

Adur Local Plan Examination

Response to ALP025E

- 1.1 This note is a response to ALP025E relating to Day 1 Issue 5 and the Council's approach to the Green Gaps policy in the Adur Local Plan. It is written on behalf of Hyde New Homes who have an interest in the omission site known as New Salts Farm. This note should be read in conjunction with our Reps, Hearing Statements and having regard to our comments raised at the Hearing Sessions.

Maintaining the Green Gap

- 1.2 ALP025E seeks to further justify the Councils approach to the Green Gaps policy. For reasons previously expressed in our Reps, Hearing Statements and at the Hearing Sessions our view is that Adur have no clear, objective or justified evidence to demonstrate that the approach taken, and scale and size of the Local Green Gap identified in the ALP, are appropriate given the significant housing need in the District.
- 1.3 We agree with the views the Inspector expressed at the Hearing Sessions that the land which should be incorporated within the Green Gaps is only that which achieves the objectives set out in para 3.45 of the Local Plan.
- 1.4 We submit (as has been set out in our Reps) that the omission site New Salts Farm can be developed whilst still achieving the objectives of the Green Gap as set out in the Local Plan
- 1.5 As we have expressed previously, the 'evidence' which underpins the Councils approach to the Green Gap and Countryside has been inconsistently applied and has not appropriately identified or quantified what is necessary in physical terms to achieve the objectives of the Green Gap. The Green Gap has only been 'tested' following the proposed allocation of New Monks Farm and West Sompting and suggests that there is a risk that allocation of additional sites could cause coalescence without actually testing these options.
- 1.6 No further consideration has been given to the impacts that additional site allocations may have on the Green Gap and Countryside designations or the ability to retain an appropriate Green Gap and the setting and character of the settlements within Adur.
- 1.7 The explanation provided in ALP025E does not provide any new or additional evidence which we consider to change that view.

The Councils Proposed Amendments

- 1.8 ALP025E proposes amendments to the Local Green Gap boundary and to the policy wording for Policies 13 and 14 which seek to address the doubts raised by the Inspector at the Hearing Sessions.
- 1.9 For reasons set out below, we are of the view that the amendments proposed are not based on clear, objective or justified evidence to demonstrate that the approach taken to the Green Gap and Countryside allocations are appropriate, or that the scale and size of the Local Green Gap is appropriate and necessary given the significant housing need in the District.

1.10 In respect of the New Salts Farm site the proposed amendments would retain the majority of the site within the proposed Local Green Gap and Countryside allocations removing part of the site to the west from the Gap but maintaining this as Countryside.

1.11 For reasons set out in our Reps, Hearing Statements and at the Hearing Sessions, we are of the view that New Salts Farm could be allocated for residential development and the Local Green Gap and setting and character of Lancing and Shoreham would still be maintained. Further that principles of landscaping and mitigation across the site could be adequately addressed through policy wording, as with other sites proposed to be allocated in the Local Plan.

1.12 Below we respond to the Council’s explanation for the amended approach to New Salts Farm:

Council Comment	Response
<p>As the landscape character assessment for the Lancing-Shoreham Gap (CD14/10) shows, the New Salts Farm site (as submitted by Hyde Homes) falls into two landscape character areas: the Hasler Fringe (LSG LCA 7) landscape character area to the east and the New Salts Farm (LSG LCA 6) landscape character area to the west.</p>	<p>As a point of clarity LSG LCA 7 is in fact to the west of the New Salts Farm Site and LSG LCA6 is to the east.</p>
<p>Both LCAs make an important contribution to the distinctive landscape character of the gap and the settings of Lancing and Shoreham-by-Sea. For instance, the natural, irregular patterns of waterways, mature trees, woodland and scrub in the Hasler Fringe LCA and the framed views northwards to the Downs are distinctive landscape characteristics which contribute to the landscape setting of Lancing generally and the Hasler estate in particular.</p>	<p>The reference to features largely relate to the land known as Old Salts Farm and not the east of LCA 7 which falls within Hyde New Homes ownership and the omission site known as ‘New Salts Farm’</p> <p>p.32 of CD14/10 also states under contribution to landscape setting of Lancing that <i>‘this well treed character contributes to the distinctive landscape setting of Lancing’</i></p> <p>The part of New Salts Farm which sits within this LCA is not well treed and is therefore not a part of the landscape which contributes to the distinctive setting of Lancing.</p> <p>Further those trees and ditch features which are on the New Salts Farm part of the LCA are capable of being retained, integrated and enhanced as part of any development of the site. Development would also offer the opportunity to improve the urban edge and enhance the landscape setting of Lancing.</p>
<p>However, the Council acknowledges that the Hasler Fringe LCA does not specifically prevent coalescence of the settlements of Lancing and Shoreham-by-Sea and so can be excluded from the Local Green Gap designation (Policy 14).</p>	<p>We welcome that the council have accepted that the part of New Salts Farm which falls within the Hasler Fringe LCA does not prevent coalescence of settlements and its removal from the Green Gap Policy. However as above, we maintain that there is potential to deliver new development on this part of the New Salts Farm site whilst retaining and potentially improving the existing landscape edge and landscape setting to Lancing.</p>
<p>By contrast, the open fields on either side of New</p>	<p>The objectives of the green gap are to avoid</p>

<p>Salts Farm Road (within the New Salts Farm LCA) provide a strategically important open greenspace which maintain a sense of separation between the buildings of Shoreham Airport and Shoreham Beach and at a larger scale, between the settlements of Lancing and Shoreham-by-Sea.'</p>	<p>coalescence of the settlements of Adur. In this case Lancing and Shoreham. The development of the New Salts Farm site would (as explained in previous Repts) retain a large part of the Green Gap between Lancing and Shoreham (east of new salts farm road) which would continue to meet the objectives of the Green Gap and would prevent coalescence of the settlements.</p> <p>Reference to maintaining a separation between the buildings of Shoreham Airport and Shoreham Beach are not objectives of the green gap which is to avoid coalescence between the settlements of Adur. Further, as set out in our Repts, there is opportunity in any development of the site to provide a green landscape buffer which would provide an improved urban edge and maintain a sense of separation between these buildings.</p>
<p>Views across this area also make a strong contribution to the sense of 'openness' and 'greenness' in the Lancing-Shoreham Gap, particularly in southwards views from Lancing ring, in which the gap appears to extend almost to the sea, and in northward views from the A259, in which the gap is the foreground to views to the downs'</p>	<p>What this does not consider is that the sensitive development of this part of New Salts Farm would still maintain a large gap to the east, which meets the objectives of the Green Gap, and retains in part the openness and greenness of the above mentioned views across the site itself with sensitive site layout and retention of a landscape buffer.</p>
<p>The views across these fields, from the train and from the A259, also form part of the gateway western approach to Shoreham-by-Sea. This is the only part of the Lancing-Shoreham Gap where there are direct views across open fields from the A259, which runs along the southern fringes of the area</p>	<p>This comment is incorrect and does not take account of the fact that the full area to the east of New Salts Farm Road provides views across open fields from the A259.</p>
<p>The historic terminal building of Shoreham Airport are local landmarks in these views</p>	<p>This has no impact on the contribution that the site might make to the objectives of the green gap.</p>
<p>It should be noted that the existing built development along New Salts Farm Road and at Shoreham Airport, which is currently isolated within the open landscape of the gap, ensures that the New Salts Farm LCA is particularly sensitive to coalescence. This is because there is a risk that development extending across the open fields between Lancing/Shoreham Beach and the New Salts Farm and/or Shoreham Airport buildings will cause these existing groups of buildings to be perceived as the new settlement edge in local views across the gap from the train and from the A259 and in the longer southward views from the Downs. The whole of the New Salts Farm LCA, which includes the open fields on either side of New Salts Farm Road, is therefore included within the Policy areas designated for Policy 13 (Countryside and Coast) and Policy 14 (Local Green Gap) because</p>	<p>This appears to be focussing on preventing coalescence between Shoreham Airport, New Salts Farm Road and Shoreham Beach, not the objective of the green gap which is to prevent coalescence between settlements in Adur (Lancing and Shoreham).</p> <p>This does not consider the positive impact that a new settlement edge to Lancing could deliver given the identified poor urban edge which currently exists.</p> <p>There is reference to 'a risk' that development will cause buildings to be perceived as a new settlement edge – this demonstrates that the evidence is ambiguous. The Council have not considered the actual impact of the development of this site on the ability for the Gap to continue to</p>

<p>this area is considered to contribute to the distinctive landscape settings of Lancing and Shoreham-by-Sea and to be essential to prevent coalescence between these two settlements.</p>	<p>meet its objectives.</p> <p>It appears to be suggesting that a new settlement edge could be formed, which suggests that the settlements would not coalesce if a new edge is formed.</p> <p>For reasons explained previously and evidenced in our Reps we remain of the view that the area to the east of New Salts Farm road would retain an appropriate green gap which would prevent coalescence and meet the objectives of the Green Gap. Further that the sensitive redevelopment of the New Salts Farm site would be capable of mitigating and improving, through landscaping, the appearance of the settlement edge, and by ensuring development is focussed to the west of the site would retain a green space between the airport buildings, those on New Salts Farm Road and Shoreham Beach and the new development at New Salts Farm.</p>
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- 1.13 In addition to those comments above we would add a more general point relating to the inconsistency in the Councils approach to assessing their evidence base.
- 1.14 As noted above, in respect of New Salts Farm, the proposed new Green Gap boundary line has been proposed to follow the boundary of character areas LSG LCA 7 and LSG LCA 6. As set out in previous Reps these are broad brush character areas and do not take account of key differences in character of landscape within them. Nevertheless the council have sought to use these broad brush character areas to define a new approach to the Green Gap.
- 1.15 The approach however to the Steyning Road site, which falls within part of LSG LCA 4 and covers a wider area also to the west of the river Adur, has been to consider the specific contribution that this site makes to the landscape setting of Shoreham, and has concluded that this part of the character area can be removed from the Green Gap.
- 1.16 This further demonstrates the Council's inconsistent approach to the assessment of individual sites and highlights that there is no clear evidence base to justify their proposed approach to the Green Gap and Countryside policies. The Local Plan cannot therefore be found sound.

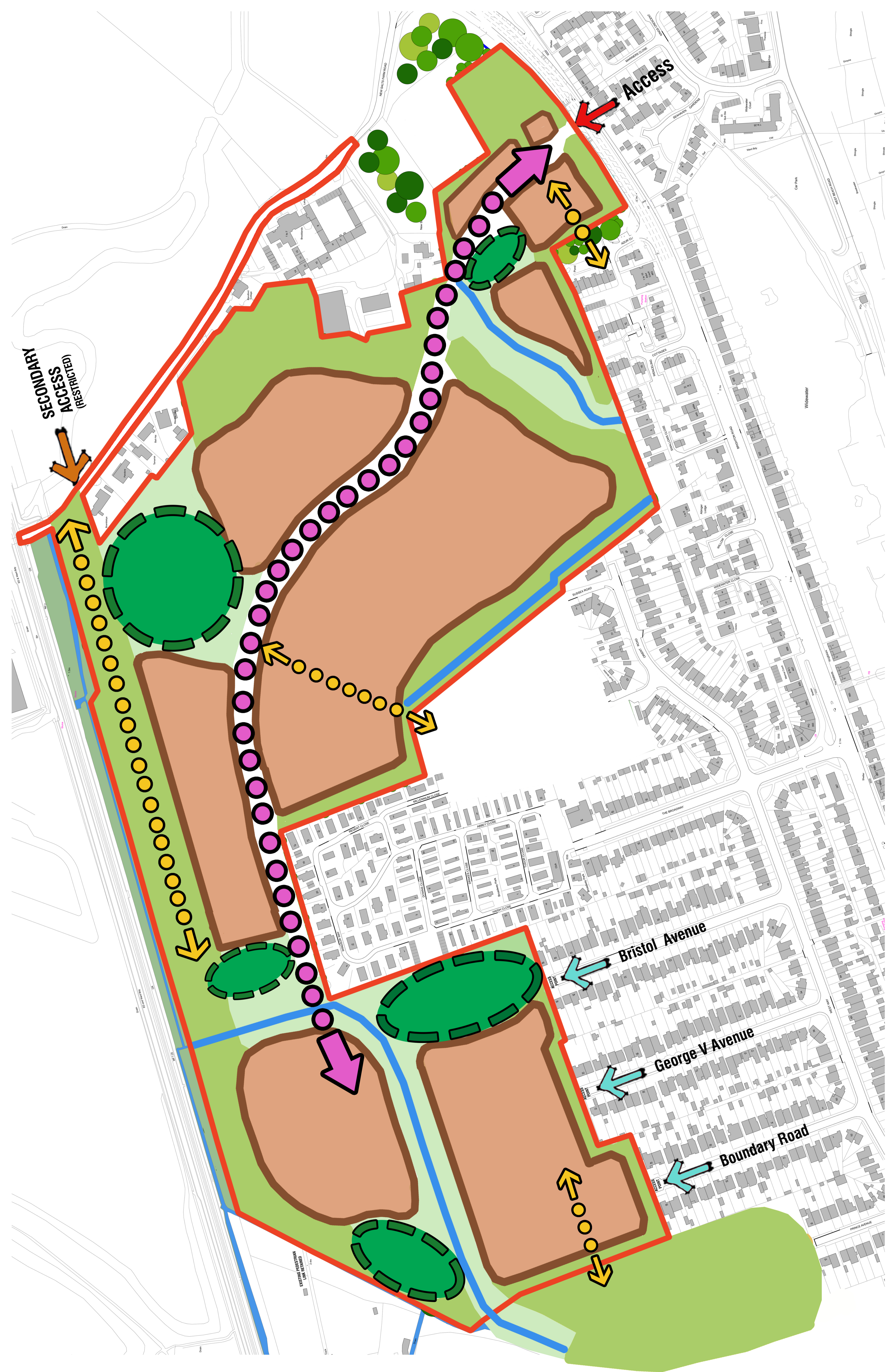
Conclusion

- 1.17 We remain of the view that no evidence has been provided by the Council to justify its current or proposed approach to the Green Gap or Countryside policies. Further that there are additional sites, currently within the Green Gap and/or Countryside which are capable of being allocated for residential development whilst maintaining an appropriate Green Gap and continuing to protect the setting and character of the settlements
- 1.18 This should be considered in the context that Adur is required to make every effort to meet the housing needs of its area, and should positively seek opportunities to meet development needs based on co-operation with other authorities and private sector organisations. In this instance,

where Adur are falling so far short of meeting their OAN in the Proposed Local Plan, they should be looking for every opportunity to contribute towards meeting their OAN.

- 1.19 We maintain that the council has not achieved the correct balance between meeting housing needs and protecting settlements.
- 1.20 We consider that New Salts Farm is capable of allocation for residential development. As demonstrated in draft masterplan submitted with our Reps (copied here at **Appendix 1**) we are of the view that the proposed development would not result in coalescence between Lancing and Shoreham and would maintain an appropriate Local Green Gap (as demonstrated in our Reps). Further that the setting and character of Lancing and Shoreham would be preserved and with potential to improve the settlement edge and landscape setting of Lancing specifically through an improved landscape edge
- 1.21 Nevertheless, to respond to comments and feedback received from Adur and their consultants to date, we have prepared a revised masterplan (**Appendix 2**) which demonstrates how the site could be developed whilst maintaining a larger landscape buffer to the east of the site. This specifically responds to the concerns about the relationship of the development to the railway line and buildings on New Salts Farm Road and would enable the site to continue to deliver around 300 new homes to contribute towards meeting housing need in Adur. (We would stress that this is one option as to how the development of the site could be laid out to demonstrate how the proposals can respond to the Council's identified constraints. It should not be considered the only or final option for development layout which would be determined through preparation of a planning application and more detailed pre-application discussions with the Council after the site has been allocated).
- 1.22 The Adur Local Plan as currently drafted, and the proposed amendments to the Green Gap and Countryside policy wording, cannot be found sound as given the above it is contrary to the NPPF specifically paras 14, 17, 47, 152, 156 and 157.

Appendix One – Illustrative Masterplan Reg 19 Reps



SECONDARY ACCESS (RESTRICTED)

ACCESS

Bristol Avenue

George V Avenue

Boundary Road

EXISTING RESTRICTION LINE REMAINED

Appendix Two – Revised Illustrative Masterplan



NO.	REVISIONS
9	23.08.16 Phase 1 updated. Air corridor lines removed.
8	23.08.16 Air corridor added. Site Layout amended to avoid the air corridor.

NOTES:
FOR COMMENT

 The Hyde Group Making a lasting difference	Scale: 1/1000 Date: FEBRUARY 2016	Drawn by: CR Checked by: GS	Drawing No: 15.003_010	Client: NEW SALTS FARM PROPOSED MASTERPLAN	 HGP ARCHITECTS 15, 01239 225 225 F: 01239 237 034 E: EMAIL@HGP-ARCHITECTS.CO.UK W: WWW.HGP-ARCHITECTS.CO.UK
	Project: NEW SALTS FARM, WIDENWATER ROAD FAREHAM, HAMPSHIRE, PO16 7JH			Revision: E	Date: 23.08.16