

Adur Local Plan: Proposed Submission 2014 West Sussex County Council response

The Proposed Submission Adur Local Plan 2014 sets out a strategy for development in Adur up to 2031, seeking to achieve a balance in meeting needs for development while striving to protect and enhance the character and features of Adur. Following the current period for representations (Regulation 19 of the 2012 Town & Country Planning (Local Planning) (England) Regulations) Adur District Council is intending to submit the Local Plan to the Secretary of State in March 2015. A public examination heard by an independent Planning Inspector is expected to be held in June 2015.

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

Education

As set out in previous comments to the Local Plan, a site for a 1form of entry (fe) school with the possibility to expand to 2fe is required. This is based on a consideration of the strategic sites and allocation for smaller developments within the built up area of Adur. Land for a new primary school site required as part of the New Monks Farm development for both the lower and upper levels of development proposed is supported, however the policy currently identifies only 1ha of land is required, an area up to 2ha would be required if 2fe were needed. Therefore, additional text is requested for bullet point 4 of Policy 5 to read '*1 hectare of land to accommodate a 1form entry new primary school*' and the supporting text of paragraph 2.46 be amended to include the following at the end of the second sentence '*1hectare required for a 1form entry new primary school with additional land amounting to 1 hectare made available for the school to expand to 2 forms of entry if required*'.

As outlined in the IDP, a further primary school site may be required as part of the Shoreham Harbour strategic allocation. This will depend on the capacity available to expand existing schools in the local area. It is requested that under paragraph 6 of Policy 8 the following additional wording is added '*Educational provision will be considered and suitable provision offsite or onsite will be provided*'.

Flood risk

WSCC as the Lead Local Flood Authority (LLFA) support the Vision and Objectives relating to flood risk set out in the plan and will continue to work with the Local Planning Authority following earlier detailed comments made in the preparation of the Local Plan.

WSCC has advised that, as shown in the Adur Strategic Flood Risk Assessment, some of the allocated development sites are within areas of known flood risk. As required by the National Planning Policy Framework, the allocated sites must meet the Sequential Test and Parts 1 and 2 of the Exception Test. The LPA appear to be satisfied that existing flood risk issues at all allocated sites (but especially the Shoreham Harbour, Shoreham Airport and New Monks Farm strategic sites) could be technically and practically mitigated. WSCC have

reviewed the submitted evidence and can find no reason why the sites would not meet the Sequential and Exception Tests as set out. WSCC will continue to work with and advise the LPA on the site specific flood risk assessment elements of the exceptions tests for all allocated sites.

It is acknowledged that the Adur Local Plan has been developed without knowledge of the outcomes of the Lancing Surface Water Management Plan, currently being developed for WSCC. The SWMP covers a wider area than the proposed strategic sites in the Local Plan and when complete in early 2015, will offer a better understanding of local flood mechanisms and provide technical recommendations for local flood risk management. The SWMP evidence is likely to feed into the consideration of any planning applications (and possible planning conditions) for sites allocated within the Local Plan in this area. It is unlikely to affect the sequential or exceptions tests undertaken as part of the Local Plan process.

All technical evidence relating to flood risk for the allocation of sites within the Local Plan should be considered and Published for Submission of the Local Plan.

Heritage

There are welcome references to the historic environment, as well as to key surveys and reports through the Local Plan, including within the strategic allocation policies and supporting text. However, whilst Policy 17 covers all Heritage Assets it does not specifically mention scheduled ancient monuments. As their status (according to NPPF paragraph 132) is considered to be the equivalent of listed buildings of Grade I or II* status – i.e. the highest ranking – it is requested that this be amended. It is also noted that the Policies Map includes SSSIs and SNCIs however does not show heritage assets such as Scheduled Ancient Monuments. In the context of the acknowledged sensitivity of introducing a new A27 roundabout in possible proximity to a scheduled monument it is requested that these be clearly identified.

Minerals and Waste

Paragraph 1.6 correctly makes reference to both Minerals and Waste Local Plans in West Sussex, therefore in the interest of clarity an amendment to footnote 5 on page 4 should be made to read *'West Sussex Minerals Local Plan 2003. The County Council have prepared a Waste Local Plan jointly with the South Downs National Park Authority, adopted April 2014, and are currently preparing a new Minerals Local Plan, jointly with the National Park Authority.'*

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

In order to ensure the document is factually correct it is requested that '2003' is added to the end of paragraph 1.20 and footnote 8 on page 6 is removed.

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

Rights of Way

Considering the previous comments made and the importance of sustainable travel and linkages it is requested that additional wording is added to Policy 6 and its supporting text. We request that '*Access across the A27 to the South Downs National Park for pedestrians, cyclists & equestrians must be retained and where possible, enhanced*' is added to Policy 6 and '*New pedestrian and cycle networks should integrate with existing routes as far as possible.*' be added into the supporting text at paragraph 2.65 to ensure consistency with other policies in the document, Key Issue 7 and Vision and Objective 8 of the Plan.

Paragraph 3.43 should be amended to remove the last sentence which refers to the route being protected by rights of way legislation to ensure the document is factually correct.

Transport

West Sussex County Council supported the additional transport work undertaken as suggested in previous comments, in line with the removal of the Hasler site allocation proposal. The County Council has worked collaboratively to inform the Adur Local Plan and Shoreham Harbour Transport Study and on the basis of a technical assessment of the work carried out, supports its conclusions. There is reasonable confidence that the package of local transport infrastructure improvements and smarter choices measures (or a similar package of measures) is likely to provide sufficient mitigation so that any residual cumulative impacts would not be severe. This is the key test imposed by the NPPF.

Policy 8 paragraph 10, requires amended wording in order to reflect the preparation of the Transport Strategy, as set out in paragraph 2.101. It is requested that the wording of paragraph 10 be amended to read '*A Transport Strategy for Shoreham Harbour is being produced to support the Shoreham Harbour Joint Area Action Plan to mitigate impacts on the highway network and to promote sustainable travel behaviours. Development in this location must be in accordance with this Transport Strategy.*'

West Sussex County Council
November 2014