

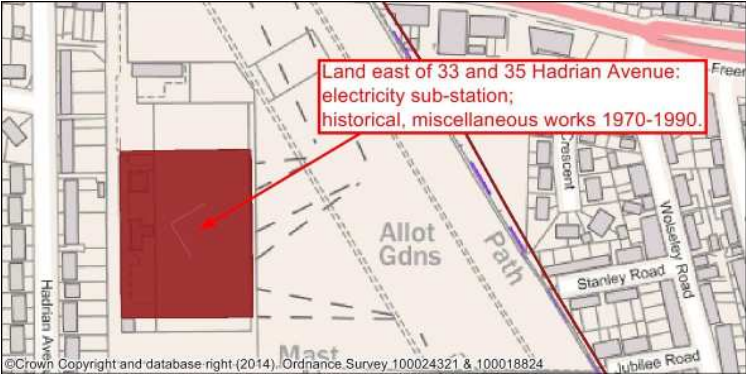
## Appendix 1: Summary of Representations Received and Council's Response

	Contact Details	Representation	Adur Response
1.	Resident	<p><i>Site 2 - concerns over proposed housing overlooking property in Manor Hall Road where currently we have no such issues. Expresses concern that this might have an effect on the value of property depending on what kind of housing is intended. Other main concern is reduced privacy and security to the rear of property. Concerns for privacy and security would also be heightened with an accessible open space, particularly where groups could gather in the evenings and where many areas locally have had issue with travellers setting up unauthorised camps.</i></p> <p><i>I would be interested to hear what plans you would have in place to ensure the above does not cause issue.</i></p>	<p><i>This site is not currently considered suitable for housing development, given the sub -standard access, location of the substation and underground cables. However, the site will be monitored through the Strategic Housing Land Availability Assessment and will be reassessed in the event that the constraints can be overcome.</i></p>
2.	Resident	<p><i>Site 2 – strongly object to use for housing. The problems as described - access to the site, electricity pylons, underground cables and the probably compulsory purchase of a property in Manor Hall Road etc. says it all, that this site is not suitable for Housing.</i></p> <p><i>Seeks confirmation from Paragraph 2.3:2.3.1, where the single track road, which gives limited access to the site, is located in Manor Hall Road.</i></p>	<p><i>This site is not currently considered suitable for housing development, given the sub -standard access, location of the substation and underground cables. However, the site will be monitored through the Strategic Housing Land Availability Assessment and will be reassessed in the event that the constraints can be overcome.</i></p> <p><i>Para 2.3 refers to the access from the Old Shoreham Road (A270) to the former Eastbrook Allotment Site (Site 1). Access to Manor Hall Road former market garden (Site 2) is via a passageway between 143 and 145 Manor Hall Road. Access could also be gained via the narrow access to the rear of 157-201 Manor Hall Road</i></p>

		<p><i>The other proposals for this site as small-scale community use or an open space on face value could be potentially advantageous to the area.</i></p>	<p><i>which currently serves the garages to the rear of this property. Paragraphs 2.6, 2.7 have been added for clarification and paragraph 4.11 explains the policy position.</i></p> <p><i>Noted</i></p>
3.	Resident	<p><i>Site 2 – strongly object to housing on this site for the following reasons. New housing would be near to an electricity sub-station and pylons which is a health issue. The existing woodland area attracts all kinds of wildlife - i.e. birds, foxes and also badger sett. Houses would overlook bungalows in Hadrian Avenue and privacy would a major issue.</i></p> <p><i>Support its use as an open space to include new allotment provision. This would be a good community use.</i></p>	<p><i>This site is not currently considered suitable for housing development, given the sub -standard access, location of the substation and underground cables. However, the site will be monitored through the Strategic Housing Land Availability Assessment and will be reassessed in the event that the constraints can be overcome.</i></p> <p><i>Noted</i></p>
4.	Resident	<p><i>Object as follows:</i></p> <ol style="list-style-type: none"> <li><i>1. Site 2 is directly behind us and any new properties would overlook our property. Would consider this to be potentially overbearing and intrusive. Have a similar concern if the land was also of "small scale community use" which could make access to the rear of our properties vulnerable. It would also cause an unacceptable loss of privacy and the current tranquil conditions enjoyed by many would be affected i.e. increased noise; disturbance and possible nuisance.</i></li> <li><i>2. Local development so close to our homes would definitely have an impact on the value of our properties.</i></li> <li><i>3. Concern that changes would make elderly residents feel nervous.</i></li> </ol>	<p><i>This site is not currently considered suitable for housing development, given the sub -standard access, location of the substation and underground cables. However, the site will be monitored through the Strategic Housing Land Availability Assessment and will be reassessed in the event that the constraints can be overcome.</i></p>

		<p>4. <i>Parking &amp; traffic is already a problem within the area as Hadrian Ave &amp; Manor Hall Road are currently used as "rabbit runs" between the A259 &amp; the Old Shoreham Road. There are already numerous minor traffic accidents at the mini-roundabout at the bottom of Hadrian Avenue. On-road parking is quickly becoming an issue.</i></p> <p>5. <i>Access is a cause for concern. Turning off Manor Hall Road is always difficult and trying to cross the Old Shoreham Road at the northern end of the site can be quite hazardous particularly during peak travelling times.</i></p> <p>6. <i>Infrastructure is of concern. Water pressure has been considerably reduced over the years so any new development would continue to add to the problem. There is also a major electric sub-station at the site and overhead pylons which could incur potential safety hazards.</i></p> <p>7. <i>Wildlife is of concern with impact on habitats &amp; maintenance of green-land / trees. There are numerous birds (including sparrowhawks); foxes / squirrels &amp; badgers that use the region as a habitat. The trees add extra security to our homes. Do any of the trees have preservation orders?</i></p> <p>8. <i>Due to the lack of "green space" within the area perhaps the council should consider turning the land into a conservation area for local wildlife rather than development?</i></p>	
5.	Resident	<i>Site 2 - welcome its use as an open space, and/or a community project, but not for use as housing.</i>	<i>Noted</i>
6.	Resident	<i>Site 2 – object to the use of the site for housing – overlooking, loss of privacy.</i>	<i>This site is not currently considered suitable for housing development, given the sub -standard access, location of the substation and underground cables. However, the site will be monitored through the Strategic Housing Land Availability Assessment and will be reassessed in the event that the constraints can be overcome.</i>

		<i>Do not have a problem with the small scale community use or open space.</i>	<i>Noted</i>
7.	Resident	<i>Site 2 – expresses concern about the proposal to consider Housing or small scale community use on this site. It is near a sub-station and overhead wires which pose health and safety issues. Concerned about the impact this would have on traffic using Hadrian Avenue which is used as a short cut to Brighton and Hove especially at busy times of the day. Would impact on wildlife.</i>	<i>This site is not currently considered suitable for housing development, given the sub -standard access, location of the substation and underground cables. However, the site will be monitored through the Strategic Housing Land Availability Assessment and will be reassessed in the event that the constraints can be overcome.</i>  <i>Any community use on this site would have to comply with health and safety standards</i>
8.	Resident	<i>Site 2 - concern that development would de-value property. The land is difficult to access. Due to the electricity sub-station and underground cables in this area, it would be totally unsuitable and undesirable, and would deter people from buying/living in homes in this area. Consider that the infrastructure and services in the area could not cope with more housing as the schools, doctors surgeries, dentists, etc. are already seriously stretched.</i>	<i>This site is not currently considered suitable for housing development, given the sub -standard access, location of the substation and underground cables. However, the site will be monitored through the Strategic Housing Land Availability Assessment and will be reassessed in the event that the constraints can be overcome.</i>
9.	Resident	<i>Site 3 - A lovely idea but I have reservations as do other residents in Manor Close. Concerned that the high fence should be retained for security reasons and the area should be locked at night to prevent its misuse. There are slow worms on the site and they are a protected species.</i>	<i>A reference has been added stating the importance of consulting on any potential use of this site with Adur and Worthing Councils Safer Communities Team.</i>

	Contact Details	Response	
10.	Major Project Director Adur and Worthing Business Partnership	<i>Agree that unused areas should be brought back into use. However any funding from development must be ring fenced for upgrading.</i>	<i>Noted</i>
11.	Planning and Transport Policy Team, West Sussex County Council	<i>Please note, we do not usually provide detailed comments on development briefs unless they are for strategic sites emerging in Local Plans.</i>	<i>Noted</i>
12.	Environmental Health Technician – Contaminated Land		<i>Map added in paragraph 4.8.</i>

13.	Estates Surveyor (Adur District)	<p><i>Adur District Council is the freehold owner of Site 2 only. Access to the site is limited but could be gained across Council-owned land either through the adjoining allotment site or the narrow access road to the rear of 157 - 201 Manor Hall Road. There may be statutory limitations on access across the allotments, but the Council has previously established a Deed of Grant for those properties currently using the access road.</i></p> <p><i>The site itself is encumbered with two cable easements granted to Seeboard PLC, one of which extends to the passageway between 143 and 145 Manor Hall Road. The passageway is not, however, shown as Council-owned. As I understand it, this is a very important power cable and it put pay to any further Council use of the market garden land. I'm not aware of any lift and divert clause within the agreement.</i></p>	<p><i>New paragraphs 2.6 and 2.7 have been added for information.</i></p>
14.	Development Director Shoreham Port	<p><i>It won't be an easy site to develop with all the constraints and demands. It could be seen as too difficult or unviable by some businesses, particularly the very ones we want to encourage to relocate there. There needs to be a better balance between promoting the site and explaining the requirements e.g. I would move Chapter 6 to number 3 so businesses and developers can see at the start what the site can be used for, before they read about all the hurdles they will have to overcome. The language could be more positive rather than terms like "the following uses have been deemed appropriate" it could say "these are uses we wish to promote" (6.1.1).</i></p> <p><i>As an encouragement for developers/local firms to take a serious look at Site 1 it would be worth doing a little more work on showing the potential e.g. the possible size of development achievable and a simple indicative layout, avoiding the power lines and the underground pipelines. Also a single combined constraints map particularly for Site 1 would be very useful.</i></p>	<p><i>Noted. The word "deemed" has been replaced with "appropriate" in para 5.1</i></p> <p><i>Noted. However, a single constraints map would be difficult to read.</i></p>

<p><i>In 6.2.3 Can you widen it to office, warehousing and light industrial uses in the first line. Also I don't think you should restrict the potential for relocation from the Harbour to those firms in the Western Arm (in 4.4.1, 6.2.3 and figure 7). There is no reason why the site can't accommodate businesses from other parts of the Harbour to free up sites in Portslade as well as Shoreham. Also it shouldn't be to "facilitate regeneration in Adur" only as it will benefit B&amp;H as well (B&amp;HCC even own it). The JAAP doesn't restrict it to the Western Arm. I don't really understand the statement "subject to use of appropriate lorry movements". Again if we want some of the firms to be relocated from the Harbour, all of whom generate traffic, then let's not put them off by giving them the impression we don't want firms who cause traffic. If on the other hand traffic is a real issue on the A270 (due to air quality and congestion) let's not pretend the site is a viable option for firms at the Harbour.</i></p> <p><i>It is not clear what you are expecting in terms of "public space" (5.13.2). The term has a specific meaning in planning law. Do you actually mean good quality "public areas" (the streetscape) or do you actually want some specific space to meet a local need.</i></p> <p><i>In 6.2.5 it says the ground floors should be non-residential, which suggests the upper floors can be residential - is that what you want? I agree we don't want larger retail uses on the site, but it is almost a throwaway line at the end with no explanation at all.</i></p> <p><i>In listing the possible uses for Site 1 you don't specifically mention trade counters warehousing such as builders' merchants, which could be a good use of the site and one which some businesses at the harbour would be very interested in.</i></p> <p><i>Finally, to be helpful to the reader of the Brief should include links e.g. to the WSCC standards (5.7) and Archaeology Team (5.12) and what about adding supporting documents that developers would</i></p>	<p><i>Agree. The para (now 5.4) has been amended to make reference to B1/B8 uses in the first sentence. Reference to the Western Arm has been removed and has been replaced with reference to the Harbour. Paras 4.4.1 (now 3.10) and Figure 7 (now figure 4) have also been amended. Reference to "appropriate lorry movements" has been deleted.</i></p> <p><i>Reference to "public space" has been deleted and text amended to refer to "public footpath improvements" (now para 4.21)</i></p> <p><i>This paragraph (now 5.6) refers to the potential to extend the current local parade along Old Shoreham Road, where residential uses at upper floor level would be appropriate. The last sentence has been amended to make it clear that larger retail/leisure uses would not be appropriate in this out of town location.</i></p> <p><i>Noted. Not considered necessary to specifically mention this. Such uses would be considered on their merits.</i></p> <p><i>Noted.</i></p>
---	---

		<i>find useful e.g. on contamination.</i>	
15.	Senior Environmental Health Officer	<p><i>My comments relate to air quality and consist of the following.</i></p> <p><i>Section 5.8.1</i>  <i>Any development will also need to consider the impacts on the nearby Brighton &amp; Hove 2013 AQMA in Portslade.</i></p> <p><i>Air Quality and emissions mitigation guidance for Sussex authorities provides a Sussex-wide approach for assessing potential air quality impacts from development and transport related emissions and provide a consistent approach to mitigating those impacts. Mitigation measures that will need to be introduced for development that contributes towards traffic generation. Any development will need to follow the procedures set out in the guidance.</i></p>	<p><i>Text amended to make reference to the Brighton &amp; Hove AQMA in Portslade.</i></p> <p><i>Noted – text makes reference to this guidance in paragraph 4.13.</i></p>
16.	Owner of Site 3	<i>It's good to know things are now under way and will be pleased if you will let me know of any local meeting that I should attend.</i>	<i>Noted</i>
17.	Cllr Jim Funnel Cllr Dave Donaldson	<p><i>1. (Former) Eastbrook Allotments – The pylons and the overhead cables on the site are a significant constraint to the potential development opportunities, therefore the site is not suitable for residential use but most certainly provides the opportunity for a range of businesses, especially those who could be relocated there from the Shoreham Harbour Western Arm. There is good access from the A270 at the northern end of the site. This site could provide increased work opportunities for local people.</i></p> <p><i>2. Manor Hall Road Former Market Garden – The major problem for the housing development suggestion for this site is the difficulty of gaining access to the area, the footpaths are narrow and the access roads are not wide enough and only support access to the garages. It is considered that this area is less suitable for uses requiring vehicular access. Manor Hall Road already has problems with vehicles parking on the grass verges thus narrowing the width of</i></p>	<i>Noted</i>



		<p><i>road usage, also there are considerable problems at the junction into Old Barn Way. Alternatively the area could be used for an open space provision, community use or for allotments.</i></p> <p><i>3. Manor Hall Nursery – The problem with this site is that it is only accessible by the public footpath which separates Southwick and Portslade. The brief suggests open space or small – scale community use for the area, as this piece of land was previously a nursery it could be reverted back to that usage if there is an interested party, or failing that become an allotment if there are enough interested people.</i></p>	
18.	Natural England	<p><i>The area does fall within buffer zones for the South Downs National Park and several SSSI. However, the Eastbrook sites are all well within the existing built-up area boundaries and the document appears to deal reasonably with the natural environment so we have no particular concerns at this stage. We particularly welcome the encouragement to undertake habitat surveys and build measures to enhance biodiversity into proposals. We also support the commitment to protect, and possibly improve, existing allotments and the aspiration to create additional green space and public access.</i></p>	<i>Noted</i>
19.	West Sussex County Council	<p><i>Officer level observations:</i></p> <p><i>Heritage</i>  <i>We agree with the precautionary approach to archaeological importance set out in section 5.12, which is wholly consistent with NPPF guidance. Archaeological mitigation could be covered by a planning condition requiring the developer to undertake an archaeological investigation and recording exercise subject to a written scheme of investigation (WSI). The level of investigation and recording would be proportionate to the degree of disturbance likely to be generated by the development.</i></p>	<i>Noted</i>

		<p><i>Transport</i>  Paragraph 5.7.2. refers to a Transport Assessment being needed to ascertain the impacts of any new development, the scale of development proposed will determine the level of transport analysis required which may be a Transport Statement or a Transport Assessment. We would recommend that the Developer engages WSCC for highways pre-application advice at the appropriate time.</p> <p><i>There is no requirement to consider the cumulative impact of the development sites on the local network, in accordance with paragraph 32 of the NPPF. A mixture of business and residential uses is likely to generate a mixed flow of movements so have greater impact on junction operation, and taken cumulatively it is likely to trigger thresholds for junction assessment.</i></p> <p><i>Given its location the uptake of sustainable modes of transport should be promoted; the larger sites should be supported by a Travel Plan, residential/business accordingly, in accordance with NPPF paragraph 36, and supported by relevant improvements to the local infrastructure to facilitate modal choice.</i></p> <p><i>Reference is made to Parking Standards, but should also include reference to the Parking Demand Calculator for the residential aspect. We note that vehicular access to site 2 appears to be difficult, and possibly not achievable, so it is being considered for a community use. This is likely to generate a demand for parking still and if no vehicular access is provided to the site the Developer will need to consider how this demand is accommodated and managed.</i></p>	<p><i>Text amended to make reference to transport statement.(para 4.10)</i></p> <p><i>Noted</i></p> <p><i>Additional paragraph added to reflect this (para 4.12).</i></p> <p><i>Text amended to make reference to Parking Demand Calculator (para 4.14)</i></p>
20.	<p>Planning, Economic Development and Property  Brighton &amp; Hove City Council</p>	<p><i>Brighton &amp; Hove City Council (Planning, Economic Development and Property) are generally supportive but have the following comments:</i></p> <p><i>Para 6.2.3 - makes reference to the relocation of light industry from Shoreham Harbour as part of the port regeneration proposals which</i></p>	<p><i>Disagree. There are residential uses in the vicinity of the site and B2 uses would not be appropriate in this</i></p>

		<p><i>is supported. However we would propose that the site is suitable for B2 uses as well as B1/B8 as it is not bordered by residential use and this could allow other businesses uses that fall under the B2 use the opportunity to relocate adding an element of flexibility of uses within the B use Class.</i></p> <p><i>Para 7.2.1- lists key stakeholders and it is proposed that Brighton &amp; Hove Allotment Federation be included on this list.</i></p>	<p><i>location.</i></p> <p><i>Added to list in para 6.1.</i></p>
21.	Partnership Co-ordinator Safer Communities Team, Adur and Worthing	<p><i>Site 3 – would like to be involved in the design of this site given it has no vehicular access and could attract young people.</i></p> <p><i>Site 2 – if the site is developed for housing then there is concern about road safety and the need to provide adequate car parking as this causes us a lot of community tension locally.</i></p>	<p><i>Paragraph added making reference to the importance of consulting with the Safer Communities Team.</i></p> <p><i>Noted</i></p>
22.	Highways Agency	<p><i>Concern with any potential impact on the A27, A270 and the Hangleton Link</i></p> <p><i>Site 1 – likely that “business development” would have an impact on the A27 and appropriate mitigation would be required.</i></p> <p><i>Site 2 – further clarification on scale of impact needed if the site is developed for housing</i></p> <p><i>Site 3 - unlikely to have an impact.</i></p> <p><i>Transport Assessment (and if necessary Travel Plans) will be required to support a planning application.</i></p>	<p><i>Noted</i></p>
23.	West Sussex Local Access Forum (WSLAF)	<p><i>Supports the opportunities to improve/upgrade existing off-road routes.</i></p> <p><i>It should be noted that, whilst the Sussex Border Path starts approximately 400m north of the site, footpath 14So has already been signed to Fishersgate Railway Station as part of the Sussex Border Path and it is intended to include this route as part of the Sussex Border Path once this has been agreed with West Sussex County Council.</i></p>	<p><i>Noted</i></p>

