

Hearing Statement

On behalf of

New Monks Farm Development Ltd
Respondent Ref. 20

and

DMH Stallard LLP
Respondent Ref. 38

Hearing Issues 1, 2, 3, 5, 6 and 7

Prepared by DMH Stallard LLP

Hearing Statement
on Behalf of
DMH Stallard and New Monks Farm Development Ltd

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1. Introduction

1.1 This statement contains representations for New Monks Farm Development Ltd (NMFDL) in respect of the Adur Local Plan 2016 (ALP), specifically in response to Document ID/3 Rev 2 Issues and Questions.

1.2 In summary NMFDL:

- Endorse the overall strategy of the ALP
- Support the allocation at both New Monks Farm and Shoreham Airport
- Seek important main modifications to:
 - Policy 4 – enabling increased employment generating floorspace at both New Monks Farm and Shoreham Airport.
 - Policy 5 – enabling increased employment generating floorspace, a revised built up area boundary to take account of the above and ensure an appropriate and sympathetic residential layout taking into account constraints (Map 2).
 - Policy 7 – enabling increased employment generating floorspace at Shoreham Airport with consequential extension of the proposed allocation (Map 4).

1.3 It is considered that the ALP Sustainability Appraisal (SEIA) would need to be updated to take into account the impact of the suggested revisions to the ALP.

1.4 NMFDL in supporting the ALP consider the proposed allocations at New Monks Farm and Shoreham Airport provide a unique range of benefits to the future planning and well being of Adur District comprising; significant employment opportunities, strategic housing delivery, enhanced/extended gypsy/traveller provision, a large Country Park and flood mitigation for existing and proposed properties.

2. Issue 1 : The Duty to Co-operate (Legal Requirement) and the Council's Broad Spatial Strategy (policy 2)

1.4 - Is the ALP based on a sound process of sustainability appraisal and testing of reasonable alternatives, and does it represent the most appropriate strategy in the circumstances? Has the strategic site selection process been objective and based on appropriate criteria? Is there clear evidence demonstrating how and why the preferred strategy was selected?

2.1 NMF DL considers the ALP to be based on a sound process of sustainability appraisal. The methodology is sound and has played an appropriate role in the identification and review of sites for allocation within the ALP.

2.2 The ALP has focused on strategic level sites. This is consistent with the NPPF para 47 which affirms that in order to significantly boost the supply of housing, LPAs should "identify key sites which are critical to the delivery of the housing strategy over the plan period". Furthermore, the ALP is consistent with advice at para 157 of the NPPF which makes it clear that one of the crucial roles of Local Plans is the identification of broad locations for "strategic development".

2.3 NMF DL support the main strategic allocations of land for housing and employment floorspace at both New Monks Farm and Shoreham Airport. It is considered that no other site(s) in the Adur District could provide the same socio-economic benefits in terms of jobs, housing and infrastructure.

1.5 - Are all the components of the Council's spatial strategy (policy 2) justified and compatible with the principles referred to in paragraph 17 of the NPPF?

2.4 The allocation of land at New Monks Farm is supported and considered necessary, justified and compatible with paragraph 17 of the NPPF. Specifically, the allocation of land at New Monks Farm accords with the core planning principles as set out at paragraph 17:

- Setting out a positive vision (employment and housing)
 - Enhancing places (provision of Country Park)
 - Proactively drive/support sustainable economic development (delivery of employment and housing)
 - Taking full account of flood risk
 - Allocating land of lesser environmental value (not a nationally designated site)
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- Promotion of mixed use developments encouraging multiple benefits (employment, housing and leisure)
- Conserving heritage assets
- Actively managing patterns of growth to make fullest use of sustainable transport modes (buses, cycling, pedestrians)

3. Issue 2: Planning for Economic Growth (policy 4)

2.1 - The NPPF confirms the importance that is to be attached to building a strong competitive economy (e.g. paragraph 19). Has the Council attached sufficient weight to achieving this objective? If not what more should be done?

3.1 The Employment Land Review 2014 (ELR) concludes that there is an identified need for 60,000 square metres of employment floorspace.

3.2 In order to meet the employment aspirations of the plan it is considered that the policy should increase the allocations or at least indicate that the figures stated are minimum/"at least" figures.

3.3 It is considered that to ensure compliance with NPPF para 19 and deliverability of Shoreham Airport/New Monks Farm the allocations/policy area should be increased to accommodate additional floorspace.

2.2 - Policy 4 refers to provision being made at the 3 identified employment locations 'for a range of accommodation types'. Firstly how would a decision-taker know what 'type' of accommodation would be acceptable on a particular site and secondly how would the Council ensure, over the course of the plan period, that a satisfactory 'range' would be achieved?

3.4 The policy should maintain flexibility in terms of a full "range of employment types", particularly at the New Monks Farm site, as advocated in the NPPF (para 21).

3.5 Paragraph 2.44 of the ALP indicates that the Shoreham Harbour site is most likely to accommodate B1 uses. Shoreham Airport is most appropriate for non B1(a) uses, whilst New Monks Farm is justifiably a location for a flexible employment generating use, given its location away from existing commercial uses.

3.6 In order to take full account of para 18 – 22 of the NPPF it is considered that additional prescription within the policy is unjustified as it would act as a significant impediment to sustainable economic growth.

4. Issue 3: Housing Provision (policy 3); Housing Mix and Quality (policy 21); Affordable Housing (policy 22), Density (policy 23) and provision for Gypsies Travellers and Travelling Showpeople (policies 24 and 25)

3.9 - Has the relationship between economic growth in the District and the provision of new housing been adequately addressed?

4.1 Given the extent of net daily out commuting and the ELR findings, an increase in employment generating floorspace above the approximate figures in policy 4 is justified.

3.10 - Are the requirements of policy 21: Housing Mix and Quality, reasonable and justified? Has the Council properly addressed the housing needs of the elderly and people with disabilities?

4.2 Paragraph 4.29 indicates that the future delivery of market housing should reflect the following mix (with the Major Modifications submitted by the Council indicated by the figures in brackets):

- 1 bed dwellings 10% (5 – 10%)
- 2 bed dwellings 45% (40 – 45%)
- 3 bed dwellings 35% (40 – 45%)
- 4 bed dwellings 10% (5 – 10%)

4.3 Policy 21 goes on to state that new residential development should incorporate a range of dwelling types, tenures and sizes that reflect and respond to Adur’s identified housing needs and demands.

4.4 It should be acknowledged that the district wide housing mix, is just that and, consequently, the mix for individual sites should be considered on a site specific basis particularly because the major allocation at Shoreham Harbour is likely to result in the provision of primarily smaller dwellings, whereas the other allocations will have greater ability to provide larger units. Indeed the eastern edge of the New Monks Farm allocation will be required to be of a relatively low density to ensure a sensitive landscape approach in long distance views and in respect of the Country Park setting.

3.12 - Is the preferred mix of tenure (as set out in policy 22) viable, deliverable and justified?

- 4.5 Paragraph 4.40b and Policy 22 indicate a preferred tenure mix of 75% social/affordable rented and 25% intermediate housing.
- 4.6 In our view the suggested tenure mix is unsound. Whilst it is accepted that there is a paragraph later in the Policy which discusses viability evidence to be put forward to justify non-compliance with due percentage of affordable or the tenure mix, the Policy itself should also be the subject of viability testing.
- 4.7 The Council tested a different tenure split in 2014. The Council should be mindful that it is inappropriate to set unachievable policy obligations. Negotiating lower affordable housing provision/alterations to the tenure split inevitably incurs additional costs in terms of time and money which impairs housing delivery.
- 4.8 Given the imminent Housing Bill it would be sensible to remove the tenure split from the policy altogether ensuring the policy remains flexible and relevant in the future.
- 4.9 If it is considered necessary to include a tenure split then to allow enhanced viability and a balanced approach to delivery, it is considered that the policy should allow a 50/50 split between intermediate and affordable rent.
- 4.10 The fact that the built up area boundary east of the New Monks Farm allocation is shown as "indicative" is supported. However it is considered that the flexibility of the built up area boundary is essential in order to ensure that sufficient space is provided for homes, commercial floorspace, expansion room for the Primary School, and the existing Brighton & Hove Albion Elite Football Performance Centre whilst taking into account physical constraints. From the studies undertaken by NMF DL, which take into account the site constraints, it is necessary for the built up area to extend further eastwards at the north-east and south-east of the allocation. Notwithstanding the built up area boundaries indicative nature, it is considered that further adjustment is necessary to provide certainty and clarity (see map at Appendix 1).

3.14 - Is the Council providing sufficient support for people wishing to build their own homes?

- 4.11 NMF DL consider that if necessary small sites are the best location for self build. Indeed much of ADC's windfall supply is small schemes of 1 – 5 units within the existing built up area which would be most suitable for self builders.

4.12 It is not considered appropriate to stipulate a part of a major allocation for self build for reasons of; delivery, viability, design co-ordination and health and safety.

3.15 - Is the Plan based on up-to-date and reliable evidence of the needs of gypsies, travellers and travelling showpeople, and does it make deliverable provision to meet such needs (policy 24)? Are all the requirements of policy 24 reasonable and justified?

4.13 NMF DL can accommodate within the site improved facilities (not least removing the existing pitches from flood risk) and an increase in the number of pitches (12 currently – 16 proposed).

5. Issue 5: New Monks Farm, Lancing (policy 5)

5.1 - Are all the requirements of policy 5 reasonable, justified, viable and deliverable?

- 5.1 NMF DL consider the requirements under Policy 5 are justified, viable and deliverable, but only with revisions to the policy and proposals map and the support of LGF funding (subject to the comments at paragraph 5.25 below). It is our view that amendments to the Local Plan are essential to make the New Monks Farm allocation viable and commercially deliverable.
- 5.2 The proposed development of the site has been considered in relation to a site specific Flood Risk Assessment. It has become clear that the best option to develop the land is to maintain and enhance the majority of existing water courses through the site. As well providing a more natural hydrological solution, this approach would provide greater opportunities for ecological and landscape enhancements as part of the proposed allocation. In order to meet the proposed level of housing (600), school site with room for expansion, and flexibility to provide in excess of 10,000 m² of employment floorspace, an alteration is needed to the proposed Built up Area Boundary which is shown on the provided plan (Appendix 1). Consequently, the proposed built up area boundary is unsound.
- 5.3 We support the New Monks Farm allocation and in view of the Council's shortfall against their Objectively Assessed Housing Need summarised at Paragraphs 2.20 to 2.22 believe that the release of this land for development is essential. However, it is our view that Policy 5 as currently drafted is not sound because it fails to provide sufficient flexibility and is not considered to be positively prepared.
- 5.4 We support the wording of 'appropriate employment generating floorspace' as this provides flexibility with regard to the type of commercial floorspace provision, thereby ensuring the viability and delivery of the allocation. We would emphasise the need for flexibility to ensure that the development can accommodate "modern operator's requirements" and the need to recognise the significant employment opportunities associated with a range of uses not just traditional B Class operators.
- 5.5 The delivery of the allocation will require significant investment in infrastructure, principally in respect of the proposed roundabout from the A27 but also in respect of flood mitigation works. A full list of related infrastructure investment is set out below:
- Cost of purchase of land (including the cottages and barn) together with legal fees for purchase and SDLT

- Offsite Works including construction of the New Junction and amendments to the Sussex Pad Junction on the A27
- Improvements to non-motorised user crossing of the A27
- Service Diversions under the A27 to suit the new road layout
- Commuted sums for the ongoing maintenance of the New Junction
- On site earthworks including remodelling of filled areas, the creation of the Country Park and forming plateaux for both the residential and commercial developments
- Internal Access Roads leading from the New Junction to the Commercial Development and the Residential Development and providing access to the new Traveller site and to the Airport Boundary
- Foul Drainage Works including connection to the existing Foul Drainage system south of the railway
- Ground, surface and tidal flood alleviation works
- Landscaping to the Country Park
- Relocating the Traveller site including the creation of new pitches and connecting them to the mains sewerage, power and water supplies
- Provision of land for the school site with expansion space, levelling and provision of incoming services to the school site
- Provision of Incoming Services (Gas, Water, Electric and Telecommunications) to serve both the commercial site and the residential site
- S106 Contributions including provision for off site highway improvements and items included within the Infrastructure Delivery Plan
- Design/Planning/Agent/Legal Fees, Site Investigation Costs, Project Management, Security, Contingencies.

5.6 It is considered that setting a maximum limit on the amount of employment generating uses at New Monks Farm is too restrictive and not positively prepared, particularly given that the ELR sets out a requirement for 60,000 sqm of employment floorspace. In order that the Council can satisfy themselves that at least 10,000 m² of employment generating space will be provided at New Monks Farm this level should be referred to as a minimum. Clearly, should any future developer seek to provide additional floorspace, such provision should be treated positively, provided that it complies with

other policies within the ADLP, as well as guidance provided within the NPPF. Based on our site analysis, it is considered that there is no justifiable reason to limit the employment floorspace provision, either in terms of overall floorspace or in terms of the footprint of the development.

- 5.7 The proposed revisions to the built up area boundary at New Monks Farm are addressed in more detail within the accompanying landscape impact report (Appendix 3).

5.2 - How will the suggested phasing be secured?

- 5.8 It is considered that the planning application/S106/conditions will enable appropriate phasing to be secured.
- 5.9 NMF DL are working on the preparation of a Planning Application for the site and public consultation then submission is likely to take place early in 2017. If permission were secured in June 2017 the following is an indicative development timetable for individual elements of the scheme:

	Construction Starts	Construction Completed
First phase 250 homes	Sep-17	Dec-20
Flood, drainage and site infrastructure works	Sep-17	Sep-18
New gypsy and traveller site	Nov-17	Mar-18
A27 transport interchange	Mar-18	Apr-19
Community Building	Sep-18	Mar-19
Commercial / employment generating floorspace	Sep-18	Sep-19
School area and playing fields	Sep-18	Sep -19
New Country Park	Feb-19	Jul-19
Second phase 350 homes	Dec-20	Apr-25
Off-site infrastructure improvements	Contributions only	

5.3 - Have issues of flood risk in relation to this site been adequately addressed (see also question 13.5)? Has the advice in the NPPF (for example paragraph 100) been followed?

- 5.10 Survey work has been undertaken by NMF DL during the period April 2016 to date and additional survey data gathering will be extended to July 2017. Ground Investigations have been undertaken that inform the hydrogeological assessment of the area incorporating the ground survey and monitoring the level of groundwater. In addition an extensive survey of water levels in the watercourses over an extended period is well advanced. As a result, NMF DL are confident of being able to demonstrate that there is an acceptable and

deliverable foul and surface water drainage solution for the site, which will adequately mitigate flood risk from; tidal, fluvial, groundwater or surface water whilst helping to reduce flood risk in the residential upstream catchment.

- 5.11 We are working collaboratively with the Airport and EA, SWS, WSCC (as lead drainage authority) and have a continuing series of meetings to ensure robust drainage strategy is developed.

5.4 - What assessment has been undertaken regarding the impact of the proposed development on existing infrastructure, for example roads, schools, community facilities (including sports pitches), health services and utilities? How will it be decided what is an 'appropriate stage of development' with regard to the provision of a new A27 access? (last bullet point)

Transport

- 5.12 In preparing the Submission Adur Local Plan (2016), a number of transport impact assessments were undertaken to provide the evidence base to support the emerging Local Plan allocations, including New Monks Farm. The latest study is the Adur Local Plan Second Addendum: Revised Reissue September 2016 Transport Study, commissioned by Adur and West Sussex County Council, which considers the transport impacts of the up to date Local Plan development and growth scenarios, including the proposed allocation at New Monks Farm. The Transport Study identifies a number of junctions on the local highway network that are predicted to require improvement and puts forward schemes of mitigation for each junction. The Study concludes that the improvements to road infrastructure tested, in combination with sustainable transport initiatives, provide significant improvement to junction performance and the journey times on key routes such as the A27 and the A259 corridors. Overall the Study concludes that the levels of development promoted through the Submission Adur Local Plan (2016) can be accommodate in terms of traffic impacts and road safety.
- 5.13 The traffic modelling work used to inform the Transport Study provides input to the latest Infrastructure Development Plan (IDP) (October 2016). The IDP sets out contributions to the proposed transport interventions required from each of the Local Plan allocation sites including New Monks Farm and Shoreham Airport, on the surrounding highway network.
- 5.14 Capacity assessments have been undertaken of the proposed site access roundabout on the A27, which demonstrate a solution can be provided to accommodate Local Plan development, including the specific allocations at New Monks Farm and Shoreham Airport.
- 5.15 Transport Assessments and Travel Plans will be prepared in accordance with the NPPF to support development at New Monks Farm and Shoreham Airport. These will include phasing of development, to ensure that the A27

Access junction will be provided at the appropriate time. These documents will be consulted on with Highways England and with West Sussex County Council as relevant highway authorities. The delivery of the A27 access at the appropriate time can be dealt with by imposing conditions on these developments. A collaborative approach is being adopted between the developers of New Monks Farm and Shoreham Airport to deliver the access strategy. A Transport Steering Group has been set up between these developers, Adur Council, West Sussex County Council, and Highways England to ensure that transport matters are dealt with in a positive and proactive manner to bring forward development on these sites.

Education and Skills

- 5.16 The Proposed Development will have a significant impact on education and skills in the local area. Using the West Sussex County Council child yield formulae, the completed development could expect to contain 181 residents who require school places. This includes 97 primary school students, 69 secondary school students and 15 sixth form students.
- 5.17 The demand for places will be staged according to the progress of the development, but assuming a uniform build period of nine years, there is likely to be a demand for around 20 additional school places each year (eleven primary school places, eight secondary school places and one sixth form place).
- 5.18 Given the scale of the Proposed Development, it contains plans to provide a one form entry primary school on 2.044 hectares on the site. This will provide places for up to 210 primary school students, based on 30 students per year group. The development proposals provide space for the school to be expanded to a two-form entry in the future, in line with Local Plan requirements.
- 5.19 The development will also have an impact on secondary school provision, although this will not result in a requirement for a new school. Instead, existing secondary provision will be expanded to absorb the expected population increase, including that contributed by the Proposed Development. The application will negotiate the final S106 contributions for education once the planning application has been submitted and subject to financial viability testing.

Health and Well-Being/Community/Leisure

- 5.20 The addition of around 1,300 new residents to the local area is likely to have a significant impact on local health and well-being services. The extent to which this is the case will depend on the demographic and age profile of the New Monks Farm residents and the proportion who are new to the District.

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- 5.21 On the assumption that 75% of the residents on the Proposed Development will be new to Adur, there will be one GP per 1,565 patients in the District, compared with 1,541 currently. This remains well below the national average (1:1,800) and suggests that there is capacity within local GP services to absorb the population increase that the Proposed Development is expected to deliver, at least on a District wide basis. However, consultation feedback suggests that there is a shortage of doctors and dentists locally, but, to date, no data has been provided to support this.
- 5.22 The proposed development does include provision for a 250 sq.m Community Hub, the uses of which have yet to be determined. This could be used to provide additional health services, perhaps on an outreach basis, should the need be identified.
- 5.23 The extensive open space on the Proposed Site, the cycle lanes and footpaths and links to and from the South Downs National Park all provide new opportunities for local residents to engage in outdoor and health enhancing activities. The area has good local provision of formal sports pitches including the all weather/floodlit facility at the BHAFc Elite Football Performance Centre which is available for community use.
- 5.5 - Is it sufficiently clear what new infrastructure is required, who is going to fund it and how it relates to the anticipated rate and phasing of development (PPG paragraph 018 under Local Plans)?**
- 5.24 See answer to 5.2 above.
- 5.25 It is hoped to be able to provide additional information on viability of both the New Monks Farm and Shoreham Airport sites prior to the Hearings. One of the reasons for delaying the submission of this information is that a decision on Local Growth Funding is awaited and due prior to the end of January 2017.
- 5.26 The Adur Place Plan, co-produced by the Adur District Council and WSCC, includes New Monks Farm as a priority area that will deliver higher GVA, jobs, homes and employment space. Adur District Council is seeking £9.43m Local Growth Funding to lever in £44m of private sector matched funding to deliver the economic growth outcomes in Shoreham.
- 5.27 Local Growth Funding will be used specifically for the provision of the essential road infrastructure to unblock the development of this area of Shoreham. A new road junction on the A27 is required to provide access of sufficient capacity for new homes and commercial developments. Once complete, the commercial development at Shoreham Airport is likely to follow, funded by private sector investment.
- 5.28 The project is to develop a strategic employment and housing growth centre in Shoreham. The new road infrastructure will also have wider benefits for
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all current residents of the area and importantly local businesses; for example:

- One of Coast to Capital's internationally award winning employers, Ricardo, who in addition to 4% of total revenue invested in research & development, have invested circa £5m each year on capital expenditure at their Shoreham facility for the past five years. As a major employer in Shoreham and the Greater Brighton City Region, Ricardo currently employ c700 people across a range of higher skilled, technical, engineering and professional services specialisms;
- Lancing College for their staff, students and parents with an easier right and left turn to alleviate congestion;
- Staff and students at a Northbrook College campus - an award winning Further Education College; and
- The c50 aviation businesses and other companies located at Shoreham Airport.

5.29 Without investment in the new road infrastructure the ability of the private and public sectors to develop and invest in the Shoreham Airport area is unlikely.

5.6 - Would any element of the proposed development have a detrimental impact on the setting of the WWII Trainer Dome Scheduled Monument?

5.30 It is accepted that the proposed development would have a moderate impact on the setting of the Trainer Dome mainly due to the link road to the airport.

5.31 Removal of the Trainer Dome from the airport's restricted zone will provide the opportunity for the public to access the monument. In consultation with Historic England, West Sussex County Council and Arun District Council, a scheme will be developed that commissions a conservation management plan, facilitates external public access and delivers heritage interpretation. The removal of the raised area from around the dome would have a beneficial effect with the advantage of making the dome more visible.

5.32 The adverse effects of a new service road beside the trainer dome will be mitigated by the access it will allow to the monument and the opportunities it affords for heritage interpretation.

5.33 Reference should be made to the "acta" report which considers the trainer dome to be of low value. However, the ALP allocations give an opportunity to enhance the immediate setting.

6. Issue 6: Shoreham Airport (policy 7)

6.1 - Are all the requirements of policy 7 reasonable, justified, viable and deliverable?

- 6.1 The allocation of 15,000 m² of B1/B2/B8 floorspace is welcomed and supported. However, given the ground conditions and the need for a new access road, the floorspace would need to be increased to 25,000 m² along with the suggested revisions to the proposals map (see paragraph 8.6 below) and the support of LGF funding (subject to the comments at paragraph 5.25 above) to constitute a viable and commercially deliverable scheme.
- 6.2 The extension of the site to the south (as shown on the map at Appendix 2) could accommodate the necessary level of floorspace. Subject to careful siting and design it is considered that the additional floorspace could be accommodated without unacceptable landscape or other impacts.
- 6.3 The owners of the airport and New Monks Farm are working together to ensure delivery of these important strategic sites. Subject to the suggested policy revisions and LGF funding the sites are viable.
- 6.4 The collaborative working will ensure the delivery of the A27 Access to allow both developments to come forward, including facilities for pedestrians, cyclists and equestrians. The A27 Access would be designed with sufficient capacity to accommodate the larger development (proposed at both New Monks Farm and Shoreham Airport), with preliminary capacity assessments demonstrating that this is achievable. Improvements at the A27/Grinstead Lane are deliverable as indicated in the Adur Local Plan Second Addendum: Revised Reissue September 2016 Transport Study, however, further assessment work would be required via a Transport Assessment for the development.

6.3 - What mitigation measures will be required in order to retain ecological value? Will their delivery have any implications in terms of the viability and delivery of the policy?

- 6.5 Initial survey work undertaken by the owners indicates that the site has no ecological constraints.

7. Issue 7: Countryside and Coast, including local green gaps (policies 13 and 14)

7.1 - Has the Council achieved the correct balance between meeting housing needs and protecting the setting of settlements within the District?

7.1 Yes subject to comments made under policy 2, 5 and 7.

7.3 - Is the prevention of the coalescence of settlements a reasonable and justified objective?

7.2 Yes, but the suggested revisions to the proposals map would not impact unacceptably on the gap in visual terms, nor would they lead to coalescence of settlement.

8. Conclusions

8.1 A number of revisions are required to make the plan sound and meet soundness test 1 (positively prepared). These are set out below.

8.2 The wording of Policy 4 should be amended as follows:

"Policy 4: Planning for Economic Growth

To facilitate regeneration and ensure a sustainable economy, a total of ~~approximately 41,000~~ 51,000 – 76,000 square metres of land will be allocated for appropriate employment generating uses in Adur up to 2031 at the following locations:

- *Shoreham Airport (approximately ~~15,000~~ 25,000 sqm)*
- *New Monks Farm (approximately 10,000 - 35,000 sqm)*
- *Shoreham Harbour Regeneration Area (approximately 16,000 sqm within Adur)*

These allocations will provide a range of employment sites in terms of locations and sizes, and provision will be made within these allocations for a range of accommodation types..."

8.3 The wording of Policy 5 should be amended as follows:

- *~~Approximately~~ 10,000 – 35,000 sqm of appropriate employment generating floorspace..."*

8.4 The wording of Policy 7 should be amended as follows:

"Policy 7: Shoreham Airport

Approximately ~~15,000~~ 25,000 sqm of new employment generating floorspace (both aviation and non-aviation related), including a mix of B1 (business), B2 (general industry) and B8 (storage)/hangar uses, will be provided on the north-eastern side of the Airport..."

8.5 Map 2 should be replaced with the map attached at appendix 1 to this document.

8.6 Map 4 should be replaced with the map attached at appendix 2 to this document.