



Campaign to Protect
Rural England, Sussex Branch CIO
Brownings Farm, Blackboys,
East Sussex, TN22 5HG
Tel 01825 890975
e-mail info@cpresussex.org.uk
www.cpresussex.org.uk

Planning Policy,
Adur & Worthing Councils,
Portland House,
44 Richmond Road,
Worthing,
West Sussex,
BN11 1HS
By email: planning.policy@adur-worthing.gov.uk

20th March 2020

Dear Planning Policy Team

Adur & Worthing Councils, Strategic Housing Land Availability Assessment (SHLAA) Consultation on Updated Methodology, February 2020

This is the response from CPRE Sussex to the above consultation.

Generally, the methodology conforms to national guidance. We would like to see the following amendments;

Page 10
item 3.15

(Last box in form under Environmental Constraints on that page)

Add "and/or for >75% risk of flooding from groundwater within a Zone 3a flood risk area. (Refer A-W groundwater flood risk map)'

Page 11
Item 3.15
Environmental Constraints (continued)

Add new box

Category

'Sites within areas with above limits of air pollution for NO2/particulates'

Reason

To comply with national requirements on air pollution limits

Page 15

Table 4 continued

Bottom right hand box

Not suitable: 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

(add)

which conflicts with Local Plan environmental policies

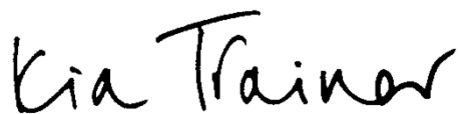
Page 16

Item 3.28

Support the assessment of covenants which may create a constraint. Covenants are not normally part of a planning application consideration.

As a general point, we would welcome greater emphasis on finding ways to bring forwards brownfield sites if not enough sites have come forward to meet the Housing Land Supply requirements.

Yours sincerely,

A handwritten signature in black ink that reads "Kia Trainor". The script is cursive and fluid, with the first letters of each word being capitalized and prominent.

Kia Trainor

Director, CPRE Sussex