

CPRE Sussex Responses to Issues and Questions

The Adur Local Plan 2016

Issue 1: Duty to Co-operate (policy 2)

1.1 No reference is made in the Adur Local Plan to the likely redevelopment of the Lower Beeding Cement Works which is included in South Downs National Park Authority draft Local Plan and falls within Horsham District with a smaller area in Adur District.

Proposals presented by the South Downs Project which have been informally discussed with SDNPA planners, local MPs Tim Loughton and Nick Herbert, Government officials and politicians, CPRE Sussex and the Shoreham Society, currently envisage a complex mixed major development including some 2,000 homes. We understand that this will contribute to the housing need in Adur and surrounding authorities by 2032 and therefore needs consideration and inclusion.(Ref para 1.3)

1.2 Neither Shoreham Beach nor Sompting Neighbourhood Plans are ready for examination. Shoreham Beach NP has no available sites for development of six plus homes other than sites identified by Adur in the SHLAA. Some windfall sites may become available and we contend that windfall sites for more houseboat accommodation are also possible on Shoreham Beach's foreshore. Sompting NP will not reveal further opportunities for housing beyond those identified by Adur in the ALP the parish council confirms. (Ref para 1.6)

Issue 2: Planning for Economic Growth etc (policies 4,26,27,28).

2.1 G L Hearn identifies a job deficit in Adur and previous growth of 212 jobs pa, given post BREXIT predictions of an economic slowdown, the forecast annual job growth of 251-282 seems too high and not related to the identified employment locations. The lack of accommodation for offices and manufacturing is highlighted but is unlikely to be satisfactorily addressed by the Plan. (Ref para 2.2)

2.2 Despite the coast to Capital Local Enterprise Partnership's investment in the Environment Agency's Tidal Wall scheme to protect Shoreham Airport from river flood risk, we are not clear how economic development will be protected from the multi factorial sources of inundation across the Adur flood plain and as it extends to New Monks Farm (and New Salts Farm) particularly with the >75% risk of groundwater flooding.

2.3 We are aware through local residents that there has been considerable development of the Visitor Economy in Shoreham Town Centre prompted by the new Ferry Bridge, the success of the Farmers' and Artisan Markets, the Ropetackle Arts Centre and similar venues, restaurants and hostelrys and Shoreham Wordfest and Riverfest, over the last decade. Shoreham is advertised as a key part of Worthing's attractions and Shoreham Beach attracts many non residents, and many thousand young people attended two Wildlife Festival rock concert events on Shoreham Airport. Such activities and events highlight the shortage of hotels and B&B accommodation in Shoreham which AirBnB has attempted to service when visitors choose not to use visitor accommodation in Brighton or Worthing which areas currently benefit from this need. This requires addressing by the Local Plan.

Issue 3: Housing Provision etc (policies 3,21,22,23,24,25)

3.1 We would wish to discuss the various questions raised by the Inspector during the consideration of the suggested requirements for housing provision, at the hearing.

3.2 We suggest that there is unconsidered potential for developing starter home flats and studio accommodation over several uncovered car parks adjoining local retail or railway provision and the Shoreham Centre in Adur.

3.2 As previously mentioned, no increase in houseboat development has been included in the Local Plan we consider that the current riverside flood wall improvements should enable an increase in houseboat numbers.

3.3 The traditional patterns of movement for gypsies and travelling people require co-ordination across the Southern Counties, including Kent, E and W Sussex and Hampshire, to ensure that sufficient pitches/plots are available on both permanent and transit site/yards. We are therefore pleased to see a small increase from 12 to 16 pitches if/when the Withy Patch site is moved. (Ref para 3.15)

Issue 4: Land at West Sompting (policy 6)

4.1 CPRE is concerned that the land at both West Sompting and New Monks Farm currently contribute to creating Green Gaps between Worthing and Sompting and Lancing and Shoreham, already there is coalescence in the east where Brighton and Hove and Adur boundaries meet. Given the strong pressure for a greater Brighton to develop along the coast to the west, we support very clear Green Gaps and in their

absence boundaries strongly demarcated by strategic landscaped woodland buffers; what Adur imagines this to be requires clarification.

4.2 We have drawn attention in our written submission to flooding issues in Sompting and Lancing and now require clarification of the appropriate sewer and drainage systems that will be effective if the required level of development is to take place here. (Ref para 4.3)

4.3 We welcome further clarification of the new infrastructure requirements set out in para 4.6.

Issue 5: New Monks Farm, Lancing

5.1 CPRE Sussex raised the considerable flooding problems in its representations to the 2014 Adur Local Plan and we have raised further issues in our current written submission. (Ref para 5.3)

5.2 There is little clarity about the overall shape of this development at New Monks Farm (NMF) much of which land was previously identified for development as a golf course. We require clarity about how NMF might be assisted to constitute a sustainable, healthy and lively community. Given the known traffic bottleneck problems approaching the current traffic lighted junction to Shoreham Airport and to the Lancing roundabout on the A27, the issue of how new A27 access and a roundabout to replace the traffic lights will work or improve existing traffic flow has yet to be demonstrated. At this stage we feel that HE should be giving a lead on how this could be managed and the feasibility for improved traffic flows resulting from these infrastructure changes or otherwise. Is it envisaged that the changes to the local road system, including the new roundabout, will precede building development. We welcome responses to issues related to funding new infrastructure to match the development phases. (Ref paras 5.4,5.5)

Issue 6: Shoreham Airport (policy 7)

6.1. Currently the Environment Agency has been taking significant measures to re-home wildlife affected by the Tidal Walls flood protection on the foreshore, recognising the impact on the land side of the earth embankment. The need to provide a buffer to the Adur Estuary SSSI is acknowledged but there is little clarification of the protection of, or mitigation for, the biodiversity and ecological integrity of, the sensitive site identified for development at the airport. Safeguarding this precious landscape highly valued by local people is important if it is not to slip into becoming a poorly managed development site. (Ref para 6.3)

Issue 7: Countryside and Coast including Green Gaps (policies 13 and 14)

7.1 Protecting the countryside for future generations has been the goal of CPRE for 90 years, we now work to balance the need for sustainable housing with this duty, so we

seek to support the right developments in the right places, and the maintenance or creation of a sense of place ('making places').

The quality of Adur District has been developed over some 2,000 years; it now centres on Shoreham's historic town with its superlative Norman church, St Mary de Haura, at its core. However the district offers few significant sites for development. While the district's eastern border runs into Brighton and Hove without a Green Gap, Adur's western boundary is differentiated by a significant Green Gap developed around Shoreham Airport, and the River Adur flood plain. The New Monks Farm and Sompting developments significantly erode that Green Gap separation. We suggest that protecting the separation and setting of settlements and avoiding further coalescence needs to be more clearly demonstrated in the Local Plan. (Refs paras 7.1,7.2,7.3)

Issue 10: Transport and Infrastructure (policies 29 and 30)

10.1. CPRE Sussex are currently stakeholders at the discussions on the proposals for improvements to the A27 including the sections through Lancing, Worthing and Sompting. Problems with the A27 are currently considered to lack any permanent solution as the road is often operating at capacity and further housing development therefore restricted; at best mitigation through junction improvements is regarded as most helpful in the sections closest to the New Monks Farm Development. As the road here is also prone to flooding, we suggest that Highways England and the Environment Agency be asked to show how access from the development to the A27 can be managed from 600 homes/10,000sqm business development/ school at peak times, either from the suggested new roundabout replacing the traffic lighted junction to Coombes and the airport, or from the existing albeit improved roundabout on the A27 at Lancing.

Whilst the Shoreham Harbour development plan is not under examination at this point, there will be impact on the A259 west of the Norfolk Bridge where it serves the area of Lancing and Sompting. The A259 Brighton Road from Southwick to Shoreham Town centre is already at capacity and serves as the main east/west coast road for access to Brighton or Worthing. The major brownfield site for 1100 homes on the harbour side (part of the JAAP) is only served by this road. Currently, the Adur Local Plan suggests that unspecified improvements to the roundabout at A259 junction at Shoreham's Norfolk Bridge would be sufficient to ameliorate any likely problems caused by the 1100 new homes; the Local Plan needs to clarify how this might be accomplished. Highways England or its subcontractors should be asked to explain how the traffic infrastructure improvements will ameliorate problems from the new housing developments at all the key sites.

Issue 11: Green Infrastructure, Biodiversity and Open Spaces (policies 31-33)

11.1 Adur Council is committed to encouraging more healthy lifestyles including greater physical exercise across all age groups but particularly for older people, yet it is forced to acknowledge a considerable shortfall in the availability of both indoor and outdoor sports and recreation facilities, and of slipways for boats. Happily, it recognises the need for improvement to many existing facilities and identifies some sources of funding. However when it comes to Green Infrastructure and biodiversity no sources of funding are specified; similarly when a shortage of appropriate open space is expected, as in the Shoreham Harbour, no sources of mitigation are identified.

11.2 Given the expected increases in both the local population and in visitors to Adur, demand for more sports and recreation facilities will continue, the Local Plan needs to identify new provision to come on stream over the next 15 years.

11.3 As population and visitor numbers rise, Green Infrastructure and Adur's biodiversity will be further challenged, its particular geography and river system will come under new pressure; the Local Plan needs to strengthen the importance of 'place' in its policy and demonstrate how design guidance will help to underpin this.

Issue 13: Pollution, Water Quality, Drainage and Flood Risk (policies 35-37)

13.1 The geography and geology of Adur District, its propensity to flooding and drainage problems, to sewage leaking into homes/gardens/roads and being discharged on bathing beaches, re-enforces CPRE's concerns that the Local Plan needs to be more specific on how the key issues of pollution, particularly of air quality, will be addressed. How will flood risk, other than from the River Adur, be managed? We draw your attention to our written evidence in 2014 and in 2016 in relation to flooding. Management of ground water flooding in Sompting needs clarification. The SWMP for New Marks Farm totally fails to demonstrate drainage sustainability to comply with para 102 of the NPPF.

Issue 17: Historic Environment (policy 17)

17.1 Key historic listed buildings include the two churches, St Nicolas in Old Shoreham and St Mary de Haura, the airport terminal (and the WWII Trainer D), and several town centre buildings, there is a need to ensure sight lines across Adur to St Mary's and the historic centre of Shoreham and the integrity of Old Shoreham with St Nicolas church and the wooden bridge across the river. Key views and historical perspectives need to be safeguarded and included in the Plan.

David Johnson

Chair CPRE Sussex.

Tuesday 20th December 2016

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