

Report by the Head of Planning and Community

Adur Development Plan Core Strategy Submission Document:

- **Summary of Representations Submitted**
- **Use of Policies for Development Control Purposes**

1.0 Summary

- 1.1 The Core Strategy Submission document, as part of the Adur Development Plan was submitted to the Secretary of State on the 31st January 2007. At the same time, the document was made available for public consultation over a period of six weeks and representations invited on the 'soundness' of the Plan. A Public Examination will commence on the 18th September of this year to consider the 'soundness' of the Core Strategy. An Inspector has been appointed to hold the Examination and he will select the issues and matters to be dealt with at this Examination.
- 1.2 The purpose of this report is to provide a summary of the representations received on the policies in the Core Strategy Submission document. The report does not contain a detailed response to each of the representations since the Inspector has yet to select issues and topics to be dealt with at the Examination. However, the report indicates the type of minor amendments to be made to some of the policies in response to objections from a number of statutory agencies which can be the subject of further discussion with such bodies and then put forward in 'statements of common ground' to the Inspector.
- 1.3 The report also lists those policies which have not been objected to and seeks approval for the use of these policies, together with saved policies in the adopted 1996 Adur Local Plan and Government Planning Policy Statements for development control purposes.

2.0 Recommendations

Members are recommended to:

- 2.1 Note the representations which have been submitted on the Core Strategy Submission (set out in Appendix 2 as a separate document).
- 2.2 Note the type of amendments (as outlined in paragraphs 4.5 and 4.6 of this report) to be made to the policies as requested by statutory agencies and to agree that these be the subject of further discussions with such bodies.
- 2.3 Agree that the following be used for development control purposes:
 - Core Strategy policies set out in Table 1 in paragraph 4.1 of this report,
 - Saved policies in the adopted Local Plan together with relevant supplementary planning guidance notes
 - Government Planning Policy Statements.

3.0 Background

- 3.1 A new Development Plan is being produced for the district in line with a new planning system which has introduced Local Development Frameworks to replace old style local plans. The first document that has been prepared is the Core Strategy which contains strategic spatial policies to inform planning as well other Council decisions involving land use issues for the next 20 years.
- 3.2 Following two earlier consultation stages, the Core Strategy was submitted to the Secretary of State on January 31st 2007 and made available for public consultation over a six week period. Representations were invited on the 'soundness' of the Plan.

4.0 A Summary of the Representations Submitted on the Core Strategy

- 4.1 A total of 29 organisations and individuals submitted representations on the Core Strategy with the majority of objections from developers and landowners. There have also been objections submitted by SEERA, the Highways Agency and the Environment Agency although it is anticipated that these may not need to be dealt with at the Examination if some minor word changes can be agreed. The total number of representations amounted to 274, of which 220 considered elements of the Plan to be unsound and 54 considered them sound. These representations are contained in Appendix 2 (in a separate document). The policies which have received the most objections (5 and above representations) are as follows (see appendix 3 for a full list):

Table 1

The policies which have received 5 and above objections are as follows:

- Spatial Strategy = 11
- Policy R3 (Shoreham Harbour) = 6
- Policy R4 (Shoreham Airport) = 14
- Policy E1 (Retaining and Enhancing Existing Employment Sites) = 16
- Policy E2 (New Employment Provision) = 7
- Policy H1 (Providing New Homes in the right Location) = 20
- Policy H2 (Securing Affordable Homes) = 16
- Policy H3 (Housing Mix, Density and Design) = 7
- Policy T2 (Road Infrastructure Requirements) = 5
- Paragraph 13.25 (East Worthing Access Road) = 10
- Policy ENV6 (Gaps Between Settlements) = 12
- Policy ENV10 (The Built and Historic Environment) = 5

Table 2

The policies which have not received any objections or received less than 5 are as follows:

- R1 (Regeneration)
- R2 (Regenerating Deprived Residential Areas)
- R5 (Shoreham Cement Works)
- E3 (The Visitor Economy)
- STC1 (Town Centres)
- STC2 (Lancing Town Centre) (**No objections**)

- STC3 (Shoreham Renaissance) (**No objections**)
- STC4 (Local Shopping Parades) (**No objections**)
- H4 (Accommodating Gypsies and Travellers)
- CI1 (Existing and New Community, Leisure and Cultural Facilities)
- CI2 (Infrastructure and Planning Obligations)
- T1 (Sustainable Transport)
- T3 (New Developments and Requirements to Achieve Sustainable Transport)
- T4 (Car Parking) (**No objections**)
- ENV1 (Open Spaces within Urban Areas)
- ENV2 (Sustainable Energy Generation)
- ENV3 (Flood Risk)
- ENV4 (Resource Efficient Buildings)
- ENV5 (Landscape and Townscape Character) (**No objections**)
- ENV7 (South Downs)
- ENV8 (River Adur)(**No objections**)
- ENV9 (The Coast) (**No objections**)

4.2 It is these policies in Table 2 which are recommended to be used for development control purposes (but bearing in mind that in the event of an appeal, these may be afforded only limited weight before the Inspector's report of the Core Strategy Examination is submitted). In addition to these policies, a number of policies in the adopted Local Plan have been put forward to the Secretary of State with a request that these be saved beyond September 2007 (three years since the commencement of the Planning and Compulsory Purchase Act). Such policies need to meet the criteria set by the government – i.e. that policies to be saved must be consistent with national policy and not duplicate national policy. In addition, the government's Planning Policy Statements can be used to guide planning decisions. For example, Planning Policy Statement 3 on Housing will be used to secure appropriate affordable housing for residential proposals of 15 dwellings or more. The current Interim Guidance Note on Affordable Housing as well as up to date information on housing needs will inform the amount and type of affordable housing to be secured.

Issues raised in the representations

4.3 The purpose of the examination is to consider if the Core Strategy is sound against 9 tests of soundness which are outlined in Planning Policy Statement 12 on Local Development Frameworks. The representations which have been submitted which do not consider the Core Strategy to be sound refer to **all** the tests although the tests most commonly referred to are as follows:

- Test iv – It is a spatial plan which is consistent with national planning policy and in general conformity with the regional spatial strategy for the region and it has properly had regard to any other relevant plans, policies and strategies relating to the area or to adjoining areas.
- Test vi – The strategies/policies/allocations in the plan are coherent and consistent within an between development plan documents prepared by the authority and by neighbouring authorities, where cross boundary issues are relevant.

- Test vii - The strategies/policies/allocations represent to the most appropriate in all the circumstances, having considered the relevant alternatives, and they are founded on a robust and credible evidence base. (This test is referred to the most.)
- Test viii – There are clear mechanisms for implementation and monitoring.
- Test ix – The Plan is reasonably flexible to enable it to deal with changing circumstances.

The Inspector will use these tests to help him select those issues and topics to be examined.

4.4 The issues raised are detailed in Appendix 4 with the main issues outlined below:

Regenerating Adur

R3 – Shoreham Harbour

- Concern that the policy is insufficiently flexible to meet the changing circumstances surrounding the regeneration of Shoreham Harbour.
- Concerns about flood risk - the policy should avoid flood risk rather than mitigate. Where is the evidence that the sequential and exception tests have been applied to inform the location of development at Shoreham Harbour.
- Concern about the transport impacts in relation to the regeneration of the Harbour. A lack of clarity about the transport impacts on neighbouring authorities.
- Concern that operational wharves are a rarity in South East England and should be protected to facilitate short sea shipping. The consolidation of port uses should retain wharf frontages

R4 – Shoreham Airport

- Concern about flood risk, nature conservation, biodiversity impacts and the impact of the airport on the Sussex Downs AONB
- Has Phase 1 of the Adur and Worthing Strategic Flood Risk Assessment informed this policy and alternatives for development sites been considered?
- Concern that the policy is restrictive in respect of non-airport related business
- Policy is unclear in relation to retaining the gap between Shoreham and Lancing as it seeks to preserve the open area of land between Shoreham and Lancing at the same time as allocate the airport as a location for additional employment land.
- A clearer indication of the scale of development and appropriate environmental enhancements at the airport is needed.

R5 – Shoreham Cement Works

- Development should be limited to only as much as is needed to secure the remediation of the site as it is located within the AONB

- Concern that the transport of residual waste as a result of any waste treatment on site could have implications for the road network in Brighton and Hove

Employment Opportunities

E1 – Retaining and enhancing new employment sites

- Residential development or mixed use development should in certain circumstances be located on allocated employment sites that are rundown, vacant and/or poorly located in line with PPS3
- The policy should be amended to provide robust protection of existing employment land and the jobs that rely thereon – criteria need to be revised.
- Policy E1 should clarify that ‘other uses’ for former employment sites should not normally include town centre uses, such as retail and leisure.

E2 – New Employment Provision

- Policy should refer to the inappropriateness of developing new employment sites within the AONB (with the exception of the cement works site)
- The quantum of floorspace to be provided in the period to 2026 should be specified and the policy amended to allow for greenfield development where justified through the application of the sequential Test.

Enhancing Adur’s Shopping Provision and Town Centres

STC1 – Town Centres

- Policy is considered too restrictive in respect of PPS6 which recognises the need for the creation of new centres
- An extension to the existing town centre of Shoreham should be accommodated to cater for the growth of the town.

Delivering new homes

Policy H1 (Providing Homes in the right Location)

- Concerned about insufficient supply of appropriate brown field sites to provide housing and the definition of previously developed land. Is there a need for Greenfield sites other than as contingency sites?
- An allocation in the Shoreham-Lancing Gap would meet requirements of PPS3.
- Restricting a search for Greenfield contingency sites to the west of Sompting and east of Lancing is unjustified and too restrictive.
- What is the housing capacity at Shoreham harbour? Will it be difficult to provide 500 homes at Shoreham harbour given infrastructure constraints. Is the capacity significantly greater than 500 homes?

Policy H2 Securing Affordable Homes

- Concern that the policy does not accord with PPS3 in terms of the threshold of 10 or more units, – alternatives have not been considered.

- Policy should be more flexible in terms of the amount of affordable housing required. To be subject to negotiation on a site by site basis.
- No provision is made for intermediate housing.

Policy H3 Housing Mix, Density and Design

- Requirement for all homes to be built to lifetimes homes standards is contrary to PPS1

Improving Travel and Access in Adur

T2 – Road Infrastructure Requirements

- Unclear how improvements for accessing the port could or would be achieved and their impact on neighbouring authorities
- Concerned that the Policy does not identify existing deficiencies on the trunk roads and highways. A district wide road improvement strategy is needed.

T3 – New Developments and Requirements to achieve Sustainable Transport

- Regards proposed developments close to the A27, a joint working approach is needed to provide a package of measures for managing transport demand and as a last resort funding towards transport infrastructure.
- Further information is needed to supplement the transport study undertaken.

EWAR text

- A specific EWAR policy would provide greater clarity
- There should be a commitment to delivering a new road
- In view of the delay to traffic, a new junction on the A27 would cause, the Highways Agency would only support EWAR if it removed traffic from the Trunk Road.

Improving Adur's Environment

ENV2 – Sustainable Energy Generation

- Concern that the requirements of this policy could make some schemes unviable, stifling regeneration and preventing important housing sites coming forward.

ENV4 – Resource Efficient Buildings

- Concern about the reasonableness of the policy - there should be no potential within the remit of local planning authorities to influence the performance standards of residential development.

ENV6 – Gaps between Settlements

- The policy should be amended to reflect the fact that Greenfield development may be permitted to provide homes and employment opportunities. New sites on the edge of the built-up area may also need to be identified to help meet the

needs of the sub-region as identified in the Draft South East Plan, not just the needs of the district

- Concerns that the policy is not in accordance with PPS7 (which advises a criteria-based approach) nor RPG9 (which requires LPAs to rigorously assess the function and justification for Strategic Gaps)
- The policy places an undue restriction on land within Shoreham Airport which is a sustainable location for new employment related development
- Policy should recognise that for “Land Between Sompting and Worthing” transport improvements could include measures to resolve congestion on the A259 and A27 Trunk Route

ENV10 – The Built and Historic Environment and Public Realm

- Concern about effective ways of enhancing Conservation Areas. Schemes to enhance Conservation Areas should be welcomed at the earliest possible date.

Representations from Statutory Agencies

4.5 A number of statutory agencies as well as adjacent local authorities have submitted formal representations as well as informal comments. Such bodies include the Highways Agency, the Environment Agency, SEERA and GOSE. The Government Office and PINS expects the issues raised by such bodies to be resolved prior to the Examination. Meetings with these bodies will take place prior to the Examination to agree some minor amendments to some of the policies which can be put forward in ‘statements of common ground’ to the Inspector. Generally, these bodies have raised a variety of concerns with regard to:

- § Issue omissions in some policies (e.g. water quality and employment floorspace figures for the main employment areas)
- § Cross references to the Plans of adjacent authorities
- § Consistency with the South East Plan and government PPS (e.g. on housing)
- § Format of the document (e.g. its length)
- § How evidence has informed the policies (e.g. flood risk and transport studies)
- § Consideration of alternative options (e.g. for development at Shoreham Harbour)
- § Delivery and funding aspects (e.g. for transport infrastructure)

4.6 It is anticipated that in order to meet the concerns of the above statutory bodies, a number of minor amendments can be proposed to be made to the policies and to the supporting text as well as to the monitoring and implementation section. In most cases, such amendments will constitute additions to make the policies clearer and to ensure consistency with other plans and strategies. With respect to the Highways Agency and the Environment Agency, additional evidence will need to be demonstrated, for example information from Part 2 of the Strategic Flood Risk Assessment, from additional work being done on Shoreham Maritime and from the Transport study.

Local Government Act 1972

Background Papers:

Adur Development Plan Core Strategy – Issues and Options
Adur Development Plan Core Strategy Preferred Options
Planning Policy Statement 12 – Local Development Frameworks
The Town and Country Planning Regulations 2004

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Appendix 1

1.0 Council Objective

- 1.1 The development plan will help to:
Create a clean, green and safe environment by protecting the best of Adur's environmental assets, steering development to sustainable locations and through policies to secure quality design.
Revitalise Adur through policies to secure economic and town centre regeneration as well as community well being.
Contribute to the implementation of the Community Strategy and other partnership initiatives through providing a clear spatial vision for the future of the District and through spatial policies.

2.0 Specific Targets

- 2.1 By having an up to date development plan, a large range of economic, social and environmental targets will be met

3.0 Sustainability Issues

- 3.1 The Government requires that the all development plan documents be subject to a formal sustainability appraisal. The new plan aims to promote sustainable development .

4.0 Equality Issues

- 4.1 The new development plan aims to ensure that all groups in the district have equal access to the spatial opportunities offered by the new development plan. For example, child care, training opportunities, affordable housing and public transport are key issues being addressed through the new plan to promote equal opportunities.

5.0 Community Safety issues (Section 17)

- 5.1 The new development plan addresses community safety issues.

6.0 Human Rights Issues

- 6.1 At this stage of the development plan process, no negative issues have been identified.

7.0 Financial Implications

- 7.1 Finance for progressing the new development plan is budgeted. A number of studies have been and are currently being undertaken by consultants which are funded in the main from planning delivery grant from the government.

8.0 Legal Implications

- 8.1 The new development plan is being produced in accordance with the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Development) (England) Regulations 2004.

9.0 Consultations

- 9.1 LSP Stakeholder Planning Forum, Team Adur and the Community Strategy and Development Plan Working Group.

10.0 Risk assessment

- 10.1 There is a statutory duty on the Council to produce the development plan and failure to meet the milestones as set out in the Council's Local Development Scheme could impact on a number of this council's priorities including economic and social regeneration as well as the delivery of affordable housing. Failure could also jeopardise the receipt of planning delivery grant (on which the progress of the plan depends). Staffing and resources to undertake the new plan are critical.

11.0 Health & Safety Issues

- 11.1 Matters considered and no issues identified.

12.0 Procurement Strategy

- 12.1 This report complies with the Procurement Strategy.

13.0 Partnership Working

- 13.1 The delivery of a number of policies in the Core Strategy will depend on partnership working between a range of relevant bodies and agencies.

APPENDIX 3

| Part of Core Strategy | Sound | Unsound | Total responses |
|---|-------|---------|-----------------|
| General | 1 | 5 | 6 |
| Key Diagram (and Paragraph 6.2) | 1 | 8 | 9 |
| Paragraph 4.1 (Key Drivers) | 1 | 2 | 3 |
| Paragraph 4.2 (Main characteristics of Adur) | 1 | 0 | 1 |
| Paragraph 4.3 (Main characteristics of Adur) | 1 | 0 | 1 |
| Paragraph 4.4 (Main characteristics of Adur) | 1 | 0 | 1 |
| Paragraph 4.5 (Main characteristics of Adur) | 0 | 1 | 1 |
| Paragraph 5.2 (Spatial Vision) | 1 | 6 | 7 |
| Paragraph 5.3 (Strategic Objectives) | 0 | 1 | 1 |
| Paragraph 6.1 (Spatial Strategy) | 2 | 11 | 13 |
| Paragraph 7.1 (Core Policies – Introduction) | 0 | 1 | 1 |
| REGENERATING ADUR | | | |
| Section 8 (whole) (Regenerating Adur) | 1 | 0 | 1 |
| R1 (Regeneration) | 3 | 2 | 5 |
| R2 (Regenerating Deprived Residential Areas) | 0 | 1 | 1 |
| Para 8.5 (Shoreham Harbour) | 0 | 1 | 1 |
| Para 8.6 (Shoreham Harbour) | 0 | 1 | 1 |
| R3 (Shoreham Harbour) | 0 | 6 | 6 |
| R4 (Shoreham Airport) | 0 | 14 | 14 |
| Para 8.8 (Shoreham Airport) | 1 | 0 | 1 |
| Para 8.9 (Shoreham Airport) | 0 | 1 | 1 |
| Para 8.10 (Shoreham Airport) | 0 | 1 | 1 |
| Para 8.11 (Shoreham Airport) | 1 | 0 | 1 |
| R5 (Shoreham Cement Works) | 1 | 3 | 4 |
| EMPLOYMENT OPPORTUNITIES | | | |
| Para 9.3 | 0 | 2 | 2 |

| Part of Core Strategy | Sound | Unsound | Total responses |
|---|-------|---------|-----------------|
| (Protection of Existing Employment Land) | | | |
| E1 (Retaining and Enhancing Existing Employment Sites) | 1 | 16 | 17 |
| Para 9.6 (New Employment Land) | 0 | 1 | 1 |
| E2 (New Employment Provision) | 2 | 7 | 9 |
| E3 (The Visitor Economy) | 2 | 1 | 3 |
| ENHANCING ADUR'S SHOPPING PROVISION AND TOWN CENTRES | | | |
| STC1 (Town Centres) | 2 | 2 | 4 |
| STC3 (Shoreham Renaissance) | 1 | 0 | 1 |
| DELIVERING NEW HOMES | | | |
| Para 11.4 (Providing new Homes in the Right Locations) | 0 | 4 | 4 |
| Para 11.6 (Providing new Homes in the Right Locations) | 1 | 1 | 2 |
| Para 11.7 (Providing new Homes in the Right Locations) | 0 | 2 | 2 |
| Para 11.8 (Providing new Homes in the Right Locations) | 0 | 1 | 1 |
| H1 (Providing new Homes in the Right Locations) | 0 | 20 | 20 |
| Para 11.10 (Securing Affordable Homes) | 0 | 5 | 5 |
| Para 11.15 (Housing Mix, Density and Design) | 0 | 3 | 3 |
| Para 11.17 (Housing Mix, Density and Design) | 0 | 3 | 3 |
| H2 (Securing Affordable Homes) | 2 | 16 | 18 |
| H3 (Housing Mix, Density and Design) | 1 | 7 | 8 |
| H4 (Accommodating Gypsies and Travellers) | 0 | 3 | 3 |

| Part of Core Strategy | Sound | Unsound | Total responses |
|--|-------|---------|-----------------|
| <i>PROVIDING FOR ADUR'S COMMUNITY AND INFRASTRUCTURE NEEDS</i> | | | |
| Section 12 (whole) (Community and Infrastructure Needs) | 0 | 1 | 1 |
| CI1 (Existing and New Community, Leisure and Cultural Facilities) | 2 | 3 | 5 |
| Para 12.10 (Infrastructure and Planning Obligations) | 1 | 0 | 1 |
| CI2 (Infrastructure and Planning Obligations) | 2 | 2 | 4 |
| T1 (Sustainable Transport) | 1 | 2 | 3 |
| <i>IMPROVING TRAVEL AND ACCESS IN ADUR</i> | | | |
| 13.10 (Sustainable Transport) | 0 | 1 | 1 |
| T2 (Road Infrastructure Requirements) | 2 | 5 | 7 |
| T3 (New Developments and Requirements to Achieve Sustainable Transport) | 2 | 1 | 3 |
| T4 (Car Parking) | 1 | 0 | 1 |
| 13.25 (East Worthing Access Road) | 0 | 10 | 10 |
| <i>IMPROVING ADUR'S ENVIRONMENT</i> | | | |
| 14.1 (Improving Adur's Environment – Introduction) | 0 | 1 | 1 |
| Para 14.1 (Improving Adur's Environment – Introduction) | 0 | 1 | 1 |
| Para 14.4 (Nature Conservation and Biodiversity) | 0 | 1 | 1 |
| ENV1 (Open spaces Within the Urban Area) | 1 | 1 | 2 |
| Para 14.9 (Sustainable Energy Generation) | 1 | 0 | 1 |
| ENV2 (Sustainable Energy | 1 | 3 | 4 |

| Part of Core Strategy | Sound | Unsound | Total responses |
|--|-----------|------------|-----------------|
| Generation) | | | |
| ENV3 (Flood Risk) | 1 | 1 | 2 |
| Para 14.13 (Resource Efficient Buildings) | 1 | 2 | 3 |
| Para 14.14 (Resource Efficient Buildings) | 1 | 0 | 1 |
| ENV4 (Resource Efficient Buildings) | 2 | 4 | 6 |
| ENV5 (Landscape and Townscape Character) | 1 | 0 | 1 |
| Para 14.16 (Gaps Between Settlements) | 0 | 1 | 1 |
| ENV6 (Gaps Between Settlements) | 1 | 12 | 13 |
| Para 14.17 (The South Downs) | 1 | 0 | 1 |
| Para 14.18 (The South Downs) | 1 | 0 | 1 |
| ENV7 (The South Downs) | 1 | 2 | 3 |
| ENV8 (The River Adur) | 1 | 0 | 1 |
| ENV10 (The Built and Historic Environment and Public Realm) | 1 | 5 | 6 |
| MONITORING AND IMPLEMENTATION | | | |
| Annex 1 – Monitoring and Implementation | 0 | 2 | 2 |
| TOTALS | 54 | 220 | 274 |

APPENDIX 4

LIST OF ISSUES ARISING FROM REPRESENTATIONS SUBMITTED ON THE ADUR CORE STRATEGY

Regenerating Adur

R1 – Regeneration

- Measures to protect the environment and minimise the impacts of development are included in policies ENV1 to ENV9 and in national planning guidance. Therefore they do not need to be included in the policy.

R2 – Regenerating Deprived Residential Areas

- The policy should be amended to acknowledge the fact that the regeneration of the Wards in most need is not necessarily dependent alone on development within the wards. Development in the vicinity of the Wards could also benefit from them through the provision of facilities in sustainable locations.

R3 – Shoreham Harbour

- No reference is made to the identification of the Harbour as a potential site for wind turbines in the Brighton & Hove Site Allocations Issues and Options paper. If Brighton and Hove commits to the use of wind turbines to provide renewable energy, then it would be preferable (in landscape terms) to locate such turbines on Shoreham Harbour, rather than the northern urban fringe
- The policy is not sufficiently flexible to meet the changing circumstances surrounding the regeneration of Shoreham Harbour
- Policy should be recast to ensure that no development is permitted that is unacceptable in terms of flood risk. The policy implies that development will be permitted and flood risk mitigated. This suggests that the guiding principle of the policy is mitigation rather than the avoidance of flood risk
- The policy should include consideration of how any proposals in the short terms at the Harbour might impact on the long terms plans such as by reducing the amount of land available to implement any long-term vision
- The Core Strategy should be more explicit about the transport impacts that will be acceptable or not in relation to the regeneration of the Harbour. There is a lack of clarity about the transport impacts on neighbouring authorities that would be acceptable under the policy
- Concern that the transport of residual waste as a result of any waste treatment on site could have implications for the road network in Brighton and Hove. It should be set out clearly in the core strategy that Brighton and Hove City Council should be consulted on any application for development at Shoreham Cement Works.
- Operational wharves are a rarity in South East England and should be protected to facilitate short sea shipping. The consolidation of port uses should retain wharf frontages together with an appropriate working hinterland for port-related activities. Non port related uses should only be considered where there are clear operational reasons why the wharves cannot be used for sustainable transport of goods/materials

- It is unclear how Phase 1 of the Adur and Worthing SFRA has informed this policy and whether alternatives for development sites have been considered.
- There is not adequate evidence available to confirm whether the allocation of 500 new homes at the Harbour is feasible
- There is no evidence that the sequential and exception tests have been applied to inform the location of development at Shoreham Harbour.

R4 – Shoreham Airport

- The policy is contrary to Policy Response P3.7 (Growth in aviation) of the South Downs Management Plan
- The policy should acknowledge the impact of the airport on the Sussex Downs AONB
- The policy should be recast to ensure no development is permitted that is unacceptable in terms of flood risk, nature conservation or biodiversity impacts and no increase in flight numbers will be permitted unless environmental impacts, including noise, do not adversely affect the environment taking account of the impact both on the existing community and development opportunities consistent with the objective to secure the economic and social regeneration of Adur.
- The policy should clarify that Shoreham Airport is a brownfield site
- The policy should not be so restrictive in respect of non-airport related business
- The policy should encourage mixed-use development around the terminal building to enhance the airport's role as a visitor attraction and help bring forward employment development
- The policy is unclear in relation to retaining the gap between Shoreham and Lancing as it seeks to preserve the open area of land between Shoreham and Lancing at the same time as allocate the airport as a location for additional employment land
- The policy should give a clearer indication of the scale of development contemplated at the airport and the environmental enhancements that might be considered appropriate
- The policy refers to sustainable transport improvements – is this feasible when probably less than 0.1% of UK's transport uses sustainable fuels?
- The policy states that the environment of the airport will be enhanced. How?
- How can the gap between Shoreham and Lancing be maintained if there is internal growth at the airport?
- How will new development mitigate the risk of flooding at the airport?
- The policy framework for the Airport should be driven by the wishes of the community

R5 – Shoreham Cement Works

- Policy does not limit development to only as much as is needed to secure the remediation of the site which should be the principle objective of any redevelopment as it is located within the AONB

Section 9 – Employment Opportunities

E1 – Retaining and enhancing new employment sites

- Adur District Council should review their non-housing sites within this area as some of the sites may be better used for housing or mixed-use development
- Residential development or mixed use development should in certain circumstances be located on allocated employment sites that are rundown, vacant and/or poorly located.
- The policy is considered too restrictive in respect of PPS3 which acknowledges that currently allocated industrial and commercial uses may be better utilised with a mix of uses
- The policy is inconsistent with policy E2 which takes a more flexible approach and encourages the consideration of mixed uses where appropriate
- The policy should be amended to provide robust protection of existing employment land and the jobs that rely thereon. Mere conflict with neighbouring uses should not in itself be sufficient to accept the loss of employment land and the jobs that it may support
- A wide range of employment land is required to support all sectors of the business, industrial and commercial economy. The fact that a property does not lend itself to 'modern needs' should not permit the loss of employment space. Greater clarity is required of the marketing requirements in the policy.
- A proposal to upgrade employment floorspace should not in itself permit the loss of part of the existing floorspace
- It is important to retain a portfolio of employment land suitable for all types of firms and uses that cannot afford to compete for higher freehold prices or leasehold rents arising from modern development and property available on institutional leases
- Policy E1 should clarify that 'other uses' for former employment sites should not normally include town centre uses, such as retail and leisure, where sequentially preferable sites are available, or should include an explicit cross-reference to relevant policies such as PPS6
- The inclusion of the figure of 500 homes at Shoreham Harbour in the supporting text is premature in light of the ongoing review of the 1999 Shoreham Maritime Vision, and an emerging Delivery Plan for Shoreham Harbour and subsequent Joint Area Action Plan.

E2 – New Employment Provision

- Policy should refer to the inappropriateness of developing new employment sites within the AONB (with the exception of the cement works site) and that any development within the AONB should include mitigation measures to reduce the potential impact
- The quantum of floorspace to be provided in the period to 2026 should be specified and the policy amended to allow for Greenfield development where justified through the application of the Sequential Test.
- The supporting text for this policy should clarify that Shoreham Airport is a brownfield site
- Policy SCT4 of the Draft South East Plan should be made reference to in the supporting text

E3 – The Visitor Economy

- The policy should be given a spatial perspective showing where the uses and activities listed in the policy will be considered appropriate
- The role of Shoreham Airport as a visitor centre should be referred to in the supporting text.

Enhancing Adur's Shopping Provision and Town Centres

STC1 – Town Centres

- Policy is considered too restrictive in respect of PPS6 which recognises how the role and function of existing centres can evolve over time and recognises the need for the creation of new centres
- Policy should adopt a more realistic approach in being able to effectively cater for the growth of the town. An extension to the existing town centre of Shoreham should be accommodated
- A bespoke survey, more reflective of Adur's needs and requirements, has not been prepared or commissioned which undermines the policy STC1.

Delivering new homes

Policy H1 (Providing Homes in the right Location)

- Should be a presumption against greenfield residential development within the Area of Outstanding natural Beauty
- Sceptical about the sufficiency of appropriate brown field sites to provide housing and concerned about the definition of previously developed land.
- Core Strategy should recognise the need for Greenfield sites other than as contingency sites.
- Restricting a search for Greenfield contingency sites to the west of Sompting and east of Lancing is unjustified and too restrictive.
- Reliance on previously developed land is inconsistent with PPS3
- Housing capacity at Shoreham harbour is significantly greater than 500 homes
- Difficulty of providing 500 homes at Shoreham harbour given infrastructure constraints.
- An allocation in the Shoreham-Lancing Gap would meet requirements of PPS3.
- A Housing Land Availability Assessment is needed as required by PPS3.
- Housing delivery policy is not robust enough to provide new homes in the right locations.

Policy H2 Securing Affordable Homes

- Policy does not accord with PPS3 in terms of the threshold of 10 or more units, – alternatives have not been considered.
- Policy should be more flexible in terms of the amount of affordable housing required. To be subject to negotiation on a site by site basis.

- Definition of affordable housing should reflect that of the South Est Plan and PPS3
- Evidence for the policy is out of date – the housing Strategy is out of date.
- No provision is made for intermediate housing.

Policy H3 Housing Mix, Density and Design

- High density housing may not be appropriate on some sites e.g. conservation areas
- Requirement for all homes to be built to lifetimes homes standards is contrary to PPS1

Policy H4 Accommodating Gypsies and Travellers

- Policy should take into account landscape and AONB impact

Section 12 – Providing for Adur’s Community and Infrastructure Needs

CI1 – Existing and new community, Leisure and Cultural Facilities

- No reference made to the importance of providing further opportunities for quiet, informal recreation in the AONB, of links from the urban area to the countryside or of protecting the amenity of existing recreational facilities, particularly rights of way.
- Policy does not fully acknowledge the visionary roles of Lancing College as identified in the Lancing college Landscape Assessment 2004 – 14
- Existing community facilities should be protected. The test for releasing any community land or buildings surplus to requirements should be tightened further by reference to full market testing.
- No reference is made to places of worship

CI2 – Infrastructure and Planning Obligations

- Policy needs to take account of the fact that infrastructure provision does not, and should not, come solely from the developer. It is not always practical to hold local / county authorities to specific timetables for the provision of infrastructure

Improving Travel and Access in Adur

T1 – Sustainable Transport

- A reference is needed to a Parkway Station as a ‘longer term’ proposal subject to an Environmental Impact Assessment and financial feasibility study.

T2 – Road Infrastructure Requirements

- Unclear how improvements for accessing the port could or would be achieved and their impact on neighbouring authorities
- Policy lacks clarity, it should identify existing deficiencies on the trunk roads and highways

- The strategy should be used to pressure the HA and LHA to provide a district wide improvement strategy
- Should clarify that any contributions from developers will be sought under policy T3
- T2 should refer to road side services and the current lack of them
- Sentence from preferred options regarding WSCC pressurising central government for improvements to the A27 should be re-instated, it's still in the evidence document
- Regards proposed developments close to the A27, a joint working approach is needed to provide a package of measures for managing transport demand and as a last resort funding towards transport infrastructure.
- Further information is needed to supplement the transport study undertaken.

T3 – New Developments and Requirements to achieve Sustainable Transport

- The wording of T3 is inappropriate and suggest a word change (see text)
- Text relating to making efficient use of land and securing a mix of used is poorly explained
- Higher densities in both rural and urban settlements increase the viability of public transport alternatives due to an increase in the population

EWAR

- Couldn't be dealt with by just a DPD, a review of the Core Strategy should be min
- Must be no suggestions of by-passing the new system for a specific scheme
- A specific EWAR policy would provide greater clarity
- At the I&O stage only 20% recorded as a 'do nothing' approach, so surely preferred option is a commitment to delivering a new road
- In view of the delay to traffic, a new junction on the A27 would cause, the Highways Agency would only support EWAR if it removed traffic from the Trunk Road.

Section 14 - Improving Adur's Environment

General

- Section should refer to the need to improve or protect surface water or groundwater quality given that a large area of the district lies within Groundwater Source Protection Zones (SPZs)

Nature Conservation and Biodiversity

- The Core Strategy should have a policy relating specifically to nature conservation and biodiversity rather than just referring to PPS9

ENV1 – Open Spaces Within the Urban Area

- Core Strategy does not make clear what green corridors are and who will bring them about

ENV2 – Sustainable Energy Generation

- Policy should make reference to AONB
- The requirements of this policy could make some schemes unviable, stifling regeneration and preventing important housing sites coming forward. Viability of delivering schemes must be a priority and this should be referred to in the policy
- The requirements for 10% renewables should be deleted and the focus should be on reducing carbon emissions from new buildings
- Planning authorities should not need to devise their own standards for the environmental performance of individual buildings as these are set out nationally through the building regulations. Higher standards for new homes are set out in the Code for Sustainable Homes.

ENV3 – Flood Risk

- Policy would be strengthened by acknowledging that policy NRM3 of the Draft South East Plan will be followed
- The map illustration titled 'Adur: Areas at risk of flooding' adds little value to the section as it is not a definitive representation of all flood risk issues in Adur

ENV4 – Resource Efficient Buildings

- Policy should incorporate the promotion of sustainable infrastructure
- There is no clear evidence to support the reasonableness of a minimum "Very Good" standard for all development. The policy should be revised to refer to achieving at least a pass and should set a target to achieve a "good" standard wherever it can be reasonably achieved
- The BREEAM standard is now obsolete in light of the publication of the Code for Sustainable Homes.
- There should be no potential within the remit of local planning authorities to influence the performance standards of residential development. The issue falls within the remit of building regulations, the Code for Sustainable Homes and the draft timescale for its implementation. As such the policy should be deleted.

ENV6 – Gaps between Settlements

- The linking of landscape character and townscape character is not helpful.
- The last paragraph of the policy should be expressed at the beginning of the policy for the avoidance of doubt.
- The policy should be amended to reflect the fact that Greenfield development may be permitted to provide homes and employment opportunities pursuant to policies R1, E2 and H1.
- It should be recognised that new sites on the edge of the built-up area may also need to be identified to help meet the needs of the sub-region as identified in the Draft South East Plan, not just the needs of the district
- Policy is not in accordance with PPS7 which advises Local Authorities to replace local landscape designations with a criteria-based approach to protecting and managing land use change in and around urban areas.
- Policy is not in accordance with the recommendation of the Panel on the West Sussex Structure Plan that Strategic Gaps in West Sussex should be replaced

by a policy designed to avoid the coalescence of settlements in general without singling out specific areas for protection

- Strategic gaps represent an outmoded policy approach
- The policy is not in accordance with RPG9 which requires LPAs to rigorously assess the function and justification for Strategic Gaps and similar local designations
- The policy places an undue restriction on land within Shoreham Airport which is a sustainable location for new employment related development
- The policy is unnecessary as Policy ENV5 already provides a general policy framework that seeks to protect and enhance the settlement pattern and townscape character of the area in line with the landscape character approach described in PPS7.
- Policy is not consistent with Worthing Borough Council's Preferred Option EN2 which includes a clear statement of the need to develop proposals to help deliver regeneration objectives
- Policy should be clearer about the development potential referred to in the preamble.
- Policy should recognise that for "Land Between Sompting and Worthing" transport improvements could include measures to resolve congestion on the A259 and A27 Trunk Route

ENV7 – The South Downs

- The policy fails to fully acknowledge the Lancing College Landscape Assessment 2004 or the Lancing College Development Strategy 2004-2014
- Policy should take account of the potential need to provide additional water and sewerage infrastructure that may be required within the AONB.

ENV10 – The Built and Historic Environment and Public Realm

- The third paragraph of the policy suggests that the only acknowledged way of identifying enhancement of a Conservation Area is via a Character Appraisal or Management Plan. However, these can take a good length of time and should not be substitutes for action. Schemes to enhance Conservation Areas should be welcomed at the earliest possible date.

Sustainability Appraisal

- No mention of the TRN
- Add additional information on related transport indicators

Adur District Council Core Strategy: Comments Made : Document Order

| Organisation | Forename | Surname | ID S'nes | Pg Paragraph | Comments | |
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| Enplan | Martin | Carpenter | 114 | 9 | 0 General | <p>It is not considered that the Core Strategy is flexible to deal with changing circumstances. For example concerns over whether Shoreham Harbour can contribute to housing provision are realistic and the identification of contingency greenfield sites is not sufficient and does not provide any certainty concerning development of those sites. □ The contingency sites are generally located within strategic gaps and policy ENV6 seeks to protect the existing gaps (for example between Shoreham and Lancing). It is considered that the policy should expressly identify that development within the strategic gap will be acceptable if it is required to meet the needs of the District during the plan period. As drafted the policy is not flexible enough to respond positively to this important issue particularly as it is one of the principal policy's against which development within strategic gaps would be considered.</p> |
| Southern Water | Chris | Kneale | 122 | 4 | 0 General | <p>If you would like a change to this document, what would that change be? □ NECESSARY CHANGES □ Insert new policy (policy text underlined) □ □ Environmental Quality □ Management of the District's environment will be supported by appraisal of development proposals to ensure that they: □ •□ have no adverse effects on water quality, reduce water consumption and minimise flooding □ •□ protect the amenity of residents □ □ REASON FOR CHANGE □ The quality and potential yield of water resources □ Supply of water for public consumption relies on abstraction from groundwater. Pollutants from the built up areas of new development could potentially be carried into groundwater by run-off or seepage, thereby contaminating water supply. □ Protection of water resources is in the public interest and is therefore, in our view, a material consideration in the determination of planning applications. We therefore consider that Adur's Core Strategy should contain a policy to protect the quality and potential yield of water resources. □ Protection of amenity □ As far as we can ascertain, no policy in the Core Strategy protects the amenity of residents. From Southern Water's perspective, consideration of amenity is important in relation to proposals for sensitive development adjacent to wastewater treatment works. □ Southern Water endeavours to operate its wastewater treatment works in accordance with best practice. However, unpleasant odours inevitably arise from time to time as a result of the treatment processes that occur. For this reason, sensitive development such as housing must be adequately separated from wastewater treatment works, to safeguard amenity. The need to separate sensitive development from existing potentially polluting land-uses is recognised in PPS23, Appendix A. □</p> <p>We therefore take the view that the Core Strategy should contain a policy to protect the amenity of residents, to support a more detailed policy in a subsequent Development Plan Document. This policy should permit development adjacent to wastewater treatment works only if the distance between the works and the development is sufficient to allow adequate odour dispersion. □ □ WHY THE CHANGE WILL MAKE THE CORE STRATEGY SOUND □ The quality and potential yield of water resources □ No policy in the Submitted Core Strategy explicitly protects the quality and potential yield of water resources. □ The proposed policy will make the Core Strategy consistent with Planning Policy Statement 23 (PPS23) □ PPS23 Appendix A □ The following matters should be considered in the preparation of development plan documents: □ The potential sensitivity of the area to adverse effects from pollution, in particular reflected in the landscape, the quality of the soil, air, and ground and surface waters, nature conservation (including SSSIs), National Parks, Areas of Outstanding Natural Beauty, Special Areas of Conservation, Special Protection Areas, Wetland of International Importance, agricultural land quality, water supply (Source Protection Zones), archaeological designations and the need to protect natural resources. □ On the basis of national planning policies, we consider that the Adur's Core Strategy should contain a policy which supports, in principle, the quality and potential yield of water resources. This is essential for Southern Water to facilitate delivery and maintain a high level of service to new and existing customers. □ □ Protection of amenity □ Consideration of amenity is important in relation to proposals for sensitive development adjacent to wastewater infrastructure. The proposed amendment will make the Local Development Framework consistent with Planning Policy Statement 23 (PPS23). □ PPS23, Appendix A states that the following matter should be considered in the preparation of development plan documents: □ The need to separate necessary but potentially polluting and other land uses</p> |

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| | | | | | | | (recognising the potential conflict with sustainable development over mixed-use developments) so as to reduce conflicts, for example by identifying where necessary areas around existing sources of pollution (including roads) in which proposed new developments and uses should be carefully considered in terms of their potential as pollution receptors. □ Paragraph 1.23 of Annex 1 states: □ Intending developers and LPAs should also be aware that the effects of odour from sewage treatment works on neighbouring land where people are present may need to be considered. □ We do not anticipate a detailed policy on this subject in the Core Strategy, as the objective of the Core Strategy is to provide an overall strategy for Adur. However, protection of amenity would be sufficiently overarching and enable more detailed policies to come forward in subsequent development plan documents. □ □ |
| Enplan | Martin | Carpenter | 114 | 4 | 0 | General | The Regional Spatial Strategy (South East Plan) requires Adur District to provide 2,600 new homes over the period 2006 - 2026 at an annual average rate of 130 dwellings. Para 41 of PPS3 sets out a national target of at least 60% of new housing to be provided on previously developed land (PDL). The Regional Spatial Strategy advises that the south east is currently providing more than 60% of its housing on PDL. □ In Adur 100% of the District's housing provision is to be provided on PDL and reference is made to Policy LOC1 of the adopted West Sussex Structure Plan. This reliance on PDL land is inconsistent with regional advice and PPS3, which emphasises the need to deliver and meet the housing targets. PDL sites are often small scale and therefore do not secure wider community benefits, for example the provision of affordable housing, for which there is a pressing need within the District. Reference is made to para 11.10 which confirms there is a "significant need for affordable housing...394 affordable homes need to be built per year up to 2011." Whilst the Core Strategy recognises at para 11.6 that unidentified sites may not continue to come forward at past rates, it still proposes a minimum of 500 dwellings from Shoreham Harbour and also proposes a number of school sites to be redeveloped for housing when they are found to be redundant. These presumptions are flawed in terms of the delivery of appropriate levels of housing and it is considered that the Core Strategy does not contain sufficiently robust housing policies to provide new homes in the right locations. The District Council have for many years endeavoured to bring forward major development at Shoreham Harbour; indeed this strategy has essentially allowed the the Council to promote housing provision as 100% on PDL. This strategy has not worked and it is noted that development of circa 500 dwellings still requires appropriate new infrastructure (including acceptable access arrangements) to be in place to enable such development to take place. The provision of this infrastructure is wholly uncertain. □ The Council's housing strategy promotes contingency greenfield sites that are capable of being brought forward for development if monitoring indicates that housing provision is not being delivered at an appropriate rate. In light of the above uncertainty, the Council should not have contingency sites which, for various reasons, may not come forward but should confirm in the Core Strategy the need for non-PDL sites to secure the housing needs of the District. If the problems identified in relation to Shoreham Harbour materialise greenfield sites will need to make up the shortfall. |
| | Robert & P | Brown | 95 | 3 | 0 | General | Process Representation (1) □ □ We wish to make objections/comments on the way the submitted core strategy plan has been prepared ~ □ (Para 2.1 Guidance Notesprocedure). □ We can see no Test for simple error or misinterpretation. We have tried to respond to what we feel the most appropriate ones but will be happy for Planning Officers to reclassify them for the convenience of the Inspector. □ Test 3 Sustainability □ Introduction □ We are owner/occupiers of "Braeside" 26 Fairview Road, Lancing. □ In November 2005, jointly with our neighbours at Hill House, Firl Road and Highview, Mount Way, we submitted to Adur District Council in response to their Core Strategy Consultation Document. a seventeen page document, "Grounds for New Homes at North Lancing" (please see ATTACHMENT 01) □ Our representation identified an area of garden land to the north of Firl and Fairview Roads ripe for development with good housing, the original AONB qualities of the site having been rejected by the Countryside Agency as no longer meeting the criteria for inclusion into the proposed South Downs National Park. □ □ The document was re-presented and re-iterated as part of our further submission upon the June 2006 Draft Core Strategy ~ Preferred Options. □ Inconsistencies in the Urban Fringe Study. □ Having gone to a great deal of trouble to describe the location, history and qualities of this under-used land resource, we were taken aback on examining the Submission Core Strategy (on CD and Website) to find that the plans and aerial photograph of our |

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| | | | | | | | in the area of our land should now be executed and the status of our ownership clearly defined as either Countryside or Built-up Area. We think it should also appear, along with the land blocks to the west (rear of Firle Road), in the forthcoming Site Allocations Policy. □ □ Robert & Pamela Brown 6th March 2007 □ |
| DMH Stallard | C | Barker | 99 | 7 | 0 | General | It is considered that to term Lancing College as a brownfield site in a similar vein to the Shoreham Cement works is questionable and Lancing College should be referred to as 'previously developed land.' |
| | Robert & P | Brown | 97 | 7 | 0 | General | Content Representation (3) □ We wish to make objections/comments on the actual content of the submitted core strategy plan ~ □ (Para 4.1 Guidance Notes.....coherence, consistency and effectiveness). □ □ We can see no Test for simple error or misinterpretation. We have tried to respond to what we feel the most appropriate ones but will be happy for Planning Officers to reclassify them for the convenience of the Inspector. □ Test 7 Robust & Credible Evidence □ Introduction □ We are owner/occupiers of "Braeside" 26 Fairview Road, Lancing. □ In November 2005, jointly with our neighbours at Hill House, Firle Road and Highview, Mount Way, we submitted to Adur District Council in response to their Core Strategy Consultation Document. a seventeen page document, "Grounds for New Homes at North Lancing" (please see ATTACHMENT 01) □ Our representation identified an area of garden land to the north of Firle and Fairview Roads ripe for development with good housing, the original AONB qualities of the site having been rejected by the Countryside Agency as no longer meeting the criteria for inclusion into the proposed South Downs National Park. □ The document was re-presented and re-iterated as part of our further submission upon the June 2006 Draft Core Strategy ~ Preferred Options. □ Inconsistencies in the Urban Fringe Study. □ Having gone to a great deal of trouble to describe the location, history and qualities of this under-used land resource, we were taken aback on examining the Submission Core Strategy (on CD and Website) to find that the plans and aerial photograph of our land, for some reason not disclosed, had been excluded from their focus and apparently totally ignored by the Consultants in the preparation of their Urban Fringe Study ~ chapter 7b[1] #4. (please see ATTACHMENT 02) □ Two land owners to the west seem by implication to have been consulted (Pateman & Garrett) but we received no contact whatever from those involved in the Study (please see ATTACHMENT 03). Had they done so we could have explained to them that access to the eastern most of the two major areas identified, would present both physical, legal and highway difficulties. Piecemeal development, properly advised against elsewhere in the Core Strategy, could have been avoided. □ So forthwith, we drew the anomaly to the attention of the Adur Planning Policy Team and their e.mail reply agreed, □ "that there appears to be an error in the delineation of the eastern boundary of your site as shown in the Urban Fringe Study. The definitive boundary will be that of the 1965 AONB designation." □ They went on to say, □ "The Urban Fringe Study is now complete. It looked, in landscape terms, at the contribution that particular areas of land make to the countryside and □ strategic gaps in the district..... The land north of □ Firle Road was considered, in landscape terms only, to have potential for □ residential development. I would suggest that this equally applies to your □ site." □ □ □ □ Fluidity of adjacent AONB designation. □ Over the years, the delineation of the eastern boundary (in our area) of the 1965 AONB designation appears to have presented some problems. Various documents have drawn it differently, varying from a north/south line abutting the rear of Mount Way, to half way between the gardens of Highview and our own (26) and now, according to UFS Ch 7b [1] #4 (please see again ATTACHMENT 02) it stops at the eastern boundary of "Hill House". □ The interpretation of this line has a very significant bearing on the future use of our, (the representors') property. When the pair were built in 1937, all the land to the north of Nos.24 & 26 Fairview Road was one undivided plot in the occupation of a single family. It was divided longitudinally with a simple chestnut paling fence upon sale, probably in the 1950's, and both sides still retain almost identical garden characteristics. □ Logic dictates that whatever applies to one parcel must apply to the other. For a single strip of garden land, outside a future National Park, to remain an Area of Outstanding Natural Beauty when all about it had been de-designated appeared ludicrous and we felt sure this could not be the real intention. □ □ □ □ □ □ □ Problems defining AONB Boundary. □ We then sought a finite interpretation of this boundary (or an explanation for its westward movement) from the Planning Department. It would appear that an original 1965 AONB Statutory Designation Plan is no longer available. Modern interpretation rests upon a small |

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| | | | | | | | period. It is noted that the Council do not support the East Worthing Access Road (EWAR) to the west of the District which included new employment via a new access road. This further erodes the new employment opportunities for the District and emphasises the need for appropriate provision within the urban area and on the fringes. |
| The Planning Burea | Alexander | Bateman | 82 | 4 | 0 | Section 11 | My Client respectively has concerns in respect to the site thresholds put forward in this Core Strategy Draft. The recently adopted PPS3 indicates: "Set out the range of circumstances in which affordable housing will be required. The national indicative minimum site size threshold is 15 dwellings. However, Local Planning Authorities can set lower minimum thresholds, where viable and practicable, including in rural areas." H2 of the Core Strategy indicates: "In accordance with the requirements of PPS3: Housing, a Strategic Housing Market Assessment will be undertaken in due course which will be taken into account in the monitoring and review of this policy." This highlights to my Client that the decision to indicate a threshold of 10 dwellings is unsound as the research into the Housing Assessment should be conducted first. The thresholds indicated in PPS3 should be followed until research into the Housing Market indicates changes that should be made. |
| RICHARD J MAILE | R J | MAILE | 98 | 5 | 0 | Section 11 | FAILURE TO PROVIDE SUFFICIENT HOUSING. |
| RICHARD J MAILE | R J | MAILE | 98 | 7 | 0 | Section 11 | INSUFFICIENT RECOGNITION OF THE HOUSING SHORTFALL WITHIN THE DISTRICT. |
| RICHARD J MAILE | R J | MAILE | 98 | 9 | 0 | Section 11 | IT FAILS TO TAKE ACCOUNT OF THE INCREASING NEED FOR THE PROVISION OF HOUSING. BULLET POINT 4 OF POLICY H1 SHOULD INCLUDE THE FOLLOWING ADDITIONAL WORDING: "THE COUNCIL MAY CONSIDER THE RELEASE OF SMALLER SITES ELSEWHERE IF THERE IS A NEED IN TERMS OF HOUSING NUMBERS OR THE MIX OF HOUSING TYPES. |
| RICHARD J MAILE | R J | MAILE | 93 | 7 | 0 | Section 11 | INSUFFICIENT RECOGNITION OF THE HOUSING SHORTFALL WITHIN THE DISTRICT. |
| RICHARD J MAILE | R J | MAILE | 93 | 9 | 0 | Section 11 | IT FAILS TO TAKE ACCOUNT OF THE INCREASING NEED FOR THE PROVISION OF AFFORDABLE HOUSING. |
| RICHARD J MAILE | R J | MAILE | 93 | 5 | 0 | Section 11 | FAILURE TO PROVIDE SUFFICIENT AFFORDABLE HOUSING. |
| GTS Planning & Pro | John | Ovenell | 112 | 4 | 0 | Section 12 | Section D11 (Para 11.1) of the South East Plan makes clear "the inevitable need for additional investment in community infrastructure, including places of worship." Para 11.2 makes clear "the variety of mechanisms available to ensure and enhance community infrastructure." It goes on to state that "local assessments of need should be utilised where appropriate to identify gaps in the provision that the development process can then seek to address." Policy S8 states that "the mixed use of community facilities should be encouraged by local authorities, public agencies and other providers, through Local Development Documents and other measures in order to make effective use of resources and reduce travel and other impacts. Creative thinking and action on new mixes of cultural and community facilities is encouraged. Appropriate facilities are made accessible to all sections of the community, in both urban and rural settlements." The West Sussex Structure Plan is in broad agreement with the RSS. Policy NE10 makes clear that "new or improved community facilities and services should be permitted where they meet the identified needs of local communities. Local Plans will include policies to ensure that, where possible, identified needs will be met, including the allocation of land...Where possible new development is located within built-up area boundaries and is of a scale and nature which meets the needs of local people." Paragraph 172 makes clear that places of worship are included within these community facilities and services. Paragraph 177 requires District Planning Authorities to conduct assessments of need, protect facilities of value to local communities, and resist their loss...Additional facilities should be planned for and suitable land provided for them in accessible locations within the built-up area." Para 178 requires that "District planning authorities, with local communities and service providers, should assess the needs of communities for community facilities and |

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| | | | | | | | services."□ Notwithstanding this direction at both the Regional and County levels, the Adur Development Plan makes no reference to places of worship within its Core Strategy or its Community Strategy, as these documents are presently drafted. Consequently no positive proposals exist for their retention or future provision. The Core Strategy and Community Plan thus fall short of regional guidance in these crucial areas.□ The Lancing Congregation of Jehovah's Witnesses, which has for many years been seeking larger premises to satisfy the needs of its members, is willing to take on board the thrust of Regional Guidance by sharing the use of land or new premises with other appropriate community bodies, if this is deemed necessary. □To date, the District Planning Authority has been unable to support various proposals put forward by the Witnesses, and its Core Strategy and Community Strategy, as they are presently drafted, provide no basis for belief that this situation is likely to improve in the future.□ □ |
| Dr N Lyons and Part | Nigel | Lyons | 88 | 0 | 0 | Section 8 | |
| Savills | Simon | Fife | 124 | 9 | 1 | Key Diagram | <p>The identification of Shoreham Airport on the Key Diagram as a major regeneration area and employment area is fully supported; the Airport has the potential to make a significant contribution to economic development in the area as set out in our representations in response to Policy R4.□ Despite its recognition as a major regeneration area and important strategic employment site, the airport is not recognised as part of the urban area on the Key Diagram. A significant level of built development is accommodated within Shoreham Airport's boundary, and the land within the airport's boundary meets the definition of previously developed land set out in Government guidance (land which is occupied by a permanent structure and associated fixed surface infrastructure, including the curtilage of the development). In this context, it is noted that both BAA and Crawley BC agree that Gatwick Airport should be treated as an 'urban area' akin to a settlement for the purposes of defining the Strategic Gap. If this principle were applied to Shoreham, the Airport would be included within the urban area of the town and excluded from any gap policy area. We therefore object to the extent of the 'Urban Area' designation, which should be extended to include Shoreham Airport.□ The 'Gaps between settlements' policy as depicted on the Key Diagram appears to attempt to define a specific boundary for the policy and conflicts with identification of the major regeneration area and employment site policies for the airport. As such the key diagram does not accord with the guidance contained in paragraphs 2.12 – 2.14 of Planning Policy Statement 12: Local Development Frameworks, which states that:□</p> <ul style="list-style-type: none"> •□The core strategy should provide clear and concise policies for delivering the strategy which will apply to the whole of the local planning authority's area or to locations within it, but should not identify individual sites. □ □ •□The Key Diagram should not be used to identify individual sites or policies which need to be defined on a base map. The Key Diagram should illustrate the broad strategy for the area in a diagrammatic format, including general locations for strategic development, major transportation issues, and main patterns of movement and constraints. □ □ •□Policies and proposals in the core strategy provide certainty for the future. □ The 'Gaps between settlements' designation as set out on the Key Diagram also conflicts with guidance at paragraphs 24 and 25 of Planning Policy Statement 7: Sustainable Development in Rural Areas, which recommends a more flexible criteria based approach to local landscape designations. Detailed representations on the gaps between settlements policy are set out in our response to Policy ENV6. In accordance with our representations on Policy ENV6, the 'Gaps between settlements' designation on the Key Diagram should either be replaced by a symbol or redefined to exclude the airport.□ □ |
| Savills | Simon | Fife | 124 | 7 | 1 | Key Diagram | <p>The identification of Shoreham Airport on the Key Diagram as a major regeneration area and employment area is fully supported; the Airport has the potential to make a significant contribution to economic development in the area as set out in our representations in response to Policy R4.□ Despite its recognition as a major regeneration area and important strategic employment site, the airport is not recognised as part of the urban area on the Key Diagram. A significant level of built development is accommodated within Shoreham Airport's boundary, and the land within the airport's boundary meets the definition of previously developed land set out in Government guidance (land which is occupied by a permanent structure and associated fixed surface infrastructure, including the curtilage of the development). In this context, it is noted that both BAA and Crawley BC agree that Gatwick Airport should be</p> |

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- The Key Diagram should not be used to identify individual sites or policies which need to be defined on a base map. The Key Diagram should illustrate the broad strategy for the area in a diagrammatic format, including general locations for strategic development, major transportation issues, and main patterns of movement and constraints. □ □
- Policies and proposals in the core strategy provide certainty for the future. □ The 'Gaps between settlements' designation as set out on the Key Diagram also conflicts with guidance at paragraphs 24 and 25 of Planning Policy Statement 7: Sustainable Development in Rural Areas, which recommends a more flexible criteria based approach to local landscape designations. Detailed representations on the gaps between settlements policy are set out in our response to Policy ENV6. In accordance with our representations on Policy ENV6, the 'Gaps between settlements' designation on the Key Diagram should either be replaced by a symbol or redefined to exclude the airport. □ □

Savills Simon Fife 124 4 1 Key Diagram

The identification of Shoreham Airport on the Key Diagram as a major regeneration area and employment area is fully supported; the Airport has the potential to make a significant contribution to economic development in the area as set out in our representations in response to Policy R4. □ Despite its recognition as a major regeneration area and important strategic employment site, the airport is not recognised as part of the urban area on the Key Diagram. A significant level of built development is accommodated within Shoreham Airport's boundary, and the land within the airport's boundary meets the definition of previously developed land set out in Government guidance (land which is occupied by a permanent structure and associated fixed surface infrastructure, including the curtilage of the development). In this context, it is noted that both BAA and Crawley BC agree that Gatwick Airport should be treated as an 'urban area' akin to a settlement for the purposes of defining the Strategic Gap. If this principle were applied to Shoreham, the Airport would be included within the urban area of the town and excluded from any gap policy area. We therefore object to the extent of the 'Urban Area' designation, which should be extended to include Shoreham Airport. □ The 'Gaps between settlements' policy as depicted on the Key Diagram appears to attempt to define a specific boundary for the policy and conflicts with identification of the major regeneration area and employment site policies for the airport. As such the key diagram does not accord with the guidance contained in paragraphs 2.12 – 2.14 of Planning Policy Statement 12: Local Development Frameworks, which states that: □ •□The core strategy should provide clear and concise policies for delivering the strategy which will apply to the whole of the local planning authority's area or to locations within it, but should not identify individual sites. □ □

- The Key Diagram should not be used to identify individual sites or policies which need to be defined on a base map. The Key Diagram should illustrate the broad strategy for the area in a diagrammatic format, including general locations for strategic development, major transportation issues, and main patterns of movement and constraints. □ □
- Policies and proposals in the core strategy provide certainty for the future. □ The 'Gaps between settlements' designation as set out on the Key Diagram also conflicts with guidance at paragraphs 24 and 25 of Planning Policy Statement 7: Sustainable Development in Rural Areas, which recommends a more flexible criteria based approach to local landscape designations. Detailed representations on the gaps between settlements policy are set out in our response to Policy ENV6. In accordance with our representations on Policy ENV6, the 'Gaps between settlements' designation on the Key Diagram should either be replaced by a symbol or redefined to exclude the airport. □ □

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| Highways Agency | Margaret | Pratt | 129 7 | 5 4.1 | <p>This study identifies the impact of the Adur LDF development on the road network. The HA recognises that the study has been developed as an evidence base for the LDF developments. In this context, the HA has the following comments: □ 1. It is acknowledged that the proposed LDF developments within Adur have been included in the model (paragraph 2.3.1). However, it is the HA's understanding that no consideration has been made of other large developments in neighbouring authorities have been considered. As such there is a concern that the wider traffic implications of such developments, which are not picked up in TEMPRO forecasting, are not reflected in this modelling. □ 2. It is recognised that TEMPRO background growth has been used for the highway network. However, how this was applied requires some clarification. The TEMPRO Guidance Note (April 2006) outlines how to treat any development proposals that are likely to have a significant demand on the road network - please refer to paragraphs 4.34 – 4.39 in the TEMPRO Guidance Note. Additionally, further information is required on how growth on the TRN has been accommodated. □ 3. Figure 5.2 indicates that currently the A27 in Adur is operating under free flow conditions during the AM peak, with the exception of the links to the west of the North Lancing roundabout. It should be noted that several of the junctions (including the north Lancing roundabout on the A27) are currently at capacity, which then causes congestion on the links, which does not appear in the this link based model. The HA would recommend that validation is made of the link impacts on the A27 through queue surveying and that junctions are analysed further through the use of the more detailed modelling described. □ 4. One of the major development proposals affecting the A27 is Shoreham Airport. However, traffic calming and potential improved access from the A27 is considered by the developer to mitigate the impacts of the proposed development. Additionally several public transport measures are proposed to mitigate the increase in congestion experienced as a result of the LDF developments. □ In summary, there are still some matters to be addressed regarding the conclusions of the Adur Strategic Transport Study. We consider that until agreement has been reached on these, the document may not fully meet Tests of Soundness 4 and 7. However, we believe these matters can be addressed and will work with the Council to resolve the issues before the Examination in Public begins. □</p> |
| Highways Agency | Margaret | Pratt | 129 4 | 5 4.1 | <p>This study identifies the impact of the Adur LDF development on the road network. The HA recognises that the study has been developed as an evidence base for the LDF developments. In this context, the HA has the following comments: □ 1. It is acknowledged that the proposed LDF developments within Adur have been included in the model (paragraph 2.3.1). However, it is the HA's understanding that no consideration has been made of other large developments in neighbouring authorities have been considered. As such there is a concern that the wider traffic implications of such developments, which are not picked up in TEMPRO forecasting, are not reflected in this modelling. □ 2. It is recognised that TEMPRO background growth has been used for the highway network. However, how this was applied requires some clarification. The TEMPRO Guidance Note (April 2006) outlines how to treat any development proposals that are likely to have a significant demand on the road network - please refer to paragraphs 4.34 – 4.39 in the TEMPRO Guidance Note. Additionally, further information is required on how growth on the TRN has been accommodated. □ 3. Figure 5.2 indicates that currently the A27 in Adur is operating under free flow conditions during the AM peak, with the exception of the links to the west of the North Lancing roundabout. It should be noted that several of the junctions (including the north Lancing roundabout on the A27) are currently at capacity, which then causes congestion on the links, which does not appear in the this link based model. The HA would recommend that validation is made of the link impacts on the A27 through queue surveying and that junctions are analysed further through the use of the more detailed modelling described. □ 4. One of the major development proposals affecting the A27 is Shoreham Airport. However, traffic calming and potential improved access from the A27 is considered by the developer to mitigate the impacts of the proposed development. Additionally several public transport measures are proposed to mitigate the increase in congestion experienced as a result of the LDF developments. □ In summary, there are still some matters to be addressed regarding the conclusions of the Adur Strategic Transport Study. We consider that until agreement has been reached on these, the document may not fully meet Tests of Soundness 4 and 7. However, we believe these matters can be addressed and will work with the Council to resolve the issues before the Examination in Public begins. □</p> |

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| Savills | Simon | Fife | 124 0 | 5 4.1 | |
| Savills | Simon | Fife | 124 0 | 5 4.2 | |
| Savills | Simon | Fife | 124 0 | 5 4.3 | |
| Savills | Simon | Fife | 124 0 | 5 4.4 | |
| Shoreham Society | Bob | Cranmore | 133 7 | 6 4.5 | In this paragraph, Adur's population is stated to decrease by 0.6% over the next 25 years. In view of the increases in population predicted for the whole of SE England and the pressure of households in Brighton and Hove, and elsewhere, looking for less expensive housing, we consider that the increase of some 13% in housing units in Adur will result in an actual increase in population and not just be caused by a decrease in household size. We would suggest that 6% minimum increase in population be used for planning purposes. The other 7%, which could be seen as local re-housing, would be 4% for affordable housing and 3% for private family housing. □ If the population did not increase (but was only spread out) it would be logical to assume that there would be no increase in congestion or need for facilities, infrastructure or services. This is not a realistic basis for planning. □ |
| Savills | Simon | Fife | 124 6 | 11 5.2 | We support overall provisions of the Spatial Vision for Adur. The 3rd sentence of the vision 'its economy will be thriving with prestigious business firms competing to move here' is supported in particular. This is a key priority for the District, and is emphasised in the draft Regional Economic Strategy and Policy SCT2 of the South East Plan. Shoreham Airport is one of the few locations with the potential to meet demands for higher quality modern floor space in the area. There is currently significant interest from a number of high quality businesses that are looking to re-locate to the airport. □ The 8th paragraph refers to the role of Shoreham Airport as a successful and sustainable General Aviation airport contributing to the economy and a key location for new businesses, including high value firms. This paragraph is fully supported, however it would further benefit by the inclusion of a reference to the Airport's role as a visitor attraction, in line with Policy R4 Shoreham Airport. It is suggested that the sentence is amended to read: □ 'Shoreham Airport will be a successful and sustainable general aviation airport that makes an important contribution to the economy as a key location for new businesses, including high value firms, and fulfils its potential as a visitor attraction.' □ The 9th paragraph refers to improvements to the main access routes such as the A27 and A259. Improvements to these routes, where required, are fully supported. However, whilst it is acknowledged that developers should reasonably and proportionately contribute towards improvements, the Core Strategy should be used to strongly encourage the Highways Agency to address existing deficiencies on the trunk road network in a timescale compatible with the development plan. □ □ |
| Dr Malcolm Bell Ltd | M | Bell | 86 7 | 11 5.2 | In our representations on the Draft Core Strategy Preferred Options Stage in regard to the comparable part of the document, we made what we thought were important and useful points. These have not been followed but we feel they are important to the soundness of the document. □ We said at Representation 1 of the Preferred Option Stage : □ Support for First Two paragraphs. □ Add in 4th para : "Adur is a District with limited available land for development. It cannot afford to waste land. It will make full and effective use of derelict, despoiled, unused or under-used land and buildings." □ [Modelled on Derby and Derbyshire Joint Structure Plan – adopted January 2001 Housing Policy 4]. □ We call attention firstly, please, to the front-end-loaded submissions made in discussions and the overarching points submitted as part of this representation but not pointlessly repeated within each representation. [Note on 1st March : this was one way we tried not to repeat words within each representation but it looks like we may have to carry it into each.] □ We note the new wording, second paragraph, says "historic areas, buildings and features of special interest will be protected but now only improved "where necessary". The recognition given to listed buildings as well as historic areas (which we presume includes Conservation Areas) is good but "where necessary improved" appears to be a variation on the national statutory requirement to "enhance" wherever possible. □ It can be seen that "where necessary" could be interpreted by one person as no more than a sensible statement that areas might be so |

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| DMH Stallard | C | Barker | 99 8 | 11 5.2 | The document fails to indicate how Lancing College will have a wider role within the local community. Lancing College's independently produced Development Strategy 2004-2014 identifies many existing and future community relationships which the college wishes to encourage and pursue. We hope that this is the intended route for such a role. |
| South Downs Joint | N J | Belderson | 106 0 | 11 5.2 | |
| Dr Malcolm Bell Ltd | M | Bell | 86 6 | 11 5.2 | <p>In our representations on the Draft Core Strategy Preferred Options Stage in regard to the comparable part of the document, we made what we thought were important and useful points. These have not been followed but we feel they are important to the soundness of the document. □ We said at Representation 1 of the Preferred Option Stage :</p> <p>□</p> <p>Support for First Two paragraphs. □ Add in 4th para : "Adur is a District with limited available land for development. It cannot afford to waste land. It will make full and effective use of derelict, despoiled, unused or under-used land and buildings." □ [Modelled on Derby and Derbyshire Joint Structure Plan – adopted January 2001 Housing Policy 4]. □ We call attention firstly, please, to the front-end-loaded submissions made in discussions and the overarching points submitted as part of this representation but not pointlessly repeated within each representation. [Note on 1st March : this was one way we tried not to repeat words within each representation but it looks like we may have to carry it into each.] □ We note the new wording, second paragraph, says "historic areas, buildings and features of special interest will be protected but now only improved "where necessary". The recognition given to listed buildings as well as historic areas (which we presume includes Conservation Areas) is good but "where necessary improved" appears to be a variation on the national statutory requirement to "enhance" wherever possible. □ It can be seen that "where necessary" could be interpreted by one person as no more than a sensible statement that areas might be so settled or perfect that no improvement is required. That is hard to imagine in the real world but one can acknowledge the concept. □ Many years experience of planning, however, lead one to be chary of anything which could become used as weasel words or excuses for not seeking the best possible outcome. □ In the present case we also have incoherence between a statutory injunction and national policy which seeks the enhancement of listed buildings and conservation areas and requires special attention to be paid to that and the possible interpretation of this vision which says it is not necessary to improve or enhance (with its implications of needing positive planning) but simply to rely on protectionism. □ The change suggested for discussion is that everything one suspects might be behind that intriguing additional word which is worth having could be gained, without any of the dis-benefits, by saying "wherever possible improved". □ We respectfully submit that the issues raised by us, and the need to provide a suitable visionary framework for derelict and under-used land within a Conservation Area in a South Eastern District with limited land, is of such materiality that it merits oral discussion. We also respectfully submit that the issues involved will benefit from the give-and-take of oral examination. Finally, we respectfully submit that the issues we are raising may be of wide importance to the Core Strategy of the District. □ □ WE UNDERSTOOD THE RUBRIC TO SUGGEST THAT SEPARATE REPRESENTATIONS SHOULD BE ON SEPARATE FORMS. WE HAD PREPARED WHAT IS BELOW SEPARATELY BUT THE ON-LINE FORMAT IS REFUSING TO ACCEPT A SECOND REPRESENTATION ON THE SAME POLICY/PARAGRAPH. □ We call attention firstly, please, to the front-end-loaded submissions made in discussions and the overarching points submitted as part of this representation but not pointlessly repeated within each representation. [Note on 1st March : this was one way we tried not to repeat words within each representation but it looks like we may have to carry it into each.] □ We note in this objection, and it pertains to a number, the points at pages 121-122 of the evidence base regarding the comments by Government Office for the South East. We indeed believe the Spatial Vision and Strategies should be "not ... a list of bland development control policies repeating Government guidance and which are not place-focussed". □ Adur, as a place, is trapped between sea and downs. It has a large number of constraints. Many Authorities feel they have significant constraints but in Adur these truly are so. It cannot afford to waste land. It should be part of the vision that it will make use of its limited available underused land. □ The need for the avoidance of waste land to be part of the Vision relates closely to this paragraph but could sit between paragraphs 3 and 4. We also maintain, however, the point that not all houses would want to be built at that density. Nor will it only</p> |

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| Broadlands Chartere | Paul | Carter | 94 | 7 | 13 | 5.3 | The Strategic Objectives should include a specific reference to meeting the housing needs of the District, as it is not clear whether the Auhtority considers housing is one element of the "social needs" of the community. Clearly providing for housing needs must be a key component of any Core Strategy |
| Dr Malcolm Bell Ltd | M | Bell | 86 | 8 | 14 | 6.1 | □ We are objecting passim, but in particular to the fourth bullet point of the Spatial Strategy.□ In our representations on the Draft Core Strategy Preferred Options Stage in regard to the comparable part of the document, we made what we thought were important and useful points. These have not been followed but we feel they are important to the soundness of the document.□ We call attention firstly, please, to the front-end-loaded submissions made in discussions and the overarching points submitted as part of this representation but not pointlessly repeated within each representation. [Note on 1st March : this was one way we tried not to repeat words within each representation but it looks like we may have to carry it into each.]□ On the rather different layout of the Spatial Strategy at Preferred Option Stage we said : □ Support much of approach but alter last sentence on page 20 to "New homes needed over the next 10 years are to be provided on brownfield, derelict, despoiled, unused or under-used sites within or adjacent to the urban area but ...". □Reason : to avoid over-technical debate about brownfield/greenfield distinctions. It is a policy with real good intent not a Statute to be wrestled over in a legalistic way. Similarly, it would be nonsense to have a strategy which deliberately left a vacant long-term underused site in a sustainable location unused whilst giving preference to – for example – a site with active or potential employment use.□ We note the new approach and in particular the addition of the fact that main broad locations with potential for growth on the edge of the urban area are on land west of Sompting and east of Lancing.□ Firstly there is an important issue of description in order to be site specific to Adur.□ There is an area of largely modern housing called Sompting and there is the old village of Sompting.□ We presume that by "land west of Sompting" the Authority mean the newer housing but this needs to be clear; not least given the point made in a previous representation about the unspecific, non-allocated, non-defined nature of the key diagram's reference to land north of Old Sompting and on the western edge of the District.□ On the key diagram all land along the western edge of New Sompting is shown as part of the gap between settlements, unless some QC were to try to squeeze an argument out of the lack of a triangle in the very corner of the right-angle below the 'g' in Sompting.□ It would seem appropriate to indicate for the 20 year period where broad areas of search for land beyond brownfield should be. □ We argue that before any genuine open greenfields are released then the Spatial Strategy must ensure that derelict and long term under-used land with no viable use at present time is preferred.□ Thus we suggest Bullet 4 could have inserted after "brown field" and before "sites" the words "derelict and under-used".□ We respectfully submit that the issues raised by us, and the need to provide a suitable visionary framework for derelict and under-used land within a Conservation Area in a South Eastern District with limited land, is of such materiality that it merits oral discussion. We also respectfully submit that the issues involved will benefit from the give-and-take of oral examination. Finally, we respectfully submit that the issues we are raising may be of wide importance to the Core Strategy of the District.□ |
| Strutt & Parker | Craig | Noel | 103 | 0 | 14 | 6.1 | |

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|---------------------|-----------------|----------------|-----------------|---------------------|---|
| Broadlands Chartere | Paul | Carter | 94 6 | 14 6.1 | General location of potential Greenfield housing sites to the west of Sompting and east of Lancing should be identified on the key diagram. |
| Broadlands Chartere | Paul | Carter | 94 7 | 14 6.1 | 1) Should acknowledge that Greenfield sites will be needed in the longer term to meet housing requirements. □ 2) There are no grounds to suggest that sufficient Brownfield land can be identified to meet housing requirements throughout the Plan period.□ 3) The strategy should include (a) urban extension/s to broaden/compliment the choice of housing and employment sites, assist in the regeneration of the area and secure the benefits that can arise through the economies of scale, e.g. affordable housing and social infrastructure provision that may not be achieved through the development of smaller sites within the urban area.□ |
| Michael Cox Associa | Michael | Cox | 116 9 | 14 6.1 | Replace reference to Shoreham Harbour for a minimum of 500 new homes with New Monks Farm, Lancing. Indicates that new homes needed over the next 10 years are to be provided on brownfield sites within the urban areas and on greenfield land east of Lancing |
| Michael Cox Associa | Michael | Cox | 116 7 | 14 6.1 | See below |
| Michael Cox Associa | Michael | Cox | 116 4 | 14 6.1 | See below |
| BBP Regeneration | Rob | Bennett | 115 9 | 14 6.1 | See comments relative to Test 7 above. |
| BBP Regeneration | Rob | Bennett | 115 7 | 14 6.1 | □ The Spatial Strategy as outlined in the box on Page 14 is unsound for the same reasons noted in SEEDA's representation on Policy H1. The inclusion of a figure of 500 homes at Shoreham Harbour is premature in light of an ongoing review of the 1999 Shoreham Maritime Vision, and an emerging Delivery Plan for Shoreham Harbour and subsequent Area Action Plan, where a revised quantum of housing will be put forward.□ SEEDA therefore proposes the following change to the Spatial Strategy:□ "• A number of key areas are identified for regeneration and to be accompanied by new infrastructure:□• Shoreham Harbour (for employment, leisure facilities and a significant number of new homes);□• Shoreham Airport (for new employment and as a visitor attraction);□• The Cement works (for new employment, leisure/recreation and tourism uses)..." |
| Dr Malcolm Bell Ltd | M | Bell | 86 6 | 14 6.1 | □ We are objecting passim, but in particular to the fourth bullet point of the Spatial Strategy.□ In our representations on the Draft Core Strategy Preferred Options Stage in regard to the comparable part of the document, we made what we thought were important and useful points. These have not been followed but we feel they are important to the soundness of the document.□ We call attention firstly, please, to the front-end-loaded submissions made in discussions and the overarching points submitted as part of this representation but not pointlessly repeated within each representation. [Note on 1st March : this was one way we tried not to repeat words within each representation but it looks like we may have to carry it into each.]□ On the rather different layout of the Spatial Strategy at Preferred Option Stage we said : □ Support much of approach but alter last sentence on page 20 to "New homes needed over the next 10 years are to be provided on brownfield, derelict, despoiled, unused or under-used sites within or adjacent to the urban area but ...". □ Reason : to avoid over-technical debate about brownfield/greenfield distinctions. It is a policy with real good intent not a Statute to be wrestled over in a legalistic way. Similarly, it would be nonsense to have a strategy which deliberately left a vacant long-term underused site in a sustainable location unused whilst giving preference to – for example – a site with active or potential employment use.□ We note the new approach and in particular the addition of the fact that main broad locations with potential for growth on the edge of the urban area are on land west of Sompting and east of Lancing.□ Firstly there is an important issue of description in order to be site specific to Adur.□ There is an area of largely modern housing called Sompting and there is the old village of Sompting.□ We presume that by "land west of Sompting" the Authority mean the newer housing but this needs to be clear; not least given the point made in a previous representation about the unspecified, |

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| | | | | | | | non-allocated, non-defined nature of the key diagram's reference to land north of Old Sompting and on the western edge of the District. □ On the key diagram all land along the western edge of New Sompting is shown as part of the gap between settlements, unless some QC were to try to squeeze an argument out of the lack of a triangle in the very corner of the right-angle below the 'g' in Sompting. □ It would seem appropriate to indicate for the 20 year period where broad areas of search for land beyond brownfield should be. □ We argue that before any genuine open greenfields are released then the Spatial Strategy must ensure that derelict and long term under-used land with no viable use at present time is preferred. □ Thus we suggest Bullet 4 could have inserted after "brown field" and before "sites" the words "derelict and under-used". □ We respectfully submit that the issues raised by us, and the need to provide a suitable visionary framework for derelict and under-used land within a Conservation Area in a South Eastern District with limited land, is of such materiality that it merits oral discussion. We also respectfully submit that the issues involved will benefit from the give-and-take of oral examination. Finally, we respectfully submit that the issues we are raising may be of wide importance to the Core Strategy of the District. □ |
| Dr Malcolm Bell Ltd | M | Bell | 86 | 7 | 14 | 6.1 | □ We are objecting passim, but in particular to the fourth bullet point of the Spatial Strategy. □ In our representations on the Draft Core Strategy Preferred Options Stage in regard to the comparable part of the document, we made what we thought were important and useful points. These have not been followed but we feel they are important to the soundness of the document. □ We call attention firstly, please, to the front-end-loaded submissions made in discussions and the overarching points submitted as part of this representation but not pointlessly repeated within each representation. [Note on 1st March : this was one way we tried not to repeat words within each representation but it looks like we may have to carry it into each.] □ On the rather different layout of the Spatial Strategy at Preferred Option Stage we said : □ Support much of approach but alter last sentence on page 20 to "New homes needed over the next 10 years are to be provided on brownfield, derelict, despoiled, unused or under-used sites within or adjacent to the urban area but ...". □ Reason : to avoid over-technical debate about brownfield/greenfield distinctions. It is a policy with real good intent not a Statute to be wrestled over in a legalistic way. Similarly, it would be nonsense to have a strategy which deliberately left a vacant long-term underused site in a sustainable location unused whilst giving preference to – for example – a site with active or potential employment use. □ We note the new approach and in particular the addition of the fact that main broad locations with potential for growth on the edge of the urban area are on land west of Sompting and east of Lancing. □ Firstly there is an important issue of description in order to be site specific to Adur. □ There is an area of largely modern housing called Sompting and there is the old village of Sompting. □ We presume that by "land west of Sompting" the Authority mean the newer housing but this needs to be clear; not least given the point made in a previous representation about the unspecified, non-allocated, non-defined nature of the key diagram's reference to land north of Old Sompting and on the western edge of the District. □ On the key diagram all land along the western edge of New Sompting is shown as part of the gap between settlements, unless some QC were to try to squeeze an argument out of the lack of a triangle in the very corner of the right-angle below the 'g' in Sompting. □ It would seem appropriate to indicate for the 20 year period where broad areas of search for land beyond brownfield should be. □ We argue that before any genuine open greenfields are released then the Spatial Strategy must ensure that derelict and long term under-used land with no viable use at present time is preferred. □ Thus we suggest Bullet 4 could have inserted after "brown field" and before "sites" the words "derelict and under-used". □ We respectfully submit that the issues raised by us, and the need to provide a suitable visionary framework for derelict and under-used land within a Conservation Area in a South Eastern District with limited land, is of such materiality that it merits oral discussion. We also respectfully submit that the issues involved will benefit from the give-and-take of oral examination. Finally, we respectfully submit that the issues we are raising may be of wide importance to the Core Strategy of the District. □ |
| Savills | Simon | Fife | 124 | 0 | 14 | 6.1 | |
| Dr Malcolm Bell Ltd | M | Bell | 86 | 9 | 14 | 6.1 | □ We are objecting passim, but in particular to the fourth bullet point of the Spatial Strategy. □ In our representations |

on the Draft Core Strategy Preferred Options Stage in regard to the comparable part of the document, we made what we thought were important and useful points. These have not been followed but we feel they are important to the soundness of the document. □ We call attention firstly, please, to the front-end-loaded submissions made in discussions and the overarching points submitted as part of this representation but not pointlessly repeated within each representation. [Note on 1st March : this was one way we tried not to repeat words within each representation but it looks like we may have to carry it into each.] □ On the rather different layout of the Spatial Strategy at Preferred Option Stage we said : □ Support much of approach but alter last sentence on page 20 to "New homes needed over the next 10 years are to be provided on brownfield, derelict, despoiled, unused or under-used sites within or adjacent to the urban area but ...". □ Reason : to avoid over-technical debate about brownfield/greenfield distinctions. It is a policy with real good intent not a Statute to be wrestled over in a legalistic way. Similarly, it would be nonsense to have a strategy which deliberately left a vacant long-term underused site in a sustainable location unused whilst giving preference to – for example – a site with active or potential employment use. □ We note the new approach and in particular the addition of the fact that main broad locations with potential for growth on the edge of the urban area are on land west of Sompting and east of Lancing. □ Firstly there is an important issue of description in order to be site specific to Adur. □ There is an area of largely modern housing called Sompting and there is the old village of Sompting. □ We presume that by "land west of Sompting" the Authority mean the newer housing but this needs to be clear; not least given the point made in a previous representation about the unspecific, non-allocated, non-defined nature of the key diagram's reference to land north of Old Sompting and on the western edge of the District. □ On the key diagram all land along the western edge of New Sompting is shown as part of the gap between settlements, unless some QC were to try to squeeze an argument out of the lack of a triangle in the very corner of the right-angle below the 'g' in Sompting. □ It would seem appropriate to indicate for the 20 year period where broad areas of search for land beyond brownfield should be. □ We argue that before any genuine open greenfields are released then the Spatial Strategy must ensure that derelict and long term under-used land with no viable use at present time is preferred. □ Thus we suggest Bullet 4 could have inserted after "brown field" and before "sites" the words "derelict and under-used". □ We respectfully submit that the issues raised by us, and the need to provide a suitable visionary framework for derelict and under-used land within a Conservation Area in a South Eastern District with limited land, is of such materiality that it merits oral discussion. We also respectfully submit that the issues involved will benefit from the give-and-take of oral examination. Finally, we respectfully submit that the issues we are raising may be of wide importance to the Core Strategy of the District. □

Dr Malcolm Bell Ltd M Bell 86 6 14 6.2

We call attention firstly, please, to the front-end-loaded submissions made in discussions and the overarching points submitted as part of this representation but not pointlessly repeated within each representation. [Note on 1st March : this was one way we tried not to repeat words within each representation but it looks like we may have to carry it into each.] □ On the Proposals Map to the north of Sompting between Old Sompting Village and the A27 the green arrow should be moved circa 4mm to the east (right). □ The reason is to make it clear that the land in that area does not contribute to the gap between settlements in a useful way. One notes that the land to the west and north of Old Sompting Village does not have any colouring on the map cross-relating to policies. Whilst not part of the existing urban area it is not otherwise defined as anything. This would seem to indicate that there was a greater area of search on land which is in fact more open than the derelict and under-used land to the east. This would be a failure of a spatial vision for the area. It would be a broad-brush approach which was not reflective of the particular spatial characteristics of that part of Adur. □ We respectfully submit that the issues raised by us, and the need to provide a suitable visionary framework for derelict and under-used land within a Conservation Area in a South Eastern District with limited land, is of such materiality that it merits oral discussion. We also respectfully submit that the issues involved will benefit from the give-and-take of oral examination. Finally, we respectfully submit that the issues we are raising may be of wide importance to the Core Strategy of the District. □

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| Dr Malcolm Bell Ltd | M | Bell | 86 | 9 | 14 | 6.2 | We call attention firstly, please, to the front-end-loaded submissions made in discussions and the overarching points submitted as part of this representation but not pointlessly repeated within each representation. [Note on 1st March : this was one way we tried not to repeat words within each representation but it looks like we may have to carry it into each.] On the Proposals Map to the north of Sompting between Old Sompting Village and the A27 the green arrow should be moved circa 4mm to the east (right). The reason is to make it clear that the land in that area does not contribute to the gap between settlements in a useful way. One notes that the land to the west and north of Old Sompting Village does not have any colouring on the map cross-relating to policies. Whilst not part of the existing urban area it is not otherwise defined as anything. This would seem to indicate that there was a greater area of search on land which is in fact more open than the derelict and under-used land to the east. This would be a failure of a spatial vision for the area. It would be a broad-brush approach which was not reflective of the particular spatial characteristics of that part of Adur. We respectfully submit that the issues raised by us, and the need to provide a suitable visionary framework for derelict and under-used land within a Conservation Area in a South Eastern District with limited land, is of such materiality that it merits oral discussion. We also respectfully submit that the issues involved will benefit from the give-and-take of oral examination. Finally, we respectfully submit that the issues we are raising may be of wide importance to the Core Strategy of the District. |
| Dr Malcolm Bell Ltd | M | Bell | 86 | 6 | 15 | 7.1 | We call attention firstly, please, to the front-end-loaded submissions made in discussions and the overarching points |

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| | | | | | | | submitted as part of this representation but not pointlessly repeated within each representation. [Note on 1st March : this was one way we tried not to repeat words within each representation but it looks like we may have to carry it into each.] It says that all policies must be taken into account on particular proposals. We are objecting on Test 6 because this appears to be the one dealing with internal coherence. If it is not please re-allocate this objection to the appropriate test of soundness. There should be clarification as to whether the written word overrides the Key Diagram and whether the vision overrides particular policies which may conflict with it and so forth. We respectfully submit that the issues raised by us, and the need to provide a suitable visionary framework for derelict and under-used land within a Conservation Area in a South Eastern District with limited land, is of such materiality that it merits oral discussion. We also respectfully submit that the issues involved will benefit from the give-and-take of oral examination. Finally, we respectfully submit that the issues we are raising may be of wide importance to the Core Strategy of the District. |
| Alliance Environment | Christian | Holliday | 120 | 0 | 16 | R1 | Regeneratio |
| Broadlands Chartere | Paul | Carter | 94 | 0 | 16 | R1 | Regeneratio |
| Alliance Environment | Christian | Holliday | 109 | 0 | 16 | R1 | Regeneratio |
| Savills | Simon | Fife | 124 | 4 | 16 | R1 | Regeneratio We fully support the promotion of sustainable economic growth and regeneration, and in particular the reference to unlocking the regeneration potential of Shoreham Airport. The inclusion of the reference to unlocking the visitor economy in relation to Shoreham Airport is also welcomed. The final line of the policy that sates "Measures will be required to ensure that the impact of regeneration of the key sites on the environment is minimised" is considered unnecessary and should be deleted. Measures to protect the environment and minimise the impacts of development are included in Policies ENV1 to ENV9 and in national planning guidance. |
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| Broadlands Chartere | Paul | Carter | 94 | 7 | 17 | R2 | Regeneratin Policy should be amended to acknowledge the fact that the regeneration of the Wards in most need is not necessarily dependent alone on development within the Wards. Development in the vicinity of the Wards could also benefit them through the provision of facilities in sustainable accessible locations. |
| BBP Regeneration | Rob | Bennett | 115 | 9 | 18 | 8.5 | Paragraphs 8.5 – 8.6 fail Test of Soundness #9 by not reflecting the changing circumstances surrounding the regeneration of Shoreham Harbour. SEEDA and its consultants, in conjunction with the Port, are currently undertaking a review of the 1999 Shoreham Maritime Vision document referred to in these paragraphs, which will involve a review of employment, housing levels, densities and timing of infrastructure, and which will reflect recent Government guidance on the effective and efficient use of land (PPS3) and Climate Change. By Summer 2007, SEEDA intends to have prepared a new Delivery Plan for Shoreham Harbour which will supersede the framework as outlined in para 8.5, as well as the specific dimensions referred to in para 8.6. SEEDA therefore proposes the following changes to paras 8.5 – 8.6: 8.5 In 1999 the Shoreham Maritime Vision was produced which provided a strategic long-term framework for the harbour. SEEDA and the Port are currently undertaking a review of the Vision which will include a review of port activities, future employment opportunities, housing levels, densities and timing of infrastructure. 8.6 The revised Vision will outline a comprehensive scheme which will include the consolidation of port uses, a mix of uses including leisure in different zones, land reclamation, waterfront |

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| | | | | | improvements, new public transportation initiatives and a new access road to the A270."□ |
| Strutt & Parker | Craig | Noel | 103 4 | 18 8.6 | Operational wharves are a rarity in South East England and should be protected to facilitate short sea shipping. The consolidation of port uses should retain wharf frontages together with an appropriate working hinterland for port-related activities. Non port related uses should only be considered where there are clear operational reasons why the wharves cannot be used for sustainable transport of goods/materials. □ |
| Strutt & Parker | Craig | Noel | 103 7 | 19 8.10 | The policy framework for Shoreham Airport should be driven by the wishes of the community. The preamble to the policy should be amended accordingly. |
| Strutt & Parker | Craig | Noel | 103 0 | 19 8.11 | |
| Strutt & Parker | Craig | Noel | 103 0 | 19 8.8 | |
| South Downs Joint | N J | Belderson | 106 4 | 19 8.9 | Growth in Aviation at Shoreham is contrary to Policy Response P3.7 (Growth in aviation) of the South Downs Management Plan Consultation Draft (June 2006). The Policy Response seeks to ensure that there is no further increase in noise (over 2005 levels) from aviation over the South Downs. Para 3.3.1 of the Draft Management Plan states "Growth in aviation is a further threat to the peace and serenity of the South Downs..." |
| Broadlands Chartere | Paul | Carter | 94 7 | 19 R3 Shoreham | Policy should be recast to ensure that development proposals will only be permitted if demonstrated to be acceptable in terms of flood risk. As drafted the policy implies that development will be permitted and flood risk mitigated. This suggests that the guiding principle of the policy is mitigation rather than avoidance of flood risk. |
| Environment Agency | Emma | Winchester | 100 7 | 19 R3 Shoreham | In previous comments on both your Issues and Options and Preferred Options stages of your Core Strategy we highlighted our concerns regarding the future development proposed at Shoreham Harbour. These concerns related primarily to flood risk, land contamination and the provision of sewage infrastructure. We are now satisfied that there is a strong awareness of land contamination issues and the need to provide adequate environmental infrastructure prior to development at this site. These issues will be further addressed through the Joint Area Action Plan for the Harbour to be undertaken in conjunction with Brighton & Hove City Council as well as the planning application process. □ However we have remaining concerns relating to flood risk at Shoreham Harbour and these are detailed below. □ Flood Risk □ Planning Policy Statement 25: Development & Flood Risk (PPS25, December 2006) requires that a Strategic Flood Risk Assessment (SFRA) is carried out by Local Planning Authorities (LPAs) to inform the preparation of their Local Development Documents (LDDs). Furthermore, PPS25 puts the onus on the LPA to apply the sequential test in order to ascertain the best location for proposed growth areas in the District and to ensure that there are no other sites with a lower probability of flooding where development would be more appropriate. □ We are aware that a SFRA is being produced jointly for Adur and Worthing and that Phase 1 of this has now been completed. During recent discussions you have stated that you expect Phase 2 of your SFRA to be completed by the end of March 2007 and that this will be used to inform your Site Allocations Development Plan Document (DPD). □ We commend you on the progress you have made with your SFRA and note that as the Statutory Consultee for flood risk we look forward to becoming more involved in this process. We are aware that colleagues from our Development Control and Flood Risk team are attending a meeting on the SFRA on 15th March and we welcome this involvement. It may be possible that a number of issues relating to the role of the SFRA in assessing the development potential of Shoreham Harbour may be addressed at this meeting. □ Regardless of the fact that Phase 1 of the SFRA has now be completed, it is not clear throughout either the Core Strategy or the Sustainability Appraisal how the SFRA has informed the Core Strategy and whether reasonable alternatives for development sites have been considered. Certainly from the information made available to us, it does not appear that alternatives have been considered and disregarded at an earlier stage. More specifically, there is no evidence that the sequential test has been applied to the selection of broad locations. It therefore remains unknown whether there are other sites appropriate for development where there is less risk of flooding. □ We note that reference is |

made to the allocation of Shoreham Harbour for 500 homes in the Draft South East Plan and appreciate that this applies significant pressure for the Local Planning Authority. However our position is that although the delivery of this amount of homes at this location may in fact be feasible (depending on the outcome of the SFRA phase 2) there is not yet adequate evidence available to confirm this. Further information and assessment is also required to identify how flood risk at this site may be managed and mitigated. □ On page 7 of the Evidence Base for 'R3 Shoreham Harbour' it is stated that parts of the port land is within Flood Zones 3a – 'High Probability' and 3b - 'The Functional Floodplain'. It is later asserted that "the exceptions test could be met as Shoreham Harbour is an area identified to bring significant regeneration benefits to Adur and the wider sub-region". □ We note that this statement is incorrect as PPS25 clearly states that only 'water compatible development' (Table D.2) is appropriate within Zone 3b, while 'essential infrastructure' will require the exception test to assure appropriateness. While some components of the development proposed at Shoreham Harbour may fall under 'water-compatible development', any developments classified as either 'highly', 'more' or 'less' vulnerable in Table D.2 should not be permitted in zone 3b. This includes the majority of mixed-use development types proposed as part of the regeneration of Shoreham Harbour. □ Furthermore, paragraph 3.17 of 'Development and Flood Risk: A Practice Guide Companion to PPS25' states that "all areas within Zone 3 should be considered as Zone 3b (Functional Floodplain) unless, or until, an appropriate FRA shows to the satisfaction of the EA that it can be considered as falling within Zone 3A (High Probability)". □ With regards to determining areas within Flood Zones 3a and 3b, it will be necessary to complete Phase 2 of a SFRA as the completed Phase 1 Assessment does not provide this level of detail. It is possible that the completion of more detailed stages of your SFRA may conclude that the majority of the Shoreham Harbour is within Flood Zone 3a and the exception test will then need to be applied to assess land suitable for development. However, without this evidence it is imperative that a precautionary and risk-based approach is taken and we therefore have no option but to object in principle to the allocation of Shoreham Harbour as a site appropriate for the development of 500 homes. □ Biodiversity □ We note that the Core Policy on Nature Conservation and Biodiversity has now been deleted following advice from the Government Office of the South East (GOSE). While we have no major objection to this, we highlight that it is essential that the principles of 'Planning Policy Statement 9: Biodiversity and Geological Conservation' (PPS9) as well as NRM4 of the Draft South East Plan are taken into account and applied throughout the implementation of the Core Strategy. □ Throughout section 14 there is frequent reference made to the need to protect and enhance the quality of the environment as well as specific reference to biodiversity and habitat creation in some policies. We are therefore satisfied that the principles of PPS9 have been adequately addressed throughout the core policies and background text relating to the environment. □ There is a slight inconsistency between the way biodiversity and nature conservation is addressed throughout the RG3, RG4, RG5. All of these policies include reference to 'environmental improvements' or 'minimising and/or enhancing the quality of the environment'. R4 on Shoreham Airport goes further to state 'particularly in respect of flood risk and nature conservation and biodiversity'. We realise that policies are interdependent and should be read as a whole, however there is a risk that some readers may interpret this to mean that nature conservation and biodiversity should only be considered at Shoreham Airport. While we appreciate this is an area of high value and vulnerability as well as potential for enhancement, nature conservation and biodiversity considerations should also be addressed throughout the regeneration proposed at both the Harbour and Cement Works. □ We therefore suggest that the following wording is added to R3 and R5: □ R3 (to follow on from the end of paragraph 4)"...flood risk and nature conservation and biodiversity. □ - R5 (to follow on from bullet point 4) "... any environmental impacts (including nature conservation and biodiversity). □ We also emphasise that it is essential for nature conservation and biodiversity to be incorporated into your emerging Development Control Policies SPD. □ Test 7 (relating to flood risk concerns only) □ As highlighted by our comments above, our greatest concern relating to the identification of Shoreham Harbour as a site for development is that this is not founded on a robust and credible evidence base as required by Test 7. □ There is no evidence throughout the Sustainability Appraisal that alternative sites have been considered or that the SFRA has in fact been used to inform the assessment process leading to the selection of Shoreham Harbour. As required by PPS25, it is fundamental that the SFRA forms an integral part of the Sustainability Appraisal. However, to our knowledge the SFRA has been produced retrospectively to the preparation

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| | | | | | | | of the Core Strategy and therefore assesses only those options already assumed to be appropriate for regeneration in the Core Strategy. This suggests that the sequential test has not been applied (as above in Test 4). □ As stated previously we acknowledge that the identification of the Shoreham Harbour within the Draft South East Plan puts Adur District Council in a difficult situation, however this should not excuse the site from being subject to the required assessment procedures. Rigorous assessment of this site will also help to identify appropriate mitigation and management of the flood risk at this strategic location. □ While it is acknowledged that the site includes areas classified as Flood Risk Zones 3a and 3b, it is not yet possible to determine the actual amount within each of these zones. Therefore in this case, guidance suggests that all of this area is considered to be within Flood Zone 3b and consequently not appropriate for the type of regeneration development proposed until proven otherwise. □ □ | |
| Brighton & Hove City | Michael | Holford | 102 | 6 | 19 | R3 | Shoreham | The City Council confirms that ongoing discussions are taking place with the District Council and other bodies including SEEDA and the Port Authority over the regeneration of the Harbour area. This includes a commitment to produce a joint area action plan. However, the City Council considers that in addition to the transport impacts of proposals in the short term, policy R3 should include consideration of how any such proposals might impact on the long term plans for the harbour such as by reducing the amount of land available to implement any long term vision. Such an approach would accord with Preferred Option SH1 on page 114 of the Brighton & Hove Core Strategy - preferred options document published in October 2006. The preparation of a joint Area Action Plan by the two Councils should aid clarification of this point. □ The City Council also has some concern about the level of development that could potentially be permitted under Policy R3 and the impacts on the existing transport network. It is noted that more details about the scale of development will be set out in a Planning Advisory Note. However, the Core Strategy should be more explicit about the transport impacts that will be acceptable or not. In particular there is a lack of clarity about the transport impacts in neighbouring authorities that would be considered acceptable under R3. For example, the Brighton and Hove Local Plan policy EM12 specifies that development of port related activities should not add to the environmental disadvantages suffered as a result of HGV traffic passing along the roads used for port access. |
| Environment Agency | Emma | Winchester | 100 | 4 | 19 | R3 | Shoreham | In previous comments on both your Issues and Options and Preferred Options stages of your Core Strategy we highlighted our concerns regarding the future development proposed at Shoreham Harbour. These concerns related primarily to flood risk, land contamination and the provision of sewage infrastructure. We are now satisfied that there is a strong awareness of land contamination issues and the need to provide adequate environmental infrastructure prior to development at this site. These issues will be further addressed through the Joint Area Action Plan for the Harbour to be undertaken in conjunction with Brighton & Hove City Council as well as the planning application process. □ However we have remaining concerns relating to flood risk at Shoreham Harbour and these are detailed below. □ Flood Risk □ Planning Policy Statement 25: Development & Flood Risk (PPS25, December 2006) requires that a Strategic Flood Risk Assessment (SFRA) is carried out by Local Planning Authorities (LPAs) to inform the preparation of their Local Development Documents (LDDs). Furthermore, PPS25 puts the onus on the LPA to apply the sequential test in order to ascertain the best location for proposed growth areas in the District and to ensure that there are no other sites with a lower probability of flooding where development would be more appropriate. □ We are aware that a SFRA is being produced jointly for Adur and Worthing and that Phase 1 of this has now been completed. During recent discussions you have stated that you expect Phase 2 of your SFRA to be completed by the end of March 2007 and that this will be used to inform your Site Allocations Development Plan Document (DPD). □ We commend you on the progress you have made with your SFRA and note that as the Statutory Consultee for flood risk we look forward to becoming more involved in this process. We are aware that colleagues from our Development Control and Flood Risk team are attending a meeting on the SFRA on 15th March and we welcome this involvement. It may be possible that a number of issues relating to the role of the SFRA in assessing the development potential of Shoreham Harbour may be addressed at this meeting. □ Regardless of the fact that Phase 1 of the SFRA has now been completed, it is not clear throughout either the Core Strategy or the Sustainability Appraisal how the SFRA has informed the Core Strategy and whether reasonable alternatives for development sites have been considered. Certainly from the information made available to us, it does not appear |

that alternatives have been considered and disregarded at an earlier stage. More specifically, there is no evidence that the sequential test has been applied to the selection of broad locations. It therefore remains unknown whether there are other sites appropriate for development where there is less risk of flooding. □ We note that reference is made to the allocation of Shoreham Harbour for 500 homes in the Draft South East Plan and appreciate that this applies significant pressure for the Local Planning Authority. However our position is that although the delivery of this amount of homes at this location may in fact be feasible (depending on the outcome of the SFRA phase 2) there is not yet adequate evidence available to confirm this. Further information and assessment is also required to identify how flood risk at this site may be managed and mitigated.□ On page 7 of the Evidence Base for 'R3 Shoreham Harbour' it is stated that parts of the port land is within Flood Zones 3a – 'High Probability' and 3b - 'The Functional Floodplain'. It is later asserted that "the exceptions test could be met as Shoreham Harbour is an area identified to bring significant regeneration benefits to Adur and the wider sub-region". □ We note that this statement is incorrect as PPS25 clearly states that only 'water compatible development' (Table D.2) is appropriate within Zone 3b, while 'essential infrastructure' will require the exception test to assure appropriateness. While some components of the development proposed at Shoreham Harbour may fall under 'water-compatible development', any developments classified as either 'highly', 'more' or 'less' vulnerable in Table D.2 should not be permitted in zone 3b. This includes the majority of mixed-use development types proposed as part of the regeneration of Shoreham Harbour. □ Furthermore, paragraph 3.17 of 'Development and Flood Risk: A Practice Guide Companion to PPS25' states that "all areas within Zone 3 should be considered as Zone 3b (Functional Floodplain) unless, or until, an appropriate FRA shows to the satisfaction of the EA that it can be considered as falling within Zone 3A (High Probability)". □ With regards to determining areas within Flood Zones 3a and 3b, it will be necessary to complete Phase 2 of a SFRA as the completed Phase 1 Assessment does not provide this level of detail. It is possible that the completion of more detailed stages of your SFRA may conclude that the majority of the Shoreham Harbour is within Flood Zone 3a and the exception test will then need to be applied to assess land suitable for development. However, without this evidence it is imperative that a precautionary and risk-based approach is taken and we therefore have no option but to object in principle to the allocation of Shoreham Harbour as a site appropriate for the development of 500 homes. □ □Test 4 □ Throughout the Core Strategy and Sustainability Appraisal, there is no evidence that the sequential and exception tests have been applied to inform the location of development at Shoreham Harbour. Policy R3 is therefore inconsistent with PPS25 and consequently does not meet the requirements of Test 4. Furthermore, no justification has been given for this policy not complying with National Policy (PPS25). □ □Changes/Amendments Required to Resolve Objection:□ As discussed at our meeting on 8 March 2007, the completion of the phase 2 SFRA will be required in order to satisfy the soundness of Shoreham Harbour for the development of 500 homes. According to your timetable for your SFRA, it is likely that this will be achieved by 30 March and therefore prior to the Examination in Public. It is not until this development has been rigorously assessed and justified however that Policy R3 can be considered 'sound'.

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| BBP Regeneration | Rob | Bennett | 115 | 9 | 19 R3 Shoreham | SEEDA believes that Policy R3 fails Test of Soundness #9 by not being sufficiently flexible to meet the changing circumstances surrounding the regeneration of Shoreham Harbour. The Policy refers to the objectives of the Shoreham Maritime Vision, which was released in 1999 and is currently being revised by SEEDA and its consultants, in conjunction with the Port, involving a review of employment, housing levels, densities and timing of infrastructure.□ SEEDA therefore proposes the following change to Policy R3:□ "...Prior to securing significantly improved infrastructure, it is proposed to permit development within the harbour area that is broadly in line with the emerging regeneration objectives of the revised Shoreham Maritime Vision, recognising the important role of the port and its need for further investment and enhancement. These are developments that can be implemented without the need for major transport improvements. A Planning Advisory Note will be produced to provide details about the scale and type of development that will be permitted..."□ |
| South Downs Joint | N J | Belderson | 106 | 6 | 19 R3 Shoreham | The general principles of this Policy are supported by the South Downs Joint committee. However, no reference is made to the identification of the Harbour as a potential site for wind turbines in the Brighton & Hove Site Allocations Issues and Options paper. If Brighton and Hove commits to the use of wind turbines to provide renewable energy, |

then it would be preferable (in landscape terms) to locate such turbines on Shoreham Harbour, rather than the northern urban fringe. Failure to mention this option may compromise the potential for turbines to be located on the Harbour. Additionally, the potential of the Harbour to provide loading facilities for the carrying of waste by sea to the proposed new incinerator at Newhaven Harbour should not be compromised.

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| Savills | Simon | Fife | 124 | 7 | 19 R4 Shoreham A | <p>Regeneration and new employment We fully support the identification of the airport as a key location for regeneration and new employment. This is consistent with the airport operator's vision to create a successful and sustainable airport catering for modern aviation and business needs alongside a vibrant visitor attraction with high quality buildings and public spaces. The reference in Policy R4 to 'additional development land' is particularly important as the adopted Local Plan limits new buildings to a zone along the southern boundary of the airport, which now has limited potential for further development. There is significant potential for new employment related development within the airport boundary on land currently allocated for employment purposes in the adopted Local Plan (Policies AE11 – AE14), but outside the existing building zone. Additional employment development will allow the airport operator to invest to underpin the airport's future and will assist in the economic revitalisation of the area consistent with regional economic (RES) policy and spatial planning (RSS) policy. In line with our representations on Policy E2, it is considered that the airport is a brownfield site as it meets the definition of previously developed land set out in Government guidance in PPS3 (land which is occupied by a permanent structure and associated fixed surface infrastructure, including the curtilage of the development). This conclusion is reinforced by the findings of the Crawley Borough LDF Core Strategy Evidence Base, which identifies Gatwick Airport, including the runway and related taxiing and grassed areas, as previously developed land. As noted in our representation on the Key Diagram, BAA and Crawley BC consider Gatwick Airport as an 'urban area'. This would benefit from clarification, with the addition of the following text to paragraph 8.8: "In accordance with the Government's definition of previously developed land, Shoreham Airport is considered a brownfield site." Airport related businesses The policy approach to the airport has changed from supporting 'High quality and airport related businesses' in the preferred options consultation (this was supported by the airport owner) to a more restrictive wording in Policy R4, which limits new businesses to 'mainly high-quality airport related businesses, and small-scale ancillary uses'. It is unclear why this change has been made. Whilst the airport is keen to attract high quality airport related businesses, there are also considerable advantages to co-locating non-aviation businesses at the airport that should not be overlooked. The airport is one of the few locations with the potential to meet demands for higher quality modern floor space in the area; it is identified in the Adur Employment Land Study as the most attractive potential development location in the District. We therefore object to this policy wording as it is unclear and represents an unnecessary restriction on the economic potential of this key regeneration site. Evidence in support of a less restrictive approach in line with the preferred options consultation document is set out in the following paragraphs. The Government's White Paper on air transport (The Future of Air Transport, 2004) recognises Shoreham Airport as a second tier airport where Commercial and Business Aviation are to be encouraged. The White Paper sets a positive and ambitious policy direction for second tier airports – it highlights the case for co-locating business and airports, stating that: "Airports...attract business and generate employment and open up wider markets. They can provide an important impetus to regeneration and a focus for new commercial and industrial development...Many airports increasingly act as a focal point for 'clusters' of business development." The recently published Eddington Transport Study recognises that the service sector and international trade are of growing economic importance to the UK, and highlights the need to facilitate the trade of goods and services through key ports and airports, noting that The European Council of Transport Ministers cite airport and port infrastructure as one of the critical success factors for economic growth, business location decisions and tourism. A recent report by York Aviation for the Airport Operators Association points towards the presence of an airport as a major locational draw for business. A report by Oxford Economic Forecasting highlights the important contribution that aviation makes to the UK economy by helping other sectors to operate more efficiently and to compete in the global economy, supporting productivity and economic growth across UK as a whole. Key points highlighted in the report include: Air services are particularly important for UK trade with fast-growing emerging economies, such as China, and for trade in high value goods and services. Air services are</p> |
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very important for the growth sectors on which the UK's future economic success will depend, such as high-tech companies and financial & business services. A quarter of companies report that access to air services is important in determining where they locate their operations in the UK. Implementing the proposals in the government's airports White Paper would generate substantial wider economic benefits. The restrictive approach to employment development at the airport proposed in Policy R4 is considered to be inconsistent with the following policies in the draft South East Plan: Policy SCT2 highlights the need for a step change in the economic performance of the Sussex Coast Sub-region and directs measures to promote economic and social regeneration to the areas of greatest need, including Shoreham. Policy SCT3 identifies the need to find innovative ways of delivering employment land including mixed uses, and refers to the need for a delivery mechanism to unlock and implement sites with economic development potential including Shoreham Airport. Policy SCT6 aims to capitalise on strategic port and airport opportunities at Shoreham. Policy E2 notes the marginal viability of many identified employment sites; this may require the introduction of mixed uses to help fund provision of employment. In view of the evidence supporting the benefits that can arise from co-locating business and airports, along with the need to support the regeneration and economic growth of the Sussex Coast sub-region, it is considered important that the core strategy does not seek to restrict the type of employment at the airport. Mixed-use development The policy would be further strengthened by an additional sentence at the end of the fourth point to encourage mixed-use development around the existing terminal building that will enhance the airport's role as a visitor attraction and help bring forward employment development, consistent with Policies E2 and EM3. Transport improvements In terms of transport improvements to support development, in line with current best practice, Erinaceous will assess the surrounding local transport network and consider a range of infrastructure and transport measures to mitigate the transport impacts of development. The proposed solutions will depend on the quantum and intensity of development proposed and the resulting traffic and trip impacts of the development.

Gaps between settlements The last paragraph of Policy R4 in relation to retaining the gap between Shoreham and Lancing is considered unclear as the policy seeks to preserve the open area of land between Shoreham and Lancing at the same time as allocate the airport as a location for additional employment land. Detailed comments on the gaps between settlements policy have been made in our representations to Policy ENV6. The policy approach is considered to be at variance with the approach to local landscape designations set out in PPS7, and conflicts with Policies SCT3, SCT4, SCT6 and E2 of the draft South East Plan. In particular, Policy SCT4 recognises that some infringement of environmental constraints may be needed in order to deliver priority employment allocations. Policy R4 should be amended to refer to retaining an area of open land between Shoreham and Lancing to ensure the separate identity and character of these settlements. Such an approach would be consistent with Policy ENV6 which states that the size of the gap will be no greater than is necessary to maintain the identity of the settlements and to prevent their coalescence. Changes sought On the basis of the above representations, we seek the following changes to Policy R4 Shoreham Airport: "The airport will be a key location for regeneration and new employment with additional development land for mainly high-quality employment, airport related businesses, and small-scale ancillary uses. It is proposed to support The role of the airport as a centre of General Aviation, commercial and business travel, and as a visitor attraction will be supported. Sustainable transport improvements will be needed as well as measures to mitigate traffic impacts. High quality design of buildings and public spaces will need to be secured and account taken of the listed Terminal Building. Mixed use development around the terminal building will be supported where it will enhance the airport's role as a visitor attraction and help to deliver employment development. Measures will be sought to enhance the quality of the environment in the airport area and to mitigate the environmental impacts of development, particularly in respect of flood risk, nature conservation and biodiversity. Any new development within the gap at the airport must not conflict with the principle of retaining the an open area of land between Shoreham and Lancing to ensure the separate identity and character of these settlements."

Communities Against JP / J Pirault / Kitc 131 9 19 R4 Shoreham A 1 "Sustainable Transport will be established " (Tests 3, 7, 8 & 9). Can this really be feasible when probably less than 0.1% of the UK's transport uses sustainable fuels, and there is not even any national plan making any

claims for fuel energy sustainability in the transport segment? This is a totally misleading word and probably an unattainable target. □ If “sustainable” refers to reduced traffic congestion inspite of increased activity, then this target is again questioned because the very nature of the increased use of the airport will induce much traffic that cannot readily be handled by rail, public road transport or bicycle. This traffic would cover industrial shipments of fuel, heavy goods, materials and the ubiquitous private car, well known to every developing airport. Where are the coherent plans to solve either the A27 or A259 road congestion problems that have existed for at least 10 years? Where is the timeline and information showing when these plans can be proposed, how long they will take to implement and how they will be financed? □ If “sustainable” refers to the carbon dioxide, oxides of nitrogen, carbon monoxide or hydrocarbon emission footprint or ecological status of the airport, then certainly none of these aspects is likely to be even sustained at today’s levels. How can the projected situation be “sustainable”, with plans for over 200 plane movements each calendar day of the year, increased industrial activities, increased transport, more non-degradeable toxic fluids in use, increased effluents from the industrial buildings and a general increase in human waste of all types? □ “Sustainable” is a fashionable, nice to use, “wishing” word and probably in this case an unattainable target. □ It is considered unsound and misleading to suggest that there can be a sustainable transport policy and the almost impossibility of sustainable local transport, certainly in the next 20 years, makes it unlikely to be supported by a robust plan. It should therefore be highlighted that the “sustainable transport” target of R4 is unobtainable in the foreseeable future, and probably will remain unobtainable until there is a change in regional, national and international policies and implementation. Let’s be realistic ADC! □ 3 □ “The gap will be retained”. (Tests 7, 8 & 9) How can the gap be retained if there is internal growth in the airport? A link road, a railway halt, more buildings, lorry parks, car parks, more visitor amenities, the recently built new access road on the northern side, fuel farms, aircraft parking aprons, hangars etc all peripherally reduce the gap, ie the existing green space is physically reduced. Is this true or not true? Yes, the Adur River boundary and the Lancing eastern boundary won’t physically move, but the bit in between will be gradually filled by development, if only to help meet the employment and regeneration policies espoused in the regeneration plan. □ Again, “retaining the gap” seems in conflict with the very nature of growth, unless all the growth is to take place within the existing buildings. □ Hence, retaining the gap is considered an unsound, unrealistic and misleading target. Some honest factual statements and provisional plans on the intended or potential building development should be made available. □ 4 □ “New developments will mitigate the risk of flooding at the airport”. (Tests 7, 8 & 9). The feasibility of this target is questioned. To date, there has been little success in mitigating flooding on the western and northern sides of the airport and in some roads in Lancing where flooding remains a frequent issue. With increased buildings, projected higher water levels due to global warming, and more forecasted variable tropical style rainfalls (again due to climate changes), what can ADC or Erinaceous offer to cope with these natural effects? Providing a flood warning scheme will not stem the flood; it only offers a menu driven telephone helpline without any sandbags (we know, from already being in the “Scheme”). Increasing flood proofing of buildings mitigates the damage, but not the event, nor the inconvenience and nor the loss of business. Sinking more concrete foundation rafts, whilst helping to keep the buildings “afloat”, will reduce the availability of land to soak and drain water, and will therefore accentuate any increase in water levels. Have ADC modelled or simulated the predicted effects of the added roads, buildings, sewage on the local and adjacent watertables? □ □ The evidence provided by ADC and Erinaceous to support this target does not address the fundamental issue of the airport area being readily waterlogged, an effect which will tend to become worse with the anticipated climate change, and with displacement of the natural draining environment by concrete building rafts and roads □ In summary, we feel the Airport Development (R4) targets are essentially wishful thinking and should either be more carefully identified so that they are attainable, or fundamentally reconsidered if the transport, environment, gap encroachment and flood susceptibility issues cannot be practically addressed before commencement of any work. In some cases, the targets are very misleading; please engage in plain factual speaking. □ In evidence to ADC, there has been a continuous road traffic problem along the A259 between the roundabout (Beach Access) on the western side of the Norfolk Bridge and the ADC offices on the eastern side (Ham Road area) for at least 10 years; NOx emission levels along this section of road are believed to be outside the allowed standards. This problem has been under the very noses of the ADC, without resolution and is

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| Communities Against | JP / J | Pirault / Kitc | 131 | 8 | 19 | R4 Shoreham A 1 | <p>evidence that the ADC has not been able to resolve traffic issues. With this fact and experience in mind, what confidence can we have in ADC's ability to cope with the traffic issues and emissions associated with airport expansion? We look forward to ADC's response. We do not feel qualified to make suggestions due to our limited knowledge of planning laws and procedures, but are very willing to act as sanity checkers and positive critics. Like ADC, we are interested in the "regeneration" of the locality, but not at expense of existing good features. Whilst this letter is from the undersigned, we believe it reflects the views of many of the ~300 members who subscribe and support the Lancing/Shoreham-by-Sea CARE campaign.</p> <p>1 "Sustainable Transport will be established " (Tests 3, 7, 8 & 9). Can this really be feasible when probably less than 0.1% of the UK's transport uses sustainable fuels, and there is not even any national plan making any claims for fuel energy sustainability in the transport segment? This is a totally misleading word and probably an unattainable target. If "sustainable" refers to reduced traffic congestion inspite of increased activity, then this target is again questioned because the very nature of the increased use of the airport will induce much traffic that cannot readily be handled by rail, public road transport or bicycle. This traffic would cover industrial shipments of fuel, heavy goods, materials and the ubiquitous private car, well known to every developing airport. Where are the coherent plans to solve either the A27 or A259 road congestion problems that have existed for at least 10 years? Where is the timeline and information showing when these plans can be proposed, how long they will take to implement and how they will be financed? If "sustainable" refers to the carbon dioxide, oxides of nitrogen, carbon monoxide or hydrocarbon emission footprint or ecological status of the airport, then certainly none of these aspects is likely to be even sustained at today's levels. How can the projected situation be "sustainable", with plans for over 200 plane movements each calendar day of the year, increased industrial activities, increased transport, more non-degradeable toxic fluids in use, increased effluents from the industrial buildings and a general increase in human waste of all types? "Sustainable" is a fashionable, nice to use, "wishing" word and probably in this case an unattainable target. It is considered unsound and misleading to suggest that there can be a sustainable transport policy and the almost impossibility of sustainable local transport, certainly in the next 20 years, makes it unlikely to be supported by a robust plan. It should therefore be highlighted that the "sustainable transport" target of R4 is unobtainable in the foreseeable future, and probably will remain unobtainable until there is a change in regional, national and international policies and implementation. Let's be realistic ADC!</p> <p>2 "The environment of the airport will be enhanced". (Tests 7 & 8) What is the exact meaning of these words? Has the current environmental status of the airport been objectively quantified in terms of air quality, noise, congestion and impact on human and animal life? What metrics have been used? Where is the data? What is the cost of taking such measurements on a regular basis? How will these measurements be financed? Along similar lines, what are the conceptual plans to improve traffic, to improve air quality, to improve noise, to improve congestion and to reduce the impact on humans, flower and fauna? Erinaceous have also used, in the supporting evidence document, phraseology such as "negative impacts can be mitigated by realising opportunities for environmental enhancement"...What is meant by these almost throw-away claims? Can the developers cite any examples of their intentions so that we simple minded folk can understand how negative can be made less negative, and by how much? "Improvement of the environment" is considered a contradiction to the planned growth of activity, and again wishful thinking, without a measured baseline. The feasibility of this core target is therefore questioned. However, we would welcome definitions and a robust conceptual plans or suggestions, from ADC and Erinaceous, which might support such a target.</p> <p>3 "The gap will be retained". (Tests 7, 8 & 9) How can the gap be retained if there is internal growth in the airport? A link road, a railway halt, more buildings, lorry parks, car parks, more visitor amenities, the recently built new access road on the northern side, fuel farms, aircraft parking aprons, hangers etc all peripherally reduce the gap, ie the existing green space is physically reduced. Is this true or not true? Yes, the Adur River boundary and the Lancing eastern boundary won't physically move, but the bit in between will be gradually filled by development, if only to help meet the employment and regeneration policies espoused in the regeneration plan. Again, "retaining the gap" seems in conflict with the very nature of growth, unless all the growth is to take place within the existing buildings. Hence, retaining the gap is considered an unsound, unrealistic and misleading target. Some honest factual statements and provisional plans on the intended or potential building</p> |

development should be made available. □ 4□“ New developments will mitigate the risk of flooding at the airport”. (Tests 7, 8 & 9). The feasibility of this target is questioned. To date, there has been little success in mitigating flooding on the western and northern sides of the airport and in some roads in Lancing where flooding remains a frequent issue. With increased buildings, projected higher water levels due to global warming, and more forecasted variable tropical style rainfalls (again due to climate changes), what can ADC or Erinaceous offer to cope with these natural effects? Providing a flood warning scheme will not stem the flood; it only offers a menu driven telephone helpline without any sandbags (we know, from already being in the “Scheme”). Increasing flood proofing of buildings mitigates the damage, but not the event, nor the inconvenience and nor the loss of business. Sinking more concrete foundation rafts, whilst helping to keep the buildings “afloat”, will reduce the availability of land to soak and drain water, and will therefore accentuate any increase in water levels. Have ADC modelled or simulated the predicted effects of the added roads, buildings, sewage on the local and adjacent watertables? □ □ The evidence provided by ADC and Erinaceous to support this target does not address the fundamental issue of the airport area being readily waterlogged, an effect which will tend to become worse with the anticipated climate change, and with displacement of the natural draining environment by concrete building rafts and roads □ In summary, we feel the Airport Development (R4) targets are essentially wishful thinking and should either be more carefully identified so that they are attainable, or fundamentally reconsidered if the transport, environment, gap encroachment and flood susceptibility issues cannot be practically addressed before commencement of any work. In some cases, the targets are very misleading; please engage in plain factual speaking. □ In evidence to ADC, there has been a continuous road traffic problem along the A259 between the roundabout (Beach Access) on the western side of the Norfolk Bridge and the ADC offices on the eastern side (Ham Road area) for at least 10 years; NOx emission levels along this section of road are believed to be outside the allowed standards. This problem has been under the very noses of the ADC, without resolution and is evidence that the ADC has not been able to resolve traffic issues. With this fact and experience in mind, what confidence can we have in ADC’s ability to cope with the traffic issues and emissions associated with airport expansion? □ We look forward to ADC’s response. We do not feel qualified to make suggestions due to our limited knowledge of planning laws and procedures, but are very willing to act as sanity checkers and positive critics. Like ADC, we are interested in the “regeneration” of the locality, but not at expense of existing good features. □ □Whilst this letter is from the undersigned, we believe it reflects the views of many of the ~300 members who subscribe and support the Lancing/Shoreham-by-Sea CARE campaign. □

Communities Agains JP / J Pirault / Kitc 131 7

19 R4 Shoreham A 1□“Sustainable Transport will be established “ (Tests 3, 7, 8 & 9). Can this really be feasible when probably less than 0.1% of the UK’s transport uses sustainable fuels, and there is not even any national plan making any claims for fuel energy sustainability in the transport segment? This is a totally misleading word and probably an unattainable target. □ If “sustainable” refers to reduced traffic congestion inspite of increased activity, then this target is again questioned because the very nature of the increased use of the airport will induce much traffic that cannot readily be handled by rail, public road transport or bicycle. This traffic would cover industrial shipments of fuel, heavy goods, materials and the ubiquitous private car, well known to every developing airport. Where are the coherent plans to solve either the A27 or A259 road congestion problems that have existed for at least 10 years? Where is the timeline and information showing when these plans can be proposed, how long they will take to implement and how they will be financed? □ If “sustainable” refers to the carbon dioxide, oxides of nitrogen, carbon monoxide or hydrocarbon emission footprint or ecological status of the airport, then certainly none of these aspects is likely to be even sustained at today’s levels. How can the projected situation be “sustainable”, with plans for over 200 plane movements each calendar day of the year, increased industrial activities, increased transport, more non-degradeable toxic fluids in use, increased effluents from the industrial buildings and a general increase in human waste of all types? □ “Sustainable” is a fashionable, nice to use, “wishing” word and probably in this case an unattainable target. □ It is considered unsound and misleading to suggest that there can be a sustainable transport policy and the almost impossibility of sustainable local transport, certainly in the next 20 years, makes it unlikely to be supported by a robust plan. It should therefore be highlighted that the “sustainable transport” target of R4 is unobtainable in the foreseeable future, and probably will remain unobtainable until there is a change in regional, national and international policies and implementation. Let’s be realistic ADC! □ 2□“The environment of

the airport will be enhanced". (Tests 7 & 8) What is the exact meaning of these words? Has the current environmental status of the airport been objectively quantified in terms of air quality, noise, congestion and impact on human and animal life? What metrics have been used? Where is the data? What is the cost of taking such measurements on a regular basis? How will these measurements be financed? □ □ Along similar lines, what are the conceptual plans to improve traffic, to improve air quality, to improve noise, to improve congestion and to reduce the impact on humans, flower and fauna? □ □ Erinaceous have also used, in the supporting evidence document, phraseology such as "negative impacts can be mitigated by realising opportunities for environmental enhancement"...What is meant by these almost throw-away claims? 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| Savills | Simon | Fife | 124 | 3 | 19 | R4 Shoreham A | see sustainability appraisal rep form |
| Savills | Simon | Fife | 124 | 9 | 19 | R4 Shoreham A | Regeneration and new employment□ We fully support the identification of the airport as a key location for regeneration and new employment. This is consistent with the airport operator's vision to create a successful and sustainable airport catering for modern aviation and business needs alongside a vibrant visitor attraction with high quality buildings and public spaces. □ The reference in Policy R4 to 'additional development land' is particularly important as the adopted Local Plan limits new buildings to a zone along the southern boundary of the airport, which now has limited potential for further development. There is significant potential for new employment related development within the airport boundary on land currently allocated for employment purposes in the adopted Local Plan (Policies AE11 – AE14), but outside the existing building zone. Additional employment development will allow the airport operator to invest to underpin the airport's future and will assist in the economic revitalisation of the area consistent with regional economic (RES) policy and spatial planning (RSS) policy.□ In line with our representations on Policy E2, it is considered that the airport is a brownfield site as it meets the definition of previously developed land set out in Government guidance in PPS3 (land which is occupied by a permanent structure and associated fixed surface infrastructure, including the curtilage of the development). This conclusion is reinforced by the findings of the Crawley Borough LDF Core Strategy Evidence Base, which identifies Gatwick Airport, including the runway and related taxiing and grassed areas, as previously developed land. As noted in our representation on the Key Diagram, BAA and Crawley BC consider Gatwick Airport as an 'urban area'. 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The airport is one of the few locations with the potential to meet demands for higher quality modern floor space in the area; it is identified in the Adur Employment Land Study as the most attractive potential development location in the District. We therefore object to this policy wording as it is unclear and represents an unnecessary restriction on the economic potential of this key regeneration site. Evidence in support of a less restrictive approach in line with the preferred options consultation document is set out in the following paragraphs.□ The Government's White Paper on air transport (The Future of Air Transport, 2004) recognises Shoreham Airport as a second tier airport where Commercial and Business Aviation are to be encouraged. The White Paper sets a positive and ambitious policy direction for second tier airports – it highlights the case for co-locating business and airports, stating that: □ "Airports...attract business and generate employment and open up wider markets. 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Key points highlighted in the report include:□ •□ Air services are particularly important for UK trade with fast-growing emerging economies, such as China, and for trade in high value goods and services.□•□ Air services are very important for the growth sectors on which the UK's future economic success will depend, such as high-tech |

companies and financial & business services. □ • □ A quarter of companies report that access to air services is important in determining where they locate their operations in the UK. □ • □ Implementing the proposals in the government's airports White Paper would generate substantial wider economic benefits. □ The restrictive approach to employment development at the airport proposed in Policy R4 is considered to be inconsistent with the following policies in the draft South East Plan: □ • □ Policy SCT2 highlights the need for a step change in the economic performance of the Sussex Coast Sub-region and directs measures to promote economic and social regeneration to the areas of greatest need, including Shoreham. □ • □ Policy SCT3 identifies the need to find innovative ways of delivering employment land including mixed uses, and refers to the need for a delivery mechanism to unlock and implement sites with economic development potential including Shoreham Airport. □ • □ Policy SCT6 aims to capitalise on strategic port and airport opportunities at Shoreham. □ • □ Policy E2 notes the marginal viability of many identified employment sites; this may require the introduction of mixed uses to help fund provision of employment. □ In view of the evidence supporting the benefits that can arise from co-locating business and airports, along with the need to support the regeneration and economic growth of the Sussex Coast sub-region, it is considered important that the core strategy does not seek to restrict the type of employment at the airport. □ Mixed-use development □ The policy would be further strengthened by an additional sentence at the end of the fourth point to encourage mixed-use development around the existing terminal building that will enhance the airport's role as a visitor attraction and help bring forward employment development, consistent with Policies E2 and EM3. □ Transport improvements □ In terms of transport improvements to support development, in line with current best practice, Erinaceous will assess the surrounding local transport network and consider a range of infrastructure and transport measures to mitigate the transport impacts of development. The proposed solutions will depend on the quantum and intensity of development proposed and the resulting traffic and trip impacts of the development.

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 Gaps between settlements □ The last paragraph of Policy R4 in relation to retaining the gap between Shoreham and Lancing is considered unclear as the policy seeks to preserve the open area of land between Shoreham and Lancing at the same time as allocate the airport as a location for additional employment land. □ Detailed comments on the gaps between settlements policy have been made in our representations to Policy ENV6. The policy approach is considered to be at variance with the approach to local landscape designations set out in PPS7, and conflicts with Policies SCT3, SCT4, SCT6 and E2 of the draft South East Plan. In particular, Policy SCT4 recognises that some infringement of environmental constraints may be needed in order to deliver priority employment allocations. □ Policy R4 should be amended to refer to retaining an area of open land between Shoreham and Lancing to ensure the separate identity and character of these settlements. Such an approach would be consistent with Policy ENV6 which states that the size of the gap will be no greater than is necessary to maintain the identity of the settlements and to prevent their coalescence □ Changes sought □ On the basis of the above representations, we seek the following changes to Policy R4 Shoreham Airport: □ "The airport will be a key location for regeneration and new employment with additional development land for mainly high-quality employment, airport related businesses, and small-scale ancillary uses. □ It is proposed to support The role of the airport as a centre of General Aviation, commercial and business travel, and as a visitor attraction will be supported. □ Sustainable transport improvements will be needed as well as measures to mitigate traffic impacts. □ High quality design of buildings and public spaces will need to be secured and account taken of the listed Terminal Building. Mixed use development around the terminal building will be supported where it will enhance the airport's role as a visitor attraction and help to deliver employment development. □ Measures will be sought to enhance the quality of the environment in the airport area and to mitigate the environmental impacts of development, particularly in respect of flood risk, nature conservation and biodiversity. □ Any new development within the gap at the airport must not conflict with the principle of retaining the an open area of land between Shoreham and Lancing to ensure the separate identity and character of these settlements." □

Communities Agains JP / J Pirault / Kitc 131 3 19 R4 Shoreham A 1 □ "Sustainable Transport will be established " (Tests 3, 7, 8 & 9). Can this really be feasible when probably less than 0.1% of the UK's transport uses sustainable fuels, and there is not even any national plan making any claims for fuel energy sustainability in the transport segment? This is a totally misleading word and probably an

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| Savills | Simon | Fife | 124 | 8 | 19 R4 Shoreham A | <p>Regeneration and new employment □ We fully support the identification of the airport as a key location for regeneration and new employment. This is consistent with the airport operator’s vision to create a successful and sustainable airport catering for modern aviation and business needs alongside a vibrant visitor attraction with high quality buildings and public spaces. □ The reference in Policy R4 to ‘additional development land’ is particularly important as the adopted Local Plan limits new buildings to a zone along the southern boundary of the airport, which now has limited potential for further development. There is significant potential for new employment related development within the airport boundary on land currently allocated for employment purposes in the adopted Local Plan (Policies AE11 – AE14), but outside the existing building zone. Additional employment development will allow the airport operator to invest to underpin the airport’s future and will assist in the economic revitalisation of the area consistent with regional economic (RES) policy and spatial planning (RSS) policy. □ In line with our representations on Policy E2, it is considered that the airport is a brownfield site as it meets the definition of previously developed land set out in Government guidance in PPS3 (land which is occupied by a permanent structure and associated fixed surface infrastructure, including the curtilage of the development). This conclusion is reinforced by the findings of the Crawley Borough LDF Core Strategy Evidence Base, which identifies Gatwick Airport, including the runway and related taxiing and grassed areas, as previously developed land. As noted in our representation on the Key Diagram, BAA and Crawley BC consider Gatwick Airport as an ‘urban area’. This would benefit from clarification, with the addition of the following text to paragraph 8.8: □ “In accordance with the Government’s definition of previously developed land, Shoreham Airport is considered a brownfield site.” □ Airport related businesses □ The policy approach to the airport has changed from supporting ‘High quality and airport related businesses’ in the preferred options consultation (this was supported by the airport owner) to a more restrictive wording in Policy R4, which limits new businesses to ‘mainly high-quality airport related businesses, and small-scale ancillary uses’. It is unclear why this change has been made. □ Whilst the airport is keen to attract high quality airport related businesses, there are also considerable advantages to co-locating non-aviation businesses at the airport that should not be overlooked. The airport is one of the few locations with the potential to meet demands for higher quality modern floor space in the area; it is identified in the Adur Employment Land Study as the most attractive potential development location in the District. We therefore object to this policy wording as it is unclear and represents an unnecessary restriction on the economic potential of this key regeneration site. Evidence in support of a less restrictive approach in line with the preferred options consultation document is set out in the following paragraphs. □ The Government’s White Paper on air transport (The Future of Air Transport, 2004) recognises Shoreham Airport as a second tier airport where Commercial and Business Aviation are to be encouraged. The White Paper sets a positive and ambitious policy direction for second tier airports – it highlights</p> |
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- Air services are particularly important for UK trade with fast-growing emerging economies, such as China, and for trade in high value goods and services.
- Air services are very important for the growth sectors on which the UK's future economic success will depend, such as high-tech companies and financial & business services.
- A quarter of companies report that access to air services is important in determining where they locate their operations in the UK.
- Implementing the proposals in the government's airports White Paper would generate substantial wider economic benefits.

The restrictive approach to employment development at the airport proposed in Policy R4 is considered to be inconsistent with the following policies in the draft South East Plan:

- Policy SCT2 highlights the need for a step change in the economic performance of the Sussex Coast Sub-region and directs measures to promote economic and social regeneration to the areas of greatest need, including Shoreham.
- Policy SCT3 identifies the need to find innovative ways of delivering employment land including mixed uses, and refers to the need for a delivery mechanism to unlock and implement sites with economic development potential including Shoreham Airport.
- Policy SCT6 aims to capitalise on strategic port and airport opportunities at Shoreham.
- Policy E2 notes the marginal viability of many identified employment sites; this may require the introduction of mixed uses to help fund provision of employment.

In view of the evidence supporting the benefits that can arise from co-locating business and airports, along with the need to support the regeneration and economic growth of the Sussex Coast sub-region, it is considered important that the core strategy does not seek to restrict the type of employment at the airport. Mixed-use development The policy would be further strengthened by an additional sentence at the end of the fourth point to encourage mixed-use development around the existing terminal building that will enhance the airport's role as a visitor attraction and help bring forward employment development, consistent with Policies E2 and EM3. Transport improvements In terms of transport improvements to support development, in line with current best practice, Erinaceous will assess the surrounding local transport network and consider a range of infrastructure and transport measures to mitigate the transport impacts of development. The proposed solutions will depend on the quantum and intensity of development proposed and the resulting traffic and trip impacts of the development.

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| Savills | Simon | Fife | 124 | 6 | 19 | <p>R4 Shoreham A Regeneration and new employment □ We fully support the identification of the airport as a key location for regeneration and new employment. This is consistent with the airport operator's vision to create a successful and sustainable airport catering for modern aviation and business needs alongside a vibrant visitor attraction with high quality buildings and public spaces. □ The reference in Policy R4 to 'additional development land' is particularly important as the adopted Local Plan limits new buildings to a zone along the southern boundary of the airport, which now has limited potential for further development. There is significant potential for new employment related development within the airport boundary on land currently allocated for employment purposes in the adopted Local Plan (Policies AE11 – AE14), but outside the existing building zone. Additional employment development will allow the airport operator to invest to underpin the airport's future and will assist in the economic revitalisation of the area consistent with regional economic (RES) policy and spatial planning (RSS) policy. □ In line with our representations on Policy E2, it is considered that the airport is a brownfield site as it meets the definition of previously developed land set out in Government guidance in PPS3 (land which is occupied by a permanent structure and associated fixed surface infrastructure, including the curtilage of the development). This conclusion is reinforced by the findings of the Crawley Borough LDF Core Strategy Evidence Base, which identifies Gatwick Airport, including the runway and related taxiing and grassed areas, as previously developed land. As noted in our representation on the Key Diagram, BAA and Crawley BC consider Gatwick Airport as an 'urban area'. This would benefit from clarification, with the addition of the following text to paragraph 8.8: □ "In accordance with the Government's definition of previously developed land, Shoreham Airport is considered a brownfield site." □ Airport related businesses □ The policy approach to the airport has changed from supporting 'High quality and airport related businesses' in the preferred options consultation (this was supported by the airport owner) to a more restrictive wording in Policy R4, which limits new businesses to 'mainly high-quality airport related businesses, and small-scale ancillary uses'. It is unclear why this change has been made. □ Whilst the airport is keen to attract high quality airport related businesses, there are also considerable advantages to co-locating non-aviation businesses at the airport that should not be overlooked. The airport is one of the few locations with the potential to meet demands for higher quality modern floor space in the area; it is identified in the Adur Employment Land Study as the most attractive potential development location in the District. We therefore object to this policy wording as it is unclear and represents an unnecessary restriction on the economic potential of this key regeneration site. Evidence in support of a less restrictive approach in line with the preferred options consultation document is set out in the following paragraphs. □ The Government's White Paper on air transport (The Future of Air Transport, 2004) recognises Shoreham Airport as a second tier airport where Commercial and Business Aviation are to be encouraged. The White Paper sets a positive and ambitious policy direction for second tier airports – it highlights the case for co-locating business and airports, stating that: □ "Airports...attract business and generate employment and open up wider markets. They can provide an important impetus to regeneration and a focus for new commercial and industrial development...Many airports increasingly act as a focal point for 'clusters' of business development." □ The recently published Eddington Transport Study recognises that the service sector and international trade are of growing economic importance to the UK, and highlights the need to facilitate the trade of goods and services through key ports and airports, noting that The European Council of Transport Ministers cite</p> |
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airport and port infrastructure as one of the critical success factors for economic growth, business location decisions and tourism. □ A recent report by York Aviation for the Airport Operators Association points towards the presence of an airport as a major locational draw for business. □ A report by Oxford Economic Forecasting highlights the important contribution that aviation makes to the UK economy by helping other sectors to operate more efficiently and to compete in the global economy, supporting productivity and economic growth across UK as a whole. Key points highlighted in the report include: □ • □ Air services are particularly important for UK trade with fast-growing emerging economies, such as China, and for trade in high value goods and services. □ • □ Air services are very important for the growth sectors on which the UK's future economic success will depend, such as high-tech companies and financial & business services. □ • □ A quarter of companies report that access to air services is important in determining where they locate their operations in the UK. □ • □ Implementing the proposals in the government's airports White Paper would generate substantial wider economic benefits. □ The restrictive approach to employment development at the airport proposed in Policy R4 is considered to be inconsistent with the following policies in the draft South East Plan: □ • □ Policy SCT2 highlights the need for a step change in the economic performance of the Sussex Coast Sub-region and directs measures to promote economic and social regeneration to the areas of greatest need, including Shoreham. □ • □ Policy SCT3 identifies the need to find innovative ways of delivering employment land including mixed uses, and refers to the need for a delivery mechanism to unlock and implement sites with economic development potential including Shoreham Airport. □ • □ Policy SCT6 aims to capitalise on strategic port and airport opportunities at Shoreham. □ • □ Policy E2 notes the marginal viability of many identified employment sites; this may require the introduction of mixed uses to help fund provision of employment. □ In view of the evidence supporting the benefits that can arise from co-locating business and airports, along with the need to support the regeneration and economic growth of the Sussex Coast sub-region, it is considered important that the core strategy does not seek to restrict the type of employment at the airport. □ Mixed-use development □ The policy would be further strengthened by an additional sentence at the end of the fourth point to encourage mixed-use development around the existing terminal building that will enhance the airport's role as a visitor attraction and help bring forward employment development, consistent with Policies E2 and EM3. □ Transport improvements □ In terms of transport improvements to support development, in line with current best practice, Erinaceous will assess the surrounding local transport network and consider a range of infrastructure and transport measures to mitigate the transport impacts of development. The proposed solutions will depend on the quantum and intensity of development proposed and the resulting traffic and trip impacts of the development.

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Gaps between settlements □ The last paragraph of Policy R4 in relation to retaining the gap between Shoreham and Lancing is considered unclear as the policy seeks to preserve the open area of land between Shoreham and Lancing at the same time as allocate the airport as a location for additional employment land. □ Detailed comments on the gaps between settlements policy have been made in our representations to Policy ENV6. The policy approach is considered to be at variance with the approach to local landscape designations set out in PPS7, and conflicts with Policies SCT3, SCT4, SCT6 and E2 of the draft South East Plan. In particular, Policy SCT4 recognises that some infringement of environmental constraints may be needed in order to deliver priority employment allocations. □ Policy R4 should be amended to refer to retaining an area of open land between Shoreham and Lancing to ensure the separate identity and character of these settlements. Such an approach would be consistent with Policy ENV6 which states that the size of the gap will be no greater than is necessary to maintain the identity of the settlements and to prevent their coalescence □ Changes sought □ On the basis of the above representations, we seek the following changes to Policy R4 Shoreham Airport: □ "The airport will be a key location for regeneration and new employment with additional development land for mainly high-quality employment, airport related businesses, and small-scale ancillary uses. □ It is proposed to support The role of the airport as a centre of General Aviation, commercial and business travel, and as a visitor attraction will be supported. □ Sustainable transport improvements will be needed as well as measures to mitigate traffic impacts. □ High quality design of buildings and public spaces will need to be secured and account taken of the listed Terminal Building. Mixed use development around the terminal building will be supported where it will enhance the airport's role as a visitor

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| | | | | | | | attraction and help to deliver employment development. □ Measures will be sought to enhance the quality of the environment in the airport area and to mitigate the environmental impacts of development, particularly in respect of flood risk, nature conservation and biodiversity. □ Any new development within the gap at the airport must not conflict with the principle of retaining the an open area of land between Shoreham and Lancing to ensure the separate identity and character of these settlements.” □ |
| Savills | Simon | Fife | 124 | 4 | 19 | R4 Shoreham A | Regeneration and new employment □ We fully support the identification of the airport as a key location for regeneration and new employment. This is consistent with the airport operator’s vision to create a successful and sustainable airport catering for modern aviation and business needs alongside a vibrant visitor attraction with high quality buildings and public spaces. □ The reference in Policy R4 to ‘additional development land’ is particularly important as the adopted Local Plan limits new buildings to a zone along the southern boundary of the airport, which now has limited potential for further development. There is significant potential for new employment related development within the airport boundary on land currently allocated for employment purposes in the adopted Local Plan (Policies AE11 – AE14), but outside the existing building zone. Additional employment development will allow the airport operator to invest to underpin the airport’s future and will assist in the economic revitalisation of the area consistent with regional economic (RES) policy and spatial planning (RSS) policy. □ In line with our representations on Policy E2, it is considered that the airport is a brownfield site as it meets the definition of previously developed land set out in Government guidance in PPS3 (land which is occupied by a permanent structure and associated fixed surface infrastructure, including the curtilage of the development). This conclusion is reinforced by the findings of the Crawley Borough LDF Core Strategy Evidence Base, which identifies Gatwick Airport, including the runway and related taxiing and grassed areas, as previously developed land. As noted in our representation on the Key Diagram, BAA and Crawley BC consider Gatwick Airport as an ‘urban area’. This would benefit from clarification, with the addition of the following text to paragraph 8.8: □ “In accordance with the Government’s definition of previously developed land, Shoreham Airport is considered a brownfield site.” □ Airport related businesses □ The policy approach to the airport has changed from supporting ‘High quality and airport related businesses’ in the preferred options consultation (this was supported by the airport owner) to a more restrictive wording in Policy R4, which limits new businesses to ‘mainly high-quality airport related businesses, and small-scale ancillary uses’. It is unclear why this change has been made. □ Whilst the airport is keen to attract high quality airport related businesses, there are also considerable advantages to co-locating non-aviation businesses at the airport that should not be overlooked. The airport is one of the few locations with the potential to meet demands for higher quality modern floor space in the area; it is identified in the Adur Employment Land Study as the most attractive potential development location in the District. We therefore object to this policy wording as it is unclear and represents an unnecessary restriction on the economic potential of this key regeneration site. Evidence in support of a less restrictive approach in line with the preferred options consultation document is set out in the following paragraphs. □ The Government’s White Paper on air transport (The Future of Air Transport, 2004) recognises Shoreham Airport as a second tier airport where Commercial and Business Aviation are to be encouraged. The White Paper sets a positive and ambitious policy direction for second tier airports – it highlights the case for co-locating business and airports, stating that: □ “Airports...attract business and generate employment and open up wider markets. They can provide an important impetus to regeneration and a focus for new commercial and industrial development...Many airports increasingly act as a focal point for ‘clusters’ of business development.” □ The recently published Eddington Transport Study recognises that the service sector and international trade are of growing economic importance to the UK, and highlights the need to facilitate the trade of goods and services through key ports and airports, noting that The European Council of Transport Ministers cite airport and port infrastructure as one of the critical success factors for economic growth, business location decisions and tourism. □ A recent report by York Aviation for the Airport Operators Association points towards the presence of an airport as a major locational draw for business. □ A report by Oxford Economic Forecasting highlights the important contribution that aviation makes to the UK economy by helping other sectors to operate more efficiently and to compete in the global economy, supporting productivity and economic growth across UK as a whole. Key points highlighted in the report include: □ • □ Air services are particularly important for UK trade with fast- |

growing emerging economies, such as China, and for trade in high value goods and services. Air services are very important for the growth sectors on which the UK's future economic success will depend, such as high-tech companies and financial & business services. A quarter of companies report that access to air services is important in determining where they locate their operations in the UK. Implementing the proposals in the government's airports White Paper would generate substantial wider economic benefits. The restrictive approach to employment development at the airport proposed in Policy R4 is considered to be inconsistent with the following policies in the draft South East Plan: Policy SCT2 highlights the need for a step change in the economic performance of the Sussex Coast Sub-region and directs measures to promote economic and social regeneration to the areas of greatest need, including Shoreham. Policy SCT3 identifies the need to find innovative ways of delivering employment land including mixed uses, and refers to the need for a delivery mechanism to unlock and implement sites with economic development potential including Shoreham Airport. Policy SCT6 aims to capitalise on strategic port and airport opportunities at Shoreham. Policy E2 notes the marginal viability of many identified employment sites; this may require the introduction of mixed uses to help fund provision of employment. In view of the evidence supporting the benefits that can arise from co-locating business and airports, along with the need to support the regeneration and economic growth of the Sussex Coast sub-region, it is considered important that the core strategy does not seek to restrict the type of employment at the airport. Mixed-use development The policy would be further strengthened by an additional sentence at the end of the fourth point to encourage mixed-use development around the existing terminal building that will enhance the airport's role as a visitor attraction and help bring forward employment development, consistent with Policies E2 and EM3. Transport improvements In terms of transport improvements to support development, in line with current best practice, Erinaceous will assess the surrounding local transport network and consider a range of infrastructure and transport measures to mitigate the transport impacts of development. The proposed solutions will depend on the quantum and intensity of development proposed and the resulting traffic and trip impacts of the development.

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| Strutt & Parker | Craig | Noel | 103 7 | 19 R4 Shoreham A | The focus on further development for high-quality and airport-related development at Shoreham Airport is supported. However the policy should give a clearer indication of the scale of development contemplated and the environmental enhancements that might be considered appropriate. Paragraph 8.13 contemplates "major" employment development at Shoreham Cement Works while at Shoreham Airport the policy refers to "additional development land for mainly high-quality airport related businesses, and small scale ancillary uses". However, in the Strategic Transport Study, under the "Adur LDF scenario assumptions" the highways implications of developing 80,000sqm (over 860,000sqm) of commercial space at Shoreham Airport is tested. This level of commercial development is nearly as much as contemplated at the Cement Works and the Harbour combined. If the Council is contemplating this level of development, then Policy R4 does not reflect this. Such a level of growth would be inconsistent with the tone of Policy R4 (which is supported). |
| South Downs Joint | N J | Belderson | 106 7 | 19 R4 Shoreham A | The site is on flat, low-lying ground. It is therefore very visible from the higher ground in the Sussex Downs AONB to the north. The Policy therefore needs to acknowledge the proximity of the AONB and the potential impact on views. |
| Broadlands Chartere | Paul | Carter | 94 7 | 19 R4 Shoreham A | Policy should be recast to ensure that no development is permitted that is unacceptable in terms of flood risk, nature conservation or biodiversity impacts, and that no increase in flight numbers will be permitted unless the environmental impacts, including noise, do not adversely effect the environment taking account of the impact both on the existing community and other development opportunities consistent with the objective to secure the economic and social regeneration of Adur as per the first strategic objective of the Plan and the other facets of Policy R1. |
| South Downs Joint | N J | Belderson | 106 4 | 19 R4 Shoreham A | Growth in Aviation at Shoreham is contrary to Policy Response P3.7 (Growth in aviation) of the South Downs Management Plan Consultation Draft (June 2006). The Policy Response seeks to ensure that there is no further increase in noise (over 2005 levels) from aviation over the South Downs. Para 3.3.1 of the Draft Management Plan states "Growth in aviation is a further threat to the peace and serenity of the South Downs..." |
| Alliance Environment | Christian | Holliday | 120 0 | 20 R5 Shoreham | |
| South Downs Joint | N J | Belderson | 106 7 | 20 R5 Shoreham | The site is within the Sussex Downs AONB. The policy does not limit development to only as much as is needed to secure the remediation of the site (which should be the principal objective of any redevelopment). Therefore, this does not represent the best option for the site. The importance of this was reflected in the Horsham Core Strategy, as the specific circumstance for including the site within the Core Strategy was "the need to ensure the landscape restoration of this large redundant industrial facility within the Sussex Downs AONB and to help the economic regeneration of the Sussex Coast Area". □ Any development should have a high standard of design consistent with the position within the AONB. |
| Environment Agency | Emma | Winchester | 100 7 | 20 R5 Shoreham | We note that the Core Policy on Nature Conservation and Biodiversity has now been deleted following advice from the Government Office of the South East (GOSE). While we have no major objection to this, we highlight that it is essential that the principles of 'Planning Policy Statement 9: Biodiversity and Geological Conservation' (PPS9) as well as NRM4 of the Draft South East Plan are taken into account and applied throughout the implementation of the Core Strategy. □ Throughout section 14 there is frequent reference made to the need to protect and enhance the quality of the environment as well as specific reference to biodiversity and habitat creation in some policies. We are therefore satisfied that the principles of PPS9 have been adequately addressed throughout the core policies and background text relating to the environment. □ There is a slight inconsistency between the way biodiversity and nature conservation is addressed throughout the RG3, RG4, RG5. All of these policies include reference to 'environmental improvements' or 'minimising and/or enhancing the quality of the environment'. R4 on Shoreham Airport goes further to state 'particularly in respect of flood risk and nature conservation and biodiversity'. We realise that policies are interdependent and should be read as a whole, however there is a risk that some readers may interpret this to mean that nature conservation and biodiversity should only be considered at Shoreham Airport. While we appreciate this is an area of high value and vulnerability as well as potential for enhancement, nature |

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| | | | | | | | conservation and biodiversity considerations should also addressed throughout the regeneration proposed at both the Harbour and Cement Works. □ We therefore suggest that the following wording is added to R3 and R5: □ □ R3 (to follow on from the end of paragraph 4)"...flood risk and nature conservation and biodiversity. □- R5 (to follow on from bullet point 4) "... any environmental impacts (including nature conservation and biodiversity). □ We also emphasise that it essential for nature conservation and biodiversity to be incorporated into your emerging Development Control Policies SPD. □ |
| Brighton & Hove City | Michael | Holford | 102 | 8 | 20 | R5 Shoreham | The City Council notes the proposal for a mixed use scheme at Shoreham Cement Works including inclusion of waste facilities. Any development on this site could have significant implications for Brighton & Hove. In particular, any waste treatment facility on the site will generate an amount of residual waste which will need to be transported elsewhere for disposal. There is concern that the transport of residual waste could have implications for the road network in Brighton & Hove, that is already heavily used. The City Council therefore, wishes to be consulted on any application for development at Shoreham Cement Works. This should be set out clearly in the implementation plan for the Core Strategy. |
| BBP Regeneration | Rob | Bennett | 115 | 9 | 21 | 9.3 | See comments relative to test 7 above. |
| BBP Regeneration | Rob | Bennett | 115 | 7 | 21 | 9.3 | Paragraph 9.3 is unsound for the same reasons noted in SEEDA's representation on Policy H1, i.e. that the inclusion of a figure of 500 homes at Shoreham Harbour is premature in light of an ongoing review of the 1999 Shoreham Maritime Vision, and an emerging Delivery Plan for Shoreham Harbour and subsequent Joint Area Action Plan, where a specific quantum and mix of housing will be put forward. □ Policy SH1 also appears to be incorrectly referenced - Policy R3 would appear to be the correct reference. □ SEEDA therefore proposes the following change to para 9.3: □ "9.3 It should be noted that the following policy (EM1) does not apply to Shoreham Harbour. The Harbour is recognised as an area that should be treated individually given its size, complexities involving the need for new infrastructure and land reclamation, and regeneration opportunities through a mix of uses. Therefore, the Harbour is dealt with specifically under policy R3 in the regeneration section." □ |
| Dr Malcolm Bell Ltd | M | Bell | 86 | 5 | 21 | E1 Retaining an | We object passim - but especially to the last section opf E1 and ALL of E2. □ We call attention firstly, please, to the front-end-loaded submissions made in discussions and the overarching points submitted as part of this representation but not pointlessly repeated within each representation. [Note on 1st March : this was one way we tried not to repeat words within each representation but it looks like we may have to carry it into each.] □ We have considerable experience nationally within the planning system of the provision of new employment opportunities on land built up and developed for formerly strong rural industries. □ There has been a widespread pattern of countryside change and PPS7 sums it well. □ One of the areas which has seen particular decline and could not compete with cheap imports from southern Europe has been the south coast horticultural industry. □ A strategy specific to a south coast area was always likely to encounter the question of moving on land from this declined industry to a new use. □ One could have a long and interesting debate about whether such sites should in particular instances be considered greenfield, brownfield, greenfield with brownfield characteristics, overall best regarded as brownfield, or whatever. We have been having that debate with the Authority for quite some time except that it is - with all respect to a very busy Authority - not quite a debate because we send information and nothing comes back. □ Throughout the country the planning system has dealt with a wide range of agricultural, intensive livestock, growing and packing and various combinations of site with considerable buildings which will not blend back by nature and need a new use. We have learned that some can prove extremely useful gains for the local economy. Some diversify and convert easily to new economic uses. Others do not. One may have advertising policies to see if other economic uses can be attracted. That seems to be hinted at in these policies but they are not clear how they regard a former site of employment use immediately adjacent to a built-up area. □ The principal drafter of these representations, as a former advisor at NFU Headquarters and then specialist in rural diversification over many years, has seen many sites have to go through a cycle of advertising as a matter of ritual when it has been perfectly evident that no reasonable economic use could come forward which would not cause conflict with adjacent housing, |

be inappropriate to the road system or whatever. In too many cases such matters have had to be sorted out on appeal. Planning is and should be a learned profession. A vision for the next 20 years should bring lessons from the last. The vision should be clear as to how it is to deal with this type of issue. Six weeks in a busy life is not long to react to a Core Strategy. Perfection is not claimed for any of the proposed changes herein, but the system gains if someone is thinking through and testing the policies. We respectfully suggest that the Policy should grow from its justification. Therefore paragraph 9.7 might say as a new third sentence "this approach applies to employment provision on the areas of former rural employment uses whether they were farmyards, packing stations, horticultural units, intensive livestock units or similar. Unhelpful debate over their specific brownfield or greenfield status will be eschewed as it does not benefit the economy nor environment of the area. A practical approach is needed. The Authority will start from the position that all should be regarded as ?? [here we respectfully feel the Authority has to decide whether it wishes them to be considered broadly brownfields and thus available for economic development if appropriate, or greenfields and to languish or be brought forward as exceptions]. In our view it would be best to treat them as brownfields. In Policy E2 the first bullet point could say "the use of brownfield land or the formerly developed areas of agricultural, horticultural and related uses." The next sentence should say "the use of truly greenfield". We respectfully submit that the issues raised by us, and the need to provide a suitable visionary framework for derelict and under-used land within a Conservation Area in a South Eastern District with limited land, is of such materiality that it merits oral discussion. We also respectfully submit that the issues involved will benefit from the give-and-take of oral examination. Finally, we respectfully submit that the issues we are raising may be of wide importance to the Core Strategy of the District.

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| Savills | Simon | Fife | 124 | 9 | 21 | E1 Retaining an | The principle of protecting employment land is fully supported and the identification of Shoreham Airport as an employment site to be protected and enhanced is welcomed. However, Policy E1 as it is currently set out does not provide sufficient flexibility to allow for appropriate mixed-use developments and is inconsistent with Policy E2 New Employment Provision, which takes a more flexible approach, encouraging the consideration of mixed-uses where appropriate. For example the forthcoming planning application by Erinaceous for the area around the terminal building at Shoreham Airport will provide for a mix of uses that will enhance the vitality and variety of the area, facilitate the restoration of the listed terminal building, and deliver significant additional employment floorspace. The proposals are considered entirely consistent with the protection and enhancement of this important employment site and Erinaceous remain entirely committed to supporting future employment use at the airport. Policy E1 should be re-worded to address its interface with Policy E2. Accordingly, it should encourage opportunities for appropriate mixed-use developments within employment areas. This would be in line with Government guidance in PPG3, PPG4, PPS6, and PPG13, which support mixed-use development, and Policies E2 and SCT3 in the Draft South East Plan, which recognise that mixed-use development is important in securing the delivery of employment land. The following revisions to the policy text are suggested: Within the following employment sites conversion to other uses proposals which result in the net loss of employment floorspace will be resisted due to their location, economic value and high level of use: Lancing Business Park, Shoreham Airport, Dolphin Road. The upgrading of existing employment sites and buildings will be encouraged so that they meet modern standards required by businesses and are more resource efficient. Mixed-use developments that contribute to wider regeneration objectives will be supported where they help to deliver additional employment floorspace and are compatible with the continued employment use of the site. |
| Broadlands Chartere | Paul | Carter | 94 | 7 | 21 | E1 Retaining an | Policy should be amended to provide robust protection of existing employment land and the jobs that rely thereon. Mere conflict with neighbouring uses should not in itself be sufficient to accept the loss of employment land and the jobs that it may support. A wide reservoir of employment land is required to support all sectors of the industrial, business, and commercial economy. The fact that a property does not lend itself to 'modern needs' should not permit the loss of employment space. Greater clarity is required of the marketing requirements. A proposal to upgrade employment floorspace should not in itself permit the loss of part of the existing floorspace. It is important to retain a portfolio of employment land suitable for all types of firms – big or small, modern or old, manufacturing, office or storage, good or bad neighbour uses, and uses that cannot afford to compete for higher |

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| | | | | | | | freehold prices or leasehold rents arising from modern development and property available on institutional leases.□ |
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| Planning Potential | Alastair | Close | 123 | 4 | 21 | E1 Retaining an | This policy is considered too restrictive, particularly in respect of PPS3, Paragraph 44, which acknowledges that currently allocated industrial and commercial land may be better utilised with a mix of uses. Given this background, along with the fact that both the South East Plan and the Spatial Vision for Adur both seek to encourage growth and regeneration of Shoreham, this policy should be more flexible in encouraging diversity on employment sites. The rigidity of the policy at present would prevent other and, indeed, new forms of employment that may otherwise sit comfortably with, for example mixed use schemes that incorporated residential, retail and leisure uses. |
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| South East England | Catriona | Riddell | 117 | 4 | 21 | E1 Retaining an | Policy E1 should clarify that 'other uses' for former employment sites should not normally include town centre uses, such as retail and leisure, where sequentially preferable sites are available, or should include an explicit cross reference to relevant policies such as PPS6. |
| Savills | Simon | Fife | 124 | 6 | 21 | E1 Retaining an | The principle of protecting employment land is fully supported and the identification of Shoreham Airport as an employment site to be protected and enhanced is welcomed. However, Policy E1 as it is currently set out does not provide sufficient flexibility to allow for appropriate mixed-use developments and is inconsistent with Policy E2 New Employment Provision, which takes a more flexible approach, encouraging the consideration of mixed-uses where appropriate. For example the forthcoming planning application by Erinaceous for the area around the terminal building at Shoreham Airport will provide for a mix of uses that will enhance the vitality and variety of the area, facilitate the restoration of the listed terminal building, and deliver significant additional employment floorspace. The proposals are considered entirely consistent with the protection and enhancement of this important employment site and Erinaceous remain entirely committed to supporting future employment use at the airport. Policy E1 should be re-worded to address its interface with Policy E2. Accordingly, it should encourage opportunities for appropriate mixed-use developments within employment areas. This would be in line with Government guidance in PPG3, PPG4, PPS6, and PPG13, which support mixed-use development, and Policies E2 and SCT3 in the Draft South East Plan, which recognise that mixed-use development is important in securing the delivery of employment land. The following revisions to the policy text are suggested: Within the following employment sites conversion to other uses proposals which result in the net loss of employment floorspace will be resisted due to their location, economic value and high level of use: Lancing Business Park Shoreham Airport Dolphin Road The upgrading of existing employment sites and buildings will be encouraged so that they meet modern standards required by businesses and are more resource efficient. Mixed-use developments that contribute to wider regeneration objectives will be supported where they help to deliver additional employment floorspace and are compatible with the continued employment use of the site. |
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| Dr Malcolm Bell Ltd | M | Bell | 86 | 7 | 21 E1 Retaining an | <p>We object passim - but especially to the last section of E1 and ALL of E2. □ We call attention firstly, please, to the front-end-loaded submissions made in discussions and the overarching points submitted as part of this representation but not pointlessly repeated within each representation. [Note on 1st March : this was one way we tried not to repeat words within each representation but it looks like we may have to carry it into each.] □ We have considerable experience nationally within the planning system of the provision of new employment opportunities on land built up and developed for formerly strong rural industries. □ There has been a widespread pattern of countryside change and PPS7 sums it well. □ One of the areas which has seen particular decline and could not compete with cheap imports from southern Europe has been the south coast horticultural industry. □ A strategy specific to a south coast area was always likely to encounter the question of moving on land from this declined industry to a new use. □ One could have a long and interesting debate about whether such sites should in particular instances be considered greenfield, brownfield, greenfield with brownfield characteristics, overall best regarded as brownfield, or whatever. We have been having that debate with the Authority for quite some time except that it is - with all respect to a very busy Authority - not quite a debate because we send information and nothing comes back. □ Throughout the country the planning system has dealt with a wide range of agricultural, intensive livestock, growing and packing and various combinations of site with considerable buildings which will not blend back by nature and need a new use. We have learned that some can prove extremely useful gains for the local economy. Some diversify and convert easily to new economic uses. Others do not. One may have advertising policies to see if other economic uses can be attracted. That seems to be hinted at in these policies but they are not clear how they regard a former site of employment use immediately adjacent to a built-up area. □ The principal drafter of these representations, as a former advisor at NFU Headquarters and then specialist in rural diversification over many years, has seen many sites have to go through a cycle of advertising as a matter of ritual when it has been perfectly evident that no reasonable economic use could come forward which would not cause conflict with adjacent housing, be inappropriate to the road system or whatever. In too many cases such matters have had to be sorted out on appeal. □ Planning is and should be a learned profession. A vision for the next 20 years should bring lessons from the last. The vision should be clear as to how it is to deal with this type of issue. □ Six weeks in a busy life is not long to react to a Core Strategy. Perfection is not claimed for any of the proposed changes herein, but the system gains if someone is thinking through and testing the policies. □ We respectfully suggest that the Policy should grow from its justification. Therefore paragraph 9.7 might say as a new third sentence "this approach applies to employment provision on the areas of former rural employment uses whether they were farmyards, packing stations,</p> |
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| RPS Planning on be | Rebecca | Caines | 104 | 4 | 21 | E1 Retaining an | FNH consider that residential development or mixed use development should in certain circumstances be promoted on allocated employment sites that are rundown, vacant and/or poorly located. Paragraph 42 of PPG3 (Housing) states that Local Planning Authorities should review all non-housing allocations and consider whether some of this land could be better utilised for housing. Moreover, in paragraph 42(a) it states that planning proposals that include housing on redundant or commercial land should expect 'sympathetic handling' and support from local authorities. Whilst the LPA should not have regard to PPS3 for material consideration until 1st April 2007, the policy guidance should therefore should at least still be identified and reported on in this Core Strategy document. In the interim, Planning Policy Guidance 3 is still of material relevance. Planning Policy Statement 3 on housing provides the context for achieving high quality and sustainable housing. In particular, paragraph 44 states that LPA should consider a whether sites that are currently allocated for industrial or commercial use could be more appropriately re-allocated for housing development. In such circumstances, residential development or mixed use development should be promoted in accordance with Planning Policy Statement 3 where such housing sites are deliverable. Furthermore, many designated employment land is left vacant or underused in urban areas. Paragraph 21 of PPG4 (Industrial, Commercial Development and Small Firms) states that it is essential to get this vacant/underused land back into beneficial use as it is important to the regeneration of towns and cities. LPA should identify such areas and indicate their appropriate alternative uses. PPG3 also recognises that 'land allocated for employment and other uses cannot realistically be taken up in the quantities envisaged over the lifetime of the development plan'. ENH therefore recommend that Adur Council should review their non-housing sites within this area as some of the sites may be better used for housing or mixed-use development. |
| South Downs Joint | N J | Belderson | 106 | 0 | 21 | E1 Retaining an | |
| Strutt & Parker | Craig | Noel | 103 | 7 | 21 | E1 Retaining an | The Draft South East Plan only allows the release of employment land for other uses where the sites concerned are "incapable of meeting the needs of business" (SCT3). The policy should make it clear that all existing employment uses should be protected as a matter of principle. The loss of the employment allocations associated with the former route of EWAR means that there is a reduced prospect of achieving campus-style employment development in the District, which adds to the importance of retaining existing employment land and uses. In addition, the allocation of land for commercial development within the District is no guarantee that good quality employment opportunities will follow. For this reason, no employment land should be released for other uses unless it can be demonstrated that there is a corresponding take-up of new, good quality employment generating development elsewhere within the District. The policy should make it clear that all existing employment uses should be protected as a matter of principle. The proposed policy test is therefore not sufficiently stringent - all three criteria listed should be met if the loss of employment land is to be supported. |
| Strutt & Parker | Craig | Noel | 103 | 4 | 22 | 9.6 | The reference to Draft South East Plan Policy SCT4 as set out in the Preferred Options should be included at this point in the policy preamble. |

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| Savills | Simon | Fife | 124 9 | 23 E2 New Employ | The commitment in Policy E2 to meet employment floorspace needs in the district to 2026 is supported and the identification of Shoreham Airport as a location for new employment floorspace is welcomed. It is important that there is a healthy supply and variety of employment land to ensure the regeneration objectives for the coastal towns are not prejudiced.□ The Preferred Options consultation document set out the intention to deliver at least the Structure Plan requirement of 110,000 sq m to 2016. This is considered the most appropriate policy response to give the core strategy sufficient flexibility to respond to changing circumstances and meet the regeneration objectives for the sub-region. The first sentence of Paragraph 9.5 should therefore be amended to read:□ 'Employment floorspace will be provided to meet at least the Structure Plan requirement of 110,000 sq m of employment floorspace from 2001 to 2016.'□ □The criteria for identifying new employment floor space emphasises the use of brownfield land as part of a sequential approach. In this context, it is considered that the airport is a brownfield site as it meets the definition of previously developed land set out in Government guidance in PPS3 (land which is occupied by a permanent structure and associated fixed surface infrastructure, including the curtilage of the development). This conclusion is reinforced by the findings of the Crawley Borough LDF Core Strategy Evidence Base, which identifies Gatwick Airport, including the runway and related taxiing and grassed areas, as previously developed land. Crawley BC and BAA also agree that Gatwick Airport should be treated as an 'urban area' for the purposes of planning policy. This would benefit from clarification, the following text should be added to paragraph 9.7: □ "For the purposes of the sequential approach, and in accordance with the Government's definition of previously developed land, Shoreham Airport is considered a brownfield site"□ □The recognition of opportunities for the provision of mixed-use development incorporating housing, leisure, retail and live / work units is supported. This is consistent with Government policy and can deliver significant regeneration benefits, provided it is carefully controlled through policy and development control mechanisms. This approach is reinforced by Policy SCT3 of the South East Plan, which recognises the role of mixed-use development where this could facilitate employment floor space.□ □ |
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| Savills | Simon | Fife | 124 4 | 23 E2 New Employ | The commitment in Policy E2 to meet employment floorspace needs in the district to 2026 is supported and the identification of Shoreham Airport as a location for new employment floorspace is welcomed. It is important that there is a healthy supply and variety of employment land to ensure the regeneration objectives for the coastal towns are not prejudiced.□ The Preferred Options consultation document set out the intention to deliver at least the Structure Plan requirement of 110,000 sq m to 2016. This is considered the most appropriate policy response to give the core strategy sufficient flexibility to respond to changing circumstances and meet the regeneration objectives for the sub-region. The first sentence of Paragraph 9.5 should therefore be amended to read:□ 'Employment floorspace will be provided to meet at least the Structure Plan requirement of 110,000 sq m of employment floorspace from 2001 to 2016.'□ □The criteria for identifying new employment floor space emphasises the use of brownfield land as part of a sequential approach. In this context, it is considered that the airport is a brownfield site as it meets the definition of previously developed land set out in Government guidance in PPS3 (land which is occupied by a permanent structure and associated fixed surface infrastructure, including the curtilage of the development). This conclusion is reinforced by the findings of the Crawley Borough LDF Core Strategy Evidence Base, which identifies Gatwick Airport, including the runway and related taxiing and grassed areas, as previously developed land. Crawley BC and BAA also agree that Gatwick Airport should be treated as an 'urban area' for the purposes of planning policy. This would benefit from clarification, the following text should be added to paragraph 9.7: □ "For the purposes of the sequential approach, and in accordance with the Government's definition of previously developed land, Shoreham Airport is considered a brownfield site"□ □The recognition of opportunities for the provision of mixed-use development incorporating housing, leisure, retail and live / work units is supported. This is consistent with Government policy and can deliver significant regeneration benefits, provided it is carefully controlled through policy and development control mechanisms. This approach is reinforced by Policy SCT3 of the South East Plan, which recognises the role of mixed-use development where this could facilitate employment floor space.□ □ |
| Alliance Environment | Christian | Holliday | 120 0 | 23 E2 New Employ | |
| Broadlands Chartere | Paul | Carter | 94 7 | 23 E2 New Employ | The quantum of floorspace to be provided in the period to 2026 should be specified and the policy amended to allow for Greenfield development (as a component of mixed use or otherwise) where justified through the application of the Sequential Test. |
| South Downs Joint | N J | Belderson | 106 7 | 23 E2 New Employ | The Joint Committee previously objected as reference should be made to the inappropriateness of developing new employment sites within the AONB (with the exception of the cement works site) and that any development adjacent to the AONB should include mitigation measures to reduce the potential impact. The submitted Policy E2 does not make these changes, although the Joint Committee does note that the specific policies for Shoreham Airport and the former cement works include a requirement for mitigation/enhancement. |
| Broadlands Chartere | Paul | Carter | 94 8 | 23 E2 New Employ | The quantum of floorspace to be provided in the period to 2026 should be specified and the policy amended to allow for Greenfield development (as a component of mixed use or otherwise) where justified through the application of the Sequential Test. |
| Savills | Simon | Fife | 124 4 | 23 E3 The Visitor | We fully support the proposed policy for the visitor economy given the potential to create a unique visitor attraction centered on the listed terminal building at Shoreham Airport.□ The supporting text at paragraph 9.9 should recognise the important contribution that the built environment can make in promoting and encouraging tourism. Shoreham Airport is already a popular attraction, the annual airshow brings significant numbers of visitors to the area and the regeneration of the airport has the potential to increase its popularity further.□ Policy E3 gives no guidance on where the uses and activities listed will be considered appropriate. The policy should be given a spatial perspective with the addition of the following text:□ "The following uses and activities will be promoted through new mixed-use developments in urban areas and at key regeneration sites that are identified in the core strategy as visitor attractions:"□ The role of Shoreham Airport as a visitor centre is should be referred to at paragraph 9.9 with the |

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| | | | | | | | addition of the following text: "The built environment also plays an important role in attracting visitors to the area. Proposals for the regeneration of Shoreham Airport should enhance its role as a popular visitor attraction. Proposals for hotel provision at the airport will be supported." |
| South Downs Joint | N J | Belderson | 106 | 0 | 23 | E3 | The Visitor |
| The Theatres Trust | Rose | Freeman | 132 | 0 | 23 | E3 | The Visitor |
| South Downs Joint | N J | Belderson | 106 | 0 | 26 | STC1 | Town Ce |
| Planning Potential | Alastair | Close | 123 | 4 | 26 | STC1 | Town Ce This policy is considered too restrictive, particularly in respect of PPS6. paragraph 2.10 of PPS6 recognises how the role and function of existing centres can evolve over time and further recognises the need for the creation of new centres. There is also concern that the Retail Study on which the retail section of the Submission Core Strategy is based adopts the constant market share approach when assessing potential capacity for Shoreham. the policy should become less rigid to accommodate these important considerations. A wider objective of the strategy for Shoreham is to encourage growth and regeneration, including being able to more effectively compete with, in particular, Brighton, Worthing and the Holmbush Centre. We would wish to see this policy adopt a more realistic approach in being able to effectively cater for the future growth of the town. Whilst the overriding objectives for the town centre may be to create a 'specialist/niche' market, this should not preclude the expansion and indeed, creation of new local and district centres to more adequately accommodate the envisaged growth. It is considered that a more flexible approach could be adopted that would actually complement the existing strategy for the town centre. Rather than be so prescriptive as to restrict all new development within the town centre, given the anticipated and promoted growth of Shoreham, it is considered that an extension to the existing centre should be accommodated. Potentially, this could, for example, maximise linkages between the centre and the river estuary, which forms an intrinsic part of the character of the town. This would help to stimulate and, indeed, deliver the wider objectives being sought by both the South-East Plan and the Spatial Vision for Adur, as set out at the beginning of the Submission Core Strategy. N.B. Further to this, we have noted that the telephone survey on which the Retail Study made many assumptions was actually part of a separate subregional study for Arun District Council, Chichester District Council and Worthing District Council and was designed as such. Indeed, the authors of that study, DTZ Planning, acknowledge that the results were, "...diluted across a wider area", and actually "strongly" recommend that the Council commission a bespoke survey, which would be more reflective of Adur's specific needs and requirements. We note that such a survey has not been prepared or commissioned, thereby undermining the position taken within policy STC1 |
| Planning Potential | Alastair | Close | 123 | 9 | 26 | STC1 | Town Ce This policy is considered too restrictive, particularly in respect of PPS6. paragraph 2.10 of PPS6 recognises how the role and function of existing centres can evolve over time and further recognises the need for the creation of new centres. There is also concern that the Retail Study on which the retail section of the Submission Core Strategy is based adopts the constant market share approach when assessing potential capacity for Shoreham. the policy should become less rigid to accommodate these important considerations. A wider objective of the strategy for Shoreham is to encourage growth and regeneration, including being able to more effectively compete with, in particular, Brighton, Worthing and the Holmbush Centre. We would wish to see this policy adopt a more realistic approach in being able to effectively cater for the future growth of the town. Whilst the overriding objectives for the town centre may be to create a 'specialist/niche' market, this should not preclude the expansion and indeed, creation of new local and district centres to more adequately accommodate the envisaged growth. It is considered that a more flexible approach could be adopted that would actually complement the existing strategy for the town centre. Rather than be so prescriptive as to restrict all new development within the town centre, given the anticipated and promoted growth of Shoreham, it is considered that an extension to the existing centre should be accommodated. Potentially, this could, for example, maximise linkages between the centre and the river estuary, which forms an intrinsic part of the character of the town. This would help to stimulate and, indeed, deliver the wider objectives being |

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| The Theatres Trust | Rose | Freeman | 132 | 0 | 26 | STC1 Town Ce | |
| The Theatres Trust | Rose | Freeman | 132 | 0 | 28 | STC3 Shoreha | |
| Strutt & Parker | Craig | Noel | 103 | 7 | 29 | 11.4 | Future redevelopment of school sites is a potential source of residential development land. However, where school sites include existing playing fields and open space, the presumption should be that such facilities are retained and ideally secured for community use as part of any planned redevelopment. The policy preamble should be adjusted to note that the potential contribution to housing requirements is subject to the retention and reuse of existing sports pitches and open space. |
| Home Builders Fede | Pete | Errington | 121 | 7 | 29 | 11.4 | In relation to the above the HBF consider that the council should be looking to undertake a Housing Land Availability Assessment as a component part of the evidence base for this LDF, as this is a requirement of PPS3. □Change Sought □The HBF wish for a commitment to undertake this study as a mechanism to identify all potential development sites both large and small, this should be referenced in the above paragraph. The HLAA should in any case be a prerequisite to the Site Allocations DPD. The HBF are unclear as to the logic behind just identifying large sites. □ |

| <i>Organisation</i> | <i>Forename</i> | <i>Surname</i> | <i>ID S'nes</i> | <i>Pg Paragraph</i> | <i>Comments</i> |
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| Shoreham Society | Bob | Cranmore | 133 7 | 29 11.4 | New Homes: the document gives a detailed list in table 1 of how the 1560 new homes (to 2018) are to be allocated between the four settlements. We would suggest that this precision is premature as the Site Allocations Document is just starting its consultation, and will not be finalised until (we are now told) early 2008. |
| Strutt & Parker | Craig | Noel | 103 0 | 30 11.6 | |
| Home Builders Fede | Pete | Errington | 121 7 | 30 11.6 | The HBF agree with the requirement to identify more sites as this offers a contingency should the rate of housing delivery fall below the expected targets. It is a requirement of PPS3 to identify a 5 year deliverable housing land supply. □ "Drawing on information from the Strategic Housing Land Availability Assessment and or other relevant evidence, Local Planning Authorities should identify sufficient specific deliverable sites to deliver housing in the first five years. To be considered deliverable, sites should, at the point of adoption of the relevant Local Development Document: □– Be Available – the site is available now. □– Be Suitable – the site offers a suitable location for development now and would contribute to the creation of sustainable, mixed communities. □– Be Achievable – there is a reasonable prospect that housing will be delivered on the site within five years" (PPS3 paragraph 54). □ However we question the use of an urban fringe study to achieve this, and consider that further work on this should be abandoned in favor of a HLAA. □ Change Sought □ Please see response to 11.4 above □ |
| Home Builders Fede | Pete | Errington | 121 8 | 31 11.7 | In relation to the included housing trajectory in the supporting evidence base documentation, the HBF note that this is now out of date and inadequate. In the circumstances the HBF do not see any sense in including the trajectory in the context of this core strategy. We have a concern about the inclusion of housing, which is to be delivered on unidentified sites until 2016 in any case. We note that the existing structure plan trajectory only shows completions on allocated sites for years up to 2012. In any case these are in some years much smaller in comparison to the level of delivery on non-allocated sites over the same time period. This is obviously contradictory to the intentions of the core strategy document, and the HBF would urge the council to revise the housing trajectory in response to the intent of the council to deliver large strategic housing sites. The trajectory obviously needs to identify a minimum of 130 units on identified sites until at least 2012 at the very least. The HBF would urge the council to progress their site allocations DPD and revised trajectory as soon as possible in the circumstances. Development of windfall sites are acceptable as and when they come forward, but they are no longer allowed to be included in the identified supply of housing land. As such they should be controlled by an effective plan, monitor and manage policy approach. □ □ We note that PPS 3 states that: □ "Allowances for windfalls should not be included in the first 10 years of land supply unless Local Planning Authorities can provide robust evidence of genuine local circumstances that prevent specific sites being identified. In these circumstances, an allowance should be included but should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends" (PPS3 paragraph 59). □ We do not believe that the council is in the above position and is unable to identify suitable housing sites. A comprehensive approach as we have suggested needs to be pursued to identify and allocate sites for housing. It should be possible for this to be achievable for a 15 year period as is desired by PPS3 paragraph 55. □ Change sought □ The paragraph should not refer to an existing trajectory but comment upon the production of a new trajectory in line with the housing delivery requirement of the South East Plan and PPS3. □ |
| Home Builders Fede | Pete | Errington | 121 7 | 31 11.7 | In relation to the included housing trajectory in the supporting evidence base documentation, the HBF note that this is now out of date and inadequate. In the circumstances the HBF do not see any sense in including the trajectory in the context of this core strategy. We have a concern about the inclusion of housing, which is to be delivered on unidentified sites until 2016 in any case. We note that the existing structure plan trajectory only shows completions on allocated sites for years up to 2012. In any case these are in some years much smaller in comparison to the level of delivery on non-allocated sites over the same time period. This is obviously contradictory to the intentions of the core strategy document, and the HBF would urge the council to revise the housing trajectory in response to the intent of the council to deliver large strategic housing sites. The trajectory obviously needs to identify a minimum of 130 units on identified sites until at least 2012 at the very least. The HBF would urge the council to progress their |

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Strutt & Parker Craig Noel 103 8 31 11.8

The annual review of the housing trajectory as described in 11.7 needs to be transcribed into a mechanism for determining the criteria for release of the contingency sites.

BBP Regeneration Rob Bennett 115 7 31 H1 Providing N

SEEDA believes that Policy H1 as currently drafted fails Test of Soundness #7 in that it is not the most appropriate in all circumstances and does not sufficiently cover the relevant alternatives. This is due to the fact that the figure of 500 new homes at Shoreham Harbour was originally derived from the 1999 Shoreham Maritime Vision document, which is currently under review by consultants on behalf of SEEDA, in conjunction with the Port. The revised Vision is expected to reveal a housing capacity significantly greater than 500 homes. The emerging recommendations will take into account newly released PPS3 guidance on the efficient and effective use of land. Although Policy H1 does reflect a “minimum” of 500 new homes, SEEDA nevertheless believes that including this figure sets the bar far too low.□ SEEDA’s submission to the South East Plan Examination in Public was that there was a need to increase housing provision in the Sussex Coast sub-region by over 10%, amounting to some 5,500 to 6,000 additional new homes over the period 2006-2026. This is part of an overall need to significantly increase housing provision in the South East region. Sustainable regeneration opportunities are the best way to achieve this, and SEEDA identified Shoreham Harbour as a potential opportunity to make a major contribution to this provision. It could have an overall capacity of 4,000-6,000 new homes, which will be divided between Adur and Brighton & Hove Districts.□ Consequently, as the South East Plan has yet to be formally adopted, and the final housing allocations for Adur District are not yet known, SEEDA believes that the Adur Core Strategy wording should include flexibility that this allocation could well be increased.□ An allocation at this time of 500 homes at Shoreham Harbour would also pre-judge the results of housing and related analysis which will inform the emerging Shoreham Area Action Plan. SEEDA intends to make more detailed representations at the time of the Area Action Plan with regard to specific housing allocations for Shoreham Harbour.□ SEEDA therefore recommends the following changes to Policy H1:□ “At least 2,600 new homes will be built in the district between 2006 and 2026 at an annual average rate of at least 130 dwellings per year, subject to the provision of necessary infrastructure. This target will be achieved by:□• Existing commitments;□• Focusing provision for the first ten years on allocated sites to be identified in the Site Allocations Development Plan Document. The majority of this provision will be on previously developed land with approximately 80% being on sites in Shoreham-by-Sea (including Shoreham town centre) and Southwick and 20% being in Lancing and Sompting (See Table 1);□• Proposing a significant number of new homes at Shoreham Harbour as part of a mixed use development in order to support and promote the regeneration of the harbour area, which is the subject of a revised Shoreham Maritime Vision involving a review of employment, housing levels, densities and timing of infrastructure.□ □

Strutt & Parker Craig Noel 103 8 31 H1 Providing N

The annual review of the housing trajectory as described in 11.7 needs to be transcribed into a mechanism for determining the criteria for release of the contingency sites.

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| Broadlands Chartere | Paul | Carter | 94 7 | 31 H1 Providing N | Given the acute need for affordable homes (paragraph 11.10) and the strategic objective to secure the economic and regeneration of Adur the policy should be revised to provide for the construction of at least 2600 new homes. |
| Michael Cox Associa | Michael | Cox | 116 9 | 31 H1 Providing N | The proportion of the provision of new homes between Shoreham/Southwick and Lancing/Sompting is determined by the retention of the strategic allocation of a minimum of 500 new homes at Shoreham Harbour. This allocation is dependent upon essential highways infrastructure being in place. This cannot be guaranteed and therefore the allocation fails the appropriate tests in PPS3. An allocation at New Monks Farm would readily satisfy these tests. |
| Michael Cox Associa | Michael | Cox | 116 7 | 31 H1 Providing N | See below |
| Michael Cox Associa | Michael | Cox | 116 4 | 31 H1 Providing N | See below |
| Dr Malcolm Bell Ltd | M | Bell | 86 6 | 31 H1 Providing N | <p>□ We object passim, but especially to the 2nd and 4th bullet points of Policy H1. □ In our representations on the Draft Core Strategy Preferred Options Stage in regard to the comparable part of the document, we made what we thought were important and useful points. These have not been followed but we feel they are important to the soundness of the document. □ We call attention firstly, please, to the front-end-loaded submissions made in discussions and the overarching points submitted as part of this representation but not pointlessly repeated within each representation. [Note on 1st March : this was one way we tried not to repeat words within each representation but it looks like we may have to carry it into each.] □ At the Preferred Option Stage we said in Representation 10: □ Broad support for the approach but scepticism about the sufficiency of appropriate brownfield sites. Depending on how one defines it then not all "greenfield" sites (p.78 last para of justification) would necessarily have negative aspects. This is an assumption too far and leads to wrong reasoning. Nor would all greenfield sites necessarily be more car dependent than brownfield sites. □ Specific objection to policy H1 para 3 which should say "the focus of this provision will be made on previously developed, derelict, despoiled, unused or under-used land within or adjacent to settlements up to 2018". □ In Representation 11 we said : □ Support broad principle but perceive conflict with spatial strategy. On p.20 this talks about moving from brownfield to greenfield land. In what is generally an extremely well written document this policy, we think, has problems with its English. Is it saying that priority will be given to the use of previously developed land which also meets bullet point criteria?. Alternatively it may need to say "...given to the use of sites which are on previously developed land and ...". This policy would seem to exclude the rural brownfields. Is it intended they should conflict? □ As throughout we believe it should allow for under-used etc land; particularly where it can fulfil the other objectives. □ A technical practical planner's objection is that it is almost impossible to judge that all new residential development will itself "reduce the need to travel by car". It may offer the best possibility. It may reduce the need over what might otherwise occur, but building 2,600 homes is unlikely to bring down the absolute number of car journeys. Sadly, practical planning consultants know what hours can be wasted at Inquiries with Barristers playing around with such points, so it is best to be clear. □ Our first problem with soundness against this background is that the second bullet point in H1 says "the majority of this provision will be on previously developed land". We say, as we do throughout these representations, that the document is unsound if it does not deal with the question of derelict or underused land which may or may not fall within the definition of previously developed land on the view of a particular decision-maker. □ The second problem of soundness is that the reasoned justification and table seem to indicate that all provision will be on previously developed land, certainly in the first 10 years, whilst H1 says the "majority", which is only 51%. □ If what is being said is that some of the existing commitments are not brownfield then the vision and the strategy are unsound because this is not brought out and not made clear. These also raise questions of soundness in regard to the overall community strategy and approach. Similar questions are raised by the always worrying reference to certain school sites coming available. □ There can be little doubt in any experienced planner's mind about the public cynicism regarding the whole governmental process in this country engendered in so many areas by policies applied to others appearing to be set aside when Authorities come to re-develop their own land This applies most notably to school sites which are often valued by the community as centres for a wide range of activities, or as largely open land, but which seem to be developed after decisions the community can barely influence at all. □ We</p> |

respectfully suggest that the document here is inchoate on that matter and should spell out in far greater detail what is implied. □ Not surprisingly we also feel it is unsound to include broad indications which may not provide for the re-use of an under-used site on the edge of Old Sompting, and trapped by the main road. Such a site should be indicated in the broad potential locations. □ It seems unsound to appear to say at the same time that a future document will deal with the arguments and details yet the broad indications of locations will be set now. □ Proposed changes to stimulate discussion at this stage are that the second bullet point should have a second sentence reading “the majority of this provision will be on previously developed, unused or under-used land, with approximately 80% being on sites in Shoreham-by-Sea ... and approximately 20% being in Lancing and Sompting (including Old Sompting).” □ The fourth bullet point, second sentence, to say “the main broad locations with potential are on land west of Sompting (including Old Sompting) ... Genuinely open greenfield land sites will only be released if housing provision does not come forward at the anticipated rate during the Plan period but derelict or unused sites, especially ones with no other beneficial use, will be welcomed at an early date.” □ We respectfully submit that the issues raised by us, and the need to provide a suitable visionary framework for derelict and under-used land within a Conservation Area in a South Eastern District with limited land, is of such materiality that it merits oral discussion. We also respectfully submit that the issues involved will benefit from the give-and-take of oral examination. Finally, we respectfully submit that the issues we are raising may be of wide importance to the Core Strategy of the District. □

Dr Malcolm Bell Ltd M

Bell

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certain school sites coming available. □ There can be little doubt in any experienced planner's mind about the public cynicism regarding the whole governmental process in this country engendered in so many areas by policies applied to others appearing to be set aside when Authorities come to re-develop their own land. This applies most notably to school sites which are often valued by the community as centres for a wide range of activities, or as largely open land, but which seem to be developed after decisions the community can barely influence at all. □ We respectfully suggest that the document here is inchoate on that matter and should spell out in far greater detail what is implied. □ Not surprisingly we also feel it is unsound to include broad indications which may not provide for the re-use of an under-used site on the edge of Old Sompting, and trapped by the main road. Such a site should be indicated in the broad potential locations. □ It seems unsound to appear to say at the same time that a future document will deal with the arguments and details yet the broad indications of locations will be set now. □ Proposed changes to stimulate discussion at this stage are that the second bullet point should have a second sentence reading "the majority of this provision will be on previously developed, unused or under-used land, with approximately 80% being on sites in Shoreham-by-Sea ... and approximately 20% being in Lancing and Sompting (including Old Sompting)." □ The fourth bullet point, second sentence, to say "the main broad locations with potential are on land west of Sompting (including Old Sompting) ... Genuinely open greenfield land sites will only be released if housing provision does not come forward at the anticipated rate during the Plan period but derelict or unused sites, especially ones with no other beneficial use, will be welcomed at an early date." □ We respectfully submit that the issues raised by us, and the need to provide a suitable visionary framework for derelict and under-used land within a Conservation Area in a South Eastern District with limited land, is of such materiality that it merits oral discussion. We also respectfully submit that the issues involved will benefit from the give-and-take of oral examination. Finally, we respectfully submit that the issues we are raising may be of wide importance to the Core Strategy of the District. □

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| South Downs Joint | N J | Belderson | 106 7 | 31 H1 Providing N | The Joint Committee notes that all proposals for new residential development will be considered on the basis of a sequential test and the impact on the surrounding area. However, the Joint Committee is still concerned that there should be a caveat linking with the protection of employment sites in Policy E1 and that there should be a specific presumption against greenfield residential development within the AONB, other than to meet an identified need for affordable housing, and that any development adjacent to the AONB should include measures to mitigate the impact on the AONB. |
| Home Builders Fede | Pete | Errington | 121 4 | 31 H1 Providing N | The HBF object to the following highlighted criteria in the policy: □ "2,600 new homes will be built in the district between 2006 and 2026 at an annual average rate of 130 dwellings per year, subject to the provision of necessary infrastructure. This target will be achieved by: □ • Existing commitments" □ Tests of soundness that apply: iv □ Change Sought □ The above text should be deleted from the policy due to recognition of the following; □ "In determining how much land is required, Local Planning Authorities should not include sites for which they have granted planning permission unless they can demonstrate, based upon robust evidence, that the sites are developable and are likely to contribute to housing delivery at the point envisaged" (PPS3 paragraph 58). □ |
| Dr Malcolm Bell Ltd | M | Bell | 86 7 | 31 H1 Providing N | □ We object passim, but especially to the 2nd and 4th bullet points of Policy H1. □ In our representations on the Draft Core Strategy Preferred Options Stage in regard to the comparable part of the document, we made what we thought were important and useful points. These have not been followed but we feel they are important to the soundness of the document. □ We call attention firstly, please, to the front-end-loaded submissions made in discussions and the overarching points submitted as part of this representation but not pointlessly repeated within each representation. [Note on 1st March : this was one way we tried not to repeat words within each representation but it looks like we may have to carry it into each.] □ At the Preferred Option Stage we said in Representation 10: □ Broad support for the approach but scepticism about the sufficiency of appropriate brownfield sites. Depending on how one defines it then not all "greenfield" sites (p.78 last para of justification) would necessarily have negative aspects. This is an assumption too far and leads to wrong reasoning. Nor would all greenfield sites necessarily be more car dependent than brownfield sites. □ Specific objection to policy H1 para 3 which should say "the focus of this provision will be made on previously developed, derelict, despoiled, unused or under-used land |

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South Eastern Plann G Gray 128 7 31 H1 Providing N

These submission seek to question the soundness of the general spatial strategy for new homes within the District outlined in paragraph 6.1 and policy H1. In general terms, the desire of the Core Strategy to, in the short term, limit any allocations of greenfield housing to allow monitoring of the rate at which previously developed and brownfield land within the built up area comes forward is an appropriate strategy. However, there is a recognition in the Core Strategy that the rate at which brownfield land within the urban area will potentially come forward could, in the later Plan period, fall below required rates such as to cause shortages in housing land supply. The approach of the Plan therefore to potentially making provision for greenfield allocations in the later Plan period, depending on monitoring,

is broadly supported. Nonetheless, it is felt that the limitation of restricting a search for greenfield allocations to land between Sompting to the west and Lancing to the east unjustified and too restrictive. In the view of the writer this unnecessarily excludes potentially looking at the sites on the western side of Shoreham where suitable land does exist to allow a modest urban extension to take place. On this point, we have previously made representations (as part of the preparation of the Draft Allocations Document) highlighting the availability of land on the western side of the A283 Steyning Road. A copy of these representations dating from the 20th October 2006 are appended. The exclusion of any western expansion of Shoreham in the longer term implied by policy H1 is considered unsound and unjustified by empirical evidence. Land on the western side of Shoreham appears to have been passed over in terms of consideration of longer term development on the basis of the Strategic Flood Risk Assessment January 2007 prepared as a background document to the Core Strategy. This Flood Risk Assessment approaches the matter in only very general terms and relies heavily on Environment Agency indicative Flood Plain maps. Whilst some of the land on the western side of Shoreham has historically been the subject of tidal river flooding this flooding risk was alleviated many years ago by substantial embankment works to the River Adur. The result is that land on the western side of Shoreham has not, been the subject to subsequent flooding since substantive bank protection works were completed. It is intended that my client will undertake further specialist Flood Risk Assessment work concerning land on the western side of Shoreham in order to demonstrate that its inclusion within Flood Zone 3a should not inhibit or preclude potential future greenfield allocations in this area. It is hoped that this further submission will be available shortly. The thrust of these representations therefore is to challenge the soundness of indicating that if greenfield allocations are required in the later Plan period that these should automatically take place on land between Sompting and Lancing. This unnecessarily rules out the option of a westward expansion to Shoreham, an option that should be kept open at this early stage in formulating a strategy for the long term growth of the District. 14.3.07

Dr Malcolm Bell Ltd M

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31 H1 Providing N

We object passim, but especially to the 2nd and 4th bullet points of Policy H1. In our representations on the Draft Core Strategy Preferred Options Stage in regard to the comparable part of the document, we made what we thought were important and useful points. These have not been followed but we feel they are important to the soundness of the document. We call attention firstly, please, to the front-end-loaded submissions made in discussions and the overarching points submitted as part of this representation but not pointlessly repeated within each representation. [Note on 1st March : this was one way we tried not to repeat words within each representation but it looks like we may have to carry it into each.] At the Preferred Option Stage we said in Representation 10: Broad support for the approach but scepticism about the sufficiency of appropriate brownfield sites. Depending on how one defines it then not all "greenfield" sites (p.78 last para of justification) would necessarily have negative aspects. This is an assumption too far and leads to wrong reasoning. Nor would all greenfield sites necessarily be more car dependent than brownfield sites. Specific objection to policy H1 para 3 which should say "the focus of this provision will be made on previously developed, derelict, despoiled, unused or under-used land within or adjacent to settlements up to 2018". In Representation 11 we said : Support broad principle but perceive conflict with spatial strategy. On p.20 this talks about moving from brownfield to greenfield land. In what is generally an extremely well written document this policy, we think, has problems with its English. Is it saying that priority will be given to the use of previously developed land which also meets bullet point criteria?. Alternatively it may need to say "...given to the use of sites which are on previously developed land and ...". This policy would seem to exclude the rural brownfields. Is it intended they should conflict? As throughout we believe it should allow for under-used etc land; particularly where it can fulfil the other objectives. A technical practical planner's objection is that it is almost impossible to judge that all new residential development will itself "reduce the need to travel by car". It may offer the best possibility. It may reduce the need over what might otherwise occur, but building 2,600 homes is unlikely to bring down the absolute number of car journeys. Sadly, practical planning consultants know what hours can be wasted at Inquiries with Barristers playing around with such points, so it is best to be clear. Our first problem with soundness against this background is that the second bullet point in H1 says "the majority of this provision will be on previously developed land". We say, as we do throughout these representations, that the document is unsound if it does not deal with the question of derelict or underused land which may or may

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| BBP Regeneration | Rob | Bennett | 115 | 9 | 31 | H1 Providing N | Policy H1 is also deemed to fail Test of Soundness #9 by not being sufficiently flexible to deal with changing circumstances, i.e. the need to accommodate a far greater quantum of homes in line with the comprehensive regeneration of Shoreham Maritime. This regeneration scheme will also provide for new employment opportunities for local people, improved infrastructure, and a review of Port-related activities, and may require a greater amount of residential development in order to achieve a sustainable balance of homes and local jobs. There could also be an agreed reallocation between districts within the county. See further comments relative to Test 7 above. |
| Michael Cox Associa | Michael | Cox | 116 | 7 | 32 | 11.10 | See below |
| Michael Cox Associa | Michael | Cox | 116 | 4 | 32 | 11.10 | See below |
| Michael Cox Associa | Michael | Cox | 116 | 9 | 32 | 11.10 | The identified need for affordable homes could be met by the early release of land at New Monks Farm. There is no reason for a shortfall in provision. This would enable the suggested threshold of 10 units to be raised to the level suggested in PPS3. Development at New Monks Farm would deliver the full range of affordable accommodation in sustainable blocks rather than scattered in isolated pockets throughout the urban area. This would benefit the management of the homes by registered social landlords |
| Shoreham Society | Bob | Cranmore | 133 | 7 | 32 | 11.10 | Affordable Housing: the estimate of a need for 394 affordable homes a year may be exaggerated, but is far in excess of the 50 that are planned as a target. We feel that one aim should be to re-house the some 50 families now housed in caravans on Golden sands in Lancing, so that these may revert to holiday uses. |

| <i>Organisation</i> | <i>Forename</i> | <i>Surname</i> | <i>ID S'nes</i> | <i>Pg Paragraph</i> | <i>Comments</i> |
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| Michael Cox Associa | Michael | Cox | 116 4 | 33 11.15 | See below |
| Michael Cox Associa | Michael | Cox | 116 7 | 33 11.15 | See below |
| Michael Cox Associa | Michael | Cox | 116 9 | 33 11.15 | PPS3 emphasises the need to achieve an appropriate mix of market and affordable housing. Equally the mix of affordable housing by size and tenure should reflect local circumstances. Stress is placed upon the provision of family homes as well as apartments. Urban redevelopment schemes at densities of over 70 dwellings per hectare will not deliver family homes. A strategic allocation at New Monks Farm will cater for all sectors of the community. |
| Dr Malcolm Bell Ltd | M | Bell | 86 9 | 33 H2 Securing Aff | <p>□</p> <p>In our representations on the Draft Core Strategy Preferred Options Stage in regard to the comparable part of the document, we made what we thought were important and useful points. These have not been followed but we feel they are important to the soundness of the document. □ We call attention firstly, please, to the front-end-loaded submissions made in discussions and the overarching points submitted as part of this representation but not pointlessly repeated within each representation. [Note on 1st March : this was one way we tried not to repeat words within each representation but it looks like we may have to carry it into each.] □ At the Preferred Option Stage we said the following : □ These can most helpfully be taken together. On H3 we hope to assist by pointing out that the last paragraph might just be clarified to say that it is 67% of the affordable housing (not of all housing) if that is what is intended. □ On H4 we note that it "generally" seeks to secure those densities but think it should make clear that there might be cases, such as Conservation Areas or other special sites, where this will not be desirable. You rightly acknowledge the Sustainability Appraisal indicates that high densities can have a negative impact on a town and landscape and long-standing principles of good design should not always be nudged out by present need for large housing numbers to be announced to parliament on small areas of land. □ The second paragraph might better begin "the highest". It could suggest that even higher densities would be sought on those sites. Again, it is a very good indication of what would be sought but the overall caveat about specific site requirements should pertain here also. □ The third paragraph is almost wholly welcome and excellently aspirational. Again a practical planner, however, foresees cases where the high standard of design and construction might conflict with an interpretation of promoting sustainable communities which seeks a mix of housing. □ H2 and H3 are best read together. Particular comment at this stage is that there is an unsoundness in that the Spatial Vision objected to above looks to the ordinary reader, and indeed to these readers, as if it seeks all housing to be at higher densities yet paragraph 11.16 accepts the reality that this is not always so and not always appropriate. It makes planning look bad in the eyes of the lay public when they are viewing a particular development affecting them and find apparent conflict between aspiration and detail. They deserve better of us. □ The greater point of unsoundness however is that this inchoate and conflicting wording and tone reflects a serious deficiency. That deficiency feeds back to the strategy and vision which does not accord sufficient regard to the need simply to make the area better and deal with long term dereliction and under-use. □ In 11.16 it is going too far, with respect, to say "in exceptional circumstances". This also seems to set a pointless sub test which could keep learned gentlemen and ladies busy for days. It is enough that the unique character of the particular area, particularly Conservation Areas which should be mentioned by name, may require a design-led rather than density-led approach. To add some kind of sub-test that the design may be wonderful but is it an exceptional enough case? (or in words in Policy H3 itself, of "unique character") is likely to lead to a debate over words rather than substance. □ We suggest the reasoned justification should be careful not to set tests. The test in H3 should never say "all" in the first sentence and then set an exception to it in the second sentence. That is fundamentally unsound. □ The opening should be "a minimum density for new housing developments will be 35 dwellings per hectare where appropriate. In and adjacent to conservation areas the special character of the area will be the predominant consideration and higher or lower densities may be appropriate".</p> <p>□ □</p> <p>An unsoundness which leads to these conflicts is the inappropriate lack of regard throughout the document to stimulating and welcoming schemes of positive enhancement for areas of historic character and conservation areas in particular. Such aims must not be frustrated by potential conflict with other policies. That would be</p> |

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| Dr Malcolm Bell Ltd | M | Bell | | 86 | 6 | 33 H2 Securing Aff □ | <p>In our representations on the Draft Core Strategy Preferred Options Stage in regard to the comparable part of the document, we made what we thought were important and useful points. These have not been followed but we feel they are important to the soundness of the document.□ We call attention firstly, please, to the front-end-loaded submissions made in discussions and the overarching points submitted as part of this representation but not pointlessly repeated within each representation. [Note on 1st March : this was one way we tried not to repeat words within each representation but it looks like we may have to carry it into each.]□ At the Preferred Option Stage we said the following :□ These can most helpfully be taken together. On H3 we hope to assist by pointing out that the last paragraph might just be clarified to say that it is 67% of the affordable housing (not of all housing) if that is what is intended.□ On H4 we note that it "generally" seeks to secure those densities but think it should make clear that there might be cases, such as Conservation Areas or other special sites, where this will not be desirable. You rightly acknowledge the Sustainability Appraisal indicates that high densities can have a negative impact on a town and landscape and long-standing principles of good design should not always be nudged out by present need for large housing numbers to be announced to parliament on small areas of land. □ The second paragraph might better begin "the highest". It could suggest that even higher densities would be sought on those sites. Again, it is a very good indication of what would be sought but the overall caveat about specific site requirements should pertain here also. □ The third paragraph is almost wholly welcome and excellently aspirational. Again a practical planner, however, foresees cases where the high standard of design and construction might conflict with an interpretation of promoting sustainable communities which seeks a mix of housing. □ H2 and H3 are best read together. Particular comment at this stage is that there is an unsoundness in that the Spatial Vision objected to above looks to the ordinary reader, and indeed to these readers, as if it seeks all housing to be at higher densities yet paragraph 11.16 accepts the reality that this is not always so and not always appropriate. It makes planning look bad in the eyes of the lay public when they are viewing a particular development affecting them and find apparent conflict between aspiration and detail. They deserve better of us.□ The greater point of unsoundness however is that this inchoate and conflicting wording and tone reflects a serious deficiency. That deficiency feeds back to the strategy and vision which does not accord sufficient regard to the need simply to make the area better and deal with long term dereliction and under-use.□ In 11.16 it is going too far, with respect, to say "in exceptional circumstances". This also seems to set a pointless sub test which could keep learned gentlemen and ladies busy for days. It is enough that the unique character of the particular area, particularly Conservation Areas which should be mentioned by name, may require a design-led rather than density-led approach. To add some kind of sub-test that the design may be wonderful but is it an exceptional enough case? (or in words in Policy H3 itself, of "unique character") is likely to lead to a debate over words rather than substance.□ We suggest the reasoned justification should be careful not to set tests. The test in H3 should never say "all" in the first sentence and then set an exception to it in the second sentence. That is fundamentally unsound.□ The opening should be "a minimum density for new housing developments will be 35 dwellings per hectare where appropriate. In and adjacent to conservation areas the special character of the area will be the predominant consideration and higher or lower densities may be appropriate".</p> <p>□ □</p> <p>An unsoundness which leads to these conflicts is the inappropriate lack of regard throughout the document to stimulating and welcoming schemes of positive enhancement for areas of historic character and conservation areas in particular. Such aims must not be frustrated by potential conflict with other policies. That would be unsound.□ We respectfully submit that the issues raised by us, and the need to provide a suitable visionary</p> |

Organisation Forename Surname ID S'nes Pg Paragraph Comments

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| Planning Potential | Alastair | Close | 123 | 4 | 33 | H2 Securing Aff | This policy is considered unreasonable and inflexible and does not fully accord with the objectives and advice within PPS3. particularly in respect of the requirement for 67% of affordable units to be socially rented. PPS3 (paragraphs 26 and 29) clearly indicate that local authorities should be more realistic when considering what constitutes affordable housing. Whilst paragraph 26 acknowledges the role that low cost market housing can play in satisfying an identified local need, paragraph 29 further requires LPAs to consider the economic viability of being able to deliver affordable units within a scheme. It is quite clear from the Submission Core Strategy that developers will be expected to undertake significant infrastructure improvements, although the precise nature is not set. Therefore to set unreasonable ratios of affordable housing provision, such as those set out in policy H2, may render future and innovative schemes unviable, ultimately adversely impacting upon the wider objectives of the Council.□ We would wish to see this policy amended so as not to be so prescriptive, acknowledging that there are instances that allow for a greater degree of flexibility and innovation. |
| Planning Potential | Alastair | Close | 123 | 6 | 33 | H2 Securing Aff | This policy is considered unreasonable and inflexible and does not fully accord with the objectives and advice within PPS3. particularly in respect of the requirement for 67% of affordable units to be socially rented. PPS3 (paragraphs 26 and 29) clearly indicate that local authorities should be more realistic when considering what constitutes affordable housing. Whilst paragraph 26 acknowledges the role that low cost market housing can play in satisfying an identified local need, paragraph 29 further requires LPAs to consider the economic viability of being able to deliver affordable units within a scheme. It is quite clear from the Submission Core Strategy that developers will be expected to undertake significant infrastructure improvements, although the precise nature is not set. Therefore to set unreasonable ratios of affordable housing provision, such as those set out in policy H2, may render future and innovative schemes unviable, ultimately adversely impacting upon the wider objectives of the Council.□ We would wish to see this policy amended so as not to be so prescriptive, acknowledging that there are instances that allow for a greater degree of flexibility and innovation. |
| Planning Potential | Alastair | Close | 123 | 9 | 33 | H2 Securing Aff | This policy is considered unreasonable and inflexible and does not fully accord with the objectives and advice within PPS3. particularly in respect of the requirement for 67% of affordable units to be socially rented. PPS3 (paragraphs 26 and 29) clearly indicate that local authorities should be more realistic when considering what constitutes affordable housing. Whilst paragraph 26 acknowledges the role that low cost market housing can play in satisfying an identified local need, paragraph 29 further requires LPAs to consider the economic viability of being able to deliver affordable units within a scheme. It is quite clear from the Submission Core Strategy that developers will be expected to undertake significant infrastructure improvements, although the precise nature is not set. Therefore to set unreasonable ratios of affordable housing provision, such as those set out in policy H2, may render future and innovative schemes unviable, ultimately adversely impacting upon the wider objectives of the Council.□ We would wish to see this policy amended so as not to be so prescriptive, acknowledging that there are instances that allow for a greater degree of flexibility and innovation. |
| Home Builders Fede | Pete | Errington | 121 | 6 | 33 | H2 Securing Aff | Firstly the HBF object to the use of a 10 unit threshold and consider that no supporting evidence has been stated to substantiate this requirement. Secondly we also object to the requirement for a financial contribution towards affordable housing to be required on a pro-rata basis on developments of fewer than 10 dwellings. This is obviously not in accordance with the national indicative threshold and is not clearly supported again by an up to date local evidence base to support the deviation from national policy guidance, which demonstrates that due consideration has been given to the viability consequences of this policy. □ Change sought□In relation to the first point the HBF suggest that the dwelling threshold should remain at 15 units until the local planning authority can robustly justify the proposed alternative measures in relation to the following: □ "In Local Development Documents, Local Planning |

| Organisation | Forename | Surname | ID | S'nes | Pg | Paragraph | Comments |
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| | | | | | | | Authorities should:☐– Set an overall (i.e. plan-wide) target for the amount of affordable housing to be provided. The target should reflect the new definition of affordable housing in this PPS. It should also reflect an assessment of the likely economic viability of land for housing within the area, taking account of risks to delivery and drawing on informed assessments of the likely levels of finance available for affordable housing, including public subsidy and the level of developer contribution that can reasonably be secured. Local Planning Authorities should aim to ensure that provision of affordable housing meets the needs of both current and future occupiers, taking into account information from the Strategic Housing Market Assessment” (PPS3 paragraph 29).☐ |
| RPS Planning on be | Rebecca | Caines | 104 | 4 | 33 | H2 Securing Aff | FNH object to the requirement on sites of 10 or more dwellings an affordable housing provision of 35% will be sought. This could have a detrimental effect on the viability of development and may prohibit housing development in the area, if applied inflexibly without having the regard to the merits of each case. FNH therefore, request that the policy allows for due consideration to be given to the specific circumstances of each site including economic viability, when negotiating the provision of affordable housing.☐ FNH consider that any specific requirement for affordable housing should be indicative and should be open to negotiation to accord with current Government guidance in Circular 6/98. This states that an element of affordable housing should be sought on suitable sites through negotiation and policies for affordable housing should set “indicative” targets for specific sites.☐ National policy guidance makes it clear that there are a number of considerations that should be taken into account when determining the appropriate level of affordable housing on any particular site. PPG3 states that Local Planning Authorities should work with developers to achieve realistic assumptions on levels of public subsidy for affordable housing, having regard to site costs, and therefore the amount of affordable housing that can be provided viably. Planning Policy Statement 3 on housing provides the context for achieving high quality and sustainable housing and the relevant types of housing required. Local Planning Authorities, however, are not required to have regard to the statement as a material consideration, when making decisions on planning applications until 1st April 2007. Whilst the local planning authority should not have regard to PPS3 for material consideration until 1st April 2007, the policy guidance should therefore should at least still be identified and reported on in this Core Strategy document. In the interim, Planning Policy Guidance 3 is still of material relevance.☐ PPS3 states in paragraph 29 that the national indicative minimum size threshold is 15 dwellings It goes onto state that Local Authorities will have to undertake an informed assessment of the economic viability of any thresholds and proportions of affordable housing proposed.☐ Therefore, any policy should make it clear that each case will be treated on its merits having regard to such criteria and the Council's objective for providing affordable housing based on an up to date Housing Needs Assessment.☐ ☐ |
| Home Builders Fede | Pete | Errington | 121 | 4 | 33 | H2 Securing Aff | Firstly the HBF object to the use of a 10 unit threshold and consider that no supporting evidence has been stated to substantiate this requirement. Secondly we also object to the requirement for a financial contribution towards affordable housing to be required on a pro-rata basis on developments of fewer than 10 dwellings. This is obviously not in accordance with the national indicative threshold and is not clearly supported again by an up to date local evidence base to support the deviation from national policy guidance, which demonstrates that due consideration has been given to the viability consequences of this policy. ☐ Change sought☐ In relation to the first point the HBF suggest that the dwelling threshold should remain at 15 units until the local planning authority can robustly justify the proposed alternative measures in relation to the following: ☐ “In Local Development Documents, Local Planning Authorities should:☐– Set an overall (i.e. plan-wide) target for the amount of affordable housing to be provided. The target should reflect the new definition of affordable housing in this PPS. It should also reflect an assessment of the likely economic viability of land for housing within the area, taking account of risks to delivery and drawing on informed assessments of the likely levels of finance available for affordable housing, including public subsidy and the level of developer contribution that can reasonably be secured. Local Planning Authorities should aim to ensure that provision of affordable housing meets the needs of both current and future occupiers, taking into account information from the Strategic Housing Market Assessment” (PPS3 paragraph 29).☐ |
| BBP Regeneration | Rob | Bennett | 115 | 7 | 33 | H2 Securing Aff | PPS3 advocates that the balance between affordable and market housing, as well as the mix of various types of |

affordable housing, should be determined by Local Planning Authorities based on evidence and analysis from a Strategic Housing Market Assessment (HMA). The Core Strategy however highlights that a Strategic HMA has not yet been undertaken in the wider area and the current Policy is therefore based on the more narrowly focused Housing Needs Survey – which does not meet the evidential criteria laid out in PPS3. Furthermore, SEEDA's and other public sector partners' goals, are to achieve a comprehensive, sustainable, mixed-use development through the regeneration of Shoreham Harbour - partly by introducing a better balance between housing and local jobs, and also by introducing a wide variety of affordable housing types. A review of the existing Shoreham Maritime Vision is currently being undertaken by SEEDA and its consultants, in conjunction with the Port, including a review of employment, housing levels, densities and timing of infrastructure. By Summer 2007, SEEDA will have produced a Delivery Plan for Shoreham Maritime, which will assess the levels of affordable housing to be delivered in the area, and in particular the proposed balance of intermediate to social rented housing which is appropriate within the site, in order to meet the overall objectives. It should also be noted, that it is the intention of all public sector partners, that a joint Area Action Plan (Adur and Brighton & Hove Councils) be formulated for Shoreham Harbour and its immediately adjacent hinterland, as soon as possible. SEEDA therefore contends that in cases where the planning context for an area is to be covered by an Area Action Plan, then this would be the most appropriate DPD within which to set targets for the mix of affordable housing. SEEDA does not therefore object to a District-wide overall target of 35% affordable housing at this time, but believes that: this figure needs to be reviewed in the light of evidence arising from the completion of an early Strategic Housing Market Assessment, to be undertaken into the wider sub regional area the appropriate figure for Shoreham Harbour should be specifically defined in the Joint AAP the appropriate balance between intermediate and socially rented accommodation should also be left for the Joint AAP to define. SEEDA proposes to make more detailed representations at the time of the Core Strategy EIP and the Area Action Plan H2 therefore fails Test of Soundness #7 by not relying on / referencing a robust and credible evidence base, but instead a Housing Needs Survey which does not meet the evidential criteria laid out in PPS3. SEEDA therefore proposes the following change to Policy H2: "In order to address the need for affordable housing in the district and to secure more balanced communities the following will be sought: A minimum of 35% affordable housing on site from new residential developments (subject to relevant evidence provided by the forthcoming Strategic Housing Market Assessment) and ensure that these are genuinely affordable to those in housing need. Such housing will be sought from developments of 10 dwellings or more, unless it can be demonstrated that the exceptional circumstances of the site make it unviable to do so; A mix of affordable housing tenures, with a proportion being for social rented accommodation; In the case of an Area Action Plan, both the levels of affordable housing and the mix of affordable housing tenures are to be specifically determined on a site-by-site basis in the light of the evidence from local market research and the forthcoming Strategic Housing Market Assessment; A financial contribution to affordable housing should be made on a pro rata basis on developments of fewer than 10 dwellings..."

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| BBP Regeneration | Rob | Bennett | 115 | 9 | 33 | H2 Securing Aff Policy H2 also fails Test of Soundness #9 by not being sufficiently flexible to deal with changing circumstances, i.e. the forthcoming regeneration of Shoreham Maritime. See further comments relative to Test 7 above. |
| DMH Stallard | Helen | Keegan | 101 | 4 | 33 | H2 Securing Aff We are writing on behalf of Crest Nicholson (South East) Ltd to object to policy H2 of the 'Preferred Options Core Strategy'. We do not consider this policy to be sound in respect of: Test 4 'it is a spatial plan which is consistent with National Planning Policy and in general conformity with the Regional Spatial Strategy (RSS) for the region or the Spatial Development Strategy (SDS) if in London, and it has properly had regard to any other relevant plans, policies and strategies relating to the area or to adjoining area', and; Test 7 'The strategies/policies/allocations represent the most appropriate in all the circumstances, having considered the relevant alternative, and they are founded on a robust and credible evidence base', for the reasons set out below: The size of sites to be allocated for affordable housing (10 units) is not in compliance with national policy, and relevant alternatives have not been adequately considered The evidence that the need for affordable housing is based on (Housing Strategy 2005-2010), is out of date and therefore not robust and credible There is no provision within the affordable housing limits for the provision of intermediate affordable housing and therefore this is not the most appropriate solution in all |

the circumstances. □ □ Para 11.10 (Policy H2) □ The most up to date Housing Strategy runs from 2005-2010, and the affordable housing need for the draft Core Strategy has been based on this document. We consider this to be out of date, and therefore the policy fails to meet Test 7 that it is not founded on a robust and credible evidence base. □ The Housing Strategy recognises the need for it to be up to date and states that a revision should be published every year. The time delay between the 2005 figures, and the need in 2006 and 2007 may differ, and therefore it is inappropriate to base the housing needs on this out of date document. □ Policy H2 □ A threshold of 10 dwellings has been suggested for the provision of affordable housing. We consider that this fails the soundness tests based on Test 4, that it is not consistent with National Planning Policy, and Test 7 that relevant alternatives have not been adequately considered. □ PPS3 states: 'The national indicative minimum site size threshold is 15 dwellings.' □ Although we recognise that Local Authorities are able to set lower thresholds, it is not considered that in this case there is sufficient justification as to why this has occurred. □ Furthermore the alternative of 'setting different proportions of affordable housing to be sought for a series of site-size thresholds over the plan area' (from PPS3) has not been adequately considered to allow the sufficient consideration of this option. □ Policy H2 and paragraph 11.9 □ Policy H2 does not provide for 'intermediate housing', as recommended in PPS3 and 'Delivering Affordable Housing' Policy Statement published by DCLG. □ PPS3 defines this as: □ 'Housing at prices and rents above those of social rent, but below market price or rents, and which meet the criteria set out above. These can include shared equity products (eg HomeBuy), other low cost homes for sale and intermediate rent.' □ The draft Core Strategy policy does not account for provision of these homes in its definition of affordable housing (paragraph 11.9) and therefore policy H2 does not represent the most appropriate option in these circumstances. □ I look forward to confirmation of receipt of these representations, and an indication that they are receiving your consideration. □

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| DMH Stallard | Helen Keegan | 101 7 | 33 H2 Securing Aff | <p>We are writing on behalf of Crest Nicholson (South East) Ltd to object to policy H2 of the 'Preferred Options Core Strategy'. We do not consider this policy to be sound in respect of: □ Test 4 'it is a spatial plan which is consistent with National Planning Policy and in general conformity with the Regional Spatial Strategy (RSS) for the region or the Spatial Development Strategy (SDS) if in London, and it has properly had regard to any other relevant plans, policies and strategies relating to the area or to adjoining area', and; □ Test 7 'The strategies/policies/allocations represent the most appropriate in all the circumstances, having considered the relevant alternative, and they are founded on a robust and credible evidence base', □ for the reasons set out below: □ • □ The size of sites to be allocated for affordable housing (10 units) is not in compliance with national policy, and relevant alternatives have not been adequately considered □ • □ The evidence that the need for affordable housing is based on (Housing Strategy 2005-2010), is out of date and therefore not robust and credible □ • □ There is no provision within the affordable housing limits for the provision of intermediate affordable housing and therefore this is not the most appropriate solution in all the circumstances. □ □ Para 11.10 (Policy H2) □ The most up to date Housing Strategy runs from 2005-2010, and the affordable housing need for the draft Core Strategy has been based on this document. We consider this to be out of date, and therefore the policy fails to meet Test 7 that it is not founded on a robust and credible evidence base. □ The Housing Strategy recognises the need for it to be up to date and states that a revision should be published every year. The time delay between the 2005 figures, and the need in 2006 and 2007 may differ, and therefore it is inappropriate to base the housing needs on this out of date document. □ Policy H2 □ A threshold of 10 dwellings has been suggested for the provision of affordable housing. We consider that this fails the soundness tests based on Test 4, that it is not consistent with National Planning Policy, and Test 7 that relevant alternatives have not been adequately considered. □ PPS3 states: 'The national indicative minimum site size threshold is 15 dwellings.' □ Although we recognise that Local Authorities are able to set lower thresholds, it is not considered that in this case there is sufficient justification as to why this has occurred. □ Furthermore the alternative of 'setting different proportions of affordable housing to be sought for a series of site-size thresholds over the plan area' (from PPS3) has not been adequately considered to allow the sufficient consideration of this option. □ Policy H2 and paragraph 11.9 □ Policy H2 does not provide for 'intermediate housing', as recommended in PPS3 and 'Delivering Affordable Housing' Policy Statement published by DCLG. □ PPS3 defines this as: □ 'Housing at prices and rents above those of social rent, but below market price or rents, and which meet the criteria set out above. These can</p> |
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| South East England | Catriona | Riddell | 117 | 4 | 33 H2 Securing Aff The definition of 'affordable housing' in Policy H2 or in the glossary should clarify that such housing is subject to mechanisms that will ensure the housing remains affordable in perpetuity to be consistent with the definition in the supporting text to Policy H4 of the draft South East Plan. This is also in accordance with the definition of affordable housing in PPS3. |
| Dr Malcolm Bell Ltd | M | Bell | 86 | 8 | 33 H2 Securing Aff □ In our representations on the Draft Core Strategy Preferred Options Stage in regard to the comparable part of the document, we made what we thought were important and useful points. These have not been followed but we feel they are important to the soundness of the document.□ We call attention firstly, please, to the front-end-loaded submissions made in discussions and the overarching points submitted as part of this representation but not pointlessly repeated within each representation. [Note on 1st March : this was one way we tried not to repeat words within each representation but it looks like we may have to carry it into each.]□ At the Preferred Option Stage we said the following :□ These can most helpfully be taken together. On H3 we hope to assist by pointing out that the last paragraph might just be clarified to say that it is 67% of the affordable housing (not of all housing) if that is what is intended.□ On H4 we note that it "generally" seeks to secure those densities but think it should make clear that there might be cases, such as Conservation Areas or other special sites, where this will not be desirable. You rightly acknowledge the Sustainability Appraisal indicates that high densities can have a negative impact on a town and landscape and long-standing principles of good design should not always be nudged out by present need for large housing numbers to be announced to parliament on small areas of land. □ The second paragraph might better begin "the highest". It could suggest that even higher densities would be sought on those sites. Again, it is a very good indication of what would be sought but the overall caveat about specific site requirements should pertain here also. □ The third paragraph is almost wholly welcome and excellently aspirational. Again a practical planner, however, foresees cases where the high standard of design and construction might conflict with an interpretation of promoting sustainable communities which seeks a mix of housing. □ H2 and H3 are best read together. Particular comment at this stage is that there is an unsoundness in that the Spatial Vision objected to above looks to the ordinary reader, and indeed to these readers, as if it seeks all housing to be at higher densities yet paragraph 11.16 accepts the reality that this is not always so and not always appropriate. It makes planning look bad in the eyes of the lay public when they are viewing a particular development affecting them and find apparent conflict between aspiration and detail. They deserve better of us.□ The greater point of unsoundness however is that this inchoate and conflicting wording and tone reflects a serious deficiency. That deficiency feeds back to the strategy and vision which does not accord sufficient regard to the need simply to make the area better and deal with long term dereliction and under-use.□ In 11.16 it is going too far, with respect, to say "in exceptional circumstances". This also seems to set a pointless sub test which could keep learned gentlemen and ladies busy for days. It is enough that the unique character of the particular area, particularly Conservation Areas which should be mentioned by name, may require a design-led rather than density-led approach. To add some kind of sub-test that the design may be wonderful but is it an exceptional enough case? (or in words in Policy H3 itself, of "unique character") is likely to lead to a debate over words rather than substance.□ We suggest the reasoned justification should be careful not to set tests. The test in H3 should never say "all" in the first sentence and then set an exception to it in the second sentence. That is fundamentally unsound.□ The opening should be "a minimum density for new housing developments will be 35 dwellings per hectare where appropriate. In and adjacent to conservation areas the special character of the area will be the predominant consideration and higher or lower densities may be appropriate". □ □ An unsoundness which leads to these conflicts is the inappropriate lack of regard throughout the document to |

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| | | | | | | | stimulating and welcoming schemes of positive enhancement for areas of historic character and conservation areas in particular. Such aims must not be frustrated by potential conflict with other policies. That would be unsound. □ We respectfully submit that the issues raised by us, and the need to provide a suitable visionary framework for derelict and under-used land within a Conservation Area in a South Eastern District with limited land, is of such materiality that it merits oral discussion. We also respectfully submit that the issues involved will benefit from the give-and-take of oral examination. Finally, we respectfully submit that the issues we are raising may be of wide importance to the Core Strategy of the District. □ |
| Alliance Environment | Christian | Holliday | 120 | 0 | 33 | H2 | Securing Aff |
| Dr Malcolm Bell Ltd | M | Bell | 86 | 7 | 33 | H2 | Securing Aff □ In our representations on the Draft Core Strategy Preferred Options Stage in regard to the comparable part of the document, we made what we thought were important and useful points. These have not been followed but we feel they are important to the soundness of the document. □ We call attention firstly, please, to the front-end-loaded submissions made in discussions and the overarching points submitted as part of this representation but not pointlessly repeated within each representation. [Note on 1st March : this was one way we tried not to repeat words within each representation but it looks like we may have to carry it into each.] □ At the Preferred Option Stage we said the following : □ These can most helpfully be taken together. On H3 we hope to assist by pointing out that the last paragraph might just be clarified to say that it is 67% of the affordable housing (not of all housing) if that is what is intended. □ On H4 we note that it "generally" seeks to secure those densities but think it should make clear that there might be cases, such as Conservation Areas or other special sites, where this will not be desirable. You rightly acknowledge the Sustainability Appraisal indicates that high densities can have a negative impact on a town and landscape and long-standing principles of good design should not always be nudged out by present need for large housing numbers to be announced to parliament on small areas of land. □ The second paragraph might better begin "the highest". It could suggest that even higher densities would be sought on those sites. Again, it is a very good indication of what would be sought but the overall caveat about specific site requirements should pertain here also. □ The third paragraph is almost wholly welcome and excellently aspirational. Again a practical planner, however, foresees cases where the high standard of design and construction might conflict with an interpretation of promoting sustainable communities which seeks a mix of housing. □ H2 and H3 are best read together. Particular comment at this stage is that there is an unsoundness in that the Spatial Vision objected to above looks to the ordinary reader, and indeed to these readers, as if it seeks all housing to be at higher densities yet paragraph 11.16 accepts the reality that this is not always so and not always appropriate. It makes planning look bad in the eyes of the lay public when they are viewing a particular development affecting them and find apparent conflict between aspiration and detail. They deserve better of us. □ The greater point of unsoundness however is that this inchoate and conflicting wording and tone reflects a serious deficiency. That deficiency feeds back to the strategy and vision which does not accord sufficient regard to the need simply to make the area better and deal with long term dereliction and under-use. □ In 11.16 it is going too far, with respect, to say "in exceptional circumstances". This also seems to set a pointless sub test which could keep learned gentlemen and ladies busy for days. It is enough that the unique character of the particular area, particularly Conservation Areas which should be mentioned by name, may require a design-led rather than density-led approach. To add some kind of sub-test that the design may be wonderful but is it an exceptional enough case? (or in words in Policy H3 itself, of "unique character") is likely to lead to a debate over words rather than substance. □ We suggest the reasoned justification should be careful not to set tests. The test in H3 should never say "all" in the first sentence and then set an exception to it in the second sentence. That is fundamentally unsound. □ The opening should be "a minimum density for new housing developments will be 35 dwellings per hectare where appropriate. In and adjacent to conservation areas the special character of the area will be the predominant consideration and higher or lower densities may be appropriate". □ □ An unsoundness which leads to these conflicts is the inappropriate lack of regard throughout the document to stimulating and welcoming schemes of positive enhancement for areas of historic character and conservation areas |

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| | | | | | | | in particular. Such aims must not be frustrated by potential conflict with other policies. That would be unsound. □ We respectfully submit that the issues raised by us, and the need to provide a suitable visionary framework for derelict and under-used land within a Conservation Area in a South Eastern District with limited land, is of such materiality that it merits oral discussion. We also respectfully submit that the issues involved will benefit from the give-and-take of oral examination. Finally, we respectfully submit that the issues we are raising may be of wide importance to the Core Strategy of the District. □ |
| Michael Cox Associa | Michael | Cox | 116 | 7 | 34 | 11.17 | See below |
| Michael Cox Associa | Michael | Cox | 116 | 9 | 34 | 11.17 | See comments in respect of paragraph 11.15 |
| Michael Cox Associa | Michael | Cox | 116 | 4 | 34 | 11.17 | See below |
| Dr Malcolm Bell Ltd | M | Bell | 86 | 8 | 34 | H3 Housing Mix | □ In our representations on the Draft Core Strategy Preferred Options Stage in regard to the comparable part of the document, we made what we thought were important and useful points. These have not been followed but we feel they are important to the soundness of the document. □ We call attention firstly, please, to the front-end-loaded submissions made in discussions and the overarching points submitted as part of this representation but not pointlessly repeated within each representation. [Note on 1st March : this was one way we tried not to repeat words within each representation but it looks like we may have to carry it into each.] □ At the Preferred Option Stage we said the following : □ These can most helpfully be taken together. On H3 we hope to assist by pointing out that the last paragraph might just be clarified to say that it is 67% of the affordable housing (not of all housing) if that is what is intended. □ On H4 we note that it "generally" seeks to secure those densities but think it should make clear that there might be cases, such as Conservation Areas or other special sites, where this will not be desirable. You rightly acknowledge the Sustainability Appraisal indicates that high densities can have a negative impact on a town and landscape and long-standing principles of good design should not always be nudged out by present need for large housing numbers to be announced to parliament on small areas of land. □ The second paragraph might better begin "the highest". It could suggest that even higher densities would be sought on those sites. Again, it is a very good indication of what would be sought but the overall caveat about specific site requirements should pertain here also. □ The third paragraph is almost wholly welcome and excellently aspirational. Again a practical planner, however, foresees cases where the high standard of design and construction might conflict with an interpretation of promoting sustainable communities which seeks a mix of housing. □ H2 and H3 are best read together. Particular comment at this stage is that there is an unsoundness in that the Spatial Vision objected to above looks to the ordinary reader, and indeed to these readers, as if it seeks all housing to be at higher densities yet paragraph 11.16 accepts the reality that this is not always so and not always appropriate. It makes planning look bad in the eyes of the lay public when they are viewing a particular development affecting them and find apparent conflict between aspiration and detail. They deserve better of us. □ The greater point of unsoundness however is that this inchoate and conflicting wording and tone reflects a serious deficiency. That deficiency feeds back to the strategy and vision which does not accord sufficient regard to the need simply to make the area better and deal with long term dereliction and under-use. □ In 11.16 it is going too far, with respect, to say "in exceptional circumstances". This also seems to set a pointless sub test which could keep learned gentlemen and ladies busy for days. It is enough that the unique character of the particular area, particularly Conservation Areas which should be mentioned by name, may require a design-led rather than density-led approach. To add some kind of sub-test that the design may be wonderful but is it an exceptional enough case? (or in words in Policy H3 itself, of "unique character") is likely to lead to a debate over words rather than substance. □ We suggest the reasoned justification should be careful not to set tests. The test in H3 should never say "all" in the first sentence and then set an exception to it in the second sentence. That is fundamentally unsound. □ The opening should be "a minimum density for new housing developments will be 35 dwellings per hectare where appropriate. In and adjacent to conservation areas the special character of the area will be the predominant consideration and higher or lower densities may be appropriate". |

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| | | | | | | | <p>□ □</p> <p>An unsoundness which leads to these conflicts is the inappropriate lack of regard throughout the document to stimulating and welcoming schemes of positive enhancement for areas of historic character and conservation areas in particular. Such aims must not be frustrated by potential conflict with other policies. That would be unsound.□ We respectfully submit that the issues raised by us, and the need to provide a suitable visionary framework for derelict and under-used land within a Conservation Area in a South Eastern District with limited land, is of such materiality that it merits oral discussion. We also respectfully submit that the issues involved will benefit from the give-and-take of oral examination. Finally, we respectfully submit that the issues we are raising may be of wide importance to the Core Strategy of the District.□</p> |
| Home Builders Fede | Pete | Errington | 121 | 4 | 34 | H3 Housing Mix | <p>The HBF object to the requirement for all homes to be built to lifetime homes standards □ Change sought□ This requirement should be deleted from the policy. The HBF consider that the matter of enforcing residential building standards through local planning policy should not be allowed. As this is contrary to the following;□ "Planning policies should not replicate, cut across, or detrimentally affect matters within the scope of other legislative requirements, such as those set out in building regulations" (PPS1 paragraph 30).□ The HBF consider that in any case as the population continues to age and the requirements of the elderly become more prevalent, that appropriate central government action should be taken on this issue through the building regulations in consultation with the house building industry. The HBF believe that this is not an issue for LPA's to influence, it is in any case an optional requirement of the Code for Sustainable Homes. The HBF understands that building to Lifetime Homes standards will increase build costs, and this will potentially have an impact on development viability and delivery if enforced only at the local level. Implementation of improvements to residential building design etc on an industry wide scale would in any case allow standardisation of building practices and economies of scale to be gained in the future. □</p> |
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housing numbers to be announced to parliament on small areas of land. □ The second paragraph might better begin "the highest". It could suggest that even higher densities would be sought on those sites. Again, it is a very good indication of what would be sought but the overall caveat about specific site requirements should pertain here also. □ The third paragraph is almost wholly welcome and excellently aspirational. Again a practical planner, however, foresees cases where the high standard of design and construction might conflict with an interpretation of promoting sustainable communities which seeks a mix of housing. □ H2 and H3 are best read together. Particular comment at this stage is that there is an unsoundness in that the Spatial Vision objected to above looks to the ordinary reader, and indeed to these readers, as if it seeks all housing to be at higher densities yet paragraph 11.16 accepts the reality that this is not always so and not always appropriate. It makes planning look bad in the eyes of the lay public when they are viewing a particular development affecting them and find apparent conflict between aspiration and detail. They deserve better of us. □ The greater point of unsoundness however is that this inchoate and conflicting wording and tone reflects a serious deficiency. That deficiency feeds back to the strategy and vision which does not accord sufficient regard to the need simply to make the area better and deal with long term dereliction and under-use. □ In 11.16 it is going too far, with respect, to say "in exceptional circumstances". This also seems to set a pointless sub test which could keep learned gentlemen and ladies busy for days. It is enough that the unique character of the particular area, particularly Conservation Areas which should be mentioned by name, may require a design-led rather than density-led approach. To add some kind of sub-test that the design may be wonderful but is it an exceptional enough case? (or in words in Policy H3 itself, of "unique character") is likely to lead to a debate over words rather than substance. □ We suggest the reasoned justification should be careful not to set tests. The test in H3 should never say "all" in the first sentence and then set an exception to it in the second sentence. That is fundamentally unsound. □ The opening should be "a minimum density for new housing developments will be 35 dwellings per hectare where appropriate. In and adjacent to conservation areas the special character of the area will be the predominant consideration and higher or lower densities may be appropriate".

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Dr Malcolm Bell Ltd M Bell 86 7 34 H3 Housing Mix □

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RPS Planning on be Rebecca Caines 104 0 34 H3 Housing Mix

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Dr Malcolm Bell Ltd M Bell 86 9 35 H4 Accommoda □

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South Downs Joint N J Belderson 106 7 35 H4 Accommoda The Joint Committee generally supports the Policy, and notes that future proposals for sites will take into account the environmental constraints. However, the landscape/AONB impact should also be taken into account. The Policy

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| | | | | | | | should also acknowledge, but not repeat, Circular 1/06 with regard to sites in nationally recognised landscapes. |
| Dr Malcolm Bell Ltd | M | Bell | 86 | 8 | 35 | H4 Accommoda | □ We call attention firstly, please, to the front-end-loaded submissions made in discussions and the overarching points submitted as part of this representation but not pointlessly repeated within each representation. [Note on 1st March : this was one way we tried not to repeat words within each representation but it looks like we may have to carry it into each.]□ In regard to the derelict under-used land in Sompting we asked the Authority some time ago if temporary use as a traveller site until a higher and better use could be determined through this process was one they would welcome? No reply of value was received.□ The criteria are in themselves unexceptionable but they seem to omit two important ones. Firstly, the owner of the site may be unwilling to make it available. It should be clear whether the Authority would be prepared to go so far as to use compulsory purchase powers to take it, in which case the owner would have recourse to the Section 17 procedure to achieve justice. Secondly, the site allocated, if required, should have regard to its impact on the character of the area particularly areas of designated quality such as Conservation Areas. The bullet point on environmental constraints does not seem to consider that.□ We respectfully submit that the issues raised by us, and the need to provide a suitable visionary framework for derelict and under-used land within a Conservation Area in a South Eastern District with limited land, is of such materiality that it merits oral discussion. We also respectfully submit that the issues involved will benefit from the give-and-take of oral examination. Finally, we respectfully submit that the issues we are raising may be of wide importance to the Core Strategy of the District.□ |
| Strutt & Parker | Craig | Noel | 103 | 7 | 37 | C11 Existing an | Existing community facilities should be protected. The test for releasing any community land or building surplus to its original use should be tightened further, by reference to full market testing.□ |
| The Theatres Trust | Rose | Freeman | 132 | 0 | 37 | C11 Existing an | |
| DMH Stallard | C | Barker | 99 | 4 | 37 | C11 Existing an | There is conflict between Policy C11 and the visionary roles of Lancing College as identified within the Lancing College Landscape Assessment 2004 and the Lancing College Development Strategy 2004-2014. The wording of Policy C11 does not appear to fully acknowledge these documents. |
| South Downs Joint | N J | Belderson | 106 | 7 | 37 | C11 Existing an | The policy makes no reference to the importance of providing further opportunities for quiet, informal recreation in the AONB, or of links from the urban area to the countryside, or of protecting the amenity of existing recreational facilities in the countryside, particularly rights of way. |
| Alliance Environment | Christian | Holliday | 120 | 0 | 37 | C11 Existing an | |
| Shoreham Society | Bob | Cranmore | 133 | 0 | 38 | 12.10 | |
| Environment Agency | Emma | Winchester | 100 | 0 | 38 | C12 Infrastructu | |
| South Downs Joint | N J | Belderson | 106 | 0 | 38 | C12 Infrastructu | |
| The Theatres Trust | Rose | Freeman | 132 | 0 | 38 | C12 Infrastructu | |
| Alliance Environment | Christian | Holliday | 120 | 8 | 38 | C12 Infrastructu | This policy needs to take account of the fact that infrastructure provision does not, and should not, come solely from the developer. It is not always practical to hold local / county authorities to specific timetables for the provision of infrastructure |
| Alliance Environment | Christian | Holliday | 120 | 7 | 38 | C12 Infrastructu | This policy needs to take account of the fact that infrastructure provision does not, and should not, come solely from the developer. It is not always practical to hold local / county authorities to specific timetables for the provision of |

| <i>Organisation</i> | <i>Forename</i> | <i>Surname</i> | <i>ID S'nes</i> | <i>Pg Paragraph</i> | <i>Comments</i> |
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| | | | | | infrastructure. |
| Brighton & Hove City | Michael | Holford | 102 6 | 40 13.10 | The City Council is concerned that the measures to address the AQMA in Shoreham High Street could result in traffic accessing Shoreham Harbour being routed through Brighton & Hove instead. |
| South Downs Joint | N J | Belderson | 106 0 | 40 T1 Sustainable | |
| Savills | Simon | Fife | 124 6 | 40 T1 Sustainable | The provisions of Policy T1 Sustainable Transport are supported. Employment development and regeneration at Shoreham Airport could bring forward proposals to improve walking and cycling links between residential areas of Shoreham and the employment and leisure opportunities within the airport, by means of a financial contribution. In particular, we support paragraph 13.8 regarding the aims of the Service 700 Quality Bus Partnership, which has the potential to improve the quality of public transport services in the vicinity of the airport. Paragraph 13.3 should be amended by the addition of the following text regarding a as referred to in the Preferred Options consultation document and the Evidence Base document: 'The Plan includes a Parkway Station as a 'longer term' proposal but this would be subject to an Environmental Impact Assessment and financial feasibility study.' We support the need for a financial feasibility study and EIA for the Parkway Station proposal. Such studies must establish the need for such a facility and identify the transport benefits that it will secure. If the outcome of these studies is positive, Shoreham Airport is considered a suitable location for providing an interchange facility. |
| Savills | Simon | Fife | 124 4 | 40 T1 Sustainable | The provisions of Policy T1 Sustainable Transport are supported. Employment development and regeneration at Shoreham Airport could bring forward proposals to improve walking and cycling links between residential areas of Shoreham and the employment and leisure opportunities within the airport, by means of a financial contribution. In particular, we support paragraph 13.8 regarding the aims of the Service 700 Quality Bus Partnership, which has the potential to improve the quality of public transport services in the vicinity of the airport. Paragraph 13.3 should be amended by the addition of the following text regarding a as referred to in the Preferred Options consultation document and the Evidence Base document: 'The Plan includes a Parkway Station as a 'longer term' proposal but this would be subject to an Environmental Impact Assessment and financial feasibility study.' We support the need for a financial feasibility study and EIA for the Parkway Station proposal. Such studies must establish the need for such a facility and identify the transport benefits that it will secure. If the outcome of these studies is positive, Shoreham Airport is considered a suitable location for providing an interchange facility. |
| Alliance Environment | Christian | Holliday | 120 0 | 41 T2 Road Infrast | |
| Savills | Simon | Fife | 124 6 | 41 T2 Road Infrast | As drafted, Policy T2 lacks clarity. The Road Infrastructure Requirements policy should clearly identify existing deficiencies on both the trunk road and local highway networks. The strategy should then be used to pressure both the Highways Agency and Local Highway Authority to provide a comprehensive district-wide highway improvement strategy to address these existing deficiencies. The need for the use of a transport model to assess the transport impact of improvement measures is accepted. However, it will take some time to develop and validate a model of this size. The Core Strategy must therefore be flexible enough to allow planning applications in the initial years of the strategy to progress on an individual Transport Assessment basis without needing to wait for the completion of the District-wide assessment. The policy and supporting text should clarify that any contribution from developers towards road infrastructure will be sought under Policy T3 and will be reasonably related to the proposals in size and scale. The reference in the fourth bullet point to the potential for road infrastructure improvements to support regeneration, employment and business at locations including Shoreham Airport is supported. The Airport is a key part of the Council's regeneration strategy and sustainable transport infrastructure will play a role in the regeneration of the airport in the longer term. Policy T2 should include a reference to the provision of roadside services, with particular reference to services on strategic routes. The policy and supporting text should acknowledge that there is currently an under provision of roadside services along the A27 trunk road in this area. Individual proposals should be considered on their merits and with regard to the needs of the District and the trunk road network. In relation to |

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| | | | | | | | the supporting text for Policy T2 at paragraphs 13.11 to 13.14, the Evidence Base document notes that 'WSCC continues to pressure central government for improvements to the A27' and suggests that the Highways Agency is undertaking research into potential improvements on the A27. This information should be included in the core strategy, as per the previous Preferred Options consultation document. The Highways Agency should be strongly encouraged to address existing deficiencies on the trunk road network in a timescale compatible with the Core Strategy.□ |
| South Downs Joint | N J | Belderson | 106 | 0 | 41 | T2 Road Infrast | |
| Brighton & Hove City | Michael | Holford | 102 | 6 | 41 | T2 Road Infrast | It is unclear how the "...improvement measures including the redirection of traffic.....and where necessary new roads" would or could be achieved in relation to improving access to the Harbour, and how such measures may impact on neighbouring authorities. |
| Savills | Simon | Fife | 124 | 9 | 41 | T2 Road Infrast | As drafted, Policy T2 lacks clarity. The Road Infrastructure Requirements policy should clearly identify existing deficiencies on both the trunk road and local highway networks. The strategy should then be used to pressure both the Highways Agency and Local Highway Authority to provide a comprehensive district-wide highway improvement strategy to address these existing deficiencies.□ The need for the use of a transport model to assess the transport impact of improvement measures is accepted. However, it will take some time to develop and validate a model of this size. The Core Strategy must therefore be flexible enough to allow planning applications in the initial years of the strategy to progress on an individual Transport Assessment basis without needing to wait for the completion of the District-wide assessment. The policy and supporting text should clarify that any contribution from developers towards road infrastructure will be sought under Policy T3 and will be reasonably related to the proposals in size and scale. □ The reference in the fourth bullet point to the potential for road infrastructure improvements to support regeneration, employment and business at locations including Shoreham Airport is supported. The Airport is a key part of the Council's regeneration strategy and sustainable transport infrastructure will play a role in the regeneration of the airport in the longer term.□ Policy T2 should include a reference to the provision of roadside services, with particular reference to services on strategic routes. The policy and supporting text should acknowledge that there is currently an under provision of roadside services along the A27 trunk road in this area. Individual proposals should be considered on their merits and with regard to the needs of the District and the trunk road network.□ In relation to the supporting text for Policy T2 at paragraphs 13.11 to 13.14, the Evidence Base document notes that 'WSCC continues to pressure central government for improvements to the A27' and suggests that the Highways Agency is undertaking research into potential improvements on the A27. This information should be included in the core strategy, as per the previous Preferred Options consultation document. The Highways Agency should be strongly encouraged to address existing deficiencies on the trunk road network in a timescale compatible with the Core Strategy.□ |
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| Home Builders Fede | Pete | Errington | 121 | 7 | 42 | T3 New develop | In relation to the policy wording, the HBF consider that the highlighted statement below is inappropriate in the context of the policy. In order to minimise the transport impact of new developments: New developments will be required to contribute towards sustainable transport measures - such as public transport facilities, road improvements, walking/cycle paths and facilities and provision of travel plans; New developments will be expected to make efficient use of land, secure a mix of uses, particularly in town centers and to locate new development close to public transport. The intent to make efficient use of land and secure a mix of uses appears poorly explained in the context of the intention to locate development close to public transport. It is however the case that efficient use of land such as higher densities in settlement centers both urban and rural, as well as the provision of mixed-use development where appropriate can help facilitate the greater viability of public transport alternatives, due to higher threshold populations. Change sought The HBF consider that the sentence should be reworded to remove the ambiguity, and link the statement more clearly to the policy subject. May we suggest the following wording; "New development will be expected to be located in close proximity to public transport to provide an alternative mode(s) of travel to the car, either through the use of existing infrastructure or (improvements to). Alternatively commitment from the developer to deliver provision or their agreement to financial contributions towards new provision where it does not exist. The determination of an appropriate option should be sought on a site-by-site basis in negotiation with the council in accordance with circular 05/2005" |
| South Downs Joint | N J | Belderson | 106 | 0 | 42 | T3 New develop | |
| Savills | Simon | Fife | 124 | 0 | 42 | T3 New develop | |
| Savills | Simon | Fife | 124 | 0 | 43 | T4 Car Parking | |
| Dr Malcolm Bell Ltd | M | Bell | 86 | 4 | 44 | 13.25 | We call attention firstly, please, to the front-end-loaded submissions made in discussions and the overarching points submitted as part of this representation but not pointlessly repeated within each representation. [Note on 1st March : this was one way we tried not to repeat words within each representation but it looks like we may have to carry it into each.] It seems inconceivable that a major road being placed in such a location could simply be dealt with by a new Development Plan Document. A review of the Core Strategy must surely be the minimum. There must be no suggestion whatever of bypassing the new system for a specific scheme. That is the kind of thing that brings planning seriously into disrepute. We respectfully submit that the issues raised by us, and the need to provide a suitable visionary framework for derelict and under-used land within a Conservation Area in a South Eastern District with limited land, is of such materiality that it merits oral discussion. We also respectfully submit that the issues involved will benefit from the give-and-take of oral examination. Finally, we respectfully submit that the issues we are raising may be of wide importance to the Core Strategy of the District. |
| Strutt & Parker | Craig | Noel | 103 | 6 | 44 | 13.25 | The response to the Issues & Options consultation exercise recorded only 20% in favour of the "do nothing" option, yet there is no positive policy commitment to delivering a road which would have major regeneration benefits. In other words, although not stated, this would appear to be the preferred option. This is contrary to the approach |

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| Dr Malcolm Bell Ltd | M | Bell | 86 | 6 | 44 | 13.25 | <p>proposed in the Worthing Core Strategy. A specific EWAR policy would provide greater clarity.</p> <p>□</p> <p>We call attention firstly, please, to the front-end-loaded submissions made in discussions and the overarching points submitted as part of this representation but not pointlessly repeated within each representation. [Note on 1st March : this was one way we tried not to repeat words within each representation but it looks like we may have to carry it into each.]□ It seems inconceivable that a major road being placed in such a location could simply be dealt with by a new Development Plan Document. A review of the Core Strategy must surely be the minimum. □ There must be no suggestion whatever of bypassing the new system for a specific scheme. That is the kind of thing that brings planning seriously into disrepute.□ We respectfully submit that the issues raised by us, and the need to provide a suitable visionary framework for derelict and under-used land within a Conservation Area in a South Eastern District with limited land, is of such materiality that it merits oral discussion. We also respectfully submit that the issues involved will benefit from the give-and-take of oral examination. Finally, we respectfully submit that the issues we are raising may be of wide importance to the Core Strategy of the District.□</p> |
| Dr Malcolm Bell Ltd | M | Bell | 86 | 1 | 44 | 13.25 | <p>□</p> <p>We call attention firstly, please, to the front-end-loaded submissions made in discussions and the overarching points submitted as part of this representation but not pointlessly repeated within each representation. [Note on 1st March : this was one way we tried not to repeat words within each representation but it looks like we may have to carry it into each.]□ It seems inconceivable that a major road being placed in such a location could simply be dealt with by a new Development Plan Document. A review of the Core Strategy must surely be the minimum. □ There must be no suggestion whatever of bypassing the new system for a specific scheme. That is the kind of thing that brings planning seriously into disrepute.□ We respectfully submit that the issues raised by us, and the need to provide a suitable visionary framework for derelict and under-used land within a Conservation Area in a South Eastern District with limited land, is of such materiality that it merits oral discussion. We also respectfully submit that the issues involved will benefit from the give-and-take of oral examination. Finally, we respectfully submit that the issues we are raising may be of wide importance to the Core Strategy of the District.□</p> |
| Dr Malcolm Bell Ltd | M | Bell | 86 | 5 | 44 | 13.25 | <p>□</p> <p>We call attention firstly, please, to the front-end-loaded submissions made in discussions and the overarching points submitted as part of this representation but not pointlessly repeated within each representation. [Note on 1st March : this was one way we tried not to repeat words within each representation but it looks like we may have to carry it into each.]□ It seems inconceivable that a major road being placed in such a location could simply be dealt with by a new Development Plan Document. A review of the Core Strategy must surely be the minimum. □ There must be no suggestion whatever of bypassing the new system for a specific scheme. That is the kind of thing that brings planning seriously into disrepute.□ We respectfully submit that the issues raised by us, and the need to provide a suitable visionary framework for derelict and under-used land within a Conservation Area in a South Eastern District with limited land, is of such materiality that it merits oral discussion. We also respectfully submit that the issues involved will benefit from the give-and-take of oral examination. Finally, we respectfully submit that the issues we are raising may be of wide importance to the Core Strategy of the District.□</p> |
| Dr Malcolm Bell Ltd | M | Bell | 86 | 2 | 44 | 13.25 | <p>□</p> <p>We call attention firstly, please, to the front-end-loaded submissions made in discussions and the overarching points submitted as part of this representation but not pointlessly repeated within each representation. [Note on 1st March : this was one way we tried not to repeat words within each representation but it looks like we may have to carry it into each.]□ It seems inconceivable that a major road being placed in such a location could simply be dealt with by a new Development Plan Document. A review of the Core Strategy must surely be the minimum. □ There must be no suggestion whatever of bypassing the new system for a specific scheme. That is the kind of thing that brings planning seriously into disrepute.□ We respectfully submit that the issues raised by us, and the need to provide a</p> |

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| Dr Malcolm Bell Ltd | M | Bell | 86 | 7 | 44 | 13.25 | <p>suitable visionary framework for derelict and under-used land within a Conservation Area in a South Eastern District with limited land, is of such materiality that it merits oral discussion. We also respectfully submit that the issues involved will benefit from the give-and-take of oral examination. Finally, we respectfully submit that the issues we are raising may be of wide importance to the Core Strategy of the District.□</p> <p>□</p> <p>We call attention firstly, please, to the front-end-loaded submissions made in discussions and the overarching points submitted as part of this representation but not pointlessly repeated within each representation. [Note on 1st March : this was one way we tried not to repeat words within each representation but it looks like we may have to carry it into each.]□ It seems inconceivable that a major road being placed in such a location could simply be dealt with by a new Development Plan Document. A review of the Core Strategy must surely be the minimum. □ There must be no suggestion whatever of bypassing the new system for a specific scheme. That is the kind of thing that brings planning seriously into disrepute.□ We respectfully submit that the issues raised by us, and the need to provide a suitable visionary framework for derelict and under-used land within a Conservation Area in a South Eastern District with limited land, is of such materiality that it merits oral discussion. We also respectfully submit that the issues involved will benefit from the give-and-take of oral examination. Finally, we respectfully submit that the issues we are raising may be of wide importance to the Core Strategy of the District.□</p> |
| Dr Malcolm Bell Ltd | M | Bell | 86 | 3 | 44 | 13.25 | <p>□</p> <p>We call attention firstly, please, to the front-end-loaded submissions made in discussions and the overarching points submitted as part of this representation but not pointlessly repeated within each representation. [Note on 1st March : this was one way we tried not to repeat words within each representation but it looks like we may have to carry it into each.]□ It seems inconceivable that a major road being placed in such a location could simply be dealt with by a new Development Plan Document. A review of the Core Strategy must surely be the minimum. □ There must be no suggestion whatever of bypassing the new system for a specific scheme. That is the kind of thing that brings planning seriously into disrepute.□ We respectfully submit that the issues raised by us, and the need to provide a suitable visionary framework for derelict and under-used land within a Conservation Area in a South Eastern District with limited land, is of such materiality that it merits oral discussion. We also respectfully submit that the issues involved will benefit from the give-and-take of oral examination. Finally, we respectfully submit that the issues we are raising may be of wide importance to the Core Strategy of the District.□</p> |
| Dr Malcolm Bell Ltd | M | Bell | 86 | 9 | 44 | 13.25 | <p>□</p> <p>We call attention firstly, please, to the front-end-loaded submissions made in discussions and the overarching points submitted as part of this representation but not pointlessly repeated within each representation. [Note on 1st March : this was one way we tried not to repeat words within each representation but it looks like we may have to carry it into each.]□ It seems inconceivable that a major road being placed in such a location could simply be dealt with by a new Development Plan Document. A review of the Core Strategy must surely be the minimum. □ There must be no suggestion whatever of bypassing the new system for a specific scheme. That is the kind of thing that brings planning seriously into disrepute.□ We respectfully submit that the issues raised by us, and the need to provide a suitable visionary framework for derelict and under-used land within a Conservation Area in a South Eastern District with limited land, is of such materiality that it merits oral discussion. We also respectfully submit that the issues involved will benefit from the give-and-take of oral examination. Finally, we respectfully submit that the issues we are raising may be of wide importance to the Core Strategy of the District.□</p> |
| Dr Malcolm Bell Ltd | M | Bell | 86 | 8 | 44 | 13.25 | <p>□</p> <p>We call attention firstly, please, to the front-end-loaded submissions made in discussions and the overarching points submitted as part of this representation but not pointlessly repeated within each representation. [Note on 1st March : this was one way we tried not to repeat words within each representation but it looks like we may have to carry it into each.]□ It seems inconceivable that a major road being placed in such a location could simply be dealt with by a</p> |

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| Environment Agency | Emma | Winchester | 100 | 7 | 45 | 14.1 | In our previous comments on the Draft Core Strategy (letter dated 7 August 2006), we highlighted that large sections of the District are located within Source Protection Zones (SPZ's) and also overlie a major aquifer. It was therefore advised that the need to protect the quality of groundwater and drinking water from potential development and/or polluting activity be reflected throughout the strategy. □ We can not see evidence that these previous comments have been addressed throughout the Core Environmental Policies (ENV1 – ENV10) or supporting text within section 14.□ Throughout the document there is no mention made to the need to improve or protect surface water or groundwater quality. Given the importance of the water resource within the District and its potential vulnerability to future development or any polluting activity, we would expect a more precautionary approach to be taken. This recognition would ensure consistency with Planning Policy Statement 23: Planning and Pollution Control (PPS23) and our emerging National GP3 (Groundwater Protection: Policy and Practice), as well as the Water Framework Directive 2000/60/EC. □ We therefore suggest the following wording be inserted in a new supporting paragraph (to follow on from 14.6 on Biodiversity):□ A large area of the District lies within Groundwater Source Protection Zones (SPZ's). The zones provide an indication of the risk to groundwater supplies that may result from the accidental or uncontrolled release of pollutants into the environment. Once these resources are contaminated the effects can be harmful, persistent and extremely difficult to remediate. Pollution prevention is therefore actively promoted. □ □ Development has the potential to impact on the quality of groundwater and drinking water, particularly as the Chalk aquifer (the source of most of the public water supply) underlies a large area of the District. It is important that new development is built and carefully designed to protect groundwater quality and aquifers during construction and through the lifetime of the development. □ The requirements set out in NRM1 of the Draft Southeast Plan will be followed to ensure water quality in Adur is protected from any adverse effects of future development. □ □ |
| South Downs Joint | N J | Belderson | 106 | 7 | 45 | 14.4 | The Joint Committee objects to the removal of a policy relating to protecting and enhancing sites of nature conservation and biodiversity importance andresisting developments on such sites unless a number of criteria were met. Although the current text refers to PPS9, the Joint Committee considers it to be of significant importance to warrant retention as a policy. |
| South Downs Joint | N J | Belderson | 106 | 0 | 46 | ENV1 Open Sp | |
| Dr Malcolm Bell Ltd | M | Bell | 86 | 8 | 46 | ENV1 Open Sp | □ We call attention firstly, please, to the front-end-loaded submissions made in discussions and the overarching points submitted as part of this representation but not pointlessly repeated within each representation. [Note on 1st March : this was one way we tried not to repeat words within each representation but it looks like we may have to carry it into each.]□ For many years green corridors have been produced in a whole range of Plans. It has often been quite unclear as to how they are to be brought about and what they mean. With respect, that seems so here. Where precisely are these green corridors and who will bring them about?□ This objection probably cross-relates to that on ENV6 where there are also references to opportunities for informal uses and pedestrian and cycle links. □ We respectfully submit that the issues raised by us, and the need to provide a suitable visionary framework for derelict and under-used land within a Conservation Area in a South Eastern District with limited land, is of such materiality that it merits oral discussion. We also respectfully submit that the issues involved will benefit from the give-and-take of oral examination. Finally, we respectfully submit that the issues we are raising may be of wide importance to the |

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| | | | | | Core Strategy of the District.□ |
| Shoreham Society | Bob | Cranmore | 133 0 | 47 14.9 | |
| Shoreham Society | Bob | Cranmore | 133 0 | 47 ENV2 Sustaina | |
| South Downs Joint | N J | Belderson | 106 7 | 47 ENV2 Sustaina | Although the general principles of this policy are supported, and the text refers to the impact on landscape, the Joint Committee objects to the lack of reference to the AONB. It is suggested that a caveat be included, along the lines of "Permission will not be granted if the proposal would have an adverse effect on the natural beauty or amenity of the Sussex Downs AONB". |
| RPS Planning on be | Rebecca | Caines | 104 9 | 47 ENV2 Sustaina | FNH object to the requirement of 10% of energy generated on sites of 10 or more residential units should come from renewable energy sources. Whilst it is right and proper that energy and sustainable issues are considered, they should not stifle regeneration and development. In the case of many, it has yet to be demonstrated that end purchasers pay higher prices for them. Accordingly, such initiatives are often a cost to the developer. This is not yet reflected in land purchase prices and will take some time for these economics to filter through the process. Furthermore, specific requirements could make some schemes unviable and as a consequence important housing sites may not come forward to be develop. □ Moreover, where difficult sites are being regenerated and the costs are significant, other issues may be more important to reduce, for example contamination clean ups and affordable housing. The viability of delivering schemes must be a priority. FNH therefore object to any specific requirement of renewable energy provision unless the viability issue is made clear in the policy.□ |
| Home Builders Fede | Pete | Errington | 121 4 | 47 ENV2 Sustaina | The HBF object to the requirement for all residential developments (new build, conversion or renovation) of 10 or more units, to be expected to provide a minimum of 10% of their energy requirements from on-site renewable energy generation. □ Change sought:□We recommend that the requirement for 10% renewables be deleted, as it is in any case not yet an adopted policy within the RSS (reference to draft policy EN1 – South East Plan). In principle the HBF believe that the focus should be reducing carbon emissions from mew buildings and not pursuing the inclusion of a % of renewables. This is not a common sense approach because most renewable technologies have a limited lifespan in any case, especially as many are still developing technologies and are subject to continued innovation. The far more sensible approach is to aim for a % reduction in carbon emissions as this can be achieved in a number of ways including the upgrading of the buildings thermal efficiency which remains for the life of the building and not until the wind turbine breaks because it is either old or poorly maintained for example. The government have set their national timescale for the delivery of zero carbon housing by 2016 and this should be the mile post to which local government is also working. This timescale had been developed in consultation with the house building industry and renewable energy suppliers and gives sufficient time for relevant industries to 'gear up' to deliver the efficient housing which we all wish to see built. The implementation of the code is outlined in the consultation draft "Building a Greener Future: Towards Zero Carbon Development" (CLG). The HBF note in any case that 'PPS: Planning and Climate Change' states that;□ Planning authorities should not need, however, to devise their own standards for the environmental performance of individual buildings as these are set out nationally through the building regulations. Higher standards for new homes are set out in the Code for Sustainable Homes" ('PPS: Planning and Climate Change' paragraph 31).□ |
| South Downs Joint | N J | Belderson | 106 0 | 48 ENV3 Flood Ri | |
| Environment Agency | Emma | Winchester | 100 7 | 48 ENV3 Flood Ri | In general we support the inclusion and sentiment of this policy. Specifically, we are pleased to see that the Adur SFRA, River Adur Catchment Flood Management Plan and Selsey Bill to Beachy Head Shoreline Management Plan have been added to this policy. In our view the acknowledgement of these documents has improved the quality and relevance of this policy significantly and together with PPS25 should ensure that flood risk is addressed prior to any future development within Adur district. □ However, while we do not feel it is necessary to repeat policies either at |

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| | | | | | | | a national or regional level, we suggest that ENV4 would be strengthened by acknowledging that NRM3 of the Draft South East Plan will be followed. This minor amendment would require the following wording addition to the second paragraph of ENV3: □ "The principles set out in PPS25 and NRM3 of the Draft South East Plan will be followed in assessing development proposals". □ We also have concerns relating to the illustration titled 'ADUR: Areas at risk of flooding'. This is not referred to within either the background text (paragraphs 14.10 – 14.12) or in ENV3 itself and therefore currently adds little value to this section. □ Furthermore we note that this illustration should not be depicted as a definitive representation of all flood risk issues in Adur. This map is based largely on Environment Agency Flood Zones and these are focused on Main River flooding and tidal flood risk associated with defences maintained by the Environment Agency. It will be up to the SFRA to provide further details on areas at risk of flooding in Adur, inclusive of all forms of flooding as required by Annex C of PPS25. □ We therefore suggest that this illustration is removed from the Core Strategy and that reference is made to the specific and more exhaustive maps included in the SFRA. Alternatively, if it is felt necessary to leave this illustration in the document, we recommend the following changes: □ (1) □The illustration should be given a reference (i.e. Figure 1) and referred to □within the text, or background text of ENV 3 accordingly; □(2) □It should be made clear that the illustration addresses only tidal and fluvial □flooding and there are additional sources of flooding that also need to be □considered (for example surface water and groundwater flooding). □ As a minor comment, we also note that following the publication of PPS25 in December 2006 all references made to 'PPG25' or the 'draft PPS25' throughout the Core Strategy should be updated. □ |
| Shoreham Society | Bob | Cranmore | 133 | 0 | 49 | 14.13 | |
| Strutt & Parker | Craig | Noel | 103 | 7 | 49 | 14.13 | There is no clear evidence to support the reasonableness of a minimum "Very Good" standard for all development. |
| Strutt & Parker | Craig | Noel | 103 | 9 | 49 | 14.13 | The BREEAM standard has recently been revised, making a "Very Good" standard quite onerous, particularly for some types of buildings. The policy should be revised to refer to achieving at least a pass and should set a target to achieve a "good" standard wherever it can be reasonably achieved having regard to the type of building and the nature of energy and resource consumption likely within the structure. |
| Shoreham Society | Bob | Cranmore | 133 | 0 | 49 | 14.14 | |
| Strutt & Parker | Craig | Noel | 103 | 6 | 49 | 14.16 | It should be recognised that new sites on the edge of the built-up area may also need to be identified to help meet the needs of the sub-region as identified in the Draft South East Plan, not just the needs of the District. This would then accord with Preferred Policy R1 which refers to the promotion of regeneration of "the wider coastal sub region". □ |
| South Downs Joint | N J | Belderson | 106 | 0 | 49 | ENV4 Resourc | |
| Southern Water | Chris | Kneale | 122 | 4 | 49 | ENV4 Resourc | If you would like a change to this document, what would that change be? □ ENV4 Resource Efficient Buildings □SUPPORT WITH MODIFICATION □ Southern Water supports the promotion of water efficiency in new development through the adoption of BREEAM standards. However, the promotion of sustainable infrastructure is also essential and we believe the policy should incorporate this. □ □NECESSARY CHANGES □ Add the following text (underlined) to policy ENV4 □ ENV4 Resource efficient buildings □ It is proposed to promote efficient use of water, energy, and materials and infrastructure as well as the minimisation of waste in new developments. Measures to achieve the efficient environmental performance of new buildings will be required. Therefore all new development should at least meet the BREEAM standard 'Very Good'. □ □REASON FOR CHANGE □ Efficient use of infrastructure □ Sustainable infrastructure and its efficient use are important components of sustainable development. Southern Water has identified three ways in which the planning authority can assist in achieving this objective: □ Firstly, a co-ordinated whole-site approach to large and/or mixed ownership sites will promote sustainable sewerage and water supply networks, and prevent the proliferation of smaller, less efficient networks. |

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| | | | | | | | Secondly, separate drainage of surface water provides more efficient use of the foul sewer, and reduces the risk of flooding. Finally, construction of on-site and off-site sewers to standards for adoption will ensure that they function effectively and prevent leakage of sewage into the environment. <input type="checkbox"/> <input type="checkbox"/> WHY THE CHANGE WILL MAKE THE CORE STRATEGY SOUND <input type="checkbox"/> Amendments to policy ENV4 Resource efficient buildings will promote provision of efficient and sustainable infrastructure for development. This will ensure that the Local Development Framework is consistent with paragraph 36 of PPS1, which states that planning authorities should include policies that ensure sustainable, durable and adaptable developments that make efficient and prudent use of resources. <input type="checkbox"/> If you would like a change to this document, what would that change be? <input type="checkbox"/> <input type="checkbox"/> |
| Home Builders Fede | Pete | Errington | 121 | 4 | 49 | ENV4 Resourc | The HBF object to the requirement of local planning policy to stipulate building performance standards. In any case the BREAM EcoHomes standard is now obsolete in light of the publication of the Code for Sustainable Homes. The HBF believe fundamentally that there should be no potential within the remit of local planning authorities to influence the performance standards of residential development. This issue falls within the remit of building regulations, the code for sustainable homes and the draft timescale for its implementation. Any local policy aspiration should conform to government policy objectives. <input type="checkbox"/> Change sought: <input type="checkbox"/> A locally based policy that enforces building performance measures should not be necessary and as such should be deleted from the core strategy. This is in line with out response to ENV2 above. <input type="checkbox"/> |
| Strutt & Parker | Craig | Noel | 103 | 9 | 49 | ENV4 Resourc | The BREEAM standard has recently been revised, making a "Very Good" standard quite onerous, particularly for some types of buildings. The policy should be revised to refer to achieving at least a pass and should set a target to achieve a "good" standard wherever it can be reasonably achieved having regard to the type of building and the nature of energy and resource consumption likely within the structure. |
| Shoreham Society | Bob | Cranmore | 133 | 0 | 49 | ENV4 Resourc | |
| Strutt & Parker | Craig | Noel | 103 | 7 | 49 | ENV4 Resourc | There is no evidence to support the reasonableness of a "Very Good" standard as a minimum in all development. |
| South Downs Joint | N J | Belderson | 106 | 0 | 49 | ENV5 Landsca | |
| South Downs Joint | N J | Belderson | 106 | 0 | 50 | 14.17 | |
| South Downs Joint | N J | Belderson | 106 | 0 | 50 | 14.18 | |
| Dr Malcolm Bell Ltd | M | Bell | 86 | 5 | 50 | ENV6 Gaps bet | <input type="checkbox"/> In our representations on the Draft Core Strategy Preferred Options Stage in regard to the comparable part of the document, we made what we thought were important and useful points. These have not been wholly followed but we feel they are important to the soundness of the document. <input type="checkbox"/> We call attention firstly, please, to the front-end-loaded submissions made in discussions and the overarching points submitted as part of this representation but not pointlessly repeated within each representation. [Note on 1st March : this was one way we tried not to repeat words within each representation but it looks like we may have to carry it into each.] <input type="checkbox"/> At the Preferred Options Stage we said the following about the then Policy ENV6 : <input type="checkbox"/> It is with all respect that we note that we have been trying for quite some time now to lay before you what we believe is the proper policy and legal framework to approach a site in a conservation area giving weight to enhancement. We feel rebuffed. Thus, it is interesting that the same issue of landscape and townscape character was omitted from the draft core strategy issues. We support vehemently the inclusion of such a policy but object on a number of grounds. <input type="checkbox"/> 1. The linking of landscape character and townscape character in this way is not helpful. Landscape character assessment has had a lot of words dedicated to it but also has some critics. There are some excellent examples of landscape character assessment being used to promote positive planning good (for example in the National Forest or some of the Community Forests). There are other examples where it seems to be a stultifying force (what is the point of simply analysing the character of a piece |

of countryside to say that most of its hedgerows have been removed and it has become rather dull, unless it is followed by action)? Townscape character on the other hand is linked to a statutory designation : conservation areas. There is a statutory framework for enhancement. There is longstanding advice on producing conservation area plans for improvement (sadly not always followed by other authorities but you have them). We are unconvinced of the merits of linking them. □ 2. In particular there is a statutory requirement in conservation areas to consider enhancement (and case law on its definition). The "where possible" may well pertain to a broad brush assessment of wide countryside but not to the fine grain of a conservation area. □ 3. We are also concerned that there may be conflict with other policies when you have anything which opens "any development or activities ...". An area may well want to have wind turbines on high places but not have any pre-existing windmills and therefore there could be conflict which the Plan should help to resolve. □ Relatedly we said the following about ENV7 : □ Support the principle that there needs to be a full review of the concept, objectives and boundaries. □ Object : □ 1. On p.36 it is suggested that the exact boundaries will be reviewed "subject to ...". This should be "as part of ...". □ 2. On p.35 we are told the sustainability appraisal shows that Option 1 would have no harmful effects on the environment. This is factually untrue. We are speaking for a long term derelict site in a conservation area in which – it seems from the exchanges we have managed with the Authority – that the strategic gap concept (although in fact inappropriate to the walled site) is part of what is preventing its beneficial use. Unless what is being said on p.35 is that the Authority recognises that the strategic gap cannot in fact include a walled area which does not contribute to it as an open gap then this factual error must be revised. □ 3. In ENV7 the second section should say "it is proposed that the Core Strategy should protect and enhance that land between Sompting and Worthing which genuinely contributes in a significant material way to the retention of an open area ...". □ 4. The first bullet point should open with the word "realistically". □ 5. The second bullet point should say "protect and enhance the Sompting Conservation Area recognising that there may be areas where built form will better enhance the conservation area than what exists at present". □ 6. With respect, we do not understand the third bullet point and respectfully suggest it be re-written to spell out what it is actually intending. □ Please cross-refer to the points made elsewhere on ENV1 and other policies/vision. □ Let us start by offering a strong welcome to the fact that a clear reason is given in ENV6 as to why the gaps between settlements are to be retained. Land which does not help provide an open area nor contribute to retaining a separate identity and character should therefore not be in the designation of the gap between the settlement. □ In particular, land to the west of Church Lane, Sompting cannot fit that definition and should not be included. The key diagram should make that clear. □ We also welcome the fact that the size of the gaps should be no greater than is necessary. □ We would welcome a discussion of greater depth with the Authority about how new positive land uses on the edge of such gaps can help contribute to pedestrian cycle links etc. □ An enormous welcome is given for the bullet point which says "the Sompting Conservation Area will be protected and enhanced" but it needs to be clear that not all the Sompting Conservation Area is within the gap. □ We respectfully submit that the issues raised by us, and the need to provide a suitable visionary framework for derelict and under-used land within a Conservation Area in a South Eastern District with limited land, is of such materiality that it merits oral discussion. We also respectfully submit that the issues involved will benefit from the give-and-take of oral examination. Finally, we respectfully submit that the issues we are raising may be of wide importance to the Core Strategy of the District. □

Dr Malcolm Bell Ltd M Bell 86 6 50 ENV6 Gaps bet □

In our representations on the Draft Core Strategy Preferred Options Stage in regard to the comparable part of the document, we made what we thought were important and useful points. These have not been wholly followed but we feel they are important to the soundness of the document. □ We call attention firstly, please, to the front-end-loaded submissions made in discussions and the overarching points submitted as part of this representation but not pointlessly repeated within each representation. [Note on 1st March : this was one way we tried not to repeat words within each representation but it looks like we may have to carry it into each.] □ At the Preferred Options Stage we said the following about the then Policy ENV6 : □ It is with all respect that we note that we have been trying for quite some time now to lay before you what we believe is the proper policy and legal framework to approach a site in a conservation area giving weight to enhancement. We feel rebuffed. Thus, it is interesting that the same issue of

landscape and townscape character was omitted from the draft core strategy issues. We support vehemently the inclusion of such a policy but object on a number of grounds. □ 1. The linking of landscape character and townscape character in this way is not helpful. Landscape character assessment has had a lot of words dedicated to it but also has some critics. There are some excellent examples of landscape character assessment being used to promote positive planning good (for example in the National Forest or some of the Community Forests). There are other examples where it seems to be a stultifying force (what is the point of simply analysing the character of a piece of countryside to say that most of its hedgerows have been removed and it has become rather dull, unless it is followed by action)? Townscape character on the other hand is linked to a statutory designation : conservation areas. There is a statutory framework for enhancement. There is longstanding advice on producing conservation area plans for improvement (sadly not always followed by other authorities but you have them). We are unconvinced of the merits of linking them. □ 2. In particular there is a statutory requirement in conservation areas to consider enhancement (and case law on its definition). The "where possible" may well pertain to a broad brush assessment of wide countryside but not to the fine grain of a conservation area. □ 3. We are also concerned that there may be conflict with other policies when you have anything which opens "any development or activities ...". An area may well want to have wind turbines on high places but not have any pre-existing windmills and therefore there could be conflict which the Plan should help to resolve. □ Relatedly we said the following about ENV7 : □ Support the principle that there needs to be a full review of the concept, objectives and boundaries. □ Object : □ 1. On p.36 it is suggested that the exact boundaries will be reviewed "subject to ...". This should be "as part of ...". □ 2. On p.35 we are told the sustainability appraisal shows that Option 1 would have no harmful effects on the environment. This is factually untrue. We are speaking for a long term derelict site in a conservation area in which – it seems from the exchanges we have managed with the Authority – that the strategic gap concept (although in fact inappropriate to the walled site) is part of what is preventing its beneficial use. Unless what is being said on p.35 is that the Authority recognises that the strategic gap cannot in fact include a walled area which does not contribute to it as an open gap then this factual error must be revised. □ 3. In ENV7 the second section should say "it is proposed that the Core Strategy should protect and enhance that land between Sompting and Worthing which genuinely contributes in a significant material way to the retention of an open area ...". □ 4. The first bullet point should open with the word "realistically". □ 5. The second bullet point should say "protect and enhance the Sompting Conservation Area recognising that there may be areas where built form will better enhance the conservation area than what exists at present". □ 6. With respect, we do not understand the third bullet point and respectfully suggest it be re-written to spell out what it is actually intending. □ Please cross-refer to the points made elsewhere on ENV1 and other policies/vision. □ Let us start by offering a strong welcome to the fact that a clear reason is given in ENV6 as to why the gaps between settlements are to be retained. Land which does not help provide an open area nor contribute to retaining a separate identity and character should therefore not be in the designation of the gap between the settlement. □ In particular, land to the west of Church Lane, Sompting cannot fit that definition and should not be included. The key diagram should make that clear. □ We also welcome the fact that the size of the gaps should be no greater than is necessary. □ We would welcome a discussion of greater depth with the Authority about how new positive land uses on the edge of such gaps can help contribute to pedestrian cycle links etc. □ An enormous welcome is given for the bullet point which says "the Sompting Conservation Area will be protected and enhanced" but it needs to be clear that not all the Sompting Conservation Area is within the gap. □ We respectfully submit that the issues raised by us, and the need to provide a suitable visionary framework for derelict and under-used land within a Conservation Area in a South Eastern District with limited land, is of such materiality that it merits oral discussion. We also respectfully submit that the issues involved will benefit from the give-and-take of oral examination. Finally, we respectfully submit that the issues we are raising may be of wide importance to the Core Strategy of the District. □

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| Strutt & Parker | Craig | Noel | 103 | 6 | 50 | ENV6 Gaps bet | <p>Policy EN6 is not consistent with Worthing Borough Council Preferred Option EN2 (although EN6 correctly refers to "gaps between settlements" rather than "strategic gaps"). The last paragraph of EN2 includes a clear statement of the need to develop proposals to help deliver regeneration objectives. This should be reflected in ENV6, which should also be clearer about the development potential referred to in the preamble. The policy should recognise the potential for new development. The policy for "Land Between Sompting & Worthing" should also recognise that the transport improvements could include measures to resolve congestion on the A259 and A27 Trunk Route. □</p> |
| Broadlands Chartere | Paul | Carter | 94 | 7 | 50 | ENV6 Gaps bet | <p>The Gaps should be identified in accordance with the principle explained in the final paragraph, a principle that for the avoidance of doubt should be expressed at the beginning of the policy. The policy should be amended to reflect the fact that Greenfield development may be permitted to provide homes and employment opportunities pursuant to policies R1, E2 (as proposed to be amended through representations lodged on behalf of Landstone Limited to include a role for Greenfield sites where justified through the Sequential Test) and H1, in accordance with the spatial strategy of the Plan.</p> |
| Savills | Simon | Fife | 124 | 4 | 50 | ENV6 Gaps bet | <p>Policy ENV6 Gaps between settlements □ We object to Policy ENV6 for the following reasons: □ • □ PPS7 advises Local Authorities to replace local landscape designations with a criteria-based approach to protecting and managing land use change in land around urban areas. It goes onto recommend the use of the landscape character assessment approach, which provides a framework within which any development proposals can be assessed. □ • □ The recommendation of the Panel on the West Sussex Structure Plan that Strategic Gaps in West Sussex should be replaced by a policy designed to avoid the coalescence of settlements in general without singling out specific areas for protection. This would provide a basis for assessing land use change in the countryside between a settlement and its use / protection. □ • □ The Green Belt is under review in many areas around England in order to address the need to accommodate development in sustainable locations that were previously constrained by Green Belt policy applied many years ago when the policy priorities were very different. It follows that Strategic Gaps represent a similarly outmoded policy approach to controlling development around settlements and should therefore be replaced by a more broad-based policy approach as sought in PPS7. □ • □ RPG9 (para 6.7) requires Local Planning Authorities to rigorously assess the function and justification for Strategic Gaps and similar local designations. The guidance advocates use of the countryside character analysis approach devised by the Countryside Agency as a basis for future policy, which would favour a criteria-based approach over area-specific local designations. □ • □ Policy SCT4 of the Draft South East Plan allows for some infringement of environmental constraints if there is a powerful case for regeneration, there are no alternatives and the harmful effects can be mitigated □ • □ The 'Gaps between settlements' designation places an undue restriction on land within Shoreham Airport which represents a sustainable location for new employment related development under Policy R4 of the Core Strategy. There is potential to develop new employment areas within the airport boundary outside the existing</p> |

building zone whilst maintaining an open gap between Lancing and Shoreham. Policy ENV5 already provides a general policy framework that seeks to protect and enhance the settlement pattern and townscape character of the area in line with the landscape character approach described in PPS7. It is therefore considered that there is no need for policy ENV6 and the policy should be deleted from the Core Strategy. However, if additional policy protection is needed, then we suggest that the following alternative policies are considered in order to ensure that additional employment development at the Airport can take place: Either replace the 'Gaps between settlements' designation on the Key Diagram with a symbol that does not identify boundaries for the policy, and allows flexibility for development at the airport, or redefine the extent of the 'Gaps between settlements' designation to exclude Shoreham Airport. In both cases the changes should be accompanied by the following revisions to Policy ENV6: Land Between Shoreham and Lancing: An open area of The land between Shoreham and Lancing will be protected as an open area in order to retain the separate identity and character of these settlements. Within this context: Opportunities for recreation and community uses including enhanced pedestrian and cycle links and better access for those with mobility difficulties will be promoted; The airport will be a key location for regeneration and new employment; Transport improvements in the area to address congestion and access problems and to secure regeneration benefits will be supported. If policy ENV6 is retained without the above changes, it is essential that the airport is recognised as a key location for regeneration and new employment. In this respect, the second bullet point in Policy ENV6 is fully supported. The last paragraph of Policy ENV6 states that "the size of these gaps will be no greater than is necessary to maintain the identity of the settlements and to prevent their coalescence". If this approach is supported, it is important that the Key Diagram is amended to reflect this, as set out in our representations in response to the Key Diagram. Evidence Base The Core Strategy Evidence Base document should be updated with the following information in respect to Policy ENV6: National Policy The Draft Evidence Base should refer to Government guidance in paragraphs 24 and 25 of PPS7. The key points of that guidance are that: Outside nationally designated areas, criteria-based policies should provide sufficient protection, without the need for rigid local designations that may unduly restrict acceptable, sustainable development. Local landscape designations should only be maintained where it can clearly be shown that criteria-based planning policies cannot provide the necessary protection. When reviewing local area-wide development plans and LDDs, planning authorities should rigorously consider the justification for retaining local landscape designations. They should ensure that such designations are based on a formal and robust assessment of the qualities of the landscape concerned. West Sussex Structure Plan The Panel report into the West Sussex Structure Plan Examination in Public recommended that the strategic gap policy should be omitted and that the future use of the land should be addressed on the normal principles of sustainability and countryside policies. However, West Sussex County Council adopted Policy CH3 contrary to this recommendation. The adopted West Sussex Structure Plan was prepared prior to Government guidance in PPS7, which clearly recommends a flexible criteria-based approach in place of the identification of gaps. The evidence base should recognise that Government guidance in PPS7 overrides Structure Plan Policy CH3.

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out specific areas for protection. This would provide a basis for assessing land use change in the countryside between a settlement and its use / protection. □ • □ The Green Belt is under review in many areas around England in order to address the need to accommodate development in sustainable locations that were previously constrained by Green Belt policy applied many years ago when the policy priorities were very different. It follows that Strategic Gaps represent a similarly outmoded policy approach to controlling development around settlements and should therefore be replaced by a more broad-based policy approach as sought in PPS7. □ • □ RPG9 (para 6.7) requires Local Planning Authorities to rigorously assess the function and justification for Strategic Gaps and similar local designations. The guidance advocates use of the countryside character analysis approach devised by the Countryside Agency as a basis for future policy, which would favour a criteria-based approach over area-specific local designations. □ • □ Policy SCT4 of the Draft South East Plan allows for some infringement of environmental constraints if there is a powerful case for regeneration, there are no alternatives and the harmful effects can be mitigated □ • □ The 'Gaps between settlements' designation places an undue restriction on land within Shoreham Airport which represents a sustainable location for new employment related development under Policy R4 of the Core Strategy. There is potential to develop new employment areas within the airport boundary outside the existing building zone whilst maintaining an open gap between Lancing and Shoreham. □ Policy ENV5 already provides a general policy framework that seeks to protect and enhance the settlement pattern and townscape character of the area in line with the landscape character approach described in PPS7. It is therefore considered that there is no need for policy ENV6 and the policy should be deleted from the Core Strategy. □ However, if additional policy protection is needed, then we suggest that the following alternative policies are considered in order to ensure that additional employment development at the Airport can take place: □ Either replace the 'Gaps between settlements' designation on the Key Diagram with a symbol that does not identify boundaries for the policy, and allows flexibility for development at the airport, or redefine the extent of the 'Gaps between settlements' designation to exclude Shoreham Airport. In both cases the changes should be accompanied by the following revisions to Policy ENV6: □ Land Between Shoreham and Lancing: □ An open area of The land between Shoreham and Lancing will be protected as an open area in order to retain the separate identity and character of these settlements. Within this context: □ Opportunities for recreation and community uses including enhanced pedestrian and cycle links and better access for those with mobility difficulties will be promoted; □ The airport will be a key location for regeneration and new employment □ Transport improvements in the area to address congestion and access problems and to secure regeneration benefits will be supported. □ If policy ENV6 is retained without the above changes, it is essential that the airport is recognised as a key location for regeneration and new employment. In this respect, the second bullet point in Policy ENV6 is fully supported. □ The last paragraph of Policy ENV6 states that "the size of these gaps will be no greater than is necessary to maintain the identity of the settlements and to prevent their coalescence". If this approach is supported, it is important that the Key Diagram is amended to reflect this, as set out in our representations in response to the Key Diagram. □ Evidence Base □ The Core Strategy Evidence Base document should be updated with the following information in respect to Policy ENV6: □ National Policy □ The Draft Evidence Base should refer to Government guidance in paragraphs 24 and 25 of PPS7. The key points of that guidance are that: □ • □ Outside nationally designated areas, criteria-based policies should provide sufficient protection, without the need for rigid local designations that may unduly restrict acceptable, sustainable development. □ • □ Local landscape designations should only be maintained where it can clearly be shown that criteria-based planning policies cannot provide the necessary protection. □ • □ When reviewing local area-wide development plans and LDDs, planning authorities should rigorously consider the justification for retaining local landscape designations. They should ensure that such designations are based on a formal and robust assessment of the qualities of the landscape concerned. □ West Sussex Structure Plan □ The Panel report into the West Sussex Structure Plan Examination in Public recommended that the strategic gap policy should be omitted and that the future use of the land should be addressed on the normal principles of sustainability and countryside policies. However, West Sussex County Council adopted Policy CH3 contrary to this recommendation. □ The adopted West Sussex Structure Plan was prepared prior to Government guidance in PPS7, which clearly recommends a flexible criteria-based approach in place of the identification of gaps. The evidence base should recognise that Government

| <i>Organisation</i> | <i>Forename</i> | <i>Surname</i> | <i>ID S'nes</i> | <i>Pg Paragraph</i> | <i>Comments</i> |
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| | | | | | guidance in PPS7 overrides Structure Plan Policy CH3.□ |
| West Sussex Count | Tom | Tanner | 130 4 | 50 ENV6 Gaps bet | There should be some reference to the relationship to Worthing's LDF and the wider sub-regional policy framework. There needs to be more explicit statements about potential joint working with Worthing and other public agencies and the private sector to assess the deliverability of possible development proposals with EWAR as part of this. Page 4 and 8 of the Preferred Option WSCC response makes reference to EWAR and the need for a clear and more explicit policy. |
| South Downs Joint | N J | Belderson | 106 0 | 50 ENV6 Gaps bet | |
| DMH Stallard | C | Barker | 99 4 | 51 ENV7 The Sout | There could be conflict between the visionary roles of Lancing College and Policy ENV7. The Policy fails to fully acknowledge the Lancing College Landscape Assessment 2004 or the Lancing College Development Strategy 2004-2014. A defined development envelope and agreed development strategy should make clear the constraints or options available to Lancing College. |
| South Downs Joint | N J | Belderson | 106 0 | 51 ENV7 The Sout | |
| Southern Water | Chris | Kneale | 122 4 | 51 ENV7 The Sout | If you would like a change to this document, what would that change be?□ ENV7 The South Downs□OBJECTION□ NECESSARY CHANGES□ Add bullet points to policy ENV7 (text underlined)□ Development on brownfield sites within the AONB (including Shoreham Cement Works and Lancing College) will only be permitted if it:□•□Facilitates the economic and social well-being of the districts of Adur and Horsham, and the wider area;□•□Is suitably designed;□•□Respects the character, natural beauty and biodiversity of the AONB;□•□Is in the public interest or raises issues of national significance, and no reasonable alternative site is available.□ Development on greenfield sites within the AONB will only be permitted if it:□•□Facilitates the economic and social well-being of the local rural community;□•□Is of an appropriate scale;□•□Is suitably located and easily accessible;□•□Is suitably designed;□•□Preserves and enhances the character, natural beauty and biodiversity of the AONB;□•□Is in the public interest or raises issues of national significance, and no reasonable alternative site is available.□ □WHY THE CHANGE WILL MAKE THE CORE STRATEGY SOUND□ Southern Water recognises the need to protect AONBs from inappropriate development. However, the provision of addition water and sewerage infrastructure may be required within the AONB. Development in such areas should be permitted in exceptional circumstances if the development is in the public interest or raises issues of national significance. This is stated in paragraph 22 of PPS7. □ We therefore propose the above amendment to accurately reflect Government guidance and to ensure that the Core Strategy meets the tests of conformity.□ □ |
| South Downs Joint | N J | Belderson | 106 0 | 52 ENV8 The Rive | |
| Dr Malcolm Bell Ltd | M | Bell | 86 9 | 53 ENV10 The Bui | □ We call attention firstly, please, to the front-end-loaded submissions made in discussions and the overarching points submitted as part of this representation but not pointlessly repeated within each representation. [Note on 1st March : this was one way we tried not to repeat words within each representation but it looks like we may have to carry it into each.]□ All our team were delighted to see the significant re-visit to the whole Policy area concerning the built and historic environment. □ Six weeks is not a long time for busy people to assimilate all that might be involved. □ □ There is much which is excellent and locally specific herein.□ We refer to test of soundness 5 however, because the Community Strategy wants “to maintain and protect the best possible environment for future generations”. □ □ That is an excellent and big visionary objective. It wants the best possible, not any mealy-mouthed compromises.□ Our concern is not that ENV10 in itself would constrain movement towards the best possible enhancement, but that the whole document may be unsound because of the apparent limitations and constraints |

from other policies which may be quoted to conflict with objectives in ENV10. □ We are quite conscious this is not a Site Allocations Document. We are thinking at a wider level; so let us suppose that the best enhancement for a derelict nursery, surrounded by such important walls in the Sompting Conservation Area was re-development for housing. Let us suppose that housing would contribute to affordable housing needs and that any inchoateness within the policy between what is said on housing densities in different parties of the Core Strategy did not in fact become an issue. □ We can presume these matters reasonably because certainly no-one has yet produced any better suggestion, nor even argument against, the designs put forward for the site in February 2005. Two years have passed with no environmental improvement, which is no praise for the present planning system but the Authority have been moving rapidly on these new Documents. So, how does the Core Strategy guide us? □ It would be truly unsound would be if the chance to enhance the area and produce the best possible environment were stopped or held up because others parts of the Core Strategy suggested : □ (a) nothing can be done until the Site Allocations Document comes forward □ (b) whilst there is no other viable use for the site housing use conflicts with the housing numbers and allocations aspects of the Strategy □ (c) any other part of the Core Strategy and approach prevents a good solution coming forward in the shortest possible time. □ Almost worse than there being an absolute preclusion would be a position where the document gave such apparently contradictory guidance that one had to waste the time and resources of a Section 78 appeal to test what it all meant and where the weight should fall. □ To that extent we object in the third paragraph of ENV10 to the fact that the only acknowledged way of identifying enhancement is via a Character Appraisal or Management Plan. They can be extremely useful. They can also take a good length of time and should not be substitutes for action. □ We respectfully suggest the third paragraph should keep its first sentence but then continue “Schemes to enhance Conservation Areas will be welcomed at the earliest possible date. In addition to enhancement brought about by the direct action of land owners and others within Conservation Areas other enhancement measures will be identified ...”. □ We respectfully submit that the issues raised by us, and the need to provide a suitable visionary framework for derelict and under-used land within a Conservation Area in a South Eastern District with limited land, is of such materiality that it merits oral discussion. We also respectfully submit that the issues involved will benefit from the give-and-take of oral examination. Finally, we respectfully submit that the issues we are raising may be of wide importance to the Core Strategy of the District. □

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South Downs Joint N J Belderson 106 0 53 ENV10 The Bui

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BBP Regeneration Rob Bennett 115 9 55 Annex 1 Monito See comments relative to Test 7 above.

BBP Regeneration Rob Bennett 115 7 55 Annex 1 Monito □

The text regarding Targets for Policy H1 listed in Annex 1 (page 65) is unsound for the same reasons noted in SEEDA’s representation on Policy H1. The inclusion of a figure of 500 homes at Shoreham Harbour is premature in light of an ongoing review of the 1999 Shoreham Maritime Vision, and an emerging Delivery Plan for Shoreham Harbour and subsequent Joint Area Action Plan, where a revised quantum of housing will be put forward.

Furthermore, the level of housing allocations for Adur District are yet to be finalised in the absence of an adopted South East Plan. SEEDA therefore proposes the following change to Annex 1 (page 65): "At least 2,600 new homes by 2026 at 130 dwellings per year. A significant number of new homes at Shoreham Harbour. At least 60% of new homes to 2026 will be on previously developed land."