

Hearing Statement

On behalf of

Albemarle (Shoreham) LLP
Respondent Ref. 65

and

DMH Stallard LLP
Respondent Ref. 38

Hearing Issues 2, 5 and 6

Prepared by DMH Stallard LLP

Hearing Statement
on Behalf of
Albemarle (Shoreham) LLP

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Contents

1.1 Introduction 1!

2.1 Issue 2: Planning for Economic Growth (policy 4) 2!

3.1 Issue 5: New Monks Farm, Lancing (policy 5) 3!

4.1 Issue 6: Shoreham Airport (policy 7) 6!

5.1 Conclusions 7!

Appendices

1 Map of Shoreham Airport Site

1. Introduction

1.1 This statement contains representations for Albemarle (Shoreham) LLP in respect of the Adur Local Plan 2016 (ALP), specifically in response to Document ID/3 Rev 2 Issues and Questions.

1.2 In summary Albemarle (Shoreham) LLP:

- Endorse the overall strategy of the ALP
- Support the allocation at both New Monks Farm and Shoreham Airport
- Seek important main modifications to:
 - Policy 4 – enabling increased employment generating floorspace at both New Monks Farm and Shoreham Airport.
 - Policy 5 – enabling increased employment generating floorspace, a revised built up area boundary to take account of the above and ensure an appropriate and sympathetic residential layout taking into account constraints (Map 2).
 - Policy 7 – enabling increased employment generating floorspace at Shoreham Airport with consequential extension of the proposed allocation (Map 4).

1.3 It is considered that the ALP Sustainability Appraisal (SEIA) would need to be updated to take into account the impact of the suggested revisions to the ALP.

1.4 Albemarle (Shoreham) LLP in supporting the ALP consider the proposed allocations at New Monks Farm and Shoreham Airport provide a unique range of benefits to the future planning and well being of Adur District comprising; significant employment opportunities, strategic housing delivery, enhanced/extended gypsy/traveller provision, a large Country Park and flood mitigation for existing and proposed properties.

2. Issue 2: Planning for Economic Growth (policy 4)

2.1 - The NPPF confirms the importance that is to be attached to building a strong competitive economy (e.g. paragraph 19). Has the Council attached sufficient weight to achieving this objective? If not what more should be done?

- 2.1 The Employment Land Review 2014 (ELR) recommends, given demand, up to 60,000 m² of commercial floorspace.
- 2.2 In order to meet the employment aspirations of the plan it is considered that the policy should increase the allocations or at least indicate that the figures stated are minimum/"at least" figures.
- 2.3 It is considered that to ensure compliance with NPPF para 19 and deliverability of Shoreham Airport/New Monks Farm the allocations/policy area should be increased to accommodate additional floorspace.

2.2 - Policy 4 refers to provision being made at the 3 identified employment locations 'for a range of accommodation types'. Firstly how would a decision-taker know what 'type' of accommodation would be acceptable on a particular site and secondly how would the Council ensure, over the course of the plan period, that a satisfactory 'range' would be achieved?

- 2.4 Paragraph 2.44 of the ALP indicates that the Shoreham Harbour site is most likely to accommodate B1 uses. Shoreham Airport is most appropriate for non B1(a) uses, whilst New Monks Farm is justifiably a location for a flexible employment generating use, given its location away from existing commercial uses.
- 2.5 In order to take full account of para 18 – 22 of the NPPF it is considered that additional prescription within the policy is unjustified as it would act as a significant impediment to sustainable economic growth.

3. Issue 5: New Monks Farm, Lancing (policy 5)

5.1 - Are all the requirements of policy 5 reasonable, justified, viable and deliverable?

- 3.1 Albemarle (Shoreham) LLP consider the requirements under Policy 5 are justified, viable and deliverable, but only with revisions to the policy and proposals map and the support of LGF funding (subject to the comments at paragraph 3.6 below). It is our view that amendments to the Local Plan are essential to make the New Monks Farm allocation viable and commercially deliverable.
- 3.2 We support the New Monks Farm allocation and in view of the Council's shortfall against their Objectively Assessed Housing Need summarised at Paragraphs 2.20 to 2.22 believe that the release of this land for development is essential. However, it is our view that Policy 5 as currently drafted is not sound because it fails to provide sufficient flexibility and is not considered to be positively prepared.
- 3.3 We support the wording of 'appropriate employment generating floorspace' as this provides flexibility with regard to the type of commercial floorspace provision, thereby enhancing the viability and delivery of the allocation. We would emphasise the need for flexibility to ensure that the development can accommodate "modern operator's requirements" and the need to recognise the significant employment opportunities associated with a range of uses not just traditional B Class operators.
- 3.4 It is considered that setting a maximum limit on the amount of employment generating uses at New Monks Farm is too restrictive and not positively prepared. In order that the Council can satisfy themselves that at least 10,000 m² of employment generating space will be provided at New Monks Farm this level should be referred to as a minimum. Clearly, should any future developer seek to provide additional floorspace, such provision should be treated positively, provided that it complies with other policies within the ADLP, as well as guidance provided within the NPPF. Based on our site analysis, it is considered that there is no justifiable reason to limit the employment floorspace provision, either in terms of overall floorspace or in terms of the footprint of the development.

5.3 - Have issues of flood risk in relation to this site been adequately addressed (see also question 13.5)? Has the advice in the NPPF (for example paragraph 100) been followed?

- 3.5 We are working collaboratively with New Monks Farm Development Ltd and EA, SWS, WSCC (as lead drainage authority) and have a continuing series of meetings to ensure robust drainage strategy is developed.

5.5 - Is it sufficiently clear what new infrastructure is required, who is going to fund it and how it relates to the anticipated rate and phasing of development (PPG paragraph 018 under Local Plans)?

- 3.6 It is hoped to be able to provide additional information on viability of both the New Monks Farm and Shoreham Airport sites prior to the Hearings. One of the reasons for delaying the submission of this information is that a decision on Local Growth Funding is awaited and due prior to the end of January 2017.
- 3.7 The Adur Place Plan, co-produced by the Adur District Council and WSCC, includes New Monks Farm as a priority area that will deliver higher GVA, jobs, homes and employment space. Adur District Council is seeking £9.43m Local Growth Funding to lever in £44m of private sector matched funding to deliver the economic growth outcomes in Shoreham.
- 3.8 Local Growth Funding will be used specifically for the provision of the essential road infrastructure to unblock the development of this area of Shoreham. A new road junction on the A27 is required to provide access of sufficient capacity for new homes and commercial developments. Once complete, the commercial development at Shoreham Airport is likely to follow, funded by private sector investment.
- 3.9 The project is to develop a strategic employment and housing growth centre in Shoreham. The new road infrastructure will also have wider benefits for all current residents of the area and importantly local businesses; for example:
- One of Coast to Capital's internationally award winning employers, Ricardo, who in addition to 4% of total revenue invested in research & development, have invested circa £5m each year on capital expenditure at their Shoreham facility for the past five years. As a major employer in Shoreham and the Greater Brighton City Region, Ricardo currently employ c700 people across a range of higher skilled, technical, engineering and professional services specialisms;
 - Lancing College for their staff, students and parents with an easier right and left turn to alleviate congestion;
 - Staff and students at a Northbrook College campus - an award winning Further Education College; and
 - The c50 aviation businesses and other companies located at Shoreham Airport.
- 3.10 Without investment in the new road infrastructure the ability of the private and public sectors to develop and invest in the Shoreham Airport area is unlikely.
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5.6 - Would any element of the proposed development have a detrimental impact on the setting of the WWII Trainer Dome Scheduled Monument?

- 3.11 It is accepted that the proposed development would have a moderate impact on the setting of the Trainer Dome mainly due to the link road to the airport.
- 3.12 Removal of the Trainer Dome from the airport's restricted zone will provide the opportunity for the public to access the monument. In consultation with Historic England, West Sussex County Council and Arun District Council, a scheme will be developed that commissions a conservation management plan, facilitates external public access and delivers heritage interpretation. The removal of the raised area from around the dome would have a beneficial effect with the advantage of making the dome more visible.
- 3.13 The adverse effects of a new service road beside the trainer dome will be mitigated by the access it will allow to the monument and the opportunities it affords for heritage interpretation.
- 3.14 Reference should be made to the "acta" report which considers the trainer dome to be of low value. However, the ALP allocations give an opportunity to enhance the immediate setting.

4. Issue 6: Shoreham Airport (policy 7)

6.1 - Are all the requirements of policy 7 reasonable, justified, viable and deliverable?

- 4.1 The allocation of 15,000 m² of B1/B2/B8 floorspace is welcomed and supported. However, given the ground conditions and the need for a new access road, the floorspace would need to be increased to 25,000 m² along with the suggested revisions to the proposals map (see paragraph 5.4 below) and the support of LGF funding (subject to the comments at paragraph 3.6 above) to constitute a viable and commercially deliverable scheme.
- 4.2 The extension of the site to the south (as shown on the map at Appendix 1) could accommodate the necessary level of floorspace. Subject to careful siting and design it is considered that the additional floorspace could be accommodated without unacceptable landscape or other impacts.
- 4.3 The owners of the airport and New Monks Farm are working together to ensure delivery of these important strategic sites. Subject to the suggested policy revisions and LGF funding the sites are viable.
- 4.4 The collaborative working will ensure the delivery of the A27 Access to allow both developments to come forward, including facilities for pedestrians, cyclists and equestrians. The A27 Access would be designed with sufficient capacity to accommodate the larger development (proposed at both New Monks Farm and Shoreham Airport), with preliminary capacity assessments demonstrating that this is achievable. Improvements at the A27/Grinstead Lane are deliverable as indicated in the Adur Local Plan Second Addendum: Revised Reissue September 2016 Transport Study, however, further assessment work would be required via a Transport Assessment for the development.

6.3 - What mitigation measures will be required in order to retain ecological value? Will their delivery have any implications in terms of the viability and delivery of the policy?

- 4.5 Initial survey work undertaken by the owners indicates that the site has no ecological constraints.

5. Conclusions

5.1 Revisions are required to make the plan sound and meet soundness test 1 (positively prepared). These are set out below.

5.2 The wording of Policy 4 should be amended as follows:

“Policy 4: Planning for Economic Growth

To facilitate regeneration and ensure a sustainable economy, a total of ~~approximately 41,000~~ 51,000 – 76,000 square metres of land will be allocated for appropriate employment generating uses in Adur up to 2031 at the following locations:

- *Shoreham Airport (approximately ~~15,000~~ 25,000 sqm)*
- *New Monks Farm (approximately 10,000 - 35,000 sqm)*
- *Shoreham Harbour Regeneration Area (approximately 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...”

5.3 The wording of Policy 7 should be amended as follows:

“Policy 7: Shoreham Airport

Approximately ~~15,000~~ 25,000 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...”

5.4 Map 4 should be replaced with the map attached at appendix 1 to this document.