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Date: 28 November 2014

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Dear Colette,

Proposed Submission Adur Local Plan 2014

Thank you for the opportunity to comment on the submission Adur Local Plan.

Duty to cooperate

Adur is an adjacent authority to Brighton & Hove and the issue of housing requirements crosses our respective boundaries. The City Council considers that housing and other issues (including transport, employment, Gypsy and Travellers sites) are sub regional in nature and consequently best dealt with through effective co-operation at a strategic level as well as by discussions between individual authorities.

A Housing Duty to Co-operate Study was commissioned by the local authorities of Adur, Arun, Brighton & Hove, Chichester, Lewes and Worthing within the Coastal West Sussex Housing Market Area (HMA) together with the South Downs National Park Authority.

The Study concluded that an objective assessment of housing need for the city would fall between 800–1000 dwellings per annum or 16,000–20,000 dwellings to 2030. An update to this Study produced in April 2014 saw the objectively assessed need for Brighton & Hove increase to 900-1200 dwellings per annum or 18,000-24,000 dwellings to 2030.

Based on the physical capacity and significant constraints of the city, the housing target set out in the draft Brighton & Hove City Plan Part 1 was 11,300 new dwellings by 2030. This equated to an annual average provision of 565 dwellings over the plan period (2010–2030). Following the examination of the City Plan, the Planning Inspector required further work to explore all opportunities to increase the housing target as she considered that the council should seek to meet the higher level of the objectively assessed housing need. This further work included a revised assessment of the potential of the urban fringe for housing. The outcome of this work potentially increases the housing target for the City to 13,200 homes or 660 dwellings per annum (2010-2030). This change was approved by the city council's Policy and Resources Committee on 16 October 2014 and is currently out to consultation (until 16 December).

Brighton & Hove is subject to very significant constraints on the ability of the city to physically accommodate all new development needed within the city, particularly due to the sea to the south and the South Downs National Park to the west, north and east. The revised City Plan's housing target for a minimum of 13,200 new homes reflects the capacity and availability of land/sites in the city, the need to provide for a mix of homes to support the growth and maintenance of sustainable communities, the need to make provision in the city for other essential development, and the need to respect the historic, built and natural environment of the city.

The proposed housing target means that Brighton & Hove is some way short of being able to meet its own objectively assessed full housing requirement and as such, through Duty to Co-operate is required to contact other authorities for assistance in meeting its shortfall. The city council recognises that housing provision is a key cross-boundary issue within the sub-region with many other authorities having significant challenges in meeting their objectively assessed needs. Ongoing cooperation with Adur District and other authorities within West Sussex and elsewhere is welcomed to address housing and other strategic planning issues. It is important that all reasonable means of maximising housing provision across the area are pursued.

It can be confirmed that constructive discussions and joint work has taken place between both authorities in particular through the sub-regional groupings of Coastal West Sussex Planning Board, the Greater Brighton Economic Board and the Local Enterprise Partnership. This work is positive and ongoing, for example a review of the agreed Local Strategic Statement is currently underway.

Housing

In the Adur Local Plan it is proposed that a total of, 3488-3638 dwellings can be delivered over the Plan period which equates to an annual average of 174-182 dwellings. It is noted that two sustainable greenfield urban extensions have been identified which will deliver 930 to 1080 dwellings following an assessment of a number of greenfield sites undertaken through the Sustainability Appraisal, Sequential and Exceptions Test, and other evidence studies taking into account a range of issues and constraints, including biodiversity, flood risk, and landscape (paragraph 2.21). Consequently, whilst potentially meeting the lower end of the objectively assessed need figure (3600-4800), a shortfall of 1162-1312 dwellings remain against the full objectively assessed need figure of 4800 over the Plan period. Whilst all reasonable means of maximising housing provision across the area should be pursued, the council is sympathetic to the difficulties Adur finds itself in not being able to meet its OAN in full.

Employment Land

It is noted that 41,000 square metres of land will be allocated for appropriate employment generating uses in Adur up to 2031 against the Employment Land Review recommendations that the Local Plan should make provision for the following scale of change in employment floorspace (in net terms) over the 2011-31 period:

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- B1a/b (Office and Research and Development): Demand for an additional 15,000 to 20,000 sqm net;
- B8 (Warehouse): Demand for an additional 35,000 to 40,000 sqm net.

The City's functional economic area extends well beyond its administrative boundaries and this, together with public sector funding restraint and the new landscape for economic development, is driving co-operation with neighbouring local authorities and with the Coast to Capital LEP. The need to bring forward the regeneration of key employment sites is acknowledged in the Coastal West Sussex and Greater Brighton Local Strategic Statement the Greater Brighton City Deal and the Coast to Capital Strategic Economic Plan.

Policy 7 - Shoreham Airport

It is noted that an allocation for up to 15,000 sq m of employment land is proposed at the north east corner of the Airport. Supporting text at paragraph 2.76 indicates that: '*without significant impacts on the open character of the area between Shoreham and Lancing and key views to and from the South Downs National Park, as well as Airport operations. However, this is dependent on new development being sensitively designed and sited.*' The principle of providing additional opportunities for employment land at the airport is supported given the potential for regeneration benefits to the wider area. However, as the joint freeholder we would draw the Council's attention to a covenant in the lease which states:

"During at least the first 35 years of the term not to build on any runway or any part thereof or any replacement runway and to run and manage the premises or the appropriate part or parts thereof by providing airport facilities and services together with associated facilities or commercial operations that benefit Shoreham Airport or benefit from the operation of Shoreham Airport..."

Consideration should be given to the inclusion of wording in the policy to clarify that development of the north east corner of the site should not jeopardise the runway use and airport operations.

Policy 8 Shoreham Harbour Regeneration Area

BHCC is already working with Adur District on the Joint Area Action Plan for Shoreham Harbour and welcomes the inclusion of the aims of the JAAP in the Local Plan. We look forward to a continuation of cooperation between the authorities on this issue.

We would support the setting up of measures such as those described in Paragraph 4.76 to reduce the negative effects on amenity and air quality caused by HGVs accessing the Harbour.

The City Council welcomes the acknowledgement in the Plan that the Harbour is regionally important for the landing, processing and handling of minerals. The importance of marine

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dredged aggregates is expected to increase for Brighton & Hove and East Sussex over the forthcoming years as permitted on-shore reserves are depleted.

The importance of Shoreham Harbour in securing a steady supply of aggregates to support building activity and economic growth in the city is therefore likely to increase.

Due to the importance of the provision and safeguarding of minerals wharfage, the JAAP partners, together with South Downs National Park Authority and East Sussex County Council have signed a Statement of Common Ground (SOCG). The purpose of the SOCG is to underpin effective cooperation and collaboration between the partners in addressing strategic cross-boundary issues as they relate to planning for minerals infrastructure and safeguarding in Shoreham Harbour.

Wharf capacity is safeguarded under Policy WMP15 of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan (not WMP14 as stated), and the Plan was adopted in 2013, not 2012. The emerging East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan specifically identifies wharves at the harbour as safeguarded under Policy WMSP9 of the recent Consultation Draft, and this will be the mechanism for assessing the impact on wharf capacity at the Brighton & Hove section of the Port from any development proposals in this area. As a result development proposals affecting minerals wharves are required to demonstrate that there is no net loss of capacity for handling minerals within the port as an impact of new development. A similar policy is likely to be included within the emerging West Sussex Minerals Local Plan. It is also important that any development on sites proximate to the wharves does not prejudice their ability to continue to operate.

The City Council is proposing an amendment to the Shoreham Harbour Policy (DA8) in the Brighton & Hove City Plan to reflect opportunities for large scale, low carbon energy technologies at the Harbour particularly the opportunities to utilise waste heat arising from activities at the Harbour. Adur District Council is a partner with the City Council in the development of studies to investigate opportunities for a heat network anchored at Shoreham Harbour therefore it will be important that any opportunities identified by this work are supported by Plan policies. Consideration should be given to the inclusion of wording in the Adur Local Plan similar to that used by the City Council within DA8 Shoreham Harbour and reproduced below:

3.112 The Brighton & Hove Energy Study has identified particular potential for District Heating networks in and around Shoreham Harbour within a long list of priority areas.

Development within the long-list of priority areas will be encouraged to consider low and zero carbon decentralised energy and in particular heat networks and required to either connect where a suitable system is in place, or would be at the time of construction, or design systems so that they are compatible with future connection to a network. The potential will be further investigated during the preparation of the JAAP

Policy 12: Southwick and Fishersgate

It is noted the site known as Eastbrook allotments is identified as having potential for mixed use development. In principle this is welcomed by the BHCC as the adjoining Local Planning Authority. The existing allotments will be retained but the site provides some

development opportunities which could include some residential (south-western part of site – subject to suitable access), employment uses (B1 and B8), training and educational facilities as well as open space, allotments and a small-scale community use. Potential uses will be explored in more detail through a development brief and no doubt with BHCC as landowner.

Policy 29: Transport and Connectivity

The policy approach on Transport and Connectivity in the Adur Local Plan provides strong links to priorities in Brighton & Hove City Plan in relation to transport policy. This is particularly welcome in relation to a coastal sustainable transport system, effective cycle networks and reducing the need to travel.

Policy 35: Pollution and Contamination

The acknowledgement at paragraph 4.111 of Brighton & Hove's AQMA is welcomed. The Brighton & Hove AQMA, which includes the A259, immediately borders Adur, and any proposals that could alter traffic flows and routing arrangements should bear in mind the potential impact on the AQMA. This is particularly relevant to the routing arrangements of HGVs and other vehicles serving Shoreham Harbour.

Yours sincerely,



Liz Hobden
Planning Policy Manager