

Adur & Worthing Councils
Adur Planning Policy
Portland House
44 Richmond Road
Worthing
West Sussex
BN11 1HS

11 May 2016
Ref: CB/Let/P1260ii

To whom it may concern,

**Re: Amendments to the Proposed Submission Adur Local Plan (2016)
Land at Steyning Road, Shoreham**

This letter has been prepared by ECE Planning on behalf of Cobbetts Developments Ltd in support of the promotion of the Land at Steyning Road, Shoreham (also referred to as the 'Shoreham Gateway' site) for allocation within the Adur Local Plan for future residential development.

We welcome the opportunity to provide justification in support of the allocation of the site within the Adur Local Plan. It is hoped that the information contained within this letter will enable the inclusion of the Land at Steyning Road within the Submission version of the Local Plan as it progresses towards examination.

Pre-application discussions have taken place with the Council regarding the site and a Design Panel Review has taken place. This has informed the development of proposals on the site to overcome those concerns raised by the Council and stakeholders relating, predominantly, to impact on landscape, design and flood risk.

Our client welcomes the opportunity to work proactively with Adur District Council in the promotion of the Land at Steyning Road for future residential development, helping the Adur Local Plan to reflect those requirements of the Framework.

Those representations contained within this letter, and the recommendations that it makes, focus on both the Council's evidence base in relation to the identification of a robust and justified housing need and landscape evidence base, and the strategy that is adopted to guide future residential development within the District.

Directors

Chris Barker MATP MRTPI Managing Director
Huw James MRTPI
Adam King RIBA

ECE Planning Limited
Registered in England
No 7644833
VAT No 122 2391 54
Registered Office: Amelia House
Crescent Road, Worthing BN11 1QR

The Site and Proposal – Pre application

The site (refer to Figure 1) is contiguous with the settlement boundary of Shoreham and forms a well-defined parcel of land, currently used as grazing land.

The site’s western extent is bounded by the River Adur and the A283 runs along the eastern side of the site. The raised A27 (Shoreham Bypass) and ‘Shoreham Flyover’ is located to the north of the site. An old, disused railway which forms part of the Downs Link public right of way runs along the western boundary of the site and is screened off by shrubbery.

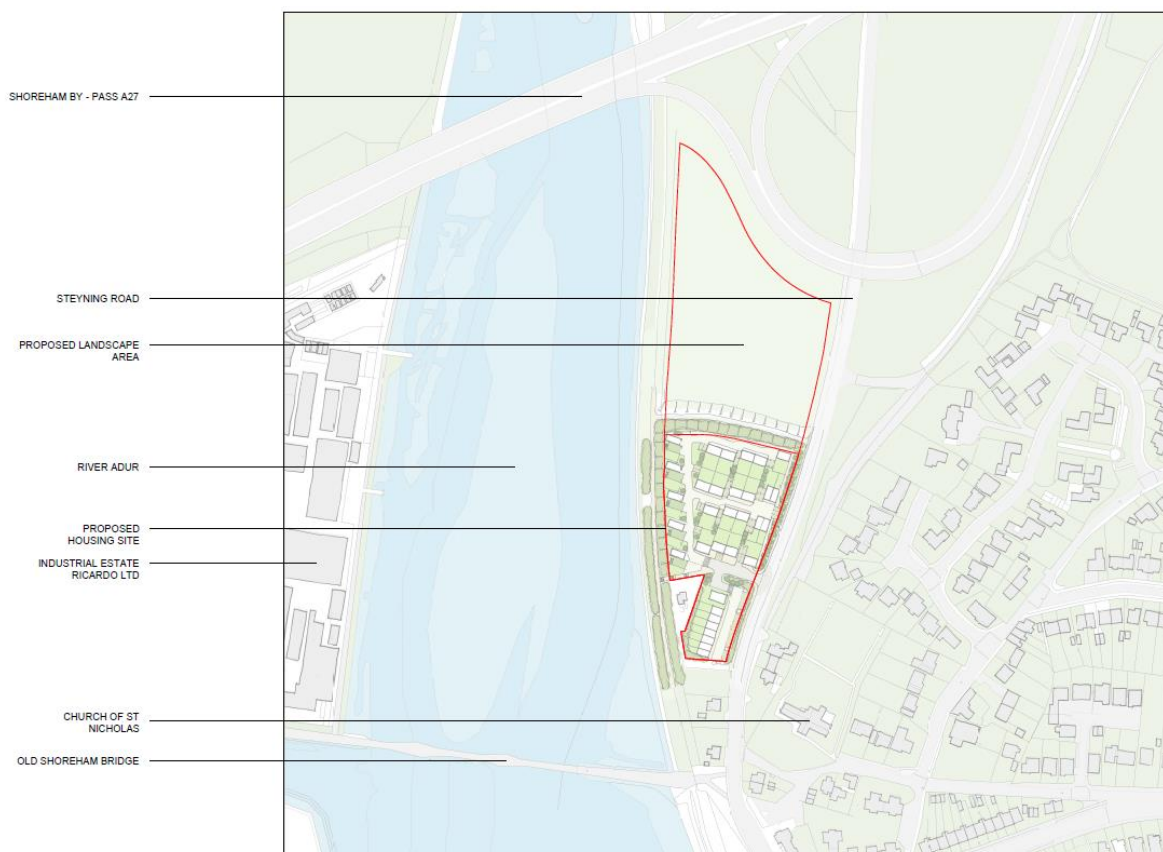


Figure 1: Land at Steyning Road

The site is close to the Grade II* listed Old Shoreham Toll Bridge and the Grade I listed St Nicholas Church is to the immediate south east of the site.

The proposal has been discussed at pre application level and presented to the Design Panel (Design South East) for critical review given its sensitive location. The scheme originally sought housing development to the south with a car sales room to the north.

The Design Panel found that:

the proposed combination of a car showroom and housing does not sit comfortably in such a location...

As such, the proposal is to be amended to retain the housing site to the south, with a proposed area of landscaping to the north in place of the proposed car sales room (refer to Figure 1). This area of landscaping is considered to mitigate the perceived impact of development on landscape and views (considered further below).

The proposed housing site will benefit from the Shoreham Adur Tidal Walls scheme, which has recently been approved by Adur Planning Committee. This scheme would deliver a flood defence on the northern and western boundaries of the proposed housing area shown in Figure 1 thus providing flood protection to the housing site.

The proposed development would deliver an appropriate scale of approximately 35 dwellings considerate of the sensitive landscape and historic environment concerns held by the Council.

Housing Need

The National Planning Policy Framework ('The Framework') and the National Planning Practice Guidance (NPPG) establish the basis against which the Adur Local Plan should be prepared, as well as those 'tests of soundness' that the emerging Local Plan must comply with.

In this regard, fundamental to the preparation and examination of the Adur Local Plan, is the identification of the objectively assessed development needs of the District, and the adoption of suitable and effective 'spatial strategy' to meet these needs. The delivery of the objectively assessed housing need should also be supported by the allocation of suitable, available and deliverable sites for future residential development.

A key element of the Adur Local Plan is setting out the strategic housing policies including a housing target and housing allocations. The current strategy for delivery of housing is a mixture of brownfield and windfall sites within the built-up-area of the existing communities (1429 dwellings) as well as the following strategic housing allocations, amended since the 2014 version of the Local Plan:

- New Monks Farm 600 dwellings
- West Sompting 480 dwellings
- Shoreham Harbour 1100 dwellings

In total, this equates to 3,609 new homes over the plan period. This is significantly lower than the updated objectively assessed housing need (OAN) of the district.

The Locally Generated Housing Needs Survey (2014) established the need within the District as 3,600 – 4,800 new dwellings over the plan period (180-240 per annum). This has since been revised through the Objectively Assessed Need for Housing: Adur District (2015) report which identified a significantly higher housing need figure of 5820 dwellings or 291 dwellings per annum.

The Adur Local Plan (2016) seeks to deliver only 3,609 dwellings over the plan period or just 180 dwellings per annum. It is clear that the amended housing target identified within the Adur Local Plan 2016 document is significantly below the housing need identified within the Objectively Assessed Need for Housing: Adur District study (2015).

The requirement for Local Planning Authorities to plan strategically for the delivery of adequate residential development to meet the locally identified housing need is explicit within the National Planning Policy Framework, which states at Paragraph 47:

To boost significantly the supply of housing, local planning authorities should:

- *use their evidence base **to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing** in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;*

The Framework is clear that Local Plans must meet the full objectively assessed housing need consistent with other policies of the Framework. Paragraph 156 of the Framework states:

Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:

- *The homes and jobs needed in the area;*
- *the provision of retail, leisure and other commercial development;*
- *the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*
- *the provision of health, security, community and cultural infrastructure and other local facilities; and*
- *climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.*

As such, the Adur Local Plan and the strategic policies it contains must seek to provide for the delivery of residential development that meets the locally identified need within the District.

The Amendments to the Proposed Submission Adur Local Plan 2016 fails to do this and is considered to be contrary to the explicit obligations contained within the Framework. Consequently, in failing to plan strategically for the delivery of adequate housing throughout the 15 year plan period, the Amendments to the Proposed Submission Adur Local Plan 2016 cannot be considered sound.

On this basis, it is considered that the additional information provided in support of the allocation of the Land at Steyning Road for future residential development, further to the Council's existing difficulties in demonstrating a robust housing land supply, provide Adur District Council the opportunity to incorporate the allocation of the site within the Submission Adur Local Plan.

Furthermore, consideration of the OAN and housing trajectory show significant reliance on Shoreham Harbour in delivery of housing in the District. The Council have identified a considerable proportion of housing coming forward at Shoreham Harbour in the medium term which is not considered to be realistic.

There are considerable concerns over the deliverability and viability of Shoreham Harbour with constraints related to infrastructure provision including:

- **Flood Defences** – the development 968 dwellings (1100 over the entire plan period) on the Western Harbour Arm will require significant investment in flood defence provision along the entire stretch of the site. There are delivery concerns related to the complex pattern of landownership and the difficulty in phasing for a flood defence to close off the entire flood cell without increasing the risk of flooding elsewhere. As set out in the Infrastructure Delivery Plan (IDP 2016) accompanying the Adur Local Plan, a significant shortfall of funding exists for flood defence provision.
- **Transport Mitigation** – the provision of high density development will have a significant impact on the transport infrastructure in the area and significant infrastructure investment, as set out in the IDP, is required. Again, a significant shortfall exists and some items such as the 'Package of site specific travel behaviour initiatives' are yet to be costed.
- **Primary Education** - The Adur IDP states that a new primary school onsite or within close proximity of the site is required yet this has not yet been identified within the plan or IDP.

In addition to the significant costs associated with infrastructure are other associated viability and deliverability considerations. Contaminated land is a significant risk for the site which could increase costs appreciably. There are also numerous businesses located on the Western Harbour Arm that would require relocating at significant cost. Land is required to achieve this relocation and there is currently no clear and robust land assembly strategy setting this out.

When considering these constraints it is hard to gauge how Shoreham Harbour can be delivered within the short - medium term as set out in the Adur Local Plan. The current housing trajectory (Figure 2 – taken from the Adur AMR 2015) shows Shoreham Harbour coming forward at the end of the 5 year period with a delivery rate of 179 homes per dwellings over a five year period.

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					Projected Completions															Totals		
	2011/2012	2012/2013	2013/2014	2014/2015	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030		2030/2031	
Gross Completions (large and small sites)	204	153	103	105	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	565
Commitments (large and small sites with planning permission)(net)					35	212	76	3	0	0	0	0	0	0	0	0	0	0	0	0	0	326
Allowance for small windfall sites					0	0	0	32	32	32	32	32	32	32	32	32	32	32	32	32	32	416
SHLAA sites 2015 (net)					0	82	67	67	75	0	0	0	0	0	0	0	0	0	0	0	0	291
Broad Location (Shoreham Harbour)					0	0	0	0	179	179	179	179	179	37	38	0	0	0	0	0	0	970
Strategic Allocation (New Monks Farm)					0	0	0	80	80	80	80	80	80	80	40	0	0	0	0	0	0	600
Strategic Allocation (West Sompting)					0	0	25	80	80	80	80	80	55	0	0	0	0	0	0	0	0	480
Total Past Completions	204	153	103	105																		
Total Projected Completions/Commitments	204	153	103	105	35	294	168	262	446	371	371	371	346	149	110	32	32	32	32	32	32	3648
Losses	11	7	10	9	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	37
Past net completions	193	146	93	96																		528
Projected net completions					35	294	168	262	446	371	371	371	346	149	110	32	32	32	32	32	32	3083
Cumulative net completions	193	339	432	528	563	857	1025	1287	1733	2104	2475	2846	3192	3341	3451	3583	3715	3847	3979	4111	4243	3611
Annualised housing target	291	291	291	291	291	291	291	291	291	291	291	291	291	291	291	291	291	291	291	291	291	5820
Monitor. Position above/below zero indicates how many dwellings above or below the cumulative allocation at any point in time	-98	-243	-441	-636	-892	-889	-1012	-1041	-886	-806	-726	-646	-591	-733	-914	-1173	-1432	-1691	-1950	-2209		
Manage. Annual requirement taking into account past/projected completions	291	296	305	317	331	350	355	369	378	372	372	372	372	375	413	474	584	768	1137	2241		

Notes

Completions include sites with planning permission but which have not commenced and sites on which development has commenced. Large sites comprise 6 or more units, small sites comprise 5 or less units. Estimated losses include actual and projected losses that may occur due to demolition, conversion and change of use. Deducting estimated housing losses from gross completion figures gives net completions. Source: 2015 Residential Land Availability Survey, WSCC. To view source data search WSCC planning data for Housing and Residential Land in West Sussex.

Figure 2: Housing Trajectory (Adur AMR 2015)

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It is considered that this high level of annual completions of predominantly flatted development is not reasonable in the short to medium timescales.

Such a level of development would flood the local market for flatted development over a short period of time and would therefore be unattractive for any developer.

Given the above constraints, it is highly unlikely that the site will be developed in the short – medium term with delivery only likely to come forwards at the end of the plan period.

It is considered that the Land at Steyning Road could aid in housing delivery in the short – medium term (dependant entirely upon the timescales for the delivery of the Adur Tidal Walls – a scheme, it should be added, which is much further advanced than the flood defence strategy for the Western Harbour Arm). This would significantly aid the Council in delivery of housing to fill the significant gap that is likely to be created by delivery of Shoreham Harbour in the latter part of the plan period and realistically beyond this.

In this respect, the Adur Local Plan, as currently drafted, cannot be considered to be *effective* in terms of being deliverable over its period or *justified* when considered against reasonable alternative options for development. On this last point, other sites in the district have potential to be delivered with less impact / infrastructure provision than development of Shoreham Harbour and can come forward earlier in the plan period.

Flood Risk

This site will be located within flood zone 3a once the Adur Tidal Walls is implemented. As such, the site will be at the same flood risk as other residential sites being considered for development within the area (Ropetackle North, Shoreham Harbour).

Concern has been raised regarding surface water and groundwater flooding. It is our view that a technical solution to overcome these concerns is possible and is currently being investigated by our clients. Similar flood risk is experienced on other sites in the area (such as the Ropetackle North site).

The Sequential Test accompanying the Adur Local Plan requires updating. It refers to the site being located within flood zone 3a and 3b. It makes no mention of the Shoreham Adur Tidal Walls Scheme and the protection this would provide over the plan period. This requires amending and updating along with the Sustainability Appraisal.

Landscape

The *Adur Local Plan Assessment of landscape sensitivity – Adur Local Plan area report (2016)* identified the site as having a medium – high landscape sensitivity. The update report has escalated the sensitivity of the site significantly from the original *Landscape and ecological surveys of key sites within the Adur District Report (2012)* which identified the site as having a low – medium landscape character.

The two studies were produced by the same consultant using the same methodology.

As such, it is apparent that two changes within the update report (2016) may have caused such an escalation. Firstly, the enlargement of the site to include the river Adur Estuary and the Ricardo Employment Site (refer to Figures 3 and 4) and secondly the perceived impact that the Adur Tidal Walls riverside defence will have.

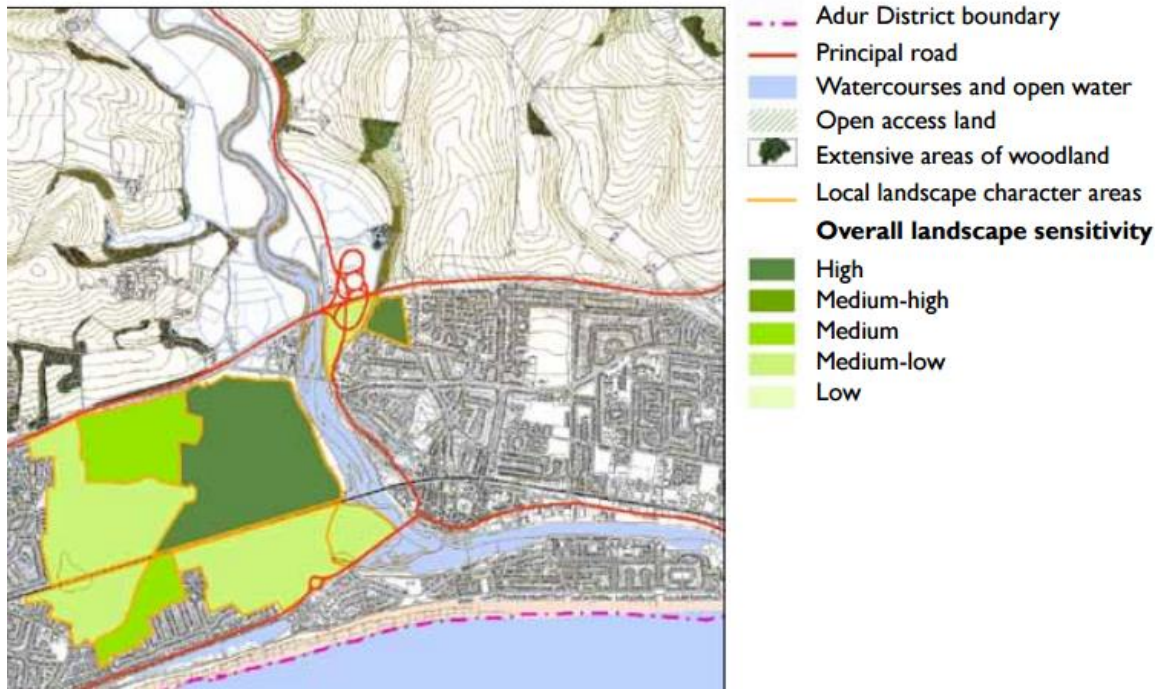


Figure 3: Landscape Study (2012) Character Areas

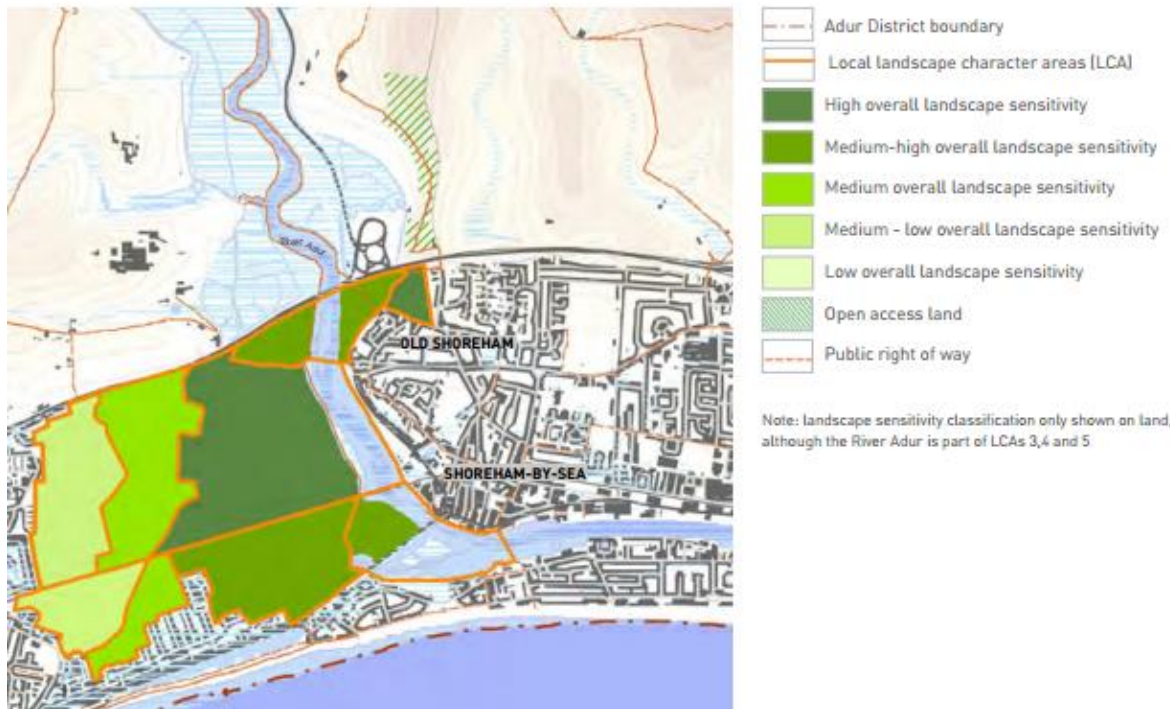


Figure 4: Landscape Study Update (2016) Character Areas

Figure 5 displays the difference in assessment outcomes for the character areas between the 2012 study and 2016 update.

	Landscape Study 2012	Landscape Study Update 2016
Landscape Character Sensitivity	Medium - low	Medium
Visual Sensitivity	Medium - low	Medium - high
Overall Landscape Sensitivity	Medium - low	Medium - high

Figure 5: Landscape Study Assessment Status for Land at Steyning Road Site

Landscape Character Sensitivity

In relation to Landscape Character Sensitivity, there has been no change in the landscape makeup of the Land at Steyning Road since the two studies have been carried out. In this sense, the 2012 study noted that the site was of:

...poor condition, with a mix of temporary fencing, horse stables, water troughs etc.

It is clear however that the Adur Tidal Walls intervention will impact on the site. It is our view that to some degree, the provision of a large, engineered and clearly man made flood defence structure in an otherwise natural landscape environment will have an urbanising impact on the character of the area. This would diminish the importance and sensitivity of the landscape, although these specific points have not been acknowledged by the Council.

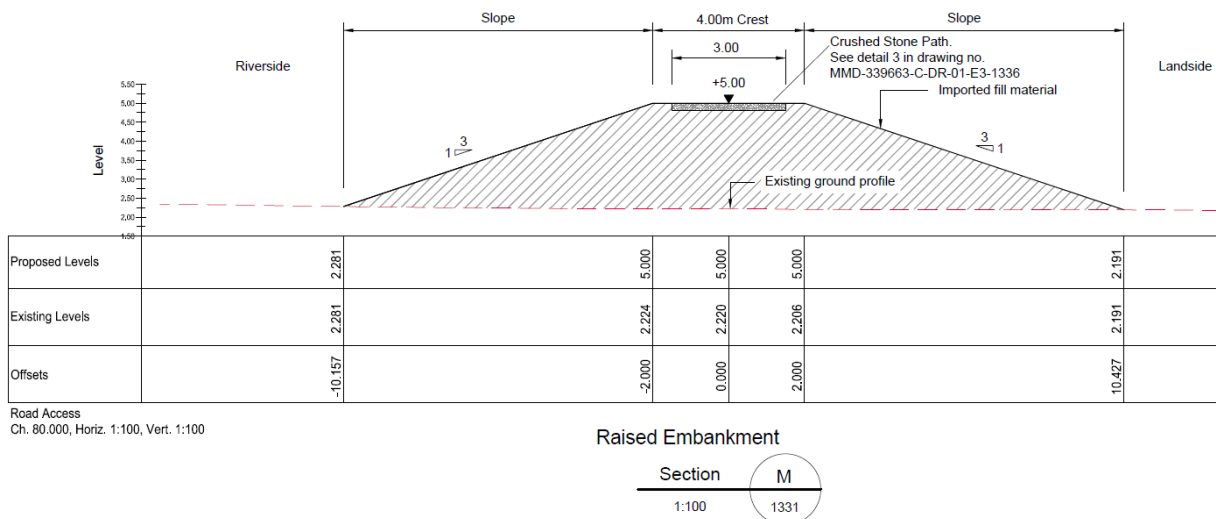


Figure 6: Adur Tidal Walls Flood Defence - Northern Boundary of Site

The defence running on the northern side of the site is a significant structure. It is in excess of 20 metres wide and will be in excess of 2.5m in height along its crest (refer to Figure 6). Flood defences on the riverside are, in places, 1.5m higher than the existing levels with the new defence measuring in excess of 15m wide in places.

It is our view that the landscape here is already compromised by the residential development to the south and east and the elevated A27 to the north. The soon to be implemented tidal flood defence scheme including raised A283 Steyning Road can only have a further urbanising impact upon the site. This may be diminished to some degree by proposed planting (discussed below).

It remains our view that the Tidal Walls intervention can only downgrade the landscape character and quality rather than raise it.

It must therefore be assumed that the change in status from medium – low landscape character sensitivity to medium sensitivity is due to the artificial inclusion of the river Adur Estuary / Ricardo site within the character area.

When the Landscape Study was undertaken in 2012, the River Adur would have formed part of the assessment of the site being located on its border. The image of the site within the 2012 study Technical Appendix (refer to page 19) clearly shows the site in the context of the river and the Adur is repeatedly referred to throughout.

The updated 2016 assessment is considered to misconstrue the landscape value of the site and artificially inflate it by including other landscape areas such as the estuary itself (even though its presence would have formed part of the 2012 assessment). As such, the Landscape Character Sensitivity of the Land at Steyning Road can only be considered to be of medium – low sensitivity status as set out in the 2012 report.

Visual Sensitivity

In relation to visual sensitivity, this has increased significantly from the 2012 assessment of medium – low to the 2016 assessment of medium - high. The only change associated with the site (other than the artificial landscape character boundary change) is the approved Adur Tidal Walls scheme and the perceived increased opportunity for viewing the site at close range from the Downs link public right of way.

It is understood that, contrary to the 2016 update report, scrubland on the river banks will be replaced as shown by the areas of planting for reach E3 in the Adur Tidal Walls planning application (as approved). '*Native shrub or woodland mix*' proposed planting is shown on both sides of the footpath and upon the bund on the northern section of the site (refer to drawing MMD-339663-L-DR-03-E3-1381- *Shoreham Adur Tidal Walls Landscape Proposals E3 - Old Railway General Arrangement Sheet 1 of 4*).

It would therefore be fair to assume that visibility in terms of longer distance views from the riverside level and from some more elevated positions from the west and from the north will be reduced. This is due to the height of the defence and due to the significant woodland planting proposed by the Tidal Walls scheme.

From close range, i.e. the Downs Link public right of way, the viewer will indeed be elevated and potentially have views into the site. However, this is not guaranteed again due to the significant amount of woodland planting proposed on the easternmost side of the defence.

The Landscape Study 2016 update states:

The Adur Tidal Walls Scheme will change the relationship of this landscape character area to the River Adur because the tall hedgerow/scrub vegetation along the riverside path is likely to be removed to construct a higher flood embankment. The riverside path (the Downs Link) will run along the crest of the bund. As a result, the fields alongside the path are likely to become more visible and their role as part of the wider landscape setting of the River Adur will be enhanced. As the only undeveloped part of the Adur floodplain within the Lancing-Shoreham Gap, this is a highly sensitive riverside meadow landscape, which is vulnerable to change.

We strongly object to this assertion in relation to the Land at Steyning Road. It assumes that there will be increased visibility of the site taking no account of the negative impact of a raised defence and proposed planting on longer views. In relation to closer range views, when fully established, the woodland planting is likely to provide significant screening.

Subsequently, it is our view that visibility will be decreased and visual sensitivity must also be reduced. The methodology of the landscape reports are clear on the point of how visual sensitivity is assessed:

The assessment of visual sensitivity is based on the general visibility of the landscape, the number and type of viewers and the potential scope to mitigate the visual effects of any change that might take place.

The change in the overall status from medium – low to medium -high cannot therefore be justified for the Land at Steyning Road site.

In summary, we object to the Landscape Study 2016 update and strongly argue the evidence base underpinning the Local Plan 2016 is not considered to be sound.

It is also our view that the Landscape Study 2016 requires updating based on our comments and subsequently the Sustainability Assessment of the Local Plan would similarly require updating before the plan can progress towards Submission.

Other Landscape Considerations

A further site specific study produced by the Council (*Adur Landscape Study Update - Shoreham Gateway Landscape and visual appraisal of development proposals (2016)*) found that the previous proposal (including commercial element) would be unacceptable with no mitigation possible.

This assessment has been made on the predication of development at other Strategic Sites within the district (including the Shoreham Airport employment allocation within an area of high landscape sensitivity). These sites have not yet been allocated and therefore the assessment is premature. Furthermore, the Allen Scott Landscape and Visual Impact Assessment (2014) in support of the site found that that development in the location would be acceptable.

Furthermore, the proposed loss of the commercial unit would significantly alter the impact of development in this location. The site area identified for housing development is shown overlaid on the Adur Landscape Study update (2016) character area in Figure 7 to illustrate the reduced size of the site and the large fingers of green space to be retained to the north. As such, the provision of proposed landscaping to the north will enhance and mitigate the perceived impact that development would have, retaining the sequence of gateway views considered to be of importance.



Figure 7: Site in context of landscape character areas

Significant work has been undertaken following Design Panel review to reduce the impact that the housing element would have on the area. Ongoing design work is identifying more perforate development layouts to retain visibility through and across the site, although as mentioned previously, this will be significantly altered by the Adur Tidal Walls flood defence.

On the basis of the 2012 Landscape Study conclusions, the site is the same overall landscape sensitivity as the New Monks Farm allocation (and indeed scores more positively than other proposed allocations in the district such as West Sompting). In this context, the site is not considered to be sacrosanct should a sensitively designed and high quality scheme be put forward that respects the existing context.

Conclusion

As set out this letter, it is our considered view that the Amendments to the Proposed Submission Adur Local Plan 2016 and the updated evidence base that supports it is not considered to be sound as assessed against the provisions of the Framework. It is also considered that the plan does not meet the following tests of soundness:

- **positively prepared** – not meeting the objectively assessed housing need
- **justified** – not being the most appropriate approach when compared to reasonable alternatives (i.e. delivery of housing at Land at Steyning Road)
- **effective** – not being deliverable over the plan period (i.e. reliance on Shoreham Harbour)

Our client is keen to proactively and positively explore the residential development of the land at Steyning Road and discuss solutions to overcome the remaining physical constraints.

The key environmental issues such as those relating to landscape can be overcome through suitable design and appropriate mitigation measures as set out above. Furthermore, the site is considered to represent only a small incursion within the landscape and the impact is considered acceptable.

A technical solution to flood issues is currently being considered.

We therefore hope that Adur District Council will reconsider their housing needs position and decision not to allocate the Land at Steyning Road for residential development and engage proactively and positively in bringing the site forward in the Submission Adur Local Plan as a housing allocation to meet the locally identified housing need arising in the District.

We wish to be kept fully informed in relation to the future progress of the Adur Local Plan and request to make formal representations at the Examination in Public.

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If you have any further queries or require further information please contact me on 01903 248777.

Yours sincerely
ECE Planning



Chris Barker MATP MRTPI
Director