

# REVISED DRAFT ADUR LOCAL PLAN 2013

CONSULTATION 26TH SEPTEMBER – 7TH NOVEMBER 2013

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<b>Company / organisation name (if relevant)</b>	<input type="text" value="Sompting Parish Council"/>		
<b>Your Full Address</b>	<input type="text" value="Harriet Johnson Centre"/>		
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(Where an agent's contact details are given, we will use these as our contact)

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## **Introduction**

The following statement was agreed at a meeting of Sompting Parish Council on 13 November 2013. The meeting was convened specifically to discuss the latest version of Adur District Council's Revised Draft Local Plan (The Plan). We note that the present draft of The Plan has policies which are markedly different from those in the previous draft. We also note that a considerable amount of supporting documentation has been produced recently. This has been scrutinised by the Parish Council.

We wish to thank Adur District Council for allowing an extension to the deadline for submission of comments on their plan. This extension was requested to allow consideration of The Plan at our regular monthly council meeting rather than being inconvenienced by calling a special meeting.

In formulating our response to Policies 3 and 6 (housing numbers) we have studied all of the supporting documentation. We have concluded that some of the assertions made in The Plan are open to question.

In summary, Sompting Parish Council is opposed to the scale of house building that is proposed in The Plan on a number of grounds. The Parish Council also challenges a number of the basic assertions made in The Plan.

Should any house building be necessary then the development should take the shape and form described in this document. We have endeavoured to be positive and realistic in our approach by appropriately balancing the various factors affecting development philosophy for Adur over the next 20 years. We trust that our comments will be given due weight given that Sompting Parish Council is entrusted with representing the nearly 9,000 residents.

Sompting Parish Council is the elected body representing the people of Sompting. In developing our response we have considered statements made by our residents, views expressed at a public meeting held at Sompting Village School on 26 October 2013, and results from the recently published 'Sompting Neighbourhood Plan 2014-2013, State of the Parish Report', published October 2013. Additionally, although there is no formal relationship between Sompting Parish Council and Big Local, members of the Parish Council have attended Big Local meetings as observers. Feedback from Big Local's consultations has been informally used.

This document will be made available to the general public. We have quoted extensively from original source material to assist our residents in following our proposals. This also makes it easier for those reviewing our response to follow our lines of arguments.

We have engaged in this process in a spirit of constructive criticism and cooperation. We feel assured that our views will be given significant weight.

## COMMENTS ON THE REVISED DRAFT ADUR LOCAL PLAN 2013

Comment relates to Map / Paragraph / Policy number:

Revised Draft Policy 3,  
Housing Provision

Do you:

Support

Object

Comment

Objections

### Objection 1: Total Number of Dwellings according to Sustainability Criteria

*Over the period 2011 – 2031 a minimum of 2797– 2947 dwellings will be developed in Adur, as follows:*

*817 within the built up area of Adur, plus*

*1050 as part of the Shoreham Harbour Regeneration Area Western Arm*

*450 - 600 at New Monks Farm*

*480 at West Sompting*

From Revised Draft Policy 3: Housing Provision

We challenge the housing requirement statement on a number of grounds.

We note from the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the Revised Draft Adur Local Plan (September 2013) that allowance is made for 2,797-2,947 dwellings. The sustainability criteria (and many other criteria) are based on these figures (Paragraph 7.1 point 1). Yet The Plan envisages a *minimum* allowance of these figures. Moreover, the 'Locally Generated Housing Needs Study Final Report May 2011', (LGHNS2011) considers a up to 5,000 homes based on using land outside of the urban area (i.e. Green field).

#### **TOTAL POTENTIAL LAND AVAILABLE**

*7.21 If the potential of all of the sites identified is included, including those sites outside of the existing urban area, we estimate that between 4,150 – 5,000 homes could be delivered over the period from 2006 to 2031.*

From LGHNS2011 Paragraph 7.21.

Sompting lies adjacent to one of the only two Green fields left under Adur District Council's control. This leads us to the conclusion that in the future there will be even more attempts to 'fill the gap' to the east of our village.

We therefore propose that the figure of 2,947 dwellings should be considered an upper limit, not a minimum. However, there are other issues apart from 'sustainability' that may affect even this figure.

## **Objection 2: Total Number of Dwellings Based on Growth Projections**

The Locally Generated Housing Needs Study 2011 includes an assessment of future housing needs based on two growth projections. These are summarised in paragraph 9.6:

***9.5 A realistic assessment of housing need/demand is for between 235 – 255 dwellings per annum over the period 2011-28, or for between 270 – 320 households for the period 2011-31. In both cases the higher end figure represents our assessment of housing need/demand based on past population and demographic trends (PROJ 1), whilst the lower figure adjusts this to take account of projected economic growth (PROJ 9).***

This paragraph is critical to understanding Adur District Council's policy for housing provision and therefore the requirement to build on sites adjacent to Sompting. (This paragraph is also quoted in the Background Evidence Document).

Projection 1 (PROJ1) assumes that existing levels of in-migration (for work and retirement) are maintained. Whereas in the past land, jobs and houses were available for industrial expansion, this is no longer the case. We conclude that 'PROJ1 (everything carries on as before) is not a viable scenario upon which to base housing needs.

Projection 9 (PROJ9) is based on the assumption that economic growth within the area will drive a requirement for more workers, hence more houses. However there are two mitigating factors to take into consideration: Firstly, the report says that the economic model does not take account of government spending cuts. These are a consequence of the national debt (among other causes). Diminished government expenditure is likely to remain the norm for a long time.

The second is that the Sustainability Report paragraph 3.7 states that '*...there is a scarcity of land available for economic development*'. Therefore, assuming that national economic growth forecasts (and therefore additional housing requirements) can be applied to Adur is erroneous.

**The housing demand for Adur is based on Projections 1 and 9. These projections seem unrealistic.**

Alternative growth models should be considered.

### **Objection 3 Based on Sustainable Communities**

*1.41 The National Planning Policy Framework published in March 2012 sets out national policy as a basis for plans such as this, and is a material consideration in determining planning applications. The presumption in favour of sustainable development is a fundamental principle of the NPPF26 which views the planning system as having three key roles:*

- (...)*
- a social role, supporting strong, vibrant and healthy communities; and*
- (...)*

From Revised Draft Adur District Plan 2013 (RDALP2013) Paragraph 1.41

The village of Sompting has seen far greater 'development' in its time than any other area in Adur. The pace of development over the years has provided many challenges to Sompting Parish Council. In particular, the construction of large property developments (as distinct from incremental enlargement) has resulted in disjointed communities. These communities are distinguished by age group, family situation, income group and dwelling type.

Sompting Parish Council (SPC) has endeavoured to develop Sompting's community identity throughout its history. SPC has organised the annual Sompting Festival, encouraged various user groups to meet at the Harriet Johnson Centre, provided an annual carol service and liaised with community groups such as the Lions, with a view to enhancing social cohesion. The creation of two new large housing estates would necessarily bring with it an influx of new people who are not socially connected to the village, and the work of building a sustainable community made even more challenging.

The diminution of the strategic gap between Sompting and Worthing would lead to the perception that Sompting is no more than a geographical zone within an urban sprawl. The coalescence of Lancing and Sompting villages has caused some loss of identity to both. However, we cannot turn the clock back. What we can do is to ensure that the Lancing and Sompting villages do not become part of a greater urban sprawl.

#### **Objection 4 Based on Total Housing Requirement**

We note especially from the LGHNS2011 that:

*Net in-migration to Adur is a key driver of population growth as the death rate in the District is higher than the birth rate. With no net migration, the population would decline marginally over the next 20 years, by -1.8% between 2006-26 (PROJ 2). With no net in-migration the population structure would also age more rapidly. However even with no net in-migration there will still be a requirement for more homes, as a result of changes in the age structure and household sizes. **1,354** households would be required to 2026 (68 per annum).*

From LGHNS2011 'Trend Based Projections, Executive Summary'

We would point out that population growth for Adur will have been taken from national statistics. These national figures will have been skewed by mass immigration in recent years. We are aware that national government is committed to addressing this issue. Therefore, even the above figure for housing requirements may be too large.

Also from the same study, under the 'Zero Net Migration Scenario (PROJ2)' the housing need falls to **1,354** for the period 2006 to 2026. When figures are re-calculated for the period covered by The Plan (2011-2031) it is not likely that the total requirement will change.

The figure for zero population growth (PROJ8) is **1,802**. Again, adjustments may need to be made to cover the period of The Plan. However, the point is that given the limitations in both job growth and available land for housing, the above two scenarios are realistic. The calculated demands for housing are both a lot less than those in the current Plan.

From the Background Evidence Document Table titled 'Indicative Housing Trajectory – Delivering 140 Dwellings Per Year', we note that net available new housing using Brown field sites only is **1,962** units. (This is based on 2,892 less 450 Monks Farm and 480 Sompting).

The Plan paragraph 2.31 suggests that **1,867** houses may be built on Brown field sites (based on SHLAA 2012)

We conclude that policies of zero population growth and / or zero net in-migration will result in future housing needs being met by use of existing Brown field sites only. This is deemed to be a pragmatic approach based on what can be achieved with what we have. It is possible to avoid use of Green field sites with appropriate policies.

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(This paragraph concludes by saying that 'A reduction in the population could impact on the viability of local services.' However we would contend this conclusion and say that local services would suffer with housing growth.

## COMMENTS ON THE REVISED DRAFT ADUR LOCAL PLAN 2013 (continued)

Comment relates to Map / Paragraph / Policy number:

Revised Draft Policy 3,  
Housing Provision

Do you:

Support

Object

Comment

Comments

### Alternative Wording for Policy 3

Adur District Council will adopt a policy of zero net in-migration into Adur unless there is an expansion in the number of jobs available. Where there is an expansion in the requirement for labour, preference shall be given to utilising the skills of local unemployed persons or drawing on the pool of residents who currently commute out of the district for work.

Over the period 2011-2031 up to approximately 2,000 houses may be built on Brown field sites including approximately 1,000 as part of Shoreham Harbour development and 1,000 within the built up area of Adur. These houses will be built at such a rate as to make provision for natural expansion in the local population.

Green field sites will not be considered until all Brown field sites have been used.

Where Green field sites must be used, the total number of houses (adjacent to Sompting) shall not exceed [the figure given for the 2012 draft].

If an expansion in the Adur workforce cannot be met by using local residents then additional housing (including use of Green field sites) may be considered.

The consequences of any development must not lead to further deterioration in traffic, further pollution or aggravate any other existing issues.

## COMMENTS ON THE REVISED DRAFT ADUR LOCAL PLAN 2013 (continued)

Comment relates to Map / Paragraph / Policy number:

Employment and Economy  
Planning: Planning for  
Economic Growth.  
Paragraphs 2.36 to 2.52

Do you:

Support

Object

Comment

Comments

Many of the housing and infrastructure development proposals arise from a vision for economic improvement. We note from paragraph 2.39 of The Plan:

*2.39 The recent economic downturn has not had a significant impact on Adur's economy, and although economic activity rates fell from 85% to 80% immediately after the downturn, they are now back to 85%.*

And from the Sustainability Appraisal and Strategic Environmental; Assessment 2013:

*3.12 As of 2012, 85.5% of the working age population in Adur were economically active which is higher than both the South East figure of 79.6% and the national figure of 76.9% (NOMIS).*

Employment prospects are better than average and local employment seems to be resilient in the face of economic downturns.

In respect of delivering a flexible economy, we note that:

*3.15 A significant amount of people that live in Adur commute to work outside of the district. Although there are no up-to-date figures regarding out-commuting, at the time of the 2001 Census only 43.7% of those living in the Adur district who are economically active actually worked in the district. The majority of those commuting out of the district were mainly travelling to Brighton & Hove and Worthing.*

Employment growth in Adur should be accommodated through the provision of local labour rather than importing new labour with consequent housing and infrastructure issues. The use of existing labour would also reduce the burden of commuting.



## COMMENTS ON THE REVISED DRAFT ADUR LOCAL PLAN 2013 (continued)

Comment relates to Map / Paragraph / Policy number:

Revised Draft Policy 6: Land  
at West Sompting  
Paragraphs 2.70 and 2.71

Do you:

Support

Object

Comment

Comments

Section 2 of The Plan reads:

*2.70 The 'Landscape and Ecological Survey of Key Sites Within the Adur District (2012)' states that the Sompting Fringe area is an exceptionally open arable landscape with an expansive scale and long views. It is assessed as having a high visual sensitivity and medium-high overall landscape sensitivity. The site is visible from a number of sensitive viewpoints within the National Park. As a result, any new development within the Sompting Fringe area must be designed sensitively and the Landscape and Ecological Survey sets out a number of development proposals to minimise the impact of development on the landscape. This includes, amongst other things, a number of tree clump 'islands' to soften the built edge of the development and provide a visual screen at key visually sensitive locations, and off site planting in hedgerows to the west.*

*2.71 The Landscape and Ecological Survey also assesses the Sompting North area and states that only the south east corner of the site is visible from sensitive viewpoints within the National Park, as it is generally shielded from views from the National Park by the landform on the lower slopes of the Downs. The site is assessed as being of medium landscape sensitivity.*

We are in agreement with the conclusions of the Landscape and Ecological Survey report insofar as they affect Sompting. We would propose that single storey buildings should be considered for Sompting Fringe and that they should be of a design which is sympathetic to those in adjacent areas. Similarly, houses in the Sompting North Area may be two-storey but should be built in a similar style to those in the older parts of Sompting.

## COMMENTS ON THE REVISED DRAFT ADUR LOCAL PLAN 2013 (continued)

Comment relates to Map / Paragraph / Policy number:

Revised Draft Policy 6: Land  
at West Sompting  
Paragraph 2.73

Do you:

Support

Object

Comment

Comments

*2.73 There are potential opportunities to open up the countryside between Sompting and Worthing to the public by providing a public footpath/cyclepath east-west to link with the employment areas of Worthing and East Worthing train station. The Teville Stream Restoration Project being promoted by the Environment Agency in partnership with Worthing Borough Council and the landowner, which aims to return the stream back to its natural state, may also provide opportunities to enhance access to the Local Green Gap.*

We support the opening up of public access to the Teville stream area. This would partially offset the loss of land to the north and east due to building development.

Consideration should be given to providing a cycle path across this site to east Worthing. Cyclists are likely to prefer dedicated cycle paths space from pedestrian walkways in the interests of safety.

The results of a survey in which the utility of such a route was raised resulted in a favourable response for both recreational cycling and as an alternative route to work or school. (Paragraphs 3.12 and 3.13 of the Sompting Neighbourhood Plan 2014-2031 State of the Parish Report)

## COMMENTS ON THE REVISED DRAFT ADUR LOCAL PLAN 2013 (continued)

Comment relates to Map / Paragraph / Policy number:

Revised Draft Policy 6: Land  
at West Sompting  
Paragraphs 2.74 and 2.77

Do you:

Support

Object

Comment

Comments

*2.74 Access to the southern part of site would be via Loose Lane and potentially a new access from West Street which would run along the western boundary of Sompting Fringe, forming a boundary to this part of the development. If this is implemented, it will give priority to traffic going to/ from the development.*

*2.75 Traffic from this site will have to pass through the congested North Lancing roundabout to travel east on the A27. Potential mitigation measures have been identified and will need to be delivered as part of the development. The A27/ Dankton Lane junction will require further investigation. In addition, any local road improvements affecting Sompting Village Conservation Area must respect its historic character.*

*2.76 West Street experiences traffic problems, in part caused by westbound traffic 'ratrunning' to bypass congestion on the A27. There is an existing traffic calming scheme on West Street and Upper Brighton Road. However, further traffic management is likely to be required on this route. This is likely to involve extending the traffic calming measures to the east and intensifying existing measures.*

*2.77 Prior to the submission of any planning application for this site, a full Transport Assessment will be required to look at access onto, and impact on local roads, and off-site impacts on existing junctions along the A27 and will need to demonstrate how the development will deliver the necessary mitigation measures.*

The probable impact of traffic is a matter of concern. Western Road, Busticle Lane and the A27 already suffer from considerable congestion at key times of the day. The problems are accurately recorded in the draft Infrastructure Delivery Plan 2013, Position Statement B. In summary, this Statement says that the current situation is desperate and that no one has any money or plans to do anything about it.

Some funding may become available from the Developers. However, since a large proportion of the new housing is expected to be 'Social Housing', the amount of funding available may be limited. We have doubts as to whether Developer Contributions will be sufficient to allow a significant improvement. (We also note that Developer Contributions are anticipated for expanding the provision of educational facilities. We believe that the Developer is being asked to support too much development out of his pocket).

We note from the Air Quality Action Plans that Grove Lodge roundabout already exceeds allowable levels of nitrogen dioxide. Additional traffic from the new developments may cause additional congestion on the A27 - possibly extending the affected area eastwards towards Sompting. This would be due to traffic being held up at the 'improved' road junctions envisaged to service the new developments (as described in the Draft Infrastructure Delivery Plan September 2013). We doubt as to whether a transport survey will result in any realistic mitigation measures to counter the increased congestion due to new developments.

## COMMENTS ON THE REVISED DRAFT ADUR LOCAL PLAN 2013 (continued)

Comment relates to Map / Paragraph / Policy number:

Revised Draft Policy 6: Land  
at West Sompting  
Paragraph 2.78

Do you:

Support

Object

Comment

Comments

*2.78 The site lies predominantly within Flood Zone 1 with small areas in Flood Zone 2, 3a and 3b. Parts of the site are at risk from surface water flooding, particularly the southernmost part. The site is also susceptible to ground water flooding. The site layout will be expected to direct development away from the areas most at risk and appropriate mitigation measures will be required to reduce all forms of flood risk across the site. A Flood Risk Assessment will be required at the planning application stage and this will need to show that not only can flood risk be mitigated on site but that flood risk will not be worsened elsewhere. Opportunities to improve flood risk in the area should also be sought where possible.*

We note from the Strategic Flood Risk Assessment January 2012 Section 4.2.2

*The site is partially within Flood Zone 2 and at high risk of groundwater emergence, therefore all development proposals should be accompanied by a FRA. Future development of Sompting Fringe should be mindful of the various sources of flood risk, and where possible implement sequential design throughout the site to try to reduce flood risk within the development.*

*(...)*

*However it should be noted that there is a detailed flood risk modelling study being undertaken along the Teville Stream [by the Environment Agency] , and any future development should look to use the outputs from this study to delineate the flood risk to the site.*

*The effect of climate change should be considered for all new development...No assessment has been made with regards the impact of climate change on surface water and groundwater flooding.*

*The site is at risk of surface water and groundwater flooding, therefore steps should be taken to reduce the consequence of flooding, i.e. sequentially plan a development so resilient uses are placed on the ground floor. Any future development should ensure that it would not increase the surface water or groundwater flood risk elsewhere, to achieve this any existing flow paths would need to be maintained. The site is green field so surface water drainage techniques should be built into any new design to ensure runoff does not increase. Also any subterranean development would need to be resilient to groundwater flooding, and not disrupt existing groundwater flow paths.*

From Strategic Flood Risk Assessment JBA Consulting 2012, Core Strategy Summary Sheet 9. A similar statement is included in Sheet 10.

A member of Sompting Parish Council has contacted the Environment Agency to obtain information on the latest stage of their detailed report for the Teville Stream area. Sompting Parish Council would recommend that Adur District Council make enquiries and review whether development of 'West Sompting' remains viable in respect of food risk.

Finally, the consultant recommends sustainable drainage systems (SuDS) be used. Given the state of the fields, the Developer will have to shovel a lot of mud to achieve this. Let us hope that he will not ruin the environment in the process.

## COMMENTS ON THE REVISED DRAFT ADUR LOCAL PLAN 2013 (continued)

Comment relates to Map / Paragraph / Policy number:

Revised Draft Policy 6: Land  
at West Sompting

Do you:

Support

Object

Comment

Comments

### Affordable Housing

We note the allowance of 80% for affordable housing. We would wish to draw attention to Sompting Neighbourhood Plan 2014-2031 State of the Parish Report paragraph 3.43. This states that most respondents to our questionnaire stated that they did not know of anyone who needed social housing. Although social housing was considered a probable requirement locally, this appears to be a perception rather than a reality.

When asked about their housing needs, most respondents stated semi-detached and bungalows (paragraph 3.45.)

The present tenure is about 15% of broadly defined 'social / affordable' housing. We recommend that any new developments should reflect local felt needs.

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**COMMENTS ON THE REVISED DRAFT ADUR LOCAL PLAN 2013 (continued)**

Comment relates to Map / Paragraph / Policy number:

**Revised Draft Policy 6: Land at West Sompting**

Do you:

Support

Object

Comment

Comments

**Objection – Number of Houses**

Refer to revised wording for Policy 3 above. We wish to keep the number of new houses to number suggested in the previous draft of The Plan.

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**COMMENTS ON THE REVISED DRAFT ADUR LOCAL PLAN 2013 (continued)**

Comment relates to Map / Paragraph / Policy number:

**The Wider Sompting Area  
Paragraph 3.12**

Do you:

Support

Object

Comment

Comments

**Localism and Local Democracy**

We object to the requirement that the Neighbourhood Plan should be written around Adur's Plan. Due consideration must be given to the already stated views of the people of Sompting as provided in the 'State of the Parish Report'.

**COMMENTS ON THE REVISED DRAFT ADUR LOCAL PLAN 2013 (continued)**

Comment relates to Map / Paragraph / Policy number:

**The Wider Sompting Area  
Paragraph 3.13**

Do you:

Support

Object

Comment

Comments

**Big Local**

The 'Big Local' is briefly mentioned in the Plan. We would wish to emphasise that this initiative is wholly independent of any aspect of government and no reliance can be placed on its work for achieving specific objectives set in The Plan. Our district councillors are well aware (and supportive) of our view that there should be no diminution of funding to Sompting arising from what Big Local may or may not do.



## COMMENTS ON THE REVISED DRAFT ADUR LOCAL PLAN 2013 (continued)

Comment relates to Map / Paragraph / Policy number:

Sustainable Design  
Paragraphs 4.17 to 4.23

Do you:

Support

Object

Comment

Comments

Technological developments in recent years have reduced energy usage considerably. Modern materials are durable. The high cost of energy has already forced people to adopt the best possible energy-saving measures. We anticipate that national standards in construction and energy usage already take account of the trade-off between the capital cost of insulation and lifetime costs of ownership. There is probably little justification in trying to 'guild the lily;' by insisting on higher than national standards for Sompting. Moreover, more-demanding criteria may bring with them costs that make 'affordable housing' less affordable.

In the area of water conservation, Sompting Parish Council have taken the initiative by responding to Southern Water's recent request for comments on their water supply philosophy document. We have asked for current water supply arrangements for Sompting. When this data become available (together with an assessment of future water demand), Sompting Parish Council will comment on any options available for increasing water supply. We do note from the Draft Infrastructure Delivery Plan that there are at present no issues expected with respect to water supply and waste water.

We note that some of the properties shortly to be built in Busticle Lane are to have 100% water recycling. This should not be imposed on new buildings at this time.

Moreover, we note that solar panels are only made economically viable by imposing a significant levy on other electricity bill payers. We believe this to be an unfair burden on society when balanced against the claimed benefits with respect to 'Climate Change.' 'Sustainable Energy' policies have already driven up energy bills to unsustainable levels.

## COMMENTS ON THE REVISED DRAFT ADUR LOCAL PLAN 2013 (continued)

Comment relates to Map / Paragraph / Policy number:

Sustainable Design  
Paragraphs 4.24

Do you:

Support

Object

Comment

Comments

*4.24 As detailed in Revised Draft Policy 17, the approach to reducing building related CO2 emissions should follow the energy hierarchy of demand reduction first, efficient energy supply next, followed by renewable energy generation. With respect to efficient energy supply, decentralised energy systems and networks can provide an extremely cost effective approach to minimising CO2 emissions especially where networks can be expanded to accommodate new and existing developments over time. Such networks could include, for example, specifically designed Combined Heat and Power systems (CHP) linked to district heating networks or utilising existing waste heat from industrial uses/ existing power stations through a district heating network. These types of systems represent a particularly efficient use of energy and should be considered by developers in new proposals.*

District heating schemes have been extensively used in former Soviet Republics. They are ugly (miles of above-ground pipes) and it is difficult to control the combined requirements of innumerable individual customers.

Modern, efficient domestic condensing boilers already compete favourably against District Heating schemes. Domestic boilers require limited household space. District Heating Plant requires special sites. Domestic boilers do not.

Combined heat and power schemes always suffer from competing and irreconcilable demands for either heat or power; something has to give. Moreover, larger power generation units are always more efficient than smaller ones. Therefore, any improvements in power delivery are more than offset by using less efficient generation plant.

We doubt that this solution is applicable to Sompting.

**Future Consultation: If you would like to be kept informed of future consultations please tick the box below to indicate which plans you are interested in.**

Adur Local Plan

Shoreham Harbour Regeneration Project

