

Proposed Submission Adur Local Plan (2016) West Sussex County Council response

The Proposed Submission Adur Local Plan (2016) sets out a strategy for development in Adur up to 2031, seeking to achieve a balance in meeting needs for development while striving to protect and enhance the character and features of Adur. Amendments have been made to:

- address some matters raised in representations made during the statutory publication period for the Proposed Submission Adur Local Plan 2014, including proposed changes to the strategic site allocation at New Monks Farm;
- update information;
- reflect recent changes in government policy; and
- clarify text and to correct drafting errors.

Following the current period for representations under Regulation 19 of the 2012 Town & Country Planning (Local Planning) (England) Regulations, Adur District Council is intending to submit the Local Plan to the Secretary of State in July 2016. A public examination heard by an independent Planning Inspector is expected to be held in October 2016.

This note sets out officer level comments upon the proposed submission documents, highlighting key issues and suggesting changes the County Council is requesting be made to the Local Plan prior to its adoption by Adur District Council.

Education

The District Council proposes to remove '*education*' from para 1.34 of Vision 4. This is still a priority area to consider as new or improved infrastructure, either on or off site, is needed to meet the needs arising from development proposed in the Local Plan. We support the additional wording at para 3.29 which sets out that Adur District Council and the County Council are working together to address the need for suitable education provision in the Shoreham area, arising from growth. Innovative solutions may include shared facilities on Shoreham Harbour and it is important that policies in the Local Plan are capable of securing the necessary infrastructure, so we request that '*education*' be mentioned in Vision 4.

The District Council proposes to include a reference to potential for future expansion of the primary school on the New Monks Farm site which the County Council supports as this will provide flexibility to expand the school if this is required in the future. There is a need for contributions towards education provision from both the New Monks Farm and West of Sompting sites to cater for children of all ages. The primary school is required on the New Monks Farm site to accommodate the primary education needs arising from both the strategic sites. Therefore the wording; "*A financial contribution towards the provision of education facilities*", should also be added to the education bullet point in Policy 5.

As outlined in the IDP and in previous comments, education provision is required to meet the needs from development, a further primary school site may be required as part of the Shoreham Harbour strategic site allocation. The need for a site will depend on the capacity available to expand existing schools in the local area. It was requested that under paragraph 6 of Policy 8, the following additional wording was added; "*Educational provision will be considered and suitable provision offsite or onsite will be provided*". Wording has been added, however, it does not imply that the development is required to provide or contribute to suitable provision of facilities. We therefore request that the last sentence in paragraph 6 of policy 8 is amended to read; "*Suitable education provision will also be provided*".

Changes to para 4.29 in the supporting text of Policy 21 have been made, to reflect the expected need for smaller dwellings in the future, including the provision of smaller family sized dwellings as part of a high density development at Shoreham Harbour. However, the policy has not been changed and the use of '*housing*' and '*flatted development*' implies that only the town centre development should be delivering higher density flatted developments. As there are limited opportunities to provide new or improved education facilities in the Shoreham area, there is a need to ensure the child product from new development does not exceed the number of school places which can be provided. In order to facilitate the proposed development, it has been assumed that development at Shoreham Harbour will be largely '*flatted development*' which has a lower child product than housing. Therefore, we request the addition of Shoreham Harbour to the second bullet point.

Flood risk

The County Council, in its role 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 District Council following earlier detailed comments made in the preparation of the Local Plan.

The County Council 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 a housing level of 600. The County Council reviewed the submitted evidence and found no reason why the sites would not meet the Sequential and Exception Tests. The District Council will need to be satisfied that any flood risk due to the additional landfill/land raise that will reduce the flood plain in the area can be sufficiently mitigated. The County Council will continue to work with and advise the District Council on the site specific flood risk assessment elements of the exceptions tests for all allocated sites.

The Lancing Surface Water Management Plan (SWMP) was produced in 2015 to understand the causes of flooding and identify any capital improvements or ongoing maintenance needed to reduce the impacts of flooding to people and infrastructure. The SWMP is an important evidence-based document and gives a

better understanding of local flood mechanisms and provides technical recommendations for local flood risk management. It is welcomed that it has been referenced in the revised Adur Local Plan.

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 off site flood risk.

All technical evidence relating to flood risk on proposed site allocations within the Local Plan should be considered and published when the Local Plan is submitted for examination.

Heritage

The amendments made by the District Council to the Draft Local Plan and Policies Map in response to previous comments are supported.

Minerals and Waste

We support the changes made to footnote 5 on page 4, para 1.20 and 2.100 in response to previous comments.

As set out in previous comments, paragraph 1.7 refers only to safeguarded mineral site allocations and resources. However, the West Sussex Waste Local Plan 2014 also safeguards allocated sites and permitted capacity for waste management. Paragraph 1.7 should be amended to read; *"West Sussex County Council is responsible for preparing statutory land use plans for minerals and waste. Adopted sites have been identified and safeguarded in the West Sussex Minerals and Waste Local Plans. Proposals for development should have regard to the defined County Minerals Safeguarding Areas and Minerals Consultation Area guidance and policy produced by West Sussex County Council. The Waste Local Plan safeguards allocated waste sites and permitted capacity for waste management. Preparation of site plans will require liaison with West Sussex County Council at an early stage to ensure that any potential minerals and waste interests are fully considered in planning development."*

The change requested to footnote 8 has been made, however the amended plan still shows a footnote which is repeated on the next page. The footnote relates to the Adur Local Plan and links to para 1.25 on the following page, it is therefore suggested the footnote on page 6 is removed to avoid confusion.

Paragraph 2.100 needs to be amended to remove the last sentence, which makes reference to guidance, which is not being prepared, in order to ensure the document is factually correct.

Rights of Way

Considering the previous comments made we support the addition of text to para 4.74 to ensure that; *"New pedestrian and cycle networks should integrate*

with existing routes as far as possible." relates to all sites and reflect Key Issue 7 and Vision and Objective 8 of the Plan. However, we again request that; *"Access across the A27 to the South Downs National Park for pedestrians, cyclists & equestrians must be retained and where possible, enhanced"*, is added to Policy 6 and its supporting text due to the importance of sustainable travel and linkages.

Transport

West Sussex County Council has continued to support the additional transport work undertaken. The County Council has worked collaboratively to inform the Adur Local Plan and Shoreham Harbour Transport Study and on the basis of a technical assessment of the work carried out, supports its conclusions. There is reasonable 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. This is subject to further work on the design and capacity testing of a joint access junction on the A27 for the New Monks Farm and Shoreham Airport sites, and replacing the existing signal controlled junction of the A27 at Coombes Road with alternative provision for pedestrians and cyclists.

Policy 8 paragraph 10 has been amended, it is requested that a further change is made to add 'and must not prejudice' into the last sentence so that it reads; *"Development in this location should contribute and must not prejudice the delivery of measures identified in the Transport Strategy."*

It is suggested that '(2014)' is removed after 'Shoreham Harbour Transport Strategy' in para 2.101 so that any updates are considered by developers and the Local Plan does not date unnecessarily.

S106/CIL/Planning conditions references in policies

The strategic site policy references how infrastructure is expected to come forward but this excludes reference to the use of S278 agreements, which are likely to be used to secure developer contributions. This is particularly relevant to delivery of a new roundabout on the A27 which, based on experience elsewhere in the County, may be more appropriately secured through a S278 agreement.