

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: **MM17 and MM20 – Policy 7 – Shoreham Airport**

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:

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.

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 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)

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