



## Submission Adur Local Plan Main Modifications Representation Form

Return Address: [adurplanningpolicy@adur-worthing.gov.uk](mailto:adurplanningpolicy@adur-worthing.gov.uk)

Or:

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

Or hand in at:

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


Please return to Adur District Council by midnight 26th July 2017.

Late representations will not be considered.

**Please note that at this stage, representations are only being sought on whether the Main Modifications to the Plan are sound and/or legally compliant. Please do not repeat your previous comments as these have already been considered by the Inspector.**

Comments received on the proposed Main Modifications within the time period will be considered by the Planning Inspector as part of the examination of the Adur Local Plan.

Comments may also be made on this form in relation to the Addendum to the Sustainability Appraisal of the Adur Local Plan.

 Use of your information: Respondent details and representations will be forwarded to the Inspector for consideration. All documents will be held by Adur District Council and representations will be published including on the internet e.g. [www.adur-worthing.gov.uk](http://www.adur-worthing.gov.uk). Personal contact details (address, email and phone number) will be removed from published copies of representations. Your information will be handled in accordance with Data Protection Act 1998.

Contact details will be added to the Adur Planning Policy consultees database to keep you informed on the progress of the Adur Local Plan and other related documents.

Please tick if you do **not** want to be informed.

This form has two parts:

- i. Part A - Respondent Details. You only need to fill this in once.
- ii. Part B - Your representation(s). Please fill in a separate sheet for each representation you make.

**It is recommended that you read the Guidance Notes provided for an explanation of terms used in this form**

**Part A – Personal Information**  
You only need to complete this section once

**Personal Details**

First name **Mark**

Last name **Milling**

Organisation **Lancing College**  
(where applicable)

Address line 1 **Lancing**

Address line 2 **West Sussex**

Address line 3

Post Code **BN15 ORW**

Telephone

Email address

**Agent's Details** (if applicable)

First name **Marie**

Last name **Nagy**

Organisation **Teal Planning Ltd**

Job Title **Director**

Address line 1 **Brentano Suite, Solar House**

Address line 2 **915 High Road, North Finchley**

Address line 3 **London**

Post Code **N12 8QJ**

Telephone

Email address

## Part B – Representation

Please use separate sheets for each Main Modification you wish to comment on.

1. Which Main Modification to the Adur Local Plan does this representation relate to?

**Amendments relating to:**

Main Modification no: **MM4 and MM5 – Policy 4 – Planning and Economic Growth**

or

Sustainability Appraisal

*(Please state which part):*

**Please go to Q6 to comment on the Sustainability Appraisal**

2. Do you consider the Main Modification(s) to be: (tick as appropriate)

2.1 Legally Compliant    Yes                          No   

2.2 Sound                      Yes                          No   

**Please read the Guidance Note for guidance on legal compliance and soundness.**

**If you have ticked no to 2.1, please continue to Q4.**

**If you have ticked no to 2.2, please continue to Q3.**

**If you have ticked yes to 2.1 and 2.2 please go to Q7.**

3. Do you consider the Main Modification(s) to the Adur Local Plan to be unsound because it is not: (tick as appropriate)

3.1 Positively Prepared                     

3.2 Justified   

3.3 Effective   

3.4 Consistent with National Policy

4. **If you consider the Main Modification(s) to the Adur Local Plan to be unsound or not legally compliant, please explain why in the box below:**

**Background**

The floorspace requirements referenced in Policy 4 are derived from the Adur Employment Land Review 2014.

Para 2.40 to 2.42 of the Submission Local Plan summarise that the required floorspace is for **additional Class B1 to B8 employment uses**.

Para 2.45 acknowledges that it is very unlikely that the full requirement will be provided within Adur, due to **limited capacity** arising from a number of **environmental constraints**. As such Adur will need to **rely on neighbouring authorities to meet its needs**.

In spite of these requirements and constraints, Para 2.43 states that other employment generating uses such as retail, leisure and service industries also make a significant contribution to the economy.

This flexible definition of employment generating uses is confirmed in the Glossary of the Submission Local Plan as "... B1, B2 and B8 uses, public and community uses and main town centre uses (but excludes housing development)" and this also follows the definition in the NPPG for Economic Development Uses.

Para 2.43 goes on to specify that these **Non Class B Uses** will be focused in town centres and other **locations within the Built Up Area Boundary**.

The proposed Built Up Area Boundary goes on to **include the New Monks Farm site**, with its employment space defined only as being required to be **'appropriate'**.

This background assessment and definition of employment space remains unchanged by the Main Modifications.

The required **amount of floorspace** only is proposed to be defined now as a **minimum rather than an approximate requirement**.

**Objection**

Adur District has acknowledged that it has an objectively assessed requirement for an amount of Class B floorspace which is unlikely to be met within the District. It is therefore appropriate for Policy 4 to be amended to refer to a minimum rather than to an approximate amount of new employment space, subject to the proposed development that does come forward being appropriate in environmental terms.

This will help to ensure the allocation sites will be developed in the most efficient, effective and environmentally acceptable way to help meet the District's requirements and to minimise its reliance on neighbouring authorities.

The Policy as drafted does allow flexibility in the type of employment uses that may be appropriate on the allocation sites, which does accord with national guidance. However, in view of the assessments that have been undertaken and the constraints within the District, the acceptance of other employment uses should not be at the expense of Class B uses, especially at the outset of the new Local Plan period.

The inclusion of the New Monks Farm site within the Built Up Development Boundary and inclusion of wording in Policy 4 and its supporting text to allow for a range of employment uses on this site outside of use Class B1 to B8 could especially mean that other uses will come forward and that the Site will not contribute at all or in any meaningful way towards meeting the need for additional Class B uses. **This would serve only to exacerbate the District's shortfall in its supply of new floorspace for Class B uses.**

New Policy 28 which deals with Retail Development directs new retail floorspace to the District's existing town centres. This follows from national planning guidance and the Council's Retail Study, which was submitted in evidence to the new Local Plan and which identifies capacity within the town centres to accommodate some of the new retail space. The town centres must be the first priority for new retail provision.

In order to ensure Policy 4 is based upon a positively prepared evidence base, that it will be effective in meeting the assessed Class B use employment requirements of the District and not undermine the national led priorities for directing retail floorspace to the town centres, the Policy must be further modified to require the minimum floorspace requirements to refer to Class B1 to B8 floorspace only. This would not preclude other appropriate employment uses from being provided so long as the assessed Class B requirements have been met or following a further interim employment assessment which may be undertaken and which concludes that the amount of Class B space can be reduced and other employment uses permitted.

Policy 4 and its supporting text as currently drafted, also rely on the site specific policies to set out on what basis employment (and other) development will be considered to be 'appropriate'. Given the nature of the allocation sites and, in the case of New Monks Farm and Shoreham Airport their close proximity to each other, Policy 4 should also specify that appropriate development will be appraised against the full range of environmental constraints and cumulative impacts.

**5. Please explain in the box below what change(s) you consider necessary to make the Main Modification(s) to the Adur Local Plan legally compliant and sound having regard to the reason you identified above.**

**(You will need to say why this change will make it legally compliant or sound. It will be helpful if you are able to put forward your suggested or revised wording. Please be as precise as possible).**

To reflect the findings of the Council's Objectively Assessed Requirement for Class B1 to B8 floorspace and the District's lack of capacity to accommodate its entire minimum requirement, Policy 4 must be amended further as follows.

The blue text denotes the additional text required to ensure the Policy has been positively prepared, justified and will be effective and compliant with National Planning Policy (NPPF para 20 – meeting the needs of business, para 158 ensuring the Local Plan is based on adequate and relevant evidence about the economic prospects of the area).

**Policy 4**

To facilitate regeneration and ensure a sustainable economy, a total ~~minimum of~~ ~~approximately~~ 41,000 square metres of land will be allocated for appropriate [Use Class B1, B2, B8](#) employment generating uses in Adur up to 2034-2 at the following locations:

- Shoreham Airport (~~approximately~~ [a minimum of](#) 15,000 sqm)
- New Monks Farm (~~approximately~~ [a minimum of](#) 10,000sqm sq.m.)
- Shoreham Harbour Regeneration Area (~~approximately~~ [a minimum of](#) 16,000 sqm within Adur)

These allocations will provide a range of employment sites in terms of locations and sizes, and provision will be made within these allocations for a range of accommodation types.

[Other employment generating uses may also be permitted on these sites subject to the above minimum requirements having been met or following an interim review of local employment assessment which determines this requirement should be reduced.](#)

[Employment uses will only be permitted on these sites if they are determined to be appropriate based on environmental appraisals that take into full consideration the character and the setting of the sites and all relevant cumulative impacts arising from other neighbouring and nearby development.](#)

Further economic development at the site to the north of the airport, currently occupied by Ricardo, will be supported subject to other policies in this Plan.

In addition to the above provision, additional employment floorspace will also be achieved through redevelopment, intensification, [and](#) change of use to employment, ~~and provision of new employment sites.~~

Outside of designated employment areas, where new development for, or extensions to B1, B2 and B8 uses is proposed, such applications will only be permitted where it is demonstrated they will not have an unacceptable impact on adjacent residential properties and they comply with other policies in this Plan.

Criteria for the identification and provision of new employment floorspace will include the need to provide a variety of new business premises including small and medium sized premises, the need to meet the modern needs of businesses in terms of floorspace, security, quality of environment, good access and services, and ensuring there are no conflicts with neighbouring uses.

Continue on separate sheet if necessary)

6. **Please add any comments in relation to the Addendum to the Sustainability Appraisal of the Adur Local Plan in the box below.**