



ADUR DISTRICT  
COUNCIL

## Submission Adur Local Plan Main Modifications Representation Form

Return Address: [adurplanningpolicy@adur-worthing.gov.uk](mailto:adurplanningpolicy@adur-worthing.gov.uk)

Or:

Planning Policy Team, Adur and Worthing Councils, Town Hall, Chapel Road, Worthing, BN11 1BR

Or hand in at:

- Shoreham Centre, 2 Pond Road, Shoreham-by-Sea, BN43 5WU or
- Portland House, 44 Richmond Road, Worthing, BN11 1HS


Please return to Adur District Council by midnight 26th July 2017.

Late representations will not be considered.

**Please note that at this stage, representations are only being sought on whether the Main Modifications to the Plan are sound and/or legally compliant.**  
**Please do not repeat your previous comments as these have already been considered by the Inspector.**

Comments received on the proposed Main Modifications within the time period will be considered by the Planning Inspector as part of the examination of the Adur Local Plan.

Comments may also be made on this form in relation to the Addendum to the Sustainability Appraisal of the Adur Local Plan.

 Use of your information: Respondent details and representations will be forwarded to the Inspector for consideration. All documents will be held by Adur District Council and representations will be published including on the internet e.g. [www.adur-worthing.gov.uk](http://www.adur-worthing.gov.uk). Personal contact details (address, email and phone number) will be removed from published copies of representations. Your information will be handled in accordance with Data Protection Act 1998.

Contact details will be added to the Adur Planning Policy consultees database to keep you informed on the progress of the Adur Local Plan and other related documents.

Please tick if you do **not** want to be informed.

This form has two parts:

- i. Part A - Respondent Details. You only need to fill this in once.
- ii. Part B - Your representation(s). Please fill in a separate sheet for each representation you make.

It is recommended that you read the Guidance Notes provided for an explanation of terms used in this form

**Part A – Personal Information**  
You only need to complete this section once

**Personal Details**

First name **Mark**

Last name **Milling**

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(where applicable)

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Post Code **BN15 ORW**

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**Agent's Details** (if applicable)

First name **Marie**

Last name **Nagy**

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## Part B – Representation

Please use separate sheets for each Main Modification you wish to comment on.

1. Which Main Modification to the Adur Local Plan does this representation relate to?

**Amendments relating to:**

Main Modification no: **MM4 and MM5 – Policy 4 – Planning and Economic Growth**

or  
Sustainability Appraisal  
(Please state which part):

**Please go to Q6 to comment on the Sustainability Appraisal**

2. Do you consider the Main Modification(s) to be: (tick as appropriate)

2.1 Legally Compliant Yes  No

2.2 Sound Yes  No

**Please read the Guidance Note for guidance on legal compliance and soundness.**

**If you have ticked no to 2.1, please continue to Q4.**

**If you have ticked no to 2.2, please continue to Q3.**

**If you have ticked yes to 2.1 and 2.2 please go to Q7.**

3. Do you consider the Main Modification(s) to the Adur Local Plan to be unsound because it is not: (tick as appropriate)

3.1 Positively Prepared

3.2 Justified

3.3 Effective

3.4 Consistent with National Policy

4. **If you consider the Main Modification(s) to the Adur Local Plan to be unsound or not legally compliant, please explain why in the box below:**

**Background**

The floorspace requirements referenced in Policy 4 are derived from the Adur Employment Land Review 2014.

Para 2.40 to 2.42 of the Submission Local Plan summarise that the required floorspace is for **additional Class B1 to B8 employment uses**.

Para 2.45 acknowledges that it is very unlikely that the full requirement will be provided within Adur, due to **limited capacity** arising from a number of **environmental constraints**. As such Adur will need to **rely on neighbouring authorities to meet its needs**.

In spite of these requirements and constraints, Para 2.43 states that other employment generating uses such as retail, leisure and service industries also make a significant contribution to the economy.

This flexible definition of employment generating uses is confirmed in the Glossary of the Submission Local Plan as “... *B1, B2 and B8 uses, public and community uses and main town centre uses (but excludes housing development)*” and this also follows the definition in the NPPG for Economic Development Uses.

Para 2.43 goes on to specify that these **Non Class B Uses** will be focused in town centres and other **locations within the Built Up Area Boundary**.

The proposed Built Up Area Boundary goes on to **include the New Monks Farm site**, with its employment space defined only as being required to be **‘appropriate’**.

This background assessment and definition of employment space remains unchanged by the Main Modifications.

The required **amount of floorspace** only is proposed to be defined now as a **minimum rather than an approximate requirement**.

**Objection**

Adur District has acknowledged that it has an objectively assessed requirement for an amount of Class B floorspace which is unlikely to be met within the District. It is therefore appropriate for Policy 4 to be amended to refer to a minimum rather than to an approximate amount of new employment space, subject to the proposed development that does come forward being appropriate in environmental terms.

This will help to ensure the allocation sites will be developed in the most efficient, effective and environmentally acceptable way to help meet the District’s requirements and to minimise its reliance on neighbouring authorities.

The Policy as drafted does allow flexibility in the type of employment uses that may be appropriate on the allocation sites, which does accord with national guidance. However, in view of the assessments that have been undertaken and the constraints within the District, the acceptance of other employment uses should not be at the expense of Class B uses, especially at the outset of the new Local Plan period.

The inclusion of the New Monks Farm site within the Built Up Development Boundary and inclusion of wording in Policy 4 and its supporting text to allow for a range of employment uses on this site outside of use Class B1 to B8 could especially mean that other uses will come forward and that the Site will not contribute at all or in any meaningful way towards meeting the need for additional Class B uses. **This would serve only to exacerbate the District's shortfall in its supply of new floorspace for Class B uses.**

New Policy 28 which deals with Retail Development directs new retail floorspace to the District's existing town centres. This follows from national planning guidance and the Council's Retail Study, which was submitted in evidence to the new Local Plan and which identifies capacity within the town centres to accommodate some of the new retail space. The town centres must be the first priority for new retail provision.

In order to ensure Policy 4 is based upon a positively prepared evidence base, that it will be effective in meeting the assessed Class B use employment requirements of the District and not undermine the national led priorities for directing retail floorspace to the town centres, the Policy must be further modified to require the minimum floorspace requirements to refer to Class B1 to B8 floorspace only. This would not preclude other appropriate employment uses from being provided so long as the assessed Class B requirements have been met or following a further interim employment assessment which may be undertaken and which concludes that the amount of Class B space can be reduced and other employment uses permitted.

Policy 4 and its supporting text as currently drafted, also rely on the site specific policies to set out on what basis employment (and other) development will be considered to be 'appropriate'. Given the nature of the allocation sites and, in the case of New Monks Farm and Shoreham Airport their close proximity to each other, Policy 4 should also specify that appropriate development will be appraised against the full range of environmental constraints and cumulative impacts.

**5. Please explain in the box below what change(s) you consider necessary to make the Main Modification(s) to the Adur Local Plan legally compliant and sound having regard to the reason you identified above.**

**(You will need to say why this change will make it legally compliant or sound. It will be helpful if you are able to put forward your suggested or revised wording. Please be as precise as possible).**

To reflect the findings of the Council's Objectively Assessed Requirement for Class B1 to B8 floorspace and the District's lack of capacity to accommodate its entire minimum requirement, Policy 4 must be amended further as follows.

The blue text denotes the additional text required to ensure the Policy has been positively prepared, justified and will be effective and compliant with National Planning Policy (NPPF para 20 – meeting the needs of business, para 158 ensuring the Local Plan is based on adequate and relevant evidence about the economic prospects of the area).

## Policy 4

To facilitate regeneration and ensure a sustainable economy, a total ~~minimum of approximately~~ 41,000 square metres of land will be allocated for appropriate [Use Class B1, B2, B8](#) employment generating uses in Adur up to 2034-2 at the following locations:

- Shoreham Airport (~~approximately~~ [a minimum of](#) 15,000 sqm)
- New Monks Farm (~~approximately~~ [a minimum of](#) 10,000sqm sq.m.)
- Shoreham Harbour Regeneration Area (~~approximately~~ [a minimum of](#) 16,000 sqm within Adur)

These allocations will provide a range of employment sites in terms of locations and sizes, and provision will be made within these allocations for a range of accommodation types.

Other employment generating uses may also be permitted on these sites subject to the above minimum requirements having been met or following an interim review of local employment assessment which determines this requirement should be reduced.

Employment uses will only be permitted on these sites if they are determined to be appropriate based on environmental appraisals that take into full consideration the character and the setting of the sites and all relevant cumulative impacts arising from other neighbouring and nearby development.

Further economic development at the site to the north of the airport, currently occupied by Ricardo, will be supported subject to other policies in this Plan.

In addition to the above provision, additional employment floorspace will also be achieved through redevelopment, intensification, [and](#) change of use to employment, ~~and provision of new employment sites.~~

Outside of designated employment areas, where new development for, or extensions to B1, B2 and B8 uses is proposed, such applications will only be permitted where it is demonstrated they will not have an unacceptable impact on adjacent residential properties and they comply with other policies in this Plan.

Criteria for the identification and provision of new employment floorspace will include the need to provide a variety of new business premises including small and medium sized premises, the need to meet the modern needs of businesses in terms of floorspace, security, quality of environment, good access and services, and ensuring there are no conflicts with neighbouring uses.

Continue on separate sheet if necessary)

6. **Please add any comments in relation to the Addendum to the Sustainability Appraisal of the Adur Local Plan in the box below.**





9.4 Consistent with National Policy ✓

10. **If you consider the Main Modification(s) to the Adur Local Plan to be unsound or not legally compliant, please explain why in the box below:**

**Over riding Objections**

Lancing College has objected to this Policy throughout the consultation stages on the New Local Plan emphasising the need to ensure **access to the Lancing Estate is protected for all transport user groups** and that the existing arrangements at the Sussex Pad that **allow road access into the Estate from both directions (from the east and the west) is maintained**. This is in the interest of maintaining safe and sustainable access for the 600 pupils of the College, the 265 staff of the College and the significant additional occupiers of and visitors to the Lancing Estate.

**The College's objections are not addressed by the Main Modifications to Policy 5. Significant concerns over access linked with the adjoining New Monks Farm site allocation remain.**

In addition to ensuring safe access, the College is a major, long term established employer within Adur and is the custodian of a major estate which includes nationally significant Grade I, II\* and II heritage assets and which forms part of the SDNP, providing an important gateway from the A27 to the landscape and recreational attractions of the National Park.

The College's earlier representations were made on the basis of the declared proposed uses for the New Monks Farm site. The proposals for the site are now known to include a major Ikea retail store and no general Class B employment uses. A major retail outlet of this type will have very different impacts compared with Class B use. Whilst the policy requires an employment generating use to be assessed to be 'appropriate', more significant changes to the Policy are required given that its current

wording does not require any Class B uses to be provided and to ensure the full breadth of environment impacts are appraised and the educational and wider environmental interests and recreational benefits of the Lancing College Estate are protected.

These matters would have been raised at earlier consultation stages on the Plan and Lancing College would have been represented at the EIP had the promoters of New Monks Farm and Adur District Council been open and transparent about the form of development being discussed.

**This policy must be revisited and the EIP reopened if necessary to ensure this Policy can be reconsidered in light of the now known intentions of the site promoters and to ensure the Policy can be found to be sound.**

**Detailed Matters**

**A plan of the Lancing Estate is attached** for reference and in demonstration of the:

- Estate's proximity to the Shoreham Airport and New Monks Farm Sites;

- Estate's dependence on accesses directly off the A27, which means that very close consideration must be given to how the directions of travel may be affected by works to the A27 to accommodate new development south of this road;
- Proximity of the 600 pupils and 265 staff of the College to the A27 and their (and other visitors to the Estate) **susceptibility to increased road traffic and linked increases in air and noise pollution**. The Lancing Estate includes accommodation directly fronting the A27 at the Sussex Pad, along the service roads into the Estate leading from the A27 and within the main campus set back from the A27 but in an elevated position that is only partly screened from the A27;
- Proximity to and visibility from the A27 and the allocation sites of the College's **nationally significant Grade I, II\* and II heritage assets**, such that these assets and their setting are very sensitive to change;

These matters are so significant that they will outweigh any development viability considerations in the consideration of development proposals for the New Monks Farm Site. Whilst the Main Modifications to Policy 5 propose to highlight the significance of development viability, as drafted, it still does not appropriately deal with these other relevant and more significant environmental considerations that will need to be fully appraised as part of any development proposal in order to:

- ensure all the relevant impacts are appraised and mitigated, taking into account other relevant nearby development on a cumulative impact basis;
- ensure Class B uses remain a priority in view of the assessed requirement for this space within the District;
- establish the appropriate developable area / Built Up Area Boundary of the site, to ensure this does not extend too far east and taking into account the site's proximity to the Lancing Estate and the College's main campus which includes a significant number of very significant heritage assets;
- establish the resulting amount, built form and operation controls that will be appropriate within the site and that may need to be mitigated to protect those outside of it;
- include a number of policy requirements that are specified for the adjoining Shoreham Airport site (Policy 7), which are also relevant to New Monks Farm, given that they are subject to the same setting, character and other linked environmental issues.

**11. Please explain in the box below what change(s) you consider necessary to make the Main Modification(s) to the Adur Local Plan legally compliant and sound having regard to the reason you identified above.**

**(You will need to say why this change will make it legally compliant or sound. It will be helpful if you are able to put forward your suggested or revised wording. Please be as precise as possible).**

The Policy must be further amended as follows (text in blue).

**Policy 5: New Monks Farm, Lancing**

**Land at New Monks Farm (within the area shown on Map 2) will be allocated for mixed use development comprising:**

- **A minimum of** 600 homes, 30% of which are to be affordable, providing a mix of types and tenures in accordance with identified needs.
- A community hub.
- 1 hectare of land to accommodate a 1-form entry primary school, with additional land for expansion to 2-form entry in the future.
- ~~Approximately~~ **A minimum of** 10,000sqm of **Class B1 to B8 floorspace**
- **Other** appropriate employment generating floorspace subject to it being possible to accommodate this taking into account the above requirements and the environmental considerations for the site.
- Suitable access onto the A27 in agreement with Highways England.
- Provision or funding of mitigation for off-site traffic impacts on the Strategic Road Network and local roads through a package of measures including improvements to the A27/Grinstead Lane (North Lancing roundabout) junction.
- Provision of sustainable transport infrastructure including improved public transport and cycle, pedestrian and equestrian links ~~to~~ **with** Lancing, Shoreham-by-Sea and the South Downs National Park.
- Site-specific travel behaviour initiatives which encourage sustainable modes of transport. (This should include a package of travel behaviour initiatives such as residential and workplace travel plans).

The Withy Patch Gypsy and Travellers site should be relocated to allow for the delivery of the new roundabout access onto the A27, and increased in size. The new site should be built at a higher level to reduce flood risk and to take the site out of Flood Zone 3.

This will enable the provision of additional pitches in the future to meet identified needs.

**Improved access across the A27 ~~to~~ **with** the South Downs National Park for pedestrians, cyclists and equestrians must be provided and direct road access from both the east and the west into the Lancing College Estate must be maintained as part of any improvement works. Developers will need to work with Adur District Council, West Sussex County Council and the Environment Agency to ensure that tidal and fluvial flooding as well as surface water and groundwater flooding are adequately mitigated without worsening flood risk elsewhere. A Flood Risk Assessment (FRA) will be required at the planning application stage. The FRA must take account of and seek to facilitate relevant recommendations of the Lancing Surface Water Management Plan **and must also set out a strategy for the long term management and maintenance of drainage on the site.****

As part of a Landscape Strategy/Green Infrastructure Strategy for the site, the following are to be delivered:

- Ecological enhancements in the north-west corner of the site in order to address the safeguarding and enhancement of biodiversity assets.
- Retention and enhancement of the existing network of water bodies on site for drainage and ecological benefits.
- Open space and recreation areas (to include children's play areas) located within the development, and provision for formal sports, in accordance with Council standards.
- A Country Park and informal recreation (~~approx.~~ **A minimum of** 28 hectares).
- Strategically sited areas of woodland to the north and east of the development area to provide a distinctive 'green

edge', screening views of the new development.

A number of assessments will also be required at the planning application stage. These [must be taken on a cumulative impact basis and](#) will include:

- A desk-based assessment and, where necessary, a field evaluation of archaeological assets which should be undertaken before determination of any application. Reference should be made to the West Sussex Historic Environment Records.
- [A landscape and visual impact assessment](#)
- [A Built Heritage Assessment taking into account the impact of development on the setting of the heritage assets within the Lancing College Estate](#)
- [External lighting impact assessment to ensure additional light spill from the southern side of the A27 is not increased further beyond existing baseline levels](#)
- A site wide landscape and ecological management plan [that is informed by up to date ecological information](#)
- [A Transport Impact Assessment and Linked Noise and Air Quality Impact Assessments](#)

[These assessments must be](#) produced, [taking into account all relevant cumulative effects with other implemented and permitted developments](#) and implemented to the satisfaction of the local planning authority to ensure the long-term maintenance of retained and newly created on-site habitats. Appropriate mitigation of any issues raised through these assessments is to be delivered.

The development of this site, the location and layout of built development, green infrastructure and other landscaping is to be based on the following principles and site-specific requirements:

- Development must respect the landscape of the surrounding countryside and the South Downs National Park.
- [The setting of the heritage assets within the Lancing College Estate, taking into account the proposed scale, height, materials, signage and external illumination across the site and any paraphernalia associated with proposed employment development that must be appropriately screened](#)
- Affordable housing is to be distributed throughout the development.
- The development is to be connected to sewerage and water distribution networks at the nearest points of adequate capacity, as agreed with Southern Water.

Development will be phased in order to:

- Ensure the Withy Patch Gypsy and Travellers site is relocated prior to the construction of the new roundabout access onto the A27.
- Ensure delivery of a new A27 access at an appropriate stage of development.
- [Ensure unrestricted, safe access for all transport user groups to and from the Lancing College Estate at all times.](#)
- Facilitate use of the community hub and primary school at a stage to be agreed with West Sussex County Council and

Adur District Council.

Infrastructure requirements are to be secured through CIL/ s106/planning conditions as appropriate.

The eastern boundary of the Built Up Area at New Monks Farm as shown on the Policies Map is indicative. The final boundary will be determined at the planning application stage, having regard to landscape, heritage, access, transport, and transport related impacts drainage, and viability considerations. However, any amendments to the boundary currently shown on the Policies Map must be based on a clear and convincing justification. A Development Brief will be required to address these issues.

12. **Please add any comments in relation to the Addendum to the Sustainability Appraisal of the Adur Local Plan in the box below.**

### **Part B – Representation**

**Please use separate sheets for each Main Modification you wish to comment on.**

13. **Which Main Modification to the Adur Local Plan does this representation relate to?**

**Amendments relating to:**

Main Modification no: **MM17 and MM20 – Policy 7 – Shoreham Airport**

or

Sustainability Appraisal

*(Please state which part):*

**Please go to Q6 to comment on the Sustainability Appraisal**

14. **Do you consider the Main Modification(s) to be:** (tick as appropriate)

2.1 Legally Compliant    Yes                          No   

2.2 Sound                                      Yes                          No   

**Please read the Guidance Note for guidance on legal compliance and soundness.**

**If you have ticked no to 2.1, please continue to Q4.**

**If you have ticked no to 2.2, please continue to Q3.**

**If you have ticked yes to 2.1 and 2.2 please go to Q7.**

15. **Do you consider the Main Modification(s) to the Adur Local Plan to be unsound because it is not:** (tick as appropriate)

15.1 Positively Prepared                     

15.2 Justified                                     

15.3 Effective                                     

15.4 Consistent with National Policy



16. **If you consider the Main Modification(s) to the Adur Local Plan to be unsound or not legally compliant, please explain why in the box below:**

This site is located further from the Lancing College Estate, but the proposed modifications to Policy 7 do allow for the Airport development site to be amended and the level of development to be increased beyond the minimum specified.

The impact of this development must therefore still be appraised in terms of its impacts on the Lancing College Estate, taking into account

- the sensitivities of the Estate being in a residential educational use,
- the College's accommodation that directly fronts onto the A27 close to the Airport,
- the heritage assets within the Estate that are visually dominant, looking over and toward the Airport and
- the need to consider the cumulative impacts of development on the College Estate with the New Monks Farm proposals.

Further amendments are required to Policy 7 in order to ensure the full breadth of environmental matters are addressed.

17. **Please explain in the box below what change(s) you consider necessary to make the Main Modification(s) to the Adur Local Plan legally compliant and sound having regard to the reason you identified above.**

**(You will need to say why this change will make it legally compliant or sound. It will be helpful if you are able to put forward your suggested or revised wording. Please be as precise as possible).**

The following amendments are therefore also requires to Policy 7 (blue text)

### **Policy 7: Shoreham Airport**

Approximately A minimum of 15,000 sqm of new employment generating floorspace (both aviation and non-aviation related), including a mix of B1 (business), B2 (general industry) and B8 (storage)/hangar uses, will be provided on the north-eastern side of the Airport (as shown on the Policies Map). Any deviation from the boundary shown on the Policies Map must be based on a clear and convincing landscape, heritage, access, transport and transport related noise and air quality impacts and viability justification through the planning application process.

New development at the Airport must be designed to minimise its impact on the landscape as well as on the open nature of the Shoreham-Lancing Local Green Gap. Key views must be retained, and any impacts on the historic character of the Airport and the historic assets within it and within the Lancing College Estate must be minimised. A Development Brief will be required to address these issues.

New development at the Airport will result in a need for improved access from the A27. Access across the A27 to with the South Downs National Park for pedestrians, cyclists and equestrians must be retained, and where possible, enhanced and must also ensure that direct road access from the east and the west is maintained for the Lancing College Estate. New development will also be required to contribute to the provision or funding of mitigation for offsite traffic impacts on the strategic road network and

local roads through a package of measures including improvements to the A27/A2025 Grinstead Lane junction.

A package of site- specific travel behaviour initiatives to maximise opportunities to encourage sustainable modes of transport will be required. (This should include travel behaviour initiatives such as workplace travel plans). These initiatives will include

improvements to adjacent footpaths, cycle ways and bus transport, linking the Airport to the A259 coast road and Shoreham town centre. A travel plan will need to accompany any future planning application at the site, detailing sustainable transport measures to reduce the impact of development on the highway network.

Due to the current Flood Zone 3b (functional floodplain) designation at the Airport, no development shall take place within the allocated area until the relevant section of the Shoreham Adur Tidal Walls on the west bank has been completed. In addition, flood mitigation measures will need to be incorporated into the development in order to further reduce flood risk. A Flood Risk Assessment (FRA) will be required at the planning application stage. The FRA must take account of and seek to facilitate

relevant recommendations of the Lancing Surface Water Management Plan.

Mitigation measures will be required to ensure that new development at the Airport does not impact on the ecological value of the airport itself or the adjacent Adur Estuary SSSI. Ecological enhancements should be incorporated as an integral part of the development.

A number of assessments will also be required at the planning application stage. These [on a relevant cumulative impact basis and](#) will include:

- A desk-based assessment and, where necessary, a field evaluation of archaeological assets which should be undertaken before determination of any application. Reference should be made to the West Sussex Historic Environment Records; and
- A site wide landscape and ecological management [plan that is informed by up to date ecological information](#) to be drawn up and implemented [to the satisfaction of the local planning authority](#) to ensure the long-term maintenance of retained and newly created onsite habitats.
- [A landscape and visual impact assessment](#)
- [A Built Heritage Assessment taking into account the impact of development on the setting of the heritage assets within the Lancing College Estate](#)
- [External lighting impact assessment to ensure additional lightspill from the southern side of the A27 is not increased beyond existing baseline levels and are preferably reduced so long as safety standards at the Airport are not affected](#)
- A site wide landscape and ecological management plan [that is informed by up to date ecological information](#)

- [A Transport Impact Assessment and Linked Noise and Air Quality Impact Assessments](#)

Any new development at the airport must not jeopardise the runway use or airport operations.

Within the existing developed area located at the southern end of the Airport, airside locations will be protected and supported for aviation-related B1, B2 and B8/hangar uses. Non-airside locations will be protected and supported for aviation-related B1, B2 and B8/hangar uses and for non-aviation related B1, B2 and B8 uses where it can be demonstrated that the use will not impact the operational viability of the Airport. Appropriate aviation-related training uses will also be supported. However, training which does not require access to operational facilities will not be supported in airside locations. Infrastructure requirements are to be addressed through s106/CIL/planning conditions as appropriate

Continue on separate sheet if necessary)

18. **Please add any comments in relation to the Addendum to the Sustainability Appraisal of the Adur Local Plan in the box below.**

### **Part B – Representation**

**Please use separate sheets for each Main Modification you wish to comment on.**

19. **Which Main Modification to the Adur Local Plan does this representation relate to?**

**Amendments relating to:**

Main Modification no: **MM27 – Policy 13 – Adur’s Countryside and Coast**  
or  
Sustainability Appraisal  
(Please state which part):

**Please go to Q6 to comment on the Sustainability Appraisal**

20. **Do you consider the Main Modification(s) to be:** (tick as appropriate)

2.1 Legally Compliant Yes  No

2.2 Sound Yes  No

**Please read the Guidance Note for guidance on legal compliance and soundness.**

**If you have ticked no to 2.1, please continue to Q4.**

**If you have ticked no to 2.2, please continue to Q3.**

**If you have ticked yes to 2.1 and 2.2 please go to Q7.**

21. Do you consider the Main Modification(s) to the Adur Local Plan to be unsound because it is not: (tick as appropriate)
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21.1 Positively Prepared

21.2 Justified

21.3 Effective

21.4 Consistent with National Policy

**22. If you consider the Main Modification(s) to the Adur Local Plan to be unsound or not legally compliant, please explain why in the box below:**

This policy currently stresses the need to protect 'heritage'.

The main modification to this policy relates to the need to also respect the **setting** of the South Downs National Park.

Whilst heritage matters are dealt with elsewhere in the new Local Plan, in the interests of completeness, the amended wording to Policy 13 should be extended to refer to the need to respect the **setting of heritage assets**.

**23. Please explain in the box below what change(s) you consider necessary to make the Main Modification(s) to the Adur Local Plan legally compliant and sound having regard to the reason you identified above.**

**(You will need to say why this change will make it legally compliant or sound. It will be helpful if you are able to put forward your suggested or revised wording. Please be as precise as possible).**

The requested additional wording is in blue text below.

### **Policy 13: Adur's Countryside and Coast**

Outside of the Built Up Area Boundary, development will only be permitted where the need for a countryside location is essential; it is for quiet informal recreation or the essential needs of agriculture or horticulture, flood management, or is otherwise consistent with this Local Plan (or subsequent DPDs). Improvements to green infrastructure, including enhanced pedestrian, cycle, and equestrian access (where appropriate), and better access for those with mobility difficulties will be supported. The extension of isolated groups of buildings or the consolidation of linear or sporadic development will not be permitted.

Any development in the countryside should not result in a level of activity which has an adverse impact on the character of the area.

Future development at the site currently occupied by Ricardo will be supported subject to there being no adverse impact on the setting and function of the countryside and the Lancing–Shoreham-by-Sea Local Green Gap.

The landscape character of Adur and other areas of countryside, the coast, river, and settlement pattern will be protected and where possible enhanced. Any development or activities within the countryside must respect and where appropriate reinforce the setting, distinctiveness and sense of place of the above areas, taking into account the various elements which contribute to their distinctiveness such as geology and landform, biodiversity, scenic quality, strategic views, tree cover, settlement patterns, heritage

and local vernacular, and land use. The setting of the South Downs National Park [and of nationally and locally listed heritage assets](#) must also be respected.

The appropriate change of use or conversion of existing buildings in the countryside will be permitted providing that:

- they are structurally sound and of permanent construction,
- they are in keeping with their surroundings in terms of form, bulk, design and materials;
- the proposals do not involve the erection of substantial extensions or the substantial demolition and rebuilding of existing buildings, and
- the proposals for conversion or change of use would conserve the character, fabric and setting of the building; and
- there is no adverse impact on biodiversity that cannot be mitigated to an acceptable level

In the case of residential buildings, any extensions should be subservient to the existing building.

Opportunities to improve access to the South Downs National Park will be sought through joint working with the South Downs National Park Authority and West Sussex County Council.

Proposals for equestrian development in the countryside will normally be granted where existing buildings are utilised. New buildings or associated development for such uses will only be permitted if they are well-sited in the landscape, and do not result in sporadic development that erodes the open character of the landscape.

Development to support informal recreation uses on the coast will normally be permitted subject to:

- (i) built facilities being located within the adjacent Built Up Area.
- (ii) the need to maintain and improve sea defences.

Best practice guidance published by the Government, the Council and other bodies will be used when assessing applications.

Continue on separate sheet if necessary)

24. **Please add any comments in relation to the Addendum to the Sustainability Appraisal of the Adur Local Plan in the box below.**

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**Part B – Representation**

**Please use separate sheets for each Main Modification you wish to comment on.**

25. **Which Main Modification to the Adur Local Plan does this representation relate to?**

**Amendments relating to:**

Main Modification no: **MM37 – Policy 35 – Pollution and Contamination**

or

Sustainability Appraisal

*(Please state which part):*

**Please go to Q6 to comment on the Sustainability Appraisal**

26. **Do you consider the Main Modification(s) to be:** (tick as appropriate)

2.1 Legally Compliant Yes  No

2.2 Sound Yes  No

**Please read the Guidance Note for guidance on legal compliance and soundness.**

**If you have ticked no to 2.1, please continue to Q4.**

**If you have ticked no to 2.2, please continue to Q3.**

**If you have ticked yes to 2.1 and 2.2 please go to Q7.**

27. **Do you consider the Main Modification(s) to the Adur Local Plan to be unsound because it is not:** (tick as appropriate)

27.1 Positively Prepared

27.2 Justified

27.3 Effective

27.4 Consistent with National Policy



**28. If you consider the Main Modification(s) to the Adur Local Plan to be unsound or not legally compliant, please explain why in the box below:**

**The proposed amendment** to this policy that requires development, which does not meet required standards, to be **refused, is welcomed and supported.**

Noise, air quality and light spill are very significant concerns for Lancing College taking into account the proximity of the College's accommodation and wider Estate buildings to the A27 and, leading from this, the need for the College to protect the long term interests of its 600 pupils, 265 staff and the significant additional occupiers of and visitors to the Lancing Estate.

These matters are brought into sharp focus by the proposed allocation of two major strategic sites on the south side of the A27 and in particular by the proposals for a major Ikea retail store at New Monks Farm which will generate significant traffic and linked noise and air quality concerns but also additional operational light spill.

The development of the New Monks Farm and Shoreham Airport strategic sites must be supported by appropriate assessments that include agreed assessment points within the Lancing Estate and which will require access to the Estate. These assessments must also be taken on a cumulative impact basis, as well as based upon existing background emission levels.

Other development sites may also need to be subject to the same requirements and to the same potential cumulative impacts from nearby developments.

**29. Please explain in the box below what change(s) you consider necessary to make the Main Modification(s) to the Adur Local Plan legally compliant and sound having regard to the reason you identified above.**

**(You will need to say why this change will make it legally compliant or sound. It will be helpful if you are able to put forward your suggested or revised wording. Please be as precise as possible).**

To ensure the requirements of pollution based assessments are set out more clearly and are required to be undertaken on a cumulative basis when connected with major development sites, Policy 35 should be amended further as indicated by the blue text below.

**Policy 35: Pollution and Contamination**

Development should not result in pollution or hazards which prejudice the health and safety of the local community and the environment, including nature conservation interests and the water environment.

New development in Adur will be located in areas most suitable to the use of that development to avoid risks from noise, air, odour or light pollution.

Mitigation measures will need to be implemented for developments that could increase levels of pollution or have a negative impact on drinking water supplies in Adur. Where ~~there are significant increased~~ levels of ~~increased~~ pollution ~~that~~ cannot be mitigated, development will be ~~resisted~~ refused.

Where appropriate, air quality assessments and/or noise assessments will be required in conjunction with development proposals. ~~These may require access to be agreed with the relevant landowners and will be required to be undertaken on a cumulative impact basis where relevant, including for the strategic development sites allocated within this Plan.~~

Investigations and assessments of all sites situated in or in close proximity to potentially contaminated land will be required in relation to relevant development proposals.

Continue on separate sheet if necessary)

30. **Please add any comments in relation to the Addendum to the Sustainability Appraisal of the Adur Local Plan in the box below.**

