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Worthing Town Hall
Chapel Road
Worthing
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Date: 5th November 2013

Our Ref: ic/0327/Lancing College

Your Ref: ALP Consultation

Dear James,

Proposals at The Sussex Pad pertaining to Shoreham Airport Draft Adur Local Plan 2013 Consultation Response

I represent Lancing College in responding to your consultation on the Draft Adur Local Plan (2013) this representation is exclusively aimed at 'A Strategy for Change and Prosperity' and the strategic allocation at New Monks Farm and Shoreham Airport. The particular emphasis of this submission relates to the proposed transport consequences of these two proposals accepting only one will progress towards adoption.

Existing Access Arrangement

The current access arrangement at the college can be seen from the following Google aerial view. It allows access to the main college grounds via Coombes Road with vehicles able access this junction from the east and the west.

Ease of access to Coombes Road from both directions is critically important to the College and any erosion of this is likely to have a negative impact on the viability of this longstanding educational facility.



The Sussex Pad

Lancing College recently acquired The Sussex Pad and proposals for a change of use of the building are with the LPA for further consideration. Some pre-application dialogue has already taken place with Mr Barnett of Adur Council and Mr Little of SDNP. Plans for the site include accommodation for students in the short term.

Monks Barn Farm - Option 2

Within the Monks Barn Farm Option (Roundabout Option 2) reference is made to a 'reconfigured junction' at the Sussex Pad. The uncertainty around precisely how this will happen is deeply concerning to my client. The indicative plan within the ALP is replicated below for ease of reference:

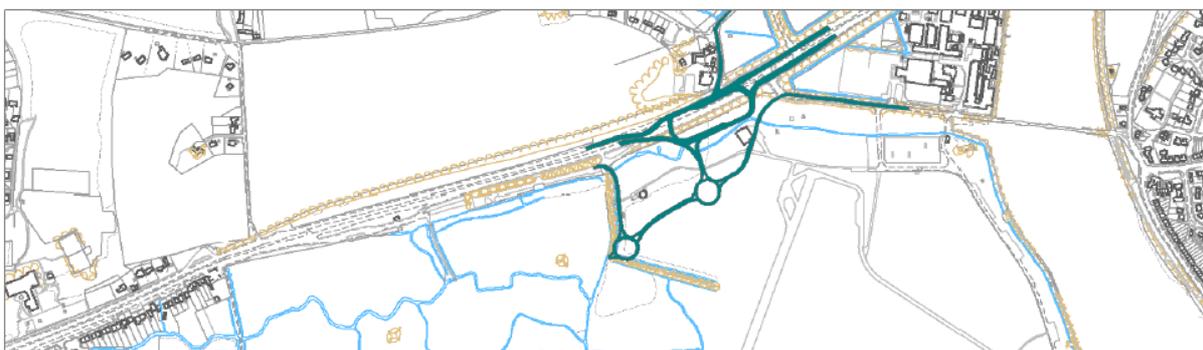
Roundabout Option 2. New Monks Farm



Should the current relative ease of access onto and out of Coombe Road be restricted in any way it will result in vehicles leaving Lancing College (and travelling west) undertaking a detour to the roundabout junction of the A27 with the A283 (to the east). This will entail, during term time, in excess of 200 additional vehicle movements at this junction unnecessarily at am and pm peak time. This additional traffic movement alone is questionable given that 'sustainable development' is seen as a 'golden thread' throughout the National Planning Policy Framework (NPPF). Quite apart from the environmental consequences of such a downgrade of this current junction arrangement the impact on the viability of the school is also of some considerable concern.

The Sussex Pad - Roundabout Option 1

Roundabout Option 1. Shoreham Airport



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With regards to the junction proposals currently out to consultation the key proposal, as far as the Sussex Pad is concerned, is replicated for ease of reference above.

Representation:

Lancing College want to make clear that the principle of enhanced access to the Shoreham Airport is not resisted and the strategic allocations in themselves, set out within the ALP, are not opposed. The highways consequences of either proposal (Option 1 or 2) are the main focus of concern. Lancing College have been given little time to respond to the consultation are understandably alarmed by the implications of either proposed highway layout. I make the following representation for further consideration on behalf of Lancing College:

Proposed Monks Barn Farm Junction (Option 2)

Lancing College strongly object to any highway layout curtailing ease of access to and from Lancing College via Coombes Road from the east and west. References within the plan to a 'reconfigured access' are of concern and if they result in any increased restriction in vehicle movement, over and above the current arrangement, my client has a genuine fear that they may impinge upon the viability of this longstanding educational facility.

Proposed Sussex Pad Junction (Option 1)

Of the two options the Sussex Pad roundabout, in principle at least, is supported by Lancing College and is a clear preference given it better maintains east/west access to the site. However, on matters of detail the following comments are made.

Noise and Disturbance: The likelihood of the more intensive use of The Drive, giving rise to unacceptable levels of noise and disturbance to The Sussex Pad and nearby residential property, has not been fully considered. For this reason the proposals are considered contrary to paragraph 123 of the NPPF which aims to '*avoid noise giving rise to significant adverse impacts*'.

Highway Safety: The Drive (east of The Sussex Pad) is currently a relatively rural cul-de-sac with several existing homes enjoying peace and quiet. Traffic to and from Lancing College is relatively high and 'East/West Access' on both sides of the junction is essential not only for my client but also for ease of access to the wider National Park.

The introduction of increased traffic, on the informal nature of The Drive, will not only materially increase inconvenience to users but potentially create greater pedestrian/vehicular conflict closer to the school grounds. Particularly during the summer months the College generate a large volume of non vehicular traffic. Any design solution must provide safe passage for pupils across the A27 at all times. Understandably pupil safety is a key priority for the college. This is covered in the text of Revised Draft Policy 7 which states:

"Access across the A27 to the South Downs National Park for pedestrians and cyclists must be retained."

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However the radical 'motorway standard' junction improvement portrayed in "*Roundabout Option 1*" seems to suggest re-opening this narrow rural lane previously deemed unsuitable for high volumes of traffic. Presumably this route was closed off at the time of forming the current dual carriageway. To now contemplate a re-opening of this route does not suggest a properly thought through design solution, is highly unsympathetic to its surroundings and contrary to good planning. The proposals are quite major and are likely to create a significant physical and visual barrier between land to the south and Lancing College and the wider National Park.

Conclusion

In this case the plan is unsound because there is genuine doubt over whether or not one of its strategic employment allocations could be delivered in the manner envisaged without harm to existing neighbouring uses. The highway proposal (Option 2) potentially results in an unacceptable impact to Lancing College 'if' east/west access on Coombes Road is curtailed in any way. Option 1 (The Sussex Pad Option) is favoured in principle but the idea of re-opening The Drive remains a genuine cause for concern.

It is strongly recommended that the development utilises the existing unchanged Sussex Pad junction. Lancing College object to revised draft policies 4 and 7 specifically in relation to the highway layout proposed. Lancing College strongly believe Coombes Road should remain the primary connection to the A27 and that this remains accessible from east and west. Its width and capacity is far greater than that of the more rustic narrow country lane in front of The Sussex Pad.

Please do keep me advised of your timetable moving forward so that I can continue to engage on behalf Lancing College.

Yours faithfully



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