

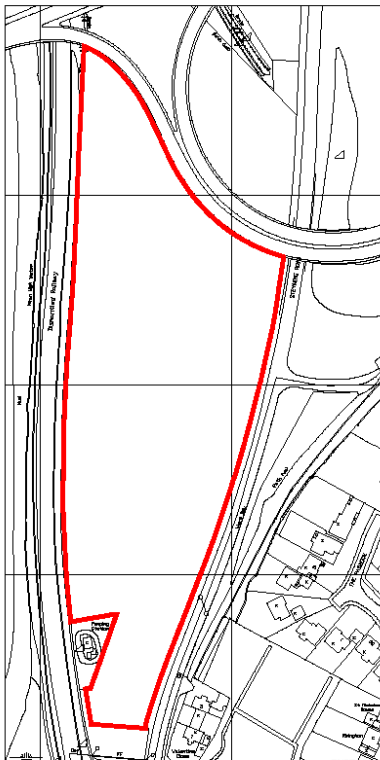
Ref No:1207

PROPOSED SUBMISSION ADUR LOCAL PLAN:

STATEMENT OF REPRESENTATION

ON BEHALF OF THE OWNERS (Cobbetts Developments Ltd and its Directors) OF:
Land between the River Adur & the Steyning Road (A283), Shoreham-by-Sea, West Sussex.

Hereafter referred to as the '**Steyning Road**' site



CONTENTS

- 1.00 Introduction
- 2.00 Key objections to Soundness of the Plan
- 3.00 Specific objections to Soundness in relation to Shoreham Airport, New Monks Farm and Steyning Road sites.
- 4.00 Suggested changes to ALP Policies
- 5.00 Summary

APPENDICES

- A Planning History
- B Sites Comparison Table
- C Lancing Gap Tidal Flood Map
- D Environment Agency Letter Dated 25th April 2012
- E Landscape Views of the Steyning Road Site
- F FRA for the Steyning Road Site
- G Current Scheme for the Steyning Road Site (showing re-alignment of the TWS)
- H EA's original preferred option for Reach 3 of TWS

REFERENCES

- ALP** Adur Local Plan
- CDL** Cobbetts Developments Ltd
- NPPF** The National Planning Policy Framework (March 2012)
- UFS** The Urban Fringe Study (December 2006)
- ELR** The Employment Land Review (June 2011)
- TWS** The Environment Agency's Adur Tidal Wall Scheme
- LES** The Landscape & Ecology Study (November 2012)
- NCS** Nationwide CIL Service - Adur District Council Whole Plan & Community Infrastructure Levy Viability Assessment (November 2014)

1.00 INTRODUCTION

1.01 This statement of representation, in respect of the Submission Adur Local Plan (ALP), has been prepared by Thornton Architecture + Design on behalf of Cobbetts Developments Ltd and its Directors (CDL), who together own the Steyning Road site (also referred to as 'The Gateway site').

1.02 This representation takes the ALP Policies individually and as a whole in each of its objections as to the SOUNDNESS of the Plan and how these objections relate to specific sites within the Lancing local green gap named below;

1.03 Sites within the Lancing Strategic Green Gap



Map Key:

1. Monks Farm – Strategic site allocation for Housing & employment
2. Shoreham Airport – Strategic site allocation for Employment
3. Steyning Road – Proposed site allocation for Housing & employment

2.00 The key objections as to the SOUNDNESS of the Proposed Submission Adur Local Plan (DLP) are:-

- **Not consistent with NPPF:** the plan does not consistently meet all its obligations under the National Planning Policy Framework (NPPF): and specifically, it does not '*positively seek opportunities to meet the development needs of [the] area*' (NPPF 14). This is amply demonstrated within the "Objections to the exclusion of the Steyning Road site", highlighted later in this representation;

- **Not positively prepared:** the plan does not fully meet the objectively assessed housing or employment needs of the District. There will be a shortfall of around 87 dwellings per year over the plan period. Furthermore, the Council will not be able to demonstrate that it has made every effort to meet its full housing needs or that it has properly considered all reasonable alternatives by excluding the Steyning Road site, which when measured against the same evidence based criteria as all the other strategic land allocations is the least constrained overall (see appendix B – Site comparison table);
- **Not justified:** the plan has not presented robust or credible evidence to support the allocations of strategic housing and employment at Shoreham Airport or New Monks Farm nor presented robust or credible evidence to discount the Steyning Road site;
- **Not consistent:** the plan has not been consistent in its evaluation of the evidence based studies, or fair in representing their conclusions, when assessing all reasonable options for strategic land allocations, instead, preferring to favour a small number of larger sites, despite their obvious and significant constraints. (see appendix B – site comparison table) By doing so the APL sacrifices large areas of the Lancing Local Green Gap at far too high a cost financially, environmentally and visually for the benefit presumed;
- **Not deliverable:** the background evidence to the plan shows that there are considerable delivery risks associated with the allocation of land at Shoreham Airport due to the dependency of the TWS, the timescale and funding of which is not guaranteed. There are also considerable delivery risks, based on economic viability, with the site dependent on a large amount of infrastructure, including a new roundabout and internal access road to be shared with the proposed new land allocation at New Monk Farm.
- **Not deliverable:** Further delivery risks are evident with Shoreham Harbour, also described by the NCS as having a negative viability, due to complicated site assembly and significant abnormal costs, including: decontamination; transport infrastructure; flood risk mitigation; and relocation of existing businesses to appropriate alternative sites within the district and neighbouring districts. The NCS concludes that Shoreham Harbour has a negative viability which based on the Commercial and Residential Viability Appraisals (combined) would make a net development loss of more than £10M (based on zero CIL rate). According to the NCS report the viability of the Shoreham Harbour is therefore dependant on future government funding (Ref. NCS Chapter 6.10. p38) which would be reasonable to conclude cannot be relied upon.

3.00 **OBJECTIONS TO SOUNDNESS IN RELATION TO THE FOLLOWING POLICIES AND STRATEGIC SITES**

3.01 **Policies 4, 7 & 13 - strategic site allocation of 15,000sqm of employment space on the airfield at Shoreham Airport:**

- a. Allocation of this site is not supported by evidence from the background studies commissioned by the Council and is inconsistent with the Submission ALP's vision and objectives (V7/O7) to protect the setting and landscape of the South Downs National Park (SDNP), river Adur and the local green gaps. The airfield lies within the Local Green Gap between Lancing and Shoreham and west of the River Adur. Future development of this site on the scale proposed would have an adverse impact on the purpose of the gap, which is to maintain openness and avoid coalescence of the settlements of Shoreham and Lancing, as set out in Policies 2 & 13. The proposal to allocate this site would significantly narrow the gap. The Urban Fringe Study 2006 (UFS) reports that '*Area 3 (Shoreham Airport) makes a significant contribution to the openness of the strategic gap. Despite the built up nature of the airport and nearby employment uses, there is little scope for further development outside of these current developed areas without prejudicing the wider open nature of the gap*' (Chapter 6.28 p.53).
- b. Policy 13 states that "*any development in the countryside should not result in a level of activity which has an adverse impact on the character of the area*". And yet all the

evidence based studies concur that this site allocation will have an adverse impact.

- c. The UFS 2006 concludes; *'Any major new development in the area north of the railway line [within the Lancing gap] would be readily visible when viewed from the National Park, and be visible from other parts of the gap. This would adversely affect the integrity of the gap, reduce the sense of separation between settlements, and have a negative effect on the landscape of the area'*. (Chapter 6.27 Visual sensitivity P38).
- d. The Landscape & Ecology Study classifies the area as having a Medium-High impact on Landscape character sensitivity. The report states the LCA is *'highly vulnerable to change'* and that *'the extensive open landscape makes a strong contribution to the impression of open, extensive green space...enhancing the sense of separation between Shoreham and Lancing'*. The report describes the open green landscape of the airport as being *'the focus of longer high sensitivity views from the SDNP' and that the area 'has exceptionally high visual sensitivity'*. The report concludes that mitigation of the visual impact of any development at this location would be very difficult.
- e. Chapter 11.4.2 Sustainability Appraisal (SA) of the Adur Local Plan outlines its reasons for selecting the area in the north east of the airfield for employment allocation but states; *"Development would be visually intrusive and the landscape has a low capacity to accommodate this type of development without adverse effects on the character of the landscape and the way it is perceived'*.
- f. NPPF also states that plans should resist development where *"any adverse impacts of doing so would significantly and demonstrably outweigh the benefit, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.'* In this case, all the evidence based studies have highlighted the adverse impacts on the integrity of the gap and the landscape and visual sensitivity from within the area and from key viewpoints from within the National Park. The Council should regard these adverse impacts as significantly and demonstrably outweighing the benefits, particularly when alternative sites are available, such as the Steyning Road site, which is less constrained and more deliverable (see site comparison table, appendix B).
- g. 80% of the site lies within Flood Zone 3b defined as 'functional flood plain' and at a higher risk of flooding than the Steyning Road site. (See Appendix C – Lancing Gap Tidal Flood Map) NPPF paragraph 100, states that this type of land should be safeguarded from development where it is required for current and future flood management (also APL Policy 13).
- h. Future use of the airfield land for development is dependent on the £25m Adur Tidal Wall Scheme (TWS) raising the existing flood risk from Category 3b to 3a before it can be properly considered. The Steyning Road site to the east of the river is already categorized within Flood Zone 3a. Therefore, under the sequential test, (NPPF paragraph 100), the proposed land allocation within the airfield should be discounted by more suitable sites such as the Steyning Road site, which is already at a lower risk of flooding. However, the Submission ALP supports the implementation of a TWS that will increase the flood risk to the Steyning Road site rather than secure and enhance its long term viability. (See Appendix D – Environment Agency Letter, confirming that their preferred strategy could be influenced.)
- i. The latest Strategic Flood Risk Assessment (SFRA) final report states under paragraph 4.3.3 *'recent modelling to test the effect of building the west bank Adur Tidal Walls showed that, if the walls were built along the west bank, the depth of flooding, hence risk, increases on the east bank. This information suggests that the west bank area of the Adur (including Shoreham Airport) provides a degree of storage at present and should, based on the evidence available, [still] be considered functional [flood plain]'*. This is contrary to the criteria that must be met by an Exemption test, where a flood risk assessment must demonstrate that the development will be safe without increasing flood risk elsewhere and where possible will reduce flood risk overall. It is further contrary to NPPF (paragraph 100)

'safeguarding land from development that is required for current and future flood management'. The EA's current preferred option for the northern reach of their scheme will result in increasing the risk of flooding to the Steyning Road site (currently at a lower risk category than the Shoreham airfield) and the surrounding area of the A27/A283 interchange.

- j. The Employment Land Review 2011 (ELR) site assessment rated the Shoreham Airport site inadequate for internal road access and poor for public transport provision under accessibility and poor for access to amenity. Funding for a major road infrastructure upgrade with a new roundabout at the Sussex Pad and a link road through the airfield to the site will be needed to rectify this. It would depend upon;
 - i. funding to facilitate these infrastructure improvements that will not be generated from piecemeal development and where wholesale development is very unlikely and delivery at all is a major risk;
 - ii. access onto the A27 where vehicle traffic movements already exceeds capacity. This will be the case even if the site provides local employment because of poor pedestrian and public transport links to the airfield.
- k. The NCS report concludes that the Shoreham Airport land allocation has a negative viability and based on the Commercial Viability Appraisal (NCS, appendix 3) would make a net development loss of just over £3M (based on zero CIL rate). Therefore, funding for the necessary transport infrastructure would have to come from either, public funding or from New Monks Farm. The NCS report casts some doubt as to how and where this funding would come from and that discussions are 'on going' as to how this will be resolved (NCS: Footnote to Chapter 6.2, p36 - Strategic Viability Appraisals and Chapter 7.14, p42 - Conclusion & CIL Rates). The Land is also subject to a section 106 agreement which restricts development for further employment uses.

3.02 **Policy 5 - Strategic Site Allocations of housing and employment at New Monks Farm**

- a. Allocation of this site is not supported by evidence from the background studies commissioned by the Council and is inconsistent with the Submission ALP's vision and objectives (V7/O7) to protect the setting and landscape of the South Downs National Park (SDNP), river Adur and the local green gaps. The site lies within the Local Green Gap between Lancing and Shoreham. Future development of this site on the scale proposed would have an adverse impact on the purpose of the gap, which is to maintain openness and avoid coalescence of the settlements of Shoreham and Lancing, as set out in ALP Policy 2 & 13. The proposal to allocate this site would significantly narrow the gap. The ALP (paragraph 2.47) recognises the sensitivity of this site and states that *'Marsh Barn Lane is a natural landscape 'edge' and that the fields to the east of this lane form part of the central landscape of the Gap and make an important contribution to its sense of openness and 'greenness'.* (LES) Any development beyond the 'natural landscape edge' of Marsh Barn Lane should be resisted. The ALP states in paragraph 3.45 that the boundaries to Local Green Gaps should follow physical features on the ground. Not to do so would also be inconsistent with NPPF Chapter 85 when defining boundaries by *'using physical features that are readily recognisable and likely to be permanent'*.
- b. The majority of the site is Grade 1 agricultural land. Allocation of this land for development is inconsistent with NPPF Chapter 11, 'Conserving and enhancing the natural environment' (paragraphs 109, 110 and 112). Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of higher quality. The UFS and SA for the Steyning Road site confirm the site as having a lower agricultural land quality when compared to New Monks Farm (see appendix B – site comparison table). Furthermore, plans should allocate land with the least environmental or amenity value and protect valued landscapes and soils. The ALP recognises that Policy 5 (Allocation of land at New Monks Farm) has some potential for conflict with a number of environmental objectives regarding biodiversity, historic environment, countryside, pollution and flood risk.

- c. Access to the site will require major road improvements including a new roundabout at the Sussex Pad and link road to the site along the northern border of the green gap. The requirements for such major infrastructure further constrain delivery of this site.
- d. The northern part of this site is located adjacent to the noisy A27 trunk road. The ALP states that a noise assessment and appropriate mitigation may be required. Yet the conclusions of the Sustainability Appraisal for the Steyning Road site states that the proximity of the A27 is a reason for excluding it from housing allocation, even though the noise will not impact the site to the same extent as at New Monks Farm because of the road's elevation.

3.03 **Objections to the exclusion of the Steyning Road site (Land between Steyning Road and the river Adur) size: 2.48 hectares, from the strategic land allocation**

- a. In terms of justification the Local Authority has commissioned a number of studies to help inform their decision making in the preparation of the Local Plan: these include the Urban Fringe Study 2006, Landscape & Ecology Study 2012 and site specific Sustainability Appraisals (SA). The conclusions of all these reports provide clear evidence to support the allocation of the Steyning Road site ahead of the proposed site allocations at New Monks Farm, Sompting and Shoreham Airport. (See Appendix B – Sites Comparison Table) Therefore, the ALP has not demonstrated that it has adopted the most appropriate strategy, when considered against all the reasonable alternatives, by its exclusion of the Steyning Road site, as the UFS suggests:

The UFS Conclusions Chapter 8 p84.

- i. Based on the sequential approach and standard sustainability objectives, those sites which would logically come forward first are likely to be those that;
 - ii. do not have significant landscape or environmental impacts
 - iii. are easier to deliver, not requiring significant infrastructure or complicated design and site assembly
 - iv. are more accessible in terms of services and transport
 - v. are less liable to flooding
- b. The report concluded that there were 10 sites overall which the landscape assessment suggested had potential as development sites. These sites fell into two main categories; sites with lower impacts and more constrained sites, which included the larger sites (including the area of New Monks Farm). Among the lower impact sites is the Steyning Road site, which the report concluded '*would be best suited to employment uses*'. The report further states that '*the sites identified in this report are believed to be better alternatives to development [than] elsewhere in the Gap and urban rural fringe*', including the area for strategic allocation of employment land at the airport, which was discounted at an earlier stage in the assessment process.
- c. Despite the UFS's suggestion that a '*high quality employment use may be appropriate in such a key gateway site*' and that it '*would function well as an employment area*', the ELR failed to include this site within its scope of consideration. The ELR concludes that 'the quality of sites assessed [within its report] is sub-standard', and that 'there is a need to identify additional high quality sites to meet market demand'. The Steyning Road site is one such site, which should have been included within the ALP.
- d. The LES concluded the site has a 'medium-low' impact for overall visual sensitivity and the UFS assessed the site as having a 'low contribution to the landscape' and 'low importance to the strategic gap. This is the lowest rating of all the sites assessed. (See Appendix B – Sites Comparison Table) The site is cut off from the gap by the natural boundary of the river Adur to its west and the Ricardo industrial site and described in the UFS as having

'tenuous visual relationship' with the rest of the gap and by the LES as being 'disconnected' from the gap. The site's exclusion from the local green gap would be consistent with NPPF Chapter 85, where local authorities should:

- i. ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
 - ii. not include land which it is unnecessary to keep permanently open;
 - iii. where necessary identify in their plans areas of safeguarded land between the urban area and the green belt, in order to meet longer-term development needs stretching well beyond the plan period;
 - iv. define boundaries clearly using physical features that are readily recognisable and likely to be permanent.
- e. The site has a 'relatively enclosed character' (Landscape & Ecology Study p.19) due to the steep slopes of the cuttings surrounding the junction to the north and east, the dominant structure of the raised junction itself and the raised flood embankment topped with vegetation to the west. Consequently, the Steyning Road site does not afford any meaningful views of the site other than by "low sensitivity viewers" from the A27 flyover itself, when travelling at speed and the A283 where it runs along the side of the site. (See Appendix E – Landscape Views).
- f. The UFS graded the agricultural land quality and environmental impact as both 'low'. (See Appendix B – Sites Comparison Table) Therefore, inclusion of this land in the Local Plan's strategic site allocation would be consistent with NPPF where plans should allocate land with the least environmental or amenity value (Chapter 11, Conserving and enhancing the natural environment, paragraph 110).
- g. The site is not reliant on significant transport infrastructure and consistent with the NPPF Chapter 4. 'Promoting sustainable transport' in that it can demonstrate the need to travel can be minimised by the use of sustainable transport modes, due to its location beside the existing bus route along Steyning Road. The site is also immediately bounded to its west by a national cycle route and footpath that connects with the town centre. The town centre and railway station are both located 1.3km away. (See Appendix B – Sites Comparison Table)
- h. Site Access – the site adjoins the Steyning Road. Minimal work would be required in widening the road to provide a vehicle waiting lane for turning and for the 30mph limit to be moved closer to the A27 roundabout junction. The Employment Land Review 2011 (conclusions 7.20) identified the need for sites with good and immediate access to the A27 trunk road: '*The accessibility of the current portfolio of sites to the strategic road network is a key concern. Thought needs to be given to the allocation of land close to and with good access from the A27 in particular, to support the local economy*' – The Steyning Road site is ideally located just to the south of the A27/A283 interchange.
- i. The site is currently located mostly in Flood Zone 3a, with a small area in 3b, broadly the same as the allocated site of New Monks Farm and significantly less constrained than the allocated site of Shoreham Airport, which is categorized as functional floodplain 3b. (See Appendix F – Flood Risk Assessment). The Environment Agency are currently working with the site promoters to bring forward a scheme that would afford greater protection of the southern half of this site, which is considered by the site's promoters as suitable for up to 50 housing units. This is subject to certain conditions being met (See Appendix D – Environment Agency Letter) including delivery of wider opportunities and benefits where possible. Given that the ALP has highlighted the scarcity of unconstrained land for development within the District as a whole and that it is not able to meet its own objectively assessed housing needs target, it seems of paramount importance to safeguard this site for future development.

- j. Development of this site would be consistent with the NPPF on sustainable development bringing economic, social and environmental benefits to the district.

Economic:

- i. The Adur Employment Land Review 2011 noted that the supply of land and premises for employment in the district is very constrained and on the whole of relatively poor quality. The Steyning Road site was identified by the UFS as land that would function well as an employment area and that it would be suitable for development for high quality employment use.
- ii. Development at this site would be consistent with NPPF (chapter 2, 'Ensuring the vitality of town centres, paragraph 23) for allocation of appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available, and if sufficient edge of centre sites cannot be identified, set policies for meeting the identified needs in other accessible locations that are well connected to the town centre.

Social:

- iii. Supporting the community by providing economic benefits and/or housing needs.
- iv. Development of the site could provide better access to the river embankment and the open spaces of the green gap, National Park and coast by linking to the existing cycle way and footpath.

Environmental:

- v. The site could contribute to the costs of building the TWS and improvements to the A27/A283 roundabout.
 - vi. Extended TWS could provide more salt marsh along the river embankment.
 - vii. Accessible location linked to the town centre by footpath and cycle way; close to the railway station and the main trunk road of the A27; served by existing bus route into Shoreham along Steyning Road.
- k. NPPF chapter 6 – 'Delivering a wide choice of high quality homes', (paragraph 47) local authorities should 'identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% to ensure choice and competition in the market for land. This site is more deliverable and relatively unconstrained when compared to the preferred ALP site allocations.
 - l. This site is no more constrained by traffic noise or pollution associated with the A27 and A283 than proposed site allocations at Sompting, New Monks Farm, Ropetackle North and Shoreham Harbour. All such sites would be subject to noise impact studies and mitigation through design. In each of these cases the APL is prepared to accept that site design and layout can be used to mitigate against the impacts of noise. Therefore, the Steyning Road site should not be excluded from the strategic site allocation for housing on the basis of noise, where similar measures could be used. Furthermore the site's promoters are currently working with the EA on a flood defence scheme that would require a reduction in the A283's speed limit alongside the site from 60 to 30, thereby reducing noise & pollution.
 - m. Recent consultation with WSCC Highways and the Environment Agency shows that the EA's proposed tidal wall defence across the Steyning Road site (see Appendix G) cannot be delivered without residential development fronting the raised A283 over the TWS (see Appendix H) in order to justify its design:-
 - i. For the TWS to be build the A283 needs to rise up over it. The vertical change in road alignment to cross over this defence has been designed based on a road speed of 30mph.

- ii. WSCC Highways will not accept a change in road speed unless it can be shown that the nature of the road already influences low driver speeds.
- iii. Residential frontage onto the highway is accepted as a major influence on driver speeds, as accepted by WSCC Highways.

4.00 **SUGGESTED CHANGES TO ALP POLICIES**

4.01 **Spatial Strategy and the Local Green Gaps (ALP Policy 2)**

The Lancing Green Gap/BUAB should be redefined to release small quantities of land around its periphery and the remaining gap strengthened to secure its future long term.

To secure its future the new boundary should be redefined using the strongest existing physical features in the landscape, consistent with the NPPF (Chapter 9, paragraph 85) 'when defining boundaries, local planning authorities should: define boundaries clearly, using physical features that are readily recognisable and likely to be permanent'. These are:-

- The A27 Trunk Road to the North
- The River Adur to the East
- The Mainline Railway to the South
- The consistent and well defined built up urban edge of Lancing to the West.

All further proposed development within the redefined gap should be resisted and the open space retained as a functional flood plain.

4.02 **Strategic Site Allocation (ALP Policies 2, 4, 5)**

The Strategic Land Allocations should be amended, as follows:-

- a. The Shoreham Airport site should be removed from the strategic land allocation for employment or significantly reduced and re-orientated so that it is on the south side of the airfield, amongst the existing light industrial buildings and screened by the railway embankment to the south.
- b. The New Monks Farm site should be restricted to development east of Marsh Barn Lane only. The L&ES states *that 'The fields between the edge of the built-up area of Lancing and Marsh Barn Lane contribute little to the landscape setting of Lancing or the integrity of landscapes within the Strategic Gap'* but the study goes on to describe Marsh Barn Lane as a *'natural landscape edge'* and that the fields to the east of this lane form part of the central landscape of the Gap and make an important contribution to its sense of openness and 'greenness'.
- c. The Steyning Road site should be included within the strategic land allocation for housing and employment use as it is already less constrained and more readily developable than other sites already included in the Submission ALP.
- d. The Submission ALP should be amended to include a policy requiring the District to safeguard all potential available sites for future development use, given the constraints identified by the sea and the National Park on the District as a whole.
- e. A general emphasis should be placed within the Submission ALP on using more infill or back garden sites and on redeveloping existing sites with either greater density or taller buildings for housing and employment, which is the only long term sustainable solution given the constraints of the District.

4.03 **Flood Risk (ALP Policy 36)**

The Submission ALP should comply with NPPF (paragraph 100) by directing development (such as that proposed at Shoreham Airport) away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere and safeguarding land from development that is required for current and future flood management.

(The implication of the SFRA report is that improvement to the tidal defences to the west bank of the River Adur, in order to protect a functional flood plain, will adversely impact land to the east putting Shoreham Town; the Steyning Road site and the surrounding area of the A27/A283 interchange at greater risk of flooding when resources should be focused on improving protection to the east side of the River Adur and associated infrastructure. To do otherwise would be contrary to the NPPF.)

5.00 **SUMMARY**

- 5.01 This representation objects to the Submission ALP with regard to the allocation of land at New Monks Farm and Shoreham Airport for future housing development and employment uses within the green gap ahead of the allocation of the Steyning Road site, which has been identified as less constrained and more readily developable by independent studies commissioned by the Local Authority.
- 5.02 This representation can find no justifiable reason why the Steyning Road site is retained within the Lancing Local Gap within the ALP, given the evidence of the background studies, including the UFS and LES, both of which conclude the site has a low landscape value and low contribution to the gap. NPPF guidance also directs Plans to use the strongest possible existing physical boundaries to define gaps, which past planning inspectors have acknowledged in this case as the A27 and the River Adur.
- 5.03 This representation can find no justifiable reason why the Steyning Road site is omitted from the strategic land allocation within the Adur Local Plan, which under their 'Duty to Co-operate' should include all reasonable alternatives to meet their objectively assessed needs.
- 5.04 Evidence provided by the NCS and its appendices demonstrate that the Shoreham Harbour and Shoreham Airport strategic land allocations are economically unviable and consequently will be unable to contribute towards a CIL charge. In the case of Shoreham Airport the Council cannot be justified in allocating land that is dependent on both the TWS and provision of significant transport infrastructure, without making the developers contribute to their costs on a comparable level to the contributions imposed on other similar developments.
- 5.06 The NPPF requires Local Authorities to take decisions in a positive way to foster the delivery of sustainable development and look for solutions rather than problems (paragraphs 186). The Steyning Road site is demonstrably less constrained in comparison to other sites in the district across the full range of criteria set by the Council. However, the Submission ALP accepts that issues of flood risk, highways access and impact, ecology, landscape impact, etc., can be solved with design and technical solutions to be brought forward by all the more constrained sites, which have been included in its strategic land allocation. Therefore, there is no reason why the Steyning Road site should not also be supported and encouraged by the Local Authority to bring forward similar solutions to the same range of slightly less significant concerns. It also requires Local Authorities to work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area (paragraphs 187).
- 5.07 Flood protection policies must not make existing flood risks worse during the implementation of any proposed flood defence schemes. The Steyning Road site is at a lower flood risk than the airfield, because parts of the flood defence on the west bank of the River Adur are lower than those on the east side of the river. Therefore, so that the flood risk to Shoreham Town and the Steyning Roads site are not temporarily increased, the proposed flood defences to the east of the River Adur must be implemented before those on the west side of the river.
- 5.08 The Steyning Road site is available, accessible, deliverable and less constrained by the same measures of assessment applied to any comparable site that the Local Authority has put forward for strategic allocation. (See Appendix B – Sites Comparison Table) Therefore, the Steyning Road site:
1. should be included within the strategic land allocation for housing and employment uses within any adopted Local Plan;

2. should be removed from the Lancing local green gap;
3. and the Local Authority should support the proposed alignment of the Tidal Wall Scheme (by Thornton Architecture & Cobbetts Developments) to safeguard a longer term supply of potential developable land within the District.

APPENDIX A

PLANNING HISTORY

- 1970s Proposed showroom, workshop and petrol station relocation site to facilitate redevelopment of Ropetackle site.
- 1980 Purchased by current owners
- 1982 Planning application for a food retail store (J Sainsbury) refused
- 1983 Planning appeal for a food retail store (J Sainsbury) refused
- 1987 Planning application for a leisure complex refused
- 1994 Representation to Local Plan Inquiry
- 1996 The current Local Plan was adopted
- 2006 The Urban Fringe Study Local commissioned by the Authority Local identifies the Steyning Road site as the least constrained and most deliverable of ten sites recommended for consideration for allocation in the 2007 Local Plan
- 2007 Proposed Local Plan rejected by the planning inspectorate and relevant policies were saved from 1996 Local Plan.
- 2010 South Downs National Park formed and site removed from AONB
- 2010 The Environment Agency held initial consultation with owners on the proposed Tidal Wall Scheme
- 2011 Tidal Wall Scheme – preferred options published.
- 2011 Meeting with planners & planning policy representatives to discuss ways of bringing the Steyning Road site forward following the UFS ahead of the Draft Local Plan (May)
- 2012 Letters from EA offering opportunity to influence the TWS (April)
- 2012 Representation submitted in response to Draft Local Plan consultation
- 2013 Meeting with planning policy representatives (January)
- 2013 Representation submitted in response to Revised Draft Local Plan consultation

APPENDIX B

SITE COMPARISON TABLE

Comparison of sites based on conclusions of Local Authority evidence studies:

	[New Monks Farm]					
	Monks Farm	Saltworks*	Sompting North	Sompting Fringe	Shoreham Airport	Steyning Road
Urban Fringe Study						
Contribution to Landscape	MED-LOW	MEDIUM	HIGH	LOW	LOW	LOW
Importance to the Strategic Gap	MED-LOW	HIGH	HIGH	HIGH	HIGH	LOW
Agricultural land Quality	MEDIUM	N/A	N/A	N/A	N/A	LOW
Environmental impact	LOW	N/A	N/A	LOW	N/A	LOW
Flooding risk	MEDIUM	N/A	N/A	MEDIUM	N/A	MEDIUM

*Saltworks = Area within the New Monks Farm site to the east of Marsh Barn Lane

NB. Sites with N/A due to being discounted by the study as inappropriate after results of first two criteria

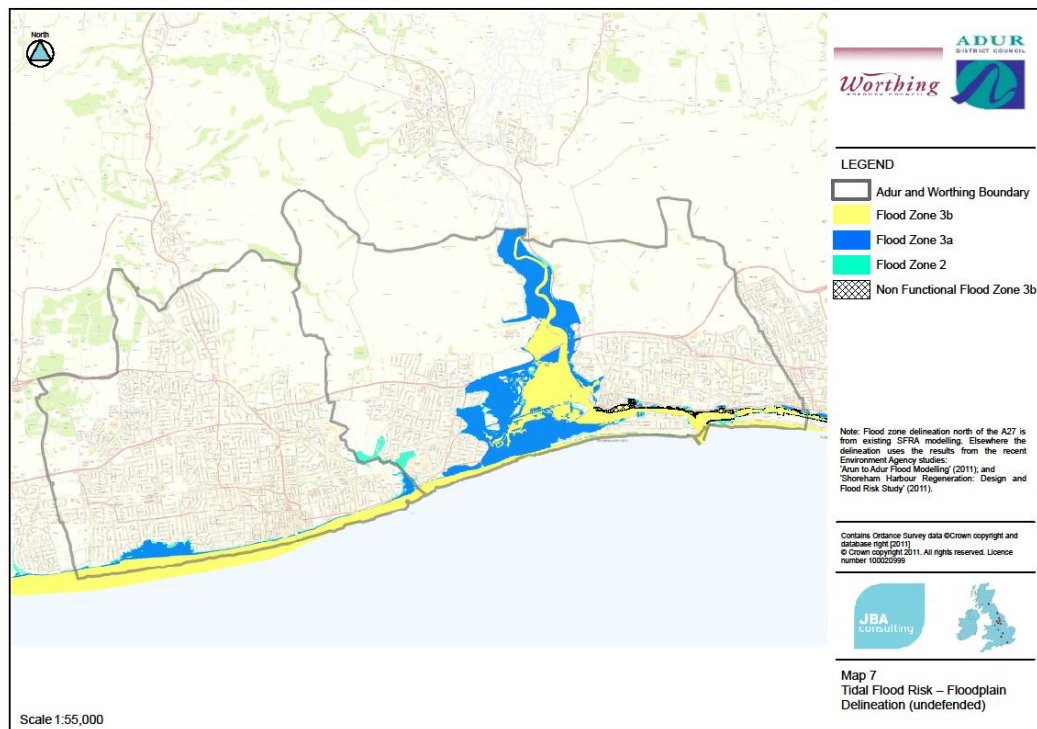
Landscape & ecology study	Monks Farm	Saltworks*	Sompting North	Sompting Fringe	Shoreham Airport	Steyning Rd
Landscape character sensitivity	LOW	MED-LOW	MEDIUM	MEDIUM	MED-HIGH	MED-LOW
Visual sensitivity	MEDIUM	MEDIUM	MEDIUM	HIGH	HIGH	MED-LOW
Overall landscape sensitivity	MED-LOW	MEDIUM	MEDIUM	MED-HIGH	HIGH	MED-LOW
Flood Risk Assessment	3a	3a	1	1	3b	3a

Site assessment criteria taken from the Employment Land Review (GL Hearn April 2011)

	Monks Farm	Saltworks*	Sompting North	Sompting Fringe	Shoreham Airport	Steyning Rd
Strategic road access	POOR	N/A	N/A	N/A	REASONABLE	GOOD
Public transport provision	REASONABLE	N/A	N/A	N/A	POOR	GOOD
Access to amenities	POOR	N/A	N/A	N/A	REASONABLE	POOR
Infrastructure requirements	SUBSTANTIAL	N/A	N/A	N/A	SUBSTANTIAL	MINIMAL
Neighbourhood/adacency issues	NO	N/A	N/A	N/A	YES	YES
Deliverability/viability	POOR	N/A	N/A	N/A	POOR	GOOD

APPENDIX C

TIDAL FLOOD RISK MAP



APPENDIX D

LETTER FROM ENVIRONMENT AGENCY DATED 25TH APRIL 2012.

creating a better place



Guildbourne House
Chatsworth Road
Worthing
BN11 1LD

Mr E.D. Thornton
Cobbelts Developments Ltd
Marehill house
Pulborough
West Sussex
RH20 2EA

Our ref: IMSO000648/1
Your ref:

Date: 25th April 2012

Dear David

Thank you, for meeting with our consultant and the record of the meeting is enclosed for your information.

I also wanted to take this opportunity to update you with the current progress on this matter since the meeting you had with and Darren Mllsom and confirm what requirements will have to be met to include the solution that was discussed to defend the site you want to develop within the Shoreham Tidal Walls Scheme (the scheme).

As Darren explained there is a potential to influence the preferred option, but there are requirements that have to be adhered to, they are as follows:

- A solution that can deliver opportunities and wider benefits where possible
- additional costs to the flood defence scheme are met by the beneficiary
- environmental and planning regulations are met

Once these requirements are met the scheme option for this reach could be changed to deliver your solution.

To move this proposal forward I suggest we meet with ADC planner to discuss the options. Please contact me to discuss.

Yours sincerely

Peter Borsberry

Project Manager
ncpms
Part of National Operations
Guildbourne House | Chatsworth Road | Worthing | BN11 1LD
External: 01903 83 2311



APPENDIX E

LANDSCAPE VIEWS OF THE STEYNING ROAD SITE



View: South East from Lancing College



View: South East from Lancing College (zoomed in). Seen in context of buildings behind.



View: East from Sussex Pad showing roof tops of Ricardo's works (Site centre)



View: East from A27 (Site centre right – obscured by hedge on flyover embankment)



View: South from East bound carriageway of elevated A27 flyover



View: South from A283 Steyning Road near junction with A27



View: South East towards St Nicholas Church (through local damage to hedgerow)



View: South along national cycle route showing distance between river (SSSI) and site



View: East from Toll Bridge showing view over site of Mill Hill



View: South from Mill Hill (Site centre – obscured by flyover)



View: North along Steyning Road



View: West from St Nicholas Church towards Lancing College

APPENDIX F

FLOOD RISK ASSESSMENT


Assessment of sites of

Adur – Shoreham /Lancing Gap (SLG19)


Map ref.	Shoreham-Lancing Gap	
Site of interest	SLG19 – Land at A283 Steyning Road	
Approx. NGR		
Area (ha)	Unknown	
Type		
Former land-use	Mainly Greenfield	
Description of site	Site SLG19 is located north of the railway, at the A27 Shoreham Bypass adjacent to the Steyning Road, to the east of the River Adur. The Shoreham Lancing gap is located between the towns of Shoreham by sea and Lancing, it is bounded to the north by the A27 and by the sea to the south. The area is relatively flat.	
Flood risk management policy	<p>Site is within the Adur CFMP study area. Site is on boundary between the CFMP Policy to 'reduce existing flood risk management actions (accepting that flood risk will increase over time)' and to 'take further action to sustain current scale of flood risk into the future.' Site also located within System Asset Management Plan area FR/11/S055.</p> <p>SMP Policy: hold the line. Maintain or upgrade the level of protection provided by defences.</p> <p>The relevant Coastal Defences Strategy is the Rivers Adur to Arun CDS.</p>	
Existing flood risk management at the site	<p>There are coastal defences along the beach at the south extent of the Shoreham-Lancing Gap. There are a combination of river and tidal defences along the River Adur. Defences of note include those to the south of the A259, with have an estimated standard of protection of 0.5%. There are also raised defences along the west banks of the River Adur adjacent to the airport.</p> <p>Site SLG19 is within flood warning area F3F4.</p>	
Sources of flood risk	Rivers	Medium to high risk, Flood Zone 2 and 3a. Small area on western edge of site in Flood Zone 3b. Historic flood incident recorded.
	Sea	Medium to high risk, Flood Zone 2 and 3a. Small area on western edge of site in Flood Zone 3b.
	Land	Medium to High risk. The Shoreham-Lancing gap has been identified as an area prone to surface water flooding.
	Groundwater	High potential for groundwater flooding. However there are no recorded historic incidents of groundwater flooding in the vicinity of the site.
	Sewers	Low risk. There are no recorded incidents of historic sewer flooding in the vicinity of the site.
	Artificial sources	Low risk as no artificial sources of flooding identified.
Possible strategic solutions	Improvements to existing surface water drainage may reduce flood risk. Strategic solutions are unlikely to reduce groundwater flood risk. Site specific measures required.	
Requirements of FRA	<p>Site is within Flood Zone 2, 3a, and a small part is within 3b. All development proposals at Medium to High risk from river and sea flooding should be accompanied by a FRA. In addition to this particular attention should be given to the risk of surface water and groundwater flooding.</p> <p>The site does appreciate some benefit from defences, although some areas remain at risk.</p>	

APPENDIX G

ENVIRONMENT AGENCY TIDAL WALL SCHEME



ADUR
DISTRICT COUNCIL



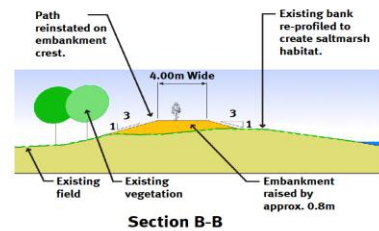
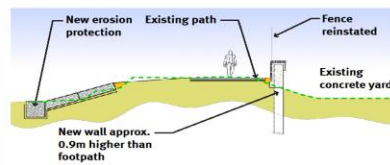
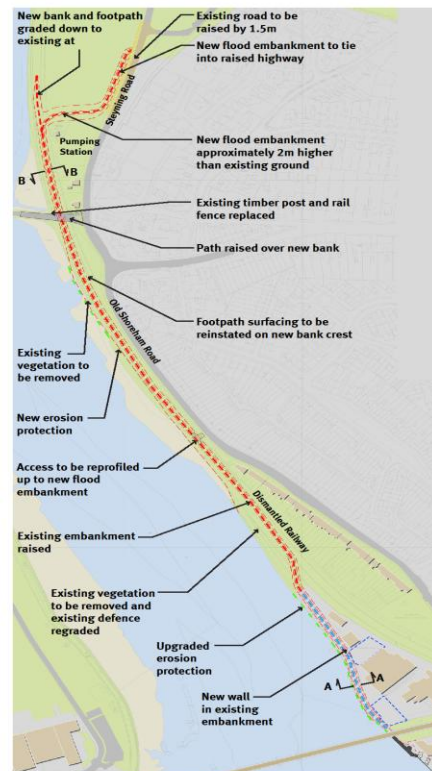
Environment
Agency

Adur Tidal Walls

Railway viaduct to the A27

Based on the height of the existing wall there is less than a 1 in 20 (5%) chance of a flood occurring in any year.

- We plan to raise the existing embankment along the line of the footpath. We will look for opportunities to create saltmarsh habitat along the river edge.
- Steyning Road will be raised to prevent flooding from the north.
- The new embankment will be wider at the top for maintenance.
- The exact alignment of the embankment between the river and the road will be confirmed during detailed design.
- We will replace the existing footpath and cycle route along the top of the raised embankment.



APPENDIX H

COBBETTS DEVELOPMENTS' PROPOSED (COST NEUTRAL) TIDAL WALL SCHEME

