

# Report for Reg.18 Consultation 2015 on Proposed Amendments to the New Monks Farm Allocation within the Proposed Submission Adur Local Plan 2014.

Reference Number	Organisation/ Company
1	Resident

Q1 - Do you think the proposed amendment regarding the number of homes is appropriate?

Yes, the number is only the higher number on the original plan.

Q2 - Do you think the new indicative location for the roundabout is appropriate?

Yes, however indicative is not enough as it does not show how all the stakeholders will be served - we need more detail.

Q3 - Do you think amending the boundary to include the existing site of Withy Patch is appropriate?

Yes, you need to deal with this area as part of the entire scheme – why did you not do this before?

Q4 - Do you think the relocated Withy Patch site is in the appropriate location?

Hmmm - It is hardly relocated - you have just removed the eastern part and put on the west end, and as it is indicative why bother - it will be subject to the land required for the roundabout?!

Q5 - Do you think showing the proposed Built Up Area Boundary as indicative is appropriate? Is there an alternative way of addressing this matter?

This is one way of doing it - an alternative, you could just say the area in hectares or whatever you use these days, and that give you scope to alter, as you say it is all down to the flood issue and what needs to be done to remove the risk. Oh, and I would be interested to see how you will do this, does anyone recall the 1993 and the worse 1994 floods, when the entire A27 was closed due to flooding, caused by heavy rain and all the chalk rivers activating on the South Downs, that flooded the entire area up to several feet/ you have just one tidal controlled outfall by the dog kennels A259, and with at least four land owners (new monks - that do a great job, the airport who react when pushed, rail track who do nothing badly, and the now Dogs Trust, who at least seem to be taking the matter on board) you have a very very weak link - rail track in the middle. May I suggest that with modern technology, and the Dutch! You could come up with an answer to the flooding issue - I am no hydrologist, but I can see several solutions.

General comments

Reference Number	Organisation/ Company
2	Albemarle (Shoreham) LLP and Longbow Investment No3 S.A.R.L.

Q1 - Do you think the proposed amendment regarding the number of homes is appropriate?

The consultation document identifies the Council's proposal to identify the New Monks Farm site for 600 homes, as opposed to the approach in the Proposed Submission Local Plan which identifies a range of between 450 and 600 homes. The consultation document identifies that the higher figure is necessary to make the development viable, and notes also that Adur has a significant need for new homes. We fully endorse this proposed change. In terms of housing delivery generally, we note that paragraph 2.22 of the Proposed Submission Local Plan (2014) confirms that, when assessed against the upper end of the Council's identified objectively assessed need for housing, the Local Plan strategy would result in a shortfall of between 1,162 and 1,312 homes. Accordingly we fully support the proposal to allocate the New Monks Farm site (Policy 5) for 600 homes, as it The consultation document identifies the Council's proposal to identify the New Monks Farm site for 600 homes, as opposed to the approach in the Proposed Submission Local Plan which identifies a range of between 450 and 600 homes. The consultation document identifies that the higher figure is necessary to make the development viable, and notes also that Adur has a significant need for new homes.

We fully endorse this proposed change.

In terms of housing delivery generally, we note that paragraph 2.22 of the Proposed Submission Local Plan (2014) confirms that, when assessed against the upper end of the Council's identified objectively assessed need for housing, the Local Plan strategy would result in a shortfall of between 1,162 and 1,312 homes.

Accordingly we fully support the proposal to allocate the New Monks Farm site (Policy 5) for 600 homes, as it would assist in reducing the planned shortfall in housing provision in the District. In terms of development viability, we similarly understand and support the logic of identifying the site for 600 homes. The Local Plan is clear that the development of the strategic sites at New Monks Farm and Shoreham Airport is critically important to the Vision for the District in the period to 2031. These adjacent sites, both of which require the delivery of a suitable access from the A27, cannot and should not be viewed in isolation, and issues of financial viability are critically important.

Representations submitted by Savills in relation to the Shoreham Airport site (November 2013) confirmed, with reference to viability work, that the land value created by the development of 15,000sqm of employment space at the Airport was not sufficient to cover the costs associated with significant improvements to the A27, or any contribution to flood defences or other infrastructure costs. Accordingly those representations confirmed that, if it was to be delivered, the proposed development at the Airport would need to be subsidised via public funds and / or the development at New Monks Farm.

The Council's proposal to confirm that the housing element of the New Monks Farm allocation will be at the top end of the previously identified range (600 homes) will maximise the quantum of housing that is delivered. In addition to assisting the Council in terms of housing delivery generally this will, importantly, assist the financial viability and, therefore, deliverability, of the inter-related allocations at New Monks Farm and Shoreham Airport which are critical to the Local Plan strategy (see below).

Q2 - Do you think the new indicative location for the roundabout is appropriate?

Yes.

The consultation document identifies that the new indicative location for a single access point from the A27, to serve both the New Monks Farm and Shoreham Airport allocations, is achievable and better serves the needs of both sites. We agree, having regard to the appropriateness of a single access in terms of the delivery of the Local Plan strategy generally, and also its suitability from a technical perspective (based upon high level input from JMP Transport Consultants). We address each issue in turn below.

Appropriateness in terms of Delivering the Local Plan Strategy.

The Local Plan identifies, as the first 'Key Issue' for the District in the period to 2031, the need to diversify the economy, safeguard employment sites and provide more opportunities for businesses to locate into or expand in Adur. Accordingly the 'Vision' for the District recognises that by 2031 new opportunities for employment will have been created, and specifically references both Shoreham Airport and New Monks Farm in this regard. The Vision notes that the delivery of these sites would benefit not only the economic prosperity of Adur but also the wider sub-region.

The sub-regional importance of these sites, particularly the Shoreham Airport site, is acknowledged by the Greater Brighton City Deal, which seeks to prioritise economic growth that would support the delivery of the Coast to Capital LEP's Growth Strategy. Its ambition is to increase GVA, the number of people employed and productivity generally. The City Deal confirms that the Government has agreed to provide certainty over, inter alia, future investment in flood defences at Shoreham Harbour and Shoreham Airport, to help to secure private sector investment to create major new Growth Centres focusing particularly on green industries, which could together provide space for 1,740 new jobs. This potential is acknowledged at paragraphs. 2.38 of the Local Plan.

Based upon the importance of these sites at both a District and sub-regional level, Local Plan Policy 2 (Spatial Strategy) identifies Shoreham Airport as a focus for new employment floorspace, and New Monks Farm as a mixed-use allocation to provide for housing, employment and community uses. More specifically Policy 7 of the Local Plan, which relates to Shoreham Airport, allocates approximately 15,000sqm of new B1 / B2/ B8 employment floorspace on the north eastern side of the Airport. The supporting text notes that the Adur Employment Land Review Update (2014) identifies that the Airport:

“...represents a key opportunity for economic development and growth as it is one of the few areas in Adur that can attract high value-added activities, capitalising on the existing business cluster and key high profile employers, such as Ricardo.”

It also recognises that new development will help support the airport function in the long-term.

Against this background it is clear that the delivery of strategic employment development at Shoreham Airport is a central and critical part of the strategy both for Adur District and the Greater Brighton area. On that basis it is essential that the Council ensures that this allocation, and the related allocation at New Monks Farm, is financially viable / deliverable.

As referenced previously, representations submitted by Savills in November 2013 identified, with reference to viability assessment work, that the proposed development at Shoreham Airport was not financially viable if it was required to fund, inter alia, significant improvements to the A27. These representations also confirmed that the Highways Agency (as then) was unlikely to allow more than one access onto the A27 in this area, and that the originally proposed access adjacent to the New Monks Farm site would require the closure or down-grading of the Sussex Pad junction, which would itself have serious and substantial negative impacts on the viability of the proposed employment development at the Airport.

Against this background we are wholly supportive of the proposed change to the Local Plan, which now proposes a single access from the A27 in the approximate location shown on the plan entitled 'Proposed Amendments to Allocation at New Monks Farm'. This single access would serve both of these key strategic sites and should be acceptable to the Highways England in technical terms (see below for detail).

In taking forward formal amendments to the Local Plan in due course, however, it is important not only that this single revised access location is advanced but also that relevant Local Plan policies clearly recognise that the viability / delivery of these strategic sites is inextricably linked. The Council, and relevant developers, must accept that to deliver these sites, not only is a single joint access from the A27 required but also that value-sharing is essential. Policies must recognise that the mixed-use development proposed at the New Monks Farm site has the potential to generate a significantly higher development value than the employment development proposed at the Airport (a development value increased further by the proposed increase to 600 homes as part of these Local Plan amendments). This higher value must be shared in order to deliver the infrastructure required to deliver both the New Monks Farm allocation and the adjacent allocation at Shoreham Airport. Without clear acceptance of these principles the deliverability of these key sites, both of which are central to the Vision for the District, will be fundamentally undermined.

Appropriateness from a Technical Perspective.

JMP Transport Consultants have considered, from a high level technical perspective, the appropriateness and deliverability of the new indicative location for a roundabout. Their conclusions, which wholly support the Council's proposals, are set out in the note and associated outline plan attached to this letter.

Q3 - Do you think amending the boundary to include the existing site of Withy Patch is appropriate?

No comment at this point in time.

Q4 - Do you think the relocated Withy Patch site is in the appropriate location?
No comment at this point in time.
Q5 - Do you think showing the proposed Built Up Area Boundary as indicative is appropriate? Is there an alternative way of addressing this matter?
No comment at this point in time.
General comments
<p>In summary, therefore, we welcome the proposed amendments to the Local Plan. However, when the Local Plan is formally amended, the Council must ensure that it overtly recognises the inter-relationship between the New Monks Farm and Shoreham Airport allocations, particularly in terms of financial viability and consequent deliverability. If you have any questions please feel free to contact me.</p> <p>Appendix re transport/ highways by JMP.</p> <p>1 Introduction.</p> <p>1.1 JMP Consultants Ltd have been commissioned to provide technical transport and highways advice for the consultation on the Proposed Amendments to the New Monks Farm allocation for the Proposed Submission Adur Local Plan 2014. The site is located to the east of Lancing and the west of Shoreham-by-Sea, directly to the south of the A27. The A27 is part of the strategic route network (SRN) managed by Highways England. 1.2 This document will focus on the changes to the proposed access and provide technical transport and highways advice supporting the proposals within the Proposed Amendments consultation.</p> <p>2 Location of access point.</p> <p>2.1 The location of the site access onto the A27 as proposed in the Proposed Submission Adur Local Plan 2014 is central to the New Monks Farm site allocation's northern boundary with the A27. An access from the A27 in this location is not well located to serve development and the Shoreham Airport site and employment allocation. Furthermore, the Proposed Submission Adur Local Plan 2014 also states that an alternative access in the form of a new roundabout at the Sussex Pad junction would be retained as a contingency access.</p> <p>2.2 Within the Proposed Amendments an indicative location of the proposed access is now shown on the eastern edge of the Monks Farm Allocation, along its shared boundary with Shoreham Airport. The feasibility of providing such an access in this location is assessed below.</p> <p>2.3 In the Proposed Submission Adur Local Plan 2014, Shoreham Airport is stated as being a growth centre and a focus for new employment floorspace (both aviation and non-aviation related) for the District, with the aim of providing approximately 15,000sqm of floorspace. Paragraph 2.77 of the document suggests that to be able to accommodate this increase in employment, a new access onto the A27 will need to be provided.</p> <p>2.4 The principle of providing an access in a location which enables one junction to serve both the New Monks Farm allocation and Shoreham Airport is supported. This would better serve the requirements of both sites in addition to other stakeholders in the area and provide highway benefits. The provision of a single access also provides the opportunity to stop up existing substandard accesses to the site and does not prejudice the aspiration of reconfiguring the Sussex Pad junction.</p> <p>3 Rationalisation of access points.</p> <p>3.1 The majority of road accidents occur at or near junctions. The rationalisation of multiple access points for a site to a single access will improve highway safety due to a reduction in conflicting movements between road users. Generally, the fewer accesses, the fewer points where vehicles are crossing the carriageway and reduced conflicts.</p> <p>3.2 Existing accesses to the sites from the A27 exist currently. These accesses are substandard and would not be suitable to accommodate development on the sites.</p> <p>3.3 A single access serving the development sites and allocations at both New Monks Farm and Shoreham Airport will be safer in highways terms than two relatively close separate accesses for each of the developments.</p> <p>3.4 The provision of one access point instead of two would also have less of a detrimental effect on the capacity of the A27 with fewer interruptions to the free flow of traffic on the main carriageway of the A27. 3.5 The provision of a</p>

single access provides the opportunity to stop up and remove existing access points which are substandard, providing a further safety benefit.

#### 4 Provision of a new access point

4.1 The form and scale of the junction has been assessed at a 'high, indicative' level. JMP Drawing ST16450-06 shows an outline of the land required to provide a new roundabout serving both the New Monks Farm allocation and Shoreham Airport in this location. This includes an estimate of land required for construction and earthworks. Assessing the design requirements for a new access junction demonstrate that it would be necessary to use land from both the Monks Farm site allocation and the Shoreham Airport site in order to achieve maximum highway benefit.

4.2 The indicative landtake outline is based on the provision of a junction designed in accordance with the Design Manual for Roads and Bridges (IDMRB) standard in TD 16-07 Geometric Design of Roundabouts. These design standards would be applied to the A27, as part of the SRN.

4.3 An access junction designed in accordance with national design standards for the strategic road network would be suitable to accommodate the vehicle movements associated with the development allocations. It is also considered at this preliminary stage that the access junction would be sufficient to accommodate the existing traffic flows on the A27, future growth noted in the DfT's A27 Corridor Feasibility Study (which also identifies highway improvements being made elsewhere on the corridor) and vehicle movement/trip generation from the two development sites.

4.4 The junction would be designed to facilitate all movements and the provision of a new access in this location would not prejudice the provision of any reconfigured access at Sussex Pad. The proposals outlined within the emerging Local Plan are to remove the traffic signal controlled junction in this location and to replace with left in, left out access arrangements (including at Old Shoreham Road).

4.5 A roundabout junction on the A27 could deliver all movement access to the Airport, effectively replacing some of the movements at the Sussex Pad junction. The left in, left out arrangement in isolation would not be suitable to accommodate existing traffic flows using Old Shoreham Road and the employment allocation at Shoreham Airport; therefore presenting further justification for an all movement roundabout junction to serve both Monks Farm allocation and Shoreham Airport.

#### 5 Conclusions

5.1 In conclusion, the proposal to move the access to the east is supported and considered beneficial in highway terms for the following reasons: It would serve allocations and future developments at both New Monks Farm and Shoreham Airport and allow for the provision of one combined access rather than two separate ones; The provision of a single access would benefit the A27 in terms of both highway safety and capacity and enable the removal of substandard existing site accesses; The roundabout access junction can be designed to avoid the relocated Withy Patch of land from Shoreham Airport is incorporated; An indicative landtake outline for a roundabout has been produced which shows a junction can be accommodated in accordance with national design standards in DMRB; and A roundabout can deliver all movement access to the Airport, reducing the demand at the Sussex Pad junction (including the aspiration to reconfigure this junction to remove the signals and provide a left in, left out arrangement – this aspiration is not prejudice by any roundabout access).

Reference Number	Organisation/ Company
3	Dalton Warner Davis LLP

Q1 - Do you think the proposed amendment regarding the number of homes is appropriate?

DWD oppose the amendment to the housing allocation and believe that the previous proposed range was more appropriate. This area has been identified for a range of land uses. There should be sufficient flexibility to enable specific applications to be determined on their own merits. The authority should not seek to rely upon 600 homes coming forward at this location and should maintain an indicative range. There is too much focus on housing delivery. It is important to also acknowledge the need to provide local employment opportunities and services and facilities for the area.

Q2 - Do you think the new indicative location for the roundabout is appropriate?

Q3 - Do you think amending the boundary to include the existing site of Withy Patch is appropriate?

Q4 - Do you think the relocated Withy Patch site is in the appropriate location?

Q5 - Do you think showing the proposed Built Up Area Boundary as indicative is appropriate? Is there an alternative way of addressing this matter?

More detailed work is required to identify the exact land take required, the apportionment of uses and the final layout. The identification of this area for a mixed use development is fully supported. However there should be sufficient flexibility to enable individual applications and uses to be considered on their own merits. It is difficult to plan and identify all potential business and development opportunities for the period of the plan.

It is believed that a wider range of potential floor space/uses should be identified. The housing figure should revert to an indicative range. There could also be potential for substantially greater than 10,000 sq m of employment generating floorspace. There should be sufficient flexibility to enable the authority to respond to opportunities that may arise during the plan period.

General comments

I would like to register to appear at any examination into the Local Plan.

Reference Number	Organisation/ Company
4	Resident

Q1 - Do you think the proposed amendment regarding the number of homes is appropriate?

Q2 - Do you think the new indicative location for the roundabout is appropriate?

Q3 - Do you think amending the boundary to include the existing site of Withy Patch is appropriate?

Q4 - Do you think the relocated Withy Patch site is in the appropriate location?

Q5 - Do you think showing the proposed Built Up Area Boundary as indicative is appropriate? Is there an alternative way of addressing this matter?

General comments

**ACCESS TO SITE**

Has anyone involved with these proposals ever driven along the A27 in the morning or evening rush hours, or even listened to the traffic reports? There is regular daily congestion with tailbacks of more than a mile along this stretch.

Any proposals for feeding yet more traffic into this stretch will bring about total gridlock. These plans should not even be considered until such time as the existing traffic chaos has been sorted out, if that ever occurs.

As a general point, we are constantly being fed the line that we 'need' more housing in this area. We do NOT need more housing in an area where the local infrastructure (roads, water, sewage, hospitals) is barely coping with the existing population.

What IS needed is plans by central government to relocate jobs and housing to less populous areas of the UK where the economy needs the boost. We need our Local Councillors to stop spinelessly accepting Government pressure to concrete over the South East, and instead to stand up for the interests of the residents and to maintain the few urban open spaces left to us.

Reference Number	Organisation/ Company
5	Ricardo plc

Q1 - Do you think the proposed amendment regarding the number of homes is appropriate?

The need for the 600 homes at NMF to help meet the strategically assessed housing need in the area is supported subject to detailed plans and appropriate drainage mitigation.

Q2 - Do you think the new indicative location for the roundabout is appropriate?

Welcome the proposed roundabout location to unlock key regeneration and development opportunities at the airport as well as NMF.

Q3 - Do you think amending the boundary to include the existing site of Withy Patch is appropriate?

Q4 - Do you think the relocated Withy Patch site is in the appropriate location?

A flexible approach to Withy Patch is supported.

Q5 - Do you think showing the proposed Built Up Area Boundary as indicative is appropriate? Is there an alternative way of addressing this matter?

General comments

The plan should be focused on a junction improvement and not rule out a grade separated junction, if the strategic road network requires this.

Additional employment space is very welcome and we encourage a range of employment types consistent with City Deal and Local Growth Fund pipeline projects.

The sequencing of activities is critical, taking note of the need to accelerate the A27 improvements, flood defence construction, Environmental Growth Hub (City Deal) –infrastructure is essential in advance of the housing and employment space – a project plan for this should be developed in parallel with the examination phase.

We welcome a country park as a local amenity and as addition to the tourist economy.

We look forward to detailed plans for sustainable transport (low carbon emissions at point of delivery) along the route and to connect the developments to stations, bus and cycle networks.

Reference Number	Organisation/ Company
6	Adur and Worthing Business Partnership

Q1 - Do you think the proposed amendment regarding the number of homes is appropriate?

The need for the 600 homes at NMF to help meet the strategically assessed housing need in the area is supported subject to detailed plans and appropriate drainage mitigation.

Q2 - Do you think the new indicative location for the roundabout is appropriate?

Welcome the proposed roundabout location to unlock key regeneration and development opportunities at the airport as well as NMF.

Q3 - Do you think amending the boundary to include the existing site of Withy Patch is appropriate?

Q4 - Do you think the relocated Withy Patch site is in the appropriate location?

A flexible approach to Withy Patch is supported.

Q5 - Do you think showing the proposed Built Up Area Boundary as indicative is appropriate? Is there an alternative way of addressing this matter?

General comments

The plan should be focused on a junction improvement and not rule out a grade separated junction, if the strategic road network requires this.

Additional employment space is very welcome and we encourage a range of employment types consistent with City Deal and Local Growth Fund pipeline projects.

The sequencing of activities is critical, taking note of the need to accelerate the A27 improvements, flood defence construction, Environmental Growth Hub (City Deal) –infrastructure is essential in advance of the housing and employment space – a project plan for this should be developed in parallel with the examination phase.

We welcome a country park as a local amenity and as addition to the tourist economy.

We look forward to detailed plans for sustainable transport (low carbon emissions at point of delivery) along the route and to connect the developments to stations, bus and cycle networks.

Reference Number	Organisation/ Company
7	Sussex Wildlife Trust
Q1 - Do you think the proposed amendment regarding the number of homes is appropriate?	
<p>No, the Sussex Wildlife Trust disagrees with this amendment. Policy 5 in the Proposed Submission Adur Local Plan 2014 states ‘Delivery of the upper end of this range is subject to demonstration to the satisfaction of the Local Planning Authority that there is no adverse impact on biodiversity and the landscape’. There is no evidence presented as part of this consultation to suggest that no adverse impact on biodiversity has been demonstrated.</p> <p>The National Planning Policy Framework (NPPF) is clear that there are three dimensions to sustainable development: economic, social and environmental and that these roles are mutually dependent with no one dimension taking precedent over the other two (paragraphs 7 and 8). It is not acceptable to disregard the potential environmental impact of this allocation due to concerns over viability.</p> <p>In particular the Trust is concerned about the impact of the higher level of development on the hydrology of the site and as such, the riparian habitats. No evidence has been presented to suggest that these impacts can be adequately avoided or mitigated. We advocate a more joined up approach to ensure no adverse impacts and overall net gains to nature (NPPF paragraphs 9 and 109), particularly in relation to natural flood defences.</p> <p>Given the biodiversity and flood risk issues in this area, the Sussex Wildlife Trust has continued concern over this allocation. It represents further erosion of the green gap between Shoreham and Lancing, and we remain unconvinced that development in this green gap will contribute to the gain in natural capital which is vital for sustainable growth in West Sussex.</p>	
Q2 - Do you think the new indicative location for the roundabout is appropriate?	
Q3 - Do you think amending the boundary to include the existing site of Withy Patch is appropriate?	
Q4 - Do you think the relocated Withy Patch site is in the appropriate location?	
Q5 - Do you think showing the proposed Built Up Area Boundary as indicative is appropriate? Is there an alternative way of addressing this matter?	
General comments	

Reference Number	Organisation/ Company
8	Environment Agency
Q1 - Do you think the proposed amendment regarding the number of homes is appropriate?	
Q2 - Do you think the new indicative location for the roundabout is appropriate?	
Q3 - Do you think amending the boundary to include the existing site of Withy Patch is appropriate?	
Q4 - Do you think the relocated Withy Patch site is in the appropriate location?	
<p>As discussed we have reviewed the proposed amendments to the New Monks Farm allocation within the Proposed Submission Adur Local Plan 2014 and would wish to make the following comments in relation to the proposals for Withy Patch.</p> <p>The Proposed Submission Adur Local Plan 2014 highlighted the requirement for land raising of the current Withy Patch site to take it out of Flood Zone 3. This would be needed to enable future expansion.</p> <p>The Environment Agency would have no concerns in principle with the potential relocation of Withy Patch site providing the flood risk is like for like, or less, and that there is a betterment in terms of flood risk management. Providing there are no additional pitches proposed then we would not have concerns to the relocation being on a slightly larger site. For any future expansion, however, land raising would need to have occurred prior to any planning application for additional pitches. The planning application would need to include the justification that the site should no longer be considered as Flood Zone 3 by providing relevant topographical surveys or other information as required.</p> <p>We would be happy to review any specific wording regarding Withy Patch.</p>	
Q5 - Do you think showing the proposed Built Up Area Boundary as indicative is appropriate? Is there an alternative way of addressing this matter?	
General comments	

Reference Number	Organisation/ Company
9	The Community Stadium Ltd
Q1 - Do you think the proposed amendment regarding the number of homes is appropriate?	
<p>2.1 Providing an upper limit rather than a range is appropriate given the onus on the Council to 'boost significantly the supply of housing' (Paragraph 47 of the National Planning Policy Framework) and to meet the development needs of their area in line with the presumption in favour of sustainable development (Paragraph 14 of the NPPF).</p> <p>2.2 It is noted that that Council's Objectively Assessed Housing Needs Study (OAHNS) published in August 2015 identifies that there is a need for 5,280 homes over the Adur Local Plan period (291 dwellings per annum). As a result of the various constraints to development across the District the most recent version of the draft Local Plan (2014) proposes that only 3,488 – 3,638 homes will be provided, this is some way short of the need identified by the OAHNS.</p> <p>2.3 Consequently, it is clearly important that each allocation within Adur seeks to make the best use of land to ensure that there is no further shortfall against the need identified by the OAHNS. The proposed amendment is considered necessary to ensure that the ADLP is positively prepared in accordance with the NPPF.</p> <p>2.4 Furthermore, the New Monks Farm allocation will make up 17% of the Council's total housing provision over the plan period and, therefore, it is vitally important that the allocation is viable and deliverable.</p> <p>2.5 Even with this clarification in terms of housing numbers our Client considers that the proposed allocation is not currently viable without additional flexibility in respect of the commercial/employment provision. The delivery of the allocation will require significant investment in infrastructure, principally in respect of the proposed roundabout from the A27 but also in respect of flood mitigation works. Therefore, it is considered that the 'appropriate employment provision' should be given a very broad definition subject to any such provision complying with the requirements of the sequential approach set out within Section 2 of the NPPF.</p> <p>2.6 Policy 4 of the ADLP currently states that a total of 41,000 m2 of land will be allocated for appropriate employment generating uses in Adur up to 2031 at locations including 10,000 m2 at New Monks Farm.</p> <p>2.7 It is considered that setting a maximum limit on the amount of employment generating uses at New Monks Farm is too restrictive and not positively prepared. In order that the Council can satisfy themselves that at least 10,000 m2 of employment generating space will be provided at New Monks Farm this level should be referred to as a minimum. Clearly, should any future developer seek to provide in addition to this level of floorspace, such provision should be treated positively, provided that it complies with other policies within the ADLP, as well as guidance provided within the NPPF.</p> <p>2.8 From the viability appraisals carried out by the respondent, it is our view that the above amendments to the Local Plan are essential to make the New Monks Farm allocation viable and deliverable. If the amendments requested above are not made there is a significant risk that the proposed allocation is not viable, which would put the Council in continuing danger of failing to make provision for 5 years of housing land supply.</p>	
Q2 - Do you think the new indicative location for the roundabout is appropriate?	
<p>3.1 The proposed location of the roundabout is broadly supported, being located between both the main allocations in this area. Furthermore, we believe the indicative location will also support the development and access aspirations of important existing local employers and education establishments including: Lancing College, Ricardo and Northbrook College.</p> <p>3.2 However, it should be made clear within the relevant policies that this is an indicative location that may change subject to detailed highway design considerations.</p> <p>3.3 Furthermore, the location requires co-operation of land owners to the east. Should an agreement not be reached the policies should be sufficiently flexible so as to allow the roundabout to be positioned further west. Such a revision would ensure delivery of this important allocation.</p>	
Q3 - Do you think amending the boundary to include the existing site of Withy Patch is appropriate?	
4.1 This approach is considered appropriate.	
Q4 - Do you think the relocated Withy Patch site is in the appropriate location?	
5.1 This is appropriate, provided the location is indicative in line with any requirement to adjust the location of the	

proposed roundabout.
Q5 - Do you think showing the proposed Built Up Area Boundary as indicative is appropriate? Is there an alternative way of addressing this matter?
<p>6.1 We agree that this approach is appropriate, as it provides some flexibility to address the many functions that land can perform. This is referred to at Paragraph 17 (Core Planning Principles) of the NPPF which states that Local Planning Authorities should promote mixed use developments recognising the different roles that both urban and rural land can perform (such as for wildlife, recreation or flood risk mitigation).</p> <p>6.2 An indicative built up area boundary will ensure that land is used for its best purpose, i.e. in this case it may mean that areas of land within the indicative boundary would be best used for flood mitigation purposes, whilst land outside of the indicative boundary may be acceptable for residential purposes. Paragraph 157 of the NPPF goes on to state that one of the purposes of Local Plans is to allocate sites to promote development and the flexible use of land. It is considered that the proposed amendment is therefore consistent with the NPPF.</p> <p>6.3 In addition to the residential and commercial development proposed in the Local Plan, TCSL/Brighton &amp; Hove Albion Football Club may have a requirement to extend their training ground eastwards.</p> <p>6.4 Given the above, it is considered that the built up area boundary along the eastern side of the existing training ground should be shown as indicative. This would then allow for any future requirement to expand the training ground facilities eastwards.</p> <p>6.5 Alternatively, the land immediately east of the training ground could be subject to a separate allocation providing for expansion, subject to addressing any landscape, ecological or flood risk issues.</p> <p>6.6 Paragraph 21 of the NPPF indicates that Local Plan policies should be flexible to accommodate needs not anticipated and to allow a rapid response to changes in economic circumstances. It is our view that the above amendment would demonstrate a proactive approach to meeting the needs of a significant local employer, helping to achieve economic growth (Paragraph 20 of the NPPF) whilst reinforcing the positive community benefits delivered by the training ground.</p>

General comments
<p>1.1 This consultation response is written by DMH Stallard on behalf of The Community Stadium Limited (TCSL) in respect of the 'Proposed Amendments to the New Monks Farm Allocation within the Proposed Submission Adur Local Plan 2014'.</p> <p>1.2 The Community Stadium Limited have an interest in this allocation as a significant landowner and employer in the local area.</p>

Reference Number	Organisation/ Company
10	West Sussex County Council - Planning and Transport Policy Team - Strategic Planning
Q1 - Do you think the proposed amendment regarding the number of homes is appropriate?	
Q2 - Do you think the new indicative location for the roundabout is appropriate?	
Q3 - Do you think amending the boundary to include the existing site of Withy Patch is appropriate?	
Q4 - Do you think the relocated Withy Patch site is in the appropriate location?	
Q5 - Do you think showing the proposed Built Up Area Boundary as indicative is appropriate? Is there an alternative way of addressing this matter?	
General comments	
<p>Please find below officer level comments upon the Adur Local Plan Focussed Amendments Consultation on two areas of transport and flood risk.</p> <p>We understand that there will be a further Regulation 19 stage of representations on the Local Plan which we will have an opportunity to comment on in due course, including policy wording amendments as well as evidence base documents.</p> <p>Transport</p> <p>West Sussex County Council supported the additional transport work undertaken, as suggested in previous comments, as well as the further work by Highways England regarding mitigation and improvements to the A27. The County Council has worked collaboratively to inform the Adur Local Plan on the basis of a technical assessment of the work carried out and supports its conclusions. The transport work provides confidence that the package of local transport infrastructure improvements and smarter choices measures (or a similar package of measures) is likely to provide sufficient mitigation so that any residual cumulative impacts would not be severe. This is the key test imposed by the NPPF.</p> <p>The County Council will continue to engage with Adur District Council and Highways England through the preparation of the Local Plan and the planning and implementation of mitigation and improvement measures on the A27.</p> <p>Flood risk</p> <p>WSCC as the Lead Local Flood Authority (LLFA) support the Vision and Objectives relating to flood risk set out in the Draft Local Plan and will continue to work with the Local Planning Authority following earlier detailed comments made in the preparation of the Local Plan.</p> <p>WSCC has advised that, as shown in the Adur Strategic Flood Risk Assessment, some of the allocated development sites are within areas of known flood risk. As required by the National Planning Policy Framework, the allocated sites must meet the Sequential Test and Parts 1 and 2 of the Exception Test. We set out previously that the LPA appeared to be satisfied that existing flood risk issues at all allocated sites, including the New Monks Farm strategic site, could be technically and practically mitigated at the 450 or 600 housing level. WSCC reviewed the submitted evidence and found no reason why the sites would not meet the Sequential and Exception Tests as set out. WSCC will continue to work with and advise the LPA on the site specific flood risk assessment elements of the exceptions tests for all allocated sites.</p> <p>It is acknowledged that the Adur Local Plan has been developed without knowledge of the outcomes of the recently published (October 2015) Lancing Surface Water Management Plan. The SWMP covers a wider area than the proposed strategic sites in the Local Plan and gives a better understanding of local flood mechanisms and provides technical recommendations for local flood risk management. The SWMP is important evidence based document and should feed into the consideration of any planning applications (and possible planning conditions) for sites allocated within the Local Plan in this area. It is unlikely to affect the sequential or exceptions tests undertaken as part of the Local Plan process, however understand that these are being updated following publication of the SWMP and will await to see and comment on this further work. We would also welcome reference to the SWMP in the policy to ensure it is appropriately considered and taken into account when planning for the site.</p> <p>Any new development should leave space for suitable and adequate drainage arrangements within the boundaries of the site, follow the appropriate drainage hierarchy as set out in the new CIRIA SuDS Manual (C753) and not increase</p>	

off site flood risk.

All technical evidence relating to flood risk for the allocation of sites within the Local Plan should be considered and Published for Submission of the Local Plan.

Reference Number	Organisation/ Company
11	Resident

Q1 - Do you think the proposed amendment regarding the number of homes is appropriate?

Q2 - Do you think the new indicative location for the roundabout is appropriate?

Q3 - Do you think amending the boundary to include the existing site of Withy Patch is appropriate?

Q4 - Do you think the relocated Withy Patch site is in the appropriate location?

Q5 - Do you think showing the proposed Built Up Area Boundary as indicative is appropriate? Is there an alternative way of addressing this matter?

General comments

Having read the new local plan for the new Monks Farm area I have a few grave concerns. The area is a flood plain but also a soak away preventing other areas flooding. I live in North Farm road so building on that land could not just cause flooding to the new houses but also our property. Global warming is real. You only have to look at the horrendous photos in the news of Cumbria and much of the North of England to see flooding is going to be a real concern in our future. Building on flood plains is dangerous and stupid. Other concerns. The current primary schools in the area are at capacity with no room to expand. The increased traffic on already over stretched roads of Grinstead lane and A27. Lack of GP provision. There are currently 57 unfilled GP places in Sussex and Surrey so even if the housing development incorporated a GP surgery it would be very difficult to staff leaving more pressure on already stretched existing services.

Reference Number	Organisation/ Company
12	Resident

Q1 - Do you think the proposed amendment regarding the number of homes is appropriate?

Answer 1: No, I do not think that the proposed amendment regarding the number of homes is appropriate. My reasons are set out below:

1) I would urge the Planning Committee to read very carefully the Surface Water Management Plan for Lancing by CH2MHill that was commissioned by West Sussex County Council and published this year. The metaled roads and roof run off will very quickly overwhelm the small amount of remaining flood plain even if the foundations of roads, houses etc. do not penetrate the Chalk.

2) This area is flood plain therefore, by definition; groundwater levels are always relatively high. In periods of extreme rainfall, emergence of groundwater from the Chalk has already been shown to occur.

3) Reference to 'north' and 'south' floodplains is inaccurate and misleading. For environmental purposes the area is one single unit. Therefore, what happens north of the railway line will affect the area to the south. Adur District Council should be aware that although this southern area has been omitted from the current Development Plan, any extra water caused by building at New Monks Farm will cause additional strain on the undeveloped land immediately north and west of West Beach Estate putting all the homes south of the railway at potential risk of flooding.

The recent extreme flooding in the North of England and in the South West last year should give all planning authorities a wakeup call about the inadvisability of building on floodplains. We are not immune from floods, as experience of recent years has shown, but our best protection is the maintenance of the natural undeveloped area where plants and trees can absorb much of the precipitation that we receive. Adur D.C. should be preserving as much of this kind of land as still remains as part of its flood defences to protect those residents who already live on and around the floodplain.

Q2 - Do you think the new indicative location for the roundabout is appropriate?

As I am an Environmental Scientist by profession, I do not feel competent to answer questions relating to road layouts. The expansion of the Travellers Site at Withy Patch should be considered separately from New Monks Farm. The Environment Agency has already opposed the extension of the current site at Withy Patch.

Questions 2,3,4,5: These do not arise if the development at New Monks Farm is not pursued.

Q3 - Do you think amending the boundary to include the existing site of Withy Patch is appropriate?

The expansion of the Travellers Site at Withy Patch should be considered separately from New Monks Farm. The Environment Agency has already opposed the extension of the current site at Withy Patch.

Questions 2,3,4,5: These do not arise if the development at New Monks Farm is not pursued.

Q4 - Do you think the relocated Withy Patch site is in the appropriate location?

Questions 2,3,4,5: These do not arise if the development at New Monks Farm is not pursued.

Q5 - Do you think showing the proposed Built Up Area Boundary as indicative is appropriate? Is there an alternative way of addressing this matter?

Questions 2,3,4,5: These do not arise if the development at New Monks Farm is not pursued.

General comments

Reference Number	Organisation/ Company
13	Resident

Q1 - Do you think the proposed amendment regarding the number of homes is appropriate?

No it is not. The land is a flood plain and NO houses should be built there. Look at what is happening in the North of the country right now. The same will happen wherever you build on flood plains or near rivers.

Q2 - Do you think the new indicative location for the roundabout is appropriate?

No. The A27 is already over-stretched as it is. Direct even more traffic on to it and you will eventually have to deal with a total gridlock. And remember it too floods on a regular basis.

Q3 - Do you think amending the boundary to include the existing site of Withy Patch is appropriate?

No - see replies to Q1&2

Q4 - Do you think the relocated Withy Patch site is in the appropriate location?

No - see replies to Q1&2

Q5 - Do you think showing the proposed Built Up Area Boundary as indicative is appropriate? Is there an alternative way of addressing this matter?

Irrelevant - see replies to Q1&2

General comments

There must be an alternative location to build houses. The golf course site? Or are you all members?

I also think announcing these proposed changes over Christmas & asking for comments by 4th January is a dreadful way to treat the people who will be massively affected by all this. Shame on you.

Reference Number	Organisation/ Company
14	Resident

Q1 - Do you think the proposed amendment regarding the number of homes is appropriate?

Q2 - Do you think the new indicative location for the roundabout is appropriate?

Q3 - Do you think amending the boundary to include the existing site of Withy Patch is appropriate?

Q4 - Do you think the relocated Withy Patch site is in the appropriate location?

Q5 - Do you think showing the proposed Built Up Area Boundary as indicative is appropriate? Is there an alternative way of addressing this matter?

General comments

With the ever increasing news of flooding due to extreme weather conditions, why oh why do all local authorities still even consider allowing new housing on any flood plain. Even spending huge sums on raising flood banks cannot guarantee that the banks will not breach. Just because the land looks pretty and it's nice to be near water, any water meadows, salt marshes or simple flood zone is just asking for trouble.

The local Plan for West Sussex should be looking towards the weald and north of the county where there are vast tracts of usable land.

Reference Number	Organisation/ Company
15	Resident

Q1 - Do you think the proposed amendment regarding the number of homes is appropriate?

Q2 - Do you think the new indicative location for the roundabout is appropriate?

Q3 - Do you think amending the boundary to include the existing site of Withy Patch is appropriate?

Q4 - Do you think the relocated Withy Patch site is in the appropriate location?

Q5 - Do you think showing the proposed Built Up Area Boundary as indicative is appropriate? Is there an alternative way of addressing this matter?

General comments

I would like to make a comment on the proposed amendment to the New Monks Farm allocation within the proposed Adur local plan.

The idea of increasing the number of properties on a potential flood plain is stupid.

The environment Agency and the Highways Authority have not managed to control the water coming off the downs onto the A27.

Since the development of the Albion training ground the water level to the south of the railway line has increased causing significant water table levels.

Any major development to the Monks Farm area will have very significant flood risks to the West Beach area and surrounding areas.

You cannot have missed the major flooding problems experienced in the north of England where the floods plains have been developed.

I believe that any council that allows any development on flood plains should be held totally responsible if any damage occurs to property as a result of flooding.

Reference Number	Organisation/ Company
16	Resident

Q1 - Do you think the proposed amendment regarding the number of homes is appropriate?

Q2 - Do you think the new indicative location for the roundabout is appropriate?

Q3 - Do you think amending the boundary to include the existing site of Withy Patch is appropriate?

Q4 - Do you think the relocated Withy Patch site is in the appropriate location?

Q5 - Do you think showing the proposed Built Up Area Boundary as indicative is appropriate? Is there an alternative way of addressing this matter?

General comments

I wish to put in my objection on the planning for up to 600 houses on Monks Farm. I appreciate Adur council has to find somewhere to build new housing but building on a known flood plain is just madness!!! You only have to look what is happening up North. I live in Shadwells Road so am very worried about this not just about the flooding but also the infrastructure in this area. The roads round here are very narrow and busy at it is. Buses only run one an hour (none on Sundays and bank holidays) and schools are running at full capacity. I believe there needs to be a full rethink on this.

Reference Number	Organisation/ Company
17	WSCC Councillor for North Lancing and Sompting
Q1 - Do you think the proposed amendment regarding the number of homes is appropriate?	
Q2 - Do you think the new indicative location for the roundabout is appropriate?	
Q3 - Do you think amending the boundary to include the existing site of Withy Patch is appropriate?	
Q4 - Do you think the relocated Withy Patch site is in the appropriate location?	
Q5 - Do you think showing the proposed Built Up Area Boundary as indicative is appropriate? Is there an alternative way of addressing this matter?	
General comments	
<p>Please accept my submission of comments in relation to the Adur District Local plan for your consideration and possible acceptance, my submission document have been based on an awareness of my residence within Lancing over many years.</p> <p>I strongly urge that serious consideration is given to my submission to enhance Lancing and to bring about the Village we can be proud of.</p> <p>Lancing shopping centre is in serious decline at present and is in need of urgent major investment if it continues in its present condition we shall see more shops closing and the high street being abandoned.</p> <p>Recent major flooding across vast swathes of the UK have brought about a new awareness of the ever increasing threat of flooding to the south coastal strip, in particular the low lying land south of the downs between Lancing and its boundaries with Worthing and Shoreham's river Adur, these have experienced serious flooding from surface water.</p> <p>Over recent years we have witnessed persistent flooding in large areas of North East Lancing, Manor Close, Manor Way, and Grinstead Lane, areas, likewise in the Sompting West Street / Church Lane have had serious levels of street flooding .</p> <p>Both these areas have low lying land to the south and suffer high volumes of run off from the Southdowns.</p> <p>My concerns in respect of building in excess of 1000 more homes along with the resultant infrastructure will in my opinion exacerbate the potential of serious flooding.</p> <p>(a) To the new proposed development.</p> <p>(b) Result in major water displacement bringing misery of flooding to existing homes, and their families, added to this the inability to insure their homes against flooding.</p> <p>I ask our planners to take notice of the CM2MH hill study detailing the fragility of the drainage in the Lancing / Shoreham Gap where some 600 homes are planned along with the resultant infrastructure.</p> <p>I would also add that a very similar situation would apply to land south of West Street Sompting again bringing water displacement and possible serious flooding to existing homes in the immediate vicinity.</p> <p>It is my considered opinion that additional development must be met with factual, and a practical approach to the ever increasing threat of serious coastal flooding.</p> <p>With all the foregoing concerns taken into account it is imperative to consider the following items.</p> <ol style="list-style-type: none"> <li>1. How additional housing will undoubtedly impact on our roads and infrastructure, especially the overburdened A27.</li> <li>2. An additional 1000 homes will give need for up to 250 additional primary and secondary school places.</li> <li>3. Hospital &amp; doctors facilities are already stretched to maximum capacity.</li> <li>4. The existing Youth and leisure activities in Lancing and Sompting area would not be adequate to meet the higher</li> </ol>	

demand.

I would ask that further consideration is given to the following issues which are desperately needed and should be included in our local plan.

A cycle/foot way route from St Pauls Avenue, Sompting, to Pages Lane, East Worthing, is something I have pressed for over recent years and would be a great asset to the area.

Lancing Village looks very tired and unkempt, minor improvement are beginning to make a change but more needs to be done with greater investment, such as we have seen in Shoreham over recent years, we need to look at the vibrant town of Rustington as an example, for what could be achieved in Lancing.

Lancing has very poor village toilet facilities, these need replacing.

Lancing Village parking needs to be free to encourage visitors and residents to shop here, with extended parking times on street parking areas.

Lancing & Sompting housing estates suffer from serious parking problems, most compound garages are used for storage these need to be used for parking and the compounds arranged for additional parking where possible.

Mini roundabouts are needed at the following junctions Grinstead Lane / Crabtree Lane, also Western Road North junction with West Street and Cokeham Road Sompting.

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Reference Number	Organisation/ Company
18	WSSC Councillor for Lancing

Q1 - Do you think the proposed amendment regarding the number of homes is appropriate?

Response to Adur District Council re: Adur Plan Consultation.

Many Lancing residents have been approaching me recently with grave concerns, relating to this consultation, which now confirms that the higher number of 600 homes (not 450) is to be proposed on the New Monks Farm allocation, together with the inevitable associated infrastructure for community centre, school, 10,000sqm of business space and new road access.

Residents are obviously concerned that a roundabout along the Lancing stretch of the A27 will create a further serious impediment to traffic flows on this already over-burdened dual-carriageway. This is totally contrary to the upgrade plan for this major trunk road and will affect their lives in many ways, including difficulties with access to and from existing local roads.

But the overriding concern is that 600 new homes with associated infrastructure will create dire flooding consequences for the area. The fragility of the drainage in the whole of the Lancing Gap is now extremely well documented within the CH2MHill study commissioned by West Sussex County Council. It points out the capacity limitations of the ditch network and that no matter what measures are taken - in extreme wet weather - drainage problems cannot be mitigated. Essentially, Lancing is vulnerable to flooding from multiple causes including surface water, groundwater and sewer flooding, all exacerbated by the underlying capacity constraints of the Lancing Brooks.

After the two recent winters events (2012/13 & 2013/14) and the flooding history of the area over many decades, Adur District Council has so far failed to inform the public how it is planning to make the surface water drainage sustainable with no third party flood risk to existing properties. Furthermore, how will ADC ensure, as required by the National Policy Planning Framework, an improvement to this requirement for the lifetime of the proposed development? The same applies to the massive increase in foul waste to be drained from the site.

Guidelines issued by the NPPF clearly state that: "It must be demonstrated that a development provides wider sustainability benefits to the community that outweigh flood risk, informed by a Strategic Flood Risk Assessment where one has been prepared."

Hitherto, residents see no evidence that ADC is showing any regard to the flood risks highlighted so comprehensively by CH2MHill.

NPPF guidelines further include that: "A site-specific flood risk assessment must demonstrate that a development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall."

Until ADC can demonstrate that full regard is being shown for the content of the CH2MHill findings and that any development plans for New Monks Farm include specific, detailed evidence that they will not increase flood risk elsewhere, then due diligence for the community wellbeing will not have been served, leaving a potential blight on homes, i.e. uninsurable and unsellable properties.

It would be naïve and negligent of ADC if this were left to the development application stage. If it cannot demonstrate robust sustainability now in its management and mitigation of flood risk – then the New Monks Farm allocation must be withdrawn from the Adur Local Plan.

Q2 - Do you think the new indicative location for the roundabout is appropriate?

Q3 - Do you think amending the boundary to include the existing site of Withy Patch is appropriate?

Q4 - Do you think the relocated Withy Patch site is in the appropriate location?

Q5 - Do you think showing the proposed Built Up Area Boundary as indicative is appropriate? Is there an alternative way of addressing this matter?

General comments

Reference Number	Organisation/ Company
19	Resident

Q1 - Do you think the proposed amendment regarding the number of homes is appropriate?

Re- Proposed Changes:

600 homes on land that is a flood plain intersected with numerous dykes (drains) illustrated on the maps. Are the homes to be built on stilts? It is known that the garage at the entrance to the New Monks Farm area is built on rafters as are some of the Airport buildings. Flooding is inevitable. Do we learn nothing from the flooding in the Lewes area, South Lancing in recent years and horribly topical, in the north of England and Scotland in the last month? Once a house has been flooded it cannot be insured or sold on, is this what we are asking first-time buyers to waste their money on?

600 homes will also generate a vast amount of extra traffic onto the A27 which cannot cope now during the busiest times of the day when traffic is at a standstill exactly at the point of the proposed roundabout.

There are three Medieval Salt Works within this area which need protection.

I see that the previous proposal of a '10,000 sqm employment generating floorspace' is now not mentioned but I understand it is still in the 'pipeline'. Even more huge amounts of traffic onto the A27 from e.g. Ikea.

Q2 - Do you think the new indicative location for the roundabout is appropriate?

Re- Proposed Changes:

A new roundabout. It is not very clear where this will be. Such a roundabout will take up a large area of land. One central roundabout to cope with all the traffic from the new estate, Lancing College, the Airport and Ricardo's and another less than 0.5 mile at North Lancing. There is no possibility that the A27 could be viable.

Q3 - Do you think amending the boundary to include the existing site of Withy Patch is appropriate?

Q4 - Do you think the relocated Withy Patch site is in the appropriate location?

Q5 - Do you think showing the proposed Built Up Area Boundary as indicative is appropriate? Is there an alternative way of addressing this matter?

General comments

My first point is that the Consultation was to run between 9th Dec.2015 - 4th Jan. 2016, probably the busiest time of the year for anyone, when a lot of people are away from home, and a time when the Council Offices/Officers were not open to the public for questions to be answered. It seems to me the council is hoping very few people will have had time to read and digest this 'Consultation' document which is going to affect so many lives.

Reference Number	Organisation/ Company
20	Shoreham Airport Consultative Committee
Q1 - Do you think the proposed amendment regarding the number of homes is appropriate?	
Q2 - Do you think the new indicative location for the roundabout is appropriate?	
<p>Welcome the proposed roundabout location to unlock key regeneration and development opportunities at the airport as well as NMF.</p> <p>The plan should be focused on a junction improvement and not rule out a grade separated junction, if the strategic road network requires this.</p>	
Q3 - Do you think amending the boundary to include the existing site of Withy Patch is appropriate?	
Q4 - Do you think the relocated Withy Patch site is in the appropriate location?	
A flexible approach to Withy Patch is supported.	
Q5 - Do you think showing the proposed Built Up Area Boundary as indicative is appropriate? Is there an alternative way of addressing this matter?	
General comments	
<p>Additional employment space is very welcome and we encourage a range of employment types consistent with City Deal and Local Growth Fund pipeline projects.</p> <p>The sequencing of activities is critical, taking note of the need to accelerate the A27 improvements, flood defence construction, Environmental Growth Hub (City Deal) – infrastructure is essential in advance of the housing and employment space – a project plan for this should be developed in parallel with the examination phase.</p> <p>We welcome a country park as a local amenity and as addition to the tourist economy.</p> <p>We look forward to detailed plans for sustainable transport (low carbon emissions at point of delivery) along the route and to connect the developments to stations, bus and cycle networks.</p>	

Reference Number	Organisation/ Company
21	CPRE Sussex Countryside Trust. Campaign to protect Rural England, Sussex Branch CIO

Q1 - Do you think the proposed amendment regarding the number of homes is appropriate?

Q2 - Do you think the new indicative location for the roundabout is appropriate?

The A27 Roundabout

The A27 Lancing stretch is already vulnerable to surface water flooding. With another substantial increase in road area, this problem can only be exacerbated. Further housing at the New Monks Farm site will add road users to the highway. An additional roundabout will add further delays to already slow journey times. How will this proposal affect government plans to upgrade the A27?

Q3 - Do you think amending the boundary to include the existing site of Withy Patch is appropriate?

Q4 - Do you think the relocated Withy Patch site is in the appropriate location?

Traveller Site Relocation

How will surface water runoff be managed, bearing in mind all the issues of drainage covered by the above reports and in the above comments?

Q5 - Do you think showing the proposed Built Up Area Boundary as indicative is appropriate? Is there an alternative way of addressing this matter?

General comments

This letter is the formal response of the Campaign to Protect Rural England Sussex Branch (CPRE Sussex) to the consultation for the proposed amendments to the New Monks Farm allocation in the emerging Adur Local Plan 2014. CPRE Sussex works to promote the beauty, tranquillity and diversity of the Sussex countryside by encouraging the sustainable use of land and other natural resources in town and country. We encourage appropriate and sustainable land use, farming, woodland and biodiversity policies and practice to improve the well-being of rural communities. It is our position that local planning authorities should seek to ensure that the negative impacts of development on the countryside, both direct and indirect, are kept to a minimum and that development is sustainable in accordance with national planning policy.

New Monks Farm Proposed Allocation.

Firstly, we would like to draw your attention to our comments as part of the 2014 Local Plan consultation for this site relating to flood risk. We do not believe that the new proposal addresses these comments, which were based on the findings of a hydrology study by consultants Ambiental – see page 23 item 6 (link below).

[Http://www.adur-worthing.gov.uk/media/media,132569,en.pdf](http://www.adur-worthing.gov.uk/media/media,132569,en.pdf)

The findings of the Ambiental report still apply and in the light of the now published WSCC CH2MHill report are even more relevant. We stated that the CH2MHill report should be taken into account to prove, as required by the National Planning Policy Framework (NPPF) clause 102, that before the site is included as an allocation in the plan, the surface water drainage issues can be addressed to ensure that flood risk to property elsewhere is not increased for the lifetime of the development. At this point, we understand that Adur DC is still intending to include the site allocation in the plan and leave the assessment of the technical and practical viability of flood risk reduction and drainage measures to the planning application stage after plan approval.

1. This categorically does not comply with the requirements of the NPPF.
2. The findings of the now published CH2MHill SWMP confirm the local drainage capacity problems and the vulnerability of the Lancing area to flooding from groundwater, regardless of any planned enhancements to the current infrastructure.

The Ambiental hydrology study clearly points out that surface water run off must be dealt with as a separate drainage system to that of the Lancing Brooks ditch network. The CH2MHill findings totally underpin that requirement and also the handling of foul waste drainage which requires similar attention.

We are therefore asking, will Adur DC be using the CH2MHill report to demonstrate that viable attenuation is possible to avoid ground/surface water flood risk to existing and new build properties and foul waste flows can be managed to be sure that this site can be made acceptable according to NPPF requirements at this pre-allocation stage? If this is undertaken and proves unsolvable – then NMF should be categorically deleted from the emerging plan.

If this is not carried out, then Adur DC will not have fulfilled the requirement of the NPPF to safeguard not only the proposed development but also the wider area of Lancing, which will be put at risk because of the lack of due diligence.

Reference Number	Organisation/ Company
22	Natural England
Q1 - Do you think the proposed amendment regarding the number of homes is appropriate?	
Q2 - Do you think the new indicative location for the roundabout is appropriate?	
Q3 - Do you think amending the boundary to include the existing site of Withy Patch is appropriate?	
Q4 - Do you think the relocated Withy Patch site is in the appropriate location?	
Q5 - Do you think showing the proposed Built Up Area Boundary as indicative is appropriate? Is there an alternative way of addressing this matter?	

General comments
<p>We have no comments on the questions posed in your consultation document insofar as they are beyond our remit.</p> <p>My brief general comments are as follows:</p> <p>We welcome the provision made in para 2.48, notably “The most important biodiversity habitats on the site, as identified by the Landscape and Ecological Survey, are the network of streams and ditches which flow eastwards through the small pastures to the north west of the site and along Mash Barn Lane. These form part of a wider network of water bodies between Lancing and Shoreham Airport. This network of riparian habitats should be retained and managed as part of an ecological network. The north-west area of the site (indicated on Map 2) also has potential to support a range of protected, rare/notable and BAP species and should also be retained, and where possible enhanced. A Landscape/Green Infrastructure Strategy should be produced and implemented to ensure that the site provides multi-functional benefits such as biodiversity, recreation and flood mitigation.”</p> <p>We also welcome the production of a “site wide landscape and ecological management plan ... to ensure the long-term maintenance of retained and newly created on-site habitats”.</p> <p>Reference in para 2.54 to the Shoreham Adur Tidal Walls, indicates they are not essential for development to take place at New Monks Farm. I trust the impact of these proposals on the Adur estuary (a SSSI) have been undertaken if these are proposals that arise from the Local Plan process, or that such assessment will take place as the proposals evolve as a separate project.</p> <p>There is currently significant pressure from consultations on land-use proposals and appeals, the completion of local plans, the review of existing plans, and work on neighbourhood plans (there are over 500 parishes in Kent and Sussex). This makes it difficult to devote the time that consultations deserve. Nevertheless, I hope you find these comments helpful. If there are issues I have not covered, please let me know and I will respond as quickly as possible. If discussion would be helpful, please give me a call.</p> <p>If you wish to comment on the service provided by Natural England, please use the appended form.</p>

Reference Number	Organisation/ Company
23	RPS Planning & Development
Q1 - Do you think the proposed amendment regarding the number of homes is appropriate?	
Q2 - Do you think the new indicative location for the roundabout is appropriate?	
Q3 - Do you think amending the boundary to include the existing site of Withy Patch is appropriate?	
Q4 - Do you think the relocated Withy Patch site is in the appropriate location?	
Q5 - Do you think showing the proposed Built Up Area Boundary as indicative is appropriate? Is there an alternative way of addressing this matter?	
General comments	
<p>I wish to submit a representation to the above consultation in relation to questions 1 and 5.</p> <p>RPS fully support the identification of the New Monks Farm Site Allocation for a mixed use development, including employment generating uses. However, it is believed that greater flexibility needs to be included in relation to the quantum of uses to come forward on the site. The proposed amount of employment generating floorspace and housing figures should include more flexibility. This will allow the local authority to respond to development opportunities, and accommodate a greater proportion of employment generating floorspace, if individual proposals of merit come forward within the plan period.</p> <p>I have attached the previous representation I submitted to the draft Adur Local Plan in 2012 which highlighted that there was a case to increase the amount of employment generating floorspace at New Monks Farm, and that the emerging site allocation should include flexibility and should not restrict the amount of employment generating floorspace for the site.</p>	

Reference Number	Organisation/ Company
24	Secretary Lancing Manor (S.E.) and Chair for Adur Floodwatch Group

Q1 - Do you think the proposed amendment regarding the number of homes is appropriate?

Q2 - Do you think the new indicative location for the roundabout is appropriate?

The Roundabout

Undoubtedly, in the light of the subsequent plan to upgrade the A27. Highways England will be re-examining the impact of such a new roundabout on this over busy highway.

From residents’ comments, there are a number of issues which must be borne in mind.

After the unfortunate event by the airport, newly installed ‘intelligent’ traffic lights at the Sussex Pad have changed the pattern of flow considerably. The knock on effect is that access from local roads into the A27 has become extremely difficult. Grinstead Lane in particular is now experiencing constant, day long tail backs up to the Manor Roundabout which only previously took place at peak traffic times. We ask what will be the impact of a roundabout on these traffic flows when, with even a minor traffic light change, difficulties to traffic flows are caused into and out of this over burdened road. And this takes no account of the many thousands of additional traffic movements a day from the NMF development and the proposed 15.000 sq m. of commercial development on the north east of the airport.

Residents are also constantly complaining about the speeds at which vehicles are travelling along the 40 mph stretch both towards and away from the Manor Roundabout. Despite even the flashing 40 mph signs on the west bound carriageway. What measures, with the location of a roundabout, will be taken to control the traffic speed to make this stretch safer and quieter for residents?

When travelling eastwards from the Manor Roundabout, residents living off the westbound carriageway use the U turn by Hoe Court to return westwards to access their properties. How will this be managed with the proposed change to the A27?

Q3 - Do you think amending the boundary to include the existing site of Withy Patch is appropriate?

The Traveller Site

Whether it lies within the NMF boundary or outside it is immaterial to the impact this will make on the area’s drainage. Raising the site on the Withy Patch will cause even more surface water run-off into the drainage network and flood plain with its capacity constraints, let alone flows into the A27 which already suffers from drainage issues in severe weather with, particularly, closures of the nearside, eastbound lane.

Coupled with that, the indicative location for the traveller site is directly over a drainage ditch which runs east/west just within the current NMF curtilage and parallel to the A27 westbound carriageway. Building over that means culverting which is unacceptable in terms of restriction of drainage and sideways filtering of groundwater into this drainage run. Once again - impairment to this already fragile drainage system.

Examining the proposed site also in respect of A27 drainage, this built up land will almost certainly be directly over a key drainage culvert into the Lancing Ditch network serving the A27. No doubt Highways England will be commenting on this.

Q4 - Do you think the relocated Withy Patch site is in the appropriate location?

See Q3

Q5 - Do you think showing the proposed Built Up Area Boundary as indicative is appropriate? Is there an alternative way of addressing this matter?

General comments

New Monks Farm/A27 Roundabout Consultation (9.12.15 – 4.1.16)

The following comments represent the concerns of both the Lancing Manor Residents’ Network and the Adur Floodwatch Group. Once again, we can only reiterate all the points of concern which have been made repeatedly by these community organisations in previous consultations, at council meetings and in the media. So far, Adur DC has ignored these grave concerns of the community it serves.

## New Monks Farm Development

Firstly, it is of considerable concern that ADC will not be putting forward a suitable mitigation scheme for the handling of surface water run off from what is now 600 homes/a school/10,000 sq m business development/a community centre and all the significant road infrastructure required before inclusion of this allocation in the Adur Plan..

The intention is to leave this to the development application stage once the Local Plan has been adopted (confirmed by the executive cabinet member Cllr Beresford at Full Council on the 17th December).

Similarly required, a scheme for drainage of foul waste which is also a key issue which even a lay person can see is a major part of the infrastructure which the local sewers would be unable to handle.

We would strongly draw attention to the NPPF rules, clause 102. in relation to this and the exception test where it clearly states that a development must be proved to be sustainable and not cause flooding elsewhere for its lifetime (and even improve drainage) before it is allocated within a local plan.

It simply must not be left to the whims of a developer at application stage.

Once again, we remind the authority, that Lancing and the whole of the Lancing Brooks area which the proposed NMF development lies within has a greater than 75% risk of ground water flooding. What impacts one part of this slow draining flood plain directly affects another, both upstream and downstream. We saw this clearly in the winters of 2012/13 & 2013/14 with the extreme weather we experienced and the 8 weeks of abject misery which these events caused to residents with flooding of homes, garages, gardens and loss of foul waste services.

The Environment Agency states that in terms of coastal and tidal flooding virtually the whole area has a zone 3 rating. Some parts of the area are rated 3b – which is pure flood plain, the rest is virtually all 3a with a very high risk of flooding.

Even with the installation of the £26m tidal walls scheme, this will have absolutely no benefit to reducing ground water issues. The whole area will still suffer from the >75% risk of flooding from groundwater – all the drainage from the Downs above, all the properties, all the local roads and the A27. We have well documented proof of the issues from severe weather in two recent winters where emergency measures costing hundreds of thousands of pounds were required both up stream and downstream of where the proposed NMF development is to be sited. This also severely affected the A27 where this new roundabout is proposed.

The outcome of these weather extremes prompted the WSCC, lead drainage authority to commission a complete study and SWMP for the whole of the Lancing Gap. This is now published. The study was undertaken by CH2MHill consultancy.

At the time of writing, there is no evidence to demonstrate that this document is being referenced in relation to the proposed NMF development and new roundabout. There are some significant key points which that study brings forward which strongly support our residents' grave concerns:

A) Lancing is vulnerable to flooding from multiple causes including surface water, groundwater and sewer flooding due to capacity constraints in the Lancing Brooks.

B) Whatever measures of improvement to the drainage system are undertaken, in extreme wet weather Lancing will always be vulnerable to drainage problems/flooding from ground water.

The report puts forward measures to improve the current situation for drainage and maintenance thereof and this takes absolutely no account of further development within the area served by the Lancing Brooks drainage system.

WSCC, the lead drainage authority, in its response to this consultation, must surely be advising if not insisting that the District Council takes into account the CH2MHill report before putting this allocation into the Local Plan. It should also be re-confirming its original 2013 consultation comments where it commented on the requirement to conform with the NPPF, clause 102, as outlined above.

In the light of this month's flooding events in Cumbria, Lancashire, Yorkshire and Scotland and where even the city

centres of Leeds, Manchester and York experienced the devastation of flooding because of totally unprecedented levels of rainfall and groundwater locally and on the high ground around those areas – this must highlight the requirement to re-evaluate the wisdom of including this NMF development/roundabout in the Adur Local Plan.

In the media, time and time again, expert comment on the floods warned about the problems of development on flood plains, areas like NMF – even the prime minister himself made comment on his visit to the stricken northern areas.

We must also alert you to the problems residents are now experiencing with obtaining insurance cover for their properties. Some have been refused insurance from companies from whom they have received cover without claims for many years. Others have been quoted astronomical premiums in the thousands of pounds to accept cover. This is further compounded by failed house sales because buyer searches have discovered recent flooding events and offers have been withdrawn. In one case, one seller had to reduce the sales price by tens of thousands to secure a buyer.

This is now affecting the community's financial well being.

May we also remind the authority of a recent planning refusal by Adur DC for 6 houses on the Old Petrol Filling Station on the A27 – AWD/1128/14 (one of the Local Plan's preferred allocations).

This was categorically not permitted to avoid causing 3rd party flood risk because of potential disruption to ground water flows and an inadequate surface water drainage plan. (There were a number of other reasons, also).

If the just 6 houses planned were not acceptable for those flood risk reasons, we ask how can 600 etc.etc. on NMF be acceptable immediately opposite? These will be located in an even worse area for drainage!

Surely, there is an inconsistency in the approach to what is and is not sustainable?

At the very least the CH2MHill SWMP should be referenced and a viable drainage solution proposed before the NMF allocation is included in the Local Plan, now made even worse by the greater number of 600 homes being proposed.

If there is no sustainable solution which can be viably identified without further impact on the capacity constraints of the Lancing Brooks drainage, then the NMF allocation should be deleted from the plan.

One observation. Currently, there has been fly tipping of considerable piles of rubbish just beyond the first entrance to the existing Traveller Site. This looks to have been dumped by a passing fly tipper. This has now been there for quite a long time.

EH are being advised with photo evidence.

What is concerning is that the rubbish has been visibly infested with rats and needs clearing and sanitising. With the relocation of the site it will be nearer the local housing. What will be the plan to ensure that any similar road access cannot be subject to such build-up of fly tipping and will be prevented in the interests of environmental health for any nearby properties and indeed the residents living in the travellers site itself?

## Summary

The unanimous concerns of residents are that NMF as a site plus the roundabout is totally inappropriate and puts the whole area at totally unacceptable, increased flood risk now even more so, having seen the evidence of the CH2MHill report and the devastation of flooding in the North of England/Scotland from unprecedented levels of weather which is even causing the Environment Agency to re-examine their criteria for flood risk management.

Once again, in the interests of care for future wellbeing of the community, Lancing Manor SE Residents' Network and Adur Floodwatch Group must insist that Adur District Council listens to its community and categorically excludes the New Monks Farm Development from the Adur Local Plan.

Reference Number	Organisation/ Company
25	Residents
Q1 - Do you think the proposed amendment regarding the number of homes is appropriate?	
Q2 - Do you think the new indicative location for the roundabout is appropriate?	
Q3 - Do you think amending the boundary to include the existing site of Withy Patch is appropriate?	
Q4 - Do you think the relocated Withy Patch site is in the appropriate location?	
Q5 - Do you think showing the proposed Built Up Area Boundary as indicative is appropriate? Is there an alternative way of addressing this matter?	
General comments	
<p>We have just been made aware of the proposed plans for the New Monks Farm site and we are alarmed at the proposed building plans. Before buying our bungalow in north Lancing we researched possible flood risk areas. The environment agency provided a map showing the flood plain which included all of the area of the proposed development. We do not read in the plans any proposals for dealing with what would seem to be inevitable flooding at some point - Cumbria, York, etc. our TV screens have made us very aware of the possibilities this winter and it would be frankly stupid to think it couldn't happen here.</p> <p>We are also concerned at the prospect of the increase in the traffic on the A27 which is already very congested most weekday mornings and evenings and the possibility of 600+ more vehicles trying to use the road will need more than a roundabout to ease any congestion.</p> <p>Finally we would trust that should this plan go ahead the houses should be built to the highest standard to withstand flooding, and should be affordable to provide housing for those most in need.</p> <p>We trust you will take our opinions into consideration when making your decisions.</p>	

Reference Number	Organisation/ Company
26	WSCC Councillor - Saltings Division

Q1 - Do you think the proposed amendment regarding the number of homes is appropriate?

Q2 - Do you think the new indicative location for the roundabout is appropriate?

Q3 - Do you think amending the boundary to include the existing site of Withy Patch is appropriate?

Q4 - Do you think the relocated Withy Patch site is in the appropriate location?

Q5 - Do you think showing the proposed Built Up Area Boundary as indicative is appropriate? Is there an alternative way of addressing this matter?

General comments

Draft 1

Direct Response to Adur District Council Regards Adur Local Plan Consultation.

Firstly, I have been contacted by many local residents regarding the Adur District Council Local Plan and the totally unrealistic number of houses that is required within that plan. This plan will totally change the face of our lovely district. There appears to have been scant regard for the quality of life for the people of the district-the underlying requirement - just build as many houses as possible and ‘sod the consequences’.

Adur District Council is simply allowing the slums of tomorrow to be built. This is due to the density and location.

In terms of this consultation, one must particularly note the blatant stupidity of building at the New Monks Farm location - 600 houses, an industrial estate and all that goes with it infrastructure wise -then to channel that traffic to one of the busiest roads in the County!! The lunatics have truly taken over the asylum!!!

Two major problems of building at NMF include guaranteed increased risk from flooding and the issue of removal of foul water and sewage.

First, let’s look at the flooding. The EA are to build improved Tidal Walls at many locations around Shoreham, a large element being at Shoreham Airport. Now Adur seems to think that when this is built, land to the west of the river will then be ‘open season’ as far as building is concerned.

But it won’t be!! The whole area has surface and ground water coming down from the Downs, all the local properties, gardens, local roads – even the A27 itself drain into and through the Lancing Brooks ditches and flood plain. On south side of the area there’s the influence of high tides also!

All that water not going to go away!!

The whole of the area has a greater than 75% risk of flooding from groundwater. The Tidal Walls Scheme will have an absolutely ZERO effect on improving that risk!

Also Adur District Council has also allowed 1.35 MILLION CUBIC METERS of earth to be tipped on the flood plain as a supposed golf course!! This is already having an effect on containment of water because the built up ground no longer has the ability to hold precipitation which means it runs straight into the already over capacity ditches.

At great expense West Sussex County Council engaged a specialist consultant CM2MHILL to enable better understanding of the area drainage and it needs. This report states the capacity limitations of the Lancing Brooks ditch network and no matter what measures are taken – in extreme weather for Lancing – drainage problems from ground water cannot be mitigated. In extreme weather, Lancing will always be vulnerable to flooding.

Now the EA is to build the tidal wall for extreme weather, for surges in from the sea. Now here’s the point - the EA would not invest £26 million if they did not think that more extreme weather was on its way.

Now look at what the other experts CH2MHill are saying. The ditch network CANT TAKE THE WATER IN EXTREME WEATHER!!

Despite the actions and comments from these two experts, it seems that Adur District Council don’t want to listen to these experts unless they say what Adur want them to say.

Surface water now needs to be looked at as Lancing brooks as reported by the CH2MHill report has capacity constraints. So for the proposed NMF development surface water will have to be disposed of through a totally separate large bore piped system which avoids putting any further water flows into the Lancing Brooks. As for sewage this will also need a large pumping station to remove waste. The current local system will not have the capacity to handle this enormous additional flow.

This particular part of Adur has experienced severe flooding over many decades indeed that was why the Lancing Brooks, previously a series of agricultural ditches, were used to remove water from the area to the sea and contain and slow down flows to avoid flooding in the area.

Lets look at Government rules in the National Planning Policy Framework ( NPPF ) this document states “ it must be demonstrated that a development provides wider sustainability benefits to the community that outweigh flood risk, informed by a strategic flood risk assessment where one has been prepared “.

So it looks like Adur are totally ignoring any flood risks associated with this development, which has been shown to be the case by the WSCC Consultant CH2MHill.

The NPPF also requires “ a site specific flood risk assessment must demonstrate that a development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere and where possible will reduce flood risk overall” Up to now ADC has not produced this and ignored any findings of the WSCC funded CH2MHill document. Indeed they did not want to wait the few months until the document was published, to understand the issues of the area.

ADC needs to commission expert assistance to prepare and demonstrate that a suitable surface water management scheme is possible to show that NMF can be developed with no increase of flood risk elsewhere. This must be done before this location can be integrated into the local plan.

This site specific document should NOT be left to the development stage, it needs to be undertaken before the location is placed within the local plan as per the requirements of the NPPF. If this is not done then that leaves ADC open to a Judicial Review of the matter with all the costs (which will fall to the rate payers of Adur) and time implications that would involve.

If no viable drainage scheme is possible - and I suspect this is the case because of the Authority's reticence about the CH2MHill study - in the interests of the community, the New Monks Farm development must be removed from the local plan.

Reference Number	Organisation/ Company
27	D R H Sunderland MA MSc RLC

Q1 - Do you think the proposed amendment regarding the number of homes is appropriate?

Q2 - Do you think the new indicative location for the roundabout is appropriate?

Q3 - Do you think amending the boundary to include the existing site of Withy Patch is appropriate?

Q4 - Do you think the relocated Withy Patch site is in the appropriate location?

Q5 - Do you think showing the proposed Built Up Area Boundary as indicative is appropriate? Is there an alternative way of addressing this matter?

General comments

Please excuse my slightly tardy response in relation to the New Monks Farm Development and the A27 Roundabout and I hope, despite being a day late, my views will be considered please.

My significant concern regarding both the New Monks Farm Development and its associated roundabout are the lack of mitigating measures to handle the surface and ground water run-off from the South Downs. You will appreciate the area is an established flood plain and the balance between water soaking away or flooding is very fragile and delicate. To demonstrate this you will be aware in recent years there has been significant flooding in the area along with the associated misery this brings to residents.

I am extremely concerned that removing parts of what is already a delicate flood plain area that appears to be working at full capacity and replacing it with concrete will do nothing but degrade the flood plain and encourage future flooding.

Whilst I have few concerns per se about the additional 600 homes, a large business development and school and community buildings coming to the area, this should not be at a cost to existing and new residents who will suffer the consequences of future flooding because appropriate measures were not put in place to ensure surface water was adequately catered for. I understand that under NPPF rules, it states that a development must be proved to be sustainable and not cause flooding elsewhere for its lifetime before it is allocated within a local plan. All I ask is that this clause be applied fully before the development is allowed to proceed. I would not be keen for such measures to be placed in the hands of developers but rather that my own council impose mitigation measures based on sound ecological and unbiased surveys to ensure the safety and wellbeing of existing residents in the area who will be forced to live with any consequences.

I am led to believe that a recent study undertaken by CH2MHill Consultancy supports my views regarding surface and ground water and I would urge my council to listen to these subject matter experts along with residents who base their concerns on evidenced experience. I would close by saying that the problem of excessive rain fall appears to be here to stay. A recent application to build six houses on the site of an old filling station on the A27 was recently rejected by Adur District Council on the grounds of third party flood risk. This was of course a welcome result for local residents. This application represents less than 1% of what is being planned for New Monks Farm. Surely, if my council is to be consistent, if the damage of 1% was sufficient enough to refuse planning then even to consider a development 600% larger would be completely nonsensical?

Please listen to our cries for help and support and either reject this development or, ensure that appropriate measures are in place to ensure the safety and wellbeing of existing residents by catering for surface and ground water. Please do not expect a profit driven developer to ensure these measures, the ecological balance is too fine in this area to get this one wrong.

Reference Number	Organisation/ Company
28	Historic England
Q1 - Do you think the proposed amendment regarding the number of homes is appropriate?	
Q2 - Do you think the new indicative location for the roundabout is appropriate?	
Historic England wishes to register its concern regarding the above proposed modification. The location of the revised proposed roundabout junction with the A27 is significantly close to the Scheduled Monument within the boundary of Shoreham Airport than that previously proposed and, consequently, has the potential to cause harm to setting of the heritage asset. The design and extent of the new junction will be key to the effect of any impact on the significance of the monument and we would expect to be closely involved at an early stage in discussions about the design if this proposal is taken forward.	
Q3 - Do you think amending the boundary to include the existing site of Withy Patch is appropriate?	
Q4 - Do you think the relocated Withy Patch site is in the appropriate location?	
Q5 - Do you think showing the proposed Built Up Area Boundary as indicative is appropriate? Is there an alternative way of addressing this matter?	
General comments	

Reference Number	Organisation/ Company
29	Resident
Q1 - Do you think the proposed amendment regarding the number of homes is appropriate?	
Q2 - Do you think the new indicative location for the roundabout is appropriate?	
Q3 - Do you think amending the boundary to include the existing site of Withy Patch is appropriate?	
Q4 - Do you think the relocated Withy Patch site is in the appropriate location?	
Q5 - Do you think showing the proposed Built Up Area Boundary as indicative is appropriate? Is there an alternative way of addressing this matter?	
General comments	
<p>The first question is, are you intending to build 600 homes on a flood plain?</p> <p>The second question is, have you been watching the news regarding Cumbria and the north floods?</p> <p>The third question is, are the people deciding to approve this crazy plan going to live there? (No, I didn't think so).</p> <p>Once again the Tory councillors are trying to run roughshod over the feelings of the people they are supposed to represent.</p> <p>Please think again or prepare for the fallout.</p>	

Reference Number	Organisation/ Company
30	West Sussex Local Access Forum - WSLAF

Q1 - Do you think the proposed amendment regarding the number of homes is appropriate?

Q2 - Do you think the new indicative location for the roundabout is appropriate?

WSLAF considers this matter to be of great importance, and is concerned that the additional traffic generated by the development, and the proposal for a new roundabout at the Sussex Pad junction, will make the situation for walkers, cyclists and equestrians crossing the A27 even more problematic.

The present signalized junction across the busy Shoreham by-Pass is hazardous enough for NMUs (especially equestrians) trying to link from the Old Shoreham Toll Bridge (Bridleway 2048/1) to the National Park (using bridleway 2065), though this at least stops the traffic and allows them to cross. A roundabout where there is no such control would effectively sever the link, and would be contrary to the aims and aspirations of the West Sussex Rights of Way Improvement Plan ([www.westsussex.gov.uk/rowip](http://www.westsussex.gov.uk/rowip)), incorporated in the present West Sussex Transport Plan.

Highways England (HE) has been aware for many years of the aspiration for a grade separated NMU (walker, cyclist, equestrian) bridge crossing at this location, which WSLAF fully supports. Unless this can be provided by HE and other partners, or an alternative improved crossing for NMUs designed and implemented, the present signalized Sussex Pad junction must remain.

Members would welcome the opportunity to offer further advice and assistance on this matter, and request that the Forum is kept informed of future plans for NMU access at this location.

Q3 - Do you think amending the boundary to include the existing site of Withy Patch is appropriate?

Q4 - Do you think the relocated Withy Patch site is in the appropriate location?

Q5 - Do you think showing the proposed Built Up Area Boundary as indicative is appropriate? Is there an alternative way of addressing this matter?

General comments