

## Appendices 1 and 2

### Appendix 1:

#### Response to representations on Adur & Worthing SHLAA Methodology consultation and Changes made in response

(24<sup>th</sup> February – 20<sup>th</sup> March 2020)

| RESPONDENT       | RESPONSE  | COUNCILS RESPONSE   |
|------------------|---|---|
| Sport England    | Recommend that in table 4 (pages 14 – 15) ‘potential constraints’ that the presence of playing fields (or land last in use for playing fields and not developed) is listed amongst the potential constraints to be identified.  | Playing fields currently falls into the category ‘community facilities’. However this has been modified for clarity in the methodology and to align with local plan terminology.  |
| SGN Gas          | We do not have any relevant comments to pass on. However, if there is any specific questions you wish to ask us regarding the gas infrastructure, please do not hesitate to send them over. We also look forward to the new SHLAA becoming available and we are happy to provide feedback on the impact that the developments have on the gas network.  | Noted   |
| Highways England | No specific comments on the methodology   | Noted.  |
| Historic England | <p>A detailed methodology for the assessment of the potential impact of possible sites on heritage assets should include the following factors:</p> <ul style="list-style-type: none"> <li>• All heritage assets should be considered encompassing buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions, because of their heritage interest (archaeological, architectural, artistic or historic). These include designated heritage assets and other assets identified by the local planning authority (including local listing).</li> <li>• Implications of development (positive and negative) for the setting of a heritage asset and its significance should be considered.</li> <li>• The potential archaeological interest of a site.</li> <li>• In considering implications for landscape and townscape character, relevant information on the present day historic character of places should be utilised for example historic landscape characterisation, historic environment assessments, historic area assessments, extensive urban surveys and conservation area appraisals, and other historic characterisation studies.</li> <li>• The specific consideration of settlement character may also be appropriate, as for example whether development would significantly alter the historic settlement pattern (positively or negatively).</li> </ul> | Noted. Heritage assets (and potential impact on their settings) are taken account of in the SHLAA assessment process. (Table 4: Potential Constraints considers the impact of development on heritage assets and the points made in this response will be taken into account in the assessment). However this will be made more explicit in the methodology   |
| CPRE             | <p>Generally, the methodology conforms to national guidance.<br/>We would like to see the following amendments;</p> <p>Page 10 item 3.15<br/>(Last box in form under Environmental Constraints on that page)<br/>Add “and/or for &gt;75% risk of flooding from groundwater within a Zone 3a flood risk area. (Refer A-W groundwater flood risk map)’</p>  | <p>Noted.</p> <p>No amendment made to methodology. In the interests of considering all development opportunities and “leaving no stone unturned” only sites falling within Flood Zone 3b will be automatically excluded from further assessment. However, the Adur and Worthing Flood Maps, advice from the Environment Agency and WSCC will be taken into account undertaking the detailed site assessment which may result in</p> |

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|-----------------|---|--|
|                 | <p>Page 11 Item 3.15 Environmental Constraints (continued)<br/>Add new box<br/>Category 'Sites within areas with above limits of air pollution for NO2/particulates'<br/>Reason To comply with national requirements on air pollution limits</p> <p>Page 15 Table 4<br/>Bottom right hand box<br/><b>Not suitable:</b> Development of the site would result in unacceptable loss/disturbance/harm to heritage assets that could not be satisfactorily mitigated. There would be unacceptable loss or Disturbance of significant wildlife habitat or species<br/>(add) which conflicts with Local Plan environmental policies</p> <p>Page 16 Item 3.28<br/>Support the assessment of covenants which may create a constraint. Covenants are not normally part of a planning application consideration.</p>     | <p>a site being rejected for future development.</p> <p>No amendment made to methodology. In the interests of considering all development opportunities and "leaving no stone unturned" sites falling within designated Air Quality Management Areas where air pollution for NO2/particulates are above limits will not automatically be excluded from the assessment. However, advice from Environmental Health colleagues will be taken into account when undertaking the detailed site assessment which may result in a site being rejected for future development.</p> <p>Amendment made.<br/>Table 4 – Potential Impact of Development – third sentence amended to read:<br/>"Any conflict with relevant national and Local Plan policies will be taken into account when considering the impact of the following constraints:</p> <p>Noted</p> |
| Natural England | <p>We support the general approach to the updated methodology. We recognised that there is specific reference to excluding sites in or outside SSSIs that would cause an adverse effect in line with NPPF. Also we recognise that as part of your Potential Constraints table you have concluded that sites would not be suitable where "there would be unacceptable loss or disturbance of significant wildlife habitat or species."<br/>As a matter of clarity we would reiterate that impacts on habitat and species could be direct or indirect. So when assessing sites there is a need to consider indirect impacts in terms of water/air pollution for example, as well as direct loss. The Impact Risk Zones you are already using are a good way to identify the potential for indirect impacts.</p> | Noted. No amendments to methodology required.  |
| Persimmon Homes | <p>Response outlines relationship between SHLAA and emerging Worthing Local Plan.</p> <p>Paras 1.2 and 4.1 states general support for SHLAA's approach and methodology, although state that Worthing Local Plan must allocate sufficient land to meet objectively assessed needs.</p> <p>Para 3.7 refers to need to address delivery and implementation</p>   | <p>Noted.</p> <p>Noted.</p> <p>We can confirm that the methodology uses the NPPF definition of deliverability.</p>   |

APPENDIX 2 OTHER CHANGES TO METHODOLOGY

| <b>Section</b>                           | <b>Change</b>   | <b>Reason</b>   |
|--|---|---|
| Table 4, Potential Impact of Development | 'Landscape impact' added to list of potential constraints | To confirm landscape impacts form part of the assessment process. |