

ISSUE 2: PLANNING FOR ECONOMIC GROWTH (POLICY 4); PROTECTING AND ENHANCING EXISTING EMPLOYMENT SITES (POLICY 26); THE VISITOR ECONOMY (POLICY 27); AND RETAIL (POLICY 28)

- 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.**
- 2.1.1 Yes, the Council considers it has attached sufficient weight to building a strong and competitive economy. A strong competitive economy is one of the main aims of the Adur Local Plan and is directly reflected in both the Vision (V1, V2, V3, V4, V5) and the Objectives (O2, O3, O5) as well as a number of policies (2: Spatial Strategy, 4: Planning for Economic Growth, 5: New Monks Farm, 7: Shoreham Airport, 8: Shoreham Harbour Regeneration Area, 9: Lancing, 11: Shoreham-By-Sea, 12: Southwick and Fishersgate, 26: Protecting and Enhancing Existing Employment Sites and Premises, 27: The Visitor Economy, and 28: Retail, Town Centres and Local Parades). (The table on page 141 of the Submission Adur Local Plan identifies which policy delivers which elements of the Vision and Objectives of the Plan).
- 2.1.2 The Local Plan makes provision for 41,000sqm of employment generating floorspace to be provided at Shoreham Airport, New Monks Farms and Shoreham Harbour. While the Adur Employment Land Review (GL Hearn, 2014) (CD10/1) recommends the provision of 50,000-60,000sqm of employment floorspace based on Experian employment forecasts, this figure does not take into account capacity issues in the Local Plan area. Given the significant environmental constraints of the Local Plan area, 41,000sqm is considered to be an ambitious yet realistic and deliverable figure that demonstrates the importance of the economy in the Plan. While New Monks Farm Developments Ltd (REP-20-38-001) and Albemarle (REP-048-001), in their responses to the Inspector's question, have argued that the employment floorspace provision figures for New Monks Farm (approximately 10,000sqm) and Shoreham Airport (approximately 15,000sqm) should be minimum figures, this is not considered appropriate given the sensitive location of these two sites in the countryside and the Shoreham-Lancing Local Green Gap. (Please refer to Council's responses to issues 5 and 6).
- 2.1.3 The Local Plan seeks to protect and enhance existing successful employment sites such as Lancing Business Park, Dolphin Road Industrial Estate and Shoreham Airport, as well as protect and enhance Adur's town centres to ensure that they continue to meet local needs.

- 2.1.4 The Council's proactive approach to employment provision in the Local Plan area is set out in the Employment Topic Paper (2016) (CD07/13) submitted with the Local Plan.
- 2.1.5 The Local Plan has been aligned with the Strategic Economic Plan (2014) (CD10/2) which identifies the Shoreham area as one of the strategic locations for growth and specifically refers to the delivery of employment growth at Shoreham Harbour, Shoreham Airport and linked strategic housing allocations in the Local Plan. Local Enterprise Partnership (LEP) Local Growth Fund (LGF) money has been awarded for flood defence projects for Shoreham Harbour (£3.5 million) which will facilitate delivery of mixed use development including employment generating floorspace at this location, and more recently some additional LGF funding has been secured for a new roundabout on the A27 to help to deliver new development at New Monks Farm and Shoreham Airport.
- 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.**
- 2.2.1 While specific accommodation types for Shoreham Airport, New Monks Farm and Shoreham Harbour are not set out in Policy 4 of the Local Plan, appropriate employment uses are clarified in the site-specific policies for these areas. This is to ensure that the employment uses delivered are consistent with the needs of the district, and to discourage unsuitable uses that do not bring significant economic benefits or are incompatible with adjacent residential uses.
- 2.2.2 For example, Policy 7: Shoreham Airport allows for a mix of employment generating uses, both aviation and non-aviation related, including a mix of B1 (business), B2 (general industry) and B8 (storage)/hangar uses. The policy is therefore quite clear regarding the types of uses required but allows for a degree of flexibility in the type and amount of uses proposed. The Strategic Economic Plan (LRP, 2014) (CD10/2) identifies the Shoreham Airport allocation as an important employment growth centre for Creative, Digital and IT businesses and is also identified for Environmental Technology in the Greater Brighton City Deal.
- 2.2.3 With regard to employment uses, Policy 8: Shoreham Harbour Regeneration Area prioritises B1, B2 and B8 uses at Southwick Waterfront

and Fishersgate, and B1 uses within the Western Harbour Arm where residential is likely to be the primary use. Additionally, the policy also allows for small-scale ancillary retail, restaurants and cafes, leisure and tourism uses. The Shoreham Harbour Joint Area Action Plan Revised Draft for Consultation (CD13/14) contains more detail regarding appropriate employment uses.

2.2.4 Through working with developers, the wording of policies 7 and 8 should ensure that a satisfactory range of uses is achieved. This range of uses will inevitably lead to different types and sizes of employment units being provided.

2.2.5 Policy 5: New Monks Farm is less specific than policies 7 and 8 and refers solely to 'appropriate employment generating floorspace'. The reason for this, as explained in part 10 of the Employment Topic Paper (CD07/13), is that Adur is still not a recognised office location and does not have a significant office market and it would be unrealistic to assume that the majority of employment floorspace at New Monks Farm will be developed for B1 a/b uses. While the Adur Employment Land Review 2014 (CD10/1) also identifies a significant demand in the district for B8 uses, these are unlikely to be appropriate at New Monks Farm given the proposed adjacent residential uses and landscape sensitivity. Therefore, it was considered necessary for the policy to be flexible in this regard. This complies with para 21 of the NPPF which states that policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances.

2.3 Policy 4 (fourth sub-section) refers to the provision of additional employment floorspace from a number of sources. How will the Council ensure that this objective will be achieved?

2.3.1 As can be seen from the Council's Annual Monitoring Reports (e.g. CD21/1), a significant amount of new employment floorspace has consistently come forward within the main existing employment areas, particularly Lancing Business Park, Dolphin Road Industrial Estate, Shoreham Airport, and Shoreham Harbour. This includes extensions to, and redevelopment of existing premises. Over the last 5 years (2012-2016), a total of 26,143sqm of employment space has been provided at Shoreham Airport, Lancing Business Park, Dolphin Road Industrial Estate and Shoreham Harbour (outside of the western arm). There is no reason to suggest that employment floorspace will not continue to come forward in these areas.

2.3.2 The Council's Economic Development officers work proactively with businesses helping them to find new premises to expand. This includes the successful Higgidy Pies business which is redeveloping an adjacent employment site to accommodate the growth in their business at Dolphin Road Industrial Estate (planning application AWDM/1880/15). Additionally, Lancing Business Park is a successful Business Improvement District and like many of the employment areas in Adur, has low vacancy rates. Units are regularly being redeveloped and improved to ensure that they meet modern standards. The Council is therefore confident that these areas will continue to provide new employment floorspace.

2.4 Are all the elements of policy 26 (Protecting and Enhancing Existing Employment Sites and Premises) reasonable and justified?

2.4.1 Yes, all the elements of policy 26 are reasonable and justified. A detailed justification for this policy can be found at section 11 of the Employment Topic Paper (CD07/13) submitted with the Adur Local Plan which states:

'Whilst it is noted that new permitted rights introduced by the Government allow offices to be converted to residential uses, it is considered that there a number of key employment sites in the district which should be protected. Therefore, where planning permission is required, non B-class uses will not be permitted at the following sites:

1. *Lancing Business Park*
2. *Shoreham Airport*
3. *Dolphin Road Industrial Estate, Shoreham-By-Sea*

These three sites have been specifically selected for protection as they are the largest employment areas in Adur and are successful and well-functioning with low vacancy levels. They are particularly significant for Adur's economy and their loss would have a negative impact on the number and range of jobs within the district and would be likely to increase out-commuting. These three sites are also recognised in the ELR as being particularly important for Adur in that they are home to a number of successful businesses and have few vacant units.

All other employment sites/uses in the Local Plan area are also protected but the policy allows for some flexibility regarding change of use where it can be demonstrated that such a use is genuinely redundant. It is considered that this approach for Policy 26 complies with the NPPF which states that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.'

It should be noted that the three specific sites listed in the policy - Lancing Business Park, Shoreham Airport and Dolphin Road Industrial Estate are all recommended for protection in the Adur Employment Land Review (GL Hearn, 2014) (CD10/1) given their importance to Adur's economy.

2.5 Does the Plan do sufficient to encourage the regeneration and enhancement of the main town centres (NPPF paragraph 23)?

2.5.1 Part 3 of the Plan - Policies for Places - contains a number of place based policies including policies for Lancing (policy 9), Shoreham-By-Sea (policy 11) and Southwick & Fishersgate (policy 12). These policies have a number of functions including the regeneration and enhancement of the main town centres.

2.5.2 Policy 9: *Lancing* supports Lancing Vision which is a regeneration strategy, produced in 2012 by Lancing Parish Council, Adur District Council and BDP, that aspires to make the village a lively seaside destination through the encouragement of more activities and greater use of the village centre and seafront. The policy states that Lancing Vision will be a material consideration in guiding the future development of the village centre. In addition, the policy sets out primary and secondary frontages within Lancing centre and which uses will be appropriate within these frontages to ensure that it continues to be vital and viable.

2.5.3 Policy 11: *Shoreham-By-Sea* identifies a number of development sites for uses that will contribute to the vitality of the town and directs new retail floorspace to the Primary Shopping Area in line with the NPPF. A number of these sites were identified in the Shoreham Renaissance strategy (2006) (CD11/6) which aimed to regenerate the town centre area. There are development briefs for two of these sites - Pond Road and the Civic Centre. A One Public Estate bid is currently being progressed for the Pond Road site to help deliver community uses, including health centre and library, residential uses and a civic presence. An architect has been appointed for the Civic Centre site and demolition is due to commence in February 2017.

2.5.4 Policy 11 also directs new retail floorspace to the Primary Shopping Area in line with the NPPF, and sets out primary and secondary frontages within Shoreham town centre, specifying which uses will be appropriate within these frontages to ensure that the town centre continues to be vital and viable. The policy supports traffic management measures and environmental improvements to further enhance the town centre as well as opportunities to improve pedestrian/cycle access along the urban waterfront.

2.5.5 Policy 12: *Southwick and Fishersgate* sets out the primary frontage and states which uses will be appropriate within these frontages to ensure the long term health of the centre. The policy also supports environmental enhancements within the town centre. It should be noted that Southwick Square (Southwick Town Centre) is owned by Adur District Council which helps to ensure that only uses which ensure and enhance the vitality of the town centre are permitted.

2.5.6 In accordance with the NPPF, Policy 28: Retail, Town Centres and Local Parades aims to, as far as is practicable, direct town centre uses to town centre locations to ensure that town centres continue to thrive. Please see the response to Issue 2.7 below for more information on the evidence base for Policy 28.

2.6 How will policy 27 (the Visitor Economy) be delivered?

2.6.1 Policy 27 seeks to deliver V2, V7 and V11, and objective O6.

2.6.2 In line with the spatial strategy (Policy 2) the policy seeks to direct tourism facilities to within the Built Up Area, unless they are compliant with Policies 13: Adur's Countryside and Coast and Policy 14: Local Green Gaps.

2.6.3 This policy, and the plan as a whole, provides a mechanism to support and facilitate the delivery of a range of tourism opportunities and infrastructure. Examples of current projects/ proposals include the following:

- Phase 2 of development at Ropetackle North is anticipated to deliver a hotel (approximately 60 beds are envisaged by the site promoter); the Council is working with Hyde Housing to deliver this site.
- The Council is working with Natural England to deliver the English Coastal Path – which will improve public access to parts of the Shoreham Harbour Regeneration Area
- Adur District Council has already delivered a 'boardwalk' at Shoreham Beach to facilitate access to the shingle by those in wheelchairs/ using pushchairs, etc. The Council is seeking to extend this facility.
- A joint project is being implemented by ADC and WSCC to enhance the urban environment at Ferry Road, Shoreham Beach (Ferry Road, Lower Beach and Riverside car park; work commenced September 2016) an area popular with visitors, particularly in summer. This follows the successful delivery of the new Adur Ferry bridge.

centre. This paragraph of the policy therefore meets the requirements of para 23 of the NPPF which requires 'a clear definition of primary and secondary frontages in designated centres' and 'policies that make clear which uses will be permitted in such locations.'

2.7.4 The third paragraph of the policy refers to town centre uses outside of the defined town centre boundary and the need to undertake the sequential test and, where necessary, impact assessment. This requirement is in line with para 26 of the NPPF. The policy then goes on to set a local threshold of 1000sqm (net), above which an impact assessment will be required. This local threshold has been set to take account of the relatively small scale of the town centres in Adur and the potential effect that a large retail development outside of these centres could have on them. This threshold figure was recommended in the Specification for Retail Assessments in Adur (DTZ, 2012) (CD11/3).

2.7.5 The fourth paragraph refers to designated local shopping parades and the need to retain a predominant shopping use in order to ensure that they continue to meet local needs. However, the policy retains a degree of flexibility to allow for certain circumstances where retail is no longer a viable retail use in that unit, particularly where it has remained vacant for a long period (normally a minimum of one year). While local parades are not covered in the NPPF, they provide a valuable local service and it is therefore considered that it is the right approach for them to be addressed in the policy to ensure that they continue to provide this important service close to where people live and therefore reducing the need to travel.