
Fwd: Submission Adur Local Plan 2016: Further Evidence

1 message

Elaine Rousseau <elaine.rousseau@adur-worthing.gov.uk>

21 December 2016 at 13:34

To: Jane Proctor <jane.proctor@adur-worthing.gov.uk>, Planning Policy <adurplanningpolicy@adur-worthing.gov.uk>

----- Forwarded message -----

From: **Simon Dodd** <Simon.Dodd@emrgroup.com>

Date: 21 December 2016 at 13:14

Subject: Submission Adur Local Plan 2016: Further Evidence

To: "adurplanningpolicy@adur-worthing.gov.uk" <adurplanningpolicy@adur-worthing.gov.uk>

Cc: "elaine.rousseau@adur-worthing.gov.uk" <elaine.rousseau@adur-worthing.gov.uk>, Ian Nixon <Ian.Nixon@emrgroup.com>

We refer to the email below requesting any comments in regards to the two revised documents that have been submitted as follows

CD07/20 - Strategic Housing Land Availability Assessment (SHLAA) Update 2016

CD07/21 - Adur Housing Implementation Strategy 2016

You will be aware had a number of meetings with the Council over the years. However very little progress appears to have been made to find an alternative location for our very important scrap metal recycling yard.

We are therefore very surprised at the claims made in the Assessment and Strategy listed above that Shoreham Harbour can provide suitable land in the short term for 1100 houses.

Indeed for the reasons given below we do not accept that as claimed the land on either side of our yard will for the foreseeable future be a suitable location for residential. Certainly we cannot accept that it is deliverable in the timescale quoted in the land assessment.

In particular we fail to understand how Kingston Wharf (which immediately adjoins the busiest part of our site) will be able to deliver 140 units from 2018.

The allocation of land by the Council should aim to separate noise sensitive uses from noise producing uses. High noise levels from our legitimate and long established Scrap Metal yard makes the locality unsuitable for residential use.

For convenience I summarise the main points that we have previously made which include

- Our site on Brighton Road is the largest Metal Recycling in Worthing and Adur Council areas and is recognised as a major component of the Waste Processing Capacity in the West Sussex.
- West Sussex in its Waste plan aims to achieve net self sufficiency in the transfer, recycling and treatment of waste
- Under Policy W2 – Safeguarding of Waste Management sites and Infrastructure in the West Sussex Waste Plan states that developments that prevent or prejudice the use of existing waste management sites will not be permitted unless a suitable replacement site has been identified.
- The EMR site processes the whole range of ferrous and non ferrous metals with a large shear, non ferrous building and an End of Life (ELV) vehicle facility as well as a shipping quay. The total site area is over five acres.

- Our business by its very nature generates noise and traffic. We appreciate that whilst our yards tend not to be popular neighbours and are not pretty they are necessary if the country is to achieve their recycling targets. Local Councils are obliged to make provisions for such facilities.
- We provide an essential service for both the public and private sector in Adur and Worthing processing a wide variety of waste metal products.
- The acquisition of scrap metals ensures that efficient recycling is achieved and is a helpful source of income for local businesses.
- There is a real need for our facilities and without adequate protection measures from sensitive receptors the long term operation of the waste facility may be compromised.
- Placing housing in such a location would represent a real threat to our business. It is a site into which we have invested a significant sum and we will have no choice but to take every step to protect our position.
- We have previously voiced concerns that despite aspirations for the redevelopment of the Shoreham Harbour area no replacement waste sites in Adur or Worthing was identified in the West Sussex Waste Plan.
- Indeed because of this omission we had active discussions over the last few years with the Council to encourage them to identify such a site.
- The only location suggested as a possibility was some land owned by the Council at Decoy Farm in Worthing. However very limited if any progress seems to have been made on Decoy Farm and we still have doubts whether it is suitable.

We would request that the Inspector decide that Shoreham Harbour should not be a suitable location for such housing. That the delivery strategy is therefore not justified.

We would also ask for the opportunity to speak at the hearing.

Regards

Simon Dodd Group Property Manager

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From: Elaine Rousseau [<mailto:elaine.rousseau@adur-worthing.gov.uk>]

Sent: 01 December 2016 12:09

Subject: Submission Adur Local Plan 2016: Further Evidence

Dear Sir/madam

Adur District Council has submitted the Adur Local Plan 2016 to the Secretary of State for independent examination in October. At this time supporting documentation was also submitted and can be found on the Council's website at:

<https://www.adur-worthing.gov.uk/alp-submission-2016/>

The Council has now published further evidence which supersedes CD06/4 - Housing Implementation Strategy 2016 and CD09/2 Adur Strategic Housing Land Availability Assessment (SHLAA) Update 2015.

The updated documents can be viewed at:

CD07/20 - Strategic Housing Land Availability Assessment (SHLAA) Update 2016

<https://www.adur-worthing.gov.uk/media/media,142487,en.pdf>

CD07/21 - Adur Housing Implementation Strategy 2016

<https://www.adur-worthing.gov.uk/media/media,142491,en.pdf>

The Inspector appointed to examine the Adur Local Plan has requested that any comments on these two new documents should be submitted to the Council by Thursday 22nd December 2016 at the following address:

adurplanningpolicy@adur-worthing.gov.uk

If you have any queries, please contact Jane Proctor on 01273 263244

Regards

Jane Proctor

Senior Planning Officer, Adur & Worthing Councils

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Email: jane.proctor@adur-worthing.gov.uk

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