

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: **MM6 to MM11 – Policy 5 – New Monks Farm**

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:**

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.

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).

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 Wither 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.](#)

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