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Dear Sir

Re: Adur Local Plan Examination – Response to Council’s Homework

We write on behalf of Hyde New Homes in response to the Homework Responses prepared by the Council following the hearings into the Adur Local Plan. Specifically we wish to provide comment in respect of ALP025D and ALP025E.

Hyde New Homes have an interest in the site known as New Salts Farm, an omission site in the Adur Local Plan.

For reasons set out in our Reps, Hearing Statement and raised at the Hearing Sessions for the Adur Examination in Public we are of the view that the Adur Local Plan is unsound as it is not positively prepared, given it does not meet its OAN and has not engaged every effort to do so, is not justified as it has not considered all reasonable alternatives to meet its OAN and is not consistent with the policies of the NPPF specifically paras 14, 17, 47 and 152, as it has not struck the right balance in terms of sustainable development given the shortfall in meetings its OAN. Further it is not consistent with paras 156 and 157 of the NPPF which require a Local Plan to include strategic policies to deliver the homes needed in the area and plan positively for the development required in the area.

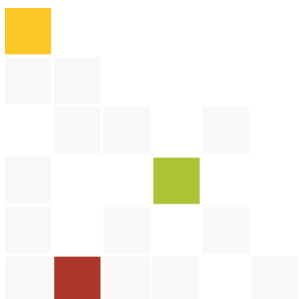
There is no new evidence or explanation provided in the Council’s homework responses which give us reason to change our view.

Mid Sussex Inspectors Interim Findings

The Inspector will be aware of the Inspector’s Interim Conclusions on the Mid Sussex Local Plan which is also currently going through Examination. We are of the view that there are a number of similarities and comparables for the Adur Local Plan to the Inspector’s interim findings for the Mid Sussex Local Plan.

Specifically the Inspector highlights the Council’s quick rejection of a number of sites on the basis of limited evidence and without consideration of how constraints may be resolved or mitigated. He also highlights an inconsistency in approach to sites allocated in the plan and those rejected.

These are points which we have made in respect of New Salts Farm and the approach to the assessment of sites in the Adur Local Plan, SHLAA and Sustainability Appraisal.



Specifically in allocating two strategic sites at New Monks Farm and West Sompting, Adur have accepted that there is a need to develop in the existing green gaps and on areas within the Flood Zone to deliver new homes, and accepted that the impact in respect of these sites could be mitigated. However Adur have not achieved the correct balance and at the same time have rejected the potential for New Salts Farm (and other omission sites) to also assist in meeting housing need. This position, originally adopted by Adur in 2012, has been maintained throughout the preparation of the Local Plan despite an ever increasing OAN, which the Council should be making every effort to meet, and a significant level of evidence being presented on behalf of Hyde New Homes to demonstrate how New Salts Farm could be developed without constraint.

Green Gap and Landscape

We have demonstrated in our Reps and supporting studies, including a landscape capacity study, that New Salts Farm does have capacity for development and any impacts could be mitigated. Further that the development of the site would not result in coalescence or harm the setting and character of the settlements of Lancing or Shoreham by Sea.

We have therefore provided evidence that demonstrates there is no significant and demonstrable harm arising from development of this site. Further the Council's own evidence does not demonstrate to the contrary that there is significant and demonstrable harm arising from the development of the site. Specifically the council's evidence only vaguely refers to a possibility of a 'risk' that further development would contribute to coalescence but this has not actually been tested.

The latest evidence provided in ALP025E does not provide any additional evidence which would change our view. Our full response to ALP025E is enclosed with this letter.

Flood Risk

We fully accept the importance to be placed on flood risk in considering the potential of a site to be allocated for residential development. Nevertheless, we are of the view that there is a technical solution to flood risk constraints at the New Salts Farm Site.

Since the hearings, we have now agreed with the Environment Agency that there is no tidal or fluvial flood risk constraint to allocation of the site in their view.

Although WSCC and Adur have outstanding concerns, these, we believe are without evidence, and seek a level of detail not warranted for site allocation and which goes well beyond that sought for proposed allocated sites.

A full response is set out in our responds to ALP025D enclosed with this letter.

Site Allocation

As set out in our Reps, Hearing Statements and the attachments to this letter, and the detailed evidence documents which support those Reps we are of the view that the land at New Salts Farm can be developed without harming the objectives of the Shoreham / Lancing Green Gap.

We have, nevertheless, taken on board comments and feedback received from Adur and their advising consultants relating to their concerns about the Green Gap and have developed a revised

scheme layout which demonstrates a further option for development of the site which has the added benefit of providing a larger landscape buffer to the east of the site responding to the Councils concerns. Further to this we have demonstrated that there is a technical solution to address flood risk constraints identified at the site with full details to be established in drawing up a detailed planning application.

The site has therefore been shown to be available, suitable and achievable with no outstanding constraints and should be considered deliverable and able to contribute towards meeting housing need in the District.

This has to be considered in the wider context of the significant housing shortfall in the Proposed Submission Adur Local Plan, which is currently only meeting 54% of the OAN for the district.

In addition there is a significant acknowledged level of unmet housing need across the Housing Market Area which is becoming more difficult to meet in Wealden, Lewes and Mid Sussex as a result of the Ashdown Forest constraints. This puts further pressure on all districts within the Housing Market Area to continue to ensure that they are making every effort to meet their own housing need.

In this respect, Adur have not demonstrated that they are making every effort to meet housing need in the District as there are sites, which have been demonstrated to be deliverable, without constraints, and yet have not been allocated within the Adur Local Plan for new housing.

There is no evidence presented to date which suggests that the allocation of New Salts Farm would have significant or demonstrable adverse environmental impacts which would warrant omission of the site from the Local Plan when weighed in the balance against the positive social and economic impacts arising from delivering more housing, including affordable housing.

Adur has not achieved the correct balance in meeting the three dimensions of sustainable development in their Local Plan and for reasons expressed throughout our Reps we are of the view that the Adur Local Plan cannot be found sound at this stage.

We submit that in order for the Adur Local Plan to be found sound, the land at New Salts Farm should be allocated for residential development in order to contribute towards meeting housing need, including affordable housing need, in the district and address the deficiencies in the Adur Local Plan.

We have set out below the proposed policy wording for the site allocation which has been amended from that originally submitted with our Reps, and seeks to address the concerns raised by Adur in respect of the constraints they have identified at the site.

Proposed Policy Wording

Land at New Salts Farm (within the area shown on Map []) will be allocated for residential development comprising:

300 - 450 homes

30% of all homes should be affordable, providing a mix of types and tenures in accordance with identified needs.

Suitable access onto Brighton Road in agreement with WSCC

Provision or funding of mitigation for off site traffic impacts on the Strategic Road Network and local roads where required.

Provision or funding of sustainable transport infrastructure including public transport and cycle, pedestrian and equestrian links to Lancing, Shoreham by Sea and the South Downs National Park where required.

Site specific travel behaviour initiatives which encourage sustainable modes of transport. (This should include a package of travel behaviour initiatives such as residential travel plans).

Developers will need to work with Adur District Council, West Sussex County Council and the Environment Agency to ensure that tidal and fluvial flooding as well as surface water and groundwater flooding are adequately mitigated without worsening flood risk elsewhere. A Flood Risk Assessment (FRA), which will include a site wide drainage strategy, will be required at the planning application stage. The FRA must take account of and seek to facilitate relevant recommendations of the Lancing Surface Water Management Plan.

A site wide drainage management plan should be produced and implemented to the satisfaction of the local planning authority and WSCC to ensure the long term maintenance of the drainage strategy for the site.

A site wide estate management plan should be produced and implemented to the satisfaction of the local planning authority to ensure the long term maintenance and management of estate roads, pavements, and open space.

No development shall take place within those parts of the site currently designated as Flood Zone 3b (functional floodplain) until the relevant section of the Shoreham Adur Tidal Walls has been completed.

As part of a Landscape Strategy / Green Infrastructure Strategy for the site, the following are to be delivered:

- Ecological enhancements to address safeguarding and enhancement of biodiversity

assets

- Retention and enhancement of the existing network of ditches on site for drainage and ecological benefits.
- Openspace and recreation areas (to include children's play areas) located within the development in accordance with Council standards
- Strategically sited areas of landscaping and green space to provide a distinctive green edge to the east and north forming a buffer between the development and New Salts Farm Road and the development and the railway line.
- Bioretention areas to provide landscaping, open space and recreation areas as well as accommodating surface water in extreme flood events. These should be strategically sited to correspond with the above green edge.
- A site wide landscape and ecological management plan to be produced and implemented to the satisfaction of the local planning authority to ensure the long term maintenance of retained and newly created habitats on site.

Development of this site, the location and layout of built development, green infrastructure, landscaping and bioretention areas is to be based on the following principles and site specific requirements:

- Development must respect the landscape of the surrounding countryside and South Downs National Park.
- Affordable housing is to be distributed throughout the whole development site
- The development is to be connected to sewerage and water distribution networks at the nearest points of adequate capacity, as agreed with Southern Water
- Built development should be directed towards the west of the site and landscaping / bio retention areas to the east and north to ensure an appropriate landscape buffer to New Salts Farm Road and the

Infrastructure requirements are to be secured through CIL/s106/planning conditions as appropriate

ALP025A – Review of Adur Local Plan

We welcome the council's proposal to include reference to a review of the Adur Local Plan within 5 years, as set out in response ALP205A. However, we are of the view that this should be clearly worded so as to require consideration to be given to sites within Adur, as well as how unmet need may be met outside of the District boundaries. As has been demonstrated through our work to date to promote the New Salts Farm site, there are sites available within the district which could deliver additional homes to meet housing need in the District without constraint. Where these are not found to be deliverable and achievable at this stage of the plan, they must be reconsidered as part of a review of the Adur Local Plan within 5 years.

Should the Inspector consider it appropriate we would be happy to attend a further Hearing Session to specifically discuss the omission site known as New Salts Farm.

We trust that the information and evidence we have provided to date is clear, and demonstrates that there are no outstanding constraints to the development of the site known as New Salts Farm. Should the Inspector or Council require any further information please do not hesitate to contact us.

In the meantime we would be grateful if you would keep us informed of the next stages of the Examination in Public and any Interim Findings of the Inspector.

Yours sincerely



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Response to ALP025D

Response to ALP025E