

ISSUE 6: SHOREHAM AIRPORT (POLICY 7)

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

6.1.1 Yes, the Council considers that all requirements of policy 7 are reasonable, justified, viable and deliverable.

6.1.2 The first paragraph of the policy allocates 15,000sqm of employment generating floorspace (both aviation and non-aviation related) including a mix of B1 (business), B2 (general industry) and B8 (storage)/hangar uses, on the north-eastern side of the airport as indicated on the Policies Map (CD06/2). The Adur Employment Land Review (GL Hearn, 2014) (CD10/1) recommends that provision is made across the Local Plan area for 50,000-60,000sqm of employment floorspace. Although it is not possible to provide this level of floorspace in the Local Plan area given the area's environmental constraints, the Council has made every effort to provide as much employment floorspace as possible in the Local Plan area. The provision of 15,000sqm of employment floorspace at Shoreham Airport is justified as it provides a significant amount of new employment floorspace in an established and successful employment area.

6.1.3 Shoreham Airport is also included in the Coast to Capital Local Enterprise Partnership Strategic Economic Plan (CD10/2), the Local Strategic Statement 2 (CD03/1) and the Draft Adur Place Plan (CD24/9) as a key area for regeneration/economic growth.

6.1.4 Spatial Priority 1: Shoreham Harbour and Brighton Airport, Shoreham, of Local Strategic Statement 2 states:

'Local planning authorities will work with their partners to support the development of the strategic employment and housing sites, including Brighton Airport, Shoreham and Shoreham Harbour, identified in the Adur Local Plan by giving priority to the infrastructure improvements needed to enable the sites to be delivered...'

Brighton Airport, Shoreham: Priorities for securing new employment floorspace and job opportunities will include improved road access from the A27, which will also facilitate access to a new strategic mixed use site. Development potential should take into account the landscape setting and views of the Airport from the River Adur and the South Downs National Park, biodiversity and heritage assets of the area and the need to protect and preserve the green gap between Lancing and Shoreham. Taking account of the opportunities on the fringe of the urban areas to meet future

housing needs, the Green Gap between Lancing and Shoreham will be protected to preserve the character of Lancing and Shoreham and its role promoted as Strategic Green Infrastructure.'

- 6.1.5 This spatial priority clearly recognises the fact that Shoreham Airport is a very sensitive location in landscape terms and is located within the Shoreham-Lancing Local Green Gap. Any employment floorspace in excess of 15,000sqm is likely to have an unacceptable impact on the highly sensitive landscape and this is demonstrated in Part 2 of the Sustainability Appraisal (CD07/2) as well as the Sheils Flynn study 'Shoreham Airport proposed development masterplan - Broad overview of landscape and visual issues' (2013) (CD14/14). (See below for further discussion). The allocation at Shoreham Airport aims to strike a balance between the need for employment and regeneration in Adur and the need to protect its environment and character. This approach to development is consistent with the NPPF with respect to achieving sustainable development.
- 6.1.6 The Adur District Council Whole Plan & Community Infrastructure Levy Viability Assessment (NCS, 2016) (CD24/11) indicates that 15,000sqm of employment floorspace at Shoreham Airport is not viable based on the test assumptions. However, the Assessment goes on to state at para.7.10 that:
- 'this does not mean mean that this type of development is not deliverable. For consistency a full developer's profit allowance was included in all the commercial appraisals. In reality many employment developments are undertaken direct by the operators. If the development profit allowance is removed from the calculations, then employment development would be viable as well.'*
- 6.1.7 The first paragraph of Policy 7 also states that aviation uses should be required (consistent with the airport location) but in addition it also allows for non-aviation uses so as not to restrict development which may be of value to the wider economy as well as being compatible with an airport location. The policy states that a mix of uses is required including B1, B2 and B8/hangar uses. This reflects the Adur Employment Land Review (GL Hearn, 2014) (CD10/1) which identifies a specific need in the district for B1 and B8 uses based on Experian employment forecasts. However, the policy also allows for employment generating floorspace which does not fall within B1, B2 and B8 uses, so as not to be unduly restrictive and recognise that airport compatible non-B class uses may provide valuable employment and regeneration benefits. This is considered to be a flexible and proactive approach to facilitating economic development in this location.

- 6.1.8 The second paragraph seeks to ensure that new development at the airport minimises its impact on the sensitive landscape and retains key views. This is justified given that the airport is assessed as having a high overall landscape sensitivity in the Adur Landscape Sensitivity Assessment (2016, CD14/10). This is consistent with chapter 11 of the NPPF, specifically para 109 which states that the planning system should protect and enhance valued landscapes. Additionally, this part of the policy aims to reduce the impact of development on the historic assets of Shoreham Airport, in line with chapter 12 of the NPPF which aims to conserve and enhance the historic environment including Scheduled Monuments and Listed Buildings, both of which are present at the Airport.
- 6.1.9 The second paragraph of the policy also requires a development brief to be produced. Given the landscape and historic sensitivities of Shoreham Airport as set out above, as well as the fact that the allocation is located immediately adjacent to the Adur Estuary Site of Special Scientific Interest (which comprises saltmarsh and mudflats that afford a good feeding and roosting site for waders and wildlife), the need to set clear design parameters through a development brief is considered reasonable and justified. On this basis, it is also reasonable and justified that the policy requires, at the planning application stage, a desk based assessment and, where necessary, a field evaluation of archaeological assets, as well as a site wide landscape and ecological management plan to be drawn up and implemented, in order to ensure that development minimises its impacts on the landscape, the ecology of the adjacent SSSI and historic assets at the airport.
- 6.1.10 The policy also requires suitable access onto the A27 in agreement with Highways England. A joint access is proposed, in order to serve both New Monks Farm and the proposed allocation at Shoreham Airport. The Council's response to Issue 5 gives more detail regarding the proposed junction, and explains the additional Regulation 18 consultation exercise undertaken December 2015- January 2016 (See CD05/1) which included relocation of the junction as one of the issues addressed. As the Council's response to Issue 5 explains, a representation was received in response from Albermarle and Longbow (rep ID 48) seeking reference to a centrally located roundabout; however the recent response received on behalf of Albermarle (REP-048-001) does not refer to this matter and the Council is aware that the New Monks Farm site promoters are negotiating a collaborative agreement with the Airport. Paragraph 4.4 of the Albermarle response to the Inspector's Issues (REP-048-001) refers to the collaborative working to ensure delivery of the A27 access, in order to ensure that both developments come forward.

- 6.1.11 The fifth paragraph of the policy makes clear that because the airport site is currently designated as functional floodplain (flood zone 3b), that no development shall take place within the allocation until the Shoreham Adur Tidal walls on the west bank have been completed. The construction of the tidal walls will change the flood zone of the airport to 3a (high probability) which will potentially enable development (see the Adur Local Plan 2016 Sequential and Exception Test (CD06/10) for more information). Construction of the tidal walls has commenced and given that the Environment Agency currently anticipate that they will be constructed by Autumn 2018, it is not considered that this policy requirement will prevent development at the airport coming forward over the plan period. This aspect of the policy is also supported by paragraph 015 of the National Planning Policy Guidance which states that functional floodplain should be safeguarded from development.
- 6.1.12 The ninth paragraph of the policy refers to the existing developed area at the southern end of the airport and seeks to protect airside locations for aviation-related B1, B2 and B8 hangar uses. Given that it is a functioning airport, it is considered that a proliferation of non-aviation airside uses is likely to compromise the ability of the airport to operate in the long term due to lack of hangars allowing access for aircraft on to the airfield. However, a flexible approach has been taken and the policy also allows for non-aviation uses in non-airside locations to ensure that long term vacancies are kept to a minimum.
- 6.1.13 The ninth paragraph also supports appropriate aviation-related training uses. This is considered necessary to allow for uses such as pilot training and automotive engineering which benefit from being located at the airport. Such training uses also provide long-term benefits for the economy by helping to provide a better skilled workforce.
- 6.1.14 Albermarle's response (REP 048-001) and New Monks Farm Developments Ltd's response (20-38-001) to the Inspector's question state that the commercial viability of the development at Shoreham Airport depends on the support of Local Growth Fund funding and an extension of the strategic allocated site to provide 25,000sqm of employment floorspace to accommodate 'ground conditions and the need for a new access road'. Appendix 1 of Albermarle's representation is a plan showing a revised site boundary which extends southwards along the bank of the River Adur.
- 6.1.15 The Council objects to this proposed amendment to the boundary of the strategic allocated site on the grounds that it is contrary to Policies 13: Adur's Countryside and Coast and Policy 14: Local Green Gaps and is not consistent with the Council's evidence base.

- 6.1.16 The Assessment of Landscape Sensitivity for the Adur Local Plan Area (Sheils Flynn 2016) (CD14/10) and the Adur Landscape Study Update (CD14/9) highlight the exceptionally high sensitivity of the flat, open greenspace of Shoreham Airport and in particular the striking contrast between the green turf of the airfield and the sinuous natural form of the River Adur. The analysis of the Lancing-Shoreham Gap within the Adur Landscape Study Update shows:

'... the importance of the River Adur as a key landscape feature within the Lancing- Shoreham Gap. The majority of the publicly accessible viewpoints within the gap are from the bridges across or paths alongside the river and the sinuous river corridor provides a striking and distinctive focus for local views'(Page 12).

- 6.1.17 The Assessment of Landscape Sensitivity for the Adur Local Plan Area (Sheils Flynn 2016) (CD14/10) shows that the strategic site allocation at Shoreham Airport is within a local landscape character area (LSG Area 3) which is classified as high overall landscape sensitivity. It states:

'The views across the simple, expansive open landscape of the airport and the natural wetland habitats of the Adur corridor are considered to be highly vulnerable to change.'

- 6.1.18 The landscape sensitivity assessment also highlights the important contribution of the Shoreham Airport landscape character area to the landscape setting of the River Adur, Shoreham and Lancing:

'This LCA is an important component of the landscape setting of the River Adur and forms the foreground and to gateway views from the A27 and A27/A283 junction at the point where the river meets the South Downs. It is a significant part of the sequence of views and spaces on the northern edge of Shoreham and, at a gateway strategic scale, is a component of the wider landscape setting of Lancing.

The area also makes an important contribution to the landscape settings of St Nicolas, Shoreham, a Grade I listed building and the Shoreham Tollbridge, a Grade II listed building.*

The area is the foreground to views of the settlement (and Conservation Area) of Old Shoreham from the Shoreham Tollbridge (Viewpoint 14). These views are currently partially screened by the hedgerows alongside the River Adur and Downs Link path, but this vegetation will be removed when the new Adur Tidal Walls scheme is implemented, making this

landscape character area more visible and strengthening its role as part of the landscape setting of the River Adur, the settlement of Old Shoreham and the listed buildings of St Nicolas and the Shoreham Tollbridge.

- 6.1.19 The landscape sensitivity assessment includes analysis of sensitive views from the South Downs National Park and the River Adur paths. It demonstrates that the high visibility of Shoreham Airfield and in particular the section of the River Adur corridor that is adjacent to the airfield, in views from Lancing Ring (viewpoint 8), Lancing College Chapel (viewpoint 10), Mill Hill Nature Reserve (viewpoint 11), the River Adur embankment (viewpoint 12) and the Shoreham Tollbridge (viewpoint 13).
- 6.1.20 This is the most accessible part of the Lancing-Shoreham Gap. Public rights of way run along both banks of the River Adur, connecting Shoreham to the SDNP. The Old Shoreham Tollbridge (a historic bridge over the River Adur) remains an important pedestrian/ cycleway river crossing point. The path along the west bank of the River Adur is a public right of way; on the east bank a disused railway line is a national cycleway. Together, these popular routes form a circuit linking Shoreham Harbour, Shoreham, Shoreham Airport and the Ricardo Shoreham Technical Centre. The footpath along the west bank of the River Adur, will be diverted to follow the crest of the new flood defence embankment within the forthcoming Adur Tidal Walls Scheme.
- 6.1.21 Landscape studies undertaken by Sheils Flynn (Landscape and Ecological Surveys of Key Sites within the Adur District 2012) (CD14/2) tested the scope for development along the whole of the Adur riverside within Shoreham Airport and predicted that large scale development *would be visually intrusive and detrimental to a range of highly sensitive views*. However, the analysis in this report (see Figure 16f) demonstrated that carefully designed small-scale development could be accommodated in the north-east corner of the airport.
- 6.1.22 recognising the economic importance of new commercial development at Shoreham Airport, Adur District Council has used this initial study and further, more detailed analysis of potential landscape and visual issues to inform the location and scale of the strategic site allocation at Shoreham Airport. Key evidence on the landscape and visual issues that are relevant to the strategic site allocation, including analysis of the key viewpoints 13 and 14, is summarised in a recent draft report by Sheils Flynn, *Shoreham Airport – Design guidance for development*, 2016 which is provided in Appendix 1. Annotations on the analysis for Viewpoint 13 explain that there is considered to be:

Some scope for development tucked into this corner of the gap, provided it is screened by new planting, because this area is screened by existing vegetation (which could be supplemented by some new planting, while still maintaining the overall openness of the airport greenspace).

- 6.1.23 However, as referred to above, the scope for development is considered to be limited because of the exceptionally high landscape and visual sensitivity of the riverside zone. The issues are summarised on Figure 8 in the *Shoreham Airport – Design guidance for development* report in Appendix 1. The final section of the report provides design guidance for development which *has been developed to minimise the potential adverse impacts to the landscape settings, views and heritage assets that have been identified as important and valued characteristics of this part of the Lancing-Shoreham Local Green Gap.* The first of the design principles listed specifically addresses the importance of confining the strategic allocation at Shoreham Airport within its current, carefully sited location:

‘Conserve the open, undeveloped character of the Shoreham Airport - River Adur west river bank between the allocated site and the railway crossing. The analysis of views in the landscape sensitivity assessment demonstrates that this part of the Lancing -Shoreham Local Green Gap is prominent in sensitive views from the SDNP and is also a defining and highly distinctive component of the landscape setting of the River Adur and of the towns of both Lancing and Shoreham.’ (Box 3, page 17).

- 6.1.24 The Council believes that, in terms of landscape impact, an increase in the proposed allocation is unjustified, as set out above. It should also be noted that no detailed evidence has recently been submitted to demonstrate that the proposed allocation of 15,000sqm is unviable, or how an increase to 25,000sqm overcomes these viability problems. It is noted that the Adur District Council Whole Plan & Community Infrastructure Levy Viability Assessment (NCS, 2016) (CD24/11) indicates that 15,000sqm of employment floorspace at Shoreham Airport is not viable based on the test assumptions. However, the Assessment goes on to state at para.7.10 that:

‘this does not mean that this type of development is not deliverable. For consistency a full developer’s profit allowance was included in all the commercial appraisals. In reality many employment developments are undertaken direct by the operators. If the development profit allowance is removed from the calculations, then employment development would be viable as well.’

- 6.1.25 The Albermarle and New Monks Farm Developments Ltd responses state that the additional floorspace could be accommodated without

unacceptable landscape or other impacts, but the Council disagrees for the reasons set out above; neither has any detailed evidence in relation to landscape matters been submitted by the site promoters.

6.1.26 The Council welcomes the fact that the owners of New Monks Farm and the Airport are working together to ensure delivery of these two important strategic sites. It is the Council's understanding that New Monks Farm are willing to provide the internal access road from the new junction on the A27 to the proposed allocation; as such, this will reduce the financial impact on the Airport itself.

6.1.27 In addition, contributions will be sought from development at Shoreham Airport to mitigate impacts on road junctions as identified in the Adur Local Plan Second Addendum Revised Reissue (Sept 2016) (CD12/4), as well as towards a package of site specific travel behaviour initiatives, public transport improvements and improved cycle and pedestrian links - please see Adur Infrastructure Delivery Plan October 2016 (CD07/19) for full details.

6.2 When will the Development Brief be required (second paragraph)?

6.2.1 The Development Brief will be required shortly after the Local Plan is adopted and it is envisaged that it will be produced early Summer 2017. Work has commenced on this document - see the draft *Shoreham Airport: Design guidance for development* (2016), which is provided in Appendix 1 - and in addition to addressing landscape, heritage and biodiversity issues, it will also address the appropriate mix of employment uses for the allocation.

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?

6.3.1 The Council will work with Natural England, the Environment Agency and the Sussex Wildlife Trust to ascertain the most appropriate forms of mitigation on site to retain ecological value on and adjacent the site, given its proximity to the Adur Estuary SSSI. However, mitigation is likely to focus on the following:

- An effective drainage strategy to reduce polluting run-off into the River Adur;
- Green roofs to minimise landscape impacts while ensuring ecological benefits;

- Appropriate landscaping/green infrastructure links around and through the development to provide ecological and landscape benefits
- Protection or translocation of species i.e. newts, as necessary or appropriate

6.3.2 It is noted that CPRE response (REP-021-001) refers to the lack of detail in the Submission Adur Local Plan (CD) regarding protection of or mitigation of the development site. The detail of any mitigation is most appropriately considered at the detailed design/planning application stage. However, the development brief required by the policy will also address potential mitigation measures. Indeed, the Sussex Wildlife Trust (SWT) response (REP-025-001) states that it would be restrictive to include specific mitigation measures for the site in the Local Plan as the situation will evolve with time. In addition, the SWT support the policy's wording which requires ecological enhancement to be incorporated into the development, as they consider this supports the ethos of the NPPF paragraph 118.

6.3.3 The response by DMH Stallard (REP-048-01) indicates that initial survey work by the owners indicates that the site has no ecological constraints. However, the Council do not agree with this conclusion as the site is located adjacent to the Adur Estuary SSSI, and the Preliminary Ecological Appraisal of Shoreham Airport (The Ecology Consultancy, 2012) (CD14/6) states that *'the site assumes its greatest ecological value by providing a secondary and supporting role to the adjacent Adur Estuary SSSI. This is because it functions as a buffer along the western edge of the SSSI and is likely to provide a supporting role in terms of providing extended foraging and roosting habitat for wading birds associated with the SSSI such as lapwing.'* Therefore any new development at the airport needs to take account of the supporting role of this area and any potential impact on the SSSI.

6.3.4 None of the potential mitigation measures are likely to have significant implications in terms of viability and delivery, and no evidence has been submitted to demonstrate that there will be any adverse viability impacts arising from these mitigations.

6.4 Should there be a definition of workplace travel plans in the glossary?

6.4.1 The Council acknowledges that, despite Policy 7 referring to 'workplace travel plans' (fourth paragraph) no definition has been provided in the Adur

Local Plan's Glossary. In addition, no definition of travel plans (in general) has been provided either.

- 6.4.2 Should a modification be proposed to remedy this situation it is proposed that the following definitions are used:

Travel Plan:

'A Travel Plan is a long-term management strategy for an organisation or site that establishes a structured strategy with clear objectives, supported by suitable policies, which ensures that sustainable transport objectives are delivered through action.'

Workplace Travel Plans:

'A workplace Travel Plan is a living document involving the identification of an appropriate package of 'stick' and 'carrot' measures aimed at promoting sustainable travel, with an emphasis on reducing reliance on single occupancy car journeys for commuting and business travel.'

(This wording has been provided by West Sussex County Council, the Highway Authority for Adur District).

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

- 6.5.1 Given the environmental constraints in the Local Plan area, there are no alternative sites on which a similar amount of employment development (15,000sqm) could be provided without having an impact on the amount of housing delivered over the Plan period.

- 6.5.2 It is possible that a greater emphasis could be placed on employment generating uses at some of the other strategic sites i.e. New Monks Farm and Shoreham Harbour. However, as stated above, this is likely to result in a reduced amount of housing being delivered in the Local Plan area. Alternatively, additional sources of funding (eg Local Growth Fund) could be sought to help implement infrastructure and improve viability.

- 6.5.3 Nevertheless, the Council considers the approach taken in Policy 7 of the Submission Adur Local Plan to be justified.