b>omission site (New Salts Farm)</b>	Landscape: ADC study 2012 supports development in this location	2012 study does not support development in this location, but instead suggests how impact of development in location could be reduced through design. 2016 Landscape Sensitivity Assessment is clearer about the value of the New Salts Farm area from a landscape and green gap perspective.
47	Boyer for Hyde	Whole Plan: <b>omission site (New Salts Farm)</b>	Assessment of reasonable alternatives in SA is inadequate; queries specific scenarios.	The SA alternative assessment does not include New Salts Farm because, as shown in the SA, it is not considered a reasonable alternative at this stage due to uncertainties and concerns regarding flood risk and delivery.
47	Boyer for Hyde	Whole Plan: <b>omission site (New Salts Farm)</b>	Have provided a Flood Risk Assessment, Ecology Assessment, Landscape Assessment and Preliminary Transport Appraisal and vision document, and OAN review	The FRA is noted; there are a number of outstanding issues and given previous concerns raised by the Environment Agency and WSCC regarding the site, it would be premature to allocate this site in the Local Plan.



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34	Cobbetts (ECE) (Thorntons)	Whole Plan: <b>omission site (Shoreham Gateway site)</b>	The S&E test and SA needs updating to take account of Adur Tidal Walls which will change those parts of Shoreham Gateway that are currently flood zone 3b to 3a.	The Shoreham Gateway site has not been included in the Sequential and Exception Test due to concerns regarding the impact of the River Adur on the setting of the River Adur and Old Shoreham Conservation Area. The Sequential Test takes account of the Shoreham Adur Tidal Walls Scheme.
34	Cobbetts (ECE) (Thorntons)	Whole Plan: <b>omission site (Shoreham Gateway site)</b>	Re the landscape study evidence base, 2012 report and 2016 update. The change in the assessment of the Shoreham Gateway site's landscape sensitivity is unjustified. Tidal walls would have an urbanising impact and sensitivity of area has also been increased due to inclusion of River Adur in landscape character area. Should revert to assessment of medium-low landscape sensitivity as per 2012 study. Evidence base currently unsound.	The site makes a particularly strong contribution to the landscape setting of the River Adur and the SDNP and is located at one of the principal gateways to the SDNP. The retention of the land to the north of the ATW as undeveloped countryside, with an open, pastoral character would enhance the landscape setting of the River Adur, contributing to the visual continuity provided by the river channel and the pastures alongside as the river passes beneath the A27 bridge structures and the perceived 'green river valley link' between the Downs and coastal plain. Importantly, retention of this open area of countryside would provide a natural landscape setting to the settlement of Old Shoreham, avoiding a situation where the A27 becomes an abrupt boundary between the settlement and the SDNP. The change in landscape sensitivity in the 2016 Landscape Sensitivity Assessment reflects the inclusion of the River Adur within the character area.

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34	Cobbetts (ECE) (Thorntons)	Whole Plan: <b>omission site (Shoreham Gateway site)</b>	Re: evidence base - Landscape Study - Update Shoreham Gateway. Assessment has been made on predication of development at other sites not yet allocated i.e. Shoreham Airport and assessment is therefore premature. Loss of commercial unit at Gateway site would significantly alter impact of development in this location and design alterations to residential component would also reduce impacts.	The site makes a particularly strong contribution to the landscape setting of the River Adur and the South Downs National Park (SDNP) and is located at one of the principal gateways to the SDNP. The retention of the land to the north of the ATW as undeveloped countryside, with an open, pastoral character would enhance the landscape setting of the River Adur, contributing to the visual continuity provided by the river channel and the pastures alongside as the river passes beneath the A27 bridge structures and the perceived 'green river valley link' between the Downs and coastal plain. Importantly, retention of this open area of countryside would provide a natural landscape setting to the settlement of Old Shoreham, avoiding a situation where the A27 becomes an abrupt boundary between the settlement and the SDNP.
34	Cobbetts (Thornton)	Whole Plan: <b>omission site (Steyning Road / Gateway site)</b>	As plan does not meet OAN it should allocate Steyning Road / Gateway site.	The site makes a particularly strong contribution to the landscape setting of the River Adur and the South Downs National Park (SDNP) and is located at one of the principal gateways to the SDNP. The retention of the land to the north of the ATW as undeveloped countryside, with an open, pastoral character would enhance the landscape setting of the River Adur, contributing to the visual continuity provided by the river channel and the pastures alongside as the river passes beneath the A27 bridge structures and the perceived 'green river valley link' between the Downs and coastal plain. Importantly, retention of this open area of countryside would provide a natural landscape setting to the settlement of Old Shoreham, avoiding a situation where the A27 becomes an abrupt boundary between the settlement and the SDNP.

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6	Environment Agency	Whole Plan's Evidence base <b>IDP</b>	P34 update reference to tidal walls.	IDP text has been updated.
6	Environment Agency	Whole Plan's Evidence base <b>IDP</b>	P67/68 update text	IDP text has been amended as requested, to reflect current situation.
25	Sussex Wildlife Trust	Whole Plan's Evidence base <b>IDP</b>	GI projects have the opportunity to progress as favourably as other projects with clear associated costing. Improving level of detail within IDP will give these projects a better chance of being considered when money from CIL is distributed.	Noted. IDP contains best level of information known at this stage.
32	Home Builders Federation	Whole Plan's Evidence base, <b>Duty to Cooperate Statement 2016 (para 3.14)</b>	References to LEP funding already awarded. Need to explain role of this investment.	Paragraph 2.35 gives some explanation as to the role of LEP funding. Greater detail can be given through the emerging Shoreham Harbour Joint Area Action Plan process.