

Submission Adur Local Plan Main Modifications Representation Form

Return Address: 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. 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	<input type="text" value="Laura"/>		
Last name	<input type="text" value="Brook"/>		
Organisation (where applicable)	<input type="text" value="Sussex Wildlife Trust"/>		
Address line 1	<input type="text" value="Woods Mill"/>		
Address line 2	<input type="text" value="Shoreham Road"/>		
Address line 3	<input type="text" value="Henfield"/>		
Post Code	<input type="text" value="BN5 9SD"/>	Telephone	<input type="text" value=""/>
Email address	<input type="text" value="swtconservation@sussexwt.org.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	<input type="text"/>		
Address line 2	<input type="text"/>		
Address line 3	<input type="text"/>		
Post Code	<input type="text"/>	Telephone	<input type="text"/>
Email address	<input type="text"/>		

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:

The Sussex Wildlife Trust are concerned that the shift in language adopted in the policy has not been considered in relation to the impact on the District's biodiversity/environmental resources.

With the policy now stating that a minimum of 600 houses and a minimum of 10,000 sqm of appropriate employment generating space will be delivered, the policy allows an unknown quantity of development. This is reflected in many of the main modifications made within the plan.

We recognise that the Sustainability Appraisal Addendum tries to allay concerns saying that applications will be subject to other policy requirements. However, the Sussex Wildlife Trust is concerned about the robustness of the policies that are intended to protect these allocations with open ended development quantities.

For example, NPPF section 109 is clear that development should look to deliver a net gain for biodiversity, this is not currently reflected in the text of the Biodiversity Policy (32) of the Adur Local Plan. We did raise our concerns in our submission to the inspector prior to the examination in public, but the opportunity to discuss this at the examination was removed. We are therefore concerned that the biodiversity policy as it stands is not robust enough to respond to the demands that will be put on these sites with such open housing numbers and employment space.

The NPPF clearly states the need for development to deliver a net gain for biodiversity where possible and not simply minimise impact. Without this adequately reflected in policy, we are concerned that this will leave the natural capital of the District open to exploitation.

Please also see our response letter concerning the shift in the delivery

capacity of the plan.

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).

We would prefer to see the term a 'minimum' removed from the policy and replaced with term 'upper limit of'

If the council /inspector are minded to accept the main modifications as they stand, we would ask the council to ensure that a robust biodiversity policy is in place to ensure development delivers a net gain for biodiversity in the District. This would ensure they can continue to deliver towards vision 7 and objective 6 of the Adur Local Plan

This could be achieved by modifications to the biodiversity policy by incorporating the term 'net gain'

The policy currently says:

All development should ensure the protection, conservation and where possible enhancement of biodiversity.....

We suggest that it be amended to:

*All development should ensure protection, conservation, enhancement and where possible **net gains** to biodiversity.*

(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.

Section 7.2 of the Addendum to the Sustainability Appraisal does say that *the addition of a minimum requirement does not necessarily mean a blank cheque, allowing for unconstrained development but instead a mechanism to allow for greater floorspace quantum where this can be delivered appropriately in accordance with policies in the Local Plan.*

The reliance on policy is reflected in section 7.4 of the Addendum SA which states in section 7.4 that main modification, MM8 proposes changing the housing provision to a minimum amount. The paragraph goes on to reflected that this could potentially allow for an increase level of housing within this allocation

Section 7.4 of the SA addendum goes on to say that any increase in housing numbers would still be subject to other policy requirements including the need to minimise impact on landscape, ecology, drainage etc. We take this opportunity to highlight the National Planning Policy Framework (NPPF) clearly states the need for development to deliver a net gain for biodiversity not simply minimise impact.

The Sussex Wildlife Trust is concerned that the need for a net gain in biodiversity is not reflected in the text of the Biodiversity Policy (32) in the Adur Local Plan. We did raise our concerns in our submission to the inspector prior to the examination in public but the opportunities to discuss these at the examination were removed. We are therefore concerned that the biodiversity policy as it stands may not be robust enough to respond to the demands that will be put on these sites with such open housing numbers and employment space.