

**Appendix 2: Representations Received in Response to Application for Designation of Shoreham Beach Neighbourhood Forum.**

<b>Respondent</b>	<b>Is the Forum representative of the people who live in the area?</b>	<b>Is the Forum representative of all the different geographical parts of the area?</b>	<b>Is the Forum representative of people who work in the area?</b>	<b>Is the Forum representative of different sections of the community in the area?</b>	<b>Further comments</b>	<b>ADC response</b>
Shoreham Beach Residents Association	ADC's online consultation form specifically asks if the Forum represents the people who live and work on the Beach, in terms of geographical representation and by demographics. We would make the following comments: For an organisation to represent its membership, it must comply with all aspects of its Constitution and hold an AGM. The supporting info there are 540 members of the Forum. It is impossible to know if these are current. There has not				Historically, Shoreham Beach Residents' Association has endeavoured to work with the Shoreham Beach Neighbourhood Forum in partnership and has supported the principles of neighbourhood planning. The two organisations have many common aims and objectives. SBRA acknowledges that considerable volunteer time has been invested in delivering the emerging	Issues regarding communication with members and compliance with Constitution are noted.  However these fall outside of the legislative requirements for designation of Forum

	<p>been an AGM since March 2018 and communication with the membership is at best patchy and frequently non-existent. Apart from the SBNF website, the main communication tool appears to be the SBRA magazine, Beach News. This is produced three times a year - not quarterly as claimed in the rmaton says supporting SBNF information for re-designation purposes. The website is not up-to-date and is frequently difficult to use. It fails to load easily from a mobile phone or tablet. For example, there was no link to the re-designation consultation exercise from the SBNF website's home page, when viewed on May 17th. The Forum has also failed to circulate details of the consultation</p>				<p>Neighbourhood Plan, not to mention substantial amounts of public money.</p>	
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	<p>exercise to its membership database. The Forum also fails to comply with its constitution for the following reasons:</p> <ol style="list-style-type: none"><li>1) Management committee papers and minutes are not posted monthly on the website. The most recent set of management minutes appears to be September 19 and there few sets of minutes posted previously</li><li>2) Finance reports detailing all expenditure and transactions should be presented to the Management Committee monthly. It is impossible to know if this has happened as the minutes are not posted regularly.</li><li>3) The membership should be invited to at least three meetings a year. This has not happened.</li><li>4) There is infrequent</li></ol>					
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	<p>communication to the membership in any format apart from Beach News In summary, the SBRA is deeply concerned that the Forum cannot claim to represent local people as there is frequent non-compliance with the Constitution and there has been no AGM. Likewise, an organisation cannot represent people who live and work on the Beach unless there is communication, engagement and accountability</p>					
Resident 1	<p>According to the application for designation the Forum has 540 resident members (with 345 contactable by email). Unfortunately however they (the 'members') haven't been meaningfully (with regard to the emerging</p>	<p>The Local Nature Reserve and the Shoreham Fort, a scheduled ancient monument aren't represented in any significant way in the Draft Plan - which is not in keeping with their importance</p>	-	<p>The Forum's current Draft Plan refers to the committee's aspiration to set up an unelected Design Review Panel that alone (ie without community engagement/ consultation) and on an ongoing basis,</p>	<p>The last AGM was held in 2018 (April) - while the SBNF's constitution requires one to be held every 15 months. That's now over two years ago. Also there seem to be some inconsistencies between the content</p>	<p>Issues regarding compliance with the Forum's Constitution and communication with members are noted. However these fall outside of the legislative requirements for designation of</p>

	<p>plan) engaged since the last public consultation (Have Your Say Day) in 2016. There have not been any public consultations about the Draft Plan since 2016, despite the Forum's constitution requiring it to organise a minimum of two Have Your Say events each year. The last AGM in 2018 was very much focused on the appointment of today's SBNF committee and so there was little time (if any) to discuss the Draft Plan itself. This means that the various changes made to the Draft Plan, since 2016, have not been actively and robustly shared with the community. So the community has not been properly engaged and therefore has not had the chance to comment on the many iterations of and significant changes to the Draft Plan. So it</p>	<p>to the community and visitors.</p>		<p>would provide 'professionally informed' comment on developments taking place in the area. This Panel would also decide which developments they intended to comment on. This would further distance the plan from being representative of the many diverse views and sections of the community. Who would have no influence over the decisions of the Panel. Also the focus on recruiting professionals to a Design Review Panel would elevate the view of a very few people over the many people in the community who would be impacted by any developments. As</p>	<p>of the Design Code and the actual Draft Plan. An example of one confusing inconsistency is the introduction, in the Design Code document, of a Beach Green Concept Plan Option B which shows the Beach Green car park becoming predominantly a site for a residential development. This seems to go against the feedback from the household survey in 2015 where people fed back that their top 'key consideration' for new developments (with regard to the Beach Green toilet block) was parking. And also when you compare this content (ie the inclusion of an Option B ) in the</p>	<p>Forum.</p> <p>Local Nature Reserve and Shoreham Fort lie within the designated Neighbourhood Area. Issues regarding the content of the Plan, including any Design Code or Design Review Panel should be addressed through the neighbourhood plan process itself.</p>
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	<p>can no longer really be described as 'community-led'. This lack of public consultation includes the development of a Design Code which is presented as a standalone document (ie outside of the Draft Plan). Just a couple of the changes that the community has not been engaged with are:</p> <ul style="list-style-type: none"> <li>• The development of a Design Code and the creation of a Design Review Panel (including how the panel would work). Both of these are very significant developments that have not been evolved through community consultation.</li> <li>• The 'strike through' of the following words on the Draft Plan and Design Code (words representing the aspirations fed back by the community). Those words are to:</li> </ul>			<p>would the stipulation that the only non experts allowed on the Panel would be "residents with experience of the application of the statutory planning process in recent developments in the Neighbourhood Area." Another condition set by the Forum's committee which further removes the Forum /Draft Plan from being representative of the different sections of the community, is that only two members of the Design Review Panel alone will be able to pick the planning applications to be commented on. In addition, there is no governance proposed to ensure the Panel, heavily influenced by</p>	<p>Design Code to the content of the Draft Plan there is a big inconsistency. In the Draft Plan only Option A is shared and not Option B. Option A being the "residents' preferred option" where a significant amount of parking space is retained. This is really confusing for people trying to understand what is actually being proposed. In the application for the re-designation of the Shoreham Beach Neighbourhood Forum it states that "following re-designation the Forum will be able to promptly progress towards the statutory Regulation 14 Consultation". This is concerning as it would only give the</p>	
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	<p>-“Protect/enhance cherished views into, out of and within the Beach” which has been taken out of the Policy NR 1. - “respect the density of existing development” which has also now got a line through it as well. Both of these aspirations came from community feedback. So in effect, I feel that while some great community engagement was done in the past, that is no longer the case and the Forum &amp; Draft Plan are no longer representative of the people that live in the area. There are other forums in the Shoreham Beach area (Shoreham Fort, FoSB and Shoreham Beach Residents Association) who have actively engaged members. I think these alternative forums would be better placed than a re-designated Forum to</p>			<p>professionals, remains independent, transparent and accountable to all the sections of the community it is meant to represent and serve. As far as I can see, the creation of the Design Review Panel (as it stands today) has emerged from a single question in a 2015 survey. It’s therefore an extensive interpretation of one question and really should have been explored in depth with the different sections of the community, to get their input and to help shape it. The Government guidelines on preparing a neighbourhood plan require that it should be “clear and</p>	<p>community one opportunity (one consultation) to find out about and give feedback on the current Draft Plan and the Design Code and navigate any inconsistencies and implications. That’s also an issue when you look at the length of time between the last proactive community engagement work which took place in 2016 (with the Have Your Say campaigns) and the number of changes that have been made to the plan since. So I believe it is unrealistic and unfair to ask the community to become re-engaged so quickly, after such a dormant period, and with so much information to take</p>	
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	<p>champion and consult their members on any good ideas and initiatives captured by the Draft Plan.</p>			<p>unambiguous...draft ed with sufficient clarity that a decision maker can apply it consistently and with confidence". This should eliminate the need for any Design Review Panel.</p>	<p>on board and comment on. This impossible task would stop the plan from being representative of the views of an informed and engaged community. It's unfortunate that the engagement of the local community has been lost by the Forum (and its Draft Plan) and I don't see how this is recoverable. But there are other forums on Shoreham Beach (previously listed) that have an active membership, good relationships with the local council and can take up some of the ideas from the original public consultations. These alternative forums would not require any more public funding. In</p>	
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					<p>addition these forums are held accountable to their members (from the community) who provide their funding. An accountability that does not seem to be present in the Shoreham Beach Neighbourhood Forum</p>	
<p>Resident 2 (also on behalf of seven others).</p>	<p>As residents bordering Beach Green, we question the viability of the Neighbourhood Plan especially in the current climate. So far, there has been very little direct communication and consultation regarding the 'vision' for the area. In the past, there has been a lack of information to those households who will feel the greatest effects of any developments, including the houseboat and beach hut owners.</p>				<p>It was unclear in NF's plans what is meant by a 'café and community centre' to replace the present toilet block, an issue causing a lot of distress when BoxPark's plans were unveiled. We should like to be involved in the intention of NF's specific plans.</p> <p>The building of a Multi-Use Games Area, possibly with</p>	<p>Issue regarding communication noted. Matters relating to the content of the Plan should be addressed through the neighbourhood plan process.</p>

	<p>We wonder where 'neighbour' has been taken into account in 'Neighbourhood Forum'.</p>				<p>floodlights, will impact especially on the residents of River Close and the nearby houseboats.</p> <p>The issue of parking on local roads and pavements affects many households and needs to be addressed as a matter of some urgency. The plan states the intention of the Beach being 'a quiet, low emission neighbourhood with the flexibility to welcome and accommodate visitors during peak season' but lacking any detail as to how this might be achieved.</p> <p>The question of communication is all the more important as the website is not very user-friendly,</p>	
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					can't be downloaded from a phone and is difficult to access on a tablet. (It wouldn't accept and send this submission!)	
Resident 3	Unless the membership is published how can that be determined?	Not in my opinion.	No as I have never been officially consulted	No	The group that are running this do not have a clear understanding of what is needed, and would seem to be focused on individual thoughts as to what is needed in our area	A map indicating the spread of membership is set out in the Application for designation. This response does not explain concerns regarding lack of representation of geographical area or sections of community.
Resident 4	--	No- we need to specifically include and describe Shoreham Beach LNR and also the RSPB reserve on the River Adur. While grassy areas are important natural wild spaces	-	Elderly overlooked regarding sheltered housing, or building of new sheltered housing- this should be a priority- if older people can move out of their huge "family" homes into safe and comfortable sheltered housing this would free up more housing for		Comments noted. However these relate to content of the Plan and are best addressed through the plan process.

		are vital.		younger people/families		
Resident 5	Reasonably	Yes - representative of geographical area	Reasonably	Yes - representative of different sections of the community.	No further comments	Comments noted.
Resident 6	I don't think so, again a straw poll of my street found very few aware of its existence or potential impact.	Vaguely, there are a lot of expectations. not much detail.	I don't think so, I'm not sure a lot of people are even aware of its existence	It may reference them, but I am unaware of detailed discussion certainly with regard to the Local Nature Reserve there have been no specific meetings with the committee other than at the public meetings.	I think it has not reached the majority of those it sets out to affect. Communication has been limited, if at all and whilst initial views were sought at various meetings. follow up has been poor to non existent	Comments noted regarding awareness of neighbourhood plan in local area, and communication