

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: **MM37 – Policy 35 – Pollution and Contamination**

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:**

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.

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 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)

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