

Adur Floodwatch Group

Run by the community for the community

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Homework Questions Day 3, Issue 1 New Monks Farm, Policy No 5

Dear Mr Banks,

Here are our further comments in respect of the above responses to the Inspector by Adur DC.

Ref ALP/025/P

The Council is to produce a paper for New Monks Farm on options for the built up area boundary.

At the hearing the inspector commented that he had never examined a local plan's site allocation where the built out boundary was not clearly defined. He requested the authority respond with options which clearly demonstrated the built out boundary of the New Monks Farm allocation. In response, the authority has responded with three options with their preference for option 1.

Option 1 is the original format submitted for plan examination.

This still fails to answer the Inspector's concern in respect that the indicative boundary gives no conclusive built out boundary line for the New Monks Farm allocation. Surely, this submitted 'indicative' proposal was the very reason why the inspector queried the line of the built out boundary in the first instance?

Point 1

Based upon the original 10,000 sq m of commercial space, it is obvious that there is a question over the viability of the development, hence the site agent's pre examination comments pushing for the larger commercial area.

Without the increased business area it is clear that the development is not deliverable financially.

Using terminology such as 'a minimum of 10,000 sq m' for the commercial area questions the viability of the allocation. Is the site really financially justified using option 1 if, for any reason. just the minimum 10,000sqm commercial development was to be finally implemented?

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(As required by NPPF Para 173, 'a development should provide competitive returns to a willing owner and developer to enable the development to be deliverable'.)

Point 2

We feel that Option 1 is far too non-specific and, in respect of any allocation, absolute and quantified information only should be used with a clear indication of the projected built out boundary with its development constituents. Particularly, as, in this case, where such issues as viability, coalescence, landscaping, setting, drainage and infrastructure are sensitive issues to ensure sustainability/deliverability. Air pollution is also a concern in respect of local road infrastructure. As we discovered in the session on this, there is a paucity of up-to-date monitoring and knowledge by the authority of levels for Nitrogen Dioxide and carbon particulates which is the Authority's legal obligation to manage.

Flexibility to the level which could be applied at the planning application stage using option 1 is inappropriate.

If Option 1 with its indicative built out boundary is permitted, with the revised wording of 'a minimum of 10,000 sq m' , this will allow major changes, not apparent for the last consultation, to be made to this allocation at the planning stage without any further public consultation to cover all the aspects mentioned in the previous paragraph.

We feel this is totally unacceptable.

Point 3

It is known publically that the senior members of the Authority clearly are fully supportive of the site promoter's proposal for a greatly increased business area for an international major retailer on the site. This support has been strongly commented upon by the leader of the council in local printed and broadcasting media. From a planning application standpoint, disconcertingly, it feels that the decision to approve may already be corporately decided if the allocation receives Plan approval.

What is the real intention of the Authority? We are certain it is to achieve the development as shown in the site promoter's Masterplan. Surely, this means that option 2 should be their preferred choice for the Inspector to make his decision on the site.

If New Monks Farm is approved for Plan inclusion under Option 2, with the substantially increased built out boundary because of the potential 35,000 sq m of commercial area, this should entail **a further 6 week public consultation period** for public and stakeholders' comment on all resulting impacts of infrastructure, traffic and air pollution and particularly environmental and drainage issues.

Point 4

Bearing in mind the Council's response on the Green Gaps policy (ALP/025/E) to include the country park proposed in the New Monks Farm development within Policy 14, we agree the 'country park' should be included

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However, based upon the site promoter's layout, the proposed relocated Withy Patch site, if ultimately positioned south east of the proposed roundabout, with the increased commercial area and housing 'overspill' into the country park these would all collectively impact on coalescence and the landscape views from the National Park and from the south. Their impact would reduce the acknowledged critically narrow Gap (council's words from Landscape study ALP/025/E) to reduce it even further towards coalescence of the Lancing and Shoreham communities.

All these elements should be part of a further consultation and not left to application approval.

If the NMF allocation does not proceed, we feel the boundary for the green gap should revert to the urban built out boundary to the east and Policy 14 revised accordingly.

In summary, we find that Option 1 is unacceptable. The level of potential change which could result should be subject to the Planning Inspector's decision regarding plan acceptability and instructions. The Authority should be submitting a far more quantified preference which clearly demonstrates the built out line.

If this allocation receives Inspector's approval, these major potential changes must not be 'fudged' through at the planning application stage under Option 1 without a proper community & stakeholders' consultation.

Kindest Regards,



Bill Freeman
Chair

PS

AFG confirms again its concerns that this site allocation is inappropriate for flood risk reasons as commented upon both in written consultations and verbal presentations at the hearing.

With this background of concern, realistically we feel that none of the proposed 3 options put forward by the LPA are truly acceptable, particularly with the published SWMP which fails to cover a site specific FRA to fully justify allocation inclusion as required by the exception test pt 2.