

Issue 4: Land at West Sompting (policy 6)**4.1 Are all of the requirements of policy 6 reasonable, justified, viable and deliverable?**

Our client controls land within the ownership of Sompting Estate, along with land owned by a private individual. There is an agreement between the two parties that the land can be developed in addition to agreement with our client. The agreement includes all of the area identified within the West Sompting allocation (Policy 6). Over the last four years our client has been working with Adur District Council (ADC) and relevant statutory consultees to inform the detail of the allocation and address the recognised constraints. Site assessment and master planning work have also informed this process.

We are now confident that the site meets all of the criteria in footnote 11, paragraph 47 of the NPPF, in terms of being 'deliverable' (i.e it is 'available now', 'viable' and 'suitable' for development). It is our client's intention to submit a planning application for the scheme in 2017, which will enable the first dwellings on site to be completed by the end of 2018. The total development is expected to take approximately 8 years with a delivery of between 50 and 100 dwellings per annum.

4.2 There is a reference in policy 6 to a 'landscaped buffer' along the western boundary. In policy 5 (New Monks Farm) the reference is to 'strategically sited areas of woodland to the north and east of the development area to provide a distinctive green edge, screening views of the new development'. Should there be a greater level of consistency between the two policies in this respect?

Our client recognises the importance of the Local Gap in maintaining separation between the built-up areas of Sompting and Worthing to the west. This was highlighted in the Council's Landscape Study 'Landscape and Ecological Survey of Key Sites Within Adur' (2012), Landscape Study Update (2015) and our client's own landscape assessment work. In response to this our concept master plan includes a defensible landscape edge along the site's western boundary. In the Local Plan allocation, this is also shown along the southern boundary, which we consider to be less sensitive in view of the larger separation between the relative built-up areas, however it is our client's intention to treat this in the same manner. As the specific function and nature of the 'landscaped buffer' appears different to that at New Monks Farm, where the study recommends the inclusion of 'strategically sited blocks of woodland' we would support the Council in their alternative wording.

4.3 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?

Our client has commissioned a site specific Flood Risk Assessment and Drainage Strategy. This confirms that the majority of the site is located within Flood Zone 1 (low probability of flooding). A small part of the site in its southeast corner is located within Flood Zones 2 and 3. In response to this constraint the areas of the site within Flood Zones 2 and 3 will not contain any built form.

A combined desktop and intrusive geotechnical survey has confirmed that parts of the site could support soakaways. The drainage strategy will therefore combine discharging to ground and the nearby watercourse via infiltration devices and/or attenuation measures in order to reduce runoff rates.

This approach accords with paragraphs 99 and 100 of the NPPF.

4.4 A number of concerns have been raised relating to the traffic impact of the proposed development. Can the Council satisfactorily demonstrate that the highway implications of the development have been (and will be) appropriately addressed?

A full Transport Assessment (TA) and Framework Travel Plan (FTP) will accompany the planning application, which will consider the three key transport tests set out in paragraph 32 of the National Planning Policy Framework (NPPF).

Existing concerns around highway capacity on the A27 are well documented and as such the applicant has held detailed discussions with both West Sussex County Council and Highways England to discuss the technical parameters of any TA, and to ensure that the TA is based on agreed parameters and is suitably robust.

The TA will build upon the Adur Local Plan Transport Study (September 2016 resubmission). The study identifies the highway impacts of the site allocations and explores opportunities to provide appropriate mitigation measures in addition to revising existing and potential future collision hotspots.

The study concludes that the levels of development promoted through the preferred strategy for the Adur Local Plan and the emerging Shoreham Harbour JAAP can be accommodated in terms of both capacity and safety, when appropriate mitigation is considered.

Furthermore, the applicant's TA will pay due cognisance to the numerous studies which have been undertaken on behalf of Highways England in respect to the A27 corridor.

The planning application will be supported by a comprehensive package of highways and transport measures which will ensure that safe access is provided for all users, that vehicular trip generation is minimised and opportunities for walking, cycling and public transport are maximised and that the residual impact arising from the development is suitably mitigated on both the local and strategic road network. These measures will be delivered by either Section 278 works and / or contributions secured through Section 106 agreement.

4.5 What assessment has been undertaken regarding the impact of the proposed development on existing infrastructure, for example schools, community facilities (including sports pitches), health services and utilities?

Our client has commissioned independent assessments of existing local infrastructure to understand the capacity for the new development. This work along with discussions with ADC and WSCC has informed the allocation requirements and the detailed wording of the policy. As a consequence Policy 6 makes specific provision for a new community facility, playing pitches and financial contributions towards education as part of the development. It also requires the applicant to make contributions via CIL/S106 or planning conditions as appropriate, and towards any other infrastructure necessary to make the development acceptable. The detail of such contributions will be discussed and agreed at the planning application stage.

This approach is believed to accord with the objective of the first bullet in paragraph 157 of the NPPF and meets the 'positively prepared' test in paragraph 182.

4.6 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)?

The Adur Local Plan Transport Study (September 2016 resubmission) sets out the mitigation required on the Strategic Road Network to deliver the quantum of development identified in the Local Plan. In respect to West Sompting, this includes

- A27 Sompting Bypass / Upper Brighton Road – Widen the southern Upper Brighton Road approach to accommodate additional demand joining the A27; and
- A27 Old Shoreham Road / A2025 Grinstead Lane – Convert existing roundabout to traffic signal controlled junction with localised widening on approaches.

These schemes have been costed by qualified quantity surveyors, with suitable optimism bias allowed for. The cost of the identified improvements is commensurate with the likely impacts arising from the developments identified and as such there is no indication that they would not come forward.

Locally, it has been identified that the following improvements should be made:

- Traffic calming on West Street;
- Localised junction improvements;
- Improvements to walking and cycling routes; and
- Improvements to and strengthening of bus services and bus infrastructure.

The measures identified will be delivered as either works through a Section 278 agreement or through developer contributions secured through Section 106 agreement. These contributions will either fully fund local schemes and / or partially fund more strategic improvements, such as those on the A27, where identified mitigation schemes provide mitigation for all development identified in the submission Local Plan as well as strategic benefits. This approach has been agreed with WSCC and Highways England and is consistent with that adopted elsewhere.

The accompanying Infrastructure Delivery Plan (IDP) sets out the infrastructure requirements of the Local Plan, how they will be delivered, by which agencies, and how they could be funded. In terms of highway and transportation infrastructure there are several well used mechanisms to delivery including Section 106 contributions, Section 278 works, CIL (when adopted) and other sources such as the Local Growth Fund and LEP.

4.7 Does the Council have a fall-back position if the development does not come forward as anticipated?

As stated in response to question 4.1 our client is confident that the West Sompting allocation can be delivered and has undertaken a considerable amount of work to provide further certainty on this point. However, if an issue were to arise that would potentially delay the delivery of the overall scheme, there is flexibility to develop the site in phases, with potential separation between the northern and southern parcels. See also response to 3.6 which considers a potential review mechanism of strategic sites.

Summary

Our client has worked positively with the local community, ADC and other statutory consultees during the preparation of the plan to demonstrate that the strategic allocation at West Sompting is deliverable and is presented within an appropriate policy context. These discussions have been supported by relevant technical work to provide ADC with the required comfort over the known constraints. We now consider

that Policy 6 meets the appropriate soundness tests and should be endorsed by the Inspector.