

ISSUE 5: NEW MONKS FARM, LANCING (POLICY 5)

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

5.1.1 Yes, the Council considers that the requirements of Policy 5 are reasonable, justified, viable and deliverable. The policy requires delivery of a mixed use development which includes employment (approximately 10,000sqm), 600 dwellings (30% affordable to meet identified needs), a primary school, a relocated gypsy and travellers' site, a community hub and a country park. There is a particular focus on sustainable transport, traffic management, flood risk management and green infrastructure issues (landscape and biodiversity enhancements).

5.1.2 The strategic allocation at New Monks Farm (together with Shoreham Airport) are both highlighted in the Local Strategic Statement (See Spatial Priority 1, LSS2 CD03/1):

Local planning authorities will work with their partners to support the development of the strategic employment and housing sites, including Brighton Airport, Shoreham and Shoreham Harbour, identified in the Adur Local Plan by giving priority to the infrastructure improvements needed to enable the sites to be delivered...

...Brighton Airport, Shoreham: Priorities for securing new employment floorspace and job opportunities will include improved road access from the A27, which will also facilitate access to a new strategic mixed use site.

5.1.3 The Draft Adur Place Plan (CD24/9) also recognises the importance of these sites (See Priority 1: Shoreham and Lancing Growth - New Monks Farm and Shoreham Airport).

Housing:

5.1.4 The policy seeks delivery of 600 dwellings, 30% of which are to be affordable (as currently defined). No concerns have been raised by the site promoters at this level of affordable housing (although some concerns have been raised about the tenure split).

5.1.5 Following publication of the Proposed Submission Adur Local Plan 2014 (CD04/1) under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, representations submitted to the Council by the current site promoter proposed changes to the strategic allocation of New Monks Farm in the Plan.

5.1.6 As a result, a specific, targeted regulation 18 consultation exercise was undertaken from the 9th December 2015 to the 4th January 2016 (See CD05/1) which consulted on several proposed changes to the allocation, as follows:

“The proposed changes related to the following:

- 1) The number of dwellings proposed is 600 (rather than 450-600)*
- 2) The indicative location of the proposed roundabout is moved eastwards to a more central location between Shoreham (Brighton City) Airport and the New Monks Farm allocation.*
- 3) The existing Withy Patch Gypsy and Travellers site is relocated westwards (to allow for the revised roundabout location). Relocation also provides an opportunity to improve the site and facilities, address flood risk and enable some limited future expansion to meet identified needs from within Withy Patch.*
- 4) The site allocation boundary is amended, to include the existing Withy Patch site. Including this area within the site boundary will mean that the relocated site and flood risk improvements will be delivered as part of the development at New Monks Farm. 5) The proposed Built Up Area Boundary amendment (between the proposed built up area of New Monks Farm, and the proposed country park) is shown as indicative; the final boundary will be determined at planning application stage based on landscape and drainage assessments”.*

5.1.7 The Council's Statement of Consultation (CD07/10) sets out the background to this additional Regulation 18 consultation exercise, the key issues raised, and the Council's responses to them. The consultation document included the following paragraphs explaining the proposed changes to the Plan:

1) The number of potential homes is stated as 600. Why?

The previous plan gave a range of 450-600 homes, but the higher amount is likely to be required to make the development viable. Adur also has a significant need for new homes.

2) The indicative location of the proposed roundabout is moved eastwards to a more central location between the airport and New Monks Farm site. Why?

The previous version of the plan showed an indicative location for a roundabout onto the A27 at the western end of the allocation, although it also stated that an alternative access (a new roundabout at the Sussex Pad junction) was retained as a contingency. A more central roundabout location now appears achievable, and better serves the needs of both sites, as well as a number of other stakeholders in the area.

3) The existing Withy Patch travellers site is relocated westwards. There is also potential for a limited expansion to meet identified needs from within Withy Patch. Why?

A more centrally-located roundabout will impact on the existing Withy Patch site. Relocation provides an opportunity to improve the site and facilities, address flood risk and enable some limited future expansion to meet identified needs.

4) The site allocation boundary is amended, to include the existing Withy Patch site. Why?

Including this area within the site boundary will mean that the relocated site and flood risk improvements will be delivered as part of the development at New Monks Farm.

5) The proposed Built Up Area Boundary amendment is shown as indicative. Why?

The Built Up Area Boundary shows the boundary between the new built up area (where the housing and employment land will be) and the countryside and Local Green Gap (where the country park will be). At this point in time it is difficult to determine where exactly the best position for this boundary will be, as this will depend on detailed drainage work and landscape evidence, at the planning application stage.

- 5.1.8 Following the consultation several changes were incorporated into Amendments to the Proposed Submission Adur Local Plan (2016) (CD06/1). The Council therefore considers that it has sought to work proactively with the site promoters to facilitate delivery at this important strategic housing and employment site. A key objective has been to secure a joint access strategy meeting the requirements of Highways England, Shoreham Airport and key local stakeholders.

Community Hub:

- 5.1.9 The policy seeks delivery of a community hub, possibly comprising of community meeting space and/or retail units. Proposals set out by the developer suggest this facility could be located in the vicinity of the primary

school, in order to form a focus for community activities. It is considered important that a development of this size makes a contribution to community facilities and that the community is provided with an area to facilitate interaction, with the existing Lancing community as well as between new residents. (See also 5.5 below). This requirements is considered to be consistent with NPPF paragraph 69 which states that the planning system can plan an important role in facilitating social interaction and creating healthy, inclusive communities; and that planning policies should aim to achieve places which promote opportunities for meetings between members of the community. (Please see Council's response to 5.4).

School:

- 5.1.10 The policy also requires delivery of land to accommodate a new primary school to serve the allocations at West Sompting and New Monks Farm. WSCC will ensure through the S106 agreement that the school is delivered in a timely manner to accommodate the need arising. The details including timing of delivery and development contributions would be agreed at the planning application stage of each site, as it will depend on the timing of development, delivery trajectory of the two sites as well as need in the area. (Please see Council's response to 5.4).

Employment Floorspace:

- 5.1.11 The policy seeks the delivery of 10,000sqm employment generating floorspace. The Council's response to Issue 2 states that while New Monks Farm Developments Ltd and Albemarle have argued that the employment floorspace provision figures for New Monks Farm (approximately 10,000sqm) and Shoreham Airport (approximately 15,000sqm) should be minimum figures, this is not considered appropriate given the sensitive location of these two sites in the countryside and the Shoreham-Lancing Local Green Gap. This matter is addressed below, and in response to Issue 6 Shoreham Airport.

- 5.1.12 This sensitivity is also recognised in the Coastal West Sussex and Greater Brighton Local Strategic Statement (LSS2) (CD03/1) which in Spatial Priority 1 (Shoreham Harbour and Brighton Airport, Shoreham) states:

"Brighton Airport, Shoreham: Priorities for securing new employment floorspace and job opportunities will include improved road access from the A27, which will also facilitate access to a new strategic mixed use site. Development potential should take into account the landscape setting and views of the Airport from the River Adur and the South Downs National

Park, biodiversity and heritage assets of the area and the need to protect and preserve the green gap between Lancing and Shoreham”.

New Junction:

- 5.1.13 The policy also requires suitable access onto the A27 in agreement with Highways England. A joint access is proposed, in order to serve both New Monks Farm and the proposed allocation at Shoreham Airport.
- 5.1.14 As explained above, an additional regulation 18 consultation was held 9th December 2015-4th January 2016 (See CD05/1) which consulted on several aspects of the proposed allocation, including moving the indicative location of the proposed roundabout eastwards to a more central location between Shoreham (Brighton City) Airport and the New Monks Farm allocation. (The Proposed Submission Adur Local Plan 2014 (CD04/1) had shown a centrally-located indicative location on the Policies Map (CD04/2)). Representations received in response to that iteration of the plan expressed concerns that access should remain in both directions (Lancing College, rep 9); whilst Ricardo (rep 30) stated that it wanted to see an agreed location for the proposed new junction as far east as possible (see CD/04/4 and CD04/4A).
- 5.1.15 Following the consultation exercise, the ‘Amendments to the Proposed Submission Adur Local Plan (2016) (CD 06/1) showed a revised junction location; an amendment was made to paragraph 2.49 of the Plan which added the following text:
- ‘The preferred site for a proposed roundabout is centrally located between New Monks Farm and Shoreham Airport, with a reconfigured access at Sussex Pad.’*
- 5.1.16 In response a representation was received from Albermarle and Longbow (rep ID 48) seeking reference to a centrally located roundabout; however the recent response received on behalf of Albermarle (REP-048-001) does not refer to this matter and the Council is aware that the New Monks Farm site promoters are negotiating a collaborative agreement with the Airport. Representations were also received in response to the Amendments to the Proposed Submission Adur Local Plan (2016) from Lancing College (ID 9) and Ricardo (ID 30); both parties stated that they had no objections to the amendments made in relation to Policy 5. Both also state that it is important that the LGF bid is supported and that Highways England deliver an upgraded A27.

- 5.1.17 The Council is currently engaged in pre-application discussions with the site promoters for New Monks Farm. A Transport Strategy Sub-Group has been set up for New Monks Farm, comprising the site promoters and representatives of ADC, WSCC and Highways England. These meetings have considered various options for the new junction, albeit Highways England's preferred approach is to ideally secure the closure of the Sussex Pad junction or a redesign to a 'left in, left out' junction.
- 5.1.18 Policy 5 seeks provision of, or funding for mitigation for off-site traffic impacts on the Strategic Road Network; provision of sustainable transport infrastructure and site-specific travel behaviour initiatives - please see below.

Withy Patch.

- 5.1.19 Policy 5 requires the relocation (and expansion) of the existing Withy Patch Gypsy and Travellers site. The Council's response to Issue 3.15 explains that the New Monks Farm allocation will deliver the additional pitch requirement identified in the Gypsy and Traveller Accommodation Assessment (CD09/7).
- 5.1.20 The existing site at Withy Patch is located immediately south of the A27 and previously was adjacent to the proposed strategic allocation at New Monks Farm (Policy 5). However, following consultation (see above), changes were made in the Amendments to the Proposed Submission Adur Local Plan and its accompanying Policies Map (CD06/2) which amended the allocation boundary to include the existing site. This is because delivery of the new road junction (in its revised, more 'central' position) necessitates the relocation of the Withy Patch site. As part of the master planning process the promoters of the New Monks Farm development (New Monks Farm Development Limited) have identified a new location within their site boundary, on which they propose to construct a replacement for the Withy Patch site. This proposed new site will be of sufficient size to allow the relocation of existing Withy Patch residents together with an additional area of land to accommodate the required need for the additional four pitches. (Prior to the construction of the site the land will be raised to take it out of flood zone 3).
- 5.1.21 Adur District Council is working with New Monks Farm Development Limited, West Sussex County Council, the site management company, the Gypsy and Traveller community and their representatives together with other relevant stakeholders to ensure that the identified site is in a suitable location. This is in accordance with Policy G (paragraph 21) of 'Planning policy for travellers sites' (DCLG August 2015) (CD01/18).

- 5.1.22 The proposed new Gypsies and Travellers site will have significant benefits for both the existing and new residents. It will be increased in size to accommodate the need for an additional four pitches (therefore meeting all the need for Gypsies and Travellers identified in the GTAA); be connected to the mains drainage, water and electricity services; benefit from the new flood defences, have improved ground water drainage strategy and be higher than predicted flood levels in the area, and have access to new local playgrounds via safe footpaths. New Monks Farm Development Limited intends to construct the site in the first phase of the wider scheme, commencing in November 2017. (Rep 20-38-001 paragraph 5.9).
- 5.1.23 The policy sets out requirements in relation to addressing various forms of flooding. These are discussed in more detail below.
- 5.1.24 The policy seeks a Landscape Strategy/ Green Infrastructure Strategy for the site. This is of particular importance given the landscape constraints, which are discussed below. The policy seeks children's play areas and open space within the development (see below). In addition, it seeks delivery of a country park. This park was initially proposed by the previous site owner/promoter in response to landscape concerns about development extending east of Mash Barn Lane. The park offers multiple benefits notably securing a landscape buffer between the built elements of the site and the Airport - within the context of the Local Green Gap. (It is therefore important that it reflects its 'countryside' location in terms of design, with no lighting, no built facilities, and is consistent with Policies 13: Adu's Countryside and Coast and 14: Local Green Gaps). The new country park will also create public access to the gap, and provide an additional informal recreation facility for the area. It is therefore important that it is designed and laid out in such a way that these benefits are achieved.
- 5.1.25 A discussion of the requirement for strategically sited woodland can be found in the Council's response to Issue 4: West Sompting (4.2)

Viability

- 5.1.26 It is acknowledged that the site has notable infrastructure costs, particularly given the new junction. (Paragraph 5.5 of DMH Stallard response (ref) lists 'related infrastructure investment' although this list appears to include some normal development costs, such as the cost of purchase of the land; provision of services and design/ legal fees, etc.).
- 5.1.27 ADC has sought to clarify these infrastructure costs. A financial appraisal has been submitted by NMF Developments and the Council has sought to

have these costs verified by appointing Cost Consultants. Whilst it was not possible to come to agreement regarding precise costs at this stage, it was identified that there would be significant infrastructure costs and that there was likely to be a funding gap particularly if the New Monks Farm development was meeting all the costs for the provision of the new roundabout.

5.1.28 As mentioned above, due to the high infrastructure costs involved, particularly with the new junction on the A27, a bid for Local Growth Funding was submitted to Government, supported by the LEP, to help deliver these two key sites. The sites are important in the sub-regional area (see LSS2 (CD03/1) and Draft Adur Place Plan (CD24/9) as referred to above). The bid (submitted in April 2016) states that LGF funding will be used specifically for the provision of the essential road infrastructure to unlock the development of these sites. Without the new junction only a maximum of 250 dwellings can be delivered due to access constraints - see 5.4 below).

5.1.29 The Adur Whole Plan Viability and CIL Study 2016 (CD 24/11) has undertaken some viability assessment, although it should be noted that this is a high level assessment. The report indicates that the New Monks Farm site:

'Is broadly deliverable based on delivery of 600 dwellings taking into account of full plan policy impacts. However, the very significant level of abnormal site development costs at over £20 million, reduce viability to a marginal negative level at - £4.5 million (against an overall development value of 150 million). It is considered this would enable affordable housing and s106 Infrastructure Contributions to be delivered but there is insufficient additional margin to accommodate any significant residential CIL charges'

5.1.30 The Adur WPV and CIL study also assessed the viability of employment development and concluded that, whilst the generic appraisals showed that general employment development is not viable this does not mean that it is not deliverable as a full developer's profit allowance was included, whereas in reality many employment schemes are built out by the proposed occupiers. The report therefore indicates that without this profit allowance then employment development would be viable and deliverable.

Layout/ Form/ Boundaries of the Allocation

5.1.31 The landscape work undertaken by Sheils Flynn (Landscape and Ecological Surveys of Key Sites within the Adur District 2012) (CD14/2) has

established indicative development principles which have influenced the layout and form of the development (See ADC Local Green Gap Topic Paper (CD07/14), chapter 6 'Local Green Gaps and the Strategic Allocations', and paragraphs 2.47 and 2.48 of the Submission Adur Local Plan 2016 (CD07/1)).

- 5.1.32 The baseline ecological assessment undertaken for the site indicates the importance of the wet woodland, floodplain meadow and wetlands to the north west of the site and the network of streams and ditches that connect these wetlands to the wider floodplain tributaries of the River Adur between Lancing and Shoreham Airport. The landscape and visual assessments demonstrate that the northern part of the site is generally less visible than other parts of the Lancing-Shoreham Local Green Gap in views from the high sensitivity viewpoints within the South Downs National Park and so this part of the site is most suitable for the location of the larger buildings associated with employment uses. However, there is a balance to be struck between delivering mixed use development to meet local needs and conserving the open, undeveloped character of the Local Green Gap between Lancing and Shoreham-by-Sea. The majority of the area within the New Monks Farm site boundary that is shown as countryside on the Policies Map (CD) (Map 2 of the Submission Adur Local Plan 2016 (CD07/1)) will be developed as a country park, safeguarding the open character of the Local Green Gap, preventing coalescence and enhancing the character and accessibility of the landscape which forms the distinctive landscape setting for both Lancing and Shoreham-by-Sea.
- 5.1.33 The site-wide landscape and ecological management plan referred to in the policy will ensure that existing and newly created habitats within the New Monks Farm development are managed long-term. On this site the requirement for management of wetland habitats is also necessary to deliver ongoing flood risk management so high quality wetland/riparian habitat management is assured.
- 5.1.34 DMH Stallard's response on behalf of New Monks Farm Development Ltd (REP20-38-001) states that the viability and commercial deliverability of the allocated New Monks Farm development depends on the support of LGF funding and an extension of the Built Up Area Boundary (BUAB). The plans in Appendix 3 to the representation show the current masterplan for development at New Monks Farm overlaid with the Built Up Area Boundary; they show that part of the commercial development and small parts of the residential areas on the eastern fringes of the proposed development are outside the Built Up Area Boundary as set out in the Local Plan.

- 5.1.35 The BUAB separating the proposed areas of built development and country park within the New Monks Farm strategic allocation is shown as an indicative boundary on the Policies Map within the Submitted Adur Local Plan (CD07/1). It does not follow any specific landscape features 'on the ground' but its location has been influenced by the development of evidence on potential landscape and visual effects (Landscape Sensitivity for the Adur Local Plan Area) (CD14/10) and on the analysis of landscape setting and the risk of coalescence (Adur Landscape Study Update) (CD14/9).
- 5.1.36 In this part of the Lancing-Shoreham Gap, a key influence is the area that is visible in the highly sensitive elevated views from the open access land at Lancing Ring and from Hoe Court in the South Downs National Park. Viewpoints 8 and 9 in the Landscape Sensitivity Assessment (CD14/10) provide representative views from these locations. It shows that the area of housing that falls outside the Built Up Area Boundary on the New Monks Farm masterplan is within the area that is visible from Hoe Court and also from some parts of the Lancing Ring open access land. These same areas are also visible in longer distance views from the Mill Hill Nature Reserve and the Adur riverside paths. It should be noted that the photograph from Lancing Ring provided in the Appendix 3 of DMH Stallard's representation is from the public right of way alongside the open access land and does not provide as clear a view of the site as can be obtained from the elevated areas of the open access land to the west of the car park.
- 5.1.37 In showing the BUAB as an indicative line within the New Monks Farm allocation, the Council recognises that there is a balance to be struck between development viability and development which causes unacceptable detrimental impacts on landscape character and landscape setting. The analysis of the Lancing-Shoreham Local Green Gap landscape (Figure 8) in the Adur Landscape Study Update (CD14/9) demonstrates that all the area east of Mash Barn Lane contributes to the distinctive landscape settings of both Lancing and Shoreham and it follows that any development within this area carries the risk of increasing the perceived coalescence of these two settlements. As a result the Council considers that it has already taken a flexible attitude with regards to the BUAB.
- 5.1.38 It should be noted that the BUAB to the east of the Brighton and Hove Albion Football Academy site is not shown as indicative on the Adur Local Plan Policies Map (CD06/2) and that the Council considers that land to the east of this facility should be part of the new country park.

5.2 How will the Suggested Phasing be secured?

5.2.1 DMH Stallard's response on behalf of New Monks Farm Developments Ltd (REP20-38-001) sets out the proposed phasing of the development. This demonstrates the ability to achieve access for 250 dwellings prior to the new junction on the A27 becoming operational (see below); early works to address flood, drainage and infrastructure, and construction of the new location for the relocated Withy Patch travellers site.

5.2.2 The exact details will be secured through the use of section 106/ section 278 agreements (as appropriate) to the planning permission.

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 para 100) been followed?

5.3.1 The Adur Local Plan has been supported by a Strategic Flood Risk Assessment (SFRA) (JBA, 2012) (CD15/1) as per para 100 of the NPPF and the SFRA has informed the assessment of all potential development sites in the district. The SFRA includes both Level 1 and, where necessary, Level 2 assessments. The Level 2 assessment in the Adur & Worthing SFRA assesses the following:

- Fluvial flood risk (undefended)
- Tidal flood risk (undefended)
- Actual fluvial flood risk (with defences)
- Actual tidal Flood Risk (with defences)
- Future fluvial flood risk with defences for 2056 and 2106 (taking account of climate change predictions)
- Future tidal flood risk with defences for 2056, 2070, 2106 and 2115 (taking account of climate change predictions)
- Residual Tidal Flood Risk Wave Overtopping
- Surface Water Flood Risk (Flood Map for Surface Water 1 in 30 year and 1 in 200 year)
- Areas susceptible to groundwater flooding

5.3.2 Additionally, as part of the Shoreham Harbour Regeneration Design and Flood Risk Study (JBA, 2011) (CD13/12), a number of other tidal flood risk maps were produced for the Shoreham and Lancing area showing:

- Flood Hazard
- Flood Depth
- Flood Onset
- Flood Velocity

- 5.3.3 Because these maps were produced for the Shoreham Harbour study which was undertaken prior to the SFRA, they were not reproduced in the SFRA. However, these maps have been added to the SFRA appendices on the Council's website (<https://www.adur-worthing.gov.uk/planning-policy/adur-and-worthing-background-studies-and-info/flood-risk/#sfra>) given their relevance to the SFRA.
- 5.3.4 All of the information required as part of the Level 2 assessment, as set out in Para. 12 of the NPPG, is included in the SFRA or as part of the Shoreham Harbour Design and Flood Risk Study.
- 5.3.5 The SFRA has also informed the Council's Sequential and Exception Test (CD 06/10) which is a key document used to steer new development to areas with the lowest probability of flooding and address flood risk on specific sites, demonstrating that development provides wider sustainability benefits to the community that outweigh flood risk, and that development will be safe for its lifetime without increasing flood risk elsewhere. The Sequential and Exception Test has been carried out in accordance with paras 101-102 of the NPPF.
- 5.3.6 As shown in the SFRA, the Sequential and Exception Test and the Flood Risk Topic Paper (CD07/15), New Monks Farm is predominantly within flood zone 3a with parts of the site in flood zone 1 and 2. However, due to the limited amount of sites in the district to meet housing needs, it is not possible to direct all development to flood zones 1 and 2 and, as a result, New Monks Farm passes the Sequential Test. Because residential uses are proposed as well as a school, both of which have the flood vulnerability classification 'More Vulnerable', the Exception Test is required.
- 5.3.7 As can be seen from the Sequential and Exception Test document (CD06/10), New Monks Farm passes Part 1 of the Exception Test as it generally scores positively in relation to the Sustainability Objectives and provides wider sustainability benefits that outweigh flood risk.
- 5.3.8 With regard to Part 2 of the Exception Test, a table has been produced for New Monks Farm setting out the type of flood risk on site, the specific flood risk issues, the recommended mitigation to deal with this issue and the outcome of this mitigation. This table has been informed by a number of documents:
- Adur & Worthing Strategic Flood Risk Assessment (2012) (CD15/1)
 - New Monks Farm Interpretative Hydrogeological Report on Groundwater Levels and Influencing Factors (2014) (CD15/6)

- Lancing Surface Water Management Plan (2015) (CD15/3)
- 5.3.9 The Exception Test recognises however, that, due to some of the complications around drainage of the site and the interactions between groundwater and surface water, a significant amount of further work will be required for the site specific Flood Risk Assessment at the detailed design stage. Nevertheless, the Exception Test goes as far as is currently practicable to show the type of mitigation required to ensure that the development will be safe for its lifetime without increasing flood risk elsewhere and, where possible, reducing flood risk overall.
- 5.3.10 Adur District Council have been working with the Environment Agency, West Sussex County Council and New Monks Farm Developments Ltd to achieve an acceptable drainage solution on the site through a continuing series of meetings.
- 5.3.11 It is also important to note that the approach to flood risk in the Adur Local Plan has been accepted by the Environment Agency and no objections to the approach were raised by West Sussex County Council as the Lead Local Flood Authority. A draft Memorandum of Understanding (MoU) has been produced and it is anticipated that this will be signed by all three parties by the time of the Examination.
- 5.4 What assessment has been undertaken regarding the impact of the proposed development on existing infrastructure, for example roads, schools, community facilities (including sports pitches), health services and utilities? How will it be decided what is an ‘appropriate stage of development’ with regard to the provision of a new A27 access? (last bullet point).**

Roads and ‘appropriate stage of development’ re new A27 access provision

- 5.4.1 The Adur Local Plan and Shoreham Harbour Transport Study - Second Addendum Revised Reissue (CD12/3) is the most up-to-date transport evidence base supporting the Adur District Local Plan and the Shoreham Harbour Joint Area Action Plan. It considers the transport impacts of strategic residential and commercial site allocations within Adur and Brighton and Hove in 2031; revised access arrangements for the West Sompting site; collision and safety hotspot identification and mitigation; and highway improvements at key junctions. This evidence indicates that proposals within the Adur Local Plan, including the development of New Monks Farm, Lancing (policy 5) can be achieved satisfactorily with the mitigation measures proposed across the plan area, and other planned changes (such as the Highways England improvement scheme for the

A27). The access junction for New Monks Farm and Shoreham Airport is not specifically modelled in the study. Work is being undertaken by the site promoters to assess their junction design with Local Plan policy flows. The precise design of the junction is not yet agreed with Highways England and discussions continue on how it can be modified to meet Highway England's criteria and aspirations, including the need to ensure appropriate and safe pedestrian, cyclist and equestrian access across the A27.

- 5.4.2 The transport evidence base has been based on the use of the Shoreham Harbour / CTS transport model. The model has a base year of 2008, and work has been ongoing throughout plan preparation to explore and test alternative spatial strategy options. It is acknowledged that the base date of the model is now older than is desirable. For this reason the County Council has provided guidance on interpretation of the model's outputs and assurance that the forecasts are robust (CD12/8). The County Council has compared the observed traffic growth on major roads within Adur District between 2008 and 2015 with the model's forecast and found that the trends agreed. In fact, the model predicted higher growth in most cases than that which was actually observed and then extrapolated to the forecast year. The exception was considered to be attributable to the forecast flows being restrained by the capacity of the A27/A2025 Lancing Manor roundabout. These results give some assurance that the forecasts are robust.
- 5.4.3 It is worth noting that work continues to take place on traffic analysis and management. For example, West Sussex County Council is now leading on formally commissioning WSP-Parsons Brinckerhoff to undertake the Shoreham Area Sustainable Transport Package Study. The draft brief for the study is currently being developed, and will require an options appraisal and feasibility study to identify a package of feasible transport improvements in the Adur area which can be delivered to support development around the area.
- 5.4.4 Policy 5 has a range of transport and improved access elements including:
- 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 Lancing, Shoreham-by-Sea and the South Downs National Park.

- Site-specific travel behaviour initiatives which encourage the use of sustainable modes of transport. (This should include a package of travel behaviour initiatives such as residential and workplace travel plans).
- Improved access across the A27 to the South Downs National Park for pedestrians, cyclists and equestrians must be provided.
- Development will be phased in order to:
 - Ensure that Withy Patch Gypsy and Travellers site is relocated prior to the construction of the new roundabout access onto the A27
 - Ensure the delivery of a new A27 access at an appropriate stage of development

5.4.5 The appropriate stage of development for the provision of the new roundabout access onto the A27 will be:

- After the relocation of the Withy Patch Gypsy and Travellers site.
- Before the development of more than 250 dwellings on the New Monks Farm site; this is to avoid adverse impacts on the existing residential area. Up to 250 dwellings can be built (and occupied) prior to the new roundabout because Grinstead Lane can provide access up to that threshold. Once this threshold is met (or in advance of it), the roundabout must be constructed and opened. Once the roundabout is built access from the site onto Grinstead Lane will be restricted to buses and emergency vehicles only (see paragraph 2.51 of the Adur Local Plan).

5.4.6 Further to the advice from WSCC, a change was made to paragraph 2.51 of the Amendments to the Proposed Submission Adur Local Plan (2016) to make it clear that the amount of development delivered prior to the new junction becoming operational would need to be restricted to a maximum of 250 dwellings in order to avoid adverse impacts on the existing Mash Barn estate. (Please see report submitted to support New Monks Farm proposals (CD12/9) and response from West Sussex County Council (CD12/10))

5.4.7 The funding sources and cost apportionment of transport infrastructure can be seen in Section C - Implementation Plan of the Infrastructure Delivery Plan (CD07-19). Improvements that will benefit transport management at New Monks Farm, Lancing, and which require developer contributions include:

| Improvements | Developer contributions and other funding |
|----------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| A27/A283 Steyning Road junction | West Sompting £ 71,200 New Monks Farm £ 111,100 Shoreham Harbour Western Arm £ 359,300 |
| A259 Brighton Road / A2025 South Street junction | New Monks Farm £ 106,700 Shoreham Airport £ 87,000 Shoreham Harbour Western Arm £ 73,000 |
| New access on A27 at Lancing | LEP funding Not yet determined Highways England Not yet determined New Monks Farm Not yet determined Shoreham Airport Not yet determined Total approx <u>£10,850,000</u> |
| A27 Old Shoreham Road / A2025 Grinstead Lane junction | West Sompting £ 275,000 New Monks Farm £ 427,800 Shoreham Airport £ 176,000 |
| A27 Sompting Bypass / Upper Brighton Road junction | West Sompting £ 14,000 New Monks Farm £ 14,400 Shoreham Airport £ 10,800 |
| Package of site specific travel behaviour initiatives | New Monks Farm £ 114,850 |
| Public transport - improvements to existing bus services | New Monks Farm £ 1,211,000 |
| Improved cycle and pedestrian links | New Monks Farm £ 38,000 |

- 5.4.8 These measures will be delivered either through s278 agreement or through developer contributions via s106 agreements, to be agreed with WSCC and/or Highways England as relevant.
- 5.4.9 Specific development proposals will be considered in detail at the application stage. A transport assessment will be required as part of the application to develop New Monks Farm, Lancing (see paragraph 2.52 of the Adur Local Plan), and the views of stakeholders (such as WSCC and Highways England) are sought again. This will ensure that the development manages traffic impacts appropriately.
- 5.4.10 New Monks Farm will require improved public transport provision. Bus services / access arrangements for buses will need to be considered in relation to strategic sites being allocated in the Local Plan.
- 5.4.11 Representations on behalf of New Monks Farm Developments Ltd raised concerns over the references to CIL/S106 to secure infrastructure improvements. In response to this the Council has proposed a major modification to reorganise references to infrastructure provision (MM19).

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)?

- 5.5.1 A range of assessments have been carried out to consider the impact of the proposed development on existing infrastructure, as follows:

Schools

- 5.5.2 WSCC is the Local Education Authority (LEA) for West Sussex. With regards to primary education, the County Council has a statutory duty to ensure that there is sufficient appropriate primary education provision available across West Sussex. Currently the schools have sufficient capacity to cater for the number of pupils in the locality. The continuing increase in the demand for starting school places will require expansion at one or more of the primary schools within the locality in the next 5 years. The proposed strategic housing allocations require the provision of additional school places as set out in the IDP and below.
- 5.5.3 The '*Planning School Places, 2016*' document (CD 24/13) outlines the planned provision for Adur and identifies the need for extensions to existing schools and new schools throughout the District. It states '*The housing developments proposed in the local plan at Lancing including New Monks*

Farm & the West Sompting will bring forward a requirement for a site for a 1FE (210 place) expandable to 2FE (420 place) primary school. The development at Shoreham Harbour, whilst intended to mainly consist of flatted accommodation will still bring forward the need for a 1FE (210 place) primary school to be sited within the development or if this is not possible within a reasonable distance from the development to enable pupils to walk to school, thus encouraging sustainable travel. Discussions are on-going with Adur District Council as to how this can best be accommodated in the area.'

- 5.5.4 With respect to secondary education, secondary schools in the Shoreham area are currently running at over the desired 95% capacity; as a result contributions are sought towards the delivery of expansion to a school of 0.5 FE. It is recognised that a half form entry would not occur in practice, so further funding would be required to bring this forward as a 1FE expansion; developments however should contribute to delivery of expanded buildings to accommodate their needs.
- 5.5.5 Ensuring residents have access to appropriate training / educational facilities is important for tackling low skills levels and educational deprivation. Providing and protecting employment floorspace increases the opportunities for business to locate in Adur and offer apprenticeships which may require upskilling through FE courses.
- 5.5.6 Early Years provision - The Childcare Act 2006 identifies the vital role local authorities play as strategic leaders in facilitating the childcare market: Section 6 of the Act sets out that the Local Authority (in this instance WSCC), so far as is reasonably practicable, should ensure that the provision of childcare is sufficient to meet the requirements of parents in their area. This is to enable them to work or undertake education or training which could reasonably be expected to assist them to obtain work.
- 5.5.7 The children and family centres in Adur are run by WSCC and have childcare provision on site. Their main function is to provide support, activities and the facilities for children and families. Most childcare provision in Adur is delivered through private businesses or through on-site nursery care provided by primary schools. The WSCC Childcare Sufficiency Report identifies that there are currently vacancies for all forms of childcare provision within Adur. The Report identifies the need to improve quality across the area and to sustain the current childcare supply.
- 5.5.8 Before the additional 15 hours a week was brought forward, the proposed housing and employer developments are likely to generate a need for an

additional 100 childcare places which would be delivered by private, voluntary and independent childcare providers.

- 5.5.9 If a new primary school is to be delivered at the New Monks Farm site, an additional classroom (30 places) for use by pre-school and out of school use should be provided to cater for the increase in demand in the area.
- 5.5.10 The other developments are likely to generate a need for a further 70 childcare places with approximately one-third in the Sompting area and two-thirds in the Shoreham Harbour area. These would be ideally met through the use of multi-purpose community buildings or provision at new and / or existing primary schools. Further consideration as to the impact the further 15 hours free childcare will have on services will be needed in due course.
- 5.5.11 A summary of the education provision set out in the Infrastructure Delivery Plan (CD07-19) is shown in the extract below.

| Physical Infrastructure | Developer contributions | |
|-------------------------------------------------------------------------|--------------------------------|----------|
| Provision of 30 new places for early years education | New Monks Farm 402,480 | £ |
| New 1 form entry primary school with the possibility to expand to 2 FE* | New Monks Farm 3.36m | £ 3.02 - |
| | West Sompting 2.64m | £ 2.38 - |

★ Please note this figure is likely to be revised in due course once WSCC agree a new methodology.

- 5.5.12 Policy 5 requires the provision of 1 hectare of land to accommodate a 1-form entry primary school, with additional land for expansion to 2-form entry in the future. The site promoter has agreed to provide a site for this; DMH Stallard's response (REP20-38-001) on behalf of New Monks Farm Developments Ltd states (paragraph 5.18):

“Given the scale of the proposed development, it contains plans to provide a one form entry primary school on 2.044 hectares of the site...The development proposals provide space for the school to be expanded to a two-form entry in the future, in line with Local Plan requirements.”

- 5.5.13 S106 contributions from the West Sompting development will also be utilised to facilitate delivery of this school. (See Council's response to Issue

4). Through section 106 agreements, WSCC will ensure that the school is delivered in a timely manner to accommodate the need. The details, including timing of delivery and contributions will be agreed at the planning application stage of each site, as it will depend on the timing of development, the delivery trajectories of the two sites, as well as need in the area.

Community facilities (including sports pitches)

- 5.5.14 Existing libraries in Adur are located at Lancing, Shoreham and Southwick, and a mobile library service is also in operation in Adur. The current provision meets the needs of existing residents. The proposed strategic housing allocations are likely to create additional demand for library provision as set out in the IDP and below.
- 5.5.15 Improvements will be required to the public areas at the Lancing library, to cope with increasing/changing demand by the local community. As identified in Policy 11 of the Local Plan, a potential new library is to be provided as part of the mixed use redevelopment of existing community facilities at Pond Road is being discussed with other partners and landowners. Funding sources include WSCC capital funds and developer contributions.
- 5.5.16 WSCC is continuing to explore opportunities for shared provision and use of buildings, expanding the virtual offer, the provision of unstaffed collections with self-service terminals and a reassessment of the effectiveness of current library locations. In general this will mean a much more flexible approach to providing access to the Library Service. The requirement for infrastructure to support additional developments will need to be equally flexible and creative.
- 5.5.17 Policy 30 (Open Space, Recreation and Leisure) states that major development for residential use will be required to provide open space on site in accordance with the Council's adopted standards (See Adur Planning Contributions for Infrastructure Provision Interim Planning Guidance, July 2013 (CD24/12)). The type of space to be provided is determined by the scale and type of development and the needs of the area and is set out in the IDP (CD07-19). At New Monks Farm a country park with informal recreation of approximately 28 ha will be created, a LEAP (or equivalent) and 4 new allotment plots at the existing Lancing Manor site. Information from the IDP is presented in the table below for information.

5.5.18 With regard to community pitches, the Adur Playing Pitches Strategy 2014 (CD20/4) noted a requirement for four youth pitches. Since that study a 3G pitch has been provided at Brighton and Hove Football Academy in Lancing adjacent to New Monks Farm, and another pitch is to be provided at the Sir Robert Woodard Academy, Lancing. The IDP therefore makes provision for the remaining 2 youth pitches and associated changing facilities that are needed. These will be provided as part of the development at West Sompting which is considered the best location (see IDP CD07-19).

5.5.19 A need has been identified for some form of multipurpose flexible space that could be used by the community as a focal point (development proposals include provision for a 250sqm facility - see DMH Stallard response on behalf of New Monks Farm Developments Ltd (REP20-38-001 para 5.22). This could be linked to a small business such as café or retail unit. This infrastructure requirement is referred to as a “community hub” in the Infrastructure Delivery Plan (CD07-19) - see relevant information extracted in the table below.

| Physical Infrastructure | Developer contributions |
|---------------------------------------------------------------------|----------------------------------|
| Improvements to library service provision in the area | New Monks Farm 177,303 £ |
| Provision of a community hub | New Monks Farm 450,000 £ |
| Provision of one LEAP (or equivalent) | New Monks Farm 100,000 £ |
| Creation of a country park with informal recreation | New Monks Farm 2,458,584 £ |
| Provision of 4 new allotment plots (at existing Lancing Manor site) | New Monks Farm unknown £ |

5.5.20 Other contributions, including improvements to fire and rescue services will be required; this contribution will be estimated following the review of the West Sussex Fire and Rescue Service service review.

Health services

5.5.21 The IDP (CD07-19) notes that some of the existing accommodation for health services is in need of modernisation and repair or extension. Financial contributions have been identified by NHS Property Services towards improved facilities to accommodate growth identified in the Local

Plan. The New Monks Farm development will contribute to the improvement and extension/expansion of Lancing Health Centre at Penstone Park, and dental facilities. Relevant information from the IDP is set out below for information.

| Physical Infrastructure | Developer contributions | |
|--------------------------------------------------------------------|--------------------------------|---|
| Extension / improvements to Lancing Health Centre at Penstone Park | New Monks Farm | £ |
| | 272,000 | |
| | NHS Capital Budget | £ |
| | 228,000 | |
| Improved / expanded dentist facilities | New Monks Farm | £ |
| | 5,000 | |

Utilities

5.5.22 As stated in the IDP (CD07-19) Southern Water is the statutory water and sewerage undertaker in Adur District and has a duty to serve new development. It has a rolling programme of investment plans to meet demand. Ofwat (the water industry's economic regulator) expects local infrastructure that specifically serves new development to be funded by the development. The relevant infrastructure to support the development of New Monks Farm, as given in the IDP, is set out below for information.

| Physical Infrastructure | Developer contributions | |
|-------------------------------------------------------|--------------------------------|---|
| Water Distribution System - network capacity upgrades | New Monks Farm | £ |
| | 621,695 | |
| Wastewater Sewerage System | New Monks Farm | |
| | £3,295,971 | |
| SuDS scheme and local drainage improvements | New Monks Farm | |
| | £1,499,472 | |

5.5.23 As stated in the IDP (CD07-19), Scotia Gas Networks (SGN) operates the gas networks in Adur (under the company name of Southern Gas Networks) and was consulted as part of the Local Plan process. Connection to the gas network would be the responsibility of the developer. New Monks Farm and Shoreham Airport will need to deliver reinforcement works to the network which both developments would then use. As this is considered a normal part of development costs the amount has not been determined or specified in the IDP.

5.5.24 Telecommunications and digital connectivity is not considered to be a significant issue for the Local Plan. As stated in the IDP, service providers will fund the majority of improvements in Adur and no further public funding has been allocated to increase access to Next-Generation Access (NGA) superfast broadband services. However, areas without access remain eligible for funding in the event that new funding is made available. New Monks Farm is one such area as its postcode falls within the West Sussex Better Connected project area where the coverage is currently below 90% of the postcode area.

5.6 **Would any element of the proposed development have a detrimental impact on the setting of the WWII Trainer Dome Scheduled Monument?**

5.6.1 In 2016, the Brighton City Airport (Shoreham) Heritage Assessment (CD22/1) was produced to assess the impact of proposed development at, and adjacent to, Shoreham Airport on its heritage value. With regard to New Monks Farm, the only part of the development assessed as having a potential impact on the Trainer Dome is the proposed roundabout on the A27. The study notes that:

*'the new roundabout, lighting, fencing, service road and volume of moving traffic would have a major impact on this aspect of the setting of the dome before mitigation. At present the road is quite well screened by vegetation which also provides the immediate setting for the dome. It is a static landscape with glimpses of moving traffic. Following the development, the dome would be effectively surrounded by moving traffic and the eye would be constantly drawn away from it. The roundabout and perhaps the service road would have intrusive lighting columns and an intrusive security fence may also be required. The fortuitous prominence is of medium historical significance, so that there would be a **moderate/large** effect. The scope for mitigation is discussed in 11.7 and it may be possible to reduce the impact to moderate, so that the net effect would be moderate.'*

5.6.2 The study then goes on to suggest some compensatory measures that could be implemented as part of the development to improve the appearance of the Dome. It states that:

'the helicopter landing area either side of the new east road would presumably be redundant. The ground level could therefore be lowered to the pre-2001 surface. This would remove the 'moat' around the dome. The building and the surrounding land could be allowed to dry out. The paint, probably dating from the 1990s could be removed, allowing further drying out and replacement with an authentic surface. If it is separated from the

flying field it will be accessible to visitors, or even available for a commercial use such as it once had. If the east road could be realigned so that the north hangar is also outside the airfield this could also be conserved by adaptation to a new use.'

5.6.3 In very general terms, the suggested mitigation to minimise the impact of the roundabout on the Dome Trainer includes creating a bund or false cutting and dense planting which would be in character with the vegetation on the north side of the A27 and the sections to the east and west. It also considers that there is scope for ensuring the least intrusive locations and designs for lighting and signage.

5.6.4 Therefore, although the study recognises that the roundabout associated with the New Monks Farm and Airport allocations could have a moderate/large effect on the Dome, there is scope to reduce this impact through mitigation and compensation measures. In line with para 132 and 133 of the NPPF, the study considers the level of harm that the New Monks Farm and Shoreham Airport development would have on the Dome Trainer and concludes that neither development would cause substantial harm.

5.6.5 DMH Stallard's response on behalf of New Monks Farm Developments Ltd (REP 20-38-001) states:

'...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.' (para 5.31).

'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.' (para 5.32).

(See also DMH Stallard response on behalf of Albermarle, REP 048-001 paras 3.11-3.14).

Therefore, while it is recognized that the proposed new roundabout would have an impact on the Scheduled Monument, it is not considered that the impact would be unacceptable, particularly if adequate mitigation/compensation is put in place.

5.6.6 It is noted that Historic England (reference 52 rep 46 see CD06/6) are maintaining their objection with regard to the impact of the proposed roundabout on the Trainer Dome by virtue of its positioning and service

road. The site promoters are currently in discussion with Historic England regarding this matter.

5.6.7 It should also be noted that the impact of the roundabout on the Scheduled Monument is not an issue that has been raised by the Heritage section of West Sussex County Council.

5.7 Does the Council have a fall-back position if the development does not come forward as anticipated?

5.7.1 Please see Council's responses to 18.1 and 18.2.