

## 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.

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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	<input type="text" value="Lucy"/>		
Last name	<input type="text" value="Howard"/>		
Organisation (where applicable)	<input type="text" value="South Downs National Park Authority"/>		
Address line 1	<input type="text" value="South Downs Centre"/>		
Address line 2	<input type="text" value="North Street"/>		
Address line 3	<input type="text" value="Midhurst"/>		
Post Code	<input type="text" value="GU29 9DH"/>	Telephone	<input type="text" value="████████"/>
Email address	<input type="text" value="planningpolicy@southdowns.gov.uk"/>		

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

First name	<input type="text"/>
Last name	<input type="text"/>
Organisation	<input type="text"/>
Job Title	<input type="text"/>

Address line 1

Address line 2

Address line 3

Post Code  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:

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:**

**It is proposed to amend Policy SD22 to make it consistent with the Written Ministerial Statement (28.11.14). However the judgement handed down from the Court of Appeal relating to this matter (SSCLG v Reading & West Berkshire, dated 11/05/16) indicated that the WMS should not be applied in a blanket fashion, and that local circumstances weighing against the WMS are material.**

**It is respectfully suggested that the strength of local evidence pointing to a lower threshold for seeking affordable housing in Adur than set out in the WMS, outweighs the WMS and Planning Practice Guidance. The amendments proposed to Policy 22 are not justified taking account of the evidence, and would be ineffective in terms of boosting housing supply, including for specialist housing needs, as required by the NPPF.**

**The South Downs National Park Authority has a particular interest as part of the Coastal Sussex HMA falls within the National Park. The National Park Authority also faces similar issues with respect to a reliance on smaller development sites to meet affordable housing development needs.**

**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).**

**Retain the existing wording to Policy 22 and retain paragraph 4.44.**

(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.**

