

10th May 2016



Planning Policy Team
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Dear Sirs

Re: Representation on the Adur and Worthing Local Plan

Introduction

Brighton & Hove City Council (hereafter referred to as the "BHCC") would like to thank Adur and Worthing Councils (AWC) for the opportunity to comment on their Submission Local Plan (hereafter referred to as the "Plan"). As the strategic planning document that will shape the future of the area, it is an important document that needs to create the right balance of social, economic and environmental objectives. The role it will play in future planning decisions will be critical, and it is important that the Plan successfully achieves this balance through its policies.

About the BHCC Downland Estate

At 10,500 acres, BHCC's Downland Estate comprises a substantial rural landholding falling under a single public ownership. Through ownership of the Downland Estate, BHCC - in addition to considering the Estate as part of their overall property investment portfolio - are also presented with the opportunity to deliver on conservation and social wellbeing related issues. This is encapsulated within the Council's City Downland Estate Policy (CDEP). The policy brings together the Property and Design team with the Council's City Parks and Sustainability Teams and seeks to incorporate social and environmental considerations not only into day-to-day management decision making, but also by identifying opportunities for the considerable environmental and social gains that can be realised through land ownership.

The CDEP has evolved out of the Downland Initiative and aims to:

'Sustain natural resources provided by the Council's Downland Estate by working in partnership with relevant stakeholders and potential beneficiaries and pursuing an economically sustainable approach for the Council and its tenant farmers.'

It examines the feasibility of securing sustainable management of the Downland Estate and is aligned with the Biosphere Reserve objectives. The Policy also incorporates the main Corporate Plan 2015-2019 objectives:

- 1) To tackle inequality and work to create a fairer city;
- 2) To create a more sustainable city;
- 3) To engage more individuals and groups across the city.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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The policy is implemented by working in partnership with Council departments, the SDNPA, tenant farmers and other stakeholders. The receipts from development opportunities form part of BHCC's Central Investment Fund. They are used to finance capital projects and new development, which provide substantial benefits for the local community.

Background to previous SHLAA submission

In 2014, BHCC submitted the Mill Hill site (Ref: ADC/126/13) for consideration as part of the Strategic Housing Land Availability Assessment (SHLAA) process. AWC subsequently assessed the site, through the 2015 SHLAA, and made the following comments:

ADC/126/13 Land at Mill Hill
Shoreham

This site, that was not previously considered as part of the 2009 and 2012 SHLAA review, is rejected from the scope of this study because it is not considered that there is a reasonable prospect that housing will be delivered on the site as the site (owned by Brighton & Hove City Council) is not currently available.

The original assessment queries whether the site is available for development, which I have addressed below. Through subsequent discussions with AWC a number of further questions were raised in relation to transport and landscape/visual impact. These are also addressed through this representation.

Description of Site

The site is located close to the town centre of Shoreham; to the north of The Street and to the west of Mill Hill. It is currently used as grazing land for horses and includes a number of stable buildings and other structures related to the sites equine use. Access is provided at the south-west corner of the site at the intersection of The Street and Mill Hill. Vegetation is limited to the perimeter of the site.

Topographically, the site slopes from north to south from approximately 15m AOD in the south-west corner to approximately 45m AOD in the north-east corner. Residential development is located to the south and east of the site. The northern and western parts of the site abut an area of woodland. Further to the north the site is the A27 (Shoreham Bypass). The National Park is located beyond the A27. However, it is severed from the site by virtue of the substantial road infrastructure. A public Right of Way runs around the north and west of the site.

Policy Context

The site is currently allocated in the Plan as being within the 'Countryside' (policy 13 – Adur's Countryside and Coast); and a 'Local Green Gap' (policy 14). These policies seeks to constrain development outside of the built up area boundary unless a number of specified criteria are met. This site is also partly-located within an area covered by a Site of Nature Conservation Importance (policy 32) designation.

Consultations on the Submission Local Plan

This section sets out BHCC's response to the SHLAA assessment and other subsequent points raised.

Tests of Soundness

Paragraph 182 of the National Planning Practice Guidance (NPPG) explains that plans should be:

- *Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;*
- *Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;*

- *Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and*
- *Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.*

The Plan forms a strong basis for facilitating sustainable development in the district. However, it is not currently sound for two main reasons:

- a) It has not been positively prepared because it is not based on a strategy that would meet objectively assessed development requirements; and
- b) It is also not consistent with national policy, particularly paragraph 47 of the National Planning Policy Framework, which urges local authorities to *'boost significantly the supply of housing...'* and *'meet their full objectively assessed need for market and affordable housing.'*

Housing Need

The AWC Objectively Assessed Needs (OAN) for Housing (2015) was recently updated and identifies a shortfall of 2,211 dwellings over the plan period. This was confirmed by the 8th March 2016 officer report to AWC planning committee, which explains that:

'...the amount of residential development that can be delivered (3,609 dwellings over the plan period - an annual delivery target of 180) when measured against Adur's Objectively Assessed Needs still results in a shortfall; this shortfall figure has been updated to 2,211 dwellings.' (page 4, para 3.8)

AWC will be aware that a number of local authorities, including BHCC, have had to review their housing sites through the Local Plan Examination Process to ensure that no stone is left unturned in their attempts to meet housing need. The Mill Hill site provides an important opportunity to fulfil some of this remaining housing need, including contributing to affordable housing provision. This would help to make sure that the Plan complies with the NPPF and is therefore sound.

Sustainable Location

The site is located in a highly sustainable location close to Shoreham town centre where there is a mainline train station, comprehensive bus service, shops and other services. These services can be walked to in approximately 15 minutes, or cycled to in 4 minutes, which will substantially reduce the need to travel by car.

Landscape and Visual Considerations

The latest landscape assessment by Sheilsflynn (2016) identifies the site as an important landscape area. This is set out on page 34 of the report where it states that:

'...any reduction in the size and openness of the field risks resulting in a change in character, as the field could potentially be perceived as a small urban paddock rather than a component of the sweeping Downs landscape.'

And that:

'If the urban areas were to extend across the Mill Hill Slopes, the A27 would mark the interface between urban development and countryside in longer views from the Downs. In such circumstances, the A27 would be perceived as a poor quality, abrupt visual boundary to the SDNP'

This part of the Sheilsflynn assessment is not agreed with because the landscape character of the site has already been largely compromised by the presence of the A27 which acts as a major physical barrier,

separating the site from the National Park and preventing it from being viewed as part of the 'sweeping downs landscape.'

With regards to visual sensitivity, it is agreed that the northerly and western parts of the site are sensitive. This is because they are more apparent in views of the site and are located closer to the Site of Nature Conservation Importance. However, the southern and eastern parts of the site, which are less visible and closer to the existing residential development, are less sensitive. In 2014, BHCC instructed Farbrik landscape architects to prepare landscape advice on the site, which reinforces this view.

A sensitive development at Mill Hill could provide an opportunity to protect the northern part of the site through the provision of publicly accessible open space to serve the needs of the local area and maintain the landscape character. This would provide opportunities to contribute to the green linkages provided by Mill Hill Local Nature Reserve and onwards to the South Downs National Park. The provision of new landscaped areas provides a related opportunity for biodiversity and ecology enhancements, which could potentially be linked to the River Adur to reinforce existing biodiversity areas.

Vehicular Access

During the SHLAA assessment process, questions were raised over whether suitable access could be achieved. BHCC has subsequently instructed a highways engineer (Bellamy Roberts) to visit the site and determine whether access could satisfactorily be achieved.

The work undertaken by Bellamy Roberts has determined that vehicular access can be achieved to a level that is an improvement on the existing situation. This includes the opportunity for safer and more legible access on to the site, suitable for a modest level of development. The results of this technical study are enclosed within this response.

Site Availability

During AWC's assessment of the site there was some uncertainty as to whether the site is available. On 22nd February 2016 I wrote to the planning policy department to clarify that the site is available and ready for development. A copy of the correspondence is enclosed with this representation.

Conclusion

BHCC would like to thank AWC for the opportunity to comment on and influence this important emerging planning policy. Finally, should officers want to meet with BHCC and its representatives to discuss this letter, we would be more than happy to do so.

Yours Sincerely


Andrew Watson • MRTPI

Associate Planner

e 

CC

- Jessica Hamilton, Brighton and Hove City Council
- Guy Streeter, Savills

Enclosures

- Bellamy Roberts transport study; copy of correspondence with AWC

Highway and Transportation Consultants



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Site for Potential
Residential Development
at Mill Hill, Shoreham

ACCESS FEASIBILITY REPORT

Brighton & Hove City Council

GDB/4826/AFR.2
March 2016



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Appendix 3	New Access (Drw. No. 4826/001)
Appendix 4	Tracked Diagram (Drw. No. 4826/201)

1.0 INTRODUCTION

- 1.1 The site, which forms part of the Brighton & Hove City Council (BHCC) Downland Estate located to the west of Mill Hill (Shoreham), has been entered into the Adur District Council Strategic Housing Land Availability Assessment (SHLAA) with a view to it being promoted through the local plan. The estimated capacity of the site is 120 dwellings. However, this figure would be refined through further design feasibility work.
- 1.2 Adur District Council has identified a potential constraint in relation to access. This report has been prepared to address the question of how satisfactory access to the potential housing site can be achieved.

2.0 SITE DESCRIPTION

- 2.1 A site location plan is attached at **Appendix 1**.
- 2.2 The land lies in the northwest corner of Shoreham with its northern boundary formed by the A27 Brighton Bypass and its western boundary formed by the edge of the escarpment down to the valley of the River Adur and parts of the Steyning Road Interchange with A27. The eastern boundary is formed by existing housing which fronts onto the west side of Mill Hill. The southern boundary is formed in part (the eastern length) by a tree belt along the north side of The Street, and the remainder of that boundary abuts the rear gardens of existing dwellings which are served off a cul-de-sac known as Lesser Foxholes.
- 2.3 The only existing access is an agricultural one in the southeast corner of the site at its junction with The Street and Mill Hill. Drivers emerging from that access have very poor visibility to both left and right, as well as emerging into the sub-standard and complex junction between The Street and Mill Hill. The existing layout of that junction is shown on the plan at **Appendix 2**. The existing access would not be suitable for serving a development of approximately 120 dwellings.
- 2.4 Mill Hill is a narrow lane with a carriageway width of some 4.2 metres and no footways. There are numerous individual driveways.

- 2.5 The Street has a carriageway width of approximately 6.5 metres with a footway only along the south side to its junction with Lodge Court. There is no footway west of that junction, the carriageway becomes very narrow and there are flint walls on both sides up against the edge of the carriageway. The road also runs around a blind bend.
- 2.6 East of the Mill Hill junction, The Street becomes known as Erringham Road and the carriageway width remains in the order of 6.5 metres. The footway continues along the west side of that road down to its junction with Upper Shoreham Road (A270) which is the main distributor road through this part of Shoreham.
- 2.7 Erringham Road provides the favoured route between the site and Upper Shoreham Road due to its carriageway width and footway provision. Routes to the west of Mill Hill are narrow and lacking in pedestrian facilities.
- 2.8 All of the roads in the vicinity are lit and contained within a 30mph speed limit. There are public footpaths around the exterior of the site along its northern, western and south western boundaries.

3.0 ACCESS

- 3.1 The only available access options are along the south eastern section of the southern boundary of the site due to private ownerships along the eastern boundary (Mill Hill); the remainder of the southern boundary (Lesser Foxholes); the A27 to the north; and the Adur Valley to the west.
- 3.2 The site boundary to The Street has a substantial tree belt along the entire length where ownership would allow access. There is also a level difference with the site being some 2-3 metres higher than The Street (this would need to be confirmed by Topographical Survey). The trees extend up to the edge of the carriageway with dense vegetation under-storey and a bank rising up to site level. Visually, the difference in levels appears to be greater towards the western end of this bank of trees than it is close to the junction with Mill Hill.
- 3.3 Any access formed directly onto The Street would need clear sight lines from an x-distance 2.4 metres back from the carriageway edge, for y-distances of at least

35-40 metres (and possibly more depending upon results of speed surveys) in both directions, measured to the nearside kerb. That would substantially affect the tree belt with loss of trees and under-storey over a significant length. Given the level difference between the site and The Street, there would be a need to cut the new access into the bank, and the earth works associated with that would further affect the tree belt.

3.4 There is a distance of some 90 metres between the junctions of The Street with Mill Hill and with Lodge Court. Given the need for adequate spacing between junctions, a sensible approach would be to place an access into the site midway between these two existing junctions. Provision of the necessary visibility splays would therefore result in the loss of a significant amount of tree belt for most of the distance between the two junctions. However, there is an alternative solution for access which has less impact. This is shown on the plan attached at **Appendix 3** and described below.

3.5 It is proposed that the location of the existing agricultural access on the corner of the junction with Mill Hill would be used, so that the route northwards up Erringham Road onto The Street would continue as the priority traffic route in a northwesterly direction into the development site. The Street would then be turned in a northeasterly direction to a Give Way junction with that new access road, as shown on the plan at Appendix 3. The existing complex junction of Mill Hill, with the grass island in the middle of it and two-way traffic around each side of that island, would then be simplified into a more conventional T-junction layout. The existing junction of Mill Hill with The Street suffers from poor sightlines for traffic emerging from Mill Hill when looking to the right. The proposed amendments to the junction as shown on the plan at Appendix 3 resolve that deficiency, and provide traffic emerging from Mill Hill with sightlines to the requisite standards. Similarly, traffic from The Street waiting to emerge onto the new site access road (which would be the priority route) would have full sightlines to standard.

3.6 The drawing shows how pedestrian connections would be made across the new site access road to tie into the existing footway provisions along The Street and down towards Erringham Road. Pedestrians would be deterred from taking other

routes which would lead them to existing roads with no footway provision. The extension of existing private driveway accesses onto The Street are also shown.

3.7 Turning The Street into the new site access road in the manner shown on the plan at Appendix 3 would involve the loss of part of the tree belt at the southeastern end of the frontage to The Street. The plan at Appendix 3 shows notional earthworks arising out of the need to coordinate levels, the details of which would be resolved at the design stage with the benefit of a Topographic Survey. With provision of these essential earthworks, forward visibility for eastbound traffic on The Street to the Give Way Junction with the new site access road would be achieved in accordance with the relevant standards.

3.8 At present, the majority of traffic using Mill Hill travels to and from Erringham Road and therefore uses the two-way route to the east of the existing grass island. The layout results in traffic heading from north to south and giving way at the junction with The Street being at a very oblique angle to the main road, which further hinders visibility to the right. The proposed layout removes the grass island to create a more conventional T-junction arrangement. In order to prevent northbound drivers short-cutting the junction, a raised thermoplastic island is proposed to divide northbound and southbound traffic at the junction. A physical island is not feasible due to the need for larger vehicles to make the right turn from Erringham Road into Mill Hill. The tracked diagram at **Appendix 4** shows how this manoeuvre is catered for by the proposed layout.

3.9 This form of access to the proposed development will naturally direct traffic leaving the site towards Erringham Road, and that preferred route to Upper Shoreham Road for distribution further afield. That is a further benefit of the scheme.

4.0 CONCLUSIONS

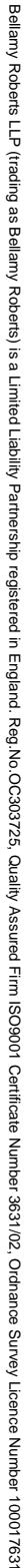
4.1 The layout at Appendix 3 demonstrates that satisfactory access to the potential development site can be achieved in a manner which satisfies appropriate highway safety standards, and which minimises tree loss along the southern

boundary of the site compared with any other options which involve direct access to The Street at right angles to that road.

- 4.2 New planting in and around the junction area, within the site, would help to replace the trees lost as a result of forming the access. This solution also results in the provision of proper visibility for traffic emerging from Mill Hill which is currently sub-standard, and it encourages traffic to and from the site to use the preferred route via Erringham Road. Overall, there will be a wider highways benefit to reconfiguring this access point.

APPENDICES

APPENDIX 1



CLIENT		 <p> Clover House Western Lane Odham Hampshire, RG29 1TU Tel: 01256 703555 Fax: 01256 704934 Email: info@bellamyarchitects.co.uk </p>	
PROJECT		<p>Brighton & Hove City Council</p> <p>Land at Mill Hill, Shoreham</p>	
TITLE		Location Plan	
DRAWN BY ARM	DESIGN BY -	CHECK BY GDB	DATE 29/03/16
SCALE 1:5,000 @ A3		DRAWING No. 4826 / 003	
		REF No	

APPENDIX 2



Notes



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CLIENT
Brighton & Hove City Council

PROJECT
Land at Mill Hill, Shoreham

TITLE

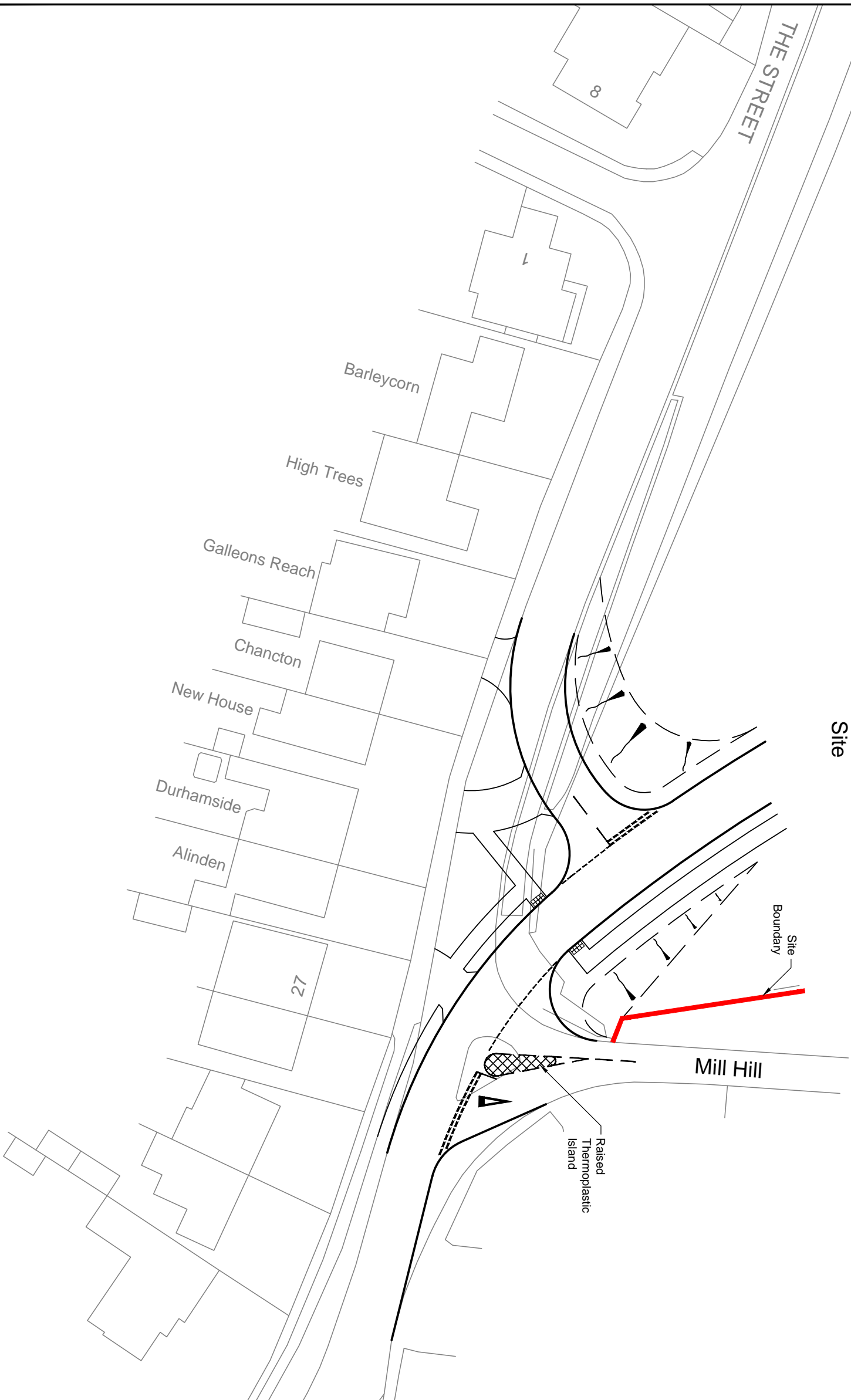
Existing Junction Layout

DRAWN BY	ARM	DESIGN BY	-	CHEK BY	GDB
DATE	29/03/16	DRAWING NO.	4826 / 002	REV. NO.	
SCALE	1:500 @ A3				

APPENDIX 3



Development
Site



Notes

Earthworks indicative only depending upon topographical survey.



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Brighton & Hove City Council

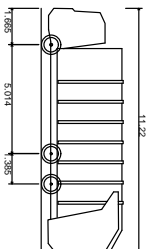
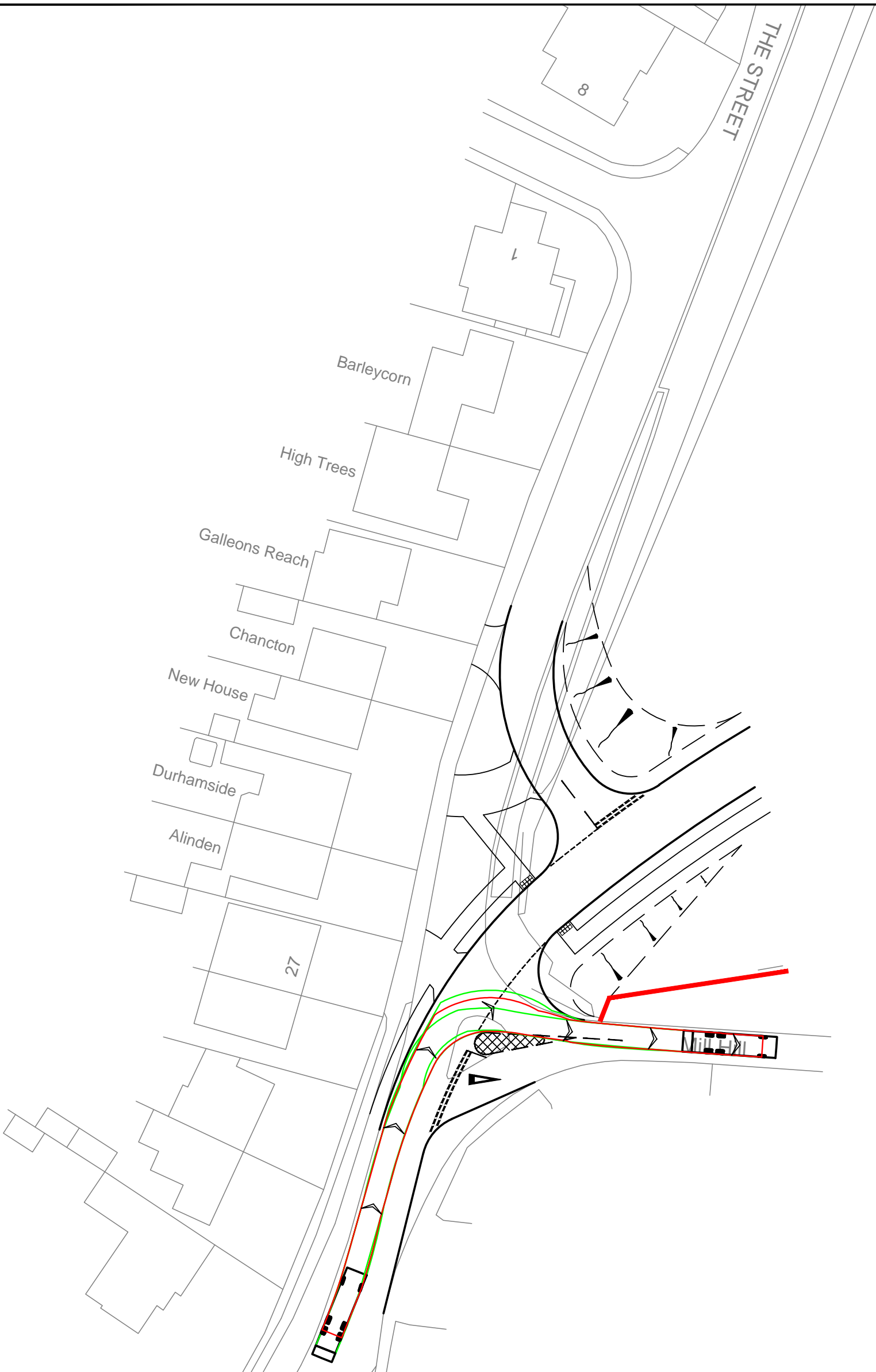
PROJECT
Land at Mill Hill, Shoreham

TITLE

Proposed Road Improvements

DRAWN BY	ARM	DESIGN BY	GDB	CHEK BY	GDB
DATE	29/03/16	DRAWING NO.	4826 / 001	REV/NO.	
SCALE	1:500 @ A3				

APPENDIX 4



Phoenix 2 Duo Recycler (P2-15W with Elite 6x4 chassis)
Overall Length 11.220m
Overall Width 3.074m
Overall Body Height 1.385m
Min Body Ground Clearance 0.309m
Track Width 2.530m
Lock to Lock Time 4.00s
Kerb to Kerb Turning Radius 11.550m

Notes



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CLIENT
Brighton & Hove City Council

PROJECT
Land at Mill Hill, Shoreham

TITLE
Swept Path Profile
Refuse Vehicle

DRAWN BY	ARM	DESIGN BY	-	CHEK BY	GDB
DATE	29/03/16	DRAWING NO.	4826 / 201	REV. NO.	
SCALE	1:500 @ A3				

Landscape Review and Recommendations

Land at Mill Hill, Shoreham-by-Sea



Job No. D2226

May 2014 – Revision A

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1. Executive Summary

fabrik Chartered Landscape Architects have been appointed by Brighton and Hove City Council to prepare a landscape feasibility report of the Site at Mill Hill on the north-western edge of Shoreham-by-Sea, West Sussex. This has included: a review of the landscape evidence base; identifying the potential landscape led development opportunities for the Site; and potential landscape and visual effects.

It is considered that a portion of land in the south-eastern section of the Site could come forward for development without compromising the setting of the South Downs National Park or Local Green Gap.

The location and extent of the landscape led development parameters have been prepared through a combination of both desk and field based studies.

2. Introduction

fabrik Chartered Landscape Architects have been appointed by Brighton and Hove City Council to prepare a landscape feasibility report of the Site at Mill Hill on the north-western edge of Shoreham-by-Sea, West Sussex. This has included: a review of the landscape evidence base; identifying the potential landscape led development opportunities for the Site; and potential landscape and visual effects.

The extent of the Site is illustrated on the plan opposite.

This report considers landscape policy and landscape evidence base. It also describes the existing topography, land cover, landscape features, and landscape character of the local area to derive a landscape development parameters plan.

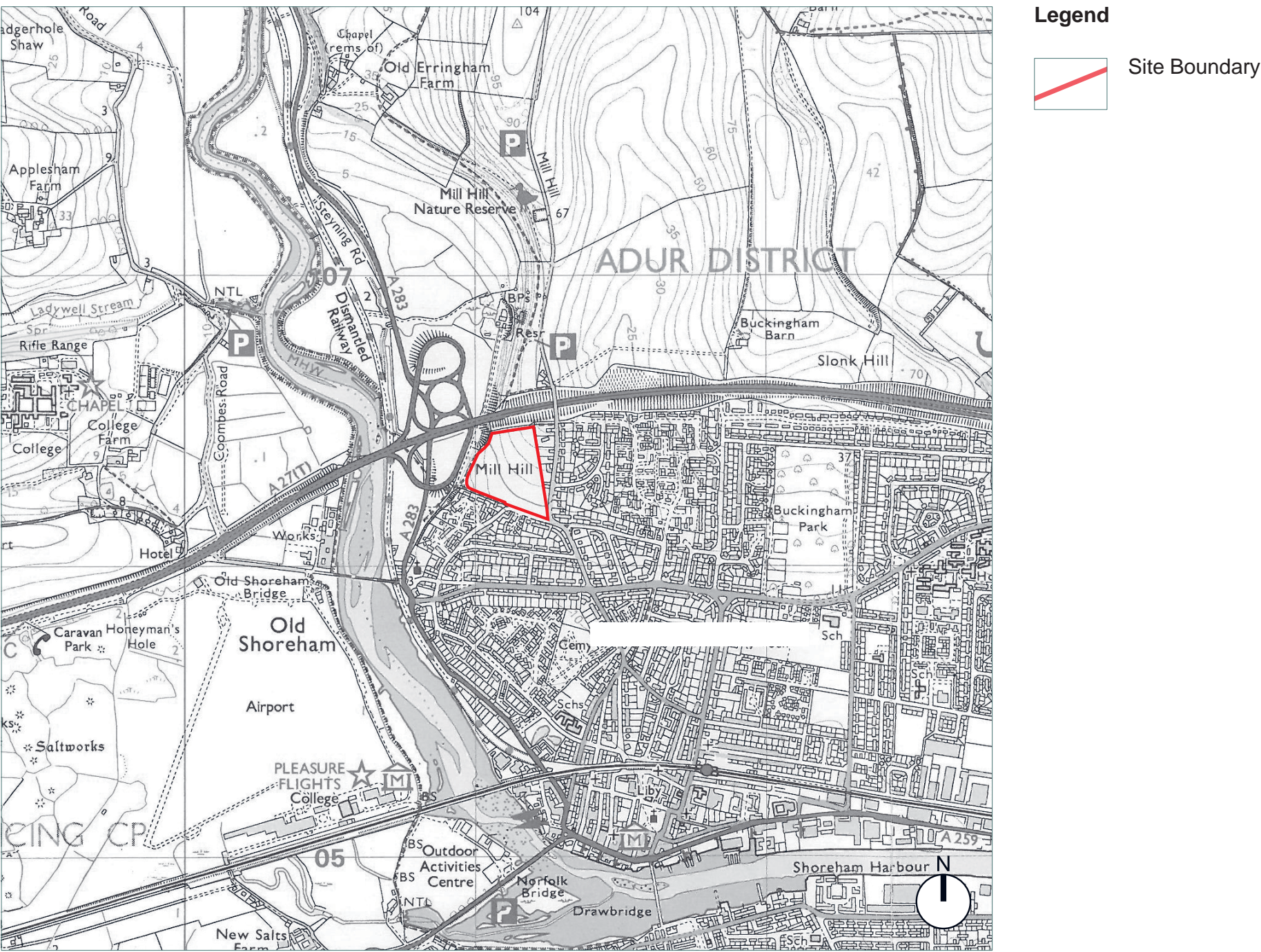


Figure 2.1 – Extract from Ordnance Survey map showing the location of the Site

3. Baseline Conditions

3.1 Current Saved Landscape Designations and Policy

The plan opposite illustrates an extract of the Proposals Map from the Adopted April 2006 Adur Local Plan with the Site boundary added. The legend identifies the landscape, ecological, heritage designations relevant to this study.

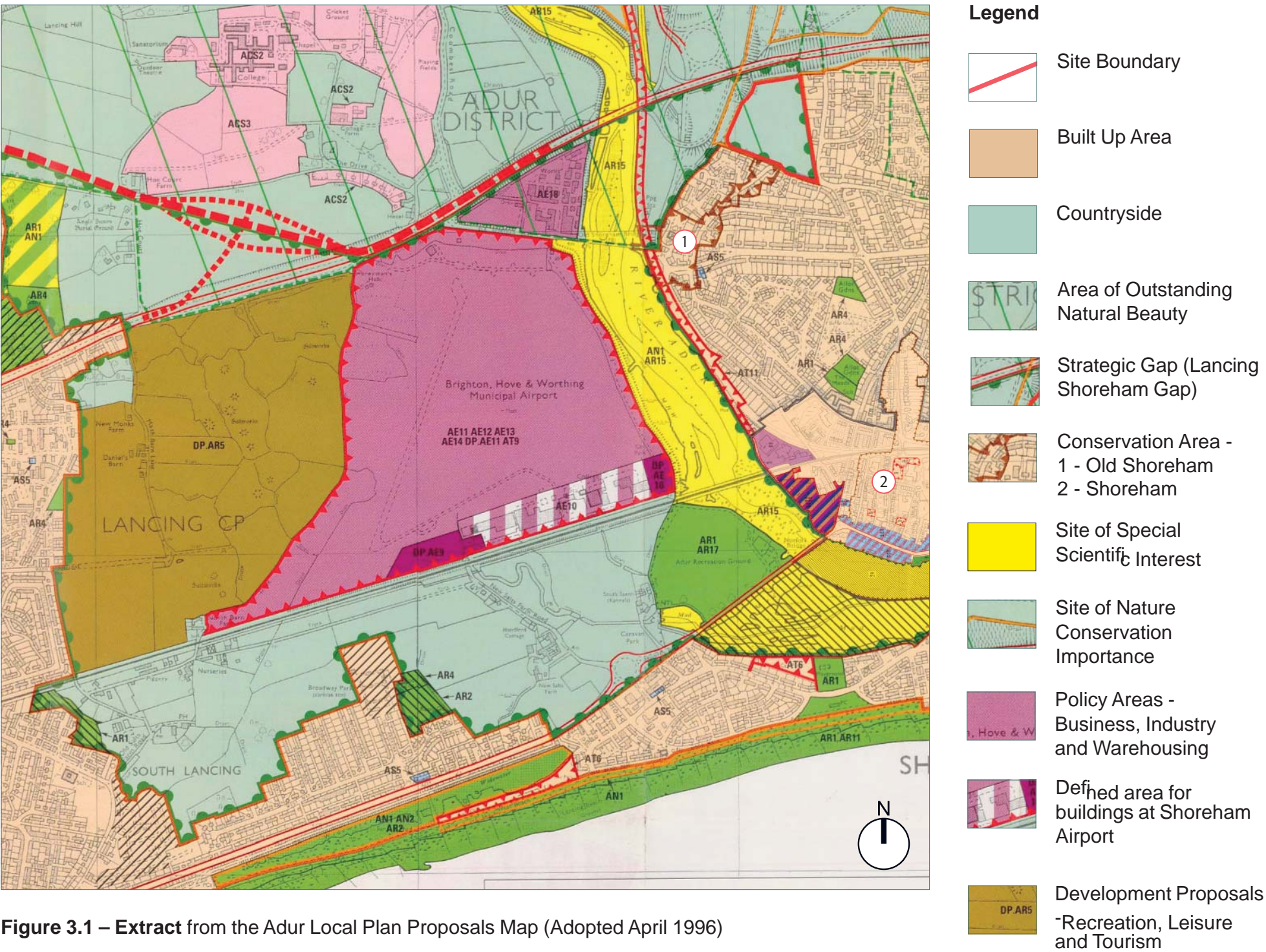
The Adopted Plan and saved policies show the Site lying within the South Downs Area of Outstanding Natural Beauty (AONB). However, it is to be noted that this designation has subsequently been replaced by the South Downs National Park, the boundary of which has been pulled back to the north of the A27 and therefore no longer covers the Site. The Site also lies within Countryside and within the Lancing to Shoreham Strategic Gap. The Built Up Area boundary abuts the Site to the east and south. The northern edge of the Old Shoreham Conservation Area abuts part of the southern boundary.

In terms of ecological designations, a Site of Nature Conservation Importance abuts the Sites northern and western boundaries. The River Adur, which is tidal in this location, is designated a Site of Special Scientific Interest (SSSI). There are public rights of way along the western bank of the River and along part of its eastern bank, with Old Shoreham Toll Bridge allowing pedestrian/cycle only connections across the River. Mill Hill Nature Reserve lies north of the A27, accessible via public footpaths leading from Mill Hill (road).

As such the Site is currently subject to the policies set out below.

Saved Policy AC1 on development in the countryside states that: *“The District Planning Authority will seek to protect the countryside of the Adur District for its own sake from development which does not need a countryside location. Permission will not normally be granted for:*

- a) *development outside the boundary of the built-up area shown on the Proposals Map...*
- b) *...the consolidation of linear or sporadic development.”*



3. Baseline Conditions

3.1 Current Saved Landscape Designations and Policy (continued)

The Policies on the AONB are in the interim covered by para 115 of the NPPF which states that: *“Great weight should be given to conserving landscape and scenic beauty in National Parks... which have the highest status of protection in relation to landscape and scenic beauty...”*.

In terms of Strategic Gaps, Policy AC4 states that: *“Boundaries... that define a strategic gap between the built-up areas of Lancing and Shoreham-by-Sea...Except where provided for elsewhere in this Local Plan, within these two defined areas, development will not normally be permitted... This is in order to prevent coalescence and to retain the separate identities and amenities of the settlements.*

Only in compelling circumstances will development be permitted...

Where circumstances are regarded to be competing, planning permissions will be subject to control over siting and design so as to minimise any impact on the landscape and subject to access and environmental criteria.

Opportunities will be sought to conserve and improve the landscape and amenity of these strategic gaps to enhance their value as open countryside. Extensive development for recreational purposes may be permitted where such development will improve the landscape, will not damage nature conservation interests, will not involve substantial buildings or hard-surfaced areas and will not involve the irreversible development or loss of the best and most versatile agricultural land.”

The ecological designations are subject to Policies AN1 and AR15, although no reference is made in the assessment of saved policies on whether this is to be retained.

Development within Conservation Areas only are subject to Policies AB4, AB5 and AB6. This report does not provide any specific guidance on heritage issues.

The land associated with the existing airport buildings is covered by Policy AE10. Shoreham Airport land holding area is identified as Business, Industry and Warehousing and is subject to Policies AE11-14, AE18, DP.AE11 and AT9.

Policy AE10 sets out that, with the exception of Policy DP.AE11, future development is to be located within the hatched area only. Policy AE11 deals with the provision of new hangars; Policy AE12 deals with the use of buildings in relation to the Town and Country Planning (Use Classes) Order. The future improvement of Northbrook College is the subject for Policy AE13. Policy AE14 deals with noise and fume emissions. Development Proposal DP.AE11 sets out that the Council supports the establishment of an aviation heritage museum within the airport's boundary, subject to scale, location and design in relation to the Airport's countryside location.

3. Baseline Conditions

3.2 Emerging Landscape Designations and Policy

The plan opposite illustrates an extract from the Proposals Maps for the Revised Draft Adur Local Plan 2013, showing the proposed amendments to the Shoreham Local Green Gap. The plan opposite has been further amended by fabrik to show the Site boundary and Listed Buildings.

The western section of the Gap designation is proposed to reduce, allowing the allocation of development at New Monks Farm. The Gap has also been reduced north of the A27, where the landscape is covered by the South Downs National Park (SDNP) designation. The settlement boundary edge of Shoreham to the east of the Site has extended to the northern edge of the A27 corridor.

The designated landscape of the SDNP lies to the north of the Site, beyond the A27 road corridor. The Site itself is shown as included within the north-eastern edge of the Local Gap and bound to the east and south by the existing Built Up Areas of Shoreham.

Three Listed Buildings are located on The Street to the south of the Site: Adur Lodge with Wall Along the Road (Grade II), 4 and 5 The Street (Grade II) and Hunter’s Moon Cottage (Grade II). Further south-west, the Church of St Nicholas (Grade I) and The Old School House (Grade II) lie on St Nicholas Lane, while the Red Lion Public House (Grade II) lies on the A283 Steyning Road. The last three are located near the east end of the Old Shoreham Toll Bridge. There are a number of Listed Buildings at Lancing College set below the ridgeline of Lancing Hill lie to the north-west of the Site, including the Grade I Listed Chapel.

The following emerging policies are pertinent to the study area:

Revised Draft Policy 13 on Adur’s Countryside and Coast states that: *“Outside of the Built Up Area Boundary (and outside of the sites identified in Part Two of this plan) development will only be permitted where the need for a countryside location is essential; it is for quiet informal recreation or the essential needs of agriculture*

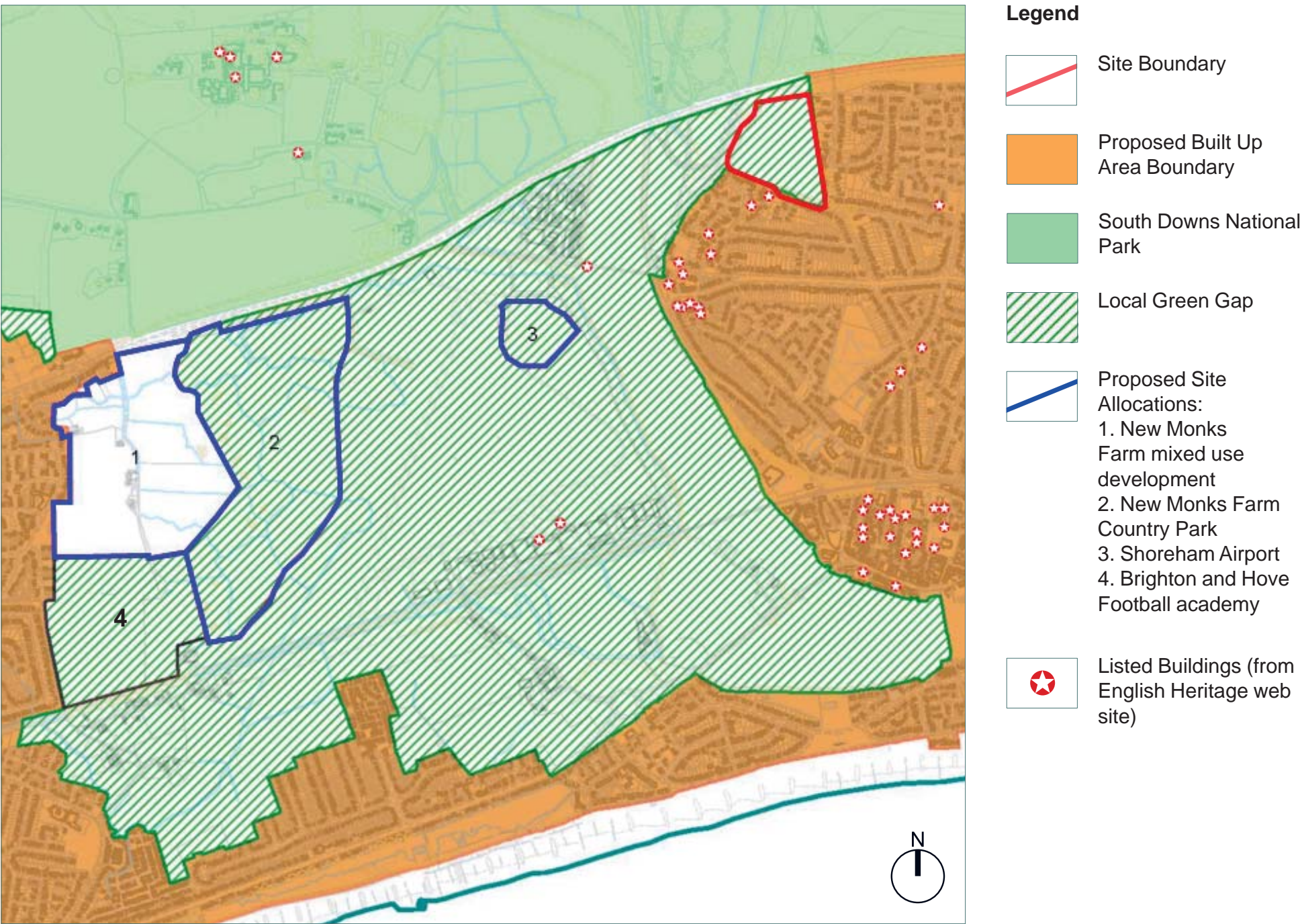


Figure 3.2 – Extract from the Revised Draft Adur Local Plan Proposals Map (2013) showing proposed amendments to the Shoreham Local Green Gap

3. Baseline Conditions

3.2 Emerging Landscape Designations and Policy (continued)

or horticulture, flood management, or is otherwise consistent with this Local Plan (or subsequent DPD's). Improvements to green infrastructure, including enhanced pedestrian and cycle links, and better access for those with mobility difficulties will be supported. The extension of isolated groups of buildings or the consolidation of linear or sporadic development will not be permitted.

Any development in the countryside should not result in a level of activity which has an adverse impact on the character of the area.

Outside of the strategic sites identified in this Local Plan, Local Green Gaps between the settlements of... Lancing Shoreham-by-Sea will be protected in order to retain the separate identities and character of these settlements. Within these areas any development permitted must not (individually or cumulatively) lead to the coalescence of settlements.

The landscape character of Adur and other areas of countryside, the coast, river, and settlement pattern will be protected and where possible enhanced. Any development or activities within the countryside must respect and where appropriate reinforce the distinctiveness and sense of place of the above areas, taking into account the various elements which contribute to their distinctiveness such as geology and landform, biodiversity, scenic quality, strategic views, tree cover, settlement patterns, heritage and local vernacular, and land use. The setting of the South Downs National Park must be respected...

The allocation at New Monks Farm proposes 450-600 homes, with the land to the west allocated for a country park. An Elite Football Performance Centre including large white buildings and high fenced training areas has been constructed along Mash Barn Lane to the north-west of the Airport.

The allocation at Shoreham Airport proposes, as set out in Revised Draft Policy 7 includes: "Subject to landscape considerations, approximately 15,000 sqm of new employment generating

floorspace... New development at the Airport must be designed to minimise its impact on the open nature of the Shoreham-Lancing Local Green Gap and ensure key views are retained, as well as minimise any impacts on the historic character of the Airport and the historic assets within it..."

Future development proposals will need to comply with a number of Development Management Policies as follows:

- Revised Draft Policy 14 on Quality of the Built Environment and Public Realm;
- Policy 15 on A Strategic Approach to the Historic Environment;
- Policy 22 on Density;
- Policy 30 on Green Infrastructure;
- Policy 31 on Biodiversity;
- Policy 32 on Open Space, Recreation and Leisure.

3.3 Critique of Landscape Evidence Base

The background evidence base to the emerging Local Plan includes a report on the 'Landscape and ecological surveys of key sites within the Adur District' (November 2012) by Sheils Flynn and the Ecology Consultancy. The report provides a review of the potential greenfield development sites identified by Adur District Council and it appears also forms the landscape character assessment for the district. The selection of these sites was based on an Urban Fringe Study (December 2006). The report includes a plan on Landscape Planning Policy. This plan however not only includes elements such as woodland, watercourses and open access land which are not set out on the adopted Local Plan, but also includes elements from later studies such as the Adur Open Space, Sport and Recreation Study of 2005. It therefore does not show the layers of planning policy and how this is emerging.

The document sets out landscape character and sensitivity based on the character areas identified in the Urban Fringe Study. The

Site is identified as LCA9 - Mill Hill Slopes. This character area is identified as having a medium-high character sensitivity; a high visual sensitivity; and therefore an overall high landscape sensitivity.

Following the establishment of the sensitivity of each of the character areas, the document then goes on to review each of the strategic site allocations to set out a series of 'indicative development principles'.

The main report is supported by a series of technical landscape and ecological studies. The key study relevant to landscape and visual issues is Annex A. This sets out that the assessment of landscape character and sensitivity has been carried out in accordance with Topic Paper 6: Techniques and Criteria for Judging Capacity and Sensitivity by the Countryside Agency and Scottish Natural Heritage (2005). However, whilst Annex A includes a broad methodology and sets out a matrix on how landscape and visual sensitivities combine to determine the overall sensitivity of each of the character areas, no further information is provided on what elements are considered in the scoring of the landscape or visual elements to determine the grades of sensitivity for each of the character areas. It is therefore difficult to understand how the final judgement on landscape sensitivity is reached without this key background evidence base. For example, in addition to assessing each of the elements in accordance with Topic Paper 6 (at Figure 1(a), as this report effectively is considering the capacity of the landscape to accept change, we would consider that landscape value should also be considered (as set out at Figure 1(b) of Topic Paper 6). Thus, for example, a highly sensitive landscape would include designated landscapes of international or national interest, such as World Heritage Sites or National Parks or whether the sites form part of the setting to these. Whilst this information may have been considered in the report, no evidence base is provided to substantiate each of the judgements made on landscape or visual sensitivity.

In terms of the visual receptors and sensitivity, the report has selected views from those that have a 'relatively' high sensitivity. Whilst we concur that the views should be selected to represent the worst case scenario, we would challenge that only 'relatively high' receptors have been considered.

3. Baseline Conditions

3.4 Site Description

Topography: The Site lies on the south-west facing valley slopes of the River Adur, where the ground rises from approximately 15m AOD in the south-west corner to approximately 45m AOD in the north-eastern corner. The Site is severed from land to the north by the wide A27 road corridor, which in this location passes through a deep cutting with shear side slopes.

The settlement of Shoreham lies on the eastern side of the River, with development rising from the lower lying ground and water front, up the valley slopes to the edge of the A27 cutting.

The Site is therefore perceived principally as an integral part of the existing settlement which overlooks the River Adur.

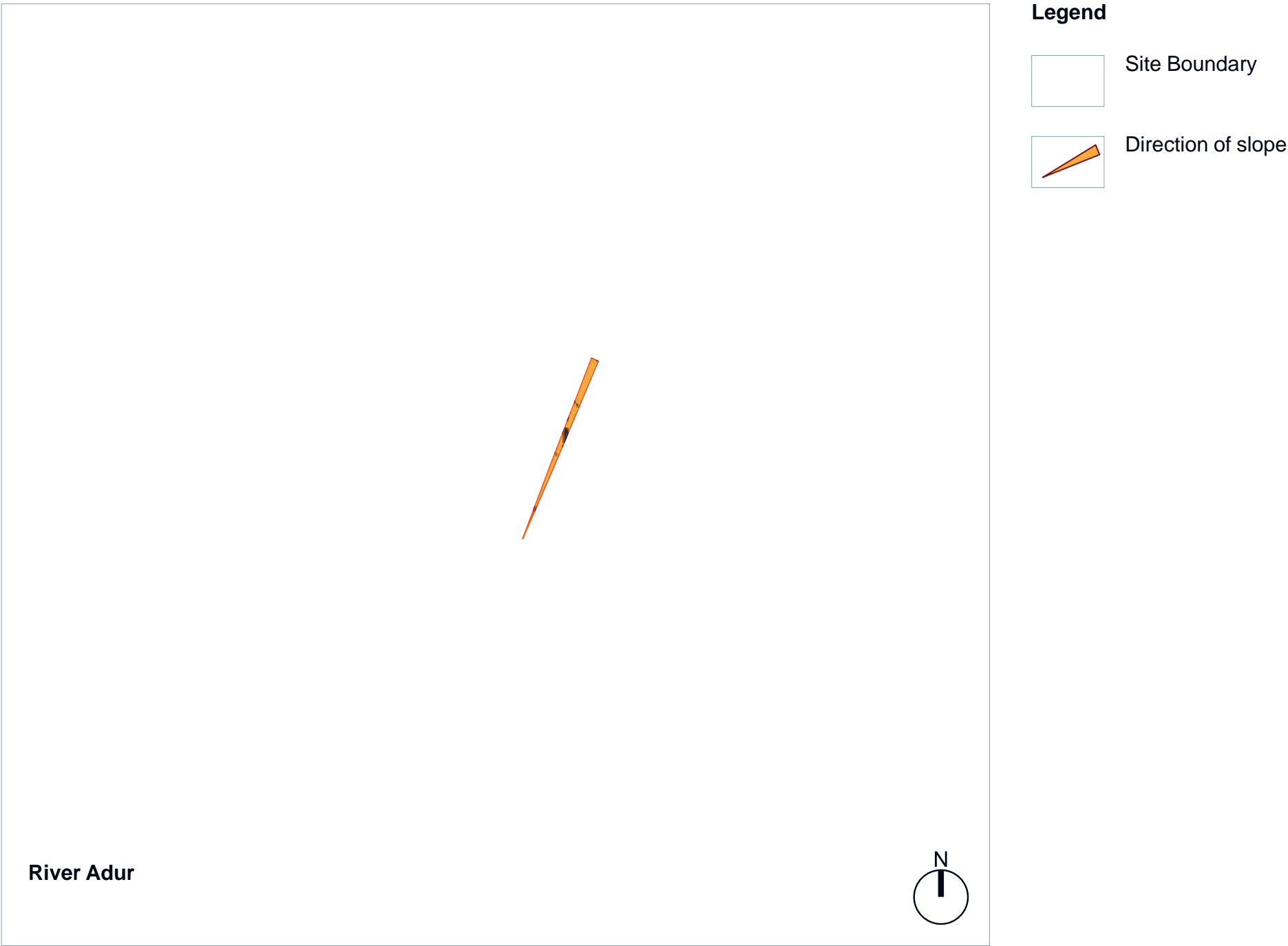


Figure 3.3 – Plan showing the existing site landscape

3. Baseline Conditions

3.4 Site Description (continued)

Land Use: The Site is currently grassed and divided into a series of horse paddocks by light-weight fencing and is typical of an urban fringe site. There are several timber/metal sheds in the southern area used for storage, and a narrow path across the southern edge, surfaced with bark mulch to allow passage from the access gate in the south-east corner. A number of additional gates along the path control access within the Site.

The Site is bound by the steep chalk cutting of the A27 to the north and the very steep, wooded cutting associated with the slip road off the A27 joining with the A283.

A Public Right of Way (footpath) follows the northern and western edges of the Site, separated from it by timber post and wire/barbed fencing. The footpath connects The Street with Mill Hill and joins a further connection which drops to the A283 to the west. The southern and western sections of the footpath, as well as part of the connecting path are so overgrown in summer that passage is very difficult and it therefore appears that the path is little used, except in the northern section parallel with the A27.

The Site is bound to the east and south by dwellings of various sizes, architectural style and materials. Those to the south are mainly separated from the Site by the public footpath and tree and shrub/scrub vegetation. Apart from the Listed Buildings which feature flint walling, most of this development appears to have been constructed in the latter part of the 20th century. A few dwellings/property fences lie close to the public footpath around the south-western part of the Site. The majority of the nearby properties are set in relatively large plots with well-vegetated gardens.

Vegetation: Vegetation within the Site is mainly limited to the short grasslands used for horse grazing, with some edges left to grow long. There are occasional scrub bushes within the Site. Beyond the Site boundaries lie dense trees, scrub and shrub bushes. Mature trees growing along a bank on the north side of The Street enclose the Site.



Figure 3.4 – Plan showing the existing site landscape

3. Baseline Conditions

3.4 Site Description (continued)

Detracting Features: The A27 road corridor and its associated slip roads traverse and dissect the landscape, and are audible from parts of the Site, surrounding footpaths and nearby residential areas.

Landscape Features: It is considered that the landscape to the north of the A27 forming the SDNP; the River Adur and its valley floor; together with the Chapel of Lancing College set on rising ground are all key landscape features locally. St Nicholas Church and the Shoreham Toll Bridge are also local features of interest.

Views: The Site is most evident in views for those receptors immediately adjacent to it. It is also visible from a limited number of surrounding key locations - Lancing Ring at a distance of around 3km to the north-west, and from the edges of the River Adur and Old Shoreham Toll Bridge to the west. With the exception of the residential receptors adjacent to the Site, many of these are passing views, with vegetation or other features creating some screening. The openness of the riverine and associated landscape to the west allows some views to the Site from open and elevated locations. The Site is also seen from these locations in the context of the A27 and settlement of Shoreham.

The wider visual envelope to the Site is limited to the east and south by topography and built form. In addition, views of the Site from within the South Downs to the north of it are limited by topography and the intervening vegetation of the A27.

4. Landscape Considerations and Opportunities

4.1 Landscape Considerations and Opportunities

The plan opposite illustrates the series of landscape considerations and opportunities identified in this appraisal. These are identified as follows:

Important Considerations:

- The designated landscape of the South Downs National Park to the north and consideration of potential for effects on its setting and views out from the area.
- The Gap designation which covers the Site and its relationship to the existing settlement.
- The Listed Buildings around the Site.
- The amenity of neighbouring dwellings to the east and south.
- Views towards the Site and wider settlement from the River Adur corridor and land to the west of it.

Opportunities:

- The A27 road corridor to the north of the Site, its associated slip road with the A283 to the west of the Site, and their cuttings which provides a continuation of the defensible edges to the Site and wider settlement.
- Providing development closely associated with existing development.
- The existing robust buffer of vegetation around the Site that contributes to the an immediate landscape setting to development.
- The boundary vegetation provides physical and visual separation from The Street and nearby listed buildings and could be reinforced with additional planting.

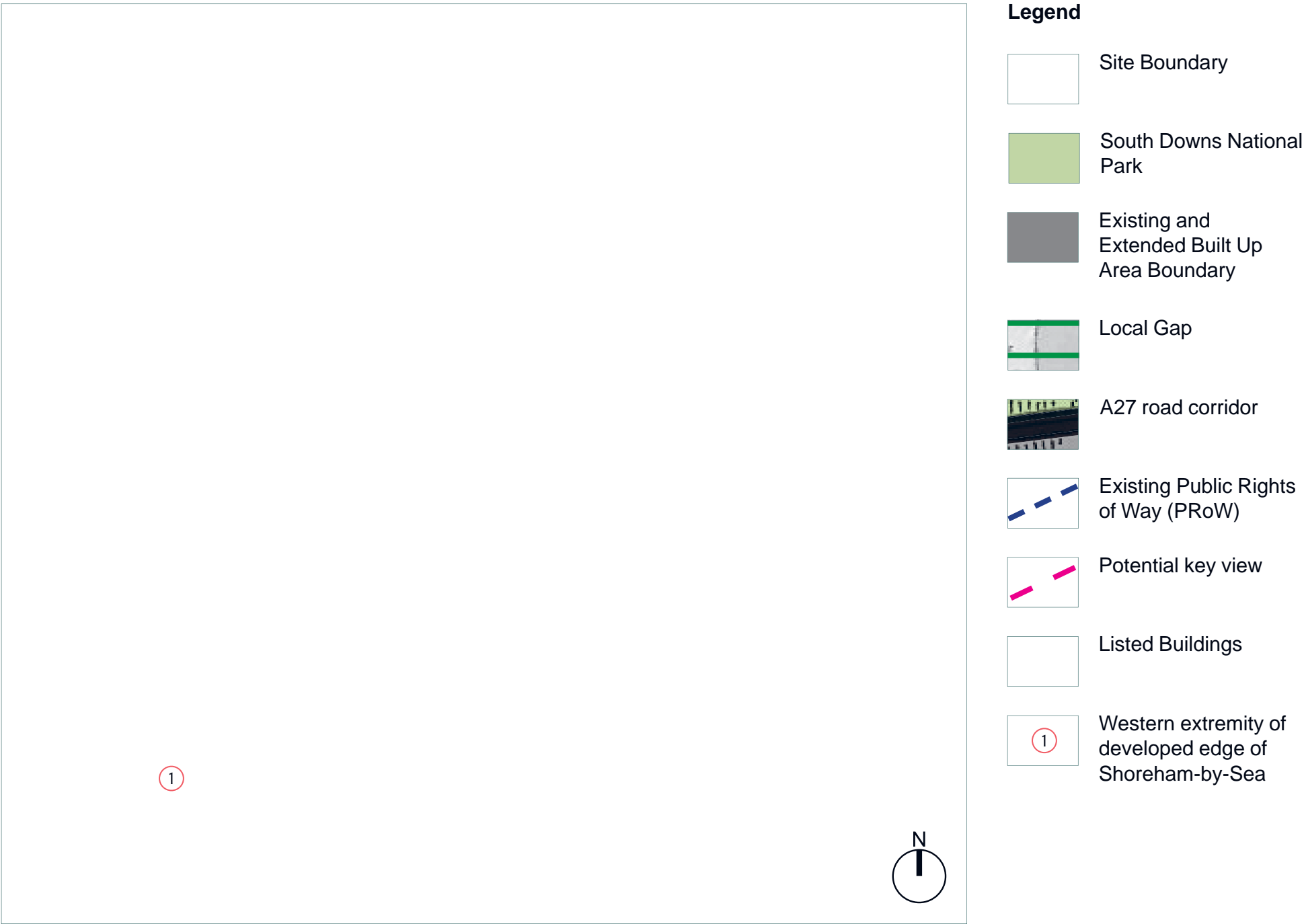


Figure 4.1 – Plan illustrating Landscape Proposals

4. Landscape Considerations and Opportunities

4.1 Landscape Considerations and Opportunities (continued)

Opportunities (continued)

- Additional planting opportunities in association with any changes to road layout to facilitate access.
- The existing Public Right of Way (footpath) along the northern and western edges of the Site could be improved to enable safer access and linkages, including to Mill Hill Nature Reserve to the north and the River Adur to the west.
- Providing public open space on parts of the Site close to the public footpaths. This would retain a partially open character to the Site and enable opportunities for planting at the development edge to soften views of built form from outlying areas, as well as providing open space for use by the community.
- The open space would also maintain separation between development and the woodland at the western and northern Site edges which forms part of a Site of Nature Conservation Interest.

5. Landscape Development Parameters and Potential Effects

5.1 Landscape Development Parameters and Potential Effects

It is considered that development could come forward on this Site as illustrated opposite, continuing the pattern of development up the valley slope and maintaining the landscape separation between Lancing and Shoreham-by Sea and thus not encroaching further to the west than the existing built up area.

It is also considered that the development of the Site in the views identified in the 'Landscape and ecological surveys of key sites within the Adur District' (November 2012) by Sheils Flynn and the Ecology Consultancy would be visible in the context of the existing developed slopes of Shoreham.

The plan opposite illustrates the potential development parameters to be explored and refined following further Site appraisal such as highways, ecology and heritage, as well as a review of quantum, building heights and open space provision. The design and layout of the development would need to consider ridgeline heights in order to set these below the existing skyline formed by the SDNP landform to the north. Design precedents of the existing Shoreham townscape are to be used as guiding principles. It is anticipated that this further detailed assessment would form part of any planning application.

We would seek to demonstrate through the design process that landscape and visual effects would be minimised. Effects of developing on greenfield land would remain and these would need to be balanced against the planning merits of any potential allocation.

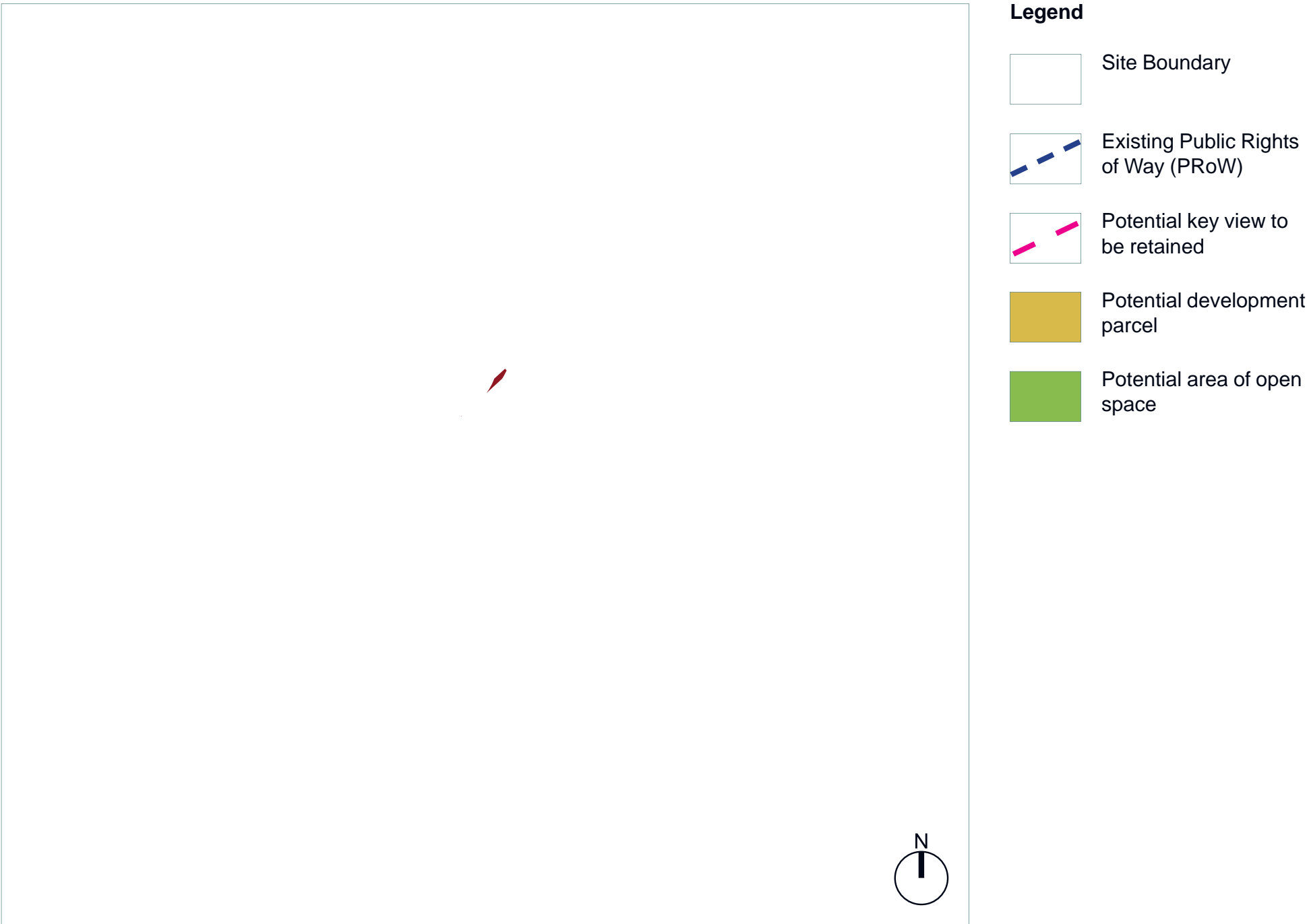


Figure 5.1 – Plan illustrating Landscape Proposals

6. Summary and Conclusions

6.1 Summary

This document has set out the potential landscape led development parameters based on both desk and field based studies. The Site is located at the north-western edge of Shoreham-by-Sea. It comprises land used for grazing of horses, bound by existing built up residential areas to the east and south. The A27 road corridor runs through a deep cutting immediately north of the Site and together with the slip roads associated with the Shoreham junction, provides a strong defensible boundary that physically separates the Site from the South Downs National Park to the north and River Adur corridor to the west.

There are several Listed Buildings in close proximity to the Site and the setting of and views from these buildings, as well as the amenity of existing residents of dwellings will be important considerations. The Site forms an area of typical settlement fringe uses, but is perceived as an integral part of the built up area. Nevertheless, it is recognised that given the sloping, south-western facing aspect of the Site, it is visible from a few elevated locations within the Downs and from the edge of the River Adur, the Shoreham Toll Bridge and from parts of the flat open landscapes west of it. The Downs are also seen in these views, given the backdrop these create to all of the existing built areas along this part of the south coast, as well as the A27 and wider existing settlement.

Given the close relationship between the Site and Shoreham, it is considered suitable for a modest amount of development where this takes into careful consideration the designated areas and buildings, and existing settlement form and setting.

A set of parameters is put forward for development that is confined to the eastern, central and southern parts of the Site, with open space provision to the west and north-west. In this way, carefully designed buildings would relate to existing settlement pattern, while maintaining openness and a green setting in the western part of the Site. The associated open space could be designed to provide wider community and habitat benefits, and could be linked to improvements to the existing generally poor quality public footpaths that run along the Site edges.

6.2 Conclusions

Whilst overall, development would lead to a partial loss of an existing greenfield Site, the contribution this makes to the wider settlement, and any perceived relationship between this land and the Downs, despite the separation by the A27, would be retained in part through the open space provision. Further exercises in layout, massing and height would further demonstrate the potential to provide a landscape sensitive residential development proposal.