



Ben Daines <ben.daines@adur-worthing.gov.uk>

Re: 1207 Steyning Road, Shoreham - Re: Landscape report: Shoreham Gateway

1 message

William D Thornton <willdthornton@gmail.com>

21 February 2017 at 18:05

To: Ben Daines <Ben.Daines@adur-worthing.gov.uk>

Cc: Robert Thornton <robert@thornton-design.com>, Moira Hayes <moira.hayes@adur-worthing.gov.uk>, James Appleton <James.Appleton@adur-worthing.gov.uk>

Dear Ben,

I have responded to the precise points made in your email of 12th Feb 2016 below in red. In truth, however, we feel there are so many inaccuracies and exaggerations within this report that frankly make it completely unreliable as a component of your evidence base. I have attached our response to your responses re Issue 3's questions from the inspector, together with direct responses to the updated version of the Sheils Flynn Study given under the comments tab of the report. I believe these were sent to James Appleton and copied to the Programme Officer earlier.

Fundamentally, though I believe the basis for the report's methodology is entirely unsound. On page 7 the report states: "The assessment of overall landscape sensitivity for the Adur Local Plan area has been updated to take account of the proposed development allocations." This is predicated on the adoption of the Submission Plan's proposed land allocations and how they might impact on our site's contribution to the integrity of the gap, whereas all the sites at assessment should be considered equally, as proposals, until such time as the plan is adopted.

In conclusion the report offers no scope for mitigation of our site - none! And yet the same authors have offered numerous 'design principles' that could help mitigate the impacts of development of 600 houses and 35,000sqm of retail space at NMF and 15,000sqm of employment space at Shoreham Airport - both much larger more visible and more constrained sites. It is completely unreasonable to suggest that similar design principles cannot be used to mitigate similar impacts on our far smaller and far less constrained site.

I don't suppose we will be able to reach agreement on much of the detail of this report, however, the following points do require clarification.

1. The exact height of the ATW embankment along the river
2. The change/impact the current approved ATW will have as it crosses our site. Particularly on the much overhyped 'open' aspect of 'the riverside pastures' etc.
3. Whether or not any vegetation will be lost and if so exactly where/how much.
5. Update generally in light of our application and its realignment of the ATW across the site
6. Viewpoints - some of these we completely disagree with a) their conclusions b) their inclusion/relevance
7. Escalation of the overall landscape sensitivity from medium-low to medium-high
- 8 Methodology - unsound
9. Mitigation
10. Inclusion within the green gap? The inspector appeared to suggest this site, among others, should not be included.

I look forward to your response. Please contact me if you require any further clarification. And we would be happy to make ourselves available for a meeting should you think it appropriate.

Kind regards,

Will.

Will Thornton
Cobbetts Developments Ltdwilldthornton@gmail.comm +44 (0) 7989525310
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On 12 Feb 2016, at 17:34, Ben Daines <Ben.Daines@adur-worthing.gov.uk> wrote:

Dear Robert and Will,

I refer to your emails of 1st and 4th February regarding the Shoreham Gateway Landscape Report. It was intended that the report issued to you was the final report but it has since been amended to take account of some of the concerns you raised in your email. I shall go through each bullet point in Robert's email individually.

First bullet point - The report referred to the embankment being 4m high but I agree that there was one reference that seemed to suggest the pathway was being raised by 4m. This wasn't intentional but needed to be amended. I have had another look at the tidal wall plans and discussed them with Keely Mowatt from the EA and adjacent to your property she confirmed that the new pathway would be 5m AOD and that this would be 1m - 1.5m higher than the existing level. **This is still inaccurate. Adjacent to our site the embankment will be raised by around 600mm.** The report has been amended accordingly to make this clearer.

Second and third bullet point - The sensitivity of this site has been reassessed taking account of some additional considerations. One of the purposes of updating the landscape work was to understand the importance of sites in relation to the local green gap, namely their importance in preventing coalescence **The inspector has given you a clear indication that he believes this site (among others) should not be included as part of the gap** as well as their contribution to the setting of settlements as this was an issue that the previous studies did not address. This has led to a reclassification of the sensitivity of your site given that it is considered as being particularly important to the setting of Shoreham. Additionally, the raised embankments on either side of the river and the potential loss of vegetation adjacent to the site (see below) will also make the site more visible. **The report regularly comments about the loss of vegetation along the embankment. It is correct that vegetation will be lost from the top of the embankment, however, vegetation mainly grows up from the bottom of the embankment where it will not be disturbed and only removed where the embankment crosses the site (as evidenced by the recent removal of vegetation to access the river bank from our site). This was confirmed to us at a meeting with the EA and their contractors on Tuesday 31st January. Where vegetation is removed the planning permission clearly shows a planting scheme to replace this. Much is also made of the increased visibility due to the raising of the embankment. Whilst this may improve visibility into the site from immediately adjacent along the river side embankment, the higher embankment will also help to further screen the site from more distant views not enhance them.** This is explained in the Shoreham Gateway Landscape report.

Fourth bullet point - Having confirmed this point with Keely Mowatt, she is still of the view that the majority of vegetation adjacent to the site is likely to be removed to construct the embankment and has sent me an email to that effect. The study has been amended however so it refers to the reinstatement of vegetation and states that the majority (rather than all) of the vegetation will be removed. **As above, you really ought to speak with the contractors at Beach Green. This is simply not the case.**

Fifth bullet point - This image is incorrect and has been amended. **Viewpoint 2, in the report, claims that buildings on our site would 'likely screen views to St Nicholas church'. Roof heights would be no higher than those of the existing two storey pitched roofed houses (Nos 1 & 3 Steyning Rd) in the foreground of the church, which clearly show the church tower and nave will still be visible.**

Sixth bullet point - The author of the report considered, as a result of the assessment, that the proposed development would have a negative impact on the setting of Shoreham and the river environment and the report is written accordingly. **No objection has been raised by Natural England in response to our planning application regarding the site's proximity to the river environment. They comment on our application as follows: "This application is in close proximity to Adur Estuary Site of Special Scientific Interest (SSSI). However, given the nature and scale of this proposal, Natural England is satisfied that there is not likely to be an adverse effect on this site as a result of the proposal being carried out in strict accordance with the details of the application as submitted. We therefore advise your authority that this SSSI does not represent a constraint in determining this application."** I would also state that previous reports were quite clear about the impacts of development at Shoreham Airport and the allocation was relocated and significantly reduced as a result. **This is still an allocation of 15,000sqm and associated car parking which is going to have far greater impact on the river corridor than our much smaller site. This has been acknowledged by all the reports which describe the site as highly visible and virtually impossible to mitigate for because of the considerable impacts.**

With regard to Will's email, the development proposal assessed by the study was previously submitted by yourselves and included in the Allen Scott Landscape Assessment. This was the available scheme at the time that the Sheils Flynn report was commissioned. I understand that this scheme has been revised to 35 dwellings. **This report need to be further updated to reflect the current planning application.**

Views of the site from the A27 have been referred to as they are a valid consideration. **This cropped image is extremely (and no doubt deliberately) misleading. Passers by on this busy and fast arterial road**

are considered to have low sensitivity as receptors. Passengers travelling on the southern carriageway nearest to the site are heading in a westerly direction and therefore would have to be looking over their shoulder to glimpse this view. Those travelling east would have to be looking over the entire width of both carriageways and above the arm cove barriers. We therefore strongly object to the continued use of this image/viewpoint. It should have been discounted and was not referenced as a viewpoint for consideration by our Landscape and Visual impact consultants. However, the study also looks at the impact of the proposed development on views from a number of other locations that are accessible on foot and from the train. See more detailed comments in attached report.

This report, together with the other landscape reports, form just one element of the evidence base of the emerging Adur Local Plan. Yet you consistently chose to ignore the first and most comprehensive study used to identify suitable land within the district, The Urban Fringe Study 2006, which concluded our site could be considered further. The Study stated: "the sites identified in this report are believed to be the better alternatives to development elsewhere in the gap". This included our site

I therefore attach an amended landscape report. However I would point out that none of the amendments made have changed the overall conclusions of this report. The other reports (including the Landscape Study Update and the new Assessment of Landscape Sensitivity) will be published on the Councils' website shortly.

Regards,

Ben Daines | Senior Planning Officer | Adur & Worthing Councils
01273 263065 | <http://www.adur-worthing.gov.uk/planning-policy/>

On 1 February 2016 at 17:04, Robert Thornton <robert@thornton-design.com> wrote:

Dear Moira,

Thank you for the issue of your Landscape Report, in respect of our site. We note that it is not named as a draft and have serious concerns about its current status given that it is riddled with factual inaccuracies, contradictions and misleading summary statements. Therefore, we respectfully request that this report is taken out of public circulation, until we can come back to you in more detail. However, please note the following:-

- The report states that the embankment to the river is to be raised by 4m, as part of the EA's Tidal Wall Scheme, when it is being raised by 400mm.
- The report re-assesses the Landscape Character Sensitivity as 'Medium', when the same author's Landscape & Ecology Report 2012 stated that it was 'Medium/Low', previously.
- The report re-assesses the Visual Sensitivity as 'Medium/High', when the same author's Landscape & Ecology Report 2012 stated that it was 'Medium/Low', previously.
- The report states that the screening vegetation, to our site, on the existing east river embankment will be removed by the EA's Tidal Wall works, when the authors have no authoritative knowledge that this will be the case, while we have minutes, from one of many meetings with the EA, in which the EA stated that they had redesigned their raised embankment proposal,) so as not to affect the existing vegetation, except where the embankment necessarily crosses our site.
- The report contains a very misleading image from the west bank of the river, just north of the toll bridge, which suggests that our residential proposal extends across the west face of St Nicholas' Church and over the top of all or part of three properties to the south of our site, which we do not own, when clear views of the Church will be maintained.
- The report's summary is laced with negative language and suggests that there is no way of visually mitigating the impact of development on our site, whilst the same authors wrote in glowing terms how 30,000sq m of employment development in the airfield could be mitigated with green roofs, etc.

These are just a few of the matters we have identified. A fuller response will be forwarded, in due course, However, as you know, we are meeting the Coastal West Sussex Design Review Panel tomorrow and we very much hope that they have not been briefed on the basis of such a flawed report, as we were hoping to get some constructive feedback. In the meantime, we believe it would be sensible if you change its status to 'draft' at the very least, until it can be amended.

Regards,

Robert ThorntonThornton **architecture + design**T: 01798 368623 M: 07773 245612 W: www.thornton-design.com

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From: [Moir Hayes](#)**Sent:** Monday, February 01, 2016 9:15 AM**To:** [William David Thornton](#)**Cc:** [Robert Thornton](#) ; [James Appleton](#) ; [Ben Daines](#)**Subject:** Landscape report: Shoreham Gateway

Dear William,

Please find attached a copy of the final landscape report on Shoreham Gateway site. Please note that the other reports that it refers to (Landscape Study Update and Landscape Sensitivity) are currently being finalised.

Regards,

Moir

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Moir Hayes | Principal Planner | Planning Policy Team | Adur & Worthing Councils
01273 263247

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<Shoreham Gateway - Sheils Flynn Jan 2016 rev2 (2).pdf>

2 attachments**Shoreham Gateway - Sheils Flynn Jan 2016 rev2 (2) with comments.pdf**

2924K

**Cobbetts Developments Ltd Concerns with LA Responses to Issue 3.pdf**

774K