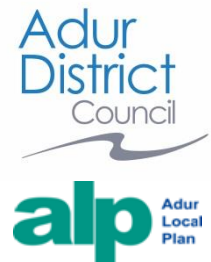


Proposed Submission Adur Local Plan 2014



Representation Form

Return Address:

planning.policy@adur-worthing.gov.uk


Or:

Planning Policy Team, Adur and Worthing Councils, Town Hall, Chapel Road,
Worthing, BN11 1BR

Or hand in at:

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- Portland House, 44 Richmond Road, Worthing, BN11 1HS

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- Part B - Your representation(s). Please fill in a separate sheet for each representation you make.

It is recommended that you read the Guidance Notes provided for an explanation of terms used in this form.

Part A – Personal Information
You only need to complete this section once

Personal Details

First name	<input type="text" value="Paul"/>		
Last name	<input type="text" value="Roelich"/>		
Organisation (where applicable)	<input type="text" value="New Monks Farm Development Ltd"/>		
Address line 1	<input type="text" value="Sinon House"/>		
Address line 2	<input type="text" value="The Hyde Business Park"/>		
Address line 3	<input type="text" value="Brighton"/>		
Post Code	<input type="text" value="BN2 4JE"/>	Telephone	<input type="text" value=""/>
Email address	<input type="text" value=""/>		

Agent's Details (if applicable)

First name	<input type="text"/>		
Last name	<input type="text"/>		
Organisation	<input type="text"/>		
Job Title	<input type="text"/>		
Address line 1	<input type="text"/>		
Address line 2	<input type="text"/>		
Address line 3	<input type="text"/>		
Post Code	<input type="text"/>	Telephone	<input type="text"/>
Email address	<input type="text"/>		

Part B – Representation

Please use separate sheets for each representation

1. Which part of the Adur Local Plan does this representation relate to?

Policy No.	<input type="text" value="Policy 7"/>	Paragraph No.	<input type="text"/>
Map	<input type="text"/>	Other section (please specify)	<input type="text"/>

2. Do you consider the Adur Local Plan to be: (tick as appropriate)

2.1 Legally Compliant Yes No

2.2 Sound Yes No

Please read the Guidance Note for guidance on legal compliance and soundness.

If you have ticked no to 2.1, please continue to Q4.

If you have ticked no to 2.2, please continue to Q3.

If you have ticked yes to 2.1 and 2.2 please go to Q7.

3. Do you consider the Adur Local Plan to be unsound because it is not: (tick as appropriate)

3.1 Positively Prepared

3.2 Justified

3.3 Effective

3.4 Consistent with National Policy

4. If you consider the Adur Local Plan to be unsound or not legally compliant, please explain why in the box below:

Please refer to report attached dated 1st December 2014

(Continue on a separate sheet if necessary)

5. Please explain in the box below what change(s) you consider necessary to make the Adur Local Plan legally compliant and sound having regard to the reason you identified above.

(You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested or revised wording of any policy or supporting text. Please be as precise as possible).

(Continue on separate sheet if necessary)

6. If your representation concerns soundness or legal compliance and is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination? (tick as appropriate)

No, I wish to communicate through written representations

Yes, I wish to speak to the Inspector at the hearing sessions

Please note: The Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the hearing part of the examination.

7. If you wish to participate at the hearing part of the examination, please outline why you consider this to be necessary.

New Monks Farm is one of the strategic sites within the Local Plan. It is important that the policies relating to the site render it developable and deliverable. Our attendance at the hearing is important in order to consider these matters with the Inspector.

8. Please tick if you do not wish to be informed of the following:

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Published

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What happens next?

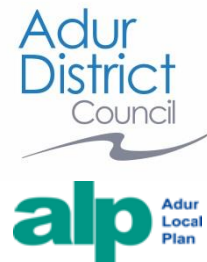
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Interested parties will be informed of the start date of the hearing sessions and the matters to be considered.

Thank you for making representations.

Proposed Submission Adur Local Plan 2014



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Part A – Personal Information
You only need to complete this section once

Personal Details

First name	<input type="text" value="Paul"/>		
Last name	<input type="text" value="Roelich"/>		
Organisation (where applicable)	<input type="text" value="New Monks Farm Development Ltd"/>		
Address line 1	<input type="text" value="Sinon House"/>		
Address line 2	<input type="text" value="The Hyde Business Park"/>		
Address line 3	<input type="text" value="Brighton"/>		
Post Code	<input type="text" value="BN2 4JE"/>	Telephone	<input type="text" value="01273 699937"/>
Email address	<input type="text" value="paul@roelich.co.uk"/>		

Agent's Details (if applicable)

First name	<input type="text"/>		
Last name	<input type="text"/>		
Organisation	<input type="text"/>		
Job Title	<input type="text"/>		
Address line 1	<input type="text"/>		
Address line 2	<input type="text"/>		
Address line 3	<input type="text"/>		
Post Code	<input type="text"/>	Telephone	<input type="text"/>
Email address	<input type="text"/>		

Part B – Representation

Please use separate sheets for each representation

9. Which part of the Adur Local Plan does this representation relate to?

Policy No.	<input type="text" value="Policy 5"/>	Paragraph No.	<input type="text"/>
Map	<input type="text"/>	Other section (please specify)	<input type="text"/>

10. Do you consider the Adur Local Plan to be: (tick as appropriate)

- 2.1 Legally Compliant Yes No
- 2.2 Sound Yes No

Please read the Guidance Note for guidance on legal compliance and soundness.

If you have ticked no to 2.1, please continue to Q4.

If you have ticked no to 2.2, please continue to Q3.

If you have ticked yes to 2.1 and 2.2 please go to Q7.

11. Do you consider the Adur Local Plan to be unsound because it is not: (tick as appropriate)

- 11.1 Positively Prepared
- 11.2 Justified
- 11.3 Effective
- 11.4 Consistent with National Policy

12. If you consider the Adur Local Plan to be unsound or not legally compliant, please explain why in the box below:

Please refer to report attached dated 1st December 2014

(Continue on a separate sheet if necessary)

13. Please explain in the box below what change(s) you consider necessary to make the Adur Local Plan legally compliant and sound having regard to the reason you identified above.

(You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested or revised wording of any policy or supporting text. Please be as precise as possible).

(Continue on separate sheet if necessary)

14. If your representation concerns soundness or legal compliance and is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination? (tick as appropriate)

No, I wish to communicate through written representations

Yes, I wish to speak to the Inspector at the hearing sessions

Please note: The Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the hearing part of the examination.

15. If you wish to participate at the hearing part of the examination, please outline why you consider this to be necessary.

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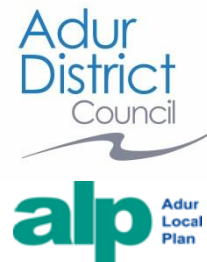
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Thank you for making representations.

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Last name	<input type="text" value="Roelich"/>		
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Address line 3	<input type="text"/>		
Post Code	<input type="text"/>	Telephone	<input type="text"/>
Email address	<input type="text"/>		

Part B – Representation

Please use separate sheets for each representation

17. Which part of the Adur Local Plan does this representation relate to?

Policy No.	<input type="text" value="Policy 14"/>	Paragraph No.	<input type="text"/>
Map	<input type="text"/>	Other section (please specify)	<input type="text"/>

18. Do you consider the Adur Local Plan to be: (tick as appropriate)

- 2.1 Legally Compliant Yes No
- 2.2 Sound Yes No

Please read the Guidance Note for guidance on legal compliance and soundness.

**If you have ticked no to 2.1, please continue to Q4.
If you have ticked no to 2.2, please continue to Q3.
If you have ticked yes to 2.1 and 2.2 please go to Q7.**

**19. Do you consider the Adur Local Plan to be unsound because it is not:
(tick as appropriate)**

- 19.1 Positively Prepared
- 19.2 Justified
- 19.3 Effective
- 19.4 Consistent with National Policy

20. If you consider the Adur Local Plan to be unsound or not legally compliant, please explain why in the box below:

Please refer to report attached dated 1st December 2014

(Continue on a separate sheet if necessary)

21. Please explain in the box below what change(s) you consider necessary to make the Adur Local Plan legally compliant and sound having regard to the reason you identified above.

(You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested or revised wording of any policy or supporting text. Please be as precise as possible).

(Continue on separate sheet if necessary)

22. If your representation concerns soundness or legal compliance and is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination? (tick as appropriate)

No, I wish to communicate through written representations

Yes, I wish to speak to the Inspector at the hearing sessions

Please note: The Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the hearing part of the examination.

23. If you wish to participate at the hearing part of the examination, please outline why you consider this to be necessary.

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Thank you for making representations.

PROPOSED SUBMISSION ADUR LOCAL PLAN 2014

REPRESENTATIONS ON BEHALF OF NEW MONKS FARM

Contents

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2 Changes to Policy 5 New Monks Farm	3
3 Changes to other relevant policies	4
4 Why the Submission Adur Local Plan is not Sound	4
5 Viability Assessment	6

Appendix 1 Representations on Revised Draft Adur Local Plan 2013.

1st December 2014

1 BACKGROUND

- 1.1 These submissions are made on behalf of the landowner of New Monks Farm (NMF). Representations to the Revised Draft Adur Local Plan were outlined in a letter dated 7th November 2013 and are attached as **Appendix 1**. Comments were directed to RD Policy 5 New Monks Farm (NMF) including Map 4, RD Policy 7 Shoreham Airport including Map 7, RD Policy 13 Adur's Countryside and Coast, all references to Shoreham Airport proposed access to A27 within the Draft Local Plan and all references to Green Gaps within the Draft Local Plan.
- 1.2 The November 2013 representations raised a number of concerns on the soundness of the above policies and a summary of these with reference to NMF are set out below:
- **RD Policy 5 New Monks Farm and Map 4.** There was general support for the policy and the range of proposed development uses.
 - Whilst there was no objection to providing a Landscape/Green Infrastructure Strategy - this is referenced in the policy with limited, if any, mention of it within the supporting text.
 - The Preliminary Ecological Appraisal 2012 for the site states that it is not subject to any statutory or non-statutory nature conservation designations. There was concern that this part of the policy was not clear about the elements that are to be protected and/or enhanced and why.
 - Para 2.57 within the draft Local Plan stated that the most important biodiversity habitats are the network of streams and ditches. Support is given only to the references made to the streams and ditches being safeguarded and enhanced.
 - Objection was raised to the reference to development respecting the landscape of the Lancing-Shoreham by Sea Local Green Gap (see below). The essence of a Green Gap (to which an objection was made) is to prevent towns coalescing. It is not a landscape based policy.
 - Whilst there was support for a school being located at NMF, this is subject to the Council proving the need for it, how it will be funded and importantly, how and when it will be delivered.

- An objection was raised to the current wording of 'a Country Park and informal recreation' and a request was made that this is amended to 'a Country Park, informal and potentially formal recreation'.
- An objection was raised to all references to Green Gaps within the Draft Local Plan.
- An objection was raised to all references to an improved access to the A27 at the Airport.

2. CHANGES TO POLICY 5 NEW MONKS FARM

2.1 It is noted that Policy 5 has been amended following representations to the Draft Local Plan version. However, the concerns outlined in the submissions dated November 2013 have not been taken into account in any substantive way although the following are noted:

- Reference to development respecting the landscape of the Lancing – Shoreham-by-Sea Local Green Gap and the South Downs National Park has been amended to read:
Development must respect the landscape of the surrounding countryside and the South Downs National Park.
- It is also noted that amendments have been made to Map 2 to remove the annotations within the site. The Country Park area is not included within the key but is situated within the countryside policy area.

3. CHANGES TO OTHER RELEVANT POLICIES

3.1 It is noted that changes to the Shoreham Airport Map 4 have been made and the roundabout option is not shown. However, changes to the policy relating to the need for new access arrangements onto the A27 from the airport in order to serve the proposed development have not changed.

3.2 With regard to paragraph 2.77 - whilst it has been changed to provide preference to the roundabout access to New Monks Farm, this still remains confusing and does not provide clarity as to the option that will be delivered.

3.3 It is noted that a new policy - Policy 14 Local Green Gaps has been introduced.

4. WHY THE SUBMISSION ADUR LOCAL PLAN IS NOT SOUND

4.1 The NPPF states that to be sound, a local plan 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.

4.2 Due to the provisions within Policy 5 on NMF, Policy 7 on Shoreham Airport and Policies 13 and 14 on Adur's Countryside and Coast/Local Green Gaps, the Plan is not *justified or consistent* with national policy for the following reasons:

The Plan is not Justified

- 4.3 The Local Plan contains Policy 7 on Shoreham Airport. Whilst Map 4 does not show a new junction or roundabout to the Airport, the policy states that significant improvements will be required on the A27 Sussex Pad junction to accommodate new development. Paragraph 2.77 also states that an alternative access (a new roundabout at the Sussex Pad junction) is retained as a contingency option. We consider that insufficient supporting evidence has been provided to support this and the option has not been progressed to demonstrate that it is a deliverable or effective safe solution. This is in contrast to the westerly proposal positioned on land at New Monks Farm, which is well advanced with the Highways Agency and deliverable from both a land ownership and technical perspective. We therefore retain our original objection to all references within the Local Plan to an improved access to the A27 at the Airport as this is not a justified strategy.
- 4.4 With regard to Policy 5 on New Monks Farm, no justification has been given for the need for a school and how the development of such will be managed and delivered. There is no detail on why NMF is the right location for a school, the nature of the organisation(s) likely to develop the school nor is there a contingency in place for the future of land reserved for the school should it not come forward. The policy should refer to dual use of playing fields and the opportunities for formal recreational space provided by the school. On this basis, we do not consider the school proposal to be justified.

The Plan is not consistent with National Policy

- 4.5 The Local Plan contains elements that are not consistent with national policy. Where this has happened, there is no sound rationale for departing from national policy.
- 4.6 The concern is that the Plan still refers to Local Green Gaps (Policy 14). These types of policies are no longer supported within the National Planning Policy Framework. Paragraph 76 of the NPPF states that local communities, through local and neighbourhood plans, should be able to identify for special protection green areas of particular importance to them. The NPPF does not support the retention of Local Green Gaps. The area within which

the proposed Country Park sits should be defined as Local Green Space as set out in the NPPF. Allocating the entire Green Gap as a Local Green Space is not appropriate and not in line with the NPPF. The NPPG covering Local Green Space designation states that this should only be used where the green area concerned is not an extensive tract of land. Consequently blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name

- 4.7 Our view is that formal recreation is an appropriate use within a Local Green Space and the Country Park should be designated as such. The supported uses should therefore include formal and informal recreational. Should the Council wish to retain the Local Green Gap policy and the Countryside policy, these should make provision for some formal recreational use. The NPPF states that local policy for managing development within a Local Green Space should be consistent with the policy for Green Belts. Paragraph 81 states:

*Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for **outdoor sport and recreation**; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.*

5. VIABILITY ASSESSMENT

- 5.1 It is noted that limited detailed input was fed into the Viability Assessment by the landowner of NMF. However, it is clear from the November 2014 Whole Plan & Community Infrastructure Level Viability Assessment that NMF is viable and deliverable. The landowner of NMF is willing to take part in detailed discussions regarding the viability reports for NMF (options 1 and 2) and has made it clear that the development proposals for the site can initially and if necessary accommodate the total costs of the new junction access onto the A27. The Viability Assessment should be amended to take this into account.
- 5.2 As established above the development at New Monks Farm would generate revenue that could initially cover the total cost of the new junction to the A27. It is expected (but not relied upon) that cross funding will be forthcoming from agencies and initiatives, due to the

wider benefit delivered to the road networks. Also beneficiaries of this new access may be required to contribute towards the overall costs.

5.3 On balance we do not consider that the increase in costs will remove the entire viability margin but the costs in relation to both options are significant. We would welcome detailed discussions in due course regarding site specific costs as some of those included in the report will require scrutinising and we may challenge these. The major areas are as follows:

- Flood risk mitigation
- Third party land costs
- Legal agreements
- Finance calculations
- Abnormal building foundation costs
- Services infrastructure
- Country Park establishment, management and maintenance costs

Our Ref: 02/333



Ms Moira Hayes
Planning Policy
Adur District Council
Civic Centre
Ham Road
Shoreham by Sea
West Sussex BN43 6PR

7th November 2013

Dear Ms Hayes,

REVISED DRAFT ADUR LOCAL PLAN CONSULTATION 2013

I refer to the Revised Draft Adur Local Plan 2013 (RDLP 2013) and our representations are made on behalf of New Monks Farm Development Ltd.

We have provided our comments under the following headings:

- RD Policy 3 Housing Provision,
- Map 3 Site Allocations,
- RD Policy 5 New Monks Farm (NMF) including Map 4,
- RD Policy 7 Shoreham Airport including Map 7,
- RD Policy 13 Adur's Countryside and Coast,
- All references to Shoreham Airport proposed access to A27 within Revised Draft Local Plan,
- All references to Green Gaps within the Draft Local Plan,
- Sustainability Appraisal.

In addition and to supplement our representations, we have submitted the following technical reports and a map:

1. Updated Flood Risk Technical Note by Capita - 29th October 2013.
2. Updated Highways Report by RGP - 7th November 2013.
3. A correction to Map 4 (including illustrative masterplan) with correct access from the A27 to the NMF development site.

RD Policy 3 Housing Provision

We consider that Adur District Council should make every effort to achieve the objectively assessed housing need of the District in accordance with the National Planning Policy Framework (NPPF). We do not consider there are landscape constraints to increasing the level of housing provision.

Map 3 Site Allocations

We object to the reference: 'proposed Local Green Gap' (see below for more detail). In addition, we consider that the Proposed Built Up Area Boundary (coloured orange) should include the strategic allocation of NMF.

RD Policy 5 New Monks Farm and Map 4

We generally support the policy (see below regarding Map 4) and the range of proposed development uses including:

- 450 - 600 houses,
- A neighbourhood centre/community hub,
- A new school (see concerns/comments below),
- 10,000sqm of employment generating uses,
- Suitable access onto the A27 ,
- Provision or funding for off-site traffic impacts,
- Provision of sustainable transport infrastructure,
- Site specific travel behaviour initiatives/travel plan proposals.

However, we have the following concerns/comments to make on the Policy:

1. Improving the access across the A27 to the South Downs National Park for pedestrians and cyclists is only supported if this is a viable and deliverable development option.
2. The costs of the new roundabout to the A27 and pedestrian road crossing which total circa £4.25m, can be funded by the proposed development however we would expect additional and supporting funding to be forthcoming from various stakeholders and agencies.
3. Whilst we have no objection to providing a Landscape/Green Infrastructure Strategy - this is referenced in the policy with limited, if any, mention of it within the supporting text. Our concerns/comments and objections are as follows:

- The Preliminary Ecological Appraisal 2012 for the site states that it is not subject to any statutory or non-statutory nature conservation designations. It does however, state that construction works that may result in the loss of, or other impacts on the north-west section of the site, scrub/tree-lines along Mash Barn Lane and the network of ditches (and associated riparian habitats) is avoided. These habitats should be retained and protected, except where loss is unavoidable, and only after an appropriate programme of mitigation, compensation and enhancement has been put in place.
 - As there are no statutory or designated sites within the development area, we are concerned that this part of the policy is not clear about those elements that are to be protected and/or enhanced and why.
 - Para 2.57 within the RDLP 2013 states that the most important biodiversity habitats are the network of streams and ditches. We only support therefore reference to the streams and ditches being safeguarded and enhanced.
4. We assume the Council's standards for sports and recreation is that set out in the Infrastructure Guidance 2013. We consider it is appropriate that some of the formal sports/recreational requirement could potentially be located within the Country Park in order to introduce flexibility to the overall development.
 5. We object to the reference to development respecting the landscape of the Lancing-Shoreham by Sea Local Green Gap (see below). The essence of a Green Gap (of which we object to anyway) is to prevent towns coalescing. It is not a landscape based policy.
 6. Whilst we support a school being located at NMF, this is subject to the Council proving the need for it, how it will be funded and importantly, how and when it will be delivered.
 7. We object to the current wording of 'a Country Park and informal recreation' and request that this is amended to 'a Country Park, informal and potentially formal recreation'. The Council should note that an allocation of formal recreation use within the Country Park would help to generate funds towards the on-going maintenance and management of the Park.



With regard to Map 4 that accompanies RD Policy 5, this shows an incorrect access from the A27 into the site. The correct masterplan is attached. In addition, we have the following comments/objections:

- We object the proposed siting of the school being annotated on the Map. This is not based on any technical work and may in reality not be an appropriate place for a school (in proximity to a professional football training ground for example)
- We object to the area of ecological enhancement being identified on the plan.
- It is considered that the whole site including the Country Park be shown as the strategic allocation in one colour and the development area shown in a separate annotation.
- The reference to Country Park in the key should also include the words 'potentially formal recreation uses'.

RD Policy 7 Shoreham Airport

We object to any references within this policy to new access arrangements onto the A27 from the airport in order to serve the proposed development of the site as insufficient supporting evidence has been provided to the Highways Agency and the scheme has not been progressed to demonstrate that it is a deliverable or effective safe solution. This is in contrast to the westerly proposal positioned on land at New Monks Farm, which is well advanced with the Highways Agency and deliverable from both a land ownership and technical perspective

We object to the roundabout option 1 Shoreham airport as shown as part of Map 7.

RD Policy 13 Adur's Countryside and Coast

We object to the reference within this policy to Local Green Gaps. These policies are no longer supported within the National Planning Policy Framework and there is confusion as to the function of Local Green Gaps within the draft Local Plan. They appear to be designated as countryside/landscape areas when they are in reality a form of policy to prevent towns coalescing (akin to metropolitan green belt policies). However, they are outdated and are not relevant. It is confusing to add them into a wider policy on the countryside and we therefore object. This policy should be well thought through and in accordance with government policy. As it stands it seeks to cover too many different issues and the draft Local Plan even permits significant new development within the Local Green Gap - such as that at the Airport. We also object to all other references to Local Green Gaps in the Plan (see below).

References to Shoreham Airport proposed access to A27 within Revised Draft Local Plan

We object to all references to the proposed new access onto the A27 to serve the Shoreham Airport development. We do not consider this is a deliverable option. We therefore object/comment on the following:

1. Para 2.53 is supported only if the reference is made to the new access onto the A27 from NMF and not the airport
2. We object to any reference in para 2.57 to an improved/new access to the airport and support the new roundabout at NMF.
3. We object to any reference in para 2.87 to an improved/new access to the airport and support the new roundabout at NMF.
4. We are concerned with the contents of para 2.88. It seeks to highlight the need for the roundabout onto the A27 being located at NMF due to the delays in bringing forward the airport development option.

All references to Green Gaps within the Draft Local Plan

We object to all references to the Local Green Gap within the draft Local Plan as follows:

1. Objectives 6 & 7 on page 16
2. RD Policy 2 Spatial Strategy and the reference to compromising the Local Green Gap.
3. Para 2.22 and the reference to having a severe impact on Local Green Gaps.
4. Object to para 3.43 and references to Local Green Gaps.
5. Object to para 3.46 and in particular to 'a key challenge for this Local Plan is to balance the need for development against the need to minimise the impact on the countryside and landscape character, particularly in these gaps'. This is confusing as to the function and need for a Green Gap.
6. Object to para 3.48
7. Object to 3.49 and 3.50 which appears to support development within the Green Gap at the airport.
8. Object to 4.58.
9. Object to para 4.93.



Sustainability Appraisal (SA)

We are concerned about some of the references within the SA to NMF and RD Policy 5. We object to the references to the Local Green Gap. The summary from the SA within the Draft Local Plan at para 2.66 is misleading as there are no historic environment issues regarding this site. In addition, we object to any references to a joint access onto the A27 with the airport. We also object to any concerns from a landscape point of view to developing the site.

In conclusion, we are in general support of the Local Plan and Policy 5 New Monks Farm. We consider that NMF is a deliverable strategic allocation.

We would welcome a meeting with you to discuss our comments and proposed changes to the Local Plan in more detail.

Yours sincerely

A solid black rectangular box used to redact the signature of Martin A Carpenter.

Martin A Carpenter MRTPI
DIRECTOR

c.c. P. Roelich and L. Murphy, New Monks Farm Development Ltd

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Paragraph 2.53
Paragraph 2.57
Paragraph 2.87
Paragraph 2.88.

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- Paragraph 3.43
- Paragraph 3.46.
- Paragraph 3.48
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Name	<input type="text"/>		
Company / organisation name (if relevant)	<input type="text" value="New Monks Farm Development Ltd"/>		
Your Full Address	<input type="text" value="C/O Enplan"/>		
	<input type="text"/>	Post Code	<input type="text"/>
Telephone	<input type="text"/>		
Email	<input type="text"/>		

Agent's name	<input type="text" value="Martin Carpenter"/>		
Company / organisation name (if relevant)	<input type="text" value="Enplan UK Ltd"/>		
Full Address	<input type="text" value="10 Upper Grosvenor Road, Tunbridge Wells, Kent"/>		
	<input type="text"/>	Post Code	<input type="text" value="TN1 2EP"/>
Telephone	<input type="text" value="REDACTED"/>		
Email	<input type="text" value="REDACTED"/>		

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Flood Risk Technical Note

29th October 2013

To Philip Russell-Vick, Enplan

Subject Discussion of Draft Adur Local Plan requirements

1) Background to the Draft Adur Local Plan

The Draft Adur Local Plan will provide a clear strategy for development in Adur up to 2031 and will form the context for the planning and development in Adur district. The first round of consultation on the plan was carried out between September and October 2012. A further period of consultation is currently being undertaken following the publication of the Draft Adur Local Plan in September 2013.

2) Aim of Flood Risk Technical Note

New Monks Farm is included in the Draft Local Plan as a Strategic Allocated Site under Revised Draft Local Plan Policy 5. This identifies a mix of uses, including employment, an informal country park, community hub and up to 600 dwellings. The Draft Plan discusses in detail a range of measures that need to be implemented to support the proposed development. The aim of this Flood Risk Technical Note is to summarise the flood risk requirements outlined in the Plan and demonstrate how they will be met as part of the development proposals at New Monks Farm. This Flood Risk Technical Note should be read in conjunction with the New Monks Farm Flood Mitigation and Drainage Strategy Report prepared by Capita Symonds, dated 6 June 2012.

3) Flood Risk Elements of Revised Draft Policy 5: New Monks Farm, Lancing

The key flood risk policies have been extracted from the Draft Local Plan below. An explanation of how the current development proposals will satisfy each of the requirements is provided beneath each of the flood risk policies.

Revised Draft Policy 5: New Monks Farm, Lancing

"Developers will need to work with Adur District Council, West Sussex County Council and the Environment Agency to ensure that tidal and fluvial flooding as well as surface water and groundwater flooding are adequately mitigated without worsening flood risk elsewhere. Opportunities to reduce flood risk elsewhere should also be sought. These issues should be addressed in detail by a Flood Risk Assessment at the planning application stage."

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Capita Property and Infrastructure Ltd

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Consultations with key stakeholders including Adur District Council, and the Environment Agency have been undertaken throughout the development of the site proposals. The landowner has held regular meetings with the aforementioned stakeholders during the last 8 years whilst they have been involved with the promotion of the site. The most recent meeting was held with Environment Agency in June 2012 to discuss the proposed layout of the masterplan for the strategic allocation of New Monks Farm and the management of flood risk. During this meeting it was apparent that the Environment Agency was supportive of the scheme and the proposed methods for managing flood risk. Reference is made to the June 2012 Meeting Minutes which are attached at **Appendix A**. Following this meeting the Environment Agency reviewed the 2012 Capita Symonds Flood Mitigation and Drainage Report and their comments will be incorporated into any future NPPF compliant Flood Risk Assessment that will be submitted for the site.

Discussions have also been held with Ken Argent the Drainage Engineer at Adur District Council and Worthing Borough Council. He is supportive of the maintenance regime that has been in place to date and supports the continued maintenance of the drainage ditches in the future.

Whilst design and master plan options have evolved for the development land, a number of flood risk constraints have been considered and factored into the draft master plan proposals and the developable area in order to limit the flood risk to the site. Accordingly, the development proposal includes the following features which reduce flood risk to the site:

- The residential properties and the care home are predominantly located outside of the defended 1 in 200 return period event (Flood Zone 2) flood outline;
- The golf course is located in the area at highest risk of flooding during the 1 in 200 year tidal flood event;
- Ground levels will be raised in the residential and commercial areas to ensure they are above the 1 in 200 year return period event (including climate change) flood level.
- Existing watercourse that cross the site shall be retained and the sides bermed in areas of landfill to provide additional flood storage and the ability to convey flood flows across the site from the developed areas to the west. These watercourses will connect to the flood alleviation measures designed and built within the golf course construction which provided flood storage;
- The watercourses through the site have regularly been maintained by the landowner for the past 5 years. In undertaking these clearance works the land owner has been in regular contact with the Environment Agency and Arun District Council as set out in the correspondence at **Appendix B**;
- The proposed re-development of the site will have an ongoing requirement to regularly maintain three ditches to allow for the flow of water through the site in order to reduce any potential impact on the surrounding areas;
- Attenuation of run-off; and
- Profiling of the land to ensure that run-off drains to the east (i.e. away from the existing residential properties).

Other Flood Risk points include:-

- *Retention and enhancement of existing network of water bodies on site for drainage and ecological benefits;*

As confirmed above, the riparian owner of the site has been proactive and ensured that all drainage ditches have been maintained over the past 5 years thereby reducing the risk of properties upstream of the development. This maintenance ensures that the capacity to convey flows within the ditches is not impeded by debris and damage/erosion to the banks of the channels. The continued maintenance of these ditches is an important factor in helping to reduce flood risk upstream of the site and will continue post development

with any required maintenance arrangements agreed until the SuDS Approval Body can be established and the maintenance of these features is managed by the Lead Local Flood Authority. All existing water bodies will be retained on site and appropriate consideration will be given to the existing ecology and how this can be enhanced.

- *The development is to be connected to sewerage and water distribution networks at the nearest points of adequate capacity, as agreed with Southern Water*

During the preparation of the drainage strategy consultation will be undertaken with Southern Water to discuss and confirm possible network connections for the future planning application. If required, a capacity check on the drainage and foul network will be completed in order to determine if there is sufficient network capacity to accommodate the development proposals. It should be noted that surface water runoff will be managed within the boundary of the site and discharged at a rate that reflects Greenfield runoff conditions.

4) **Revised Draft Policy 36: Flood Risk and Sustainable Drainage**

A site specific flood risk assessment must be submitted with planning applications for:

- *Proposals of 1 hectare or greater in Flood Zone 1*
- *All development in Flood Zones 2 and 3*
- *All development or change of use, regardless of flood zone or size, where flood risk from other sources (surface water, sewer, groundwater) is identified by the Strategic Flood Risk Assessment*

In support of any formal outline planning application a NPPF compliant Flood Risk Assessment (FRA) will be submitted as supporting evidence for the development proposals. This FRA will include:

- An assessment of the risk of flooding from all sources of flooding,
- A thorough review of historic flooding;
- It will address the current flood risk; and
- It will comment on how future flood risk will be managed.

The FRA will be supported by a surface water drainage strategy which shall demonstrate how surface water runoff will be controlled within the boundary of the development application and demonstrate how the site will not increase flood risk elsewhere.

The flood risk assessment will need to demonstrate that development:

- *Is appropriately flood resilient, includes safe access and escape routes where required, and that any residual risk can be safely managed;*

The site is protected up to the 1 in 200 year return period (0.5% AEP event) by the tidal defences along the River Adur and coastal frontage. With this primary flood risk management measure in place there is a low probability of flooding under normal conditions. However, there remains a residual risk should there be a breach in the defences along the River Adur or there was overtopping of the defences on the coastal frontage during the 1 in 200 year return period (0.5% AEP event). As the effects of climate change are realised, the majority of the site would suffer from inundation in the future (2115) 1 in 200 year event.

As agreed with the Environment Agency the proposed development areas will be raised above existing ground levels by extensive filling operations to ensure that all residential and commercial developments are raised above the undefended 1 in 200 year coastal flood event including an allowance for climate change up

to 2115. An additional 300m freeboard allowance will be provided to account for wave actions and uncertainty in coastal modelling results.

Although the raised site will be at a low risk of flooding, floor levels of all habitable dwellings will be elevated by an additional 150mm (as a minimum) above the surrounding final ground levels. Wave overtopping and flood defence failure is a consideration for the site, however incorporating suitable flood risk mitigation based on predicted undefended tidal flooding levels will minimise this risk and is therefore not considered any further within this assessment. Ditches will be maintained and bermed so overland flows are maintained. This approach was agreed with Adur District Council and the Environment Agency for the previous golf course application.

As part of the future planning application for the a site specific flood evacuation plan will be developed in consultation with the Emergency Planners at both Adur District Council and West Sussex County Council. The Emergency Plan will take account of flood warnings times from the Environment Agency and will highlight the safe access and egress routes through and out of the site.

- *Will be safe for its lifetime taking account of the vulnerability of its users;*

The residential properties and the potential care home are predominantly located outside of the defended 1 in 200 return period event flood outline. As a result of the proposed flood risk management measures the development will be safe for the lifetime of the development (currently assumed to be 50 years for commercial uses and 100 years for the residential uses).

- *Will not increase flood risk elsewhere;*

As requested by the Environment Agency any future Flood Risk Assessment will consider the impact of flood risk elsewhere. The existing flood risk will be investigated with the existing stakeholders and appropriate flood risk measures mitigation will be discussed. It will be demonstrated that the development does not increase flood risk and will present options to help alleviate the existing flood risk.

- *Will, where possible, reduce flood risk overall; and*

See discussion under Draft Policy 5.

- *Will give priority to the use of sustainable drainage systems (SuDS).*

A summary of Adur District Council's SuDS requirements is provided below. Priority has been given to the use of SuDS on site and reference should be made to the 2012 Flood Mitigation and Drainage Report. The proposed SuDS are summarised below:-

- Surface water from the development will be collected and stored on site and where practical provisions will be made to improve water quality prior to discharge;
- At this stage it is assumed that all surface water will be conveyed from the site areas into four (4) attenuation basins;
- Discharge from the basin will be restricted using a flow restricting device (e.g. hydrobrake or similar) and conveyed into the existing ditch system via a separate outfalls; and
- Additional SuDs features will be considered such as swales, permeable paving, green roofs and other source pathway techniques at the detailed design.

Summary of SuDS requirements

New Development within Adur must include some form of SuDS or other appropriate design measures in order to reduce the risks of surface water flooding and to mitigate the risk of pollution to groundwater sources. SuDS should be considered before other forms of disposal.

Substantial storage through SuDS will be required to achieve a reduction in runoff to levels below that experienced prior to development. On relevant sites, storage of runoff during the high part of the tidal cycle should be addressed. SuDS must be designed sensitively and must seek to enhance landscapes, increase biodiversity gains, and provide quality spaces.

For all developments, applicants will be required to demonstrate that acceptable management arrangements are in place and funded to ensure the ongoing maintenance of SuDS into the future. Where it is not practical to provide SuDS on site, the development of strategic level SuDS may be considered appropriate. In these circumstances, contributions may be required through s106 undertakings/ CIL.

Please refer to the above comments relating to SuDS. Any other information relating to the selection of SuDS within the site can be obtained within the June 2012 New Monks Farm Flood Mitigation and Drainage Strategy Report.

We trust this Technical Note updates and addresses the Council's policy requirements concerning flood risk and other drainage issues in respect of the NMF Strategic Allocation as proposed under the above policies of the Draft Adur Local Plan.

Jeremy Muscroft
Director Capita Property and infrastructure
1 Procter Street, London, WC1V 6DW

Tel [REDACTED]

Email [REDACTED]

APPENDIX A

4-10-11 11:45
11-11-11 11:45

CAPITA SYMONDS

Minutes

New Monks Farm

14 June 2012

Environment Agency Guildbourne House, Worthing
June 12th 2012 at 10.30

Present

Keely Mowatt (KM)	Environment Agency
Lee Murphy (LM)	New Monks Farm
Jeremy Muscroft (JM)	Capita Symonds (CSL)
Louise Tattersall (LT)	Capita Symonds (CSL)

1. LM outlined the current position with regard the promotion of the masterplan for the New Monks Farm site. Adur District Council is very keen to see New Monks Farm developed, and are supportive of the site becoming a strategic allocation providing both employment and residential land within the emerging Local Plan. KM stated that in principle the Environment Agency remain supportive of the scheme.
2. LM confirmed that NMF have consulted with both South Downs National Park Authority and the Highways Agency during the promotion process. Detailed consultations are ongoing in relation to development access proposals from A27.
3. KM enquired about the existing drainage strategy at the adjacent golf course and if this would be compromised. JM confirmed that the proposed drainage strategy for New Monks Farm would complement the golf course. As part of the new development there would be additional detention ponds to support the development. There would be no compromise on the existing system. LM stated that technically speaking the golf facilities are an integral part of the overall masterplan.

CSL Action

It was agreed that a new plan would be drawn up to show the existing golf course drainage and how it is supplemented the newly proposed drainage scheme.
4. KM explained that funding has been agreed in principal for the upgrade to the fluvial defences on the River Adur. The EA are confident that the scheme will be implemented, however due to the way funding is allocated they are uncertain about when construction will begin. However, this will not impact the development of the site due to the proposed land raising; therefore any future development will not be dependent on the upgrade works. There were some technical difficulties, however these have been resolved are not holding up the works.
5. KM suggested contacting Ken Argent Land Drainage Engineer at Worthing

CSL Action

Borough Council regarding flooding incidents, especially associated with drainage issues and surface water in the area.

6. LT asked about the requirement to undertake breach analysis to inform the development proposals. KM confirmed that this would only be required if it was found that adequate land raising could not be carried out. KM confirmed that the EA would be happy with land raising to manage the residual risk of breach. Any future FRA would need to consider emergency access and egress however, this is not anticipated to be a problem. At this stage there is no requirement to discuss the scheme with the emergency planners at Worthing Borough Council.
7. LT asked if there were currently any plans to upgrade the coastal defences in the future, as their current Standard of Protection (SoP) is provided for the 1 in 100 year return period event. Km confirmed that the Shoreham to Lancing sea defences have a design SoP of 1 in 100 plus climate change and freeboard. Therefore the crest height of the defences means that it actually offers a greater than 1 in 100 year SoP. .
8. LM confirmed that NMF were already consulting with Brighton & Hove \ Albion FC regarding the plans for the football academy to ensure that both drainage schemes complement each other.
9. KM suggested that the proposed attenuation ponds should be integrated to increase the local biodiversity. The development of the drainage strategy will ensure that the development has a positive impact on the local flora and fauna and water quality, whilst reducing flood risk.
10. Any future site specific FRA would also need to consider and mitigate the existing flood risk at the properties in the north of the site particularly in the area of Manor Way/Hayley Road. It will also be important to provide comfort to the local residents that flood risk will not increase as a result of the New Monks Farm development.
11. In summary any future FRA produced to support a planning application would need to consider and address the following issues:-
 - The management of the existing ditches on site;
 - Management of groundwater on site;
 - Management of existing flood risk at properties in the north of the site;
 - Design of the attenuation basins—specific biodiversity aims;
 - Additional guidance on the golf course drainage and how both schemes will complement each other; and
 - Provide an updated position on the flood defences upgrade works.
12. Based on the current masterplan and the proposed management of flood risk the Environment Agency are supportive of the scheme. This is subject to detailed design and provision of a NPPF compliant Flood Risk Assessment.
13. It was agreed that the Capita Symonds June 2012 Flood Mitigation and Drainage Strategy Report would be amended to make note of the issues discussed in point 11 above. However, the issues would be addressed in detail when the site specific FRA is prepared. These minutes would be agreed with the Environment Agency and included within the revised report provided to

support the Core Strategy consultation process. Any future report would be supplemented with the additional information required from the EA at a suitable later date.

Jeremy Muscroft
Director
Capita Symonds

APPENDIX B

Tattersall, Louise (Capita)

From: Ken Argent [REDACTED]
Sent: 17 January 2013 11:06
To: Kevin.Macknay [REDACTED]
Cc: 'katbill'; 'Paul Roelich'
Subject: Lancing Drainage Ditches

Kevin,

I received a phone call today from Paul Roelich from the "Golf Course" development in north Lancing, he confirms that he completed maintenance clearance of all the ditches on the development yesterday.

He also cleared the pond that lies just west of his land on the airport.

Muddy water from these works was noted by ADC operatives who were yesterday lowering the ditch bed level beneath New Salts Farm Road Bridge and the adjacent brick arch, some 550m further down stream which confirms that the system is actively flowing towards the Adur Tidal Outfall.

The ADC operatives have lowered the bed level at the bridge by around 500mm, this work combined with that of Paul Roelich continues to improve the drainage situation.

Ken Argent - Engineer BSc, RMaPS | Technical Services, Adur District Council and Worthing Borough Council

Location: Adur Civic Centre, Civic Centre, Ham Road, Shoreham-by-Sea, West Sussex, BN43 6PR

Internal: [REDACTED] | External: [REDACTED] | [REDACTED]

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[Faint, illegible text]

[Faint, illegible text]

[Faint, illegible text]

Tattersall, Louise (Capita)

From: Paul Roelich [REDACTED]
Sent: 12 August 2013 10:29
To: 'Ken Argent'
Cc: Matt Hollywood
Subject: RE: Ditch Clearance North Lancing

Hi Ken,

I'll can confirm that we did clear the ditches on Mr Monnery's land approx. 2 years ago, Here are my agents details who deals with Mr Monnery for me so you can contact him directly and he will seek access for you. As follows:-
Matthew Hollywood BSc Hon email :- [REDACTED]

Kind Regards

Paul Roelich

New Monks Farm Development Limited

From: Ken Argent [REDACTED]
Sent: 09 August 2013 14:25
To: 'Paul Roelich'
Subject: Ditch Clearance North Lancing

Paul,

Hope the holiday was good sorry to have interrupted it.

Our ditch clearance is coming on but I have hit a stumbling block.

Looking at the attached map I intend to clear reach H using the suction machine.

I contacted Mr. Lower who gave me permission to clear the section s in his field marked **okay** on the plan. This leaves the length marked **?**

I know in the past you cleared an area to the west of Mash barn lane, (for Mr. Monnary?), can you confirm how far west you went.

I can't contact Mr Monnary we've tried letters and obviously knocking to no avail, so I cant get into his fields to see what's going on

If I can get to the start of the trees shown green roughly how much further do I need to go to join up with what you did?

Ken Argent - Engineer BSc, RMaPS | Technical Services, Adur District Council and Worthing Borough Council

Location: Adur Civic Centre, Civic Centre, Ham Road, Shoreham-by-Sea, West Sussex, BN43 6PR

[REDACTED] | [REDACTED] | [REDACTED]

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Tattersall, Louise (Capita)

From: Ken Argent [REDACTED]
Sent: 23 January 2013 09:46
To: 'Paul Roelich'
Subject: FW: Fw: Lancing Drainage Ditches
Attachments: 20130109 Lancing Brooks photographs.pdf

Paul,

Attached is a report by the EA into the efficiency of their outfall at the Dog Trust. At the rear of the report are 4 "throw away" photos of in ditch vegetation.

Quite why they are included I'm not sure but if you read the chain email at least 3 of the photos are attributed to the golf course.

Could you take a look and see what you think and can find on site.

Also you said you are constrained by the EA as to when, how, and how frequently you clear the ditches, do you have this constraint in writing anywhere if so could you forward a copy of it to me.

I think I can see a potential for finger pointing episode arising from this document, so fore warned is fore armed as they say.

Ken Argent - Engineer BSc, RMaPS | Technical Services, Adur District Council and Worthing Borough Council

Location: Adur Civic Centre, Civic Centre, Ham Road, Shoreham-by-Sea, West Sussex, BN43 6PR
[REDACTED]

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From: Jackson, Adrian [REDACTED]
Sent: 22 January 2013 10:30
To: Wilson, Gordon
Cc: Ken Argent
Subject: RE: Fw: Lancing Drainage Ditches

Agree with Ken. D looks like New Monks Farm Lane

C – could be anywhere

A/B – photo A looks like the Airport buildings in the background. Based on the way the land is landscaped I'd hazard a guess its somewhere within the new golf course

From: Wilson, Gordon
Sent: 22 January 2013 10:17
To: Ken Argent; Jackson, Adrian
Subject: RE: Fw: Lancing Drainage Ditches

Ken,
They were taken by Andy Walker from our AP team, who is unfortunately on holiday until 4 Feb.
Adrian,
Are you able to help with Ken's query?
Thanks,
Gordon

Gordon Wilson CEng, C.WEM, MSc, BSc, DMS
Senior Team Leader
Partnership and Strategic Overview, West Sussex
Flood and Coastal Risk Management
Solent & South Downs Area
The Environment Agency
[REDACTED]

From: Ken Argent [REDACTED]
Sent: 22 January 2013 08:21
To: Wilson, Gordon
Subject: FW: Fw: Lancing Drainage Ditches

Gordon

Can your team please tell me where photos 7 (a-d) are taken.

7d is east of mash barn lane (golf course) I think.

Ken Argent - Engineer BSc, RMaPS | Technical Services, Adur District Council and Worthing Borough Council
Location: Adur Civic Centre, Civic Centre, Ham Road, Shoreham-by-Sea, West Sussex, BN43 6PR
[REDACTED]

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From: Wilson, Gordon [REDACTED]
Sent: 21 January 2013 16:54
To: smsmith [REDACTED]; Kevin.Macknay [REDACTED]; Ken Argent; Bryan Curtis;
martin.jones [REDACTED]; mark.thompson [REDACTED]
Cc: Jackson, Adrian; Richardson, Justine; Robinson, David
Subject: RE: Fw: Lancing Drainage Ditches

Stuart,

Our local Asset Performance (AP) team Technical Advisor inspected the Lancing Brooks outfall on 9 Jan.'13. I attach a file with photos taken. The Consultant's design report for the new structure, identifies a 300mm head after the flap valves close, as the correct level for optimising performance. I attach their technical note.

The AP team will instruct our in-house contractor to inspect the chambers (again) for blockages or any irregularities. These are penstocks within the chamber which can be operated manually for maintenance purposes. At all other times, they are kept open.

With regard to over pumping, our view remains that this would be ineffectual, due to the sheer quantity of water involved (predominantly groundwater in combination with tidal influences and water from the South Downs). However, we have no objection if WSCC wish to install and operate a pump, as a temporary measure.

Thanks,
Gordon

Gordon Wilson CEng, C.WEM, MSc, BSc, DMS
Senior Team Leader
Partnership and Strategic Overview, West Sussex
Flood and Coastal Risk Management
Solent & South Downs Area
The Environment Agency
[REDACTED]

From: smsmith [REDACTED]
Sent: 18 January 2013 11:27
To: Kevin.Macknay [REDACTED]; Ken.Argent [REDACTED]; bryan.curtis [REDACTED]
Wilson, Gordon; martin.jones [REDACTED]; mark.thompson [REDACTED]
Subject: Re: Fw: Lancing Drainage Ditches

Click [here](#) to report this email as spam.

Intresting.

I had the outfall discharge levels checked on tuesday, 2hrs before hightide and 1 hr after, there was an approx. 300mm increase in water level at the outfall.

As a consequence Im talking with F&R to get hold of their high velocity pump to see if that makes any impact.

MARTIN.... could you check levels in your manholes please high tide today is 1546 and monday will be 1842. In view of distance from outfall I would suggest if you still have guys on site every hour from 2 before until 2 after.

GORDON.... my man said there were two screws on top of the headwall which suggested gates, is that the case, only ask because he was surprised and how little flow there seemed to be at low tide ?? although that said with the measured backup suggests there obviously is a flow

Stuart

<p><u>Stuart M Smith</u> Service Manager for Highways , West Sussex Highways, <u>West Sussex County Council</u> Location: County Hall North, Horsham, West Sussex RH12 1XA</p> <p>[REDACTED]</p>
--

Kevin Macknay/SU/WSCC

To Stuart M Smith/[REDACTED]
cc

18/01/2013 09:33

Subject Fw: Lancing Drainage Ditches

Stuart - FYI

<p><u>Kevin Macknay</u> Drainage Strategy Team Leader, <u>West Sussex County Council</u> Location: West Sussex Highways, Drayton Depot, Drayton Lane, Drayton, Chichester, West Sussex. PO20 2AJ</p> <p>[REDACTED]</p>
--

Think sustainably. Do you have to print? Can you double side? Do you need colour?

----- Forwarded by Kevin Macknay, [REDACTED] on 18/01/2013 09:33 -----

Ken Argent [REDACTED]

17/01/2013 11:05

To "Kevin.Macknay [REDACTED]" <Kevin.Macknay [REDACTED]>
cc 'katbill' [REDACTED], 'Paul Roelich' [REDACTED]
Subject Lancing Drainage Ditches

Kevin,

I received a phone call today from Paul Roelich from the "Golf Course" development in north Lancing, he confirms that he completed maintenance clearance of all the ditches on the development yesterday.

He also cleared the pond that lies just west of his land on the airport.

Muddy water from these works was noted by ADC operatives who were yesterday lowering the ditch bed level beneath New Salts Farm Road Bridge and the adjacent brick arch, some 550m further down stream which confirms that the system is actively flowing towards the Adur Tidal Outfall.

The ADC operatives have lowered the bed level at the bridge by around 500mm, this work combined with that of Paul Roelich continues to improve the drainage situation.

Ken Argent - Engineer BSc, RMaPS | Technical Services, Adur District Council and Worthing Borough Council

Location: Adur Civic Centre, Civic Centre, Ham Road, Shoreham-by-Sea, West Sussex, BN43 6PR
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Tattersall, Louise (Capita)

From: Ken Argent [REDACTED]
Sent: 31 July 2012 07:55
To: 'Paul Roelich'
Subject: Mash barn lane

Paul

I checked Mash Barn culvert yesterday it appears to be flowing thanks for everything you did there and across your site.

Ken Argent - Engineer BSc, RMaPS | Technical Services, Adur District Council and Worthing Borough Council
Location: Portland House, Richmond Road, Worthing, BN11 1HS
[REDACTED]

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Tattersall, Louise (Capita)

From: Paul Roelich [REDACTED]
Sent: 06 March 2013 16:45
To: 'Ken Argent'
Subject: RE: Access to your land

Hi Ken,

I have call Dave as requested, they are arranging a new time and date as the tides are not at the optimum for pumping at the moment. They will call me when they need assistance to monitor the water level on our site.

Regards

Paul Roelich

New Monks Farm Development Limited

From: Ken Argent [REDACTED]
Sent: 06 March 2013 15:29
To: 'Paul Roelich'
Subject: Access to your land

Paul,

I am working with WSCC to improve the flooded area around Manor Way ,Manor Close, WSCC are keen to try a pumping exercise at the dog kennels tomorrow and would like to monitor water levels at the golf course / airport intersection where the weir was too see if pumping actually drops the levels.

WSCC asked if I could show them where their chosen monitoring point is but I have referred them to you. Dave Billingham [REDACTED] will try to contact you unless you can contact him, could you assist him please.

They are not suggesting your site is the problem; they have monitoring points along the stream and are looking to see how far upstream pumping may influence.

Cheers

Ken Argent - Engineer BSc, RMaPS | Technical Services, [Adur District Council](#) and [Worthing Borough Council](#)
Location: Adur Civic Centre, Civic Centre, Ham Road, Shoreham-by-Sea, West Sussex, BN43 6PR
[REDACTED]

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Tattersall, Louise (Capita)

Subject: FW: Ditch Clearance

From: Paul Roelich [REDACTED]
Sent: 31 October 2013 11:53
To: Muscroft, Jeremy (Capita)
Subject: FW: Ditch Clearance

Hi Jerry,

Please find set out below the current email correspondence between New Monks Farm Development Ltd and Adur District Council regarding ditch clearance works.

Regards

Paul Roelich

Director

New Monks Farm Development Limited

From: Ken Argent [REDACTED]
Sent: 31 October 2013 11:38
To: 'Paul Roelich'
Cc: [REDACTED]
Subject: RE: Ditch Clearance

Tim

Based upon the email below from Paul could I ask you to leave the gate open on Tuesday so that we can get to the bottom of your garden and see the trees from both sides please.

Paul

I will contact you Monday with a time to meet Tuesday if that's okay

Ken Argent - Engineer BSc, RMaPS | Technical Services, Adur District Council and Worthing Borough Council
Location: Adur Civic Centre, Civic Centre, Ham Road, Shoreham-by-Sea, West Sussex, BN43 6PR
[REDACTED]

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From: Paul Roelich [REDACTED]
Sent: 31 October 2013 10:56
To: Ken Argent
Subject: RE: Ditch Clearance

Ken,

We are more than happy to undertake the ditch clearance works as required, I think it best that we meet on site Tuesday morning as early as you can make it so we are clear on the exact location of Mr James garden and the

extent of the clearance works required. We can start the work straight after our site meeting. Please let me know what time you are available to meet.

Regards

Paul Roelich

Director

New Monks Farm Development Limited

From: Ken Argent [REDACTED]
Sent: 31 October 2013 09:36
To: 'Paul Roelich'
Cc: [REDACTED]; 'Kevin Macknay'; 'Bill Freeman'
Subject: Ditch Clearance

Paul

Thank you for your offer to clear the ditch in Mr Monnery's land, and in addition the 10m of ditch that we were unable to clear ourselves from the south bank because of the existence of a Badger Sett.

I have spoken to Mr Tim James the owner of No 70 Old Shoreham Road, regarding access through the trees that form the boundary between his property and that of Mr Monnery. Mr James has agreed to allow trees to be removed, with the following provisos:-

The trees are as small as possible, and, they are as close as possible to the northern bank of the ditch i.e. right at the extreme bottom of the garden, and finally he is given as much warning of the works being undertaken as possible.

Therefore I would like to take up your offer to undertake the work, could I ask that silt removed from Mr James's length is deposited within the confines of Mr Monnery's land; Mr Monnery has indicated he is in agreement with this request.

As discussed I would like to meet you on site to agree the exact works required, (I am not available until Tuesday next week).

I have copied in Mr James, Mr Macknay of WSCC who are the Lead Local Flood Authority and Mr Freeman the secretary of the Lancing Manor, (SE) Resident Network, who will let the local residents know that ditching works have been completed by you to our satisfaction, for this year.

Thank you for your assistance.

Ken Argent - Engineer BSc, RMaPS | Technical Services, Adur District Council and Worthing Borough Council
Location: Adur Civic Centre, Civic Centre, Ham Road, Shoreham-by-Sea, West Sussex, BN43 6PR
[REDACTED]

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Mr Philip Russell-Vick
Enplan
10 Upper Grosvenor Road
Tunbridge Wells
Kent
TN1 2EP

07 November 2013
Our Ref: NMFD/11/1349s

Dear Philip,

RE: NEW MONKS FARM, LANCING

RGP have been working with the owners of the land at New Monks Farm for many years and during this time numerous meetings have been held with the Highways Agency, (including their consultant representatives), West Sussex County Council and others, as the master plan proposals have evolved. Much data has been collected and robust modelling undertaken to establish all proposals put forward to support the strategic adoption and on-going development of the land and to show that they are technically deliverable, (as well as being appropriate to, and considerate of, the wider network). RGP has agreed with The Highways Agency and West Sussex County Council an in-principle approach to providing access for the development of land at New Monks Farm – the main principles being that access for non-local, car-based traffic would be at the A27, but specifically, it was agreed that the access should be positioned at a location to be decided subject to representations to the Highways Agency, by RGP on behalf of New Monks Farm Development and consultants for Shoreham Airport.

Having analysed and capacity-tested all practical options it was found that the only solution that could meet capacity and safety requirements, as well as maintained the on-going requirements of the wider road network, was an access solution that involved a signalised roundabout to the west of the combined airport and New Monks Farm site frontages – as a result this became RGP's preferred option. Shoreham Airport favoured a main access eastward, generally in place of The Sussex Pad but to date, no formal submission has been made to the Highways Agency for technical appraisal, in contrast to RGP's proposal to the west, which has received in-principle technical support from the Highways Agency.

A design premise for a new access at the A27 has from the very beginning of talks been the aspiration of all stakeholders to improve traffic conditions at The Sussex Pad, and also on the section of A27 generally west, up to and including its junction with Busticle Lane.

By a combination of land uses that are complementary, (by encouraging reduced movements, especially by car and locally), well planned non-car infrastructure, and the introduction of Travel Planning initiatives, (including a Community Hub), and additional good access at the A27 for longer distance car travel, it is considered that the development of New Monks Farm and the airport would have a comparatively low reliance on car-based travel.

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As of now, by working with stakeholders to develop a joint plan for the regeneration of the airport and the development of New Monks Farm, RGP has prepared an access design that; effectively addresses the identified constraints, accommodates the capacity needs of the development aspirations for both sites, and addresses shortcomings in the condition of safety on the A27 - principally by way of works to the existing Sussex Pad junction.

Against the background of much technical assessment and design iterations, the Highways Agency has agreed to the principle of RGP's design as a safe and convenient means to deliver the development aspirations and improvement to conditions on the A27. In parallel with the work undertaken on behalf of New Monks Farm Development, Parsons Brinkerhoff, on behalf of the Highways Agency, has carried out an extensive modelling of the highway network, (principally the A27) - the results of that work has recently been published. Those studies were undertaken independently of RGP's work. Importantly, the input to Parsons Brinkerhoff's work includes allowances for development of New Monks Farm and the airport, and many of its conclusions are shared by those derived from RGP's work. Most notably, against the background of the respective independent work, Parsons Brinkerhoff, has agreed to RGP's access design involving the construction of a signalised roundabout in a westerly position and the conversion of The Sussex Pad to a left in/left out junction. Given this agreement, the Highways Agency has provided RGP with details of its plans for the area, including a cycle-path scheme and the new requirements for a VOSA facility – so these can be considered and included as our agreed access solution moves forward.

Having come to agreement with the Highways Agency in relation to how we best refine the design to optimum standard, and in the absence of any deliverable access alternatives, (as confirmed by the HA at our most recent meeting), RGP will be preparing a pre-planning application consultation for submission to West Sussex County Council and to inform subsequent consultation with the Highways Agency. The outcomes of that consultation will set out a formally agreed scope of works for RGP's Transport Assessment and Travel Plan for a Planning Application and the evolution of associated designs.












Yours sincerely,



Philip Russell
RGP



KEY

-  Housing (13.8 ha)
-  Primary School (IFE 1 ha)
-  Roadside facilities (1.3ha)
-  Employment (1.5 ha)
-  Local access in short term. In long term access for buses and emergency only
-  New junction & access from A27
-  Country Park/Public Open Spaces (for adoption by Adur DC)
-  Green Corridor
-  Formal Recreation Facilities
-  Brighton & Hove Albion FC training ground
-  Balancing Ponds

revision	date	description	own	other

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 Kent, TN1 2EP
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project	scale
New Monks Farm	1:5,000@A3
date	drawn by
18.07.2013	MD
checked	PRV
revision	

title	drawing number
Illustrative Masterplan	02-333-002

