

# Campaign to Protect Rural England Sussex Branch CIO, Brownings Farm, Blackboys, East Sussex TN22 5HG.

## Adur Local Plan Examination 2017

### CPRE Sussex Response to the Inspector's Homework, Emailed 18<sup>th</sup> April 2017

#### WEEK 1

##### Day 1 (31.01.17).

###### Issue 1 (ALP/025/A).

CPRE Sussex does not consider an early review helpful or necessary. The constraining geography of Adur is unlikely to change, as is the area realistically available for development and included in the Adur Local Plan (hereafter ALP), beyond windfall sites. We would expect Adur DC to regularly review the progress of the ALP against negotiated targets and publish the results through the AMR.

Adur's current housing requirements and shortfall in relation to the OAN will be most appropriately addressed through the Greater Brighton and Coastal West Sussex Strategic Housing Market Area as confirmed by GL Hearn's February report '**Defining the HMA and FEMA**'.

In relation to the HMA, we refer to GL Hearn's 2012 report: '*Within the Sussex Coast Housing Market Area (SCHMA) it seems highly unlikely that identified development needs can realistically be met over the period to 2031. This reflects the geography of the area.....The potential for extensions beyond current urban boundaries in Brighton and Hove, Adur and Worthing is restricted by key development constraints including flooding and the National Park*' (page 247, para 11.7). The report further suggests that across the SCHMA there will be a 45% shortfall in the housing provided over the Plan period to 2031 occasioned by limitations of geography. (Para 11.12).

###### Issue 2 (ALP/025/B)

CPRE Sussex accepts and agrees that environmental constraints will limit the availability of privately owned sites for further employment opportunities, however it may be possible for local authority owned industrial sites to be redeveloped to offer extra capacity.

###### Issue 3 (ALP/025/C)

From GL Hearn's 2017 report and the work of the Strategic Planning Board there seems confusion by key local authorities as to how the HMA operates in relation to their boundaries. Will the extension of the Greater Brighton Strategic Planning area and its extension to include West Sussex be appropriate or adequate for planning purposes? We accept that Hearn's determination of the relevant local authority boundaries provides an adequate frame for the local HMA.

**The Historical Atlas of Sussex** demonstrates that Sussex moved from a predominately agricultural economy in the C18th to, by the early C20th, an economy dominated by seaside tourism. This was "*One of the first coastal regions in the world to be transformed by tourism from an agrarian economy with a rural settlement pattern dominated by small market towns to a service sector economy dependent on tourism*" (page 92).

*"By 1914 the town councils along the coast were substantially composed of townspeople who viewed the surrounding countryside as land on which to build houses, golf courses and as a source of water and other supplies to their towns. Facilities were sought not only for tourists but also for the growing number of retired residents attracted by the leisure facilities and ambience.....tourism had sowed the seeds for a conflict between town and country within Sussex"* (page 93).

While the value of countryside became better appreciated in contrast to the worst excesses of the British 'Industrial Revolution' in the C18th, it has only been more recently that this value is supported by research such as presented in '**The Health and Social Benefits of Nature and Biodiversity Protection**', 2016, page 5, from the Institute of European Environmental Policy (IEEP). *"Benefits can be gained when making active use of nature.....from the physical presence of nature in the near surroundings.....the distance from and amount of green space plays an important role in how large the health benefits are... benefits include faster recovery from mental fatigue, less stress, better quality of life and lower risk of mortality"*. (Mallet et al 2005). Similarly the Department of Environment, Food and Rural Affairs in '**Biodiversity 2020: A strategy for England's wildlife and ecosystem services**' (2011, page 9) states that: *"The natural world, its biodiversity and its constituent ecosystems are critically important to our wellbeing and economic prosperity, but are critically undervalued in conventional economic analyses and decision making."*

CPRE Sussex encourages every piece of wilderness and open space to be regarded as having precious value in and for itself; its biodiversity and ecological contribution being frequently overlooked. While it is difficult to quantify the trade-off between the value of health and wellbeing from open spaces against the profitability they offer from housing and commercial developments, this should neither mean such value is ignored or only seen in 'protected' landscapes.

Clearly the current settlement in Adur is the result largely of this heritage even into the current century and as British coastal holidaying has reduced, the not-in-work and retired populations have increased. As in the C20th the local rail and road connections help shape a predominantly coastal HMA. It must be clear that broader regional planning will have limited local value if it appears to have little relevance to Adur or relationships with it has with Worthing and Brighton and Hove (B&H).

#### Issue 4 (ALP/025/D)

CPRE Sussex notes the response of the WSCC drainage engineer (RD) in relation to the New Salts Farm FRA and the high risk of surface water flooding. This coincides with the experience of local residents, backing on to the site who have previously experienced water runoff incursions from this site. We consider this area as inappropriate for housing and a suitable site for long term omission.

#### Issue 5 (ALP/025/E)

CPRE Sussex supports the Council's policy on omission sites in recognising that there is huge pressure on Shoreham's little open space for development. Already there is coalescence in the east where B&H meets Adur, the current proposals for New Monks Farm (NMF) extend the northern tentacles of Lancing eastwards in a ribbon development. The precious setting of Adur and its much reduced floodplain against the setting of the South Downs National Park, needs protection and augmentation. We would prefer that a stronger Green Gap policy was developed by Adur.

#### Issue 6 (ALP/025F)

We do not consider the change from a 'total' to a 'minimum' terminology acceptable, without an adequate definition of boundaries, an open ended opportunity for developers becomes available. It is unacceptable for local authority planning officers to offer open ended plans which will be difficult for the community to hold to account and which play to the financial interests of developers. We would expect that a clear indication of the amount of new homes or employment space to be built would be stated, with a maximum, with definitive boundaries, as determined by the evidence base. We therefore find that a minimum of 15,000sqm at Shoreham Airport, 10,000sqm at NMF and a minimum of 16,000sqm at Shoreham Harbour Regeneration Area to be wholly inappropriate. The purpose of the plan-led system is to provide clarity for applicants and decision-takers so that applications that accord with the development plan can be approved without delay (NPPF, paragraph 14). What would happen if an applicant proposed a development of 50,000sqm at Shoreham Airport? This meets the 'minimum' requirement but would not be supported by the evidence base as permissible.

While we would prefer no increases in the areas designated for economic development we object to this lack of a new maximum on sensitive sites. The future of Adur and Sussex open spaces, whether greenfield or brownfield, should not be left to the desires and interests of developers.

We further object to the economic purposes suggested for these developments at NMF and the airport. From the available information, the employment property purposes do not meet the CLG's Strategic advice '*to encourage economic growth through the expansion of clusters or networks of knowledge driven creative or high tech industries and support economic regeneration*' (CLG, 2012, para 21).

The B1,B2, B8 provision for the airport site fails to support such objectives. Furthermore the site itself close to Ricardo's and the historic and protected Toll Bridge is inappropriate and unnecessary. The airport has inlet property potentially developable on the airport among the terminal buildings, it has open car parks and there are open spaces adjacent to the railway line that would avoid development creep on the airfield. Further encroachment into the Ricardo's/Toll Bridge area included in the fluid plans for NMF and the Traveller Site and roundabout will amount to almost continuous development from Lancing along the A27 up to the flyover but diverting beneath it to the historic river crossing. Development also encroaches on the site of the recent fatal air crash. The latter site, whether or not 'memorialised' should surely be retained as a commemorative open space.

Issue 7 (ALP/025/G)

No comment.

Issue 8 (ALP/025/H)

No comment.

## **Day 2 (01.02.17)**

Issue 1 (ALP/025/I)

We feel sure that following clarification about the Adur Tidal Wall scheme, and the various associated issues, Mr Thornton will agree with the Council that his suggested development proposals for the Steyning Road site would be wholly inappropriate and that this site should continue to be omitted from the Plan.

Issue 2 (ALP/025/J)

The 2012 GL Hearn report states that "*the population aged in their 20s and early 30s has declined not just in proportion but in absolute terms....there is significant in-migration of older age groups.*" (para 11.22). By 2031 the greater part of Adur's population and the largest areas of growth will be in the population aged over 60 and 75 years. While longevity increases and medical treatments improve, significantly increasing proportions of Adur's population are likely to experience mobility and debilitating medical conditions that may require significant support. In 2012 Hearn's analysis suggests a 68% growth in dementia and a 58% increase in mobility problems in the older population (para 11.62). Consequently, there will be every need both to improve access to affordable 'step down' and specialist care and housing facilities, there will be a greater need to secure new housing developments that are readily adaptable to meet the needs of frailer older people. As well as enhancing community support and access, new homes will need to be readily adaptable to support changing washing, toileting and mobility requirements.

The current ALP seems to evidence minimal relevance to this older population and the likely age profiles of inward migrants to Adur. Retail and services and particularly the care and health rather than the digital economies would seem the more likely job providers by 2031.

The response of James Stephenson, on behalf of the HBF, to the requirement to build new homes to the suggested Part M4(3) standard ignores local privileging commercial convenience and undermining planning with a 'localist' agenda. Adur Council needs to be more forceful with developers in relation to real local needs over the Plan period.

Issue 3 (ALP/025/K)

CPRE Sussex is concerned that any diminution of national space standards should be avoided, particularly since the issue of office conversions does not currently figure in the Plan. We are unclear why this issue was raised as part of the examination by the HBF. Adur Council has previously drawn attention to its shortage of office space, and therefore would do well to consider some form of Article 4 Direction to prevent office to residential conversions.

#### Issue 4 (ALP/025/L)

As previously discussed we would wish to see a total number of homes designated in the Plan at Sompting if the number is to exceed the initial 480. Given that Sompting is finalising its Neighbourhood Plan, this would be fair and reasonable for the parish and the local community.

#### Issue 5 (ALP/025/M)

We support the revised wording.

#### Issue 6 (ALP/025/N)

#### Issue 7 (ALP/025/O)

We support the Council's stance towards looking for affordable housing on sites with less than 10 dwellings. Because development sites becoming available in Adur are likely to be small and developed by local builders, this will potentially enable affordable houses to be spread out across Adur rather than set in obvious enclaves. GL Hearn's 2012 report re-enforces, the commonly held local view that the key local need is for affordable homes and otherwise discounted or subsidised accommodation whether for sale or rent. Hearn suggests that *'If all households (in the coastal area) were to be provided with an affordable home, 2,134 affordable properties would need to be delivered each year for the next five years. This is unrealistic given the current funding models. However local authorities should work to stimulate the supply of affordable housing as far as possible'* (para 11.32). With the paucity of land for development in Adur, it is the smaller sites that turn up.

### **Day 3 (02.02.17)**

#### New Monks Farm

#### Issue 1 (ALP/025P)

In relation to the three options set out by the Council in response to the Inspector's queries, CPRE Sussex considers neither options 1 nor 3 acceptable. Option 2 will also necessitate further public consultation; particularly as leaders of Adur District And Worthing District Councils and West Sussex County Council, met in March 2017 to sign a commitment to the IKEA leveraged scheme at NMF.

We lament the lack of active participation by the wider Adur communities in the examination of the ALP, given the huge consequences for such development over the next fifteen years; the likely impact on quality of life, of increased and potentially dangerous air pollution, the impact on public transport and road congestion for local people and for future residents has received little attention.

We do not consider it in the interests of local people that the built up boundary should only be disclosed at planning stage. It must surely be inappropriate for the 28ha country park to be included in the built up area as this can potentially prejudice its future use and leave it as a possible development site.

We do not assess the development of New Monks Farm (NMF) as likely to be either financially viable or sustainable without the commercial additions, particularly the major retail outlet which we understand the Council has been courting for at least six years. We are concerned that the wholly inappropriate site to the northeast of the airport appears to be included only to obviate some of the financial costs related to water management and the new roundabout.

All options reveal a lack of concern for the countryside and the assumption that it exists merely as a resource to be plundered for commercial interests and sees the country park as straightforward mitigation.

A clear BUAB that omits the country park would at least force some clarification of plans for this significant site before the planning stage.

CPRE Sussex suggests that it is inappropriate for the Council to use the development of the Brighton and Hove Albion football training ground to extend the Built Up Area boundary when this area was previously regarded as open space and important to the Green Gap and issues of coalescence. The previous lack of implementation of the golf course and country park plans led to the remaining area's use as a dump for various earth and building spoil. The redetermination and creep of built up area boundaries now threatens the very limited open space adjacent to the A27 in Lancing. Surely land owners should not be gaining from such dereliction.

Issue 2 (ALP/025/Q)

We support as large a country park as possible, hopefully more than 28ha.

Issue 3 (ALP/025/R)

The issue of the long term maintenance and management of the drainage and water network across the NMF site will be of major concern to both those using the developments and the wider community in Shoreham and Lancing. It would be appropriate to see a separate company set up by the developers, with an injection of sufficient forward funding to be able to assure residents and users to meet any future breakdowns and overflows. Further clarification as to how this will be arranged needs to be revealed before the NMF site is taken further.

Issue 4 (ALP/025/S)

Up to date ecological information should always be the rule, especially as there is already considerable evidence of interesting biodiversity on this precious wildlife site.

Issue 5 (ALP/025/T)

We welcome the progress to a more careful emphasis on ecological issues exemplified by a greater consistency in approach.

## **Airport**

Issue 6 (ALP/025/U)

Having reviewed the available plans for the Ropetackle 2 development we consider that the waterside housing and cafe development will have their view of the open airfield compromised by the suggested building development in the northeast corner. Furthermore, while we have not been able to calculate sight lines from other new housing on Ropetackle, from the height of the proposed new tourist hotel (of at least six storeys), we calculate that the views of the airfield will also be significantly adversely affected by the building(s) currently proposed at the northeast airport site. Not only would this building(s) be visible from a variety of well used local walks along the riverbank and the historic Toll Bridge, but it sets out a new isolated area of development on the airfield very separate from the Terminal main building line.

Issue 7 (ALP/025/V)

While we consider the siting of the airfield development in the northeast corner wholly inappropriate and better sited to the south, we recognise that should the development proceed, the viability of the airport as a functioning airport could be undermined if there is insufficient space for aircraft to taxi safely. This could eventually lead to the airfield's change of use. For this reason, further advice needs to be sought from the CAA, to make sure that this or any new airfield development within the Plan does not undermine the airfield's ability to function as an effective airport.

We accept that BURB and other boundary delineation should be substantiated as in Policy 7, but we seek assurances that the impact of the NMF development on flying from the airfield is reported on.

Issue 8 (ALP/025/W)

As previously stated, we wish to see a new maximum development allocation set for both the airfield and West Sompting.

Issue 9 (ALP/025/X)

We welcome attention being given to ensuring that the delicate and precious elements of the airfield and its environs is properly addressed. The care shown by the ecologists working on Tidal Walls Scheme at the airfield, has been instructive.

Issue 10 (ALP/025/Y)

No comment.

## **WEEK 2**

### **Day 4 (07.02.17)**

Issue 1 (ALP/025/Z)

As the White Paper is out for comment, and many organisations including the HBF and the CPRE will contribute, it seems most appropriate only to consider its 'direction of travel' since the eventual legislation may substantially change from its White Paper draft.

Issue 2 (ALP/025/AA)

We have already commented on the unsuitability of this site, we fail to see how, from any perspective, its development can be other than a likely blot on a landscape dominated by a Saxon church and an C18th wooden bridge, both 'listed'. This area, properly 'Old Shoreham' (hence the 'Old Shoreham Road') was the original town centre until the silting up of the river here undermined the opportunities for shipping from here. Later it was the main river crossing until the Beeding bridge up river. Clearly the Visual Impact Assessment needs to be appropriate to the plans.

We would not expect any planning application for this site to be made or heard until the soundness of the Adur Plan has been adjudicated.

### **Day 5 (08.02.17)**

Issue 1 (ALP/025/BB)

No comment.

Issue 2 (ALP/025/CC)

We support the addition of this reference to water run-off from the Downs.

Issue 3 (ALP/025/DD)

We would be interested to learn the EA's view.

Issue 4 (ALP/025/EE)

No comment.

Issue 5 (ALP/025/FF)

As stated previously, CPRE Sussex on the hydrological evidence from independent experts, doubt that acceptable flood mitigation and drainage schemes can be installed affordably on the New Salts Farm site.

## References:

1. Historical Atlas of Sussex, Kim Leslie and Brian Short eds, Phillimore, Chichester, 1999.
2. Coastal West Sussex Strategic Market Assessment Update, final report, GL Hearn, November 2012

3. Defining the HMA and FEMA: Greater Brighton and Coastal West Sussex Strategic Planning Board, GL Hearn, February 2017.
4. The Health and Social Benefits of Nature and Biodiversity Protection, Institute of Environmental Policy, 2016.
5. Biodiversity 2020: A strategy for England's wildlife and ecosystem, Department of Environment, Food and Rural Affairs, 2011.

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