

Adur Local Plan

Key Issues

Consultation Statement

October 2025

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1. Introduction

Purpose of this report

- 1.1. This report is a Consultation Statement that sets out the engagement process and outcome of the Adur local plan Key Issues consultation which took place between 26 November 2024 to 5 January 2025. It sets out who was invited to make representations, the methods of engagement and a summary of the main issues raised, therefore meeting the requirements of Regulation 22(1c)(i-iii) of the Town & Country Planning (local planning) (England) Regulations 2012.
- 1.2. A further Consultation Statement, which will include the regulatory requirement to set out how the representations have been taken into account, will be published alongside a draft Adur local plan. The timetable for this will be dependent on the implementation of national changes to local plan making.

Compliance with the Statement of Community Involvement

- 1.3. Adur District Council and Worthing Borough Council adopted a [Joint Statement of Community Involvement](#) in April 2024. This sets out how the councils will engage with residents, local groups, stakeholders and statutory consultees in preparing planning policy documents.

A new Adur local plan

- 1.4. Since the consultation exercise was carried out, the council has made the decision to progress the preparation of a new local plan under the new national planning system, introduced by the Levelling Up and Regeneration Act 2023. At the time of publication of this document, the government has not yet published the regulations for this new system. It is expected that these will be implemented in 2026.
- 1.5. The government has also committed to producing national development management policies. These are intended to provide national consistency on key planning issues, simplify the planning system by reducing duplication, and speed up decision-making by providing a standardized baseline for development standards, such as on housing, economic growth, and environmental matters. This will mean that local plans focus on specifically local matters. These have not yet been produced. Certain issues raised during the consultation may fall within the scope of these national policies.
- 1.6. Adur District Council has started work on preparing a new Adur local plan, which will provide a long-term vision for the area over a period of 15 years. The new plan will provide the strategy for the growth of the local plan area, setting out what development will take place and where. It will set out a vision for the area that helps to establish the long-term aims and aspirations. The vision will be turned into objectives and policies which will deal with issues such as housing, the economy, the environment and infrastructure.
- 1.7. Once adopted, the new plan will replace the existing Adur local plan which was adopted in 2017 and will be an important consideration in deciding planning applications. It is

anticipated that the new Adur local plan will be adopted by the successor authority after [local government reorganisation](#) in Sussex.

Key Issues consultation

- 1.8. The council sought views and suggestions on how Adur should grow and develop in the future. The [Adur local plan Key Issues](#) consultation document identified the issues and challenges facing the local plan area:
- Housing
 - Population and communities
 - Health
 - Climate change
 - Air
 - Biodiversity
 - Landscape
 - Soils
 - Water
 - Cultural heritage
 - Economy
 - Any other issues
- 1.9. The Adur local plan will cover the part of Adur district outside the South Downs National Park. Unlike many other local planning authority areas which cover wide areas there are only a limited number of development options. We asked for views on how best to balance the delivery of growth and regeneration across the local plan area to meet future needs whilst at the same time protecting the things we value about the area.
- 1.10. At this stage the council was not consulting on any new policies or allocating any sites for development.

Sustainability appraisal

- 1.11. Under the current planning system, the council must carry out Sustainability Appraisals (SA), incorporating Strategic Environmental Assessment (SEA) requirements, for each Development Plan. Scoping is the first stage of the SA process. The purpose of the Scoping Report is to identify the scope and level of detail of the information to be included in the SA report.
- 1.12. Consultation on the [Scoping Report](#) was undertaken with the statutory consultation bodies which took place from 18th November to 23rd December 2024. A [Consultation Summary](#) sets out the responses to this consultation.

2. Methods of engagement

- 2.1. This section of the report sets out who was invited to make representations and how the consultation was publicised and responses collected.

Availability of consultation documents

- 2.2. The Key Issues Consultation document was made available on a dedicated page on the council's website.
- 2.3. Hard copies of the documents were made available at the following locations:
- Lancing Library
 - Shoreham Centre
 - Shoreham Library
 - Southwick Library

Email notification

- 2.4. The council maintains a database of consultees interested in planning policy matters. The database includes specific and general consultees as well as individuals and organisations. Consultees can subscribe or unsubscribe to the database at any time. At the time of the consultation there were 425 consultees.
- 2.5. At the start of consultation, an email notification was sent to all consultees registered on the database. The email included full details of where the documents could be viewed, including a link to the council's website and consultation platform, dates of the consultation period, and how to respond.

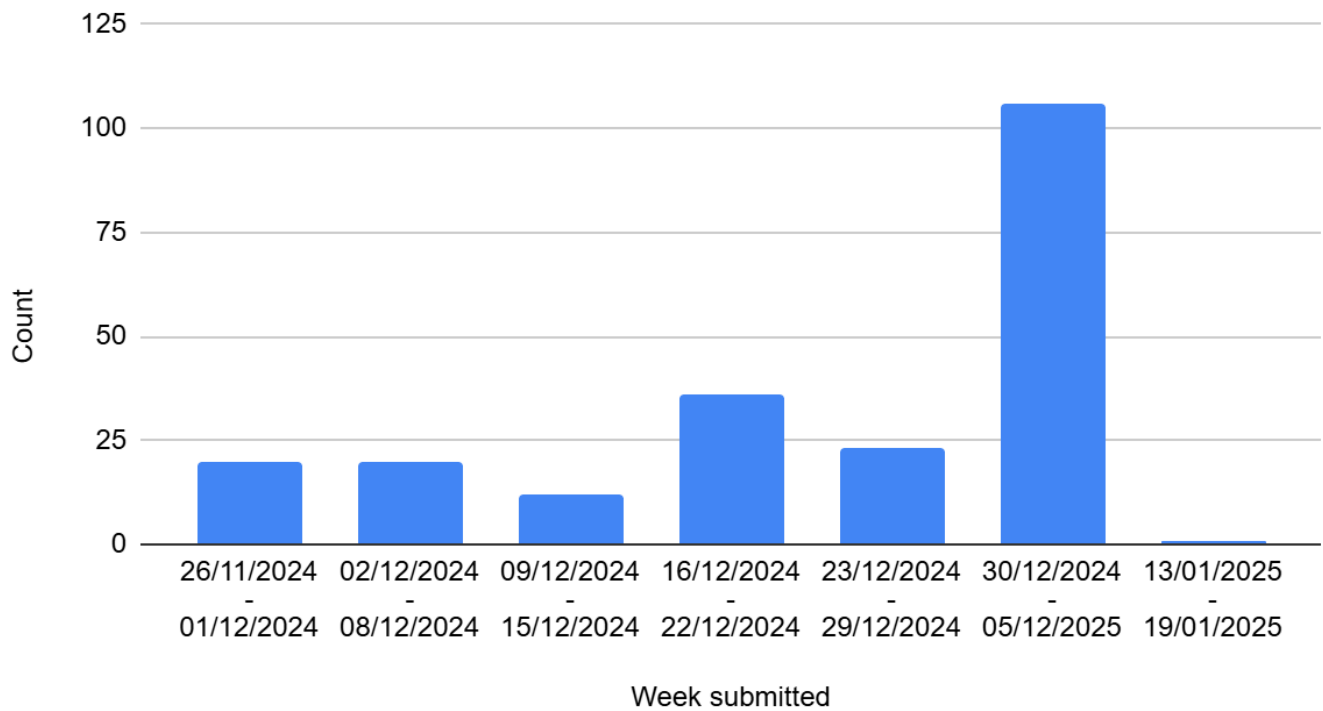
Media and communications

- 2.6. A press release was issued on 26 November 2024. This was picked up by a number of local media outlets. The consultation was also announced on the council's social media platforms.

How we collected responses

- 2.7. An online survey was produced to collect responses. For each of the identified topics respondents were asked to rank how important they felt these issues are for the Adur local plan area, and if there are any other issues related to that topic that have not been identified. The final question asked respondents for any other issues. 218 responses were submitted via the online survey. The table below shows the timing of submissions.

Week Google Form submitted

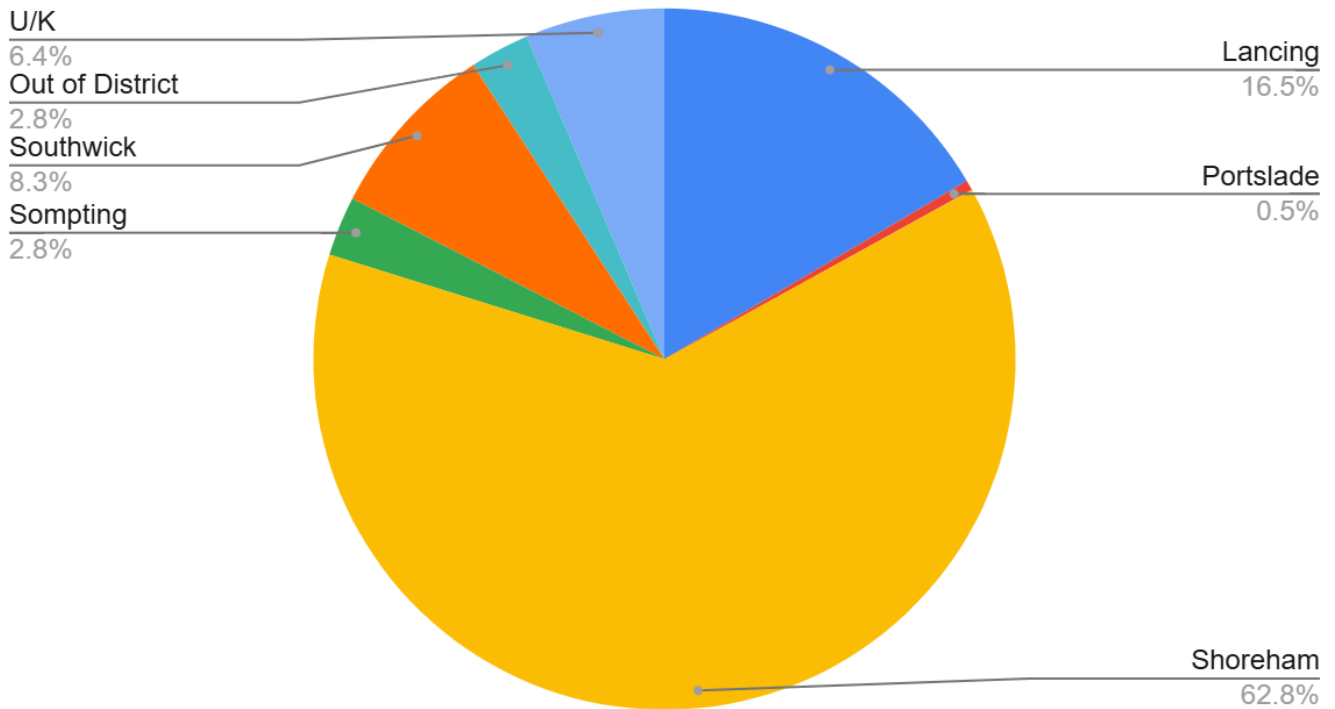


- 2.8. Respondents could also submit written responses. 27 responses were submitted via email. These responses were primarily from organisations rather than individuals.

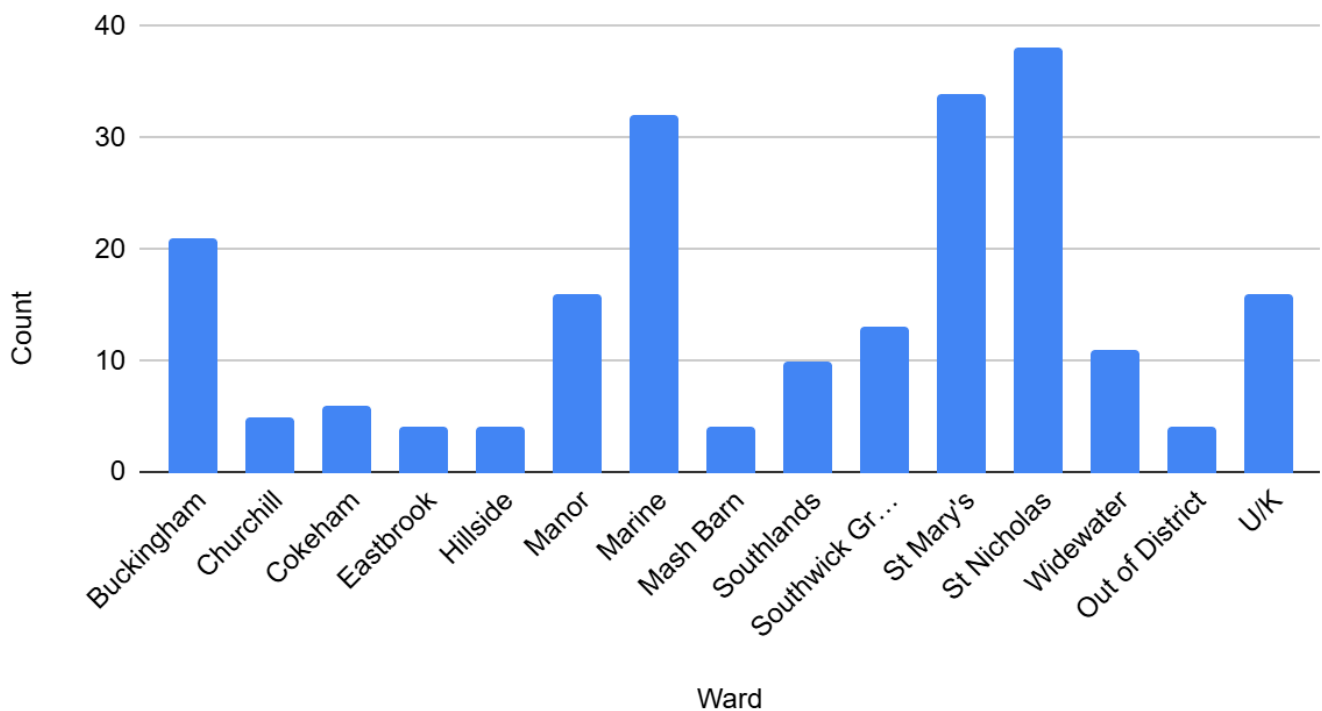
3. Profile of respondents

- 3.1. The charts below illustrate the location of respondents. More than 60% of respondents are residents of Shoreham-by-Sea. In particular Marine, St Mary's and St Nicolas wards made up a significant proportion of representations.

Number of responses by Town



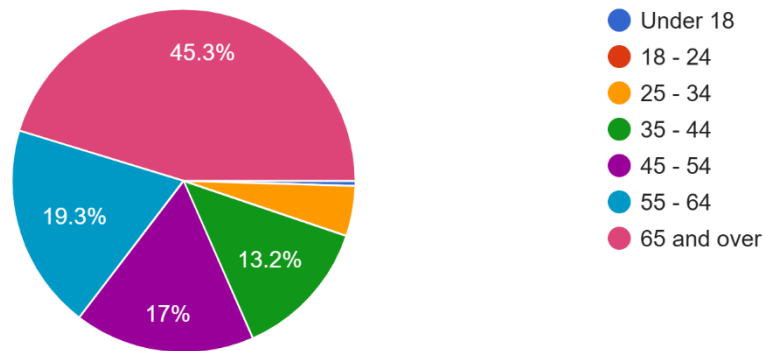
Number of responses by Ward



Almost half of respondents were aged 65 and over. Less than five percent were under 25.

Age

212 responses



3.2. The council received representations from the following organisations:

Statutory Bodies

- Environment Agency
- Historic England
- Lancing Parish Council
- Sompting Parish Council
- Brighton & Hove City Council
- Southern Water
- Gatwick Airport
- South Downs National Park Authority
- NHS Property
- National Highways
- Natural England
- Arun District Council

General Bodies

- British Horse Society
- Sussex Wildlife Trust
- Adur Collective Community Land Trust
- Sport England
- Adur & Worthing Business Partnership
- Shoreham-By-Cycle
- Ricardo plc
- Waterfront Residents' and Tenants' Association
- North Lancing Action Group
- Shoreham District Ornithological Society

Planning Consultants / Agents

- Hargreaves

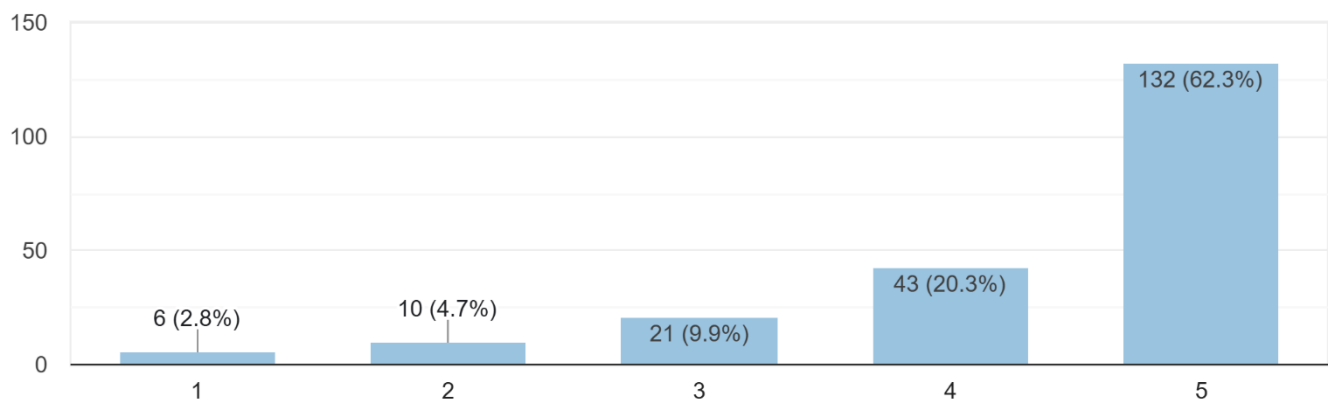
4. Summary of responses

Housing

- 4.1. On a scale of 1 (not at all) to 5 (very important) 82.6% of respondents indicated that housing was an important issue for the local plan with 62.3% feeling that housing was a very important issue for the Adur local plan.

How important do you feel these issues are for the Adur Local Plan area?

212 responses



- 4.2. 152 representations provided further comment on this topic. Representations relevant to this theme that were not submitted using the consultation form have also been analysed. The main issues raised are set out below:

Infrastructure:

Many representations expressed concerns over the perceived lack of adequate infrastructure (roads, traffic, parking, medical facilities, schools, sewage, and water supply) to support existing and future housing developments. Many responses stated that infrastructure development should precede, not follow, housing investment.

Response:

The council acknowledges concerns regarding infrastructure provision. An updated Infrastructure Delivery Plan (IDP) will accompany the local plan and will identify the transport, education, health, utilities and community facilities required to support planned growth. This work is being undertaken in partnership with infrastructure providers, including West Sussex County Council, the NHS, National Highways and utility companies, to ensure requirements are identified and planned for.

Infrastructure delivery will be secured through planning obligations - Section 106 agreements and Section 273 agreements for highways (as the council does not currently operate a Community Infrastructure Levy). It should be noted that Section 106 contributions can only be used to mitigate the impacts of new development, and cannot

be used to remedy existing infrastructure issues.

Infrastructure planning is informed by evidence-based studies, such as transport modelling and assessments of education and health capacity and liaison with the relevant infrastructure providers. Development will be phased and required to provide infrastructure in step with growth, to ensure that the needs of existing and future residents are met.

Housing Type & Affordability:

Many representations indicated concerns over the affordability of homes. Comments highlighted the need for more social rented housing rather than shared ownership, and for truly affordable homes for local people, first-time buyers, and older people and disabled people. Comments expressed support for a mix of housing types beyond just flats, including houses with outdoor space. Several representations expressed support for community led housing development. Comments expressed opposition to luxury flats, second homes, and Airbnbs.

Response:

Many comments referred to the need to address the special accommodation needs of different groups including older people, those with disabilities (the need for Lifetime Homes), 'extracare'; and the need for different types of homes in terms of houses and flats of different sizes. In addition, respondents have raised the issue of affordability of homes, the need to make provision for first time buyers, and the need to ensure delivery of a range of housing tenures to meet differing affordability. To address these matters the Council has commissioned a Strategic Housing Market Assessment (SHMA) which will provide an evidence base on these housing needs and 'mix', to inform emerging planning policy.

The planning system cannot directly control the price of general market homes. However, the plan will need to address how a range of housing tenures can be delivered to address the needs identified in the SHMA (see above).

In addition, the increased costs involved for development itself has also been raised. A 'Whole Plan Viability' Assessment will also be carried out as part of the local plan process. This will evaluate whether the policies in a plan (including proposed affordable housing requirements and contributions towards infrastructure) are, when considered together, realistically achievable. It therefore ensures that the cumulative impact of the local plan does not hinder delivery of the Plan's objectives, particularly regarding housing and infrastructure.

Several responses raised the issue of community-led development. The local plan will consider how best to support community-led housing developments, taking into account the specific characteristics of Adur.

The NPPF requires that local authorities plan for the accommodation needs of Gypsies and Travellers. Adur District Council, together with Worthing Borough Council, the South

Downs National Park Authority and Brighton & Hove City Council commissioned a study looking at needs within these areas, which has been published on the Councils' website: <https://www.adur-worthing.gov.uk/planning-policy/joint-aw/adur-and-worthing-background-studies-and-info/gypsies-and-travellers/#gtaa-2024>

The previous Government proposed creating a specific use class to help local planning authorities address Airbnbs and similar accommodation - however that has not been implemented. It appears there is not a significant issue of second homes in the Adur area compared to some parts of the country, where 'principal residence' policies have been introduced. However, further work will be undertaken to try to clarify the scale of second home ownership. If evidence indicates that there is a significant issue of second homes causing adverse impacts, this can be reviewed.

Overdevelopment & Green Space:

Many respondents feel the area is already overdeveloped, particularly Shoreham-by-Sea, with new buildings being unattractive and out of keeping with the town. There is a strong desire to protect and increase green spaces, improve biodiversity, and prioritize brownfield sites over greenfield.

Response:

The council notes concerns regarding the scale and character of development and the importance of protecting green spaces. National planning policy requires the council to meet identified housing and employment needs as far as possible, but also emphasises the efficient use of land, the protection and enhancement of the natural environment, and the prioritisation of brownfield sites where suitable.

The local plan will need to consider a range of sites for development; this will include the redevelopment of existing available sites (residential, employment, or other uses). However, due to the high level of need in the area, as well as the limited size of Adur, there is insufficient brownfield land to meet needs. As such it will be necessary to consider whether any available greenfield sites are suitable and available for development. In addition, it will be important to ensure that efficient use is made of all sites; as such the approach to density will be reviewed through the local plan process. Similarly, a range of site sizes will be considered through the local plan; given the identified housing need and limited sites it is important that all opportunities are carefully assessed.

Higher densities have been developed on the Western Harbour Arm in this area to ensure efficient use of brownfield land, contribute towards housing needs (in line with national planning policy) and to ensure viability. Densities of the remaining undeveloped sites in the Western Harbour Arm will be considered through the emerging local plan.

Design quality & Aesthetics:

Some representations expressed concerns about the quality and aesthetic appearance of new developments, with a desire for better design that integrates with the local area, is sustainable, and built to last.

The current Adur local plan 2017 requires that development enhances the local environment by way of its character and appearance and sets out criteria relating to the quality of the built environment and public realm, and sets out a range of issues related to design and appearance. This approach will be broadly maintained, but the opportunity will be taken to consider whether any specific areas would benefit from additional design guidance.

Decision making and communications:

Several responses express frustration with the council's planning decisions, perceived lack of communication, and an inability to hold developers accountable for quality and timely completion of projects.

The Council acknowledges concerns regarding communication, decision-making and the delivery of development. The planning process is governed by national legislation and guidance, and all applications are determined in accordance with the statutory planning framework. Through planning conditions and Section 106 agreements, the Council seeks to ensure that development is delivered to an appropriate quality and that necessary infrastructure and mitigation are secured.

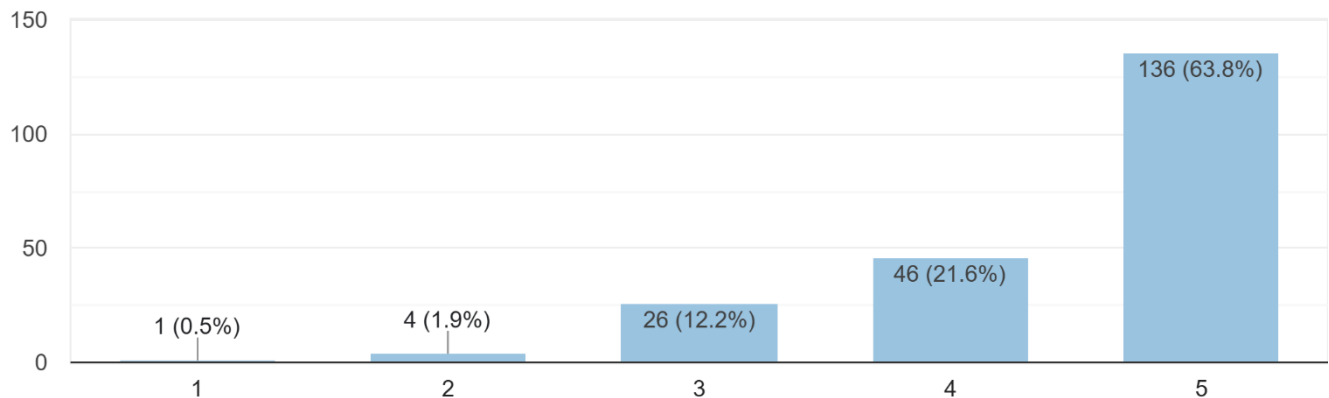
While the Council does not have powers to control all aspects of build-out or site management, it continues to work with developers, statutory agencies and the community to support timely and high-quality delivery. The Council's approach to engagement is set out in its [Statement of Community Involvement \(SCI\)](#), which explains how residents and stakeholders can participate in the planning process. The Council will continue to review and improve communication and engagement in line with this.

Population and communities

- 4.3. On a scale of 1 (not at all) to 5 (very important) 85.4% of respondents indicated that population and communities are important issues for the local plan with 63.8% of respondents indicated that they considered that population and communities were very important issues for the Adur local plan.

How important do you feel these issues are for the Adur Local Plan area?

213 responses



- 4.4. 105 representations provided further comment on this topic. Representations relevant to this theme that were not submitted using the consultation form have also been analysed. The main issues raised are set out below:

Infrastructure:

A significant concern is the pressure on existing infrastructure, including school places, doctors, dentists, roads, and public transport, with many responses highlighting current inadequacy and the inability to cope with more development.

Response:

Infrastructure is addressed generally under the Housing theme.

Many comments referred to the need to address sufficient primary, secondary and SEND school provision. To ensure that the Adur local plan can be supported by necessary infrastructure provision including education, the Council will prepare an Infrastructure Delivery Plan (IDP) which will identify infrastructure requirements including education, across the local plan area. The IDP will help to co-ordinate the partnerships required to deliver infrastructure improvements in a timely manner to support development. The Council will consult with West Sussex County Council Education as part of preparing its Infrastructure Delivery Plan.

Green Spaces:

There is a strong desire for more green spaces, including parks, community gardens, and natural areas, with an emphasis on their importance for health, wellbeing, biodiversity, and recreational use.

Response:

This is addressed under the Health theme.

Community Facilities:

Responses frequently mention the need for accessible and affordable community spaces for all age groups, including youth clubs, social hubs, and sports facilities, with a focus on purposeful location and proper maintenance.

Response:

Other comments were received regarding the need for safe community facilities and spaces for all ages. The current local plan includes a policy to protect existing community facilities from being lost to an alternative use unless it can be demonstrated it is no longer needed or a replacement will be provided. It is intended to include a similar policy in the new Plan unless addressed by National Development Management Policies.

Housing:

Several responses address housing concerns, advocating for more affordable housing, fewer flats and more houses, and better provision for first-time buyers and social housing.

Response:

This is addressed under the Housing theme.

Environmental Quality:

There is a concern about maintaining biodiversity and protecting nature, with a call for new developments to make provision for well-planted open spaces and to address issues like litter and over-tourism on natural ecosystems.

Response:

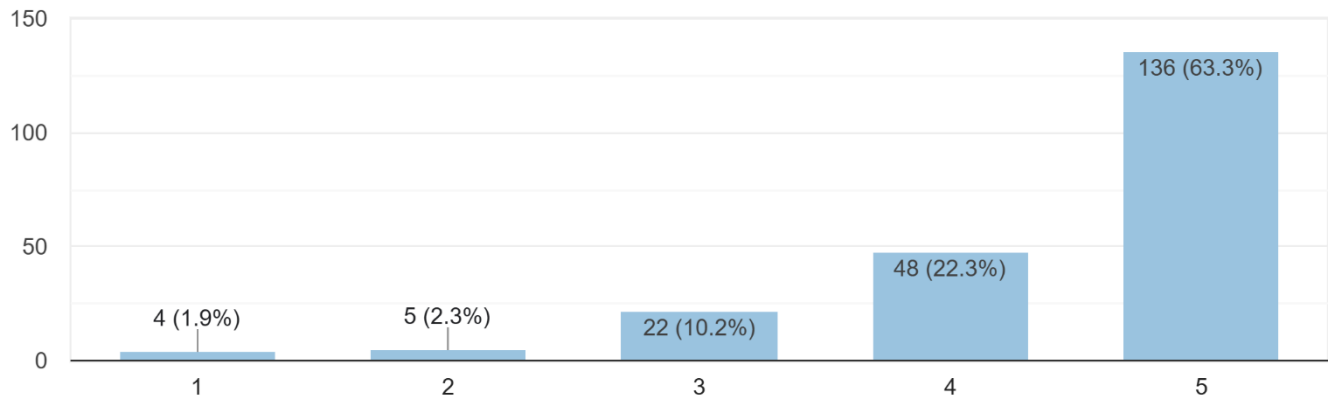
This is addressed under the Biodiversity theme.

Health

- 4.5. On a scale of 1 (not at all) to 5 (very important) 85.6% of respondents indicated that health is an important issue for the local plan with 63.3% of respondents indicated that they considered that health was a very important issue for the Adur local plan.

How important do you feel these issues are for the Adur Local Plan area?

215 responses



- 4.6. 112 representations provided further comment on this topic. Representations relevant to this theme that were not submitted using the consultation form have also been analysed. The main issues raised were:

Infrastructure:

A significant number of responses pointed out the strain on existing public services, such as doctor's appointments, dentists, and school places, due to increased population and new housing developments. The need for commensurate health and wellbeing facilities with increased housing was a recurring theme.

Response:

Infrastructure is addressed generally under the Housing theme.

Many comments referred to the need to provide improved healthcare infrastructure. To ensure that the Adur local plan can be supported by necessary infrastructure provision including health, the Council will prepare an Infrastructure Delivery Plan (IDP) which will identify infrastructure requirements including across the local plan area. The IDP will help to co-ordinate the partnerships required to deliver infrastructure improvements in a timely manner to support development. The Council will consult with the NHS and Clinical Commissioning Groups as part of preparing its Infrastructure Delivery Plan.

Green Spaces and Environment:

Many responses highlighted the importance of preserving, increasing, and maintaining green spaces, parks, and allotments. Concerns were raised about overdevelopment impacting existing green areas, and suggestions included planting fruit trees, creating community gardens, and ensuring new developments include green infrastructure. The

cleanliness of the sea and river Adur, along with flood prevention, were also mentioned as environmental concerns.

Response:

Many respondents have raised the issue regarding the need to protect green spaces and for development to provide open space and play areas as well as areas for food growing and allotments. The adopted Adur local plan contains a policy on Open Space. It is intended to include a similar policy in the new Plan (unless addressed by National Development Management Policies) which will set standards for the provision of open space types within new development or financial contributions. The policy will also safeguard existing open spaces unless it can be demonstrated that the space is surplus to requirements or it is being replaced by equivalent or improved provision. Similarly, comments have been raised concerning the desire to protect indoor and outdoor sports facilities.

Active Travel and Infrastructure:

Numerous respondents emphasized the need for improved active travel routes, particularly safe cycle lanes and well-maintained pavements. Specific concerns included the lack of cycle lanes in Shoreham, poor signposting, and the hazardous use of pavements by cyclists and e-scooters. There were also calls for better integration of active travel infrastructure with new housing developments and efforts to reduce car dependency.

Response:

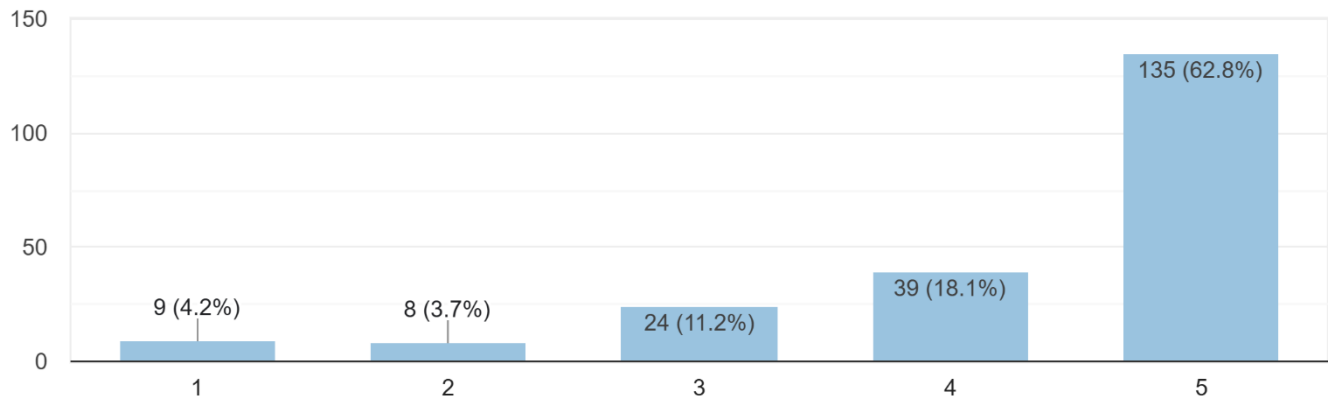
The provision of safe active travel routes was another key theme that was raised during consultation. The Council supports the aims to encourage the use of sustainable transport alternatives to the car that are established within the [West Sussex Transport Plan](#) and [West Sussex Walking and Cycling Strategy](#). The Adur local plan contains a policy on transport and connectivity. It is indeed for the new local plan to include a similar policy that will address active travel (unless addressed by National Development Management Policies).

Climate change

- 4.7. On a scale of 1 (4.2%) to 5 (very important) 62.8% of respondents indicated that they considered that Climate Change was a very important issue for the Adur local plan.

How important do you feel these issues are for the Adur Local Plan area?

215 responses



- 4.8. 95 representations provided further comment on this topic. Representations relevant to this theme that were not submitted using the consultation form have also been analysed. The main issues raised were:

Flood Risk & Development:

Many responses highlighted the critical issue of building on areas at risk of flooding, citing past developments like New Monks Farm and the airport field as problematic. There is strong opposition to future construction in high-risk flood areas and a call for better flood defences, natural flood solutions, and holding Southern Water accountable for drainage.

Response:

The Council recognises the importance of avoiding inappropriate development in areas of flood risk. The local plan will be supported by a Strategic Flood Risk Assessment (SFRA) and a Sequential and Exception Test, in line with national policy, to ensure that development is directed away from areas at highest risk wherever possible. Where development is necessary in lower-risk areas, it will be required to incorporate flood mitigation measures and sustainable drainage systems (SuDS).

The Council works with the Environment Agency and Southern Water on flooding and drainage issues. However, the operation and maintenance of drainage infrastructure is outside the scope of the local plan and is the responsibility of the relevant statutory undertakers.

Infrastructure & Environment:

Concerns were raised about insufficient infrastructure (traffic, roads, doctors, schools, parking) to support new housing, along with increasing pollution, loss of natural

drainage, and the need for eco-friendly solutions like solar panels, heat pumps, and increased green spaces.

Response:

Concerns about infrastructure capacity and environmental impacts are noted. An updated Infrastructure Delivery Plan (IDP) will set out the requirements for transport, education, health, utilities and green infrastructure to support new development. Infrastructure delivery will be secured through Section 106 planning obligations.

The local plan will promote measures to minimise environmental impacts and encourage sustainable design and construction. Operational matters such as the detailed delivery of health services, road maintenance and parking enforcement are outside the scope of the local plan but will continue to be discussed with partners.

Specific Locations:

Several responses specifically mentioned concerns about flooding and development in areas like Shoreham along the River Adur, near the airport, and the land in North Lancing.

Response:

Concerns regarding development in sensitive locations are acknowledged. Site options will be assessed through the local plan process using evidence on flood risk, transport, landscape, ecology and infrastructure capacity. Sites will only be considered appropriate for allocation if they can be demonstrated to be deliverable, sustainable and in accordance with planning policy.

Climate Change Perspective:

While some acknowledged climate change as a major threat requiring adaptation and mitigation, a few questioned its human-driven nature, suggesting focus should be on general environmental cleaning.

Response:

The Council recognises climate change as a significant long-term challenge requiring adaptation and mitigation through planning policy. National planning guidance requires local authorities to plan for climate resilience and reduced carbon emissions. The local plan will therefore include policies on sustainable development, renewable energy, green infrastructure and biodiversity net gain (BNG) unless these matters are addressed in national development management policies.

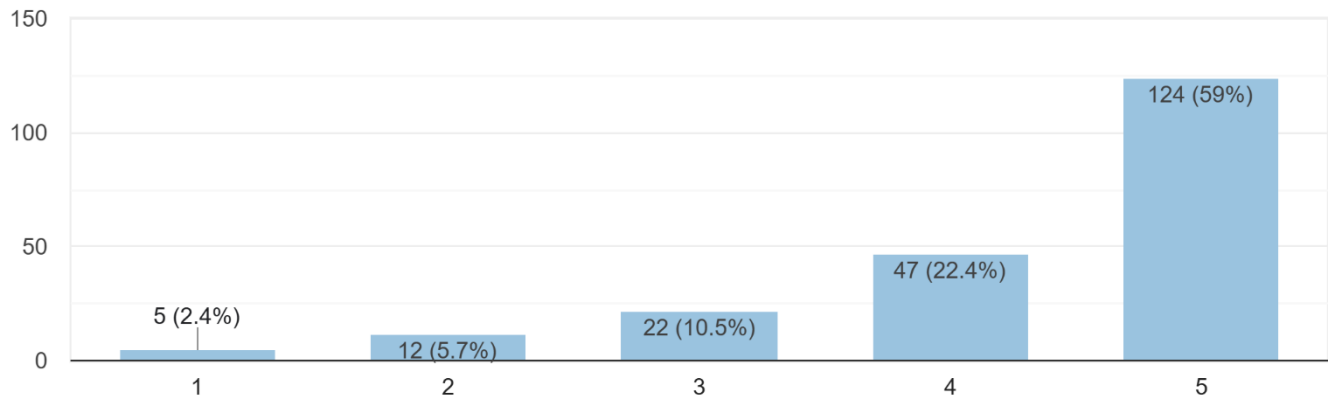
The scientific causes of climate change are not a matter for the local plan, which must respond to national planning policy requirements.

Air

- 4.9. On a scale of 1 (not at all) to 5 (very important) 81.4% of respondents indicated that air is an important issue for the Adur local plan with 59% feeling that air is a very important issue for the Adur local plan.

How important do you feel these issues are for the Adur Local Plan area?

210 responses



- 4.10. 96 representations provided further comment on this topic. Representations relevant to this theme that were not submitted using the consultation form have also been analysed. The main issues raised were:

Public Transport:

There is a significant need for improved public transport, especially bus services, with calls for increased frequency, reliability, and affordability. Specific suggestions include protecting the 700 bus service, improving bus routes in underserved areas like north Lancing and Shoreham Beach, and considering express services. Many feel public transport improvements should precede private vehicle access curtailment.

Response:

The Council acknowledges the importance of improving public transport provision. It will continue to work with West Sussex County Council, bus operators and other partners to support improved coverage, frequency, reliability and affordability of services. The local plan can encourage sustainable transport and ensure new development is well connected.

However, the operation of bus services, including timetables, fares and specific route decisions, is outside the scope of the local plan and responsibility rests with transport providers.

Traffic Congestion and Air Quality:

Road congestion is a major concern, particularly on the A259 through Shoreham and the High Street, leading to poor air quality. Suggestions include pedestrianising parts of town, diverting traffic from the town centre, assessing road networks for one-way streets,

restricting lorries, and coordinating roadworks better.

Response:

Concerns about congestion and air quality, particularly along the A259 corridor and Shoreham High Street, are noted. The local plan will be informed by transport modelling and an updated Air Quality Action Plan. Measures such as traffic management, encouraging sustainable transport, and promoting active travel will form part of the strategy.

However, day-to-day traffic management, roadworks coordination and enforcement are not within the scope of the local plan, but fall to West Sussex County Council and other relevant agencies.

Cycling and Walking Infrastructure:

There is a desire for improved and safer cycling and walking routes, including segregated cycle paths (e.g. on Upper Shoreham Road and along the River Adur), better connections to amenities, and public education on cycling. Concerns about safety due to congested roads were also raised.

Response:

The Council supports the delivery of safe and accessible walking and cycling routes to reduce reliance on private cars and improve health outcomes. Opportunities to extend and improve networks, including segregated cycle paths and riverside routes, will be explored in partnership with West Sussex County Council and other stakeholders.

Implementation of specific schemes is outside the scope of the local plan, but the Plan will provide a supportive policy framework.

Impact of New Developments:

Many respondents believe that new housing developments contribute significantly to increased traffic, congestion, and air pollution, with existing infrastructure unable to cope. There are calls for better planning to ensure developments have adequate supporting infrastructure, including public transport and green spaces, and for retrospective assessments of recent developments.

Response:

The Council notes concerns that new developments can contribute to pressures on infrastructure, traffic and air quality. The local plan is supported by evidence on transport, health, education, flood risk and utilities, to ensure that development is properly planned and supported. Developers will be required to mitigate impacts through design, infrastructure contributions and green infrastructure provision.

Parking:

Parking is highlighted as an issue, with requests for more short-stay, free parking to support local businesses, and concerns about lack of provision in new developments leading to on-street parking problems.

Response:

Parking concerns are noted. The local plan will set out policies on parking standards and design in line with county and national guidance. These will seek to balance the need for adequate provision in new developments with the promotion of sustainable transport alternatives.

However, operational parking management, enforcement, and the provision of free or short-stay spaces in town centres fall outside the scope of the local plan and are considered through separate strategies.

Other Issues:

Other key issues include the cost of public transport versus driving, the impact of the power station's operating days on air quality, antisocial parking, and the need for low emission zones and 20mph limits.

Response:

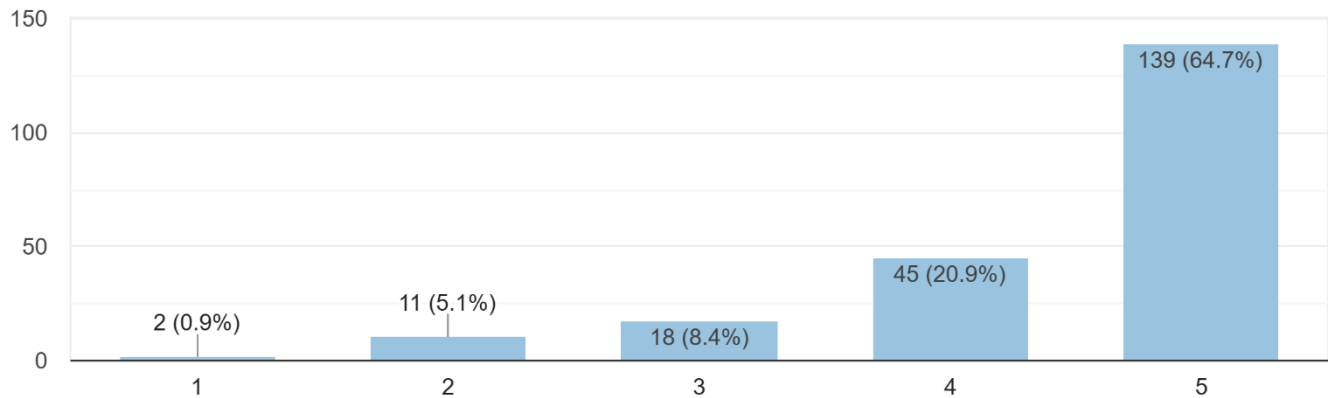
Issues relating to the cost of public transport, emissions from specific sites, antisocial parking behaviour and local traffic management are noted. Many of these matters are outside the scope of the local plan, but concerns will be shared with the relevant authorities. The local plan will focus on policies that support sustainable transport, lower emissions and healthier environments.

Biodiversity

- 4.11. On a scale of 1 (not at all) to 5 (very important) 85.6% of respondents indicated that biodiversity is an important issue for the local plan with 64.7% feeling that biodiversity is a very important issue for the Adur local plan.

How important do you feel these issues are for the Adur Local Plan area?

215 responses



- 4.12. 93 representations provided further comment on this topic. Representations relevant to this theme that were not submitted using the consultation form have also been analysed. The main issues raised were:

Protection of Green Spaces: Emphasize the importance of protecting existing natural environments like New Salts Farm, New Monks Park, Adur SSSI, Shoreham Beach, Widewater Lagoon, Buckingham Park, and green corridors from development.

Response:

Since the 2017 Adur local plan was adopted the requirement of Biodiversity Net Gain has been introduced along with the Environmental Improvement Plan (2023) and Local Nature Recovery Strategies. The Planning and Infrastructure Bill (2025) also proposes changes to how nature conservation issues are considered and addressed through the planning system. The National Planning Policy Framework (2024) requires local plans to protect and enhance sites of biodiversity value and minimise impacts on and provide net gains for biodiversity. To achieve this the local plan will need to identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, and identify and pursue opportunities for securing measurable net gains for biodiversity. The local plan will be informed by a [Biodiversity Study](#) to inform this and help establish locally specific requirements for planning policies.

The Council recognises the importance of protecting valued green spaces, nature sites and green corridors. The local plan will continue to safeguard designated areas, including Sites of Special Scientific Interest (SSSIs), Local Nature Reserves and Local Green Spaces, and seek opportunities to enhance networks of green and blue infrastructure.

Biodiversity Net Gain (BNG): Highlight the need for BNG to be a true increase in biodiversity, not just a theoretical one, and for developers to be held accountable for implementing promised ecological enhancements. Concerns were raised about the effectiveness of current BNG policies and the need for higher targets (e.g. 20%).

Response:

The Council notes calls for stronger implementation of biodiversity net gain. In line with national requirements, new development will be required to deliver a minimum 10% BNG, secured through the planning process. The Council will monitor delivery to ensure that enhancements are implemented and maintained.

The setting of national minimum BNG thresholds is outside the scope of the local plan, though consideration will be given to whether higher targets can be supported locally.

Tree Provision and Management: Stress the importance of planting more trees, especially in residential areas, around schools, and to reduce pollution, but also emphasize the critical need for long-term maintenance and proper selection of tree species.

Response:

The Council supports increased tree planting and management, recognising the role of trees in biodiversity, landscape character, air quality and climate resilience. Local plan policies will encourage appropriate planting in new developments, in public spaces and around schools, alongside requirements for long-term management and the use of species suited to local conditions.

The local plan cannot directly deliver tree planting in existing urban areas, but provides the framework to secure provision in new development.

Sustainable Development: Advocate for the use of brownfield sites over greenfield, the provision of affordable and sustainable housing, and incorporating nature-positive design elements in new developments (e.g., sustainable urban drainage systems (SuDS), swift bricks, hedgehog highways).

Response:

The local plan will promote the re-use of brownfield sites wherever suitable, in preference to greenfield land, and seek to deliver affordable and sustainable housing. Policies will encourage nature-positive design, such as SuDS, swift bricks, hedgehog highways and green infrastructure, to ensure development contributes positively to local environments and communities.

Water Quality and Marine Environment: Address concerns about sewage issues, improving river water quality, and protecting marine biodiversity.

Response:

The Council acknowledges concerns about water quality and the marine environment. The local plan will include policies to protect and enhance water resources, in line with the Water Framework Directive and advice from the Environment Agency. However, the operation of wastewater networks and the discharge of sewage are outside

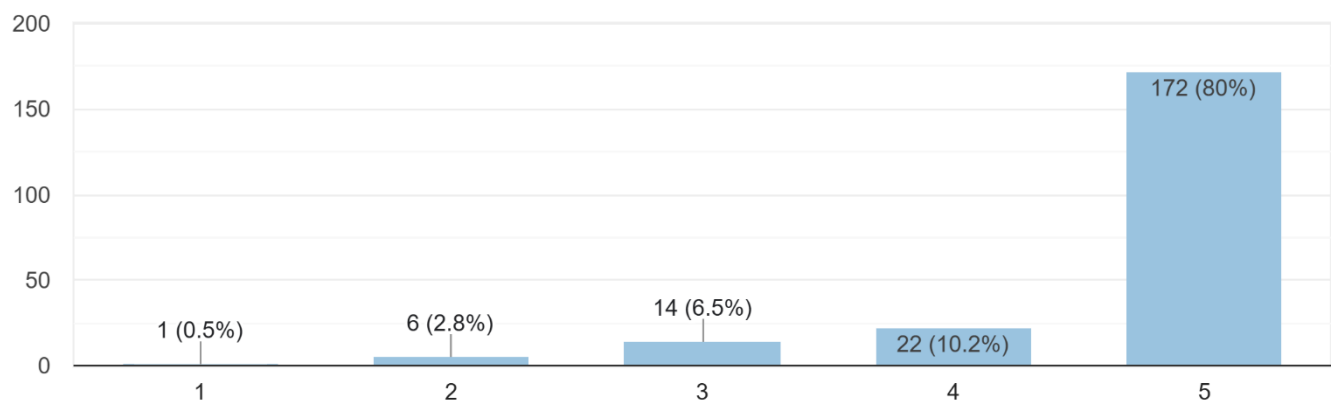
the scope of the local plan, and are the responsibility of Southern Water and the Environment Agency. The Council will continue to raise these concerns with the relevant agencies.

Landscape

- 4.13. On a scale of 1 (not at all) to 5 (very important) 90.2% of respondents indicated that landscape is an important issue for the local plan with 80% feeling that landscape is a very important issue for the Adur local plan.

How important do you feel these issues are for the Adur Local Plan area?

215 responses



- 4.14. 92 representations provided further comment on this topic. Representations relevant to this theme that were not submitted using the consultation form have also been analysed. The main issues raised were:

Protection of Green Spaces and Gaps: Many responses highlight the critical need to protect existing green spaces, green gaps, and natural environments, including the Adur River SSSI and the New Monks Farm Country Park, to prevent coalescence of towns, preserve biodiversity, and provide climate resilience.

Response:

The Council recognises the importance of protecting green spaces, natural environments and strategic gaps between settlements. The local plan will continue to safeguard Sites of Special Scientific Interest (SSSIs), Local Nature Reserves, consider opportunities for Local Green Spaces and identified green gaps to help prevent coalescence, support biodiversity and strengthen climate resilience.

Infrastructure and Development Concerns:

A significant theme is the concern about insufficient infrastructure (roads, schools, GPs, dentists) to support new developments, and the negative impact of high-rise buildings on views, character, and green areas.

Response:

The local plan will be supported by an Infrastructure Delivery Plan (IDP) that identifies

requirements for transport, education, health and utilities. Infrastructure will be secured through Section 106 planning obligations, as the Council does not currently operate a Community Infrastructure Levy.

Concerns about the height, scale and design of new buildings are noted. The local plan will include policies on design quality to ensure new development respects local character and setting. However, the detailed management of GP and dental service provision is outside the scope of the local plan, being the responsibility of the NHS and service commissioners.

Ecological and Environmental Protection:

Respondents emphasize the importance of preserving and enhancing natural habitats, biodiversity, and the unique bird life, particularly within the Adur estuary, and the need for better management of sensitive areas.

Response:

The Council acknowledges the need to protect and enhance habitats and biodiversity, including the Adur Estuary and its birdlife. The local plan will include policies to conserve sensitive areas and secure Biodiversity Net Gain (BNG) from new development. Management of individual reserves or operational decisions by environmental agencies are outside the scope of the local plan but will continue to be supported by partnership working.

River and Coastal Management:

Several responses call for improved access to the river, better water quality, protection of the sea, and managed recreational usage of the river to prevent damage to natural habitats.

Response:

The local plan will include policies to protect water quality and manage recreation in sensitive areas, while improving access where appropriate. The Council will continue to work with partners including the Environment Agency and Natural England to ensure habitats are safeguarded.

However, the operational management of rivers, coastal defences and water quality monitoring sits outside the scope of the local plan, falling under the responsibility of the Environment Agency and Southern Water.

Planning and Design Quality: There are calls for stricter scrutiny of landscaping by developers, the employment of landscape architects to guide designs, and the rejection of inappropriate sites for development, especially those with significant ecological value.

Response:

The Council notes the importance of good design and landscaping in new developments. The local plan will include policies requiring high-quality design, landscape integration, and consideration of ecological value in site selection and development proposals.

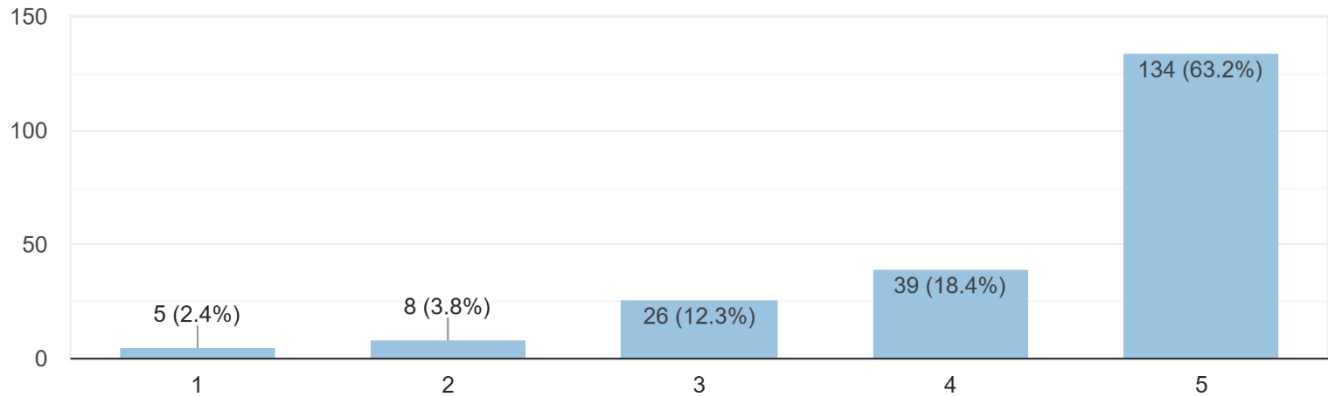
Day-to-day scrutiny of planning applications will remain a matter for the development management process, rather than the local plan.

Soils

- 4.15. On a scale of 1 (not at all) to 5 (very important) 81.6% of respondents indicated that soils was an important issue for the local plan with 63.2% feeling that soils was a very important issue for the Adur local plan.

How important do you feel these issues are for the Adur Local Plan area?

212 responses



- 4.16. 72 representations provided further comment on this topic. Representations relevant to this theme that were not submitted using the consultation form have also been analysed. The main issues raised were:

Brownfield Prioritisation:

Responses strongly advocate for developing brownfield sites, with many emphasizing that it should be the primary focus over greenfield land. However, some caution against over-densification, negative impacts on existing businesses, and the need for proper infrastructure.

Response:

The local plan will prioritise the use of brownfield land where appropriate, in line with national policy. However, it is unlikely that identified housing needs can be met entirely through brownfield redevelopment, so some greenfield sites may need to be considered, subject to strict environmental safeguards. Concerns about over-densification and impacts on businesses are noted and will be addressed through site assessment and design policies.

Greenfield Protection:

Many respondents unequivocally state that greenfield sites, especially chalk grassland, should not be developed due to their ecological value, rarity, and unsuitability for replanting. Functional floodplain areas are also highlighted as unsuitable for development.

Response:

The Council recognises the ecological importance of chalk grassland and other sensitive greenfield areas. The local plan will seek to protect such habitats and direct development towards the most sustainable locations, guided by evidence on ecology, flood risk and

landscape.

Infrastructure and Services:

Several responses express concern about the existing strain on local services such as doctors, schools, and roads, stressing that no further development should occur without adequate infrastructure.

Response:

Concerns about capacity in schools, health care and transport are acknowledged. These matters will be addressed in the Infrastructure Delivery Plan (IDP) and through partnership with West Sussex County Council, NHS England and utility providers.

However, the day-to-day operation and funding of these services is outside the scope of the local plan. The Plan will focus on ensuring new development is supported by appropriate contributions and mitigation.

Environmental Considerations:

The importance of providing green spaces, adding greenery to developments, protecting topsoil, promoting sustainable farming, and addressing soil contamination and carbon storage are recurrent themes.

Response:

The local plan will promote green infrastructure, tree planting, soil protection, and sustainable design. These measures will help support biodiversity, carbon storage and climate resilience.

Specific Site Concerns:

A number of specific sites, including the Shoreham Cement Works are specifically discussed in relation to development suitability.

Response:

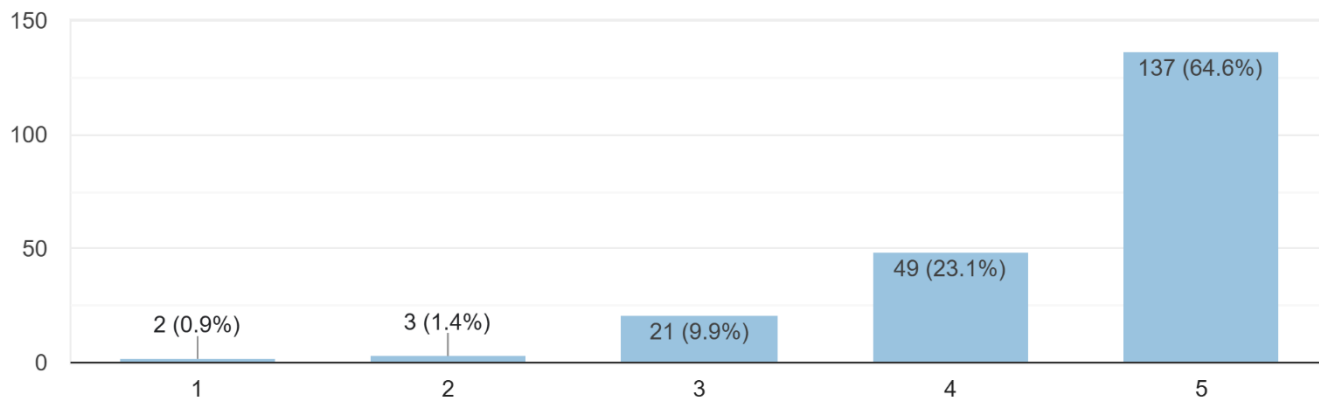
Concerns regarding individual sites are noted. The suitability of sites will be assessed against evidence on ecology, transport, landscape, flood risk and infrastructure capacity. Sites will only be allocated if they can be demonstrated to be sustainable and deliverable. Shoreham Cement Works lies partly within Adur district. However, it is outside the local plan area and covered by the South Downs National Park Authority.

Water

- 4.17. On a scale of 1 (not at all) to 5 (very important) 87.7% of respondents indicated that water is an important issue for the local plan with 64.6% feeling that water is a very important issue for the Adur local plan.

How important do you feel these issues are for the Adur Local Plan area?

212 responses



- 4.18. 87 representations provided further comment on this topic. Representations relevant to this theme that were not submitted using the consultation form have also been analysed. The main issues raised were:

Water Pollution:

Many respondents expressed significant concerns about water pollution, particularly sewage discharges from Southern Water into local rivers and the sea, impacting bathing water quality, biodiversity, and recreational activities. They emphasized the need to hold Southern Water accountable, monitor discharges, and upgrade infrastructure.

Response:

The Council recognises strong concerns about sewage discharges and water quality. National Policy requires the local plan to protect water quality and support achievement of Good Ecological Status or Potential as set out in River Basin Management Plans. The local plan will also be supported by an Infrastructure Delivery Plan (IDP) which will set out the infrastructure needed to support the growth allocated in the local plan. This will be prepared in consultation with infrastructure providers, including Southern Water, and will enable the cumulative impact of development to be considered and assessed and identify the costs and implications for the phasing of development. The local plan will also need to consider how the planning system can support the different ways that the water environment is valued and used.

However, the regulation of wastewater discharge and the operation of sewage treatment is outside the scope of the local plan, being the responsibility of Southern Water and the Environment Agency. The Council will continue to raise concerns with these agencies.

Water Supply & Infrastructure:

Several responses highlighted worries about the adequacy of water resources and

existing infrastructure to support new developments, noting low water pressure and failing sewer systems. There were calls for improved water efficiency, independent assessments of water system capacity, and better management of waste water.

Response:

The current local plan contains policies that seek to improve access to the water, protect and improve water quality, prevent pollution, ensure development is phased with sewerage infrastructure and require water efficiency measures to conserve water resources. National Development Management Policies are likely to be introduced by the Government later in 2025. These are intended to provide clear and consistent policy on key, nationally important issues. As such, these matters will not need to be repeated in a local plan. However, the exact scope of these policies is not yet known. This will allow the local plan to focus on more locally specific matters. As such some issues referred to below may in fact be addressed at the national level.

The operation of the water network and management of supply pressures is outside the scope of the local plan, but the Council will continue to engage with providers.

Water-Based Activities:

Respondents discussed the importance of water-based recreational activities but also raised concerns about their potential negative impact on sensitive ecosystems like River Adur SSSI and birdlife, stressing the need for proper management and protection of natural habitats. Access to water for recreational purposes, including disabled access and public slipways, was also mentioned.

Response:

The local plan will seek to balance recreational access to rivers and coastal areas with the protection of sensitive habitats and species where possible through the planning system. Policies will encourage sustainable access and improved facilities where appropriate.

Day-to-day management of waterways, recreational activity and access provision is outside the scope of the local plan and falls to relevant landowners and agencies.

New Development Concerns:

Some respondents linked water issues to broader concerns about new housing developments, stating that infrastructure, including water and sewage systems, cannot cope with increased population density.

Response:

The Council acknowledges concerns that new housing may put additional strain on water and sewage systems. The local plan requires that new development is supported by adequate infrastructure, secured through partnership working and Section 106 obligations.

Nationalisation:

A few responses suggested the nationalization of water companies to remove profit incentives and ensure better provision of essential services.

Response:

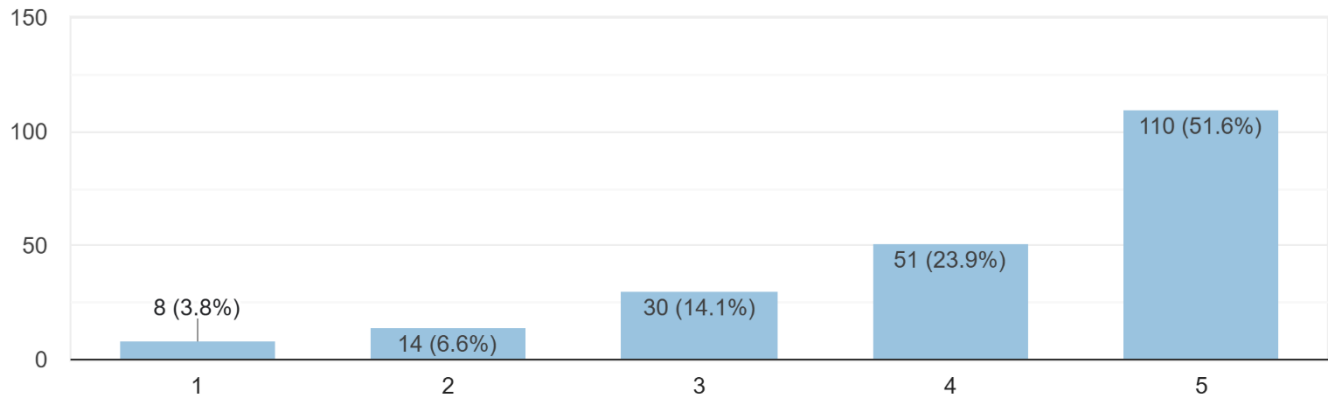
The suggestion of nationalising water companies is outside the scope of the local plan, as this is a matter for national government.

Cultural heritage

- 4.19. On a scale of 1 (not at all) to 5 (very important) 51.6% of respondents indicated that they considered that Cultural Heritage was a very important issue for the Adur local plan.

How important do you feel these issues are for the Adur Local Plan area?

213 responses



- 4.20. 60 representations provided further comment on this topic. Representations relevant to this theme that were not submitted using the consultation form have also been analysed. The main issues raised were:

New Development Impact:

Many respondents expressed concern that new developments do not reflect local characteristics, are architecturally unappealing, and detract from the area's charm and heritage. There's a strong desire for new buildings to be sympathetic to local styles and existing heritage assets.

Response:

The local plan will include policies to ensure that new development reflects local character, heritage assets and high-quality design standards, avoiding harm to the area's historic and architectural distinctiveness.

Protection and Preservation:

A significant theme is the need to protect and preserve local heritage assets, including historic buildings, conservation areas, and the fishing/maritime history of Shoreham. This includes ensuring heritage assets are recorded, promoted, and that new developments do not impinge on them.

Response:

The Council recognises the importance of conserving and enhancing heritage assets. The local plan will include policies to protect listed buildings, conservation areas and non-designated heritage assets, while supporting greater awareness of the area's history and cultural identity.

Heritage Promotion and Education:

Several responses suggested promoting and encouraging learning about local heritage assets through various means, such as information boards, community engagement, and integrating cultural expression into new developments.

Response:

Suggestions for greater community engagement with heritage are noted. While the local plan can promote the protection and interpretation of heritage assets, educational programmes and promotional activities are outside the scope of the local plan.

Conservation Area Enforcement:

There's a call for stronger enforcement of Article 4 directives in conservation areas and for clearer communication to new residents about these regulations.

Response:

The Council acknowledges the importance of effective conservation area management. While the local plan can designate and support conservation areas, the enforcement of Article 4 Directions and planning conditions is outside the scope of the local plan. These matters are managed through development management and enforcement processes

Infrastructure and Overpopulation:

Some respondents raised concerns about the overpopulation caused by new developments, leading to a lack of doctors, schools, roads, and parking, and a general feeling that the area has lost its charm.

Response:

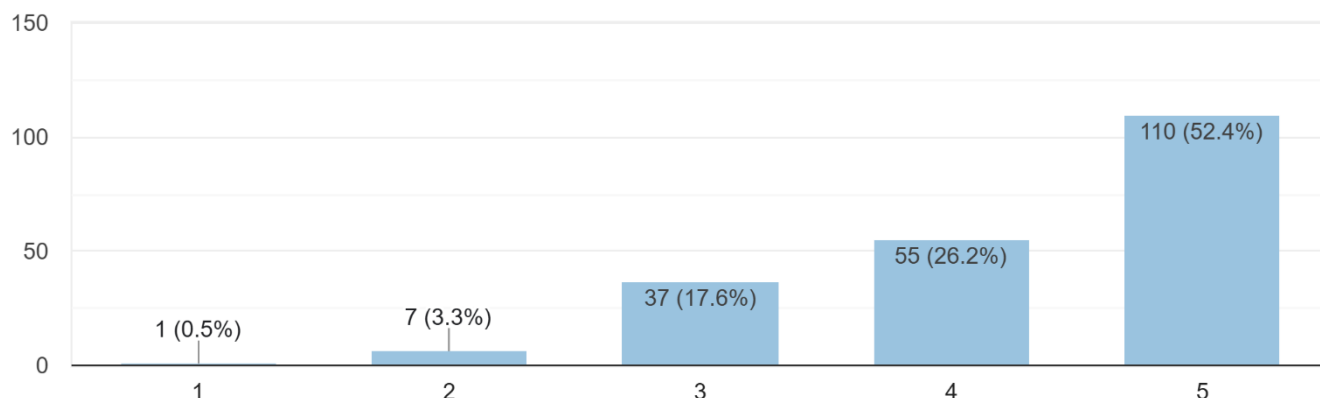
Concerns about pressure on services and perceived overpopulation are noted. These issues will be addressed through the Infrastructure Delivery Plan (IDP) and technical evidence. However, the funding and staffing of health and education services is outside the scope of the local plan.

Economy

- 4.21. On a scale of 1 (not at all) to 5 (very important) 52.4% of respondents indicated that they considered that Economy was a very important issue for the Adur local plan.

How important do you feel these issues are for the Adur Local Plan area?

210 responses



- 4.22. 92 representations provided further comment on this topic. Representations relevant to this theme that were not submitted using the consultation form have also been analysed. The main issues raised were:

High Street Challenges:

Many respondents highlighted the decline of high streets due to high rents/rates, an abundance of charity shops, barbers, and vape shops, and a lack of diverse retail options. There is a call for lower rents/rates, pop-up shops, and a change in focus from traditional high street shops to retail parks.

Response:

The local plan will support the vitality and viability of town centres by promoting a mix of uses, flexible spaces and opportunities for smaller businesses. Business rates and rent levels are outside the scope of the local plan, being matters for central government and private landlords.

Employment and Business Space:

Several responses expressed concerns about the lack of quality job opportunities, particularly for young people, and the unrented state of newly built commercial and industrial spaces like Panattoni Park and the site of the formerly proposed IKEA store. Suggestions include attracting high-skilled employment, promoting green businesses, and re-evaluating the types of businesses being lured to the area.

Response:

The local plan will seek to ensure an appropriate supply of employment land and premises, including support for green and high-skilled jobs. Issues such as the commercial viability of specific sites (e.g. Panattoni Park, former IKEA) are outside the scope of the local plan, but the Plan will provide a framework to guide sustainable

economic growth.

Infrastructure and Planning:

Respondents frequently mentioned issues with infrastructure, including inadequate roads, parking, doctors, schools, and public transport. There's a strong sentiment against further housing development without addressing these concerns and a desire for more strategic planning that prioritizes economic vitality and brownfield development over greenfield sites.

Response:

The council acknowledges concerns regarding infrastructure provision. An updated Infrastructure Delivery Plan (IDP) will accompany the local plan and will identify the transport, education, health, utilities and community facilities required to support planned growth. This work is being undertaken in partnership with infrastructure providers, including West Sussex County Council, the NHS, National Highways and utility companies, to ensure requirements are identified and planned for.

Infrastructure delivery will be secured through planning obligations - Section 106 agreements and Section 273 agreements for highways (as the council does not currently operate a Community Infrastructure Levy). It should be noted that Section 106 contributions can only be used to mitigate the impacts of new development, and cannot be used to remedy existing infrastructure issues.

Infrastructure planning is informed by evidence-based studies, such as transport modelling and assessments of education and health capacity and liaison with the relevant infrastructure providers. Development will be phased and required to provide infrastructure in step with growth, to ensure that the needs of existing and future residents are met.

Protecting Local Businesses:

A recurring theme is the need to protect existing local businesses and promote a more vibrant local economy. This includes calls for supporting small entrepreneurs, ensuring sufficient flexible business spaces, and considering the impact of commercial property monopolies on the diversity of shops.

Response:

The Council supports the retention and growth of local businesses. The local plan will include policies to promote flexible business spaces and a diverse local economy, while recognising that wider economic trends and landlord decisions are outside the scope of the local plan.

Tourism and Economy:

Some responses suggested promoting tourism by providing more hotel beds and encouraging schemes to attract businesses, emphasizing the need for a circular economy and sustainable practices.

Response:

The local plan will support sustainable tourism, including the provision of visitor accommodation and leisure opportunities, while protecting environmental assets. Wider tourism promotion and economic programmes are outside the scope of the local plan.

Any other issues

- 4.23. 130 representations identified other topics or issues. The main issues raised were:

Infrastructure:

Many respondents expressed concerns about the lack of adequate infrastructure, including roads, parking, schools, GP surgeries, dentists, public transport, and sewage systems, to support current and future population growth. There is a strong sentiment that new developments should be halted until these issues are addressed.

Response:

Concerns about infrastructure provision are noted. The local plan will be supported by an Infrastructure Delivery Plan (IDP) developed in liaison with infrastructure providers. The council will secure contributions through Section 106 agreements. However, day-to-day service provision (e.g. GP appointments, school place allocation, road maintenance) is outside the scope of the local plan.

Housing and Development Quality:

A significant number of responses focused on the type and quality of new housing, with strong opposition to high-rise flats and a call for more affordable housing, social housing, and homes for young people and families. Respondents also emphasized the need for better design, energy efficiency, and consideration of local character (e.g., using flint).

Response:

The local plan will seek to ensure the delivery of affordable housing, family homes, and high-quality, energy-efficient design that reflects local character. Policies will resist inappropriate forms which are out of keeping with local context.

Environmental Protection and Green Spaces:

Respondents highlighted the importance of greater environmental protection, avoiding building on functional floodplains, enhancing nature, planting more trees, and maintaining open spaces. Concerns about pollution and the impact of development on the shoreline and seas were also raised.

Response:

The Council will continue to protect floodplains, green spaces and natural environments, while promoting biodiversity net gain, tree planting and sustainable design.

Planning Process and Community Engagement:

Several respondents called for an overhaul of the planning application process, emphasizing the need for more transparent and ethical practices, greater community involvement, and stronger enforcement. There is a desire for the council to prioritise residents' needs over developers' interests.

Response:

The Council's approach to consultation is set out in the Statement of Community Involvement (SCI). The local plan will continue to be prepared in line with statutory requirements for engagement. Broader reforms of the planning system are outside the scope of the local plan but are governed by national legislation.

Economic and Social Aspects:

Other topics mentioned include the need to attract visitors through tourism, addressing loneliness, providing more indoor recreation and "third places" (clubs, gyms, pubs), and ensuring a balance of businesses in town centres.

Response:

The local plan can support the provision of leisure, community and recreation facilities, as well as mixed-use developments that encourage social interaction. Broader social programmes such as tackling loneliness are outside the scope of the local plan but can be supported indirectly through planning policies.

5. Next steps

- 5.1. The consultation responses will be used to inform the preparation of the new Adur local plan.
- 5.2. The council is currently awaiting the introduction of new National Development Management policies alongside other changes to the planning system. These national changes will impact the scope and content of the plan.