



**ADUR DISTRICT
COUNCIL**

**Planning Committee
18 July 2018
Agenda Item 5
Ward: ALL**

Key Decision: Yes / No

Report by the Director for Economy

Planning Applications

1

Application Number: AWDM/0961/17

**Recommendation – Approve
subject to referral to the
Secretary of State and the
completion of a S106 legal
agreement**

**Site: Land East Of Shadwells Road At Mash Barn Estate, Mash
Barn Lane, Lancing**

**Proposal: Hybrid planning application seeking (1) Full planning
permission for the demolition of existing buildings and
erection of 249 dwellings with temporary access via
Grinstead Lane, a Country Park, relocation and extension of
the Withy Patch Gypsy and Traveller site, permanent access
via a new roundabout on the A27, landscaping, and other
associated infrastructure (including pumping facility at the
River Adur); (2) Outline planning permission (with only
landscaping reserved) for a non-food retail store (Use Class
A1); and (3) Outline planning permission (with all matters
reserved other than access) for the erection of a further 351
dwellings, community hub, primary school, and landscaping.
The application is accompanied by an Environmental Impact
Assessment.**

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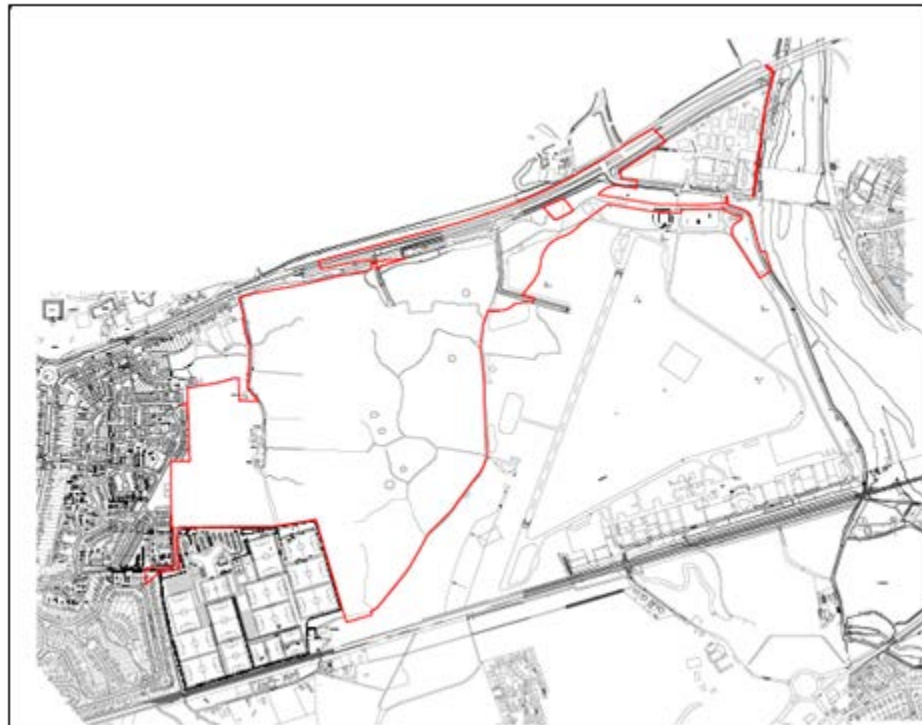
Site: Land West Of New Monks Farm, Mash Barn Lane, Lancing

Proposal: Hybrid planning application seeking (1) Full planning permission for the demolition of existing buildings and erection of 249 dwellings with temporary access via Grinstead Lane, a Country Park, relocation and extension of the Withy Patch Gypsy and Traveller site, permanent access via a new roundabout on the A27, landscaping, and other associated infrastructure (including pumping facility at the River Adur); (2) Outline planning permission (with only landscaping reserved) for a non-food retail store (Use Class A1); and (3) Outline planning permission (with all matters reserved other than access) for the erection of a further 351 dwellings, community hub, primary school, and landscaping. The application is accompanied by an Environmental Impact Assessment.

Applicants: Mr Martin Perry & Mr Ian Humble -
New Monks Farm Development Ltd/
CALA Homes

Ward: Mash Barn

Case Officer: James Appleton



Not to Scale

1. Executive Summary

- 1.1 This is one of the most controversial planning applications the Planning Committee has had to determine. The strategic allocation of New Monks Farm for 600 dwellings and 10,000 sqm of employment floorspace was the most controversial site considered during the Local Plan process given its location within a previously defined strategic gap between Lancing and Shoreham and the history of flooding in the locality.
- 1.2 The current proposal, incorporating a large out of town retail store over three times the amount of commercial floorspace envisaged in the Plan, has understandably heightened the public's anxiety, particularly as the application coincided with Highways England's consultation on proposed 'improvements' to the A27. The lack of certainty about whether the A27 improvements will be undertaken or not has not helped the situation.
- 1.3 Nevertheless, as Members are aware, the Council has a duty to determine the planning application as submitted, having regard to all material planning considerations. In essence the applicant's case is quite straightforward, to unlock the housing land allocated in the recently adopted Plan a non-food retail store (IKEA) of the size proposed is necessary to pay for the significant infrastructure costs and contributions necessary to mitigate the impact of the development on the local community. It is also submitted that the development would help to bring forward development at the airport by delivering a joint access and drainage solution to serve both sites.
- 1.4 The applicant considers that the proposed development complies with the relevant adopted policies for the site (Policy 4 and 5) in providing at least 10,000 sqm of employment generating floorspace and 600 dwellings. In particular, the applicant states that the *'provision of 31,099 sqm of floorspace by a hugely successful international company would clearly have significant economic and employment benefits, whilst crucially ensuring early delivery and viability of the mixed-use allocation set out by Policy 5'*.
- 1.5 The applicants have worked closely with statutory consultees to seek agreement on all technical matters relating to transport, drainage, air quality and noise as well as ecological impacts on the Site of Special Scientific Interest (SSSI). The report identifies the significant economic, housing and employment benefits of the scheme but also recognises that the development would have an impact on the setting of the National Park, The Local Green Gap and heritage assets even with the mitigation measures secured. The adopted Local Plan Policy provides some flexibility with regard to the built-up area boundary and the amount of development but only subject to safeguards to the sensitive landscape between Lancing and Shoreham.
- 1.6 The extent of commercial floorspace proposed and the impact on the size of the Country Park conflicts with aspects of the recently adopted Local Plan. However,

the overall benefits of delivering much needed homes and jobs are material planning considerations which could justify a departure to policy so long as the development was able to satisfactorily address other policy objectives and mitigate the harm to the setting of nationally recognised landscape and heritage assets.

- 1.7 Negotiations over several months have sought to mitigate the visual impact of the IKEA store. Further mitigation can be secured by condition and although the store would still have an adverse impact from certain views from within the Park and a cumulative impact on the Local Green Gap, the public benefits would outweigh the identified harm. The setting of designated heritage assets is identified as less than substantial and can be justified by the overall public benefits of the development. The loss of two undesignated heritage assets is regrettable but justified by the public benefits of the development.
- 1.8 The report concludes that the matter is finely balanced. The delivery of this strategic housing allocation is vital in order to meet the Councils future market and affordable housing needs and the economic regeneration arguments and job creation are compelling. The submitted viability assessment demonstrates that the Local Plan allocation would not generate sufficient development value to pay for the necessary supporting infrastructure even with the award of Local Growth Funding. In the circumstances the development, on balance, can be justified and is recommended for approval.

2. Site Location

- 2.1 The site measures approximately 61.2 hectares and lies to the east of Lancing (Mash Barn estate) and is approximately 1km north-east of Lancing town centre. Directly to the east of the site lies Shoreham Airport with the Brighton and Hove Albion Football Clubs' (B&HAFC) First Team and Training Academy to the south-west of the site and the A27 trunk road to the north of the site.
- 2.2 The only current vehicular access to the site is via Mash Barn Lane which currently serves four dwellings and agricultural buildings. New Monks House is not within the application site but the other three dwellings and agricultural buildings fall within the site and are to be demolished to make way for the development. Historically, Mash Barn Lane extended to the west linking to the western section of the lane leading out onto Grinstead Lane. However, over time this connection was lost.
- 2.3 To the west of Mash Barn Lane, the site is relatively flat and unmanaged grassland. An existing ditch lined with trees and hedges bounds the northern section of this site. Two smaller parcels of land (outside the application site) lie further to the north before ribbon development along the A27.
- 2.4 On the east side of Mash Barn Lane, the partly implemented planning permission to create an 18-hole golf course has created a very undulating topography dispersed with a number of ditches. An aerial photograph of this area identifies the temporary access road which was used to bring in material to form the contoured golf course and this was subsequently, extended to help the construction of the B&HAFC training ground. This temporary construction access leads off the layby along the

A27 which also incorporates a weigh bridge. Further to the east is the Withy Patch gypsy and traveller site which is also directly accessed from the A27.

- 2.5 To the south-west of the site lies the B&HAFC training ground and along part of the southern boundary of the site is the south coast railway line. The application site also extends to incorporate number 37 Barfield Park as the application also proposes locating a foul sewer under this property. This sewer would then lead under the railway line to connect to an existing Southern Water pumping station before connecting to the main foul sewer under the Brighton Road (A259).
- 2.6 The application site boundary also extends along the south side of the A27 incorporating the associated highway and drainage works necessary to serve the development. The red edging of the site has also been extended since the application was submitted,
 - i) to include the existing footpath along the river Adur and informal subway under the A27 and,
 - ii) to include land adjacent to the River to provide compensatory mudflats.

3. Proposed Development

- 3.1 The application, as described, at the front of this report is a hybrid proposal seeking full permission for the demolition of the various buildings, the erection of 249 dwellings with access via Shadwells Close, a country park, relocation and extension of the Withy Patch gypsy and traveller site, a permanent access onto the A27 via a new roundabout and landscaping and other associated infrastructure including the provision of a pumping facility at the River Adur. The outline planning application is for the non-food retail store (IKEA) albeit the only reserved matter is landscaping and all matters reserved for the erection of a further 351 dwellings, community hub, primary school and landscaping.
- 3.2 The application also includes the provision of two additional pitches for B&HAFC training ground located immediately to the east of its existing training facility.
- 3.3 A Masterplan has been submitted in support of the application and is attached to this report as **Appendix 1**.
- 3.4 **Environmental Statement**

The application is supported by an Environmental Statement (ES). The ES is a means of drawing together, in a systematic way, an assessment of a project's likely significant environmental effects. This is to ensure that the importance of the predicted effects and the scope for reducing them are properly understood by the public and the competent authority before it makes its decision. The Local Planning Authority must take the ES and any subsequent amendments into consideration in reaching its decision as well as comments made by the consultation bodies and any representations from members of the public about environmental issues. Representations made by any person about the environmental effects of the

development also forms part of the environmental information to be duly considered by the relevant Planning Committee.

- 3.5 The Environmental Statement is available on the Council's website, along with the application, drawings, relevant policy documents and the representations received in respect of the application. Copies of the ES, supporting documents and application drawings are also available for Members to view in the Members Room, Shoreham Centre from the 10th July 2018.

- 3.6 The ES covers the following matters:

This hybrid planning application comprises the following supporting statements and studies including an Environmental Impact Assessment:

- Application Form
- Plans and Drawings (see separate schedule)
- Design and Access Statement
- Planning Statement
- Retail Statement
- Agricultural Land Classification
- Contamination Risk Assessment
- Energy and Sustainability Statement
- Hydrogeological Appraisal Report
- Statement of Community Involvement
- Construction Site Waste Management Plan
- Housing Statement
- Section 106 Heads of Terms
- Utilities Statement
- Landscape Specification
- Seed & Shrub Planting Schedule
- Tree Planting Schedule
- Strategy and Schedule for Landscape Maintenance
- Environmental Statement with the following Technical Chapters,
 - Socio Economic
 - Transport and Access
 - Noise and Vibration
 - Air Quality
 - Water Resources
 - Ecology
 - Archaeology and Heritage
 - Landscape and Visual
 - External Lighting

- 3.7 The submitted Design and Access Statement (DAS) explains the methodology behind the proposed Masterplan and alternative layouts considered as part of the evolution of the Scheme. The DAS has been revised to take into account various revisions to the Scheme.

- 3.8 The submitted ES has been amended on two occasions. Under the Environmental Impact Assessment Regulations this is described as Further Information to the Environmental Statement (FIES). This has required two additional consultation periods in February and May 2018 (minimum of 30 days) The amendments are set out below:

The planning application was revised in December 2017 with amended plans, supporting documents and Further Information to the Environmental Statement. The principle changes made to the Proposed Development were as follows:

- A reduction to the height of the IKEA from 13.10 to 12.14m
- A slight reduction to the form and footprint of the IKEA (from 32,900 to 31,099sqm).
- A reduction in the density of the south-east corner residential development and general improvements to the layout.
- Inclusion of Footpath 2049 within the red line of the Application Site to allow for widening/improvements up to and including the A27 Flyover (ending at the boundary with the SDNP).
- Inclusion of an additional piece of land near the proposed Pumping Station for the purposes of providing an additional area of mudflat to mitigate loss of mudflats as a result of the Pumping Station (providing an overall net increase).

The additional documentation submitted in December 2017 comprised:

- Amended Drawings
- Updated Design and Access Statement
- Updated Hydrogeological Statement
- Indicative Landscaping Framework for IKEA
- Onsite Street Design Statement
- A response to the queries raised in respect of the Flood Risk Assessment (FRA)
- Watercourse and Flood Defence Management Plan
- Further Information to the Environmental Statement (FIES) which either supplements or replaced parts of the ES submitted with the planning application.

The planning application was amended again in May 2018 and additional information submitted covering the following matters:

- Revised Residential Drawings – incorporating design and layout changes in response to Officers comments;
- Revised IKEA Drawings – increasing the amount of green roof, incorporating louvres on the north elevation of the building and additional landscaping;
- Updated Masterplan and Design and Access Statement (DAS);
- Indicative NMU Provision Plan (VN40408 G115);
- River Adur Footpath/Bridleway Plan (VD14260_SK 0101);
- Addendum to the Landscape and Visual Impact Assessment (LVIA);

- Ecological Report on Proposed Pumping Station – addressing Natural England's (NE) request for additional information and confirmation of the measures proposed to mitigate the loss of mudflat/saltmarsh resulting from construction of the Pumping Station.

Masterplan

- 3.9 The amended DAS accepts that the development extends into the Local Green Gap (referred to as strategic gap in the DAS) but that consideration has been given to reduce and, where required, mitigate this impact. It is submitted that the scheme layout has been designed to ensure that the residential area that impinges in the gap is designed more in keeping with the Country Park character and the setting of the IKEA is within the woodland belt and associated A27 corridor.
- 3.10 The DAS and ES review the landscape sensitivity of the area with reference to the Council's Adur Landscape Study update – New Monks Farm Report 2016. The DAS considers the main options for locating the commercial development, school and gypsy and travellers site. Given the desire to accommodate IKEA as part of the overall development, and its large footprint, there are limited options in terms of its siting.
- 3.11 The DAS indicates that the reduction of the Local Green Gap is approximately 6.9 hectares with 47 houses and 7,120sqm of the IKEA store built form extending beyond the indicative built up area boundary, the remainder being car park and access road.

Residential

- 3.12 The first phase of residential development up to 249 dwellings is served off Hayley Road. The density of development is approximately 35 dwellings per hectare, with residential dwellings generally two storeys in height and blocks of flats varying between three and three and a half storeys in height.
- 3.13 It is submitted that the proposed layout has been informed by the need to retain the existing watercourses through the site and aid pedestrian permeability to the existing built up area with access points provided to Hayley Road, Mash Barn Lane and the A27.
- 3.14 A revised Design and Access Statement (DAS) has been submitted which sets out the different design codes to inform the consideration of subsequent reserved matters applications for the remainder of the development. The overall mix of dwellings is set out in the following table,

| Dwelling Type | Market | Affordable | Total |
|---------------|--------|------------|-------|
| 1 bed | 18 | 54 | 72 |
| 2 bed | 162 | 74 | 236 |
| 3 bed | 155 | 50 | 205 |
| 4+ bed | 87 | 0 | 96 |
| Total | 420 | 180 | 600 |

Non-Food Retail (IKEA)

- 3.15 The non-food retail element of the proposed development is located to the north of the site and would be directly served from the new roundabout on the A27. During the course of the application the design of the store has been amended reducing in height from 13.10 metres to 12.14 metres and its floorspace reduced from 32,900sqm to 31,099sqm.
- 3.16 The proposed store would be arranged over two levels with the showroom and customer restaurant on the first floor, together with staff areas. It is submitted that as with most IKEA Stores, the 'Market Hall', self-serve warehouse, checkouts and other operational back up areas would be situated on the ground floor.
- 3.17 The proposed store would measure approximately 186 metres in length with a maximum width of 120 metres. Following negotiations to reduce the visual impact of the development, an additional area of green roof has been added to a section of the roof facing north (1,920sqm). This is in addition to a section of green roof projecting out from the east elevation of the building (2,600sqm).
- 3.18 Most recent changes to the scheme have incorporated louvres along the north elevation of the building.
- 3.19 To the east of the store a surface car park is proposed which would provide 1,036 parking spaces (including 67 staff spaces). Covered cycle parking is to be provided with 50 spaces and 10 external cycle hoops. The car park has been revised to introduce additional planting and avoid long linear lines of parking.

Education and Community Hub

- 3.20 To the west of the proposed IKEA, it is proposed that land be dedicated to provide a one Form Entry (FE) primary school with space to be expanded to a two-form primary school. The school would have a floorspace of up to 3,000 sq metres and, along with a sports field and expansion space, would have a total area of 2.102 hectares. It is indicated that the school would be two storey and have a height of 10 metres to the parapet.
- 3.21 A community facility would be provided as part of the later phases of residential development with a floorspace of up to 250 sqm. This is referred to as two retail units but could be occupied by a use to benefit the new community.

Country Park

- 3.22 As originally submitted, it was indicated that the country park would form approximately 28 hectares of land between the eastern boundary of the housing development and the western boundary of Shoreham Airport. Some of the areas indicated form part of the strategic landscaping for the IKEA store and, as amended, the country park extends to 25.5 hectares of land. A detailed landscaping scheme has been submitted for the country park. Primarily the park would comprise semi managed open grass areas interspersed with trees.
- 3.23 The historic locations of salterns (mounds of river mud formed as part of the salt extraction process) is used to create landscape features with raised mounds of up to 2 metres in height providing viewpoints. It is submitted that every opportunity to enhance ecology is taken by creating varied habitats.

Access Alterations

- 3.24 It is proposed that all vehicular access to the site will be via a new roundabout junction from the A27. However, the first 249 dwellings would be accessed initially via Hayley Road. The proposed roundabout from the A27 would be completed prior to the IKEA being opened and the remaining 351 dwellings being constructed. Following the completion of the roundabout, vehicular access from Hayley Road would be for buses, pedestrians, cyclists and emergency vehicles only. This would be restricted by way of a bus gate. The other highway works forming part of the application are set out below:
- A new signalised roundabout on the A27 fronting the New Monks Farm development site;
 - A new 50 mph speed limit on the A27 on approach to, and including, the new signalised roundabout;
 - An airport link road to the east from a new internal roundabout to Old Shoreham Road, which will provide access to Shoreham Airport and Ricardo Engineering;
 - Removal of the existing Old Shoreham Road traffic signal controlled junction with the A27;
 - Removal of the existing Coombes Road traffic signal operation with access retained via a left in/left out arrangement from the eastbound A27 carriageway, allowing access to Lancing College and the South Downs National Park;
 - Removal of the two existing accesses on the A27 serving the Withy Patch Gypsy and Travellers Site, with the relocation of this site to be accessed from the Airport Link Road;
 - Retention of the existing off-carriageway foot/cycle links along the southern side of the A27;
 - Creation of a new off-carriageway foot/cycle link along the northern side of the A27 linking to Hoe Court and Lancing College;
 - Provision of an at grade Toucan crossing facilities at the new roundabout retaining controlled crossing facilities on the A27 for north-south movements;

- Creation of new off-carriageway foot/cycle links as part of the internal road layout, providing an alternative route away from the A27;
- Inclusion of a new foot/cycle link into the site from the existing Mash Barn estate, which can also serve as an alternative emergency vehicle access.

Drainage Strategy

- 3.25 In support of the planning application, a Flood Risk Assessment and Drainage Strategy has been submitted. The overall strategy is to provide a northern watercourse running along the northern boundary of the site which will collect ground water rising through the spring line along the A27 boundary, surface water discharging from Manor Close, the A27 and the IKEA store. This would then discharge into the River Adur via a pumping station located on the western bank of the River Adur (designed in conjunction with the approved Adur Tidal Walls Scheme). The current outfall in this location is via a tidal flap which is tide locked for 6 hours every tide cycle. The pumping station would allow discharge into the river over a twenty-four hour period and, therefore, is designed to increase the discharge capacity.
- 3.26 The surface water generated by the new housing development and the greenfield run off from the proposed country park would be discharged into the existing network of Lancing ditches. The ditches discharge through the existing culvert under the Airport runway and through the southern outfall into the sea at the Shoreham Dogs' Trust.
- 3.27 The proposed drainage system has been designed to cope with a one hundred year plus a forty percent climate change event.

4. Relevant Planning History

Reference **L/87/00/TP/20334** - 'Pay & Play' Golf Course & Ancillary Facilities with Vehicular Access from North & West/Vehicular Exit to North; & Parking & Picnic/Rest Area adjacent to the A27 - Approved 24 Nov 2005 (with a s106 Agreement).

Reference: **L/86/00/TP/20333** - Public Open Space (Sports Pitches and Informal Space) With two-way Access Road & Footway To West - Approved 24 November 2005 (with a s106 agreement).

Reference: **ADC/0060/08** - Temporary use for the recycling of aggregates for the construction of golf course under permission L/87/00/TP, with onward sale of aggregates unsuitable for use on site – approved 28 April 2008.

Reference: **ADC/0068/10** - Application for variation of Condition 1 (Temporary continuation of the recycling of aggregates beyond 30 April 2010 of planning permission ADC/0060/08) – approved 18 April 2011.

On land to the south west of the site various permissions have been granted in connection with the Brighton and Hove Albion Training ground:

Reference: **AWDM/0205/12** for the development of the training ground was approved in January 2013 (with a s106 legal agreement).

Reference: **AWDM/0205/13** to extend the training ground by 3 pitches was approved in December 2013 and subsequent applications have been approved for floodlighting to the community pitch (AWDM/0171/14) and the replacement of an academy pitch with a futsal pitch and running hill (AWDM/0277/14).

Reference: **AWDM/1716/15** for a 500-seat spectator stand within the training ground was also approved in April 2016 together with a visual screening bund to the north of the training ground along with a new maintenance vehicle access road (AWDM/0759/16).

Reference: L/168/05 - To the north west of the application site (east of Manor Close) a planning application to erect up to 100 dwellings was refused on the 2 November 2005 on the grounds that it would constitute an intrusion into the countryside and strategic gap, as well as create an unacceptable increase in traffic leaving and entering the A27. Reference: **AWDM/1614/15** - The Adur Tidal Walls flood defence improvement scheme relating to 1.8 km of tidal defences along the River Adur was approved in 22 February 2016. This permission is currently being implemented and works have commenced on the Airport Reach.

Various permissions have been granted for developments at Shoreham Airport, however, the most relevant application is the proposal for 25,000 sqm of commercial floorspace on land south of Ricardos and adjacent to Cecil Pashley Way which is due to be determined by Planning Committee on the 30th July 2018 (**AWDM/1093/17**).

5. Consultations

West Sussex County Council Highways

Originally objected to the application on the basis that additional information was required to address a number of points including:

IKEA trip distribution and assignment, school traffic, trip generation from employment, development at Shoreham Airport and assessment of traffic flows from the development. Following a number of months of negotiations and addendums to the original TA the final comments of West Sussex as the Highway Authority are set out below:

West Sussex County Council – Highways (Final Response)

'The planning application is for a hybrid development scheme seeking full planning permission for the demolition of existing buildings and the erection of 249 dwellings with temporary access provided via Grinstead Lane, a country park, relocation and extension of the Withy Patch Gypsy and Traveller site, landscaping and other associated infrastructure (including pumping facility at the River Adur). The permanent access to the site is proposed via a new roundabout from the A27.

The second part of the application is an outline application (with only landscaping reserved) for a non-food retail store (Use Class A1) and an outline planning permission

(with all matters reserved other than access) for the erection of a further 351 dwellings, a community hub and primary school.

Local Plan

The New Monks Farm site is allocated within the adopted Adur Local Plan and the relevant site policies within the plan are detailed below:

Policy 5: New Monks Farm, Lancing:

Land at New Monks Farm will be allocated for mixed use development comprising:

- A minimum of 600 homes, 30% of which are to be affordable, providing a mix of types and tenures in accordance with identified needs.*
- A community hub.*
- 1 hectare of land to accommodate a 1-form entry primary school, with additional land for expansion to 2-form entry in the future.*
- A minimum of 10,000sqm of appropriate employment-generating floorspace.*
- 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 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.*

The proposed application differs from that assessed and put forward within the local plan allocation. The application proposes a non-food retail store (IKEA) as opposed to the minimum of 10,000sqm of employment generating floor space as set out within the local plan. These changes to the proposed land use will impact upon the trip generation associated with the development when compared to the assessments made as part of the local plan transport evidence base. As a result the trips generated by the development would result in a lower than local plan assessment impact in the weekday AM peak but higher in the weekday PM and Saturday peak periods.

As such, it is recommended that a condition is placed upon the non-retail element to ensure trips to the non-food retail store do not impact on the weekday AM peak period.

Joint Transport Assessment

A joint Transport Assessment (TA) was submitted with the Shoreham Airport proposals for the erection of new commercial buildings to provide up to 25000m² of floorspace for Light Industrial (Use Class B1c), General Industrial (Use Class B2) and Storage and Distribution (Use Class B8).

It should be noted that Policy 7 of the Adur Local Plan allocates 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.

Vehicular access

Vehicular access is proposed to be taken directly from the A27 to the north of the site via a new roundabout on the trunk road and through a network of residential roads off Grinstead Lane to the west. The latter is to serve an initial 250 homes forming part of the residential component of the site, until such time as the permanent access onto the A27 is completed. At which time it is proposed to close the Grinstead Lane access to motorised traffic other than buses, pedestrians and cyclists. Pedestrian and cycle access is proposed from both the A27 and Grinstead Lane and also via links to and from the east via Old Shoreham Road.

As part of other off-site highway works, it is proposed to downgrade the existing Sussex Pad traffic signal controlled junction to the east of the site on the A27 by removing the pedestrian crossing and junction with Old Shoreham Road. The existing access to the airport via Old Shoreham Road will be replaced by the proposed new roundabout access from the A27. Modifications to Coombes Lane are also included as part of these works to the north of Sussex Pad. The applicant also proposes a reduction to the existing speed limit of 70mph to 50mph on the westbound approach to new roundabout on the A27.

At the point of opening of the new A27 access it is proposed to close the access at Hayley Road to vehicles except buses and emergency vehicles through the implementation of a bus gate.

At present, it is not currently possible to enforce a bus gate within WSCC utilising Automatic Number Plate Recognition (ANPR) alone. As such the design should include a rising bollard and include provision of a bypass facility to allow maintenance to be undertaken. WSCC bus gate guidance has been provided to the applicant's consultant and comments upon the initial design. The phasing of the implementation of the bus gate would need to be secured via condition.

Access to Lancing College/Coombes Road

A left in left out arrangement is proposed to serve Coombes Road, this would require vehicles accessing the college to travel to the A27/A283 junction to perform a U turn if heading westbound or if accessing the site from the east travelling to the site access roundabout and performing a U turn manoeuvre to access Coombes Road. It is recognised that both of these manoeuvres would add additional mileage and time for motorised users of Coombes Road.

A safety audit of the works has been undertaken and designer's response provided.

The applicant has also indicated that they are willing to submit a planning application to provide a 4th arm at the site access roundabout to serve Lancing College. Modelling has been provided to show that the link would work in terms of capacity however concerns have been raised about design issues.

Pedestrian and Cycle and Horse Rider access

The application is to provide two crossings of the A27 to replace the existing provision at the Sussex pad junction. The proposed crossings are:

- At grade signal control crossings provided as part of the site access roundabout.*
- Upgrade of Footpath 2049 to Bridleway. Following discussions with the applicant a scheme has been developed to provide a route alongside the River Adur from the Shoreham Toll Bridge northwards passing under the A27 and then turning westwards to link with Coombes Road. The upgrade of footpath ref 2049 as shown on the general arrangement plan ref VD14260-SK-0101 and proposals included within SDNP/18/00434/FUL shall be implemented prior to the removal of the Sussex Pad Traffic lights and signalised crossing.*

It is recognised that the new pedestrian routes create a degree of delay for pedestrians, however, overall the provision of two links is considered preferential and outweighs the potential delay.

Additional pedestrian/cycle connections are to be provided at:

- Mash Barn Lane - A shared use route is to be provided along Mash Barn Lane to the north east boundary of the site, this would then link into the existing shared use route alongside the A27.*
- Mash Barn Lane - A shared use link is also to be provided to the south west of the site via the Brighton and Hove Football club training facility.*
- Alongside the bus gate connecting into Hayley Road.*

It is also recommended a link is provided into/across Shadwell Park to allow new residents to access the recreation facilities, without such a link an informal link is likely to be created.

Offsite links

Concerns were originally raised by the Highway Authority over the offsite walking and cycling provision between the site and local amenities. Following discussions with the applicant off-site improvements have been identified; these include the following:

- Provision of dropped kerb/tactile paving within the residential area to the west of the site around Mash Barn Lane.*
- Upgrade of pedestrian crossing of Grinstead Lane between Mash Barn Lane and Grinstead Avenue to allow cycle use with associated supporting approaching routes.*

The improvements identified above would improve pedestrian and cyclist routes to Lancing centre, Lancing railway station and the Sir Robert Woodward Academy.

Trip Generation/Distribution and Assignment

Previous consultation responses have dealt with concerns over trip generation, distribution and assignment from the site.

A comparison with trips within the local plan has been undertaken within the transport assessment. It can be seen that the New Monks Farm development would result in a decrease in trips in the AM peak when compared to the envisaged development within the local plan. The proposals would result in an increase in trips in the PM peak and Saturday peak.

As a combined access and contribution strategy has been developed with the Shoreham airport application and as such some of the trips associated with NMF proposals are offset by the reduced trip generation of Shoreham Airfield proposals. ADC should be sure that the proposals for the airport site do not revert to those contained within the local plan.

Modelling

Junction Modelling has been provided for:

Grinstead Lane/Mash Barn Lane/Crabtree Lane 4-arm staggered priority junction. The results of which show that that the junctions would continue to operate within capacity. Should the movements utilise Grinstead Lane/Curvins Way junction then this could accommodate the likely additional movements.

A27/Grinstead Lane Junction

The base year modelling provided shows that the Grinstead Lane approach to the junction is close to capacity with an AM peak Ratio of Flow to Capacity (RFC) of 0.98, Queues of 19 Passenger Car Units (PCUs) and Delays of 2 minutes and a PM peak of 0.95 RFC, 13 PCUs and delays of 80 seconds.

Without mitigation delays on the Grinstead Lane approach would increase to 1.1 RFC, 74 PCUs and 6 minutes in the AM peak and 1.0 RFC, 24 PCUs and 98 seconds in the PM peak. As such a mitigation scheme has been proposed as shown on Drawing No. VN40408/PL-032 for the initial phase (250 homes) of development. The scheme provides two full lanes along Grinstead Lane over a longer distance back from the stop line, together with markings and signage directing vehicles to use both lanes.

Given the modelling provided highlights the Grinstead Lane approach is already at 0.98 RFC and anything above 0.85 RFC is considered to be approaching theoretical capacity, it is recommended that the improvements are provided prior to first occupation.

Site Access

The site access junction is the responsibility of Highways England who have provided the main comments and have identified the modelling parameters utilised are acceptable. Following WSCC previous comments revision to the parameters include:

- Alignment to the peak periods.*
- Inclusion of primary school development trips.*
- Utilisation of the National Traffic Model adjusted growth figures.*

A range of sensitivity tests have been undertaken including:

A sensitivity test of 500 two-way trips in the weekday evening peak only, based on the surveyed flow from the Cardiff IKEA store varying so much across the day and the

population difference between the Cardiff and Lancing store catchments. These trips have been incorporated in the sensitivity testing carried out by Vectos, using the same methodology in terms of trip types and distribution as in the TA.

The modelling has been accepted and highlights that the junction would operate within capacity.

A27 Grinstead Lane

The modelling provided highlights that the junction is currently over capacity and would continue to be so in the future year scenario. A scheme was developed as part of the Local plan transport study; however the applicants transport consultant has developed an alternative scheme that mitigates the impact of the development.

The junction is the responsibility of Highways England who have provided the main comments and have identified the modelling parameters utilised are acceptable. The modelling provided shows that both the Grinstead Lane and Manor Road approach remain within capacity.

Maximum queues would be in the AM peak with 5 vehicles on Grinstead Lane and 10 on Manor Road. Delays are predicted to be 30 seconds on Grinstead Lane and 95 seconds on Manor Road.

It should be noted that the A27 arms would remain over capacity however the scheme provides a nil detriment solution.

Internal Roundabouts

Two internal roundabouts have been modelled for the AM, PM and Saturday Peaks, the results of which show that they would operate with minimal queues or delays.

The junctions have been modelled as single lane approaches as a worst case scenario to demonstrate that there is sufficient capacity.

Additional Junctions

No further modelling has been provided for additional junctions outside of the study area, the applicant has provided suitable information to demonstrate that the flows on the wider network are not an increase over those contained within the local plan transport study and as such can be dealt with by suitable funding towards the infrastructure identified within the Infrastructure Delivery Plan (IDP).

Route Improvement Strategy (RIS) Scheme

It should be noted that Highways England are currently consulting on a preferred option for the Grinstead Lane junction. At this moment in time the scheme is not committed and as such has not been included within the modelling. The scheme proposed by the applicant provides a level of mitigation that means the local plan development can be accommodated at the junction and provides a 'no worse' improvement. It is not intended to resolve the existing capacity issues at the junction. Should the RIS scheme proceed then the value of the mitigation works proposed by the applicant will be provided to Highways England to support the RIS scheme.

Parking

A total of 568 residential parking spaces are to be provided for the initial phase of development in line with the WSCC parking demand calculator. This consists of 524 spaces for residents and 44 visitor spaces.

A total of 1021 car parking spaces are provided at the IKEA store of which 55 are for disabled users, 40 family spaces, 67 staff spaces and 6 spaces for electric vehicles. The level has been proposed by the applicant based on operational requirements.

Cycle parking

Cycle parking is provided in accordance with West Sussex County Council's guidance:

- *1 and 2 bedroom apartments – 0.5 spaces per unit in communal storage rooms*
- *1 bedroom houses – 1 space per house*
- *3, 4 and 5 bedroom houses – 2 spaces per house*

Where properties are provided with garages these are designed to be to the minimum internal dimensions of 3.0 metres width x 6.0 metres depth for a single and 6 x 6 metres for a double. Internal cycle racks or fixings will be provided within the garages for cycle storage. Those properties that are not supplied with a garage will be provided with a garden/cycle shed located in their rear gardens. For these dwellings garden access is available via an external gate down the side or from the rear of the property.

60 Cycle Parking spaces are also to be provided at IKEA.

Adoption

The limits of adoptable highway are shown on drawing number 2800 D and consist of the links between the site access and approximate location of the Sussex Pad junction towards Shoreham Airport and between the site access and the proposed location of the bus gate between the site and Hayley Road.

Road Safety Audits

Road Safety Audits have been undertaken for the internal network that is to be adopted and signed designers responses have been provided.

Servicing

A swept path analysis has been provided and is accepted. The IKEA store will provide a dedicated service yard.

Visibility Splays

Following previous concerns revised visibility splays have been provided on drawing ref 2721F and confirms the visibility splay as shown at plots 7 - 21 is 2.5 x 25m. There was an error on the label noting 15m which has been corrected.

It is noted that a number of visibilities run through areas of parking or across property boundaries however the areas are to remain unadopted and given the low speeds of the area the level of encroachment would be acceptable in line with the Manual for Streets guidance document.

Public Transport

The applicant has provided the following information.

“Based on the discussions with operators a number of principles have been established. On first occupation of the residential development consideration is being given to a 20 minute service linking the site via Mash Barn Estate to Lancing railway station and the existing Pulse service, which is the main service through Worthing and Lancing. This would complement the existing Service 9 that operates hourly and passes close to the site along Shadwells Road, and the number 7 service which runs along Grinstead Lane within walking distance of early phases on the housing development. Access to Lancing railway station would provide access to wider destinations including Brighton.

The uptake of the service would be kept under review as housing occupation progresses. Once IKEA is open, the objective would be to extend the existing 10 minute Pulse Service to serve IKEA and the developing residential site. In addition, once the main A27 access and internal infrastructure has been completed, this would allow the diversion of the No. 9 service through the site, as advised by the operator, providing better links to Shoreham, Southlands Hospital and Holmbush.”

The provision of the above information highlights that the site will benefit from public transport services from the early stage of the development that will then increase as the site is built out. It is recommended that a bus service schedule is developed prior to occupation.

Travel Plan

Comments have been provided on the draft travel plans submitted as part of the application. It is understood that the applicant is proposing that specific travel plans will be developed by the residential and commercial developers and as such can be dealt with by condition.

Red line boundary

It is noted that the redline boundary at the south west of the site (Mash Barn Lane) does not join up with the highway boundary, the land between is understood to previously unregistered and as such is currently seeking to be adopted under a Section 228 Agreement. It is understood at present remedial works have been undertaken and are awaiting approval.

Internal network speed limit

Concerns have previously been raised over the speed limit of the link between the site access and the Shoreham Airport proposals; the applicants response to the concerns raised is that the carriageway has been designed in line with Manual for Streets guidance to achieve a self-enforcing 30mph speed limit. As such the concerns remain, however the speed limit of the link is to be confirmed at S38 stage.

Internal Mash Barn Lane

Concerns have previously been raised concerning the design of Mash Barn Lane and access to the school site. The applicant has confirmed that the Mash Barn Lane access is a 3m wide cycle footway that also provides a single access to the existing Farm House and is part of the detailed Planning Submission. The second access is within the outline

application area and can be revised/realigned to either share the access with Mash Barn Lane or an alternative to be confirmed as part of a Reserved Matters Application.

IKEA Internal Highways

Within the Highway Authority's previous correspondence concerns were raised about the distance between the first parking aisle and the site access roundabout. The first parking aisle provides a number of priority spaces for families and disabled parking as well as unrestricted spaces closest to the store entrance.

Whilst little further information has been provided except that it has been considered by the design team. The Highway Authority have undertaken a review using aerial photography of other IKEA sites which show a mixture of parking provisions (surface and multi storey) and availability of spaces close to the site accesses. A review of press literature has highlighted that it is often in the first couple of weeks that parking pressure has the potential to cause queues on the local network.

As such it is recommended that an event management plan is created for the initial opening phase (and can be called upon as and when required) to included measures such as marshalling and signage for visitors and travel planning information for local residents.

IKEA roundabout junction

It is noted that "The roundabout layout and main access road have been designed to maximise the area available for the Country Park, meet the main access from the A27, cross the existing watercourses perpendicular to the flow as far as possible and accommodate the internal car parking layout for IKEA" and "The design could be rotated to make the separation between arms more evenly spread but this would not materially change the operation of the access. Even if the access arm was rotated the exit radius would not change so again no material change would be made to the operation of the access."

It would be WSCC preference that the junction is altered to evenly redistribute the arms.

Cycle routes within the country park

A number of 'footpaths' within the country park are suggested to be suitable for cycling. Whilst some are 4m wide and would provide sufficient space to accommodate shared use, a number of others are 2m wide. It is recommended that if these are to accommodate cyclists that these are widened to a minimum of 3m in width.

Construction Management Plan

Whilst access for the full application of up to 249 homes is to be provided via Hayley Road, access for construction vehicles is shown in the construction sequence plan to take place from a haul road from the A27.

The following issues have been identified and should be addressed as part of any future CMP.

- Ensuring measures are in place to stop rat running during the application.*
- Ensuring an east west cycle route is maintained during construction.*

- *Benefit of constructing walking and cycling link to Mash Barn Lane (linking into the football training facility at an earlier stage/If not providing link across Shadwell Road park.*

Other

It is recommended that a formal path is provided across Shadwell Park, from inspection of the site layout plans without any boundary treatment proposed it is likely that should an informal provision not be provided then residents are likely to create an informal route.

Contributions

The following contributions have been agreed with the applicant:

- *The applicant has provided a design for the A27/Grinstead Road that would provide equal or more mitigation than the local plan improvements. Should a scheme be progressed under the Highways England Route Improvement Strategy then the contribution of £640,000 will be put towards that scheme.*
- *Improvements to pedestrian and cycle links has increased from £38,000 to £100,000.*
- *Public transport Service £1,211,000 - Contribution to be funded by NMFD Ltd, entering directly into contract with a bus operator.*

Whilst the Infrastructure Delivery Plan details a contribution should be taken towards site specific behaviour initiatives, due to the travel plans being conditioned and measures included within them, this is not required.

As noted previously the contributions associated with the Shoreham Airport application have also been agreed to provide a cumulative mitigation package.

For the avoidance of doubt these are:

- *£148,800 towards off site highway works (Junctions identified in the Adur Local Plan (but not A27 / Grinstead Lane / Manor Road))*
- *£39,000 towards the upgrade of bus stops located closest to the development on Old Shoreham Road to include raised kerbs and real time information displays.*

I would highlight that ADC should be content that the remaining works within the IDP can be funded by the remaining site allocations namely, West Sompting and Shoreham Harbour.

Conclusion

No objection is raised to the application subject to the S106 and conditions detailed below.

Agreement with Highways England for the appropriate mechanism to secure:

- *Works to Grinstead Lane as identified in drawing no VN40408/PL-010 Rev D or a contribution of £640,000*

S106 Agreement

- *Prior to the first occupation of the development improvements to Grinstead Lane approach to A27 as shown on Drawing No. VN40408/PL should be carried out.*
- *£100k Grinstead Road crossing upgrade and cycle route and provision of tactile paving within the Mash barn estate.*
- *Development of a bus service schedule and provision of a bus service.*

Conditions

- *It is assumed that a suitably worded condition would be required to limit the operating hours of IKEA in such that it does not impact the AM peak period.*
- *The non-food retail store (IKEA) store or 250th dwelling shall not to be occupied until such a time that the A27 access roundabout is complete.*
- *Implementation of a bus gate between the development and Hayley Road in conjunction with A27 access roundabout being provided.*
- *The upgrade of footpath ref 2049 as shown on the general arrangement plan ref VD14260-SK-0101 and proposals included within SDNP/18/00434/FUL shall be implemented prior to the removal of the Sussex Pad Traffic lights and signalised crossing.*
- *An event traffic management plan should be prepared for the opening weeks of the IKEA store.*

The conditions recommended by the Highway Authority are included in the recommendation and cover the following matters:

1. *Construction Management Plan*
2. *Travel Plan (to be approved) – Residential and Workplace*
3. *Servicing Management Plan*
4. *Structures Check in connection with the proposed bridges*
5. *Cycle parking*
6. *Car parking space (details approved)*

A number of informatives are also proposed which are included in the recommendation.

Highways England (First Response)

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the Strategic Road Network (SRN), in this case the A27 Old Shoreham Road / Shoreham Bypass.

Highways England are currently in discussions with the applicants consultants Vectos regarding the Transportation Assessment in its considerations of the likely impacts to the safe and efficient operation of the A27 Trunk Road. There are several matters of concern which need to be clarified before Highways England can determine whether or not the development proposals and suggested Highway Improvements will be sufficient to mitigate the developments impacts. Once these matters have been clarified and the mitigations accepted the mitigation design will need to be subject to independent Road Safety Audit as well as a necessary Departure from Standard being applied for

Until such time as the required information has been provided and accepted by Highways England, our informal advice is that you should not approve this application because of the developments potential to cause severe harm to the safe and efficient operation of the A27 Trunk Road forming part of the national Strategic Road Network.

Highways England (Final Response)

"Referring to the notification of a planning application dated 13th July 2017 referenced above, in the vicinity of the A27 Old Shoreham Road that forms part of the Strategic Road Network, notice is hereby given that Highways England's formal recommendation is that we recommend that conditions should be attached to any planning permission that may be granted (see Annex A – Highways England recommended Planning Conditions);"

**This conditional response is provided on the understanding that it is agreed between Highways England, Adur District Council and the applicant that it will be a requirement of the Section 106 Agreement of the Town and Country Planning Act 1990 that prior to bringing into use any part of the retail element and or the 250th occupation of the residential element of the development hereby permitted, that the Applicant will enter into a Section 278 agreement of the Highways Act 1980 with Highways England to either provide and open to traffic the highway improvements to the A27 Old Shoreham Road / Grinstead Lane / Manor Road Roundabout in accordance with the Vectos Drawing No. VN40408/PL-010 Rev D (Proposed Works Site Plan) or pay a contribution in full for the cost of the works shown in Vectos Drawing Number VN40408/PL-010 Rev D.*

We recommend that the following conditions be attached to any permission granted:

Conditions

- 1) *Prior to the first occupation of any of the residential dwellings of the development hereby permitted, the highway improvements to the A2025 Grinstead Lane approach arm of the A27 Old Shoreham Road/ Manor Road / Grinstead Lane Roundabout shall be provided and opened to traffic in accordance with Vectos Drawing No. VN40408/PL-032 (A2025 Grinstead Lane Improvements onto A27).*

Reason: *To ensure that the A27 continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980, to satisfy the reasonable requirements of road safety and to prevent environmental damage.*

- 2) *Prior to bringing any part of the retail floor space of the development hereby permitted into use, the highway improvements to the A27 Old Shoreham Road providing the*

main access to the site shall be provided and opened to traffic in accordance with Vectos Drawing No. VN40408/PL-015 Rev H (Proposed A27 Old Shoreham Road Improvements Development Access / Sussex Pad Works).

Reason: *To ensure that the A27 continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980, to satisfy the reasonable requirements of road safety and to prevent environmental damage.*

- 3) *Prior to the 250th occupation of the residential element of the development hereby permitted, the highway improvements to the A27 Old Shoreham Road forming the main access to the site shall be provided in accordance with Vectos Drawing No. VN40408/PL-015 Rev H (Proposed A27 Old Shoreham Road Improvements Development Access / Sussex Pad Works).*

Reason: *To ensure that the A27 continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980, to satisfy the reasonable requirements of road safety and to prevent environmental damage.*

- 4) *Prior to bringing any part of the retail floor space into use and or the 250th occupation of the residential element of the development hereby permitted and in conjunction with either Conditions 2 or 3 and 5, the highway improvements to the A27 Old Shoreham Road / Coombes Road junction shall be provided and opened to traffic in accordance with Vectos Drawing No. VN40408/PL-030 Rev A (Proposed A27 Old Shoreham Road Improvements Sussex Pad Merge / A283 Diverge Carriageway Link).*

Reason: *To ensure that the A27 continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980, to satisfy the reasonable requirements of road safety and to prevent environmental damage.*

- 5) *Prior to bringing any part of the retail floor space into use and / or the 250th occupation of the residential element of the development in conjunction with Conditions 2 or 3 and 4, the shared footway improvements on the northern side of the A27 Old Shoreham Road and to the east of Coombes Road shall be provided in accordance with Vectos Drawing No. VD14260-SK-0101 Rev C (GENERAL ARRANGEMENT OPTION A - 2.5m FOOTWAY/CYCLEWAY) and HED Drawing No. HED-1172-LA-601 Rev 01 (River Adur to Coombes Road NMU Link – Master Plan and Elevation) and opened for use by the public.*

Reason: *To ensure that the A27 continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980, to satisfy the reasonable requirements of road safety and to prevent environmental damage.*

Informative:

1. Provision of Grinstead Lane Improvements

The above conditional response is provided on the understanding that it is agreed between Highways England and Adur District Council and the Applicant that it will be a requirement of the s106 Agreement of the Town and Country Planning Act 1990 that prior to bringing the retail element into use and / or the 250th occupation of the residential element of the development hereby permitted, that the Applicant will enter into a Section 278 agreement of the Highways Act 1980 with Highways England to either provide and open to traffic the highway improvements to the A27 Old Shoreham Road / Grinstead Lane / Manor Road Roundabout in accordance with the Vectos Drawing No. VN40408/PL-010 Rev D (Proposed Works Site Plan) or pay a contribution in full for the cost of the works shown in Vectos Drawing Number VN40408/PL-010 Rev D.

South East Power – UK Power Networks

No objections to the proposed works.

Sussex Police (Local Policing Branch) –

Comments that the applicant/agent should look at its website www.securedbydesign.com where SBD Homes 2016, SBD Commercial Development and New Schools can be found, providing detailed advice to adopt crime prevention measures. Extracts from the consultation response are set out below:

“Relocation & Extension of Withy Patch Gypsy & Travelers Site.

I was pleased to note each occupier pitch has defensible space and its own demarcated perimeter. Where amenity blocks are provided within the pitches, in order to provide a safe and secure environment for the facilities and the users, I recommend that the doors and windows used in the construction of the amenity blocks conform to PAS 024-2012 or their equivalent. Externally fitted dusk till dawn switched lighting to the amenity blocks would be extremely beneficial for the safety of the users during dark hours.

I would also ask you to note that Sussex Police is now exploring the impact of growth on the provision of policing infrastructure over the coming years and further comment on this application may be made by our Joint Commercial Planning Manager.

The Crime & Disorder Act 1998 heightens the importance of taking crime prevention into account when planning decisions are made. Section 17 of the Act places a clear duty on both police and local authorities to exercise their various functions with due regard to the likely effect on the prevention of crime and disorder. You are asked to accord due weight to the advice offered in this letter which would demonstrate your authority’s commitment to work in partnership and comply with the spirit of The Crime & Disorder Act.

This letter has been copied to the applicant or their agent who is asked to note that the above comments may be a material consideration in the determination of the application but may not necessarily be acceptable to the Local Planning Authority. It is recommended, therefore, that before making any amendments to the application, the applicant or their agent first discuss these comments with the Local Planning Authority.”

“Lighting throughout the developments will also be an important consideration and should conform to the recommendations within BS5489:2013.

In relation to ‘Play Parks’ I would recommend that any areas of play should be situated in an environment that is stimulating and safe for all children, be overlooked with good natural surveillance to ensure the safety of users and the protection of equipment, which can be vulnerable to misuse. I would recommend that the eventual location is surrounded with railings with self-closing gates to provide a dog free environment.

The development in the main has outward facing dwellings with back to back gardens which has created good active frontage with the streets and the public areas being overlooked, this design has all but eliminated the need for vulnerable rear garden pathways. Parking in the main has been provided with in-curtilage, garage & car barn parking and a number of on street parking bays, this should leave the street layout free and unobstructed.

I am pleased to see that the development reflects the attributes of safe, sustainable places set out in Safer Places – The Planning System and Crime Prevention.

These are: -

- Access and movement - places with well-defined routes, spaces and entrances that provide for convenient movement without compromising security.*
- Structure - places that are structured so that different uses do not cause conflict.*
- Surveillance - places where all publicly accessible spaces are overlooked.*
- Ownership - places that promote a sense of ownership, respect, territorial responsibility and community.*
- Physical protection - places that include necessary, well designed security features.*
- Activity - places where the level of human activity is appropriate to the location and creates a reduced risk of crime and a sense of safety at all times.*
- Management and maintenance - places that are designed with management and maintenance in mind, to discourage crime in the present and the future.”*

Sussex Police (Sussex and Surrey Police)

This development will place permanent, on-going demands on Sussex Police which cannot be fully shouldered by direct taxation. Like many other public services, policing is not fully funded via public taxation. This request outlines a number of the capital costs that will be incurred by Sussex Police to enable safe policing of this development. All of the infrastructure outlined in this funding request has been found compliant with regulation 122 of the Community Infrastructure Levy and is considered directly related to the development in scale and kind and necessary to make the development acceptable in planning terms.

The additional population generated by new housing development in Adur & Worthing will inevitably place an increased demand upon the existing level of policing for the area. The development of 600 homes would have a significant impact on the workloads of our existing neighbourhood policing team and divisional/ force wide policing teams. In the absence of developer contributions towards the provision of additional infrastructure,

Sussex Police would be unable to retain the high level of policing that is currently delivered in the district's.

1. Overview of our financing arrangements

Currently 49,128 incidents are attended by 293 officers per year in Adur & Worthing which is a ratio of 167.7 incidents per officer, per year. To retain this current ratio of 167.7 incidents per officer per year, an additional 384 incidents per year would require 2.29 additional officers (229% of an officers workload). The expected incidents generated by this development amount to 229% of a FTE police officers workload.

In addition to the significant impacts this development would place on our policing teams this development would also require significant investment in our support staff capacity. As we have shown, approximately 131 police staff are required to deliver policing to the 76,605 households in Adur & Worthing. This is a ratio of 584 (584.7) households per staff member. Therefore an additional 600 households would require almost the equivalent of one additional staff member to retain this existing ratio.

*In order to mitigate against the impact of growth our office have calculated that the capital "cost" of policing new growth as a result of this major planning application equates to **£109,359.31**. These funds would be used for the future purchase of infrastructure to serve the proposed development. This cost will now be broken down clearly to show the capital infrastructure required to support these new officers.*

Sussex Police would utilise the contribution in the following manner;

- **£8,614.66** towards the full costs of two additional officers. These costs will partially cover the initial start-up cost of one additional dedicated officer to work in the Mash Barn Neighbourhood Policing Team and one additional West Sussex divisional officers to deliver policing to the site and surrounding area.
- **£2,023.42** as a maximum of 1 of 5 pooled payments towards the cost of 1 additional support staff member to be based at the re-provided Shoreham police station. .

It should be noted that these are necessary start-up capital costs incurred by Sussex Police to enable officers and staff to undertake their role.

PREMISES

At present policing within the Mash Barn Neighbourhood Policing Team is delivered from Shoreham and Lancing Police stations. As outlined in the Police Crime Commissioners Estate Strategy 2013-2018 both police station are planned to be re-provided. These projects have currently been delayed due to the production of the emerging Sussex Police Estates strategy (2017-2022) however will be brought forward into the 2019-2020 financial year. The Mash Barn policing team and West Divisional support are planned to be stationed at the new joint facility in Shoreham and we are currently appraising various options for a new site.

Our policy is to provide an alternative facility in the area prior to any station being closed. We are currently investigating opportunities to collaborate with other blue light and public

sector partners. This is considered to be more economical, and reflects the future workspace shared working environment we are trying to develop. We have not yet secured an alternative site to re-provide these facilities, however we would be happy to update the Local Authority as soon as a site is secured.

This development requires 3.26 additional staff/officers to maintain the existing level of policing in the district. The cost of sitting these officers/staff at the new Shoreham Police station would therefore be a minimum of **£70,856.10** ($£1350 \times 16.1 \times 0.67$).

(Note: Following the start of the 2017/18 tax year Sussex Police have reviewed and updated our premises requirements which are now shown above).

VEHICLES

A vital part of providing effective policing to the residents of Adur & Worthing is maintaining the large fleet of vehicles. The (three year lifetime) capital cost of a standard vehicle is;

Patrol Vehicle – **£31,680**

Current fleet deployment within the Adur & Worthing administrative area (serving 76,605 households) currently consists of 48 active divisional vehicles delivering policing directly to the residents of Adur & Worthing.

In total, there are 48 divisional vehicles and 23 Forcewide vehicles delivering policing to the Districts of Adur & Worthing.

This equates to a cost of £29.36 ($£31,680 \div 76,605$) per household. Accordingly in order to maintain the existing level of fleet provision the development would generate a required contribution of **£17,616** (29.36×600). This contribution would be utilised as follows:

- **£17,616** as a maximum of 1 of 5 pooled payments towards the purchase of an additional vehicle for use by the Mash Barn Neighbourhood Policing Teams.

ANPR CAMERAS

Sussex Police are currently promoting a roll out of Automatic Number Plate Recognition (ANPR) Cameras throughout Sussex. There is a limited budget for this at present but a requirement to roll out more cameras to ensure criminals can be identified quickly and efficiently. The number and location of cameras is driven by the scale and location of the proposed development and the road network in the area.

The cost of an ANPR camera is shown below:

Fixed Site ANPR camera (£9,000), intelligent dual lane reading Vector camera with infrastructure in place for single carriageway road. - Vector camera x 1 £4, 000. Installation and setup cost £5,000

Sussex Police concludes that it requires a total of **£109,359.31**. to meet the additional policing demands resulting from the development.

Southern Water (First Response)

"If the applicant or developer proposes an on-site foul sewerage pumping station, this would have to be designed and constructed to the specification of Southern Water Services Ltd. A secure compound would be required, to which access for large vehicles would need to be possible at all times. The compound will be required to be 100 square metres in area, or of some such approved lesser area as would provide an operationally satisfactory layout. No habitable rooms should be located less than 15 metres from the pumping station compound boundary, in order to protect the amenity of prospective residents.

The results of an initial desk top study indicates that Southern Water currently cannot accommodate the needs of this application without the development providing additional local infrastructure. The proposed development would increase flows into the wastewater sewerage system and as a result increase the risk of flooding in and around the existing area, contrary to paragraph 109 of the National Planning Policy Framework.

We are aware that the sewerage system in the vicinity of Manor Close and Manor Way has experienced surcharging on a number of occasions in the past five, or more, years. This stems from elevated groundwater levels in the area and is associated with the high ground to the north of the A27. Typically, these problems are experienced after prolonged periods of high rainfall, mainly in the autumn and winter. Southern Water has made significant investment to tackle the above issue, focused on repairing and sealing sewer pipes to prevent rising groundwater forcing its way into the system.

As a result of the periodic limited capacity in the local sewer network to the west of the proposed Monks Farm development, we will require the wastewater from the development to discharge to the existing sewerage system further south, where there is sufficient capacity within the network to accommodate the additional flow. The surface water from the development will not be discharged to the sewerage system. On this basis, we are able to confirm that the proposals for connecting the foul flows from the Monks Farm development will not exacerbate any problems currently experienced in the vicinity of Manor Close and Manor Way.

The planning application form makes reference to drainage using Sustainable Urban Drainage Systems (SUDS).

Under current legislation and guidance SUDS rely upon facilities which are not adoptable by sewerage undertakers. Therefore, the applicant will need to ensure that arrangements exist for the long term maintenance of the SUDS facilities. It is critical that the effectiveness of these systems is maintained in perpetuity. Good management will avoid flooding from the proposed surface water system, which may result in the inundation of the foul sewerage system.

Thus, where a SUDS scheme is to be implemented, the drainage details submitted to the Local Planning Authority should:

- Specify the responsibilities of each party for the implementation of the SUDS scheme*

- Specify a timetable for implementation
- Provide a management and maintenance plan for the lifetime of the development.

This should include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime.

The Council's Building Control officers or technical staff should be asked to comment on the adequacy of soakaways to dispose of surface water from the proposed development.

The application details for this development indicate that the proposed means of surface water drainage for the site is via a watercourse. The Council's technical staff and the relevant authority for land drainage consent should comment on the adequacy of the proposals to discharge surface water to the local watercourse.

We request that should this application receive planning approval, the following condition is attached to the consent: "Construction of the development shall not commence until details of the proposed means of foul and surface water sewerage disposal have been submitted to, and approved in writing by, the Local Planning Authority in consultation with Southern Water."

This initial assessment does not prejudice any future assessment or commit to any adoption agreements under Section 104 of the Water Industry Act 1991. Please note that non-compliance with Sewers for Adoption standards will preclude future adoption of the foul and surface water sewerage network on site. The design of drainage should ensure that no groundwater or land drainage is to enter public sewers.

Following initial investigations, Southern Water can provide a water supply to the site. Southern Water requires a formal application for connection and on-site mains to be made by the applicant or developer. We request that should this application receive planning approval, the following informative is attached to the consent:

"A formal application for connection to the water supply is required in order to service this development. Please contact Southern Water, Sparrowgrove House Sparrowgrove, Otterbourne, Hampshire SO21 2SW (Tel: 0330 303 0119) or www.southernwater.co.uk".

Southern Water (Second Response)

"Further to our correspondence dated 21st August 2017 regarding the above planning application. I am writing to confirm that the developer has submitted an application to effectively drain the proposed development site without detriment to existing customers within the area.

The agreed solution for the development specified above will see a new wastewater pumping station (WPS) being constructed at the development site, to our approved design, by the developer's contractors. This will link into our existing wastewater network (see below for further detail) via a pumped rising sewer main, or pipe, which will also be built to our approved design by the developer's contractors. It is important to note that the flows that leave the development site via the new WPS and rising main will be foul only - i.e. what residents dispose of via their kitchen and bathroom facilities and not any surface water run off.

The WPS will also be equipped with variable speed pumps, which will pass forward a maximum flow rate of 21 litres per second. Any flows over and above this level will be stored at the WPS until they can be safely passed forward into the wider sewer network. This means that foul flows from the development site can be closely controlled.

The above approach is based on the findings of a detailed technical assessment, which was conducted on the premise that, as a minimum, existing customers must not suffer any deterioration in service due to additional flows from the development site entering the existing wastewater system. The assessment work includes carrying out extensive computer modelling of wastewater flows based on data gathered via flow monitors placed in the existing local sewer network and taking into account expected additional flow levels from the development site.

The new rising sewer main will connect into our public wastewater network in Barfield Park / North Farm Road, just north of where our existing rising main crosses south under the railway line. From here, flows will be conveyed to our Old Salts WPS and then onto our East Worthing Wastewater Treatment Works. As part of the technical assessment mentioned above, we have established that our existing rising main will not need any upgrade to enable it to handle additional flows from the development site. Equally, no additional flow storage will be required at Old Salts WPS. However, as part of the agreed solution with the developer, we will be upgrading the station's pumping system, meaning it will be able to pass forward an additional 26 litres per second, over and above its current capacity.

In due course, we would look to adopt the new WPS (at the development site) and its associated rising sewer main as part of our public wastewater system, typically following the infrastructure being in operation for 12 months to prove its suitability for adoption.

Therefore, foul water capacity would be available to service the proposed development site, once the above scheme is implemented. I trust this letter clearly sets out our position on this matter."

Southern Water (Third Response)

"The applicant should demonstrate that the proposed construction of the Northern Surface Water Pumping Station and Outfall will maintain the 6 metres stand-off distance from public water apparatus and maintain 24/7 access to Southern Water land.

In order to protect water apparatus, Southern Water requests that if consent is granted, a condition is attached to the planning permission. For example, "The developer must advise the local authority (in consultation with Southern Water) of the measures which will be undertaken to protect the public water apparatus, prior to the commencement of the development."

Please find attached a plan of the water main records showing the approximate position of a public water trunk main and distribution main within access to the site. The exact position of the public water mains must be determined on site by the applicant before the layout of the proposed development is finalised. All existing infrastructure, including protective coatings and cathodic protection, should be protected during the course of

construction works. No excavation, mounding or tree planting should be carried out within 6 metres of the public water mains without consent from Southern Water.

The impact of any highway or access roads works on public water and sewerage apparatus shall be assessed and approved in consultation with Southern Water under NRSWA enquiry.

Please note that any watercourses shall be located no closer than 5 metres from public or adoptable sewers or water apparatus.

All our other comments in our previous response letter remain unchanged and valid for the amended details.”

West Sussex County Council – Section 106 Consultation Response

Without prejudice to the informal representations of the County Council in respect of the above planning proposal, I am writing to advise you as to the likely requirements for contributions towards the provision of additional County Council service infrastructure, other than highways and public transport that would arise in relation to the proposed development.

The basis for my advice is contained in the adopted Supplementary Planning Guidance document “The Provision of Service Infrastructure Related to New Development in West Sussex – Part 1. The planning obligation formulae below are understood to accord with the Secretary of State’s policy tests outlined by the in the National Planning Policy Framework, 2012.

The advice is as follows:

School Infrastructure Contribution

The Director for Children and Young People’s Services advises that it appears that at present primary, secondary and further secondary schools within the catchment area of the proposal currently would not have spare capacity and would not be able to accommodate the children generated by the assumed potential residential development from this proposal.

We will require 1 hectare of land to accommodate a 1-form entry primary school, with additional land for expansion to 2-form entry in the future in accordance with Policy 5 of the submitted Adur Local Plan, plus a financial contribution calculated in line with the Adur Infrastructure Delivery Plan October 2016.

The secondary education contributions generated by this proposal shall be spent on a project to expand either Sir Robert Woodard Academy or The Shoreham Academy should the expansion of Sir Robert Woodard Academy not take place.

The sixth form education contributions generated by this proposal shall be spent on a project to expand either Sir Robert Woodard Academy Sixth Form or The Shoreham

Academy Sixth Form should the expansion of Sir Robert Woodard Academy Sixth Form not take place.

We will require land and contributions for the provision of a 30-place day care nursery in line with the Adur Infrastructure Delivery Plan October 2016.

Library Infrastructure Contribution

The County Librarian advises that the proposed development would be within the area served by Lancing Library and that the library would not currently be able to adequately serve the additional needs that the development would generate.

However, a scheme is approved to provide additional floorspace or facilities at the library. In the circumstances, a financial contribution towards the approved scheme would be required in respect of the extra demands for library services that would be generated by the proposed development.

Financial Contribution

The financial contribution sought by the County Council would be based on: the estimated additional population that would be generated by the proposed development, reduced to reflect any affordable dwellings (by which we mean Social Rented dwellings, but NOT Shared Equity, Intermediate or Key Worker status dwellings) for occupation by persons already residing in the library's catchment area; the County Council's adopted floorspace standard for library provision; and the estimated costs of providing additional library floorspace. As the housing mix is not known at this stage, I propose the insertion of a formula into any legal Agreement in order that the library contribution may be calculated at a later date.

The contributions generated by this proposal shall be spent on expansion of facilities at Lancing Library.

Fire & Rescue Service Infrastructure

Fire Stations

The County Fire Officer advises that a financial contribution from the proposed development towards the cost of fire and rescue infrastructure, principally fire stations and services serving the area within which the proposal stands, would be required. This is necessary due to proposed development in the Southern division and the resultant need to improve service provision across the area. The proposed development should proportionately contribute towards the cost of necessary infrastructure needed to support development.

Financial Contribution (excluding provision of fire hydrants)

The financial contribution sought by the County Council would be based on: the estimated additional population that would be generated by the proposed development, reduced to reflect any affordable dwellings (by which we mean Social Rented dwellings, but NOT

Shared Equity, Intermediate or Key Worker status dwellings) for occupation by persons already residing in the fire service provision area; the County Council's adopted standards of fire service cover provision; and the estimated costs of providing additional fire stations. As the housing mix is not known at this stage, I propose the insertion of a formula into any legal Agreement in order that the fire service contribution may be calculated at a later date.

Fire and Rescue Service Contribution to be used towards the re-development or re-location of fire stations and associated vehicles and equipment in West Sussex Fire Rescue Services Southern Area serving Lancing.

West Sussex County Council Ecologist

There is no ecological objection subject to the imposition of appropriately worded condition securing all proposed mitigation, compensation and enhancement and their monitoring and remediation, as appropriate, and as detailed in Chapter 11 of the ES and its supporting technical appendices.

Comment

There is no ecological objection to the proposed development subject to the correct implementation of the proposed mitigation and enhancement as detailed within the Environmental Statement and supporting appendices.

Whilst the bat survey was undertaken very late in the season notably no potential, roosts were identified. The potential detrimental impact of lighting on sensitive receptors such as wildlife has been addressed and appropriate mitigation proposed.

Badgers use the site for foraging and during the construction phase this would be disrupted, suitable mitigation has been put forward to manage the 'off-site' sett.

Three species of reptile are recorded within the application boundary. A suitable mitigation/translocation strategy has been forward.

I am satisfied that there are no other protected species are likely to be unduly affected.

Recommended condition - Ecology

The development shall be implanted only in accordance with mitigation, compensation and enhancement package as proposed with Chapter 11 and supporting technical appendices; prior to the start of development or preparatory works an implementation, monitoring and remediation scheme for all mitigation, compensation and enhancement as proposed within the same shall be submitted to the LPA for approval.

Reason: In accordance with NPPF 118 and Pt. 6 of the Environmental Impact Assessment Regulations 2017"

West Sussex County Council Archaeology

“RECOMMENDATION: No objection is offered to the proposals, subject to suitable heritage asset mitigation measures (archaeology, historic buildings and structures, scheduled monument).

POLICIES: National Planning Policy Framework, paragraph 141 (Conservation of the Historic Environment); Adur Local Plan (Adopted December 2017) Policy 17 (The Historic Environment: archaeological features).

These measures should be provided for through the use of three suitable planning conditions, as follows:-

Planning Condition (Archaeology)

No development shall be carried out on the land until the applicant or their agents or successor in title has secured the implementation of a programme of archaeological mitigation works in accordance with a written Archaeological Mitigation Strategy and timetable which have been submitted to and approved in writing by the Local Planning Authority.

The following heritage assets listed in the Environmental Statement Appendix 12.3 (Archaeology and Cultural Heritage Impact Assessment report) will be recorded:

- (a) HA001 (Shoreham Airfield dome trainer).*
- (b) HA025 (Over blister hangar).*
- (c) HA 027 (Daniel's Barn).*
- (d) HA 050 (World War II pillbox).*
- (e) HA 058 (World War II Type 24 pillbox).*
- (f) HA 061 (World War II field gun emplacement).*

Reason: In order to ensure that archaeological and built heritage assets on the site will be properly recorded before their removal reduction or alteration during development.

Planning Condition (Conservation Management Plan – Shoreham Airfield dome trainer scheduled monument)

Within one calendar year of the date of this planning permission a written Conservation Management Plan for the Shoreham Airfield dome trainer scheduled monument will be submitted to and approved by the Local Planning Authority.

Reason: In order to ensure the conservation and enhancement of the scheduled monument.

Planning Condition (landscaping scheme - Shoreham Airfield dome trainer scheduled monument)

No development shall be carried out on the land until details of a landscaping and ground improvement scheme for the vicinity of the Shoreham Airfield dome trainer Scheduled Monument has been submitted to and approved by the Local Planning Authority.

Reason: In order to ensure the carrying out of the proposed re-landscaping and ground improvement works (Shoreham Airfield dome trainer) referred to in paragraphs 12.5.3 and 12.6.8 of the Environmental Statement (Chapter 12, Archaeology and Heritage).

SUMMARY:

- The comments below relate to designated and non-designated archaeological and built heritage assets within the red line boundary of the application area; they do not take account of built heritage assets outside the red line boundary.
- Detailed comments and recommendations concerning the archaeological implications of this development were set out in West Sussex County Council's (WSCC) response to consultation (archaeology) dated 19th September 2017.
- Only those revisions to the proposals that may have archaeological impacts are addressed in the present response to re-consultation (amended plans).
- Archaeological mitigation proposals regarding a revision to the alignment of Watercourse 6, north of the northern outfall, are acceptable.
- **NB** - this revised watercourse alignment is shown on some of the submitted drawings (see comments on Watercourse 6 below) but not on the submitted Master Plan.
- No objection is raised to the erection of the proposed "saltern hillocks" in the Country Park, over the identified sites of former medieval saltern (salt working related) mounds.
- The opportunity for enhancement of the medieval saltern mounds is recommended, through provision of an information board about them, to be located on top of one of the taller hillocks.
- No change is made to previously expressed recommendations for archaeological mitigation measures regarding: the wartime Dome Trainer Scheduled Monument and related intended Conservation Management Plan, buried channel of the River Adur, land west of Mash Barn Lane, the Daniel's Barn and wartime blister hanger standing structures, and standing wartime anti-invasion defence structures.
- The proposed precautionary archaeological watching brief on new groundworks for cycleway construction north of the A27, in the vicinity of once visible wartime anti-aircraft earthworks, is noted, and drawn to the attention of the South Downs National Park Authority's archaeological advisers.
- All archaeological mitigation measures should be set out in the proposed Archaeological Mitigation Strategy document.
- The proposed Archaeological Mitigation Strategy document and Conservation Management Plan (dome trainer Scheduled Monument), and previously requested details of a detailed landscaping and drainage scheme for the environs of the dome trainer Scheduled Monument should be provided for through the use of suitable planning conditions (three archaeological planning conditions in all, as recommended above).

COMMENTS:

The comments below relate to designated and non-designated archaeological and built heritage assets within the red line boundary of the application area; they do not take account of built heritage assets outside the red line boundary.

Detailed comments and recommendations concerning the archaeological implications of this development were set out in West Sussex County Council's (WSCC) response to consultation (archaeology) dated 19th September 2017. Only those proposed revisions to the proposals that may have archaeological impacts are addressed here.

Revisions to the June 2017 proposals which may have impacts upon archaeological and built heritage assets are set out in the submitted document Further Information to the Environmental Statement (Volume 1 – Main Text) (FIES), Chapter 12 (Archaeology and Heritage). The newly submitted Design and Access Statement also includes proposals relevant to buried medieval salt working sites (6.6).

Watercourse 6

In November 2017, WSCC were asked by the applicant's heritage consultants for archaeological comments on a proposed revision of the alignment of Watercourse 6, to the north of the northern outfall structure (FIES 12.2.4, correspondence in full in FIES Appendix 12.1).

The proposed realignment, a short length of channel replacing a two-sided loop of channel nearer the River Adur, is shown on Drawings 2251 (Rev. E) (Northern Outfall General Arrangement) and 2252 (Rev. B) (Adur Tidal Walls General Arrangement), but is not shown on the newly submitted Master Plan (Drawing L(00) 011 (Rev. U)), nor on the Site Plan (Drg. L(00) 016 (Rev. H)).

The realigned channel would cut through an earthen bank thought to be of World War 2 date, and adjacent slab foundations of a wartime pillbox fortification and adjoining anti-aircraft machine gun position (FIES, 12.2.2). The visible remains of these structures have already been fully recorded.

The applicant has accepted WSCC's recommendation that the archaeological impact of the realignment should be mitigated by means of an archaeologist's watching brief over the excavations, so that any further below-ground remains associated with the visible structures, or presently unknown wartime or earlier features, will be recorded before their removal.

NMU link cycleway

Reference is made in the FIES (12.2.5 – 12.2.8) to the provision of a pedestrian footpath and cycleway along the north side of the A27, within the existing wide verge (the NMU link). This section of cycleway would be linked to the similar proposal between the River Adur and Messrs. Ricardo's premises, within the red line boundary of this planning application.

The section of cycleway north of the A27 is stated to lie within the boundary of the South Downs National Park. It would overlie part of the site of a wartime anti-aircraft obstruction formerly visible as earthworks, but which was probably largely removed within the highway boundary during construction of the A27 Shoreham Bypass in the 1970s.

The proposed precautionary archaeological watching brief on new groundworks for cycleway construction, in the vicinity of the former earthworks, is noted (FIES 12.2.8) and drawn to the attention of the South Downs National Park Authority's archaeological advisers.

Country Park: "saltern hillocks"

It is proposed to erect "saltern hillocks" up to 2 metres high within the intended Country Park, on the identified locations of known former medieval salterns (salt working mounds) (Design and Access Statement, 6.6).

The largest and tallest of these hillocks would have steps up, and what appear to be seats on the top, on Country Park Illustrative Masterplan 01 (Drg. HED-1172-LA-002-Rev. 01), above the sites of saltern Heritage Assets 39 and 47. Four lower mounds, without steps or seats, are shown on the same plan, above the sites of saltern Heritage Assets 32, 33, 37, and 44.

Four more low hillocks would be located between the IKEA and Travellers' sites, not on any known sites of medieval salterns.

No objection on archaeological grounds is raised to the "saltern hillock" proposals, subject to the archaeological mitigation previously recommended by WSCC in the September 2017 consultation response, i.e. where these and others of the known former salterns may be affected by these revised Country Park landscaping proposals: -

before the start of any cut and fill works on the site, exploratory test pits are excavated carefully (under the direction of an archaeologist) through the landfill at the locations of the above saltern mounds, in order to measure accurately the locations of the tops of the saltern mounds, and so accurately assess the degree of impact of cut-and-fill proposals. Where the proposals unavoidably would involve reducing the buried saltern earthworks preserved below the landfill, these should be fully investigated and recorded.

The proposed hillocks also offer an opportunity for enhancement of the medieval salt working related earthworks which they will cover, as an additional element of the proposed Archaeological Mitigation Strategy.

It is recommended that an information board is placed on the top of one of the two tallest hillocks, positioned to look across the Airport towards the River Adur, and briefly explaining the locations, history and function of the cluster of saltern mounds that were once visible here.

Other archaeological impacts

West Sussex County Council's comments of September 2017 upon other archaeological considerations remain unchanged – i.e. the wartime Dome Trainer Scheduled Monument and related intended Conservation Management Plan, buried channel of the River Adur, land west of Mash Barn Lane, the Daniel's Barn and wartime blister hanger standing structures, and standing wartime anti-invasion defence structures, and appropriate mitigation measures.

All archaeological mitigation measures should be set out in the proposed Archaeological Mitigation Strategy document, to which one of the recommended archaeological planning conditions refers.

Planning Conditions

Planning Conditions attached to these proposals should include (three separate conditions):-

- Requirement for an Archaeological Mitigation Strategy (historic building recording and below-ground archaeological works)*
- Requirement for a Conservation Management Plan (dome trainer Scheduled Monument)*

Requirement for a detailed landscaping and drainage scheme for the environs of the dome trainer Scheduled Monument.

West Sussex County Council have also provided pre-application archaeological advice in reply to a request from PCA Heritage (29th September 2016 and December – January 2017).

Designated Heritage Assets - Scheduled Ancient Monument

Within the site's Red Line boundary is the Shoreham Airfield Dome Trainer Scheduled Monument (National Heritage List no. 1005818), built during World War 2 and used in 1943 and 1944 to train anti-aircraft gunners (A & CHIA 3.2.1, HA001).

The setting of the Dome Trainer (but not the monument itself) would be affected by the proposals, in that the new airport access road would separate it from Shoreham Airport (ES Vol. 1, Main Text, 12.5.8), and in the building of the realignment of Watercourse 6. But since the Dome Trainer was built as a training structure, not as one of the numerous anti-invasion or anti-aircraft wartime defences of the airport, this separation would not be a serious adverse impact on the Dome Trainer's setting.

Other impacts upon the dome trainer's setting are discussed, such as the relocated travellers' site and lighting of the new A27 roundabout, but the dome did not rely on external darkness to function, and the former would be one of several successive travellers' sites here. These impacts are reasonably not considered to be major.

In compensation for all of the above impacts, improvements to the setting and physical condition of the Dome Trainer are proposed. These would involve the preparation by the applicant of a Conservation Management Plan for the dome trainer, in consultation with Historic England, West Sussex County Council and Adur District Council, the provision of external interpretation information, and public access to the close vicinity of the scheduled monument by a new footpath (ES, Vol. 1, 12.6.8).

In addition, proposed re-landscaping of the ground around the Dome (ES, Vol. 1, 12.5.3; A & CHIA, 3.1.12), would be intended to alleviate the present wet ground conditions there, caused by the monument's location in a bowl or sump, surrounded by raised ground.

Overall, the balance of the above negative and positive impacts upon the setting of the scheduled monument balance as a strong positive impact.

However, it should be noted that the submitted General Arrangement Plan (North-East) and Sections plan 05 for the Country Park do not show any clear indications of intended ground reduction in the vicinity of the dome trainer, that would alleviate the drainage problem around the dome trainer.

Therefore detailed plans of the proposed re-landscaping and ground improvements in the vicinity of the scheduled monument are required.

Non-designated Heritage Assets - impacts

Saltern mound earthworks

When the greater part of the site was raised, using imported landfill material, for construction of a golf course, special measures were taken to ensure the protection of the low earthworks of medieval saltern mounds, related to medieval salt working.

These mounds were not stripped of topsoil but carefully covered over, and should still exist intact below the existing landfill, but at a higher level than that of the surrounding topsoil-stripped ground surface, and so buried under a thinner layer of landfill material.

In the A & CHIA, care has been taken to assess, from the proposed cut and fill isopachytes, those of the known saltern mound earthworks which may potentially be adversely affected by the Country Park, residential, retail and school landscaping and construction proposals. These are Heritage Assets HA028, HA029, HA030, HA031; HA035, HA036, HA037, HA038; HA040, HA041, HA045, HA046, and HA048 (A & CHIA, 3.29 – 3.49).

It is recommended that before the start of any cut and fill works on the site, exploratory test pits are excavated carefully (under the direction of an archaeologist) through the landfill at the locations of the above saltern mounds, in order to measure accurately the locations of the tops of the saltern mounds, and so accurately assess the degree of impact of cut-and-fill proposals.

Where the proposals unavoidably would involve reducing the buried saltern earthworks preserved below the landfill, these should be fully investigated and recorded.

Buried channels of the River Adur

The submitted document, A Geoarchaeological Deposit Model of the River Adur, New Monks Farm, West Sussex (GDM report), provides an assessment of the archaeological potential of those deeper geological deposits on the site, associated with late Ice Age, later prehistoric and subsequent silted-up channels of the River Adur. The submitted drawing Geological sections – Access Road, for the land south of the proposed retail store, is also relevant.

The deep silts of the buried river course comprise largely sand and silt deposits, the thick sand deposit being the earlier and deeper. These deposits potentially contain microfossils and pollen which can provide information about changes to the river environment over time during the prehistoric and later periods, e.g. from an inlet of the sea to tidal flats at times closed off from the sea by shingle spits, linked in part to human land use of the upper river.

The deepest (20 metres plus) central channel of the course of the silted-up prehistoric River Adur lies to the east of the proposed Country Park, below Shoreham Airport. It would be crossed by the new Airport Access Road, which would affect the upper silt deposits only minimally.

The Country Park, access road, airport access road and retail store car park would ride above the buried river channel, and so have no or minimal effect upon its silts.

The proposed retail store would sit upon the shallower part (still almost 10 metres deep) of the buried ancient river channel. If the foundations of the retail store are piled, they will cut through the upper silts of the channel here, as would the piled foundations for the proposed Highway Bridges HW01 and HW02.

These and other deeper impacts upon the buried river silts should be mitigated by means of a geoarchaeological element to the proposed Archaeological Mitigation Strategy (see below).

Land west of Mash Barn Lane

Presently unknown buried archaeological features may exist within the proposed Phase 1 development, west of Mash Barn Lane, not lying beneath landfill. Unfortunately, surface ground conditions are too poor to allow to geophysical survey of the site, attempted in 2016.

Therefore this area will require exploratory archaeological investigation (by excavation of trial trenches), prior to the beginning of any landscaping, infrastructure and house construction; followed by detailed or wider-scale investigation and recording, should significant archaeological features be revealed.

Historic buildings

The proposals would involve major adverse impacts (demolition) upon a wartime aircraft blister hangar, dating to 1941 (A & CHIA, HA025), and Daniel's Barn (A & CHIA, HA027),

a now rather overgrown timber-framed barn to the south of Old Monks Farmhouse, dating probably to c. 1800. Proposed mitigation for their demolition reasonably involves historic building recording before their dismantling.

This mitigation should also involve, for Daniel's Barn, monitoring by a historic buildings archaeologist of its demolition, in order to be able to record details of construction that may not presently be accessible, e.g. carpenter's marks; and below-ground archaeological investigation and recording, in order to observe and record any buried features that might relate to earlier phases of barn construction.

Standing wartime anti-invasion defence structures

Referred to in the A & CHIA are Heritage Assets HA058 (World War 2 Type 24 pillbox) and HA061 (field gun emplacement), located to the north and west of the proposed Outfall structure adjoining the River Adur, and adjacent to Watercourse 6. These are referred to in the Adur Tidal Walls approved scheme as monuments MM209 and MM208 respectively.

These two monuments would be left untouched by the Adur Tidal Walls scheme, and would not be demolished as part of the present proposals. But under the present proposals, the widening and realignment of Watercourse 6 would leave both structures perched on the very edge of the top of the new and re-graded Watercourse 6 bank profile.

In these locations, the leading edges of both structures may be at risk of undermining and structural instability from long-term bank erosion. Neither structure has previously been fully recorded, e.g. as part of the Adur Tidal Walls scheme, because under that scheme they would have been unaffected.

Their retention under both the Adur Tidal Walls Scheme and the present proposals is welcomed. However, in view of the potential long-term impact of the proposals upon these structures it is strongly recommended that engineering works to prevent erosion of the bank below the edges of the two structures are carried out, e.g. in the form of retaining walls.

Before any works associated with the watercourse take place, these two structures should receive a full archaeological record.

A third wartime Heritage Asset, another pillbox (HA050), located in the hedge on the east side of the proposed relocated traveller's site, would occupy a constrained location, as it does now, between watercourses. The westernmost of these watercourses would either be retained or removed (Fig. 11.6 Fate of Watercourses Plan (removed); cut and fill plan (filled); the Country Park General Arrangement Plan (retained (?))). The pill box would apparently be located in an area of new landscaping.

Clarification is needed as to whether this pillbox would be affected by new landscaping, as suggested in the A & CHIA, para. 3.51.2. Because of its presently semi-concealed location, it is strongly recommended that this pillbox is fully exposed within the hedge, at the appropriate time of the ecological calendar, and fully recorded. Its retention in situ is also strongly recommended.

Non-designated Heritage Assets – impacts – conclusions

None of the above non-designated heritage assets are of equivalent significance to designated heritage assets of national importance, such as to require major modifications to the proposals.

Accordingly, the impacts upon these Heritage Assets may reasonably be addressed through proportionate mitigation measures.

Archaeological Mitigation Strategy

In order to address the expected archaeological impacts of the proposals at the Construction Stage, an Archaeological Mitigation Strategy (AMS) has been proposed (ES, Vol. 1, Main Text, Chapter 12 (Archaeology and Heritage), paras. 12.6.1 – 12.6.5).

The proposed content of the AMS includes the historic (standing) building recording of Daniel's Barn, the Over Blister Hangar (both to be demolished), and pill box HA050 adjacent to the intended Travellers' site.

In addition, the AMS should include provision for archaeological investigation of the ground below Daniel's Barn, following demolition of surface structures.

Field evaluation techniques (including exploratory trenches) are proposed in respect of potential impacts upon saltern (salt-working related) mounds which may be affected by landscaping and other works (ES, Vol. 1, 12.6.1, 12.6.3, 12.6.4), and geoarchaeological deposits (e.g. the buried silts of the River Adur).

These evaluation techniques would inform the definition of areas of targeted archaeological excavation, monitoring and control of construction works, and purposive geoarchaeological boreholes (for the purpose of sampling and analysis of deposits at risk from construction impacts) (12.6.4).

The AMS should also include provision for the historic building recording of wartime pillbox HA058 and field gun emplacement HA061 (north-west of the river outfall structure), and an engineer's assessment (and if required implementation) of the need for retaining structures to be built in Watercourse 6, in order to ensure their structural stability. Both of these structures would become perched on the very edge of the top of the bank of the new Watercourse 6.

Conservation Management Plan

The proposed Conservation Management Plan for the wartime dome trainer Scheduled Monument (ES, Vol. 1, 12.6.8) (Operation Phase) is welcomed. This should include details of the proposed external information materials (e.g. an interpretation board), a historic building survey of the standing dome trainer, and include in its Appendices the Heritage Assessment report of Brighton City (Shoreham) Airport, prepared for Adur District Council by Acta (heritage and landscape consultancy), because of its historical detail regarding the monument (report dated 2016; A & CHIA, 3.2.1).

Planning Conditions

Planning Conditions attached to these proposals should include (three separate conditions):-

- Requirement for an Archaeological Mitigation Strategy (historic building recording and below-ground archaeological works)*
- Requirement for a Conservation Management Plan (dome trainer Scheduled Monument)*
- Requirement for a detailed landscaping and drainage scheme for the environs of the dome trainer Scheduled Monument.”*

West Sussex County Council as Lead Local Flood Authority (LLFA)

- 1. “A formal response is being sought from West Sussex County Council as Lead Local Flood Authority (LLFA) to the above planning application. Consistent with earlier correspondence on this proposal (Reference B) This letter sets out the LLFA’s current position on two key questions:*
 - Has the Applicant demonstrated that development will not increase flood risk elsewhere?**and*
 - Is the Drainage Approach consistent with National and local flood risk policy?*
- 2. West Sussex County Council, in its role as the Lead Local Flood Authority, with enforcement responsibility for ordinary watercourses; and as a statutory consultee of the planning process, has a responsibility to improve the ordinary watercourse network to meet the Water Framework Directive targets for water quality and ecological objectives. WSCC as LLFA will therefore provide comment where drainage development proposals have potential to impact on water quality of a receiving ordinary watercourse.*
- 3. To ensure a clear audit trail, this letter will refer to the concerns in our earlier response (Reference B) and the new evidence that has been provided to address these concerns.*
- 4. In consideration of both the scale of the proposed development at New Monks Farm and the complexity of flood risk issues associated with the drainage catchment; the LLFA, jointly with Adur-Worthing Council, commissioned McCloy Consulting to undertake an independent appraisal of the Flood Risk Assessment (FRA) and proposed drainage strategy for the development. The review was undertaken by Anthony McCloy, and Kyle Somerville, who are both suitably qualified Chartered Engineers. This independent review is complete and the reviewers have concluded that the additional information provided through the review process has addressed the outstanding concerns in relation to the statutory obligation for an applicant to demonstrate via an FRA that flood risk will not be increased elsewhere.*

5. Has the Applicant demonstrated that development will not increase flood risk elsewhere?

5.1 *The LLFA is now in receipt of a Technical Memorandum undertaken by McCloy Consulting (Enclosure 1) that contains the following statement.*

In relation to the key planning test of potential for the proposal to cause any increased flood risk to lands upstream of Mash Barn Lane:

i. The revised hydrological / flow estimate tends to permit weight to be given to the design and outcomes of the applicant's existing hydraulic assessment.

ii. Clarifications in relation to comparison of Lancing Ditches outlet versus equivalent culverts at the Northern Channel outlet ensures that there is confidence that the proposal can cause no new or greater backwater effect that would extend to Mash Barn Lane and upstream.

iii. The proposed pumped outlet, over and above the like for like gravity culvert discharge for the Northern Channel is likely to offer a further beneficial effect to Mash Barn Lane, and

iv. The proposed upgrade to the existing Mash Barn Lane culvert can have no adverse effect that would cause any increased flood risk upstream.

Potential for the proposal to affect upstream lands can therefore be deemed to have been suitably assessed and the application can be deemed to satisfy the planning test in relation to potential effect elsewhere.

5.2 *The LLFA is in agreement with the conclusion of the independent review of the FRA. The LLFA is therefore now satisfied that the applicant has demonstrated that flood risk will not be increased elsewhere through the supplementary information that has been provided.*

5.3 *For completeness, the concerns identified by the LLFA in June 2017 in relation to flood risk (Reference B) and the evidence provided to address those concerns is provided in Annexe A.*

6. Is the Drainage Approach consistent with national and local flood risk policy?

6.1 *This matter was discussed at length in Reference B and the position is essentially unchanged.*

6.2 *The LLFA has accepted that, from a flood risk perspective, the proposed diversion of flows formerly entering the Lancing ditches into a new Northern Channel with a pumped discharge provides a solution that will not increase flood risk elsewhere.*

6.3 *The proposal, however, diverges from both national and local policy in the instances set out below.*

6.4 *Paragraph 103 of the NPPF states: When determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere and only consider development appropriate in areas at risk of flooding where, informed by a site-specific flood risk assessment following the Sequential Test, and if required the Exception Test, it can be demonstrated that:...*

- *development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and it gives priority to the use of sustainable drainage systems.*

6.5 *Paragraph 109 of the NPPF states: The planning system should contribute to and enhance the natural and local environment by:*

- *preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability;*

In the context of the New Monks Farm Development, treatment of diffuse pollution within rainfall run-off delivered through sustainable drainage is considered to be the preferred means of preventing diffuse pollution entering the receiving ordinary watercourse.

6.6 *National policy set out in the NPPF and referred to above is reflected in the Local Plan policies which apply to the application, extracts of which are included below:*

- *Policy 35: Water Quality and Protection
Development will be permitted provided that:*

It does not have an unacceptable impact on the quality and potential yield of local water resources and the water environment; also

It protects and enhances groundwater, surface water features and controls aquatic pollution to help achieve the objectives of the Water Framework Directive

- *Policy 36: Flood Risk and Sustainable Drainage
Substantial storage through SuDS will be required to achieve a reduction in runoff to levels below that experienced prior to development.*

6.7 *Planning Practice Guidance states: New development should only be considered appropriate in areas at risk of flooding if priority has been given to the use of sustainable drainage systems. Additionally, and more widely, when considering major development, as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015, sustainable drainage systems should be provided unless demonstrated to be inappropriate. (Paragraph: 079 Reference ID: 7-079-20150415).*

6.8 *The degree of adherence to Planning Practice Guidance on provision of sustainable drainage for the residential site by the applicant is disappointing stemming in part*

from a different (and in the LLFA's view erroneous) interpretation of the 2015 SuDS Manual (C753).

6.9 *The philosophy of SuDS is clearly set out in the 2015 SuDS Manual (C753) that defines SuDS as: an interconnected system designed to manage, treat and make best use of surface water, from where it falls as rain to the point at which it is discharged into the receiving environment. The receiving environment in the case of The New Monks Farm development is the Lancing ditches and new Northern Channel which are classified as ordinary watercourses.*

6.10 *In response to a query regarding treatment for surface water run off for the residential development, the applicant provided a document: Further Comments on FRA Addendum and Additional Work – dated 12 January 2018 containing the following statement.*

The area of the Lancing Ditches north of the New Monks Farm Culvert currently provides storage and treatment for the upstream residential and highway catchment including areas of runoff from the A27 Trunk road.

The on-site Lancing Ditches are being enhanced and will remain as both watercourses and a wetland habitat and will continue to provide storage and water quality treatment.

None of these definitions negate the other.

The full use of the ditches for these purposes solely for the catchment of the proposed residential development site has always been the premise of the Flood Risk Assessment.

The closest classification of the Lancing Ditches as set out in The SuDS Manual C753 2015 is a wetland.

6.11 *The LLFA considers that above statement and Section 6 of the FRA Addendum which is attached to the planning application erroneously interprets that the ordinary watercourses can form part of the mitigation prior to discharge to the receptor (watercourse or groundwater) as outlined by the SuDS Manual, if the watercourses are also defined as the receptor. Furthermore, the fact that contaminated run-off enters the ditch system from the A27, should not influence adherence to pollution control standards for a new residential development; to do so would be contrary to the principles of the Water Framework Directive.*

7. Conclusions

7.1 *The LLFA accepts the findings of the FRA provided in support of the New Monks Farm Development in that the proposed development will not increase flood risk elsewhere. Notwithstanding this review undertaken by the LLFA, the responsibility for the accuracy, acceptance of the flood risk and drainage assessment and implementation of the proposed flood risk measures rests with the developer and their professional advisors.*

7.2 *The LLFA expresses residual concerns with regard to management of water quality prior to discharge to the receiving ordinary watercourse for the residential area of the development. A quantitative assessment has been requested from the Applicant to*

demonstrate the treatment performance of the proposed drainage prior to discharge. No documentation has been received to address this concern. Drainage design for the school and commercial areas of the site are noted to be subject to detailed design. Notwithstanding this residual concern, the LLFA considers that the drainage design can be developed as part of the detailed design process to meet current policy and legislative requirements. The LLFA would therefore seek to condition any planning approval, such that detailed drainage design is approved jointly by the LPA and LLFA (which will have regard to relevant planning policies and legislation) prior to commencement of each part respective of the site.

- 7.3 *It is recommended that the following conditions in relation to flood risk, drainage and water quality are attached to any planning approval, should the LPA be minded to grant planning permission for the New Monks Farm application site.*

Condition

Development will not commence until an updated watercourse maintenance plan has been provided that incorporates:

- a minimum access strip of 3m width that will allow access to all areas of watercourse for the purposes of maintenance;*
- Formation certificate for the Surface Water Management Company (paragraph 13.5 of the FRA).*

Justification:

When planning a sustainable drainage system, developers need to ensure their design takes account of the construction, operation and maintenance requirements of both surface and subsurface components, allowing for any personnel, vehicle or machinery access required to undertake this work (Planning Practice Guidance: Paragraph: 085 Reference ID: 7-085-20150323). Paragraph 13.5 of the FRA set out a proposal for Formation of a Surface Water Management Company; achievement of this condition will translate aspiration into delivery.

Condition

No development of each respective part of the site will commence until detailed drainage design for the respective part of the site has been approved jointly by the LPA and LLFA.

Reason

Detailed design and associated calculations should demonstrate adherence to national and local policy on SuDS and Water Environment (Water Framework Directive) (England and Wales) Regulations 2003. Detailed design for all parts of the site should demonstrate that each respective part of the development will not impact upon the receiving ordinary watercourses (which extend within site boundary), prevent WFD status objectives being achieved or prevent status objectives being achieved in any other water bodies.”

The Councils Principal Engineer states that he has no objection to the development on the basis that it should improve surface water flood risk both up and downstream. His consultation response is set out in full below:

'Thank you for the opportunity to comment on this application. The site is almost completely within flood zone 3, and suffers from predicted surface water flooding principally along the routes of existing ditches which indicate potential lack of capacity. Whilst the site itself is not affected to a great degree by groundwater, owing to the fact that the ground level has been raised by importing inert fill, the surrounding area is susceptible to elevated groundwater levels which has previously been associated with flooding to gardens, garages and voids beneath suspended timber floors.

On and off site drainage has been the subject of extensive discussions between the developers, their drainage consultants, WSCC, ADC, and an independent consultant appointed by WSCC and ADC to verify and check the current design proposals.

The foul sewage from the development is to be removed from the site using Southern Water pipework and apparatus and I understand fully the concerns of the local residents that in the event of significantly raised ground water levels, which lead to inundation of some pipes in the system downstream of the site, there may be periods when the capacity of the system is insufficient to take the flow from this development. These concerns arise because of issues within Manor Close and Manor Way and other adjacent areas over recent wet winters, which have resulted in residents being unable to flush toilets without them backing up. Southern Water agreed to investigate and repair private and public pipes in the area in 2012, this tranche of works were never fully completed - resulting in the current concerns of the residents. I note the assurances given in the Southern Water responses.

The site is to be protected from fluvial flooding from the River Adur, both by the New Sea Defence and by a bund built as part of this development that will run from the A27 to the railway line.

The site layout requires several lengths of existing ditch to be infilled, this means both conveyance and wildlife corridors are affected. These two issues have been addressed by the provision of new ditches, the undertaking to infill "lost ditches with gravel and pipes to allow continued drainage if required, and the establishment of new dedicated habitat.

The proposal is to reroute / redirect flows from the west of the site via a new ditch to the north of the development, which will also accommodate flows from Honeymans Hole and will act as a cut off drain for ground water flowing from the north. Water flowing along this ditch will be discharged via a new pumping station into the river Adur. There is a concern that the pumps could fail, however the pumping station will be fed with power from two separate power grids, and will be provided with a standby generator. It is my opinion that work associated with the northern ditch will help reduce pluvial flooding and potentially ground water flooding west of the site.

The site itself will be drained to the local ditches; those ditches which are retained or created will be heavily modified and/or engineered. The IKEA store and school will have surface water flows retained and attenuated from subsurface tanks at slow rates. Roof

drainage from the individual properties and road runoff will all be conveyed to and discharged into the ditches.

Whilst utilisation of infiltration methods would be preferred this is not appropriate in filled soils, as noted by BRE 365 guidance and in the Site investigation report prepared by Soils Limited. The area west of Monks Farm Lane whilst virgin ground has low permeability. The original soakage tests indicated an infiltration rate of approximately 1×10^{-7} m/s. This rate is not sufficient to allow a half drain in 24 hours and will not allow the design to meet current guidance and good practice, so soakaways are not the best option for the site as a whole.

There may be other potential benefits of not utilising infiltration even had an acceptable infiltration rate been achieved: - any soakage into the ground will naturally migrate through the soil to a lower point or into one of the local watercourses. The natural ground on the western boundary of the site is approximately 1m higher than the two green fields to the south of the A27 garden corridor and Manor Close, if surface water infiltration were to migrate to the low points on the superficial deposits overlying the Clay material there is no guarantee that it would automatically migrate east to one of the existing ditches / water courses, it is possible it would migrate west/north to the low points in the Monnery Land/Manor Close which could affect flood risk upstream. This may of course mimic the current flow paths for rainfall on the undeveloped site, therefore its removal could be seen as an improvement to the drainage scenario, which is a requirement for this application under SUDs guidance.

The main site development surface water drains to the Dogs Trust outfall, in dry periods the flows are likely to be less than currently experienced, and during periods of rainfall, may also be less as ground water flows from the west have been diverted, therefore the area to the south of the railway may see an improvement in drainage as a result of this development.

The issue of ground water flows and surface water exceedance flows west of the site has been a significant area of debate. The area west of the site will remain at risk of surface water / ground water flow flooding irrespective of works on the site or the increase in the size of the Mash Barn Lane Culvert, the principal restriction which affects this area is the 600mm culvert under Manor Close – this is not something that can be remedied by on site works.

Overall it is my opinion that the complete scheme should improve surface water flood risk up and down stream. I also consider that the development is unlikely to increase ground water flood risk up or down stream.

Turning now to the reworded application this is effectively for phased development, there is a perceived risk that development could falter or be cancelled part way through leaving only part of the required drainage design constructed.

To overcome these concerns, I would suggest conditions along the following lines.

1 The residential development west of Mash Barn Lane is to start first but the new Mash Barn Lane Culvert the northern channel and the pumping station are installed prior to the occupation of the 100th dwelling.

2 The developer needs to demonstrate using standard methods for run-off and storage calculations that the first phase of 124 houses can be delivered without increasing flood risk elsewhere. The developer will need to demonstrate how they can manage run-off from a 1:100 +40% Climate Change event, without increasing risk of flooding downstream or upstream.

3 The developer should clarify by submission of test results why soakaways are not appropriate west of Mash Barn Lane.

4 The developer shall provide evidence of a management company under whom the maintenance of both the ditches and the pumping station will be undertaken. This evidence shall include details on 24 hour call out arrangement pre / during and post development and shall consider a bond arrangement tied to the BHFC in the event of financial difficulties.

West Sussex Local Access Forum – (Final Response)

I am responding to the above consultation on behalf of the West Sussex Local Access Forum (WSLAF).

West Sussex Local Access Forum (WSLAF) is an independent advisory body, established under the Countryside and Rights of Way Act 2000, to give access advice to local authorities, statutory organisations and non-government organisations. In giving that advice, the Forum's main objective is to ensure the existing network of public rights of way (prows), as well as the wider access network, is protected and where possible enhanced. The Forum has a balanced membership of knowledgeable and experienced users (walkers, cyclists, horse riders and carriage drivers), landowners and other interests (including conservation, disabled access, landscape). For further information about the Forum please visit www.wslaf.org.

We would reiterate our comments in our responses in Feb '16, Sept '17 and Sept '18 and confirm that it is our firm view that this development offers the best possible opportunity for the delivery of a grade separated non-motorised user (NMU) crossing of the A27.

Members are strongly of the opinion that more consideration should be given to the provision of a bridge between Old Shoreham Road and Coombes Road to provide the most direct and convenient crossing that all NMUs are looking for.

The alternative proposed at present, using FP 2049 under the A27, raises serious concerns as to its suitability for all NMUs (walkers, cyclists and equestrians), as it fails to meet current standards for a bridleway regarding height (minimum 3.4m) and width (minimum 3m, preferably 4m for a well-used path).

In addition, with respect to PROW 2049, there is a discrepancy between the legal status of the path described in the 'Summary of Additional Information' and the Drawing referred to in the Summary (VD14260_SK 0101C), which requires clarification.

The Summary refers to a bridleway, which would be available to all NMUs but the width shown of 2.5m would only comply with normal WSCC standards for a walk/cyclepath.

On the drawing the path is described as a Footway/cycleway which would exclude some users notably equestrians. A cycleway would also not be shown on the Definitive Map of Rights of Way. The narrow width of 2.5m may also cause some conflict between users and we have a safety concern over the narrow width (0.5m) between the path and the slope down to the river.

Whatever alternative crossing of the A27 for NMUs is provided, this must be in place prior to the removal of the Sussex Pad traffic lights.

This letter constitutes formal advice from the West Sussex Local Access Forum. Adur District Council is required, in accordance with section 94(5) of the Countryside and Rights of Way Act 2000, to have regard to relevant advice from this Local Access Forum in carrying out its functions.

Public Health and Regulation – Air Quality

This response deals with the air quality assessment contained within Chapter 2 of the Environmental Statement, with conclusions and recommendations set out in Chapter 3.

The air quality assessment was generally carried out to an appropriate standard. A suitable air quality model was used for the study, and except where concerns are highlighted below, the study conclusions were supported by the data presented.

However, a number of issues have been identified and these are listed below:

- 1) An air quality assessment of the impacts from the first phase of the proposed development and then the subsequent phases should be completed, rather than an assessment of the overall scheme.*
- 2) Assessments of traffic impacts on the A259 in Lancing, the Saltings roundabout through to the Norfolk Bridge and the Old Shoreham Road Southwick AQMA must be completed and these must then be used to inform an updated air quality assessment for these areas.*
- 3) Clarification on Road sector contributions and if these have been subtracted from the total background values should be supplied. If Road sector contributions have not been subtracted first, then this must be completed and the air quality impact assessment must be reviewed.*
- 4) The assessment of air quality impacts at the Upper Brighton Road, Worthing AQMA should be reviewed and updated. Road traffic emissions should be modelled at all locations where roadside measurements are available within the Worthing AQMA and the resultant impacts revised.*

- 5) *The cumulative impacts of development on the fringe of Brighton & Hove should be incorporated into the traffic assessments and subsequent air quality impact assessment.*
- 6) *In order to reduce uncertainty, an assessment of operational phase air quality impacts on the Adur Estuary SSSI should be completed.*
- 7) *To provide an indication of overall model performance and confidence, model uncertainty should be quantified using one of the statistical tests recommended in the LAQM TG(16) technical guidance.*
- 8) *If permission is granted for the proposed development, a review of construction phase impacts should be carried out in the light of the comments in this report. Appropriate mitigation measures should be identified and implemented. This process can be carried out as part of the development of a Construction Environmental Management Plan or similar system.*
- 9) *If permission is granted for the proposed development, a scheme of air quality mitigation measures should be developed in consultation with Adur District Council Public Health & Regulation, in which the full identified mitigation sum of £909,000 is invested in measures designed to benefit the area, which are in line with the guidance in the Sussex Authorities 2013 and the list of measures suggested in Section 13 of this response.*
- 10) *To provide confidence in the modelling calculations information on the data capture and hence data quality for the 2015 meteorological dataset should be provided.”*

Air Quality (second response).

Further to my comments of 29th September 2017 I can now provide an update.

The original Environmental Statement (ES) concluded that the proposed and cumulative developments would not lead to significant changes in pollution concentrations at any existing receptors, including those within the declared Air Quality Management Areas (AQMAs), or lead to the exposure of new receptors to unacceptable air quality. Taking into account mitigation measures, the overall impact of the proposed development on air quality (using nationally recognised and commonly used guidance) was concluded to be of negligible significance.

The Air Quality Assessment was generally carried out to an appropriate standard and a suitable air quality model was used for the study. Following several requests for further information, updates to the ES were provided which addressed concerns outlined in my email of 29 September 2017.

The applicant's emission mitigation calculation, carried out in accordance with the guidance contained in the 'Air quality and emissions mitigation guidance for Sussex (2013)' originally identified a full emissions mitigation package of £909,000. Following the publication of the latest Emissions Factor Toolkit in November 2017, a recalculation of the

2027 Emissions Mitigation for the development was undertaken and this reduced the overall mitigation sum to £663,457.

We have now received the developers final list of mitigations. These primarily relate to on-site options which would help target low to zero emission sustainable transport needs. The proposed mitigation exceeds the emissions mitigation calculation value of **£663, 547**. I am however concerned that this list includes travel plan coordinators, which I would argue is something that would be required by WSCC anyway (for what duration I do not know), so is in effect double counted mitigation.

The provision of EV points in some of the garages proposed in the residential development is welcomed, although there are now schemes in Sussex where developers are including passive or full installations for every home. We have pushed for a larger number of ev points, but thus far have been unsuccessful.

The addition into the list of a zero-emission local delivery service (contracted out to IKEA supplier) and zero emission local delivery infrastructure (1x 50/22kW ev hub) is to be welcomed, although I am not sure how in practice this will be implemented, nor if there is an absolute commitment to this. A free local delivery offer (using low emission vehicles) has the potential to have a large beneficial impact on traffic movements and pollution in the local area, so I would recommend this is pursued further, perhaps through the commercial travel plan(s).

It should be noted that the proposed mitigation mainly relates to measures on and immediately adjacent to the development site. The ES concluded negligible impacts off site, therefore whilst we would like to see measures off site related to our air quality action plan added to the list, we are somewhat limited in what mitigation we can seek off site.

Although not mentioned, it is considered reasonable to expect the developers to also include some form of continuous air quality monitoring in connection with the proposed works.

Public Health and Protection – Noise (first response)

"It is Government Policy that LPA's should seek opportunities to protect, improve and enhance the environment, and this requires proper consideration of the acoustic environment around new residential developments and it is in this context I make my comments.

Having reviewed the application I wonder whether some of the acoustic problems highlighted could not be resolved or improved through better acoustic design of the development site. Of particular concern is the school position, the lack of acoustic protection of existing properties along the Old Shoreham Road and the fact that internal noise levels of new residential properties, in excess of 100m from the A27, will not achieve the standards of BS8233:2014 with windows open. It is not good acoustic design to rely on the building envelope to provide acceptable acoustic conditions when other methods could reduce the need for this approach. With regards this last point, I appreciate it would be difficult to control noise from aircraft during the day time, but I am of the view that noise

from the A27 could and should be controlled more adequately either by landscaping or barriers; particularly as during the night it is a significant source of noise in the locality.

Acoustic Design

The Planning Noise Advice Document Sussex sets out the principles of good acoustic design for new residential development. Guidance ProPG: Planning and Noise, Professional Practice Guidance on Planning and Noise. (May 2017) reinforces the principles of good acoustic design for residential development.

ProPG: Planning and Noise, describes an acoustic design process which seeks to deliver the best acoustic design outcome for a particular site. Please note, I recognise that the acoustic planning for this development predates the ProPG guidance by several months. However, given the application to the Council was made after this document was published and in circulation, I feel it is appropriate to consider this guidance in determining this application. I would therefore request that the applicant goes through the ProPG process and publish its evidence and findings for the acoustic design for the development.

A27, Old Shoreham Road

The acoustic report identifies that the existing noise levels in this area are high and the resulting development will have negligible impact on noise levels in the vicinity.

Let me put this in context. The Environmental Noise Directive 2002/49/EC sets out to avoid, prevent or reduce on a prioritised basis the harmful effects, including annoyance, due to exposure to environmental noise from road traffic, rail traffic, air traffic and from sites of industrial activity. The Environmental Noise (England) Regulations 2006 brought the Directive into English Law.

Under this legislation, Environmental noise levels were mapped. Areas where noise needed to be addressed because of public health concerns, the so called important areas, were identified, and homes along the A27, Old Shoreham Road fall within an important area.

The next stage of the process was to get the noise making authority, this was Highways England for the A27, to prepare a scheme to improve the noise environment or as a last resort improve the properties affected by noise. Highways England, in carrying out its responsibility in this locality recommended low noise surfacing for the road. Noise barriers were not proposed because Highways England were of the view that it was likely that there would be site constraints identified during the investigation process from which it was concluded that it would be difficult/extremely costly to install and maintain a noise barrier. I did not agree with this conclusion, but regrettably, there was no requirement in the legislation for them to take the Councils consultation response any further.

Road noise is made up of two main components; tyre noise and engine noise. At high speeds, the noise of tyres on the road is the greatest source. At low speeds, engine noise is more important. Body noise made by rattling panels or loads can also be significant from heavy good vehicles.

The A27 has a 40mph speed limit near to residential property. Traffic, west bound, queues at the Lancing Manor roundabout during peak times so speed is not really a factor; whereas traffic, east bound, at this point accelerates from the roundabout. It is engine noise as opposed to tyre noise that is important in these locations and the low noise surface will have little benefit during these peak traffic times. So in effect these homes have been offered little protection from traffic noise and I would recommend that this is addressed as part of the highway improvements that form part of this development.

I am of the view that the access roads to the houses south of the carriageway could be improved with acoustic fencing and planting placed along the islands that separate the access road from the main carriageway. This would mitigate the effects of traffic noise in this area. I appreciate that not all homes will be protected with such a scheme but a significant number will be and those homes further from the road would also hear the benefits. Therefore I do believe such a scheme is worthwhile.

The School

Noise sensitive development, such as a school, is outside the scope of the ProPG Guidance and the applicant has correctly used the BB93 Guidance and Acoustics for Schools a design guide 2015, in this case.

The applicant's acoustic assessment observed the sources of noise in this location as being road noise from the West and the A27, and from helicopters and light aircraft.

The mitigation measures, included 3m high barriers to mitigate road noise, but did not elaborate on the aircraft noise contribution to the ambient noise levels in the area. Looking at the expected noise attenuation provided by the barriers I suspect that the aircraft contribution is significant. A 3m high barrier will not prevent noise from overhead aircraft. I have tried looking at the noise contour information from Shoreham Airport, the school falls outside the 50dB contour; however, this is reported as 16hr L_{Aeq} so comparison with the 30 minute L_{Aeq} standard that should be achieved for the school is meaningless. In essence the standards set out in the above guidance cannot be achieved if the school remains in its current position and I would suggest that a new location for the school is found to the West of the development site in order that the noise standards can be achieved. It was observed in the L2 monitoring position that aircraft noise was only occasional and this seems to me a more suitable location for the school.

I appreciate that this may require the development being re-orientated, however, the ProPG assessment may also come back with the need for the site to be re-orientated to provide the optimum acoustic outcome for the development as a whole.

Construction Noise

I would recommend that a condition requiring a construction noise management plan is included in any permission. This management plan should include the construction mitigation proposals set out in Section 8.6 of the Environmental Statement.

Where further vibration assessment is undertaken; I would recommend that that the condition specifically covers this. For instance, we would want to see the trial vibration test

results and how they compare with the relevant standards and if necessary agree details of any proposed mitigation before further piling commenced.

Operation Noise

The Environmental Statement identifies that New Monks House, part of the new development, will be affected by traffic noise and puts forward two proposals to mitigate the noise impact. I would recommend a condition choosing the planners preferred scheme, including construction and details of the materials to be used in the barrier. e.g. will it be a fence or a wall. I would suggest that if the chosen scheme is the 2.5m barrier with reduced speed to 20mph, then the condition shall include that a speed camera or other traffic calming measures are put in place here to ensure traffic is slowed down to the required speed.

I would also advise that the retail development has a condition placed on it that the occupier shall have a noise management plan to deal with noise from the operation of the premises.

Mechanical services noise from the school and retail store are yet to be assessed and I would recommend a condition to ensure noise levels and proposed mitigation is acceptable and agreed before installation.

Pumping Station

There are no adverse EH comments regarding this facility.

Football Pitches

There are no adverse EH comments regarding the proposed mitigation for the new housing surrounding the pitches.

Environmental Health – Noise (second response)

“We discussed the design approach and the constraints on the development site such as drainage, the planning preference to keep the space to the East of the development undeveloped and open, and the planning requirements on the number of homes that had to be provided in that space. We discussed the school position and the choice that was made to put the school there rather than housing closer to the main road. Finally we looked at the helicopter routes and the need for a noise barrier along the A27.

Following on from that discussion I accept that the proposed layout is probably as good as it can be from an acoustic point of view, in that there would be better outcomes from acoustically protecting the school than acoustically protecting homes. Also, my concerns about achieving the external noise levels for outside teaching can be achieved through further tweaking of the school design which will need to be discussed and agreed with West Sussex County Council before the final plans are submitted for agreement at a later stage. Therefore I would request that a condition be applied to any permission requiring that the final design and orientation of the school building shall be optimised to provide quiet external teaching areas for the children.

Following on from the meeting I understand that Shoreham Airport will reroute the helicopter circuits so to minimise the impact on the development. These new routes will be published.

Finally, we discussed the need for a barrier to protect existing homes along the A27 towards Lancing Manor roundabout. My concerns were twofold. First that we should not be allowing noise levels in an important noise area to increase without mitigation and secondly was that if traffic is congested and slow moving for longer periods then the benefit of a quiet road surface that was proposed by Highways England will not be fulfilled. The applicant's acoustic consultant correctly argued that when traffic slows the noise from that traffic also reduces. However, the debate on the best way forward and whether to provide a noise barrier became academic when during that discussion I learned that Highways England are proposing further plans to improve the Westbound junction of the A27 with Grinstead Lane, which will be subject to a further planning application.

As I understand, as part of this application and other proposed development in Sompting, the developers are making financial contributions to Highways England for road improvements along the A27. I would request that some of that contribution be used for acoustic improvements to protect existing property along the A27 when those applications are submitted. The extent and feasibility of any acoustic improvements will have to be explored in more detail once the proposed junction plans are finalised and therefore I am satisfied that this matter can be addressed through the planning process at a later date."

Head of Place and Economy

"In response to your letter dated 1st June 2018 regarding the proposals for the development of New Monks Farm, it's important to set this in context of the local economy and strategic connections to create growth.

The wider economic benefits need to be highlighted, especially in the context of a constrained environment in which we sit. This development provides new employment space but more so has the potential to add £11.4m GVA to the local economy. Within this there are real opportunities for our communities to step into, and access, new jobs (circa 400) whilst the additional residential units will assist with the growing demand for housing.

The Strategic Economic Plan (by Coast to Capital) highlights "new business space and investment will have consolidated key companies" and "have the potential to provide high quality, well-paid jobs in the decades to come". This scheme can contribute not only to the immediate area but the region."

Head of Major Projects and Investment

"I am writing on behalf of Worthing Borough Council as the one third beneficial shareholder of Shoreham Airport. As the freeholder, we offer no objection to the proposed development.

Worthing Borough Council along with the other joint freeholder Brighton & Hove City Council have undertaken lengthy and detailed discussions with the administrators of the airport on the proposals at Shoreham Airport with a view to ensuring that developments at Shoreham Airport contribute to the long term economic development of the area.

As a result, on 1st February 2018, Worthing Borough Council agreed revised lease heads of terms with the airport's administrators to facilitate economic and commercial development at the airport. The Joint Strategic Committee agreed:

- in principle to the grant of four new 350 year head leases as detailed on the Plan*
- the payment of the outstanding deferred consideration owed;*
- the payment of a lease premium to be apportioned across the four new leases (value to be determined by an external valuer)*
- change of uses and other terms altered as per the heads of terms;*
- delegated agreement of the detailed lease terms and all other steps necessary to enable the proposals outlined in this report to proceed to the Director for the Economy in consultation with the Leader of Worthing Borough Council.*

In recent years, the Airport has failed to deliver significant job creation due to poor management by the tenant, now in administration, despite numerous schemes being proposed and there has been no delivery to meet wider employment generation aims. The new agreement with the administration company presents an opportunity to continue to facilitate the delivery of the wider economic benefits for the wider area (including Worthing Borough) as well as leading to investment in Adur District and promoting inward investment in the region.

As a result of these negotiations, a planning application has been submitted by Albermarle Shoreham Airport in Administration (ASAL) for a substantial development at the airport for the construction of up to 25,000 m² of B1(c), B2 and B8 floorspace along with access, landscaping and associated infrastructure (including a new pumping facility on the River Adur (application number AWD/1093/17).

ASAL and New Monks Farm Development Ltd have worked in partnership to develop and agree joint transport and flood/drainage strategies that will ensure that both developments have sufficient infrastructure to serve the developments. The applicants for the airport planning application have highlighted that the delivery of their proposal is co-dependent on the delivery of the infrastructure that is also required for the New Monks Farm development including:

- The delivery of the City Deal funded Adur tidal walls flood defence scheme.*
- Replacement of the Sussex Pad junction on the A27 with a new roundabout.*

While a decision on the Airport application has yet to be reached, the applicants have highlighted the economic benefits of the proposal including the creation of up to 200 jobs, as well as wider positive economic multipliers when future employees deliver further

consumption in local businesses. While the application's Environmental Statement also identifies a number of adverse effects arising for the scheme, these economic benefits are considered substantial, and it will be the role of the planning case officer and planning committee to weigh and apportion the overall planning balance of the application.

In conclusion, Worthing Borough Council as freeholder have worked in conjunction with Brighton & Hove City Council to develop proposals that will support the positive economic contribution that Shoreham Airport makes to the wider region. The proposed application for 25,000 square feet of B-class commercial space will contribute to this objective. ASAL have made clear that the two applications are concatenated to enable the delivery of complementary infrastructure that is required for both applications. As the proposed development is therefore considered to contribute to Worthing Borough Council's objective of ensuring that the airport makes a positive economic contribution to the area, we offer no objection to the proposed development by New Monks Farm Ltd."

The **Head of Housing** raises **no objection** to the development and comments that,

"There is an enduring and significant need for affordable housing in the Adur District. The Council's Housing Register for the area is approaching 1,000 households who have been assessed as not able to compete in the market for either for home ownership or privately rented homes.

This register is primarily for residents who need rented homes as those who can potentially purchase shared ownership or other intermediate forms of housing are encouraged to register with the regional zone agent a registered provider called BPHA.

The need for rented homes extends from one bedroom accommodation through to much larger family homes with at least four bedrooms. The mix proposed will assist a range of household and family sizes but we would request consideration in future phases for some larger family homes.

I am pleased to see that the proposed new development will deliver 180 new affordable homes which is a policy compliant 30% of the overall scheme and of these 108 (60%) will be for rent. This will have a very important impact on the housing need in the District and will improve the lives of local residents in a significant and lasting way. This development will achieve a proportion of affordable rented homes not seen for some considerable time in other developments.

Provided that the Council is satisfied that the developer cannot meet a fully compliant scheme ie 75% homes for rent due to the negative impact on the viability and deliverable of the scheme overall, I fully support the scheme.

At the current time the local housing allowance (LHA) for the area is such that the level of rents proposed which will be at or below this level will be less than the definition of affordable rent which is 80% of the market rent level.

I would urge the applicant to select a registered provider as soon as possible so the the councils housing team, the developer and the selected registered provider can start the joint work to bring the scheme forward.

I note the commitment to market the intermediate homes to local residents which is an equally important feature of the development as it should meet the needs of local people struggling or unable to access the local private housing market. Again I would offer the housing team's support in this regard."

Environment Agency

We have **no objections** to the proposed development, **subject to the following conditions**.

Without the inclusion of these conditions the development poses an unacceptable risk to the environment, and to people and property from flood risk, and would be contrary to the development plan and national planning policy.

Condition 1 – Flood risk mitigation

The development permitted by this planning permission shall be carried out in accordance with the approved Flood Risk Assessment (FRA) (CEP v1.4, dated June 2017) and FRA Addendum (CEP v1.3, dated December 2017) and the following mitigation measures detailed within:

- Crest height of the onsite flood defence embankment to be set no lower than 5.4mAOD
- Finished first floor levels to habitable accommodation to be set no lower than 5.7mAOD
- Finished floor levels to retail store and primary school to be set no lower than 4.5mAOD
- Floor levels to the proposed traveller site are set no lower than (4.35mAOD) and highest (5.0mAOD) as shown on drawing number (2-401A)

Reason: The site is located within tidal Flood Zone 3 of our Flood Map. This indicates land with a high probability (1 in 200 year) of flooding from the sea, in accordance with the national Planning Practice Guidance (PPG) (ref. 7-065-20140306).

Policy 36 'Flood risk and sustainable drainage' of the Adur Local Plan 2017 states developments in areas of such flood risk must be demonstrated to be safe for their lifetime and appropriately flood resilient and resistant.

The submitted Flood Risk Assessment (FRA) demonstrates that the tidal flood risks to the proposed development will be adequately mitigated by the construction of a flood defence embankment along the eastern boundary of the proposed country park, which will add an additional level of protection to the Shoreham Adur Tidal Walls (SATW) defences.

The proposed relocation of the Withy Patch gypsy and traveller site represents a significant betterment in terms of flood risk. Finished floor levels as part of the re-contouring will be some 2 metres higher than the present location.

Information submitted demonstrates that the existing site levels at the proposed Withy Patch relocation site are above the present day 1 in 200 year flood level (Flood Zone 3). Following the development some of the units will have a finished floor level below the 1 in 200 tidal flood risk level, taking into account the impacts of climate change over the lifetime of the development. However, it is acknowledged that the proposed embankment, in addition to the Shoreham Adur Tidal Walls scheme understood to be starting March 2018, will result in a low tidal flood risk to the site.

Whilst, ground floor accommodation to the residential units will be below the undefended 1 in 200 year flood level, safe refuge will be available at first floor in this event. All residential units will be protected from the SATW scheme and the flood embankment.

The above condition is required in order to protect people and property from flooding, in accordance with the Adur Local Plan 2017 and Section 9 of the Planning Practice Guidance to the National Planning Policy Framework (NPPF) for Flood Risk and Coastal Change.

Condition 2 – Compensatory habitat

No development of the pumping station or associated works below mean high water mark approved by this permission shall take place until a scheme for the provision and management of at least 840m² compensatory intertidal habitat creation, in accordance with Flood Risk Assessment (FRA) Addendum ((CEP v1.3, dated December 2017) and drawing ref. 6-301, has been submitted to and agreed in writing by the local planning authority.

The scheme shall include:

- Scaled plans showing the exact areas of intertidal habitat lost and gained
- Methods for implementing and maintaining the compensatory habitat, including how any environmental risks will be mitigated
- Timings

Thereafter the development shall be implemented in accordance with the approved scheme.

Reason: The FRA Addendum states that the proposed pumping station will result in the loss of 770m² of area designated for compensatory intertidal habitat for the Shoreham Adur Tidal Walls defence scheme.

The Adur Estuary, together with Rye Harbour, represent the only significant areas of intertidal habitat between Pagham Harbour to the west and Sandwich Bay to the east, making the estuary a very important site in terms of its local ecological value.

The estuary is designated as a Site of Special Scientific Interest, at the reach adjacent the proposed pumping station.

The intertidal foreshore provides a sensitive, unique and ecologically rich habitat that supports an abundance of invertebrates and associated wading and wintering wildfowl. Mudflats are a priority habitat in the Government's UK Biodiversity Action Plan (UK BAP),

and highlighted as under threat in the Sussex local BAP. One of the main objectives is to maintain at least its present extent and regional distribution.

Development that encroaches on the estuaries has a potentially severe impact on their ecological value.

Policy 31 'Biodiversity' of Adur Local Plan 2017 states that development should protect and where possible enhance biodiversity, including BAP and marine habitats. The policy is clear that where impacts cannot be compensated, then development should be refused.

The net loss of intertidal habitat would result in significant adverse impacts on one of the area's most important natural assets. The implementation of compensation identified in the application is therefore essential to the proposals being acceptable.

Condition 4 – Construction Environmental Management Plan

No development shall take place until a construction environmental management plan that is in accordance with the approach outlined in the Environmental Statement, has been submitted to and approved in writing by the local planning authority.

This shall deal with the treatment of any environmentally sensitive areas, their aftercare and maintenance as well as a plan detailing the works to be carried out showing how the environment will be protected during the works. Such a scheme shall include details of the following:

- The timing of the works
- The measures to be used during the development in order to minimise environmental impact of the works (considering both potential disturbance and pollution)
- A map or plan showing areas designated for oil storage, washing down concrete/ cement, etc
- A map or plan showing habitat areas to be specifically protected during the works
- Any necessary pollution protection methods
- Information on the persons/bodies responsible for particular activities associated with the method statement that demonstrate they are qualified for the activity they are undertaking.

The works shall be carried out in accordance with the approved method statement.

Reason: The proposed development involves substantial works to the Lancing Ditches in order to provide surface water drainage for the development, as well as ecological enhancements.

Policy 5 'New Monks Farm' of the Adur Local Plan 2017 makes clear that the retention and enhancement of the existing network of ditches is an essential component of any landscape and ecological strategy for the site.

Policy 31 'Biodiversity' of the Adur Local Plan 2017 states that development should protect and where possible enhance biodiversity, including BAP habitats.

The above condition is required to ensure that the works to, within and adjacent all waterbodies, including the River Adur, are appropriately designed, timed, and implemented to mitigate risks to wildlife and the environment.

The Environmental Statement provides principles for mitigating construction impacts to the environment, but does not have detail on how impacts from the construction of the pumping station will be managed.

Condition 5 – Buffer zone

No development shall take place until a scheme for the provision and management of a buffer zone of at least 5m alongside all ditches on site shall be submitted to and agreed in writing by the local planning authority. Thereafter the development shall be carried out in accordance with the approved scheme and any subsequent amendments shall be agreed in writing with the local planning authority.

The buffer zone scheme shall be free from built development including lighting, domestic gardens and formal landscaping; and could form a vital part of green infrastructure provision. The schemes shall include:

- plans showing the extent and layout of the buffer zone.
- details of any proposed planting scheme (for example, native species).
- details demonstrating how the buffer zone will be protected during development and managed/ maintained over the longer term including adequate financial provision and named body responsible for management plus production of detailed management plan.
- details of any proposed footpaths, fencing, lighting etc.

Reason: Development that encroaches on watercourses has a potentially severe impact on their ecological value.

Policy 5 ‘New Monks Farm’ of the Adur Local Plan 2017 makes clear that the retention and enhancement of the existing network of ditches is an essential component of any landscape and ecological strategy for the site.

Policy 31 ‘Biodiversity’ of the Adur Local Plan 2017 states that development should protect and where possible enhance biodiversity, including BAP habitats.

Improvements to the ditch network are proposed in line with the Local Plan. The above condition is required in order to ensure that the corridors to the watercourses are protected from inappropriate development.

Although a minimum 5m buffer has been referred to, where room allows (e.g. in the country park) the buffer zone should be maximized for ecological protection.

Condition 6 – Detailed Watercourse Management Plan

No development shall take place until a detailed watercourse management plan, in accordance with the approved Draft Watercourse and Flood Defence Bund Management Plan, including long- term ecological objectives, management responsibilities and

maintenance schedules for all of the ditches on the site, shall be submitted to and approved in writing by the local planning authority.

The water management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning authority.

The scheme shall include the following elements:

- details on how water levels in the ditches shall be maintained to achieve the long term ecological objectives of the plan
- details of maintenance regimes and management responsibilities
- details of eel passage through hydrological barriers as required by Eel Regulations
- details of monitoring and adaptive management

Reason: The proposed development involves substantial works to the Lancing Ditches in order to provide surface water drainage for the development, as well as ecological enhancements.

Policy 5 'New Monks Farm' of the Adur Local Plan 2017 makes clear that the retention and enhancement of the existing network of ditches is an essential component of any landscape and ecological strategy for the site.

Policy 31 'Biodiversity' of the Adur Local Plan 2017 states that development should protect and where possible enhance biodiversity, including BAP and marine habitats.

The proposed modifications to the ditch network to provide surface water drainage for the development could result in the detrimental impacts to the ecological quality of the watercourses, e.g. from inadequate water levels.

The above condition is required to ensure that the management of the watercourse is undertaken for their ecological enhancement and long term management.

Condition 7 – Detailed design of channels

No works to the ditch network approved by this permission shall take place until a detailed scheme of the proposed alterations to the ditches shall be submitted to and approved in writing by the local planning authority. The scheme shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning authority.

The scheme shall include the following:

- scaled plan and section drawings of channel profiles
- details of how profiles and features have been incorporated to maximise ecological benefit
- details of the design of the reedbed pond
- details of the design of the sedge bed wetland

Plans showing sections and plans for the northern watercourse have been submitted. However, no such detail has been submitted for the other new watercourses on the site, or the watercourses that are proposed to be altered.

Reason: The proposed development involves substantial works to the Lancing Ditches in order to provide surface water drainage for the development, as well as ecological enhancements.

Policy 5 'New Monks Farm' of the Adur Local Plan 2017 makes clear that the retention and enhancement of the existing network of ditches is an essential component of any landscape and ecological strategy for the site.

Policy 31 'Biodiversity' of the Adur Local Plan 2017 states that development should protect and where possible enhance biodiversity, including BAP habitats.

The above condition is required in order to ensure that the detailed design of the watercourses is undertaken to maximize their ecological value.

Whilst detailed sections and plans have been provided for the new northern channel; similar details must be approved for the other new and altered watercourses on the site.

Condition 9 – Unsuspected contamination

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

Reason: There are not considered to be high risks to groundwater receptors from the development of the site.

However, the submitted site investigation report found that some isolated areas of contaminated soil have been identified on the site.

Policy 34 'Pollution and Contamination' of the Adur Local Plan 2017 states that development should not result in pollution of the water environment.

The above condition is required in order to that any contamination discovered during the implementation of the development is adequately characterized, and if required remediated and verified, in order to protect groundwater.

Further advice

Nature conservation legislation – Advice to LPA

The LPA is reminded of their responsibilities under environmental legislation.

Under section 40 of NERC Act 2006 local planning authorities must have regard to purpose of conserving biodiversity, including restoring and enhancing species, populations and habitats, as well as protecting them.

Under the Wildlife and Countryside Act 1981, LPAs should take reasonable steps to further the conservation and enhancement of the flora, fauna or geological or physiographical features by reason of which the site is of special scientific interest.

Working near watercourses – Advice to developer

We would expect that all works in and near waterbodies are undertaken following current best practice and with minimum impact on water quality.

In the event of a pollution incident, all works should cease immediately and the Environment Agency should be contacted via the incident hotline 0800 807060.

Flood resilience and resistance – Advice to developer/ LPA

We strongly recommend that consideration be given to use of flood proofing measures to reduce the impact of flooding when it occurs. Flood proofing measures include barriers on ground floor doors, windows and access points and bringing in electrical services into the building at a high level so that plugs are located above possible flood levels.

We recommend reading the following guidance: 'Improving the flood resilience of new buildings' 'Prepare your property for flooding: A guide for householders and small businesses'. Consultation with the relevant building control department is recommended when determining if flood proofing measures are effective.

Flood warning and evacuation plans – Advice to developer/ LPA

As the proposed buildings have finished flood levels below the undefended 1 in 200 year level, including an allowance for climate change, there is a residual risk that they could experience internal inundation in the design flood event in their lifetime, if both flood defences between the Adur and the site were to fail.

In this situation, occupiers would be reliant on flood warning and evacuation procedures to ensure their safety.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise LPAs to formally consider the emergency planning and rescue implications of new development in making their decisions.

The PPG states that LPAs should consult their emergency planning staff to ensure evacuation plans are suitable through appropriate planning conditions (Ref. 7-054-20150415).

We therefore recommend seeking comments from the relevant emergency planners.

Please note that it is not our role to assess the detail of flood evacuation or emergency plans. We do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/ users covered by our flood warning network.

Other consents/ approvals

The following consents/ permissions/ approvals may be required for the proposed development, prior to implementation.

Environmental Permit for Flood Risk Activity

Any works in, under or over the tidal River Adur or within 16m from the landward toe, will require an Environment Permit for Flood Risk Activity (FRAP) from us. As part of the permit, future management and maintenance regimes will need to be demonstrated.

Planning permission is no guarantee that a FRAP will be granted.

On the basis that the Shoreham Adur Tidal Walls scheme for section W7 is anticipated to commence March 2018, it is unlikely to be possible to carry out the riverbank realignment so as to accommodate the surface water pumping station. **It must be ensured that the developers agree the location and timing of the works with the SATW team, as for any alternative location which may compromise the built W7 section of the SATW scheme, a Flood Risk Activity Permit (FRAP) would not be forthcoming.**

Pumping station design

Details of the pump/ plant life expectancy with short, medium and long term investment programmes for their replacement should be provided. Details of emergency measures should breakdown occur such as a power mains failure, should also be provided. For the Agency's own assets, we manage them based on the apparatus being flood resilient to a 1 in 1000 year flood event/ level and pump electrics raised in water tight containers.

On site static generators, and the ability to overpump and pump settings for high levels and low level alarms will be needed. We would also recommend that whilst the screw adequately deals with weed, it will need to be guarded against tyres, timber, animals etc.

The applicant is advised to base the pumping station design and protocol based on the EA's own risk analysis (due to be updated shortly). Generally speaking, the recommendations are for pumping stations to be designed to accommodate a 1 in 1000 year flood event.

Whilst it is a matter for West Sussex County Council, as the Lead Local Flood Authority (LLFA) to comment on surface water disposal rates and the sizing of the pumping station, it is noted that no data has been provided which shows the pumping station catchment area served, or the area within the catchment to be pumped. This is normally required so as pumps can be suitably sized and determined

Fish Passage

The pumping station will need to be designed and operated in such a way as to not infringe upon movement of fish upstream or downstream of the pumping station, in particular to allow free passage of eels and comply with the Eel Regulations.

Please contact our local consents team at PSOWestSussex@environment-agency.gov.uk for more information on the requirements of a FRAP.

Ordinary Watercourses Any works in, under or over or within 5m from the watercourse bank edges will require the formal prior consent of the LLFA, and an application for land drainage consent applied for. This will likely include identified works for proposed culverts,

bridges, outfalls, penstocks, the embankment/bund, infilling and realignment of existing watercourses, and proposed new channels

Abstraction Licence The applicant is advised that on the basis that normal watercourse flow is to be effectively reversed, an Abstraction Licence may be needed.

Please contact our enquiries team at enquiries@environment-agency.gov.uk for more information on the requirements of an abstraction licence.

Marine Licence

The applicant is advised that a Marine Licence from the Marine Management Organisation (MMO) will most likely be needed.

The MMO can be contacted at marine.consent@marinemangement.org.uk or telephone on 0300 123 1032.

Final comments

In line with the 6 tests in the PPG, we only recommend conditions where we consider these to be necessary to make the development acceptable. Therefore, if the above recommended conditions cannot be included in any permission, then we would consider the development unacceptable and our position would be to object. If you are minded to grant permission without the inclusions of these conditions, please contact me directly before making the formal decision. We would want to have the opportunity to understand the material considerations that outweigh our recommendations, and possibly make further representations.

Campaign to Protect Rural England

"This letter is a holding response from CPRE Sussex in response to the above application, pending receipt of further information on a number of important matters which bear significantly on the planning merits of this case (for example, the Adur Local Plan Inspector's Report and additional information on the impact of the proposed development on the A27 trunk road and on managing flood risk and surface water drainage). Accordingly, we reserve the right to make further comments when this information becomes available.

CPRE Sussex works to promote the beauty, tranquility and diversity of the Sussex countryside by encouraging the sustainable use of land and other natural resources in town and country. We encourage appropriate and sustainable land use, farming, woodland and biodiversity policies and practice to improve the well-being of rural communities.

We have considered the planning policy background, the planning application and the supporting information provided with it and we have the following comments to make:

(a) Planning Policy

1. The application site is in open countryside which is not allocated for development in the adopted Adur Local Plan (1996). It comprises the western part of a "strategic gap" of open

land between Lancing and Shoreham. Although the adopted plan was intended to run only to 2006, some of its policies have been "saved" and remain in force as part of the development plan for the area. These include the following policies:

- **AC1- Protection of the countryside:** this protects the countryside for its own sake and strictly controls outside which does not need to be located there.
- **AC4- Protection of strategic gaps:** this protects countryside which forms an important gap between built up areas in order to prevent their coalescence and to retain their separate character and identity.
- **AP4 and AP5- Development and land drainage:** these policies seek arrangements to provide appropriate land drainage arrangements in order to avoid, manage or mitigate flood risk problems both on and off development sites.
- **AH3- Housing to meet local need:** negotiation of an element of social housing to meet local need.
- **AP11- Listed buildings:** protection of the setting of listed buildings.

2. As the application proposals clearly conflict with policies AC1 and AC4, they would be a departure from the development plan, requiring reference to the Secretary of State to see if the proposals should be "called in" for his own determination following a public inquiry. In doing so, the Secretary of State will need to consider the impact of the proposals over a large area extending beyond Adur District in terms of loss of a significant part of one of the few gaps of open countryside on this part of the Sussex Coast; the impact of a large "out of town" retail development on nearby town centres; impact on the adjacent National Park landscape; and impact on the A27 trunk route.

3. The 1996 Local Plan is being replaced by a new local plan. Adur District Council submitted a new local plan to the Secretary of State for examination in 2016. The examination was held in January- February 2017. The Inspector's report is not yet available, although he indicated his preliminary findings, and suggested some matters requiring further attention if the plan is to be considered "sound" in May 2017. The new Local Plan has had to consider provision of additional land to meet the need for more housing and employment over the period to 2031. CPRE accepts that this is a very difficult task in a district which is small geographically and where there is little available land between the South Downs National Park and the sea, and where extensive areas are also subject to various forms of flood risk.

4. As part of its strategic development provision, the new local plan is proposing a major allocation of land at New Monks Farm, which largely coincides with the application site. The proposed allocation in Policy 5 of the new local plan comprises:

- Around 10,000 square metres of commercial floor space
- 600 new homes, of which 30% would be affordable
- A primary school
- A relocated and enlarged site for Gypsies and Travellers
- A community hub
- A country park

5. This proposal has been very controversial and has prompted considerable local debate, particularly in terms of its impact on the strategic gap between Lancing and Shoreham;

flood risk; the A27 trunk road; and the local landscape and heritage. CPRE Sussex has raised significant concerns on all these matters throughout the local plan process. Although preparation of the new local plan is well advanced, its "soundness" and overall planning strategy, including the major allocation at New Monks Farm, have not yet been endorsed by an independent inspector. Therefore, CPRE Sussex considers that any decision to grant planning permission in advance of the Inspector's report would be premature and prejudicial to the local plan process.

6. Publication of the Inspector's report is expected in the near future. Accordingly, CPRE Sussex would like to reserve the right to come back with further comments on the application proposals once this report is published. Even when the inspector's report is available, there are material differences between the proposed local plan allocation and the current planning application, (for example, in the extent of the strategic gap taken by development and in the size of commercial floor space — both of which are larger in the application, the latter considerably so.) This means that careful detailed consideration of the planning merits of application proposals will be necessary, even if Policy 5 receives the Inspector's broad endorsement.

(b) Strategic gap between Lancing and Shoreham

7. The safeguarding of this strategic gap has been a longstanding feature of local planning policy in the area. Policy AC4 from the 1996 plan has been carried through into the new local plan, where Policy 14 seeks to maintain the gap between Lancing and Shoreham in order to prevent their coalescence and preserve their separate character and identity. Notwithstanding the new local plan work and the applicants' declaration of a "landscape-led approach", there is no getting away from the fact that you cannot protect a strategic gap by building over a large part of it and thus narrowing the open countryside which separates the two settlements.

8. To a limited extent, the strategic gap has been compromised by the Brighton & Hove Albion FC training complex immediately to the south of the application site. However, the training complex has a relatively small building footprint in comparison with the extensive open areas given over to playing pitches, albeit with some floodlighting and high netting fences (both urbanising features). As such, it does not set a precedent for the much more extensive and intensive form of development proposed in the current application, which has a far greater visual impact on the strategic gap.

9. This impact is offset by the country park proposals on the eastern side of the application site, but nevertheless the strategic gap between Lancing and Shoreham is reduced by about one-third, leaving only the airport — with a narrow ribbon of development along the A259 frontage- as an intervening open area.

(c) Flood risk

10. The application site is on the tidal flood plan of the Adur and falls predominantly within Flood Zone 3a in the national classification of flood risk (high probability). The site is at risk not only from tidal flooding, but also from surface water flooding and groundwater flooding. The whole site and surrounding areas have a greater than 75% risk of flooding from groundwater. This is not a theoretical risk: parts of the site have flooded at various

times in recent years, most recently in the winters of 1994 and 2003 with flooding in the surrounding area in the winters of 2012/13 and 2013/14 2014/15 and 2015/16.

11. CPRE Sussex have submitted extensive comments on the flood risk issue as part of its submissions on the 2016 pre-submission Local Plan, where we set out in detail our concerns over flood risk on the proposed allocation site. Notwithstanding the efforts of the applicants to address flood risk issues in the current application proposals, we remain concerned that surface water drainage and groundwater issues have not been adequately addressed and that, accordingly, the scheme does not accord with national guidance on development and flood risk.

12. The Environment Agency's Shoreham Adur Tidal River Walls project will raise and strengthen flood defences along the west bank of the river and so mitigate some of the tidal flood risk arising from rising sea levels and increased risk of storm surges. The application proposals will benefit from this investment in improved flood defence. However, CPRE Sussex remains concerned about surface water drainage and groundwater flooding for the following reasons:

- The flatness of the site means that there is only a minimal hydraulic gradient to drain off surface water and groundwater into the two outfalls into the Adur.
- Effective drainage of the site requires a very high standard of maintenance on surface water drains and ditches across the application site, and beyond, eastwards to the Adur. There do not appear to be any long-term arrangements, with dedicated funding (including an instant access performance bond) to ensure that this takes place.
- The two outfalls on the Adur are tide-locked for about half of any given 24 hour period. The application fails to consider the effects of sea level rise on the effectiveness of the sluices over the lifetime of the development. This is a significant omission as over time the sluices will be tide-locked for longer and longer periods increasing the need for attenuation within the whole Lancing Brooks ditch network. Unless this is addressed, the outcome would be increased risk of flooding in the surrounding area.
- The applicants place undue reliance on "filtration" methods of surface water drainage, which are unlikely to be effective in an area with high ground water levels and the illustrative masterplan appears to offer little in the way of "attenuation" methods (to store and slow water run-off in extreme rainfall events) such as swales and holding ponds.
- The application proposals include some land raising and the impact of this on surface water drainage and flood risk elsewhere needs to be explicitly assessed.
- Monitoring data which has informed the FRA is too limited and takes no account of the effects on groundwater from 1/100 year events. Monitoring should have been carried out for a longer period to fully understand the implications of groundwater on the drainage systems, particularly in extreme weather conditions.

13. These concerns are reinforced by the conclusions of C2HM Hill's Lancing Surface Water Management Plan for West Sussex County Council in September 2015, which concludes that:

Even with all of these (mitigation) measures in place, Lancing will still be at risk of flooding during more extreme weather events. This is because drainage systems (both natural and man-made) and any other flood risk infrastructure will become overwhelmed during

extreme weather events. in addition, Lancing is highly vulnerable to groundwater flooding (or drainage is affected by groundwater levels), which is significantly more technically and economically challenging to manage.

14. In light of these concerns, and any further comments on flood risk issues in relation to the proposed allocation site by the Local Plan Inspector, Adur District Council should rigorously apply the "sequential" and "exception" tests to the application proposals to ensure that the development of this low-lying site can be justified and is safe for users and occupants of the buildings for its lifetime without increasing flood risk elsewhere, as per the National Planning Policy Framework (NPPF.)

(d) Transport

15. The site adjoins the A27 trunk road which already carries around 60,000 vehicles per day in this area, about two-thirds of which is local traffic and one-third through traffic along the south coast. The standard of the A27 is very variable. To the east of the application site, the Brighton & Hove By-Pass is a high capacity dual carriageway road with grade separated junctions. However, to the west through Lancing and Worthing, the standard of the road varies between single and dual carriageway. In addition, there are many busy junctions at grade with roundabouts and traffic lights, together with residential and business properties with access directly onto the A27, all of which slow traffic. As a result, the road is very often congested and has a poor accident record. Highways England has recently published for consultation a package of improvements to the A27 between Worthing and Lancing. The proposals focus on improving the capacity, safety and free flow of traffic around key junctions.

16. The addition of a set of large scale traffic generators on the application site – particularly the proposed retail store - will add considerably to traffic on the A27. The applicants have proposed a new signal-controlled roundabout to act as the main access to the site. CPRE Sussex is concerned about the capacity of the local highway network to handle this extra traffic, particularly given the propensity of the proposed retail use to generate longer distance trips. We note that both Highways England (responsible for the A27) and West Sussex Highways (the local highway authority) have a number of concerns in relation to the Transportation Assessment accompanying the application and are seeking further information to clarify the impact of the proposed development. At this stage, it remains unclear whether the application proposals are satisfactory in traffic terms and how - and when- any necessary off-site highway improvements would be financed and delivered. We understand that the applicants are seeking external grant assistance for some elements of off-site infrastructure. In addition, it is not clear how the application proposals relate to Highways England's current proposals for A27 improvements.

(e) Heritage

17. The application site immediately adjoins the South Downs National Park, which lies to the north of the A27. It is understood that the applicants are clarifying with the National Park Authority whether any part the application site extends over into the designated area. The two statutory purposes of the national park are:

- To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.*

- To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

18. Although all (or perhaps almost all) the application site lies outside the South Downs National Park, the impact of the proposed development on the purposes and setting of the national park are material planning considerations. This means that the impact of the proposed development on **views out from the higher ground to the north within the national park and views into the national park from the application site and other undesignated areas to the south**, both have to be taken into account. CPRE Sussex is concerned that this material consideration has not been given due weight in the application proposals.

19. Two examples illustrate this failure to properly consider impact on the setting of the national park. First, the applicants own analysis indicates a "moderate to major" visual impact from the commercial housing elements of the application proposals, but fails to indicate how these impacts will be managed and mitigated to make them a harmonious neighbour to the national park. The bulk, colouring and branding of the retail building are plainly driven by commercial requirements rather than fitting it into its surroundings, as a "landscape-led" approach would require. Secondly, from many public vantage points, the scheme sits in the foreground of one of the best-loved views of the South Downs, namely the iconic collection of Lancing College buildings (many of which are listed) on a downland ridge above the Adur Valley.

20. The second national park purpose of promoting public understanding and enjoyment will be affected by the application proposals for changes to pedestrian and cyclist access to the national park from residential areas south of the A27. This has been the subject of many objections to the application proposals by local residents, equestrians and cyclists. CPRE Sussex shares these concerns.

(f) Cumulative impact

CPRE Sussex is aware that another major application has recently been submitted by Albermarle (Shoreham Airport) Ltd. on a nearby site at Cecil Pashley Way **Shoreham Airport (AWDM/1093/17)**

The application is for "Outline planning permission for the erection of new commercial buildings with an overall height of 14ms to provide up to 25000m² of floorspace for Light Industrial (Use Class B1c), General Industrial (Use Class B2) and Storage and Distribution (Use Class B8) with access, landscaping and associated infrastructure (including a new pumping facility on the River Adur)"

Whilst Adur DC is legally obliged to consider New Monks Farm and this other application on their own individual planning merits, there are clearly overlapping issues which will require their cumulative impact to be considered. These issues are:

- Compatibility with Policy 5 and Policy 7 of the emerging Adur Local Plan (if that is endorsed by the Inspector).
- Impact on the integrity of the strategic gap of open countryside between Lancing and Shoreham.

- *Impact on flood risk and land drainage over the two application sites and adjacent areas on the tidal flood plain.*
- *Traffic impact on the A27 and the local highway network.*
- *Impact on local natural and historic heritage, particularly the National Park and the setting of important listed buildings.*

CPRE Sussex urges Adur DC to give careful consideration to these cumulative impact issues which, if both applications proceed, can only intensify our concerns about the harmful impact of these major developments on the local area.

Conclusion

CPRE Sussex wishes to lodge a holding objection to the application proposals for the reasons set out in paragraphs 1-20 above. We urge Adur District Council not to determine this application until the Local Plan Inspector has published his conclusions on New Monks Farm, and further information is provided on the technical issues highlighted above. At that time, CPRE Sussex would like the opportunity to review this submission and add to, or modify it as necessary”

Campaign to Protect Rural England SECOND RESPONSE

CPRE has submitted a further letter which states that,

“We, the signatories to this joint letter, are writing to raise our concerns that committee meetings have been scheduled to consider the above applications in advance of the publication of responses to this final round of consultation from key statutory consultees including the South Downs National Park Authority, Natural England and Highways England.

These planning applications are of huge significance to local people. Over 1,300 people and a diverse range of local and regional organisations have already objected to the New Monks Farm application. These decisions should not be made in haste and without enabling local people, parish councils and other organisations time to respond to key evidence.

These premature meetings are not in the spirit of localism and transparency. We do not believe that Memorandums of Understanding produced on the day of the committee meeting or agreements to resolve key issues once permission is granted are adequate to address the concerns of the local community.”

This letter is signed by the following organisations:

CPRE Sussex, Lancing Parish Council, Sussex Wildlife Trust, Planning and Transport Campaigner, Brighton & Hove Friends of the Earth, Bricycles, The Brighton & Hove Cycling Campaign, Adur Residents Environmental Action, The British Horse Society, Lancing Manor SE Residents Network, Shoreham Society, Adur Floodwatch Group, West Beach Residents Association, Beachcroft Place Residents Association, West Beach Flood Action Group, Rotary Wing Users Representative - Shoreham Airport Consultative Committee

Sussex Wildlife Trust – 1st Letter - further letters below

Sussex Wildlife Trust objects to the application on the following grounds:

Adur Local Plan and the New Monks Farm Policy

“The Sussex Wildlife Trust has been commenting on the Adur Local Plan throughout its production. During this time we have raised concerns about the allocation of the greenfield site know as New Monks Farm, which forms a green gap between Lancing and Shoreham. In particular we are concerned about the impact on biodiversity, on site and in the nearby Adur Estuary SSSI. We are also concerned that the development of this area will impact on the District’s wider natural capital assets.

We would like to emphasise that the Sussex Wildlife Trust recognises the importance of a plan led system as opposed to a developer led process. Therefore we hope that our comments are used constructively to make certain that this development properly plans for the natural capital needed within the District and ensures that any development is truly sustainable.

We recognise the hybrid nature of the planning application, however we must consider the proposals against the parameters of the emerging local plan, prior to the main modification consultation being finalised and the plan being adopted.

The current emerging local plan states that the employment space allocation stands at 10,000m², however the application now proposes up to 32,900m². Such a major departure from the allocation for employment space will see further encroachment in to the strategic gap. This reaffirms concerns expressed at the examination of the local plan that an indicative boundary will see the strategic gap compromised. Page 45 of the Design and Access Statement (DAS) highlights how the proposals will compromise the gap with associated residential and commercial development.

We also seek clarification as to how this application will contribute to delivering Adur District Council’s responsibilities under the 2008 Climate Change Act. We particularly object to how this application and the consultation running on the A27 (Lancing to Worthing improvements) fail to consider one another’s proposals, despite being within 1.6 kilometres. We remind the Council of their commitment to sustainable transport in policy 29 Transport and Connectivity of the emerging Adur Local Plan.

Matters relating to the application

We wish to draw Adur District Council’s attention to the following matters relating to the application. We ask that they seek clarity from the applicant on these matters and rectify the insufficient nature of much of the ecological information before any planning decision is made:

Ecological Surveys

- *The revised phase one habitat report was undertaken from 2014 – 2017, however the surveys in September 2016 and February 2017, were carried out at sub-optimal times. This is against best practice and as such, the true composition of the site’s biodiversity may not properly represented and evaluated in this application.*

- *We are concerned about the quality of the bat surveys undertaken as part of this application. Within technical appendix 11.5 (status of resident bats) section 2.10 states 'that in order to establish bat activity patterns within New Monks farm a series of Seven bat activity surveys were undertaken.' However these surveys were all undertaken in September 2016, which does not comply with the Bat Conservation Trust Bat Survey for Professional Ecologist Good Practice Guidelines.*

In the information provided we have been unable to see how the ecologist has rated the site in terms of the habitat quality for bats, for example is it of low, moderate or high suitability for bats. This information is needed as it indicates the survey effort required to appropriately assess how bats utilise a site. However, even if the ecologist rates the site as having low habitat suitability, the surveys undertaken are not sufficient within the recommended guidelines. These state that for low habitat suitability, a minimum of one visit per season (Spring- April, May, Summer – June, July, August, Autumn - September, October) in appropriate weather conditions for bats is required.

Technical appendix 11.5 (status of resident bats) sections 2.10 shows that all bat activity surveys for New Monks Farm were carried out in September. Figure 11.4.1 indicates the location of the 3 transects and two buildings surveys, we are unclear why only these areas were selected.

Given the location of the activity surveys, couple with the lack of surveys throughout the season, we do not feel the information presented provides the Local Authority with enough information about how bats utilise the site, and subsequently the potential impact upon this protected species. We recognise that the appendix does make reference to other surveys but these were not specifically related to the development site and therefore were not designed to take account of the impacts of this development. We remind the Council of the requirements of paragraphs 98 and 99 of ODPM Circular 06/2005 Biodiversity and Geological Conservation – Statutory obligations and their impact within the planning system.

- *Barn Owl Survey (Appendix 11.6) - The Sussex Wildlife Trust notes that the desktop survey was only under taken for a 2km area rather than a 5km area as recommended in CIEEM - Shawyer, C.R. 2011. Barn Owl Tyto alba Survey Methodology and Techniques for use in Ecological Assessment: Developing Best Practice in Survey and Reporting. IEEM, Winchester. In addition observational surveys for the presence of barn owls on the site were undertaken in October and November 2016, The guidance states:*

'When observational surveys are to be conducted, these are best attempted during the late breeding season, usually between mid-June and during July (August to October for late or second broods). These are the months when prey deliveries to the nest become most frequent and commonly occur at dawn and dusk or sometimes during daylight hours.'

We are aware of recent barn owl records for this site; therefore we are not confident in the statement made in section 11.4.50 of the Environmental Statement (ES), which

indicates that there may no longer be barn owl present on the site. The applicant fails to consider how the site is used as foraging site for Barn Owls and as such the information presented does not provide adequate information for the Local Authority to make an informed decision on the impact of this development on Schedule One protected bird species.

- *We are concerned that the applicant states in section 11.3.37 of the ES that they did not carry out a structured breeding bird survey and relied on desktop surveys and incidental records. This is not acceptable for application of this nature and must be remedied.*

Country Park

- *We seek clarity from the applicant on the exact boundary and the size of the Country Park:*
 - *Page 25 of the DAS refers to the country park as only 27 ha*
 - *Page 26 of the DAS incorrectly attributes the country park to policy 13 of the emerging local plan instead of to policy 5.*
 - *Page 27 of the DAS says that the country park footprint is 28 hectares including the waterways. We would like clarity over which waterways are included in the calculation.*
 - *Page 39 of the DAS refers to an area where the residential area crosses the boundary and will follow the character of the country park.*
 - *Page 145 of the DAS states that the area of residential development that encroaches into the gap will be treated as homes within the country park. Given the previous two bullet points, we require a direct answer to the question: Will there be residential development within the boundary of the 28 hectare country park?*
 - *Additionally, have the two proposed football pitches for use by the Brighton and Hove football training centre been included within the country park boundary and calculated area? We seek an answer to this question as section 4.1.1 of the ES states that the development can be described as follows: 'A country park (including two additional football pitches related to the Brighton and Hove training ground)'. However the illustrative master plan for the country park shows them outside the country park boundary.*
- *Throughout the application we have identified information which indicates that the country park will include structures that may not fit the essential criteria needed to achieve accredited status for a country park. For example no more than 5% of a country park must be built upon¹. ¹ <https://www.gov.uk/guidance/get-accreditation-for-your-country-park> This needs clarifying.*

Site wide matters

- *The applicant talks about the permanent protection of the strategic gap in section 3.4 of the DAS, how do they intend to ensure this?*
- *What protections are in place during construction to ensure that the biodiversity within the ditches and subsequently the Adur Estuary SSSI via the outfall are not impacted by silt and debris from the construction process? We note that 11.5.9 and 11.5.10 of the ES refer to erecting tape and spray to reduce impacts but we question whether*

these measures fully consider the construction impacts and ask what the buffers that will be in place are.

- Section 11.5.55 of the ES states that the country park will dramatically increase the level of pedestrian/dog walkers, have the impacts of this increase activity been considered in relation to disturbance of ground nesting birds? Do the Council feel confident that the size of the country park is sufficient to deliver all the intended mitigation and recreational demands?*
- 11.5.63 of the ES states that the high levels of disturbance to Schedule One birds will be offset by providing a new perimeter drainage ditch on the eastern boundary. It suggests that if low disturbance levels can be maintained this should offset some of the surrounding disturbance. Can we ask how the applicant intends to ensure this area has low disturbance given the high demand for recreation and other mitigation within the parameter of the country park?*
- 11.7.10 recommends an Ecological Management Plan we would welcome more information on this, as this will be vital in understanding the long term aspirations for biodiversity on the site.*
- As we submit this response, we note application **AWDM/0961/17** for outline planning permission for the erection of new commercial buildings with an overall height of 14ms to provide up to 25000m² of floorspace with access, landscaping and associated infrastructure (including a new pumping facility on the River Adur), has been submitted at the airport. We are concern about the cumulative impacts of these two applications especially on the breeding bird habitat. We also seek clarity on the impacts of the addition of another pumping station on the status of the Adur Estuary SSSI.*

Enhancements and Net gains

*The Sussex Wildlife Trust **objects** to this application as it fails to adequately consider the biodiversity value of the site, impacts of the development and measures needed to achieve true net gains for biodiversity.*

However, if the council are minded to approve this application, we ask that they seek answers to the points we have raised above. We also remain deeply concerned about the lack of creative approaches to adding to the natural capital of the District as per vision 7 and objective 6 of the emerging Adur Local Plan.

We recognise that the application seeks to include a country park but given the high demands on this area for mitigations and recreation, it is vital that the importance of integrated biodiversity opportunities is not missed in a planning application of this magnitude. By failing to deliver net gains to biodiversity the applicant will be falling to deliver paragraph 109 of the Nation Planning Policy Framework.

- We have highlighted the presence of 2017 Barn Owl records, available from the Sussex Biodiversity Record Centre. Given that the application intends to demolish Daniels Barn, which is the location of these records, how do the applicants intend to provide roosting and foraging opportunities for barn owls in this application?*

- *The application talks about putting up bird boxes as enhancements. The phase one survey shows that the site is also used by ground nesting birds such as Sky Larks, we are keen for the applicant to demonstrate how they intend to provide for these grounds nesting species.*
- *The applicant has included an Otter Holt as an enhancement (11.7.9 ES). Given that otters are considered largely absent from Sussex, we would like to understand what has led to this suggested enhancement and wider improvements that might be needed to support this enhancement.*
- *Winter Breeding Bird surveys highlighted some important species, what step is the applicant taking to ensure these species are considered in biodiversity enhancements? How does the suggested enhancement of bird boxes benefit these species?*
- *Section 11.7.9 of the ES indicates soft landscaping for the site would include nectar and pollen rich flowers. We ask the council to ensure that the species used include native flora suitable to the location and are not limited to species such as Lavender and Rosemary.*
- *We support statement 11.7.10 which recommends a management plan for the application site. We seek further information on who would be responsible for the delivery, implementation and long term success of this?*
- *We suggest opportunities to include solar panels on the residential developments are included so that carbon footprint of the new development can be reduced. IKEA, which is a fundamental part of this development is now selling solar power systems and we cannot see why the residential development could not offer an opportunity to show case these Solar Panels.*
- *Information about the extent of the green roof still appears to be limited. We support the inclusion of the green roof, but would welcome further details and careful consideration about the most beneficial species for seeding.*
- *We can see many more opportunities for enhancements to pollinator species, by including green roofs on bin and bike storage areas.*
- *We would welcome electrical charging points for cars at properties, so that the development can offer a sustainable future.*
- *It is not clear if the impact of this development on the Local Nature Reserve (LNR) Shoreham Beach has been considered. The LNR is designated due to its sensitive vegetated shingle habitat. We suggest that this development should consider support for this site by ensuring money is available for a continued management plan to ensure that an increase in the population/visitors to the District, does not compromise this vulnerable habitat.*

During the Examination in Public for the emerging Adur Local Plan, we heard a lot from the developer about the need for viability on this site for development, we remind the council of their duties to biodiversity under section 40 of the NERC Act 2006 and ask them to ensure that viability is considered in all three elements of the NPPF definition of sustainable development.”

Sussex Wildlife Trust – 2nd Letter – Amended Plans - objects to the application on the following grounds,

Adur Local Plan and the New Monks Farm Policy

“The Sussex Wildlife Trust has commented on the Adur Local Plan throughout its production. During this time we raised concerns about the allocation of the greenfield site know as New Monks Farm, which forms a green gap between Lancing and Shoreham. In particular we are concerned about the impact on biodiversity on site and in the nearby Adur Estuary SSSI. We are also concerned that the development of this area will impact on the District’s wider natural capital assets.

We emphasise that the Sussex Wildlife Trust recognises the importance of a plan led system as opposed to a developer led process. Therefore we hope that our comments are used constructively to make certain that this development properly plans for the natural capital needed within the District and ensures that any development is truly sustainable.

Matters relating to the additional information

We note that section 11.1.4 of the Environmental Statement (ES) additional information states:

‘Following amendments to the proposals since submission of the Planning Application this Chapter has been updated entirely and replaces the version within the Environmental Statement along with associated Figures and Appendices’.

However the Sussex Wildlife Trust is concerned that this additional information is not underpinned by an updated evidence base. In our original objection we noted that the ecological information submitted was not up to date or in accordance with methodologies required for best practice and it appears that these objections have still not been addressed. Please see Appendix 1 of this response for a list of concerns relating to the adequacy of the application’s environmental information.

Information relating to cumulative impact with the Shoreham Airport development (Ref. AWDM/1093/17) is limited in scope. Given the limited environmental information provided with that application, we are unclear of how the cumulative impact can be adequately assessed.

Following the initial consultation for this New Monks Farm application, Natural England requested the following information:

- *Impacts and mitigation measures both individually and cumulatively with the Shoreham Airport application (AWDM/1093/17) on the South Downs National Park Protected Landscape.*

- *Impacts and mitigation measures proposed for the River Adur SSSI by both the above application and cumulatively with the proposed Shoreham Airport Proposal (AWDM/1093/17).*

We ask Adur District Council to ensure that the statutory body feels the additional information now provided is sufficient to make an informed decision about the impacts of this application on its own and in combination with the proposed airport application.

Enhancements and net gains

We recognise that the application now contains information that will ensure it compensates for the loss of Salt Marsh habitat due to the pumping station, and that it intends to deliver a net gain of 70m² of Salt Marsh habitat. However this application as it stands fails to adequately consider the wider impacts of the development. Measures are needed to achieve true site-wide net gains for biodiversity.

We remain deeply concerned about the lack of creative approaches to adding to the natural capital of the District as per vision 7 and objective 6 of the adopted Adur Local Plan.

We recognise that the application seeks to include a country park but given the high demands on this area for mitigation and recreation it is vital that opportunities for integrated biodiversity are not missed in a planning application of this magnitude. By failing to deliver net gains to biodiversity the applicant will be failing to deliver the ethos of paragraphs 9 and 109 of the Nation Planning Policy Framework.

Whilst the application suggest some mitigation and supposed net gains, we do not think these are all appropriate or sufficient. In particular:

- *The application talks about putting up bird boxes as enhancements. The phase one survey shows that the site is also used by ground nesting birds such as Sky Larks, we are keen for the applicant to demonstrate how they intend to provide for these grounds nesting species.*
- *The applicant has included an Otter Holt as an enhancement (11.7.9 ES). Given that otters are considered largely absent from Sussex, we would like to understand what has led to this suggested enhancement and wider improvements that might be needed to support this enhancement.*
- *Winter Breeding Bird surveys highlighted some important species, what step is the applicant taking to ensure these species are considered in biodiversity enhancements? How does the suggested enhancement of bird boxes benefit these species?*
- *Given the number of reptiles requiring translocation due to the Adur Tidal Walls scheme and proposed in this application in combination with the airport application, do the Council feel confident that this level of translocation is feasible or agreeable to the statutory agencies.*
- *We support statement 11.7.10 which recommends a management plan for the application site. We seek further information on who would be responsible for the delivery, implementation and long-term success of this?*

- Section 11.5.62 of the ES states that the country park will dramatically increase the level of pedestrian/dog walkers, have the impacts of this increase activity been considered in relation to disturbance of ground nesting birds? Do the Council feel confident that the size of the country park is sufficient to deliver all the intended mitigation and recreational demands? What management is needed to manage this increase in visitors? Should further off site mitigation be explored?
- We suggest opportunities to include solar panels on the residential developments are included so that carbon footprint of the new development can be reduced. IKEA, which is a fundamental part of this development is now selling solar power systems and we cannot see why the residential development could not offer an opportunity to show case these Solar Panels.
- We can see many more opportunities for enhancements to pollinator species, by including green roofs on bin and bike storage areas.
- We would welcome electrical charging points for cars at properties, so that the development can offer a sustainable future.

During the Examination in Public for the emerging Adur Local Plan, we heard a lot from the developer about the need for viability on this site for development, we remind the council of their duties to biodiversity under section 40 of the NERC Act 2006 and ask them to ensure that viability is considered in all three elements of the NPPF definition of sustainable development.

Appendix 1

We wish to draw Adur District Council's attention to the following matters relating to the application. We ask that they seek clarity from the applicant on these issues and require that they rectify the insufficient nature of much of the ecological information before any planning decision is made:

Ecological Surveys

- The revised phase one habitat report was undertaken from 2014 – 2017, however the surveys in September 2016 and February 2017, were carried out at sub-optimal times. This is against best practice and as such, the true composition of the site's biodiversity may not be properly represented and evaluated in this application.
- We are concerned about the quality of the bat surveys undertaken as part of this application. Within technical appendix 11.5 (status of resident bats) section 2.10 states 'that in order to establish bat activity patterns within New Monks farm a series of Seven bat activity surveys were undertaken.' However, these surveys were all undertaken in September 2016, which does not comply with the Bat Conservation Trust Bat Survey for Professional Ecologist Good Practice Guidelines.

In the information provided we have been unable to see how the ecologist has rated the site in terms of the habitat quality for bats, for example is it of low, moderate or high suitability for bats. This information is needed as it indicates the survey effort required to appropriately assess how bats utilise a site. However, even if the ecologist rates the site as having low habitat suitability, the surveys undertaken are not sufficient within the recommended guidelines. These state that for low habitat

suitability, a minimum of one visit per season (spring- April, May, summer – June, July, August, autumn - September, October) in appropriate weather conditions for bats is required.

Technical appendix 11.5 (status of resident bats) sections 2.10 shows that all bat activity surveys for New Monks Farm were carried out in September. Figure 11.3 (Location of bat activity surveys) indicates the location of the 3 transects and two buildings surveys, we are unclear why only these areas were selected.

Given the location of the activity surveys, coupled with the lack of surveys throughout the season, we do not feel the information presented provides the Local Authority with enough information about how bats utilise the site, and subsequently the potential impact upon this protected species. We recognise that the appendix does make reference to other surveys but these were not specifically related to the development site and therefore were not designed to take account of the impacts of this development. We remind the Council of the requirements of paragraphs 98 and 99 of ODPM Circular 06/2005 Biodiversity and Geological Conservation – Statutory obligations and their impact within the planning system.

Country Park

- *Having viewed the information on the website we have been unable to locate updates to the Design and Access statement (DAS). We seek clarity from the applicant on the following matters:*
 - *Page 25 of the DAS refers to the country park as only 27 ha*
 - *Page 26 of the DAS incorrectly attributes the country park to policy 13 of the emerging local plan instead of to policy 5.*
 - *Page 27 of the DAS says that the country park footprint is 28 hectares including the waterways. We would like clarity over which waterways are included in the calculation.*
 - *Page 39 of the DAS refers to an area where the residential area crosses the boundary and will follow the character of the country park.*
 - *Page 145 of the DAS states that the area of residential development that encroaches into the gap will be treated as homes within the country park. Given the previous two bullet points, we require a direct answer to the question: Will there be residential development within the boundary of the 28 hectare country park?*
 - *Additionally, have the two proposed football pitches for use by the Brighton and Hove football training centre been included within the country park boundary and calculated area? We seek an answer to this question as section 4.1.1 of the original ES stated that the development can be described as follows: 'A country park (including two additional football pitches related to the Brighton and Hove training ground)'. However the illustrative master plan for the country park shows them outside the country park boundary.*
- *Throughout the application we have identified information which indicates that the country park will include structures that may not fit the essential criteria needed to achieve accredited status for a country park. For example no more than 5% of a country park must be built upon¹. ¹ <https://www.gov.uk/guidance/get-accreditation-for-your-country-park> This needs clarifying.*

Site wide matters

- *The applicant talks about the permanent protection of the strategic gap in section 3.4 of the DAS, how do they intend to ensure this?*
- *Section 11.5.62 of the ES states that the country park will dramatically increase the level of pedestrian/dog walkers, have the impacts of this increase activity been considered in relation to disturbance of ground nesting birds? Do the Council feel confident that the size of the country park is sufficient to deliver all the intended mitigation and recreational demands? What management is needed to manage this increase in visitors? Should further off site mitigation be explored?*
- *Section 11.5.70 of the ES states that the high levels of disturbance to Schedule One birds will be offset by providing a new perimeter drainage ditch on the eastern boundary. It suggests that if low disturbance levels can be maintained this should offset some of the surrounding disturbance. Can we ask how the applicant intends to ensure this area has low disturbance given the high demand for recreation and other mitigation within the parameter of the country park?*
- *Section 11.7.10 recommends an Ecological Management Plan we would welcome more information on this, as this will be vital in understanding the long-term aspirations for biodiversity on the site."*

Sussex Wildlife Trust – (Final Response)

"The following objection is made on behalf of the Sussex Wildlife Trust in relation to the Hybrid Planning Application AWDM/0961/17 following the submission of further information in May 2018. We have previously submitted comments relating to biodiversity for this application and we wish to highlight that our previous comments submitted on 10/09/2017 & 13/02/2018 still stand."

Green Roof and Visual Impact of Northern Elevation of Commercial property

We note the increase in the total area of green roof, particularly in the Northern edge of the roof space. However at this point we are unclear of the species that will be used to deliver the green roof structure and still feel concerned that this is a token gesture rather than a considered attempt to address visual impact. We remind the council that the South Downs National Park Authority stated in its objection dated 12/03/2018 that:

If it is not possible to provide a green roof across the full footprint, has any consideration being given to a green wall on the Northern Elevation?

From the new information, we see no evidence relating to how the applicant has considered the implementation of a green wall on the Northern Elevation, instead information relates to the installation of a louvre screen. We would welcome a progressive approach from the applicant to install a green wall on the northern façade of the commercial development so that issues of visual impact can be addressed. There are a

number of other added benefits that could be derived from green walls including water management, particulate capture and noise reduction.

Impacts from Pumping Station

The application is now accompanied by a report on the impact of the NMF pumping station on the Adur Estuary SSSI, in response to the comments from Natural England to both this application and that for Shoreham Airport application (AWDM/1093/17). Having read this report we are concerned that it is narrow in its approach and has failed to consider the impact on wading birds, which are designating feature of the Adur Estuary SSSI as stated in the citation for the site. We remind the council that Natural England's response dated 09/03/2018 objected to the application as they were concerned it may:

- Have a significant impact on the purposes of designation of the South Downs National Park (SDNP);
- Damage or destroy the interest features for which Adur Estuary Site of Special Scientific Interest (SSSI) has been notified.

To our knowledge Natural England have yet to submit further comments in relation to the new information. However we question whether the additional information provided answers the concerns raised by Natural England and therefore the Council are not in a position to determine this application.

We note that the Environment Agency have resubmitted their comments from 28/02/2018. We ask the council to ensure that the conditions set by the Environment Agency that support the protection and enhancement of biodiversity are set as a minimum for this application.

We ask the council to consider their responsibilities under section 40 of the NERC Act 2006 and ensure that relevant ecological information to support this application is provide before it proceeds any further. It is not acceptable to leave this element of the application to the reserved matters process."

The South Downs National Park objects to the application and comments that,

"Summary SDNPA Response

It is recognised that the application site is allocated in the Adur Local Plan, which has now been adopted. The South Downs National Park Authority does not object to the principle of the allocation and what the policy seeks to provide on the site. The SDNPA does however still have significant concerns based on how this policy has been interpreted in the current application and therefore objects to the proposed development on the following grounds:

- Insufficient mitigation response to the setting of and Purposes of the National Park;
- Overly simplistic approach to landscape character in the LVIA, which is considered to have led to landscape impacts being underestimated;
- Scale, appearance and form of the commercial element (and associated car park) in particular causes significant harm to landscape character and in views to and from the

National Park, including heritage assets which contribute to this character, with inadequate mitigation measures proposed;

- Harm to International Dark Night Skies reserve;*
- The cumulative impact of the development, along with proposed development at Shoreham Airport, on the setting and Purposes of the National Park.*

These objections are set out in more detail below.

It is considered that overall the application appears incomplete and a number of issues remain unresolved (access, traffic concerns, visual impact, lighting impact). It is considered many of the opportunities to deliver positive impacts through the scheme remain unaddressed, and key impacts are outstanding and remain poorly mitigated if at all.

These concerns are considered to be surmountable and advice has been offered to the applicant on how this could be resolved. Despite, however, some minor positive amendments being made, the proposal has not gone far enough to resolve the harm caused to the setting and Purposes of the SDNP. The Major Adverse impact of the development on the SDNP is demonstrated in the evidence produced by the applicant, for which the mitigation measures proposed fall a long way short of resolving the identified harm. The commercial aspect, adjacent to the proposed residential scheme and the SDNP, fails to recognise this sensitive location and proposes a rather standard industrial building. Ultimately, the proposed commercial development (including the car parking) needs to be reconsidered using the evidence generated by the LVIA and guidance from the applicant's own team, particularly in terms of form, layout and treatment on the northern elevation (and potentially north-eastern corner). This is a major development on the edge of the National Park and it is disappointing opportunities to provide a high-quality design have not been taken. The sensitive location is an opportunity to respond to landscape and achieve good design, rather than simply mitigate the adverse impact the current scheme has. The importance of corporate branding, whilst recognised, but unmodified, does not outweigh this harm.

During our ongoing discussions, concerns were also raised regarding connectivity between the existing residents on the south side of the A27 and the National Park being further severed and access opportunities reduced as a result of the development. The applicant has sought to overcome this through the proposed upgrade of the public footpath to a bridleway along the west bank of the River Adur (to the south of the A27) as part of this application. A further application has also been submitted to the SDNPA on 24 January 2018 (SDNP/18/00434/FUL), to provide a Public Right of Way link from the upgraded route to Combes Road, which is currently under consideration. If approved, this will contribute significantly towards overcoming the concerns raised previously regarding access.

Summary of site

The site is located to the east of Lancing and west of the River Adur. This landscape is coastal and located alongside the Adur estuary. By virtue of this location, the landscape is naturally low-lying, the vast majority of which lies within flood zone 3. This location creates the foundation of the landscape's character as a coastal floodplain – it lies within the

National Character Area South Coast Plain and Hampshire Lowlands. This landscape is one part of a series of remnants of the huge coastal floodplain encroached by expanding settlements relatively recently - over the past 90 years. This has left a series of landscape 'gaps' which characterise this stretch of coastline as a succession of 'windows' with views to the sea from the South Downs. As identified in the West Sussex County Council Landscape Character Appraisal, this site is one of these coastal gaps.

The site lies within a complex landscape displaying significant time-depth. The site includes within it evidence, and in some cases surviving landscape elements, from the early post-medieval (c.1500) period right up to present day. This however doesn't mean there are not elements surviving from before and indeed after this time – its time-depth means numerous periods are represented as elements or features within this landscape. Evidence of the medieval salt-workings remain extant within the landscape, the rifes and ditches in the landscape are associated with this activity in the early medieval period – and it is this which imbues the character of this central part of the landscape today. Recent mapping over shows these remain unchanged for over 150 years, despite some land-raising of aggregate waste.

Detailed SDNPA Response **Landscape Character**

There has been an overly simplistic approach to landscape character in the LVIA, which results in an underplayed assessment of how the proposed development would impact on the setting of the SDNP. Whilst there have been some changes made to the LVIA, it remains insufficient and lacking in terms of the understanding of the relationship between the floodplain of the application site and the SDNP, as well as the cultural heritage associated with the Downs. As a result, impacts could have been either missed or reduced in severity.

The cumulative impact of the proposed development here and at Shoreham Airport also needs to be fully understood and addressed in the development proposals for both – particularly as both proposals expand the site boundaries, reducing the openness of the floodplain, which shares an important relationship in terms of understanding the landscape character of this part of the SDNP.

Views and Visibility

The residential development proposed is capable of being seen in the context of Lancing and no objection is raised to this element. The commercial building is however much larger and represents a very different form of development, in a more prominent location. The large, block style and format, clad fully using the IKEA brand colours, will further exacerbate the incongruity within the setting and character of the area and the close relationship with the South Downs. The West Sussex Landscape Character Appraisal for the coastal 'gaps' <https://www.adurworthing.gov.uk/media/media,139364,en.pdf> including this one, has a recommendation under land management guidance for new large agricultural/industrial building to 'carry out colour and design studies for industrial and large farm buildings'. Despite this being requested in the SDNPA's earlier comments, the SDNPA has not been able to find any evidence of the colour and design studies undertaken for this scheme. It is noted that there has been a reduction in the overall

height of the commercial building by 1m, but this does little to overcome the fundamental concerns regarding the appearance, massing and bulk of the building.

It is acknowledged that the additional viewpoints south of the application site, looking north towards the SDNP, and manner of taking the viewpoint photographs have been updated. It is also noted that the Country Park is no longer explicitly treated as a mitigating influence for the IKEA building and car park. There does remain a reliance on the 'Park' area to the east of the IKEA car park and the planting along the northern boundary of both the building and car park, to mitigate the Major Adverse impact of the proposed development. As discussed there is significant doubt that this will provide the mitigation necessary to resolve this impact.

As discussed at our meeting on 22 February 2018, the SDNPA remain doubtful that this will have the desired effect, or that planting along the northern boundary in particular would even be achievable. The tree buffer to the front of IKEA would not provide the level of screening that appears to be alluded to in the application documents. Whilst there is more substantial planting around the large car park, this will do little to reduce the impact of the vast expanse of hard surface proposed, or the glare resulting from cars parked there, in particular when viewed from higher ground within the SDNP. It is noted that indicative landscape principles have now been provided for the car park area. These do not however address the significant impact of the car park in views from the SDNP, nor how the landscape principles relate to the planting proposed around the car park periphery (as these are being dealt with by different consultants). There is also a reliance on a tree belt to the north of the weighbridge in the ownership of Highways England, for screening purposes, over which the applicant has no control. Therefore it is considered that the mitigation proposed would be inadequate and would not overcome the Major Adverse impact on the SDNP identified in the applicants LVIA.

The effect of the small area of green roof proposed at distance is lost as it will remain overwhelmed by the scale of the rest of the building and the carpark area exposed in views. Proposing such a small area is arguably a token gesture rather than a genuine attempt to minimise visual impact and improve the sustainability of the scheme. If it is not possible to provide a green roof across the full footprint, has any consideration been given to implementing a green wall on the northern edge?

In summary, the broad brush approach taken in the LVIA oversimplifies the impact the proposal has on the character of the setting of the SDNP and the relationship the site shares with its surroundings. Despite being advised of the significant concerns the SDNPA (and other consultees) has, there has been no effort to address the fundamental problem related to the overall visual impacts of the IKEA. This is, in effect a very large industrial looking shed, for which simply mitigation planting is not the answer.

Dark Night Skies

The assessment of the ambient lighting conditions is consistent with those showing on the sky quality measurements for the area and it is agreed that the general level of lighting is E2 according to the Institute of Lighting Professionals. The general area does show up as a consistent bright urban 'red' spot on the sky quality map, which also shows very little in the way of intrinsic dark skies. The main areas of darkness lies to the immediate east and west

and further north, with the far eastern edge of the dark skies core (zones E0 and E1) within around 10km. From a SDNPA Dark Skies view, this area of the National Park immediately adjacent to this development and north of the A27 would be classified as a 'transitional' area between progressive darkness and urbanisation. While conditions do not suggest classification as a 'dark sky' they still remain of importance to protect from light pollution, as they act as a barrier to darker areas, and in isolated local locations, may measure favourably. Consequently, it is important that the general sky conditions do not degrade and push back these transitional areas.

It is welcomed that the development in general proposes dark night sky friendly fittings on appropriate switching and dimming modes throughout. The luminaires suggested will probably achieve E1 level of compliance and due to technological availability, it would be recommended that all luminaires achieve this grade. This is particularly easy to achieve on residential and car park lighting as much of the surrounding area will have these fixtures as design standard. The use of curfews on closing will be of great importance in this respect, and could be secured by conditions restricting the hours of operation.

The residential area should present little impact on dark skies. As there is a fair amount of housing already in the area, the addition of this housing is unlikely to significantly degrade the sky quality or the view. Providing that a suitable lighting design and regime is designed, the impact of this lighting will be low. The housing would result in a re-zoning of the E2 to an E3 zone. The addition of a community centre and education facilities will increase the local impact, but with effective design and use this could be minimised.

The introduction of a commercial zone, however, does potentially present a threat to the general level of darkness and to the surrounding views. The resultant increase in ambient quality will have a detrimental impact on sky quality to the North and upon Lancing College. This is shown on page 18 of the External Lighting Assessment, which shows an increase reddening of the sky in the commercial area. Given that the lighting requirements of both the luminaires and the resultant surface illuminance will be significantly higher than the residential zones (30 lux rather than 10 lux) there is the potential to create a significant lighting introduction. As a comparison, 30 lux is the suggested surface illumination for an ME2/CE1 road class which aims to provide 'city centre' levels of lighting. It is therefore not unreasonable to suggest that this would mean a re-zoning from E2 to E4 (Rural to City centre) for the area. The effect of which is to place the lighting of a city centre immediately South of an area of increasing darkness with little barrier. While this may not impact on the quality of key core areas, it will inevitably reduce conditions in the National Park. It would be more favourable if the commercial zone was located further south in this respect. Therefore, the lighting scheme proposed would need to be substantially revised.

Another impact is the visibility of the commercial zone. Although dark sky friendly fittings are suggested throughout, the increase in surface illumination, will create a noticeable lighting impact, particularly with the illumination of the car park, the internal spill of the shop itself and any illuminated signs, which would be more prominent. In that respect the development is more likely to stand out against the surrounding residential zones. Although the glare would probably be within ILP recommendations, the addition of a

large, bright source of lighting would have a detrimental impact on the viewpoints of the South Downs which would look out on a progressively brightening urban landscape.

The additional night-time lighting survey report, which has recently been submitted does not, somewhat surprisingly, consider the impact of the proposed development. Therefore, no mitigation has been proposed to adequately address the concerns raised previously.

To summarise, the development will introduce significant new lighting that has the potential to impact on the dark skies and view within the South Downs. The introduction of a commercial zone will create city centre lighting conditions immediately adjacent to the National Park and areas of progressive darkness. While the core dark skies are located some distance and are unlikely to be immediately affected, the impact on these transitional areas is considered unacceptable, as the overall sky conditions are likely to reduce – as noted in the external plan. The residential zone impact is much less and is unlikely to significantly impact on dark skies or views. The use of dark sky friendly lighting is welcomed as this will help reduce the impact. However, the sheer illumination of the commercial zone in that area, is likely to conflict with the aims of the National Park to protect its dark skies, unless the lighting scheme proposed is significantly revised or the IKEA complex is re-positioned.

Access and Connectivity to the SDNP

The SDNPA seeks to promote sustainable travel to the National Park to reduce the impacts of traffic within it and to promote healthy lifestyles. The A27 presents a significant barrier between the population of the coastal plain and the National Park. This is particularly true for non-motorised users (NMUs) and for communities along the coastal strip including Worthing, Lancing and Shoreham. While there are some good non-motorised user (NMU) routes such as the Downs Link at Shoreham, other historic rights of way have been severed by the A27 and where crossings exist they are few and far between, often at grade and considered dangerous to use because of volumes and speed of traffic. The PROW network north of A27 includes footpaths and bridleways which link directly to the South Downs Way National Trail and to other key sites such as Cissbury Ring, but accessing these from south of the A27 is difficult.

It is noted the site allocation policy (Policy 5 of the emerging Local Plan) requires the developer to provide improved access across the A27 to the South Downs National Park for pedestrians, cyclists and equestrians. The scheme proposes the closure of the NMU crossing provision currently provided at the Sussex Pad junction, and proposes a light controlled crossing provision at the new roundabout on the A27, with a shared path running along the northern carriageway in both an eastwards and westwards direction connecting with Coombes Road. This alone would result in a reduction in access and increased severance, which would be in conflict with the second Purpose of the National Park. Also a light controlled crossing would interrupt traffic on a roundabout. The SDNPA would welcome improved provision for NMUs to cross the A27 at grade separated from the highway, for example via a bridge or underpass sympathetically designed with reference to the special qualities of the National Park. The potential provision is identified as a priority in the ongoing Shoreham Area Sustainable Transport Package study.

Following discussion, an application has now been submitted to the SDNPA, to provide an additional NMU route from the existing public right of way along the western edge of the River Adur to connect with the wider network at Combes Road. Without prejudice, if approved, along with the revised proposals to upgrade the existing footpath to a bridleway, this would go some way towards mitigating the concerns raised regarding severance. The application is still being considered and the SDNPA will continue to liaise with Adur DC and WSCC throughout the assessment. If approved, the provision and ongoing maintenance of the route would need to be secured through a S106 Agreement, or the adoption of the route by WSCC, whilst also securing appropriate signage from within the New Monks Farm development.

There are other opportunities that could also be further explored, including better connectivity to the coastal cycle route to the south the NCN2, which the SDNPA would encourage the applicant to investigate.

Traffic Impacts

It is noted that there have been concerns raised to the scheme on traffic impact grounds by both Highways England and WSCC Highway Authority, although it is understood that work has been undertaken by the applicant to address these. The SDNPA would defer to their expertise on such matters, but wish to highlight its agreement with the original comments made by WSCC and Highways England regarding development impacts, car parking and the suitability of the NMU infrastructure.

The SDNPA advocates for an integrated and joined up approach (between all parties) to the design of the mitigation for impacts on the SDNP, including NMU access to the SDNP. Any new infrastructure should be accessible to the largest possible range of users and therefore be designed to take into account the needs of walkers, cyclists, horse riders and people with disabilities.

Water Environment

The water courses affected by the development are outside of the National Park and drain into the Adur Estuary, so there is no impact on water quality in the National Park, however it is noted there are areas of important salt marsh in the estuary.

The SDNPA welcomes the retention and enhancement of open water features on the site, including the introduction of SuDS measures such as the use of swales and also incorporation of these features into the Country Park. The SDNPA would encourage use of native plant species both to create a natural environment and also as an integral part of a SuDS scheme, assisting water quality.

It will be for the Lead Local Flood Authority and AWC's own drainage specialists to conclude whether the measures proposed to address surface water drainage on leaving the site are appropriate and whether there is sufficient capacity in the current systems to cope with the additional loads.

Conclusion

For the reasons given above, the SDNPA objects to this development. We would welcome working with Adur and Worthing DC and the applicant, to help secure a scheme that responds to our concerns.

South Downs National Park (Final Response)

*“These comments should be read alongside our original response, which raised an objection to the proposed development. Summary: It is good to see that some steps have been taken to attempt to address the significant landscape concerns raised through the consideration of this development. Unfortunately, the measures proposed are considered to fall short of mitigating the major adverse harm identified on the character of the South Downs National Park and in views to it. The SDNPA agrees that the mitigation steps outlined in the Sheils Flynn comments are necessary to have a more demonstrable impact on the major adverse effect on the character of, and in views to and from, the SDNP. Whilst the SDNPA does not object to the principle of the allocation, there remain significant concerns regarding how the policy has been interpreted, with particular regard to the commercial element of the proposed scheme. Therefore, the SDNPA **maintains its objection to the proposed development**. The following comments provide further clarification of why this objection is maintained, in light of the revisions and additional information submitted thus far, but also indicate details the SDNPA would advise be conditioned in the event of the development being approved.*

General

1) There is no real overarching approach to the mitigation, to help it join up and address the fundamental concerns raised in our earlier comments. More investigation of options regarding the north elevation treatment in particular could have been provided to demonstrate which option would have the most successful impact.

2) The need for signage is understood, but there is still indicative signage being shown on the northern elevation. This would be rather pointless if the mitigation planting proposed is meant to be successful and therefore calls into question the consideration these measures have been given.

3) The SDNPA has read the further landscape comments provided to Adur District Council by Sheils Flynn and concurs with conclusions regarding the cumulative landscape and visual effects of the New Monks Farm and Shoreham Airport developments and the key mitigation responses that are still required, as outlined in the summary of the Sheils Flynn comments.

4) The impact of lighting, with particular regard to the commercial element of the scheme, has not been addressed, in any of the measures proposed. Conditions could be imposed to request an updated and revised lighting strategy, however to date; there has been no acceptance by the applicant that this matter needs to be further considered.

5) Tree planting generally will have 3 roles to play and, if approved, should be conditioned accordingly:

- Maintaining the enclosed 'foot of the Downs' character, which would be achieved by virtue of a characteristic planting pattern,
- Achieving the visual softening of the bulk and scale of the IKEA building in key views, notably from within the SDNP, and,
- Providing a key part of the drainage strategy (particularly with regard to the car park).

6) The proposed development will lead to an increase in traffic. Whilst the SDNPA has deferred to the relevant highway authorities regarding matters of highway impact, in the event permission is granted, it is requested that consideration is given to noise reducing tarmac when the alterations to the A27 are made.

7) In the event planning permission is granted (for this scheme and the proposed creation of a new non-motorised user route in the SDNP – ref: SDNP/18/00434/FUL), the SDNPA would expect to be party to a Section 106 Agreement, details of which should include (but are not limited to) signage to the upgraded right of way and indication users are entering the National Park.

Specific Measures

8) Increased green roof. According to the most recent plans, this appears to be only indicative and the exact amount and location shown on the plans is not definitive. The SDNPA request this be secured in this location and for an area no smaller than shown, by way of condition, if the application were to be approved. Species, planting and management/maintenance should also be conditioned, as the green roof is part of the external appearance, rather than landscaping.

9) Additional planting on northern boundary. More planting is proposed north of the car park and an additional belt immediately to the north of IKEA is indicated. The SDNPA would have expected to see the Landscape Principles document updated alongside this change, given landscaping remains a reserved matter. It would also have been expected there to have been more evidence produced to demonstrate the planting in this location will be successful, given the concerns raised previously by both the SDNPA and Adur's own Landscape Consultant.

10) Louvres on north elevation. Prior to the formal submission being made, some photographs of examples of these louvres were sent, but they do not form part of the application and therefore can't be considered. More evidence to demonstrate that these will be successful is required. The SDNPA also require further information regarding the size of the louvres (i.e. how far they stick out from the building), sections demonstrating the angle they will be installed at and distance between each slat (it is noted that this will be graded across the elevation), and evidence of how the 2 proposed colours would work together (i.e. the IKEA blue and dusty grey). If this were demonstrated to be a successful mitigation option, it should also wrap around the north-eastern corner. As stated above, if the louvres are to be successful, they should cover the whole of the northern elevation. Therefore, no space should be retained for potential advertisement in this location. It is possible that these details and requirements could be secured by planning condition.

11) Car park reconfiguration. It is positive to see some more planting, but the SDNPA remain unconvinced this would address the fundamental concerns raised previously

regarding the impact of such a large expanse of tarmac and cars, particularly in views from Mill Hill. More information is still needed regarding tree species (see above). The key aim of its design should be centred around creating a nature-inspired planting (i.e. not straight lines of trees) to minimise harm, in order to conserve the character of the SDNP.

Natural England (First response).

*As submitted, the application could have potential significant effects on **The South Downs National Park Protected Landscape and Adur Estuary SSSI**. Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation.*

In response to the revised application and further information to the Environmental Statement, Natural England objects to the application on the following grounds,

Natural England objects to this proposal. As submitted we consider it may:

- have a significant impact on the purposes of designation of the South Downs National Park (SDNP);*
- damage or destroy the interest features for which Adur Estuary Site of Special Scientific Interest (SSSI) has been notified.*

Natural England (final response) objects to this proposal. As submitted we consider it may:

- Have a significant impact on the purposes of designation of the South Downs National Park (SDNP) Natural England's advice on other natural environment issues is set out below. We have reached this view for the following reasons:*
- The commercial element of the proposal has significant landscape/visual impacts on the statutory purposes and setting of the SDNP There may be scope for amendments to the design of the proposal that could mitigate the landscape/visual impacts. This might include: Page 2 of 6*
- Amendments/improvements to the façade of the commercial building (particularly the northern façade);*
- Increasing the size of the green roof;*
- Improving soft landscaping, layout and surfacing in the car park.*

The site is located adjacent to the Adur Estuary Site of Special Scientific Interest (SSSI). We advise a Mitigation Scheme, which includes saltmarsh creation, and a drainage scheme detailing mitigation for freshwater overspill onto the SSSI, is secured by planning condition. Construction timings outside the wintering bird season may also need to be secured by condition. Further information on landscape issues and mitigation of impacts to the SSSI is provided in Annex A.

Annex A - Landscape & Visual Impact on the Setting of the South Downs National Park

Natural England is a statutory consultee for any development scheme requiring an Environmental Impact Assessment (EIA). We therefore have a duty to provide advice to the local planning authority on this proposal. As the EIA includes a landscape component, our advice can cover landscape issues, particularly where landscape and visual impacts on or within the setting of a designated site (Area of Outstanding Natural Beauty (AONB) or National Park) are significant. The proposed development lies within close proximity to the South Downs National Park (SDNP), and is considered to lie within its setting of the SDNP. We therefore advise the local planning authority that, under Section 11A(2) of the National Parks and Access to the Countryside Act 1949, section 17A of the Norfolk and Suffolk Broads Act 1988 and section 85 of the Countryside and Rights of Way Act 2000, 'in exercising or performing any functions in relation to, or so as to affect, land' in National Parks and Areas of Outstanding Natural Beauty, relevant authorities 'shall have regard' to their purposes. This duty is particularly important to the delivery of the statutory purposes of protected areas.

The duty applies to all local planning authorities, not just national park authorities. The duty is relevant in considering development proposals that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which might have an impact on the setting of, and implementation of, the statutory purposes of these protected areas. In our previous response to the proposals (ref: 236230, dated 09 March 2018), Natural England explained its concerns regarding the landscape and visual impact of the commercial element of the proposal on the statutory purposes and setting of the SDNP. This advice remains valid.

We maintain the information submitted to date does not provide sufficient evidence that significant impacts on the setting of the SDNP can be suitably mitigated. Despite the amendments to the northern façade, northern boundary, green roof and car park of the commercial area, the Landscape and Visual Impact Assessment (LVIA) still identifies major adverse visual effects at viewpoints within the SDNP. The currently proposed mitigation measures do not go far enough to reduce these effects. We reiterate our view that the mitigation measures should be further revised to reduce the visual effects to an acceptable level, and our advice regarding each of the amendments is provided below.

We hope our comments are helpful and can be used constructively to reach an acceptable solution to the commercial element of this proposal.

Northern Façade and Northern Boundary

We understand that additional information is to be provided by the applicant in respect of the northern façade of the commercial building and landscaping along the northern boundary. We would be happy to comment further and/or revise our advice once this additional information has been submitted, but the following is provided based on the information available to us at this present time. It is our current understanding that 'neutral' coloured fins/louvre panels are to be added to the northern façade of the commercial building to 'break down the scale and reduce the amount of visible blue cladding'. Measures to reduce the visual impact of the building are welcomed, however the images submitted are not clear and do not indicate the colour or the perceived effect of the proposed louvre panels. The building still appears to remain as a prominent block-style building in bold blue and yellow colours. It is acknowledged that the commercial building

may be coloured to minimise its visual impact. However, given the height and expanse of the proposed building, the choice of colours should be carefully considered, to accord with the changing colours in the surrounding landscape during the year.

As submitted, mitigation of the visual impact of the building still appears to rely heavily on additional 'cosmetic' landscape works (tree screens) instead of sympathetic building design. In this case, it is not considered practical or even possible to mask a building of this size and massing with a planted tree screen, particularly for longer ranging and more elevated views into the site. This is particularly the case where deciduous trees are proposed, as their visual screening potential is reduced during winter. This is not to say that tree planting need not be included with the scheme; it is acknowledged the trees are likely to provide wider environmental benefits and may help to 'soften' the close ranging and lower level views into the site, and we would recommend native species of local provenance are used. Nevertheless, the effectiveness of the tree screens as visual mitigation for what is still a very large and imposing structure should not be overplayed. Instead, design alterations to the building itself including (for example) different materials, colour treatments and textural finishes (particularly on the northern façade) would result in the building making a less negative contribution to the surrounding landscape character, and may be used to reduce the visual impact of the building to an acceptable level. Please also refer to our previous advice advocating the inclusion of a green wall.

Green Roof

It is pleasing to see the size of the green roof has been increased, as this will help reduce the visual impact of the building, particularly for longer distance views from the SDNP. However, this area is still a comparatively small proportion of the total roof space, and the potential to mitigate the visual impact of the building is limited. Again please refer to our previous advice that solar photovoltaic panels can be incorporated into a green roof. It is our view that the potential of the green roof to reduce visual impacts should be maximised, and a larger green roof would be a very welcome improvement to the proposal.

Car park

Although an amended planting scheme has been proposed for the car park, this is sparse, leaving large expanses of hard cover. Whilst we appreciate there is a need for sufficient parking space, we are concerned the large expanses of hard cover and glare from parked cars will have a significant visual impact on visual receptors (particularly from higher viewpoints within the SDNP). As currently proposed, the layout and planting scheme do not adequately mitigate the visual impact. There are still long, regimented rows of parking bays in the southern section of the parking area, which would highlight the rows of parked cars when viewed from higher view points within the SDNP. Notwithstanding the previous point about tree screening along the northern site boundary, staggered lines of planting in the car park may serve to break up the mass of the area, thus reducing the visual impact from longer distance viewpoints. Overall, additional planting throughout the car park would be welcomed to further break up the expanse of hard cover in this (currently) sparsely planted area. Again native species of local provenance should be used to maximise benefit for biodiversity. Another effective way to maintain the number of parking spaces whilst reducing the visual impact may be to consider the inclusion of shade screens, ideally with green roofs. These could be installed over parking bays, providing shade,

shelter and biodiversity benefits, in addition to reducing glare and significantly reducing the overall visual impact of the area from elevated viewpoints. Also, more appropriate surfacing materials should be further considered. One example may be the use of geosynthetic grass protection systems (cellular plastic paving grids for grass reinforcement). This type of surfacing could be used to create a 'greener' space, helping ease the intended transition between the commercial space and the adjacent country park, as well as reducing the expanse of hard surfacing impacting on views from the SDNP. Grass protection systems could be considered as an option in the parking bays, as these are already identified within the sustainable urban drainage strategy as areas for permeable paving.

As per our previous letter (ref: 236230, dated 09 March 2018), we still advise the application does not fully comply with the provisions of the Adur Local Plan, particularly with regards to the provision of green infrastructure and respecting the setting of the SDNP. We ask that the local authority bears this in mind in the decision-making process. The relevant policies which are applicable in this instance include the following:

- Policy 5 (New Monks Farm Site Allocation): The development of this site, the location and layout of built development, green infrastructure and other landscaping is to be based on the following principles and site-specific requirements: o Development must respect the landscape of the surrounding countryside and the South Downs National Park.
- Policy 13 (Adur's Countryside and Coast): The setting of the South Downs National Park must [also] be respected.

Impacts on Adur Estuary Site of Special Scientific Interest Saltmarsh loss

Following our previous comments on this application, clarification was sought on the total extent of area likely to be impacted by the discharge of freshwater from the pumping station into the Adur Estuary SSSI. We were concerned the area of impacted saltmarsh around the pumping station and spillway would be greater than initially described. Amended plans have been provided by the applicant in a letter (ref: TAP_NMF_apl_DF18062, dated 29 June 2018). Plans appended to the letter indicate an additional 128m² area of potentially impacted saltmarsh below the spillway, which would be subject to irrigation by surface water discharging from the pumping station (water would flow over the spillway and onto the saltmarsh below). Taking this into account, in the absence of any additional mitigation, the proposal could result in a 58m² net loss of saltmarsh habitat from the SSSI. This would be unacceptable to Natural England. A receptor ditch and balancing pond has been proposed to mitigate the effect of discharged freshwater continuing from the spillway onto the saltmarsh. We understand the receptor ditch and balancing pond would intercept the freshwater at the base of the spillway, and convey the flow of water away from areas of saltmarsh. The freshwater would theoretically enter into the receiving waters of Adur Estuary via a route of lesser environmental impact (reducing the areas of potentially impacted saltmarsh). We accept the principle of this approach as a way of reducing the area of impacted saltmarsh.

Details of the receptor ditch and balancing pond should be submitted as part of a drainage strategy, prior to any permission being given, which sets out how these features will accommodate flows from the spillway. If further examinations reveal that this feature cannot accommodate the flows from the spillway, it would need to be ensured that the calculated loss of saltmarsh at the base of the spillway can be created elsewhere within

the proposal. In this case, we would recommend that the area of saltmarsh created upstream of the pumping station is increased to accommodate the additional losses. The additional area of saltmarsh created upstream should be at least 128m² larger to ensure that there can still be a net gain of saltmarsh. These details should be included in the Mitigation Scheme, as discussed further below.

Saltmarsh Creation

Following discussion with the applicant, we are satisfied the proposed area of saltmarsh creation upstream of the pumping station can be achieved, subject to agreement with the Environment Agency (EA). We understand that the EA are generally in agreement that the saltmarsh creation can be integrated with the Tidal Walls Scheme. Nevertheless, we advise a Summary Mitigation Scheme is submitted as a condition of any planning consent for this site, which clearly states the roles and responsibilities supporting the implementation, monitoring and maintenance of mitigation (including saltmarsh creation). The scheme should detail the mitigation measures to be implemented, with clear figures/maps, responsibilities, and timings. This would include details of any shared responsibilities (i.e. with the EA), and confirmation that this has been agreed. The scheme should also include monitoring and maintenance, and details of remedial measures to be undertaken should there be any loss/damage to mitigation features. Having clear procedures in place will enable the successful implementation of the mitigation measures, and (where required) allow for any remedial actions to be undertaken effectively, thus avoiding any potential deterioration in the quality of the mitigation in the future. The suggestions submitted by the EA in their condition wording regarding habitat creation, and the 'Activity Timeline for Delivery of Adur Estuary Mitigation Scheme' submitted by the applicant, will provide a useful basis for this scheme.

Bird Disturbance

Natural England's initial advice for this proposal states that if the construction timetable can be aligned with that of the EA Tidal Walls Scheme, we do not consider the construction of the pumping station will significantly increase disturbance of birds using the SSSI. If timetables cannot be aligned, we continue to advise that construction works for the pumping station are scheduled outside the bird wintering period (November – February inclusive) to avoid impacts on SSSI birds. Should this be the case, these arrangements should be secured by way of planning condition.

We would like to reiterate that we believe it is feasible to make amendments to this scheme to address the issues set out above. We hope our comments are helpful and can be used to inform the design of robust mitigation measures appropriate to this proposal. We would be happy to provide further advice on the development of suitable mitigation measures through our Discretionary Advice Service.

Historic England – First Response

“Summary

Historic England has been involved with this proposal for pre-application advice and through the strategic allocation of the Local Plan. We think it regrettable that the historic airfield will be encroached upon by this and other potential development. This is based on

the harm this will cause to the significance of heritage assets chiefly as a result of change to their settings and the contribution that this makes to significance. We have concentrated our advice upon the designated heritage assets, namely the scheduled dome trainer and high grade listed assets in the land close to the site. The nearby conservation area is also a concern. We acknowledge that some measures are included in the application to minimise and mitigate for harm to heritage assets but we think that further actions are possible and should be considered by your Council and the applicants in order that the concerns raised in this letter might then be addressed.

Historic England Advice

Historic England has been engaged in pre-application discussions with the applicant's landscape and heritage advisers and provided initial advice on potential impacts of proposals for development at this site (our letters 13th April 2017; 16th April 2017 (ref PA00453142) and 7 August 2017 (ref PA00484410). Historic England also provided advice on the significance of this area in response to consultations about the master plan for Shoreham Airport. We expressed concerns about the proposed site for a strategic employment allocation as part of the Councils' broader regeneration policies for the area because of the potential harm that could arise to the significance of heritage assets from substantial development to support such a use.

These letters set out the significance of the heritage assets affected by the proposals that have now come forward, with the impact arising principally from development within their setting. This advice, following a further site visit to assess the impact of the submitted proposals should therefore be read in conjunction with those earlier letters.

The context of the site which is in an important strategic gap between settlements, is sensitive, both in terms of landscape (see Visual sensitivity analysis (Fig 14) by HED Landscape Architects and Urban Designers and also because it lies within the setting of several designated heritage assets. These include Lancing College (listed Grade I); Shoreham Airport Terminal Building (listed Grade II); the pedestrian timber toll bridge (listed Grade II*) and the Gunnery Training Dome (Scheduled Ancient Monument). The setting of these assets overlaps and is extensive because of the topography with the elevated site of Lancing College visible from the lower, open setting of the airfield which is also an important element in its aesthetic significance. There are also unlisted heritage assets within the site comprising two WWII pillboxes, Daniel's Barn and a Blister Hangar. The application site also medieval saltern mounds and associated remains indicative of early- and late-medieval salt making industry.*

Historic England will focus on the effect of the development on designated heritage assets. Your Council's Conservation Officer and the County Council's archaeological advisors will be your principal sources of advice about grade II listed buildings and undesignated archaeological remains.

Significance of the airfield

The heritage significance of Shoreham airfield and the dome trainer is set out in a Heritage Statement by ACTA Landscape and Heritage Consultants (2016) and the Desk Based Assessment by PCA Heritage Ltd (2017). Shoreham was one of the centres of early British aviation and is the only one which is still active as an aviation centre. It is Britain's oldest licensed airport and was also used as a military airfield in both World Wars;

flying began in 1910 and Brighton (Shoreham) Airport was opened in 1911. It became a centre for civilian flying training and was used by notable pioneer aviators, such as Harold Piffar who flew his experimental Hummingbird biplane there in 1910. The airfield was adapted for military aviation during World War One during which time it was used by the Royal Flying Corps 3rd Reserve Squadron. In 1918 it was used for testing captured German aircraft.

The growth of Britain's civil air transport services during the 1930's led to a flurry of new local and regional airports being established. In 1936 Shoreham was redesigned and named Brighton Hove and Worthing Municipal Airport. The terminal building and hangar of the time represent a significant survival from this important period in the development of civil aviation.

From May 1940 Shoreham was used by 225 Squadron for anti-invasion patrols. During the Battle of Britain Shoreham became an emergency landing ground for damaged aircraft but for a short time was also home to the Fighter Interception Unit (from Tangmere) and 422 Special Hurricane flight - later to become 96 Fighter Squadron. Later in 1941 it housed 277 Air Sea Rescue Squadron. Operation Jubilee (the raid on Dieppe in 1942) was planned in Shoreham's terminal building, and in the preparation for the Normandy landings in 1944 the airfield was host to a newly formed French Fighter squadron. Blister aircraft hangars and temporary accommodation for personnel were constructed to supplement the existing civilian facilities. In the post-War period there were some doubts as to the future role of the airfield but in 1971 it became a civil airport known as Brighton Hove and Worthing Joint Municipal Airport (Shoreham).

Significance of the dome trainer

The dome gunnery trainer was built during the Second World War for training ground gunners in airfield defence. It is a hemispherical building, 12m in diameter, with an entrance on the north side. It was constructed of concrete and metal mesh covered with gritted tar. The interior of the dome originally portrayed the night sky onto which were projected films of moving aircraft. These were "fired" at by trainees using a facsimile anti-aircraft gun or "dummy gun". There are now few surviving examples although one of similar design, also a scheduled monument, was restored at Langham Airfield, Norfolk. As a significant testament to the development of military training and as an example of enterprise and intuition in airfield defence, at a time when Britain faced one of the greatest airborne threats of the twentieth century, it is of national importance. The gunnery training dome was not part of a fully planned military airfield but a piecemeal addition to a temporary wartime airfield, however, we think that the air-attack and anti-invasion defence zones of the airfield was chosen in preference to other non-military sites, and therefore that the airfield setting of the dome trainer does contribute somewhat to its heritage significance, although it was secondary and peripheral to the main business of the airfield.

Harm to the significance of the airfield and the dome trainer

The highway works will introduce new traffic to the vicinity of the dome trainer, particularly to its south and east; the proposed road is only 25 metres from it. We think that the roads are likely to be harmful to the heritage significance of the dome trainer by isolating it from the rest of the airfield, thereby divorcing it from its historic setting and increasing visual and audible disturbance. Undesignated components of the airfield that were contemporary with the dome trainer (the airfield road and the blister hangar) will be demolished.

The adverse effects of the proposed link road on the setting of the dome trainer will be offset to a degree by other improvements to its setting and accessibility. In particular, removal of the earthworks associated with a helipad (that altered ground levels and caused flooding of the dome), clearance of vegetation, provision of interpretative information and inclusion on the new country park heritage trail. We welcome the New Monks Farm Development Ltd's commitment to prepare a Conservation Management Plan for the monument in consultation with Historic England, West Sussex County Council and Adur District Council and to prepare and install external information panels.

There is the potential for the proposed IKEA retail building and traveller's site to intrude into views from the dome trainer, however we think it likely that existing and proposed landscaping and vegetation in the intervening area will effectively screen the development in views westward from the dome trainer. It is unfortunate that the blister hangar and the airfield road, which are part of the historic airfield would be demolished. It would be preferable to retain them and identify a new use for the building.

We note that an archaeological mitigation strategy will be developed in collaboration with West Sussex County Council's Environment & Heritage Team to ensure that harm to buried archaeological remains and historic buildings is mitigated by archaeological works and architectural recording.

Harm to significance of heritage assets in the wider landscape.

Historic England regret that the important gap between historic settlements which is the setting to Old Shoreham Conservation area and also makes a contribution to the setting and significance of Lancing College and the Airport Terminal buildings, is being encroached upon by this proposed new development. Whilst we acknowledge that development is largely concentrated in the lower quality landscape areas and that measures have been taken to mitigate its visual impact, nevertheless it is an unwelcome precedent.

There is harm caused to the setting of both Lancing College and also the Airport Terminal building which arises principally from the proposed non-food retail (IKEA) proposal and the access proposals from the A27 leading to the store and the proposed pumping station to the east. This harm is the result of what will be a very noticeable change in character to part of the setting of these assets caused by a large building of commercial character that will be very visible in important views from the airfield looking north. The open topography and relationship of the airfield to its setting is best appreciated from outside the terminal building and contributes to its significance because it allows an understanding of the approach to the airfield between the South Downs. It is also from this location that some of the best panoramic views are obtained of Lancing College which visually dominates from its elevated position. The introduction of a building of the scale, height and appearance required by IKEA will therefore be a noticeable visual distraction to an otherwise largely green and open setting.

We acknowledge that in the immediate vicinity of the site the proposed strengthening of landscape buffers and a considered approach to lighting will mean that the activity associated with the building will not be readily appreciated from this distance and that, over time, as the landscaping matures the visual impact at low level will be further

mitigated. However, this will not address the visual impact at landscape level identified above and we therefore advise that further minimisation should be considered. A successful approach adopted elsewhere is breaking down scale through colour and we recommend that as a minimum, a less assertive tone of blue should be adopted at the upper level of the building; however, a more neutral grey or green based colour is likely to be even more successful. There should also be no signage at high level and lighting should also be avoided, apart from that required for access to the proposed roof plant which should be controlled so as to be only used when necessary.

The pumping station will effectively sever the visual connection between the Old Shoreham Bridge and the airfield and will represent a significant change to the character of the river bank immediately opposite the historic settlement which can be appreciated from the bridge. If it is demonstrated that the harm to the setting of the bridge and the conservation area arising from this impact cannot be avoided, by moving this infrastructure to a less sensitive location for example, then an approach which integrates the complex with its landscape offers the best chance of minimising the harm. This integration should include “softening” the form of the buildings, employing green roofs and taking every opportunity with landscape modelling, particularly on the eastern side of the complex, within the constraints arising from the existing estuarine character of the context and its associated importance for biodiversity.

Recommendation

Under the NPPF it is a core planning principle to conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations (para.17 NPPF). When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. No other planning concern is given a greater sense of importance in the NPPF. The more important the asset, the greater the weight should be.

The planning system should play an active role in guiding development to sustainable solutions (para.8, NPPF). Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment (para.9 NPPF). Your authority should therefore also seek to improve proposals so that they avoid or minimise harm to the significance of designated heritage assets, whether through changes to the asset or to its setting. In determining planning applications, local planning authorities should take account of:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- the desirability of new development making a positive contribution to local character and distinctiveness (para.131, NPPF).

Significance can be harmed or lost through alteration or destruction of a heritage asset or development within its setting. As heritage assets are irreplaceable harm should be avoided wherever possible. Any harm or loss should require clear and convincing justification (para.132 NPPF) so an application should demonstrate that all less harmful

alternatives have been considered. If a proposal cannot be amended to avoid all harm, and the harm is less than substantial, it can be weighed against the public benefits of the proposal (para.134, NPPF).

Recommendation for the dome trainer, airfield & archaeology

The dome trainer is of national heritage significance and it should be preserved, as should its setting where this contributes to significance (NPPF, paragraphs 17 & 132). The development would be harmful to the heritage significance of the scheduled dome trainer, other aspects of the heritage significance of the airfield, and to archaeological remains to the west of the airfield. The harm to the scheduled dome trainer would be less than substantial. The harm to the undesignated airfield road and blister hangar would be substantial. Harm to buried archaeological remains could be substantial.

The applicant has addressed alternative designs and sought to avoid harm to the significance of designated heritage assets through design and provided justification for the remaining harm, as is required by paragraph 132 of the NPPF. We agree that the proposed screening of the development from the dome trainer has lessened the potential harm. Furthermore, the proposals to improve its setting, make it publically accessible within a country park, and provide for its future management seem likely to better reveal its significance and to make its management more sustainable. However, we think that given the great significance of the dome trainer some additional provision should be made for some initial repair work to make it safe and accessible for occasional access by visitors. These provisions could be secured by a condition of planning permission that requires a specification of the works to be approved by your Council.

Furthermore, we think that in addition to the inclusion of the dome trainer within a conservation management plan in association with partners and to be approved by your Council, the objectives of the Country Park management company should include the conservation and sustainable management of the dome trainer alongside its other objectives so that it becomes a proactively managed asset of the country park. The proposed Section 106 agreement could be the means by which this future management provision is secured (NPPF, para.131).

We note that there would be difficulties in preserving and re-using the blister hangar but given the substantial harm to this undesignated heritage asset we recommend that you should satisfy yourselves that its demolition is justified (NPPF para. 135).

Recommendation for designated assets in the wider landscape

The references to the advice of the NPPF given above are also applicable to these issues but in addition when determining this application, the decision maker has to comply with the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. This requires you to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess. A decision maker also has to comply with section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 which requires you to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

We consider that the issues and safeguards outlined in our advice above need to be

addressed in order for the application to meet the requirements of paragraphs 126; 129; 131 and 132 of the NPPF. The harm arising from these proposals is less than substantial in the terms of the NPPF (paragraph 134) but great weight has to be given to the conservation of heritage assets and the more important the assets (as here) then the greater the weight should be. The harm identified can be further minimised which is the required approach under paragraph 129 of the NPPF. We would be pleased to comment further on any amendments that you may now seek based on this recommendation.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.”

Historic England – Second Response

“Historic England Advice

Historic England advice on this application has concentrated upon the visual impact of the proposed commercial buildings (the IKEA store) and the harm it causes to the contribution made by the setting to the designated heritage assets adjacent to the site. These include Shoreham Airport, an open landscape that contributes to the historic and architectural interest of the listed terminal buildings and Lancing College whose architectural interest is enhanced by its prominence in the wider landscape.

The additional information and amendments do not address this harm which, in accordance with the NPPF should be avoided or minimised.

Recommendation

Historic England has concerns regarding the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed to comply with the requirements of paragraph 129 of the NPPF.

In determining this application, you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.”

Historic England – Final response awaited

Lancing Parish Council objects to the application and comments that,
“The Parish Council considered the amended plans etc., at its meeting on 7 March 2018 and it was agreed that the amended plans and further information to the Environment Statement do not sufficiently address the concerns of the Parish Council and the Parish Council continues to object to the proposed development on New Monks Farm on the grounds of –

- 1) Severe Flood risk to third parties residing around the Lancing Brooks Flood Plain.*

- 2) *Withy Patch residents are under threat of unsuitable relocation; the Parish Council calls upon West Sussex County Council to reinstate their home and leave the residents in situ.*
- 3) *A sewerage system that will overwhelm the existing sewage system due to the impact of 600 houses and IKEA and the Football Academy discharging into an antiquated broken sewage system creating floods and pollution to surrounding areas.*
- 4) *The surface water drainage system of Archimedes screws into the River Adur is experimental and unproven, the risks of failure would be catastrophic.*
- 5) *Groundwater flows are, by and large, ignored on an area that has a 75% risk of groundwater flooding across the entire flood plain. Groundwater cannot be pumped.*
- 6) *The A27 and the A259 are already inadequate and severely congested, the impact of 2 million visits a year visiting IKEA and the impact of 600+ cars from the development will create gridlock to Lancing and Shoreham.*
- 7) *Air pollution is currently over the statutory limits and would increase dramatically posing severe health risks to residents, children and families.*
- 8) *New Monks Farm developers have offered a comparison as Cardiff IKEA to promote the proposed NMF IKEA. The Parish Council has found this to be a totally incomparable and incorrect, a misleading attempt at convincing Lancing residents of the impact on Lancing traffic flows relating to IKEA.*
- 9) *In terms of affordable homes, which there are not, there will be no benefit to Lancing residents in need i.e. Homeless, disabled.*
- 10) *The remainder of the proposed houses, some on private roads and adopted roads, will be beyond the reach of Lancing young families, due to the high costs of purchase and ground maintenance costs.*
- 11) *The insertion of 2 more football pitches will have a negative impact on the environment destroying ecology and wildlife and pose further flood risk to the surrounding areas.*
- 12) *The Airport remains under threat, this is unacceptable and the Parish Council query's how and why this has been allowed to deteriorate to this position, the proposed development of 25,000 sq metres on flood plain further increase flood risk.*
- 13) *The infrastructure proposals i.e. school, GP surgery etc are woefully inadequate and unacceptable, Adur is already over capacity and overstretched in terms of schooling and healthcare, the additional pressure on statutory provision is unacceptable also given the 100s of houses currently being constructed and proposed in Shoreham.*
- 14) *The proposed area of development will have a dramatic detrimental effect on the existing ecology conservation and preservation of the existing wildlife inhabiting and visiting this strategic area.*
- 15) *The proposed development will have a profound negative, irreparable impact on Lancing village and residents for the foreseeable future."*

Brighton City Airport – Airport Consultative Committee

"On behalf of Shoreham (Brighton City Airport) Consultative Committee, I confirm our support for the development commonly known as New Monks Farm. This was agreed in our meeting on 18th October 2017, minutes of which are in the public domain via the Airport website."

Conservation Area Advisory Group

"ADCAG Minutes which please record as a 'holding objection' to AWDM/0961/17 – Land West of New Monks Farm, Mash barn Lane, Lancing, West Sussex"

The Shoreham Beach Residents' Association (SBRA) objects to the application on the grounds that,

- *"The A27 and A259 are already woefully inadequate and cannot cope with traffic during peak times. Both arterial routes are often gridlocked. The impact of an IKEA store and 600 new homes will create traffic chaos and bring already over-burdened roads to a standstill. The proposed road improvements are inadequate and not fit for purpose.*
- *There is a lot of talk about investment in cycle lanes and enhanced bus services; IKEA customers are unlikely to travel to buy furniture by bike or bus.*
- *IKEA's traffic projections are flawed. They have under-estimated the amount of extra traffic generated from the West, By their own admission, Arundel is not the half way point between Lancing and the Southampton store yet that was the basis of projections.*
- *Air pollution already exceeds statutory limits at key points on both roads. This can only get worse.*
- *There has been no satisfactory traffic assessment of IKEA's impact on the A259 between Lancing and the Ropetackle roundabout in Shoreham (including The Saltings roundabout which is the only road access point to Shoreham Beach).*
- *Developing the flood plain will create a dangerous precedent - possibly opening up opportunities for the development of New Salts Farm (with devastating traffic implications for Shoreham Beach). This site is not in the Local Plan.*
- *The infrastructure improvements are inadequate - eg there is a primary school but no enhanced secondary school provision. How will NHS services cope with this and the many hundreds of new homes proposed across the Adur district? The sewage and drainage systems will struggle to cope.*
- *Many local people are worried by the impact on the airport; the development is under the flight path from grass runways used when the wind is in the direction of the proposed new homes.*
- *The flood risk is substantial to residents already living around the Lancing Brooks Flood Plain."*

The Shoreham Society states that,

"On behalf of our 500+ members and many other residents of Adur who have expressed their concerns to us, we wish to object to the part of this application which proposes a non-food retail store. We know that the store in mind is IKEA, and we feel that this makes the application unacceptable due to the inevitable and huge additional strain which this would put on the already over-stretched road system, drawing traffic from all over Sussex and beyond both in terms of the A27 and also the A259 including Shoreham High Street, which we know suffer knock-on effects from the A27. Even before such a store would be built, these roads will be experiencing even more difficulties than at present from developments currently in the pipeline, and others approved in principle in the emerging Local Plan, which will inevitably bringing more gridlock and air pollution to the town than we are currently experiencing. We believe that a better solution for that part of the proposed site would be an application for a complex comprising smaller businesses of

high quality employment, which are sorely needed in the area not unskilled retail staffing such as required by IKEA.

2nd response - *'We consider that this site, in a residential area, is completely inappropriate for an IKEA store. On the A27, a road that is already very heavily congested for much of each day, and with serious air pollution, we consider that such a store would add unacceptable levels of additional traffic, which would push traffic onto the A259 and Shoreham High Street, which is already gridlocked several times each day, and is set to have increased traffic in the near future due to building developments which have already received planning approval.'*

The Southwick Sussex Society objects to the application,
"On behalf of the Southwick (Sussex) Society, I wish to point out that although the Society is in favour of increasing the availability of housing in the area, we are concerned that an IKEA store of the size proposed would greatly increase the traffic on the A27 road. This road is already heavily congested and this proposal could only cause additional problems."

6. Representations

Objecting to the Application

As of the 10th July 2018 there were **1,355** objections to the development.

Petitions

A petition signed by 944 people has been submitted although there is no indication of what basis the petition was raised other than the covering letter refers to opposition to the New Monks Farm Development.

Various other petitions have been signed by 324 people objecting to the application on the grounds that:

- 1) Lack of attention to traffic congestion on roads already full to capacity and gridlocked during busy times of the day.
- 2) High pollution created by traffic in an already overcrowded and in a high polluted environment.
- 3) IKEA are likely to have up to 2 million traffic movements per year.
- 4) For each house built there could be the addition on average of 2 cars per household.
- 5) A major concern is the lack of low cost affordable homes.
- 6) With 600 new houses being built, the current infrastructure will be unable to cope so schools, doctors surgeries, hospitals, dentists, libraries and the Police will be overwhelmed.
- 7) There will be a massive increase to the risk of flooding due to building on an essential flood plain which will have serious implications for the surrounding area.

Petition: 95 Signatures

Petition for the need for a direct route for residents cars from the new houses to be built at New Monks Farm to shops, businesses, Doctors' Surgeries and the railway station in central Lancing has been signed by the businesses in North Road, South Street and Crabtree Lane.

Residents have also submitted the following standard letters of objection as set out below:

Letter 1 (submitted by 415 residents)

"I write with reference to the above application, for 600 houses and an IKEA store, which should be rejected in its entirety. Reasons for the rejection are as follows:

*First and foremost, the land is a **floodplain**.*

***IKEA are proposing a store of 32,900sqm.** The store projects 2 million visits per year. The existing road infrastructure cannot cope at present, let alone another **38,461** car users visiting IKEA **each week**.*

The normal requirements of a community are lacking at present, but the influx of residents from the 600 proposed new houses would saturate the existing schools, doctor surgeries, hospitals, dentists, care homes and social services etc.

The roads are overloaded at present and the idea of using Mash Barn Estate as a thoroughfare is unfair to the residents. This will endanger their health, wellbeing and lives. Think of Grinstead Lane during the rush hour at present!!

The first school is planned with playing fields backing onto the A27. The A27 already exceeds air quality pollution legal requirements. Not the best environment for children to be playing in!

I understand that my name and address will be shown on the Council's planning website in order to register my objection.

I trust the above will be taken into account when this planning application is discussed."

Letter 2 (submitted by 146 residents)

"I am writing with reference to the above application which should be rejected for the following reasons:

***1. Increased congestion** on the A27 which already has 60,000 car journeys a day and long, frequent tailbacks. IKEA will attract an extra 5,400 car journeys each day. This development would also affect the A259 Shoreham High St. which is already congested with 15,500 vehicles each day between 7am and 7pm. Increased congestion will affect businesses in the area and increase congestion to 7 days a week rather than just 5.*

2. Increased air pollution on the A27 where Nitrogen Dioxide readings taken by AREA, Adur Residents Environmental Action were found to be considerably over the legal limit of 40 micrograms per cubic metre with some over 50. Shoreham High St has been an Air quality Management Area for many years with readings in the 40's and 50's.

Particulate matter has not been measured on either the A27 or Shoreham High St. Particulates are carcinogens penetrating deep into the lungs and affecting the respiratory system. The health of people using these roads could be seriously affected.

3. Building on a flood plain will affect not just the new homes but the homes and sewage systems of the existing residents.

4. The infrastructure of Adur is already stretched. Schools are full, doctors' surgeries have long waiting times for appointments, hospitals and care facilities are pushed to their limit. A new one form entry primary school would not be financially viable and would not be built in time for the children of phase one of the development who would have to start school elsewhere. To even consider building a school with playing fields backing onto the A27 is irresponsible.

5. Concerns for Brighton and Hove Airport (Shoreham Airport) where a loss of drop down space for the helicopters could put some companies out of business. IKEA will mainly create low skilled jobs.

I trust that my views will be taken into account when the planning application is discussed."

Letter 3 (submitted by 29 residents)

"I write to object strenuously to the above proposed application at New Monks Farm.

It is quite unbelievable that despite all the concerns the community has raised over the last 4 years against this site being put into the local plan, the community's comments have simply been totally ignored. So much for localism.

*The need for housing is absolutely understood. **However, this site could not be more inappropriate for the proposed 600 homes, a flag ship IKEA, a school and a relocated travellers site.***

The infrastructure simply will not accommodate it.

These are the reasons I object.

- 1. Building on a flood plain which has flooded historically with all the implications for increasing flood risk to the areas around is absolutely irresponsible. In periods of extreme wet weather, the Lancing community will be the victims of even greater drainage issues than those experienced in 4 out of the previous 5 winters with flooded properties, local roads and inundated sewers with surcharged manholes.*

2. *Adding the equivalent foul waste output of another council ward onto the currently creaking local sewer network without fully upgrading the sewers to accommodate this effluent will mean increased problems for not only the current residents, but if they are built, also the 600 homes and the other properties on that development site. A new home - but you dare not flush the toilet! - and are unable to get it insured against flood risk either! Where on earth is the common-sense thinking??!!*
3. *Adding at least another estimated 8,000 vehicle movements a day to the A27 which is already at overcapacity and which even Highways England is having considerable problems in remedying, will not be adding congestion to this already congested road the public, **so we are led to believe by the developer!!***

Highways England have still not put forward a plan to solve this and other sectors of the A27. So the developer with all this additional traffic and that 'magic' roundabout is not going to make the problems worse? The Lancing stretch of the A27 is estimated to expect at least a 13% increase in traffic movements alone from this major development and the airport development! Where on earth is the common-sense thinking??!!

4. **Increased** *traffic with even greater congestion, particularly during the times of rush hours will create even higher levels of air pollution which residents know from their own monitoring are already above legal limits, particularly on the sector from Sussex Pad to the proposed new roundabout and further west on the eastern and western approaches to the next two intersections. The inevitable outcome - increased risks of severe health problems from air pollution for the local community and users of this already failing major road.*
5. *A population increase of 1440 residents (probably underestimated!) will have to be treated by an already overwhelmed NHS and the local doctors' surgeries. But the latter are already oversubscribed and those surgeries who are trying to recruit new doctors to cope are not able to find any candidates! Another worsening of infrastructure by this proposal.*

This is a highly complex site to develop and even the official consultees are finding it hard to obtain the evidence to prove its sustainability in all the above matters.

For duty of care to the local ratepayers and the future of our district and its residents, I strenuously ask, no demand, that Adur District Council categorically refuses planning permission for this totally unacceptable planning application."

Letter 4 (submitted by 21 residents)

"I write with reference to the above application, for 600 houses and an IKEA store, which should be rejected in its entirety. Reasons for the rejection are as follows:

IKEA are proposing a store of 32,900sqm. The store projects 2 million visits per year. The existing road infrastructure cannot cope at present, let alone another 38,461 car users visiting IKEA each week.

As I work on the site of the Shoreham Airport together with 700 other employees, the inevitable delays from the proposed light controlled roundabout and onsite roundabouts with the substantial uplift in traffic levels will impact on myself and colleagues to travel in a timely fashion to our place of work and similarly to return home. Traffic gridlock is a problem now without any additional traffic flows and journey times are constantly increasing.

In rush hours Grinstead Lane is overloaded at present. The idea of using Mash Barn Estate as a thoroughfare is not only unfair to residents of that estate but will endanger their health, wellbeing and quality of life. My particular concern - it will impact even further on journey times for our staff members whose route to and from work includes Grinstead Lane.

New Monks Farm is on a flood plain and this large development will only create additional drainage and sewage problems for the whole of the Lancing area, even with further delays on the A27 where carriageway flooding frequently occurs in extreme wet weather.

The proposed first years school is planned with playing fields backing onto the A27. The A27 already exceeds air quality pollution legal requirements. Not the best environment for children to be playing in!

My other observations, in the district, the normal local requirements of a community are lacking at present. The influx of residents from the 600 proposed new houses would saturate the existing schools, doctor surgeries, hospitals, dentists, care homes and social services etc.

The New Monks Farm development is totally unsustainable on all fronts and should be refused.

I understand that my name and address will be shown on the Council's planning website in order to register my objection.

I trust the above will be taken into account when this planning application is discussed.'

A petition signed by 15 residents has objected to the application on the grounds that,

'We object to the proposed closure of the crossing over the A27 at the Sussex Pad Junction from the Old Shoreham Road to Coombes Road for cyclists and other non car users. If the existing crossing is removed, it must be replaced by a bridge or underpass providing a safe direct crossing over the A27 from the Old Shoreham Road to Coombes Road for cyclists and others.'

A note from VC Jubilee Youth Cycling Club, supporting the objection, comments that,

'The kids in our Club regularly use this crossing when accessing the bridleways and quiet lanes that surround Coombes LA. The A27 is one of the busiest roads in the south. If the existing crossing is removed, access to these areas will be restricted and we may be forced to try to negotiate this very busy section of road.'

VC Jubilee is one of the southern regions most successful youth cycling clubs. It having introduced many riders to the sport, some having achieved European and Olympic success. VC Jubilee is based in Shoreham-by-Sea supported by Worthing Council."

Standard Objection Letter signed by 80 residents

Summary:

- Object to the lengthy, inadequate and hazardous replacement for the existing crossing from the Old Shoreham Road to Coombes Road for cyclists and other non-motorised users
- If existing crossing is removed, must be replaced by a bridge or underpass which gives safe, direct access across the A27 from the Old Shoreham Road to Coombes Road for all non-motorised users and it must be useable in all weathers and at all times of day
- The proposed replacement crossing does not fulfil high quality standards in walking and cycling
- Disagree with paragraph 4.3.19 of the Transport Assessment
- Development needs to provide more safe, direct and attractive walking and cycling routes and links so that people can walk /cycle easily to key destinations
- West Sussex Walking and Cycling Strategy
- Statements in the Technical Note: A27 Access Strategy section of the Transport Assessment demonstrate ignorance of the need to develop high quality walking and cycling facilities

Standard Objection Letter signed by 107 residents

Summary:

- Traffic
- Pollution
- Flooding
- Pathways - removal of Sussex Pad
- Infrastructure
- Adur Council has a duty of care to the community

Standard Objection Letter signed by 68 residents

Summary:

- Object to the proposed closure of the crossing over the A27 at the Sussex Pad junction from the Old Shoreham Road to Coombes Road for cyclists and other non-car users
- Children use this crossing
- If the existing crossing is removed, it must be replaced by a bridge or underpass providing a safe, direct crossing over the A2 from the Old Shoreham Road to Coombes Road for cyclists and others

Individual Comments

The Local MP, Tim Loughton, objects to the application on the grounds that,

"I have consistently said that I think these plans represent a massive overdevelopment of the area which will be detrimental to local residents, my constituents. My main areas of objection are as follows.

Notwithstanding the need nationally to build more homes whilst some degree of housebuilding is possible and indeed desirable on this site 600 units is too high a number. There is an insufficient allocation of genuinely 'affordable' housing especially affordable to rent. The sewage system in Lancing is already under huge pressure and subject to regular breakdowns including numerous instances of raw sewage polluting local roads and gardens over recent years. The arrangements to link into the existing drainage network appear wholly inadequate.

The area is a flood plain with a minimal fall for surface water to drain away which will only be made worse by concreting over a large part of land where water can currently soak away. Again a great number of residents especially around Manor Way/Manor Close have been subject to serious flooding in recent years. The developers have yet to demonstrate that the pumping solution they are putting forward deal with the existing problem let alone the flood threat to new build.

The new school proposed is right on a highly polluted stretch of the A27 which is surely a completely inappropriate place to site a school with young pupils. Recent testing by the local environment group AREA have confirmed that in certain spots air quality levels are already above Government safety thresholds.

For the development to be acceptable to local people it needs to be able to demonstrate a net benefit to existing residents. Whilst there would be some temporary additional employment opportunities during the construction phase and a limited area of park space would be given over to local residents' use the 'payback' to the local community would be limited. The major increase in jobs promised by the IKEA development would be predominantly low skilled jobs and unemployment levels in the area are sufficiently low that inevitably staff would have to be brought in from outside the district adding to traffic pressures.

Overall the inclusion of IKEA is the most negative part of the plans threatening its overall sustainability. Of all large retail outlets the nature of IKEA requires more customers travelling by car than just about any other retailer meaning huge pressure of the A27. A figure of 2 million customer journeys a year has been mentioned although only comparisons with the Cardiff branch of IKEA have been provided despite this being in a very different location to Lancing. The intention is to open IKEA by 2019 several years before any upgrade work to the A27 is likely to have been started and that work is currently not agreed or designed and its effectiveness therefore completely unknown. The already congested A27 will therefore be required to take on additional IKEA customers, homeowners accessing their homes, school run car journeys and other users of the park and community hub which may include a GP surgery.

Access for all this traffic, as well as accessing the Airport and Ricardo from the north will be via a single road facilitated by a single roundabout with traffic lights — clearly a 'magic roundabout.' In addition the users of Coombes Road, including the many cars accessing Lancing College, a major employer in the area occupying a space much larger than New Monks Farm, will now have to take a long detour to gain access. The excuse that IKEA does not open until 10am after peak time ignores the fact that congestion happens intermittently throughout each day now and the store will remain open until 10pm and all weekends.

This is a recipe for complete gridlock on the A27 and it is madness that any substantial development should go ahead adjacent to this road until and unless substantial and workable improvements have gone ahead. This is a case of absolutely 'putting the cart before the horse.'

I do not believe that other alternatives to IKEA could not be found to occupy that space which would not involve so many customer journeys by car. For example Adur has a severe shortage of business space and many businesses keen to expand and stay in the area. Lancing Business Park is the second largest business park in West Sussex, employs some 3200 people and is currently about 99% occupied. There are many new and expanding businesses who would be attracted to a new high-tech business park on the New Monks Farm site say, involving many more higher skilled jobs which is what the Government, Councils, LEP and local businesses working closely with schools are all trying to achieve. Taking this site out of circulation for such use reduces the possibilities for attracting more premium businesses to the area and indeed the added traffic congestion is likely to act as a further deterrent to existing ones expanding or staying in the area.

Overall therefore I think these plans are excessive and unsustainable and if passed in anything like their current form would seriously undermine the living conditions for a great many of my constituents, visitors to and investors in the area."

The MP also states that a survey distributed across Lancing has already had 700 responses with 80% opposing the development.

Summary of individual public objections by topic area

No. of objections: 162 relating to Objections in relation to Coombes Road / Removal of Sussex Pad Crossing

- Recent amended plans do not address original objections
- West Sussex County Council Highways fail to recognise the absence of national design standards
- Object to the removal of the A27 crossing from Shoreham Airport to Coombes Road
- This crossing is used significantly by cyclists and pedestrians and is considered invaluable for cyclists, cycling events, cycling groups and youth cycling clubs
- Crossing is used for people accessing Lancing College. The college is a place of employment for many local people with employees walking / cycling from Shoreham
- This is an essential access route to link to the South Downs National Park

- For road cyclists, this crossing is the only access to the route from Shoreham to Steyning via Coombes Road
- Disagree with paragraph 4.3.19 of the Transport Assessment stating very low cycling demands for crossing the A27
- Shared use footpath is inappropriate and there is no separation of lanes for walkers and pedestrians can safely and separately traverse the A27
- The Government seeks to encourage cycling and walking to be the natural choice for local journeys or part of a longer journey. Removing this crossing is therefore contradictory with the aim of promoting opportunities for walking and cycling and it is a backward step
- Goes against the objectives contained within West Sussex County Council - West Sussex Walking and Cycling Strategy 2016 - 2026
- Need more choices of cycle routes and pedestrian routes to help ease traffic congestion
- Sustainable transport modes needs to be better prioritised
- We have a responsibility to reduce car use for public health and climate change
- The proposals will result in a detour that is lengthy and complicated
- The proposed alternative option is not safe and will be dangerous and hazardous for cyclists to navigate and would deter young people, families and those less confident from cycling. Lack of consideration for health and safety
- Need to provide a safe and suitable alternative route to enable cyclist to access Coombes from Shoreham. Alternative options could include a bridge crossing or an underpass providing a direct crossing over the A27 for all non-motorised road users and it must be usable in all weathers and at all times of the day i.e. sufficient lighting and not vulnerable to flooding
- Should provide Dutch style cycleways across the development
- Traffic congestion will be further exacerbated as the proposal will encourage car use

No. of objections: 421 relating to Highways Access & Parking

- The amended plans do not address issues of traffic congestion and pollution
- The area already suffers from significant traffic congestion and the proposal will exacerbate traffic congestion even more
- The transport infrastructure does not have the capacity to accommodate the increase in population and the estimated 5,000 daily customer visits to IKEA
- There are no motorways nearby. Inadequate research has been done as to the long term effects of a development of this size. The increase in noise and disturbance to current traffic levels will be substantial. Without the upgrade in the A27, the severity on other businesses and residential traffic will make the area untenable and will have a detrimental effect on the local economy
- There must be an alternative major route access / egress. It is considered that the only feasible solution is a bridge over or under the railway line to a spur connecting to the Saltings roundabout
- New Salts Farm Road would be used as a shortcut for traffic from the A27 to the A259 and vice versa
- The proposals fail to correctly address the removal of a safe, direct crossing of the A27 for non-motorised vulnerable road users
- Whatever alternative crossing of the A27 for non-motorised users is provided, this must be in place prior to the removal of the Sussex Pad traffic lights

- Development offers the best possible opportunity for the delivery of a grade separated non-motorised user crossing of the A27. Consideration should be given to the provision of a bridge between Old Shoreham Road and Coombes Road to provide the most direct and convenient crossing that all non-motorised users are looking for
- The proposals fail to grasp the opportunity to fulfil West Sussex County Council policy requirements to prioritise non-motorised travel
- The Government seeks the transition towards sustainable modes of transport in respect of climate change, air quality and the associated public health benefits with walking and cycling. This proposal is therefore a backward step and does not support Government policies
- Need to provide new walking and cycling routes to enable access to all key destinations and should be integrated with existing infrastructure
- Speed limit should be 20mph in residential areas
- The proposed temporary access via Grinstead Lane should be permanent
- Object to the temporary access via Grinstead Lane - will result in traffic congestion
- Providing roundabout access to the development should include a flyover so that the A27 traffic is not slowed down by this access junction
- Recent aviation incident on the A27. The site is an inappropriate location for residential development given the potential noise impact and safety risk associated with the airfield nearby. Would planning permission for a new runway be granted if it were only 265 metres from houses?
- The increase in traffic congestion will increase noise and air pollution
- The submitted noise report does not assess noise generated from helicopters
- Lack of pedestrian and cycling facilities. The development should strive to be an example of excellence in provision of alternate transport
- The amended provision of upgrading the River Adur footpath is still not adequate. Some sections is 2.5 metres wide. Sustrans recommend a minimum width of 3 metres. Should the path be used as a bridleway, 5 metres is recommended. No reference is made to drainage. Footpath is often liable to flooding. No reference is made to crash barriers to protect footpath users from traffic along the A27. British Horse Society request that the bridleway has a useable width of 4m with a minimum height requirement of 3.4m
- The application needs to meet the County Council's Rights of Way standards
- Object to the wording in paragraph 2.11 - "A Section 25 application to formally upgrade the footpath to a bridleway will be made at the appropriate stage." When exactly do the developers consider is "the appropriate stage"?
- There is discrepancy between the legal status of the Public Right of Way 2049 path described in the 'Summary of Additional Information' and the Drawing referred to in the summary (VD14260_SK_0101C)
- Adur Toll Bridge should remain untouched

Air Quality

- Levels of Nitrous Oxide are already higher than acceptable and this issue needs to be addressed as part of the development
- Any statutory testing must be carried out and necessary action must be taken before the development is put into place
- The proposed school is proposed to be sited within an area of high levels of Nitrous Oxide

- The measures proposed to reduce air pollution (Adur Air Quality Management Plan) are soft measures. No evidence of funding to implement any Low Emission Zones.
- Should defer any planning permission until at least an updated and credible Air Quality Management Plan is in place

Overdevelopment

- The development is of a significant scale that will overwhelm the infrastructure and will spoil the character of the local area

Design

- Visual impact of IKEA upon the local environment and the South Downs National Park. The impact could be reduced by painting it green with a green roof.
- An eco-friendly green roof on IKEA will not replace the wildlife habitat lost. Most threatened ground nesting birds such as Skylarks and Lapwing will find a planted roof too exposed
- Visual impact of IKEA will dominate the views from a number of sensitive locations including Lancing College and its heritage asset
- Height and scale of the IKEA building is too large and out of scale to the surrounding area. It will overshadow neighbouring properties and needs to be scaled down in a similar fashion to the Ricardo development. The proposed building design is of a poor quality with no enhancement to form part of the area. The location of the IKEA building is poor and positioned in the wrong location. The similar sized poor quality warehouse football training ground buildings are located to the railway side of the airport and the building should be re-positioned accordingly.

Environment

- The amended plans do little, if anything to mitigate the environmental impact of this over development
- The site is a greenfield site. There are brownfield sites in the area that could be utilised first such as Shoreham Cement works
- Significant impact on the landscape
- Much of the emphasis on the landscape mitigation is on the future growth of screening street and hedgerow trees. Would question the choice of species on document HED-1172-LA-904_Tree Planting Schedule, both for their appropriateness to the character, availability and at the specified sizes. Question the ability of the existing land to support any but the most resilient trees. Challenge the assumption within the LVIA that the landscape planting will successfully mitigate the visual impact of the development due to the vegetation screening. Growing conditions will never support good tree growth. Challenge the assessment of the low value of the land in character and visual terms. The LVIA is poor in its assessment of the impact of the development on the setting of the National Park and Lancing College Chapel. A key view is missed of the list, which is from the train as it crosses the Adur and past the airport
- The proposed development will impact on South Downs National Park and sites of natural beauty and special scientific interest. The view from Mot Hill (South Downs National Park) will be compromised
- The updated LVIA submission show positive alterations but are still too limited

- This development seems disproportionate for a town the size of Shoreham. The land should be used for progressive exemplary low impact housing and for wildlife improvement, planting trees to absorb carbon dioxide and creating havens for endangered species
- The South Downs National Park is an International Dark Sky reserve. Need to reduce impact of light pollution.
- Impact on biodiversity and ecology. There will be a significant loss of wildlife habitat
- Widewater Lagoon, a recognised Nature Reserve is a mile away from the site. Many visitors come to the area to enjoy this natural habitat. The increased traffic, noise and pollution may impact on birds
- The site is a floodplain. The development will increase the risk of flooding. Groundwater and surface water risk. Foul drainage infrastructure does not have the capacity to support the development. The proposal underestimates the potential risk for flooding
- New Monks Farm site effectively acts as a giant sponge soaking up water as it flows into the area from the surrounding hills via the groundwater system. Developing this site will remove that 'sponge'.
- The pumping station is being provided to address flooding however pumping systems have been known to fail when they are most needed
- Flood Risk Assessment and Addendum - There was no sufficient level of detail in the FRA to demonstrate that the flows into the southern outfall ditches and beyond into land to the south of New Monks Farm at New Salts Farm. Disappointing to see that the Addendum does not contain any studies of dynamic hydraulic model of the ditches. It is not clear if the proposals have considered whether there is additional volume of water discharging into these ditches. It is also not made clear whether run-off from the residential areas of the site are restricted to greenfield run-off rates. All run-off should be restricted to greenfield rates in order to reduce flood risk overall and ensure that run-off is below that prior to development as required by Adur Local Plan Policy 37. The FRA should have used FEH rainfall data and not FSR rainfall data which is based on old records
- There is a long history of severe storms hitting the Shoreham / Lancing coastline
- Global Warming / Climate Change - increased risk of flooding and droughts
- This development falls within a strategic gap. All other applications for development in this strategic gap have been turned down
- Phase 1 does not appear to include the major drainage works necessary to make the development viable in terms of flood mitigation
- Impact on water supply, Southern Water has recently issued a drought order. Water supply cannot cope with current demand. No new reservoirs planned in the south and south east, the threat of drought will only continue to increase
- Site should be used as a community wetlands site accepting that flooding will occur.
- Adur Local Plan requires all new major developments to incorporate renewable carbon energy production to provide at least 10% of predicted energy requirements. The proposed development does not make any reference to renewable energy on a site where solar panels should be included
- Development will change the character of the area. The strategic gaps has long been recognised as a way of protecting against the complete urbanisation of the areas south of the A27. The provision of a country park is really not a compensation for the wild and green space that will disappear
- Site should be used as a community wetlands site accepting that flooding will occur.

Housing

- Recognise that there is pressure from the Government to build new houses however this development will result in a detrimental impact to the area
- Every effort must be undertaken to ensure that a certain percentage of the houses built are affordable. The target of affordable home provision must not be sacrificed on the pretext of viability
- The development will not fully address the housing needs of local people in Lancing and does not provide a sufficient percentage of affordable housing
- What percentage of affordable housing will the development provide? The houses will be expensive and not affordable to the local people

Withy Patch Gypsy and Traveller Site

- The residents of the Withy Patch Gypsy and Traveller Site require a fair and understanding consultation approach
- The Traveller site at Withy Patch is going to be relocated and increased in size. Does this mean that the World War II Dome is going to be demolished?

Social impact

- The development will negatively impact on local residents quality of life with regards to air pollution, noise and visual pollution
- Will impact on residents physical and mental health
- There seems to be no proportionate planning for helping healthy living, a healthy environment or job creation

Infrastructure

- Inadequate infrastructure to currently support any large increases in local population. The extra housing cannot be supported by the local infrastructure. Unsustainable level of demand being placed upon the current infrastructure and services such as education, GP Surgeries, Dentists, libraries, Police etc
- There is a serious lack of secondary school places in Lancing, Shoreham, Southwick and Portslade catchment areas
- Need additional GP provision
- New and improved infrastructure needs to be put in place in advance of any major development
- Phase 1 does not include the community and facilities necessary to support the development, either in full or part (school, community hub, park, infrastructure links)
- Is there a health risk to residents and school children from being situated so close to an airport where the majority of aircraft use fuel containing tetraethyl lead?
- Proposed school should be designed from the outset to provide community use on a significant scale
- Existing infrastructure is inadequate to accommodate the demands arising from the proposed development. Further pressure will be placed upon local community facilities and health facilities

- There is little information provided by the applicant regarding S.106 payments towards public services

IKEA

- Planning condition to be imposed to restrict hours of operation and for the store to be opened from 10am
- IKEA stores rely heavily on almost exclusively car and diesel van customer base. An IKEA store would add yet more traffic and cause further congestion
- IKEA stores are usually located in large urban areas (i.e. Southampton, Croydon, Bristol etc) and have access to a motorway. Lancing is too small to control / sustain visitor numbers
- IKEA would be better sited on or near an existing retail park where the infrastructure can cope with the amount of traffic. Council must not be influenced by considerations of business rate income over and above the interests of the local community.
- The proposed floorspace is in excess of what is specified in the Adur Local Plan
- IKEA stores generate low skilled, low paid jobs. Coast 2 Capital is involved in a long term plan to upskill jobs in the area. The jobs at IKEA keep downward pressure on low wages. This is not a benefit to the local community
- IKEA will impact on small local businesses
- The development will not comply with Policy 5 of the Adur Local Plan by failing to include appropriate employment generating development (Use Classes B1 or B8) and not A1 Retail
- The Policy allocation seeks at least 1,000sqm of employment space. The priority should be for high quality employment needing a skilled workforce and providing links with local colleges, apprenticeships

Summary of public comments including from All-Party Parliamentary Group on General Aviation / HeliFly UK Ltd / PerryAir Ltd / Sussex Flying Club relating to Aviation - 11 representations

- The scale and location of both the Hybrid and Outline application is cause for concern
- Shoreham Airport is not safeguarded
- What was the result of the Council's check against the safeguarding chart?
- Civil Aviation Authority must undertake a full Aerodrome Safeguarding Study before any permission is granted. This will identify whether are acceptable or capable of mitigation by placing operational restrictions on the aerodrome or modifying the development
- Is there a formal Safeguarding Agreement between the Council and the Aerodrome operator?
- Was that Safeguarding Agreement taken into account when considering the Local Plan?
- Is the Safeguarding Chart for Shoreham up to date?
- Has a full safeguarding study in relation to the application, including the location of the helicopter circuit, been carried out and if so, what are the results of that study?
- The proposed development is in the approach path of grass runways 13 and 06 and in the climbout of aircraft departing reciprocal grass runways 31 and 24
- The development is directly below and adjacent to the Helicopter circuits on the western side of the airport which are in continuous use. This will create a serious and

ongoing noise problem as the proposed development now brings it much closer to the helicopter training grounds

- The helicopter circuit has been in place for years and keeps fixed wing and rotary traffic safely separated whilst also minimising the noise disturbance to residents. This land also enables fixed wing pilots the ability to make a right turn after taking off from runway 24 to reduce overflight of housing and noise
- The development does not allow the peace and safety of those living in the area proposed. The development will introduce a serious risk factor
- Any purchaser of property in the area should have some caveat emptor clearly explained to them. Any planning permission should have a guarantee that no retroactive attempt to hinder or curtail, change or amend any movements, flight paths and or circuit patterns at Brighton City Airport
- Concerned that if this development were to go ahead without aviation law and regulations being considered, restrictions would be put on operations that would make it impossible to operate aviation related business at the airport and would have to move to an aerodrome.
- Impact on the attractiveness of the airport for training
- This would have a negative impact on revenue, local skilled employment and the contribution to the local economy
- Development could potentially lead to closure of the grass runways, create turbulence and increase bird strike risk
- Development will result in the removal of open spaces available for a forced landing in the event of emergency / reduce safety margins for pilots and residents
- Complaints will be received in relation to noise from the residents of 600 houses which in turn create pressure on the airport to reduce its activity or close completely
- Will impact on the viability of the airfield
- Impact on helicopter operations and will jeopardise helicopter businesses operating at the airport. Disappointing that helicopter operators have not been approached to consider how the plans could be improved to reduce noise and improve safety
- No noise survey study has been produced. Helicopter noise is far more complex to measure and assess than fixed wing aircraft noise
- Air law states that an aircraft may not fly closer than 500 feet from persons or property
- Shoreham Airport is the only airfield of its kind in the area and the risk of losing it to development would cause great harm to the transport infrastructure and employment in the aviation industry
- Government is consulting on a new Aviation Strategy and sees the UK aviation sector as a global success story and thus it is vital that Shoreham Airport is fully maintained
- The developer is paying £6 million to the airport. Is this payment to The Albermale companies in administration, the airport operator Brighton City Airport Ltd or both?

Summary of individual public comments / Friends, Families and Travellers relating to Withy Patch Gypsy and Traveller Site – 2 representations

- Residents are concerned about the material change to their environment and feel that their views and wishes have not been taken seriously
- Insensitive development
- Lack of meaningful consultation engagement / dialogue with residents of Withy Patch
- Object to the proposed relocation and extension of the Withy Patch
- Air pollution

- Traffic congestion
- The proposed layout of the site is not linear and therefore there will be limited privacy
- Whilst the site will be larger than the existing site, the plot sizes will be smaller as there will be more plots accommodated in site
- The residents will be living on a construction / building site for 2 years
- Access / Egress
- The site will be positioned like an island amongst two roundabouts
- The site will be close to the airport and will be subject to noise / increased health and safety risk
- Flooding risk
- Drainage
- The residents will be further away from educational facilities
- Lack of GP provision
- Gypsy Roma Travellers are more likely to suffer from ill health. The residents fear that a relocation to an even more inappropriate location will exacerbate any existing health conditions
- Impact on quality of life

Summary of public comments including from British Horse Society / West Sussex Local Access Forum relating to Public Rights of Way / Bridleways – 5 representations

- Proposal needs to meet the requirement of Adur Local Plan Policy 5
- Understand from the Amended Plans and FIES, para 2.5.1 that the applicant will be making a separate planning application for a proposed bridleway link between footpath 2049 and that the footpath will be improved and widened. Supportive of a grade separated link across the A27, remain convinced that the route proposed is a viable option that can be delivered
- The route under the flyover is prone to flooding, and the headroom available does not comply with BHS guidelines on underpasses for ridden horses, the ideal height being 3.7m (minimum of 3.4m) and an ideal width of 5m (minimum of 3m)
- This development offers the best opportunity for the delivery of a grade separated non-motorised user crossing of the A27
- Consideration should be given to the provision of a bridge between Old Shoreham Road and Coombes Road to provide the most direct and convenient crossing
- The alternative proposed at present, using the FP 2049 under the A27 raises serious concerns as to its suitability for all non-motorised users as it fails to meet current standards for a bridleway regarding height (minimum 3.4m) and width (minimum 3m, preferably 4m for a well-used path)
- PROW 2049 - discrepancy between the legal status of the path described in the 'Summary of Additional Information' and the Drawing referred to in the Summary (VD14260_SK_0101C) requires clarification
- Bridleway - width shown of 2.5m would only comply with normal WSCC standards for a walk / cyclepath. Narrow width may cause conflict between users
- Safety concern over the narrow width (0.5m) between the path and the slope down to the river
- Whatever alternative crossing of the A27 for non-motorised users is provided, this must be in place prior to the removal of the Sussex Pad traffic lights

- What safety measures are being put in place for horses and cyclists with the new plans for the roundabout going ahead?
- Approximately 30 horses at Lancing College Farm and Lancing Equestrian that use the bridleway regularly

Other Groups and Local Organisations

Adur Residents Environmental Action Group (AREA) Objects to the proposed developments on the grounds that,

- *"The site is **a flood plain**. The development will create further drainage issues for local residents with roads flooding and sewage backup. Doubts have been raised about the effectiveness of proposed mitigation measures.*
- **Traffic** — *The A27 is already a congested road at peak times. The official traffic count in 2014 was 52,651, rising to 58,489 in 2015 and estimated at 60,408 in 2016. So by now it must be nearing at least 63,000. The cumulative effect of 600 extra homes at New Monks Farm, plus further traffic from the commercial development at the airport and at least 5,500 extra journeys daily from visitors to IKEA will create even further gridlock with an average cumulative effect of 8,000 additional journeys. This will affect local residents, commuters and businesses. Highways England has not yet produced a viable plan to solve the existing traffic congestion let alone future congestion.*

The NPPF states in Paragraph 32 that "plans and decisions should ensure that developments that generate significant movement are located where the need to travel will be minimised". IKEA will definitely create significant movement of traffic. The developers are planning to build a one form entry school sited near a polluted, busy road and beside the IKEA warehouse where the lorries will be unloading. We have little faith in a developer or architect who consider this an acceptable **plan**.

- **Air quality** — *There has been no measurement by the Council along this stretch of the A27 between the Shoreham flyover and the proposed IKEA. As the Council knew for some years that these developments were proposed, we believe the council failed in its duty to monitor the **air** quality. No accurate base line can be established on which the modelling of future air quality could be based. However, diffusion tube readings taken over 3 weeks by AREA **showed levels of NO2 up to 54.2, 35 1/2%, over the legal limit**. There has been no measure of particulates, which are carcinogens, and give rise to serious respiratory problems and increased risk of strokes and heart attacks. Given the certainty of a large increase in traffic there will be an accompanying increase in air pollution. We are concerned that the increased "traffic congestion and associated air quality problems will have an effect on economic performances in terms of productivity." We are concerned that we have seen no assessment of the increased expense to the NHS of dealing with an increase in respiratory problems, particularly asthma in children. With no assessment how can an informed decision be made about the long term economic effects of this development?*

"Poor air quality tends to affect the more vulnerable in communities". The travellers at Withy Patch, the travellers site near the proposed IKEA are a case in point and they are being asked to move to a site which is near the proposed new roundabout on the A27 and also by the secondary roundabout that links with the airport road. So, hit from both sides.

- **Cumulative impact** — The increased traffic on the A27, will impact on the **AQMAs** in Worthing and Shoreham and the connecting roads such as the A283 as cars try to avoid the A27 queues. The A283 is already congested, polluted and dangerous as it is very narrow , with parking on both sides. It is used by a large number of lorries. There are long queues to the Ropetackle roundabout on the Shoreham High St which is already at or above capacity.
- **Cardiff IKEA** — Comparison was made with the Cardiff IKEA. That is **invalid**. The Cardiff IKEA is considerably smaller, is on a retail estate not a flood plain, is not overlooked by a building of architectural and historical heritage (Lancing College), is not beside a National Park, is not on a flood plain, and most importantly has an approach road with no roundabout or pinch points. Traffic for the Cardiff IKEA exits and enters via slip roads. Traffic for the Lancing IKEA would have to negotiate a series of roundabouts, some with lights, on the A27 the A259 and the A283, through residential areas. There is **NO COMPARISON**. We urge your developers to look at this in detail.
- The argument put forward that because fewer IKEA customers will be passing through the Southampton and Croydon AQMAs because they will be driving to Lancing is ludicrous and shows no concern for Adur residents. There will be an increase in the total number of cars passing through AQMAs. Because of the proximity of the proposed Lancing IKEA people who might normally make a journey to the Croydon or Southampton IKEA a few times a year will be going more frequently, but to the Lancing IKEA. If IKEA and the Council accept that argument as a point in favour of this development then you are not considering the future of the residents. It ignores the fact that Shoreham and Worthing already have AQMAs and the increase in traffic will only make things worse. The traffic will not just mainly come from the north and east as stated in the developer's plan. Cars from as far as Arundel to the west will come to Lancing along the A27 through the Worthing AQMA and along a road for which Highways England can't produce an adequate plan to alleviate the current gridlock. Cars from the east will also use the A259(AQMA,) the Upper Shoreham Rd (A270), a residential road, and the A27.

Stating that IKEA will not open until 10 overlooks the fact that the employees will be arriving well before 10 during the rush hour and fails to mention that the store is normally open for viewing at 9:30. The afternoon rush hour on the A27 begins at 4pm so IKEA employees will be adding to the congestion.

- We fail to see how replacing the traffic lights at the Sussex Pad on the A27 with traffic lights on a new roundabout a bit further west will alleviate the traffic

gridlock. It will mean that cars emerging from Lancing College and wanting to head west will have to go to the Shoreham flyover to do so. That will only add to the traffic and congestion on the flyover. Also, traffic emerging from IKEA and the development will be considerable and, as a result, there will be a queue at the traffic lights at the roundabout stretching back towards IKEA and into the housing development. The increased traffic from the commercial development on the airport and IKEA traffic wanting access to the A27 will mean that there will have to be an increased time for that traffic to enter the A27 and that will lead to further queues on the major road.

*It is quite unbelievable that, despite all the concerns and objections the community has raised over the last 4 years against this site being included in the local plan, the **local residents are being ignored**. One only need look at the 1100 letters of objection on the Adur and Worthing council website and the signatures of 1512 people on the petitions to appreciate the strength of feeling. It takes a lot of anger to motivate people to voice their concerns in writing. We are not nimbies. Our concern is for the health of the residents of Adur who will be breathing in increasingly polluted air, particularly as they sit in traffic jams throughout the district. Drivers and passengers in cars in traffic jams are 10x more affected by air pollution than cyclists, according to the recent parliamentary inquiry into air quality! Is it any wonder local residents and those who regularly use the A27 and A259 are concerned and angry? The information presented to the Inspector of the Adur Local Plan concerning traffic and air quality was hopelessly inadequate and barely got a passing mention. The Council and developers have failed the residents by not making the **Inspector** aware of the extent of the existing problems.*

*This is a highly complex site to develop and even the official consultees are finding it hard to obtain the evidence to prove its sustainability. If there is any doubt that improvements to the road structure, the infrastructure and other mitigation measures will be effective in tackling the increased pollution, traffic and lack of infrastructure, including sewage, then **IKEA must not be built**. Lowering the height by one metre does not make this plan acceptable or viable.*

Submitted on behalf of the 160 members of AREA and 7 other residents' groups."

Lancing College objects to the application and has made a number of representations to the scheme as summarised below:

Initial Objections

- Lancing College is home to 265 staff and 600 pupils and draws a number of visitors to the estate. The size of the College estate at 500 acres is greater than the New Monks Farm site (NMF).
- In employment and economic terms, the College has been long recognised to be one of Adur Districts major employers. The nature and breadth of the College's education role and the breadth of the other obligations that Colleges carries out as custodians of the estate, means that there is very wide economic social and environmental benefits which extend well beyond the estate itself.

- In monetary terms the College's contribution to the local economy outstrips the stated benefits of the NMF development. The College pays £150,000 to Adur District in business rates and council tax payments and it contributes annually £10 million in staff costs, £2 million to local contractors, £600k on catering and £2 million to student bursaries and scholarships. The College also pays in excess of £1 million VAT payments to Central Government and provides access to community facilities to local groups and organisations.
- The College must ensure that it can function efficiently and effectively in the interests of its large and diverse community, and that it can maintain its reputation and attractiveness to pupils and parents. Its fundamental requirements are to ensure that the setting of the estate's significant Grade I, II* and II listed heritage assets are protected, the estate remains full accessible from Coombes Road and Hoe Court, there is convenient and safe access for staff, pupils and visitors who travel on foot, by car or by bus. Equestrians and cyclists are also afforded safe and convenient access across the A27.
- The College objects to the retail store taking up a strategic employment site. The traffic and linked effect generated by the store will be negative and not an appropriate employment use indicated in the site allocation.
- It is questioned why the Council would abandon all other employment opportunities on the site.
- If there is a viability case that demonstrates the proposed 600 homes cannot support the funding of the linked infrastructure works, what evidence has been provided that other opportunities have been explored to either work with Highways England (HE) or with Coast 2 Capital LEP or other funding opportunities?
- The socio-economic chapter of the application indicates that the proposal would have major benefits to the local economy but it would result in a single isolated retail outlet that would draw occasional visits from a large customer base with minimal of any linked trips undertaken to other destinations and local economy.
- The ES Landscape and Visual Impact Assessment (LVIA) demonstrates the proposed IKEA will be visible from various parts of the College estate, including part of its main campus and its nationally listed assets. However, the LVIA goes on to ignore this and relies on the physical distance between the main College campus and the presence of some screening within the College estate along the A27. The landscape screening of the IKEA site is identified as a key mitigation and yet landscaping is a reserved matter.
- There is a lack of detail in the ES about the impact of the development on the landscape, more viewpoints should be taken from within the College campus and post development CGI visualisations of the site taken from viewpoints east and west along the A27 and from the Hoe Court junction looking towards the site should be provided.

Traffic Impact and Access

- An initial review of the TA has identified significant emission and flaws in the Technical Transport Appraisal.
- The proposed new roundabout replacing Sussex Pad junction is unacceptable. Once completed vehicles exiting Coombes Road and needing to travel west will need to first go east all the way to the Shoreham flyover and then journey back. Those travelling from the east and needing to access Hoe Court will need to travel a substantial distance westbound well past the estate before being able to turn back, or they will

need to take an illegal 'U' turn at the newly configured Grinstead Lane, Manor Road junction.

- The combined effect of both NMF and HE works to the Grinstead Lane roundabout will require significant east and then west bound diversions, significantly impacting on the large and diverse user groups at the Lancing Community.
- The diversion routing effects will significantly impact on the functioning of the College estate, increase traffic movements circulating along the A27, increase traffic at key junctions, impact on those no vehicle users wishing to cross at those junctions and increase the routing for very large delivery and farm vehicles in addition to coaches, minibuses and cars.
- The proposal will significantly affect safety concerns for pedestrians, cyclist and equestrians resulting in long diversions and multiple crossing points at the roundabout with resulting safety implications.

Further objections from Lancing College to the further information consultation (February 2018)

- A significant part of the NMF case rests on the economic benefits, however, this fails to acknowledge and take into account the significance of Lancing College to the local economy and wider community based provisions which may be put at risk as a result of the development.
- The priority for Adur in employment terms (given its low unemployment rate) should be to first support and help retain and grow existing businesses and not put at risk existing businesses, especially those with proven long term sustainable benefits.
- The submitted ES refers to the College as being an independent school which draws from a wide catchment but this ignores the fact that the College provides free and supported bursary places to local skilled children and provides a large number of jobs for local people directly and through its local supply chains.
- The proposals affect the operational efficiency and attractiveness of the College and as an events venue which reflects the College's future viability. Any financial impact on the College would have far reaching implications for individuals and community service providers.
- The declared benefits of the NMF proposals to the local economy and community do not outweigh or justify the risk to the College and its contribution to the local sustainable, economic and social development.

Retail Planning Tests

- IKEA has announced its intention to test new retail formats to get closer to UK customers and this follows a general trend for large format retailers (Sainsburys, Marks and Spencers and John Lewis increasing a chain of smaller outlets for 'click and collect' facilities).
- The NMF Retail Assessment does not address the greater flexibility that IKEA is now applying to its new store programme and, therefore, the application fails to meet the requirements of NPPF and Adur Local Plan Policy 27.

Transport Impact

- NMF has underestimated levels of traffic generation, inadequate provision has been made for pedestrians, cyclists and equestrians and the proposed new routing on the A27 will add 690,158km in journey miles on the A27 every year.
- The minor additions and changes that are proposed to link across the A27 and the now proposed NMU link into the National Park do not resolve the College's concerns about the impact of the development on its operations.
- The County Council refers to a possible fourth arm being added but this does not form part of the application and cannot be considered as part of the proposals or the mitigation response for the detrimental impacts and harm that the development will cause.
- With all traffic impact and access arrangements still unresolved, the application must be refused on the grounds that it is contrary to the requirements of the NPPF and Local Plan Policies 5 and 28.

Air Quality

- The applicants Air Quality Assessment is based on flawed traffic assumptions which do not take into account the additional vehicle miles that will be added to the A27, therefore planning permission should be refused on the grounds that it is contrary to Local Plan Policy 34 and the NPPF/NPPG.

Landscape and Visual Impact and Impact on the Setting of Heritage Assets

- The inclusion of the College within the National Park is determined by the landscape character of its estate and it is, therefore, subject to the nationally defined purposes and objectives of the National Park and the planning controls that protect it.
- The Strategic Gap provides a critical contribution to the setting of its heritage buildings. The open foreground and setting will be substantially harmed by the IKEA store and operations with its large block building that will be further defined by bright primary corporate colours, additional corporate signage, illumination paraphernalia and linked activity.
- The harm will be from not only outside of the College estate when viewed towards it but also from within the estate, including from positions that have not been considered and appraised by NMF and which are relevant in heritage and landscape setting terms.
- The further information ES (FIES) visualisations are unacceptable and do not appropriately assess the true landscape and heritage setting effects of the development.
- The IKEA store will result in a substantial slab of alien corporate blue and yellow which will sit imposingly within the foreground of the protected SDNP and the College buildings and within the open setting that provides inter-visibility between the College and the Airport buildings.
- IKEA's insistence that its corporate branding is applied within this environmentally sensitive location will not be mitigated through proposed tree planting.

- The store will substantially harm the landscape and heritage setting impacts of this nationally important College estate and will result in linked commercial and operational harm to the College. This harm will not be outweighed by the socio-economic benefits that NMF has assessed it will provide. The application, therefore, must be refused on the grounds that it is contrary to NPPF and Local Plan Policies 5 and 14 and Local Plan Policy 17.

Viability

- Public funds should not be allocated to this flawed and detrimental scheme even if additional funds might resolve access issues at Coombes Road. There will still be an unacceptable impact for NMUs and substantial harm to the landscape and heritage setting of the nationally important College estate.
- The viability case to justify the IKEA store does not stand up to scrutiny when assessed against the aims of securing long term sustainable development that will secure net local benefits and good value for the use of public funds.

Lancing College objects to further amended plans (May 2018)

- The College's concerns about traffic generation arising from the proposed IKEA store, and the proposed employment space on the Airport remain.
- The College confirms that it is in discussion with NMF on the fourth arm access proposals which would require an application to the SDNP. The fourth arm is required to address a number of access and linked environmental and operational issues and until such time as this matter is resolved, and a commitment is made to the fourth arm being delivered and appropriately phased, the College's objections on this matter will stand.
- An undertaking by NMF that they will apply their best endeavours to agree and deliver an appropriate solution is unacceptable and no planning approval can be granted on such a basis. Continued direct east and west bound routing from Coombes Road is essential to the College just as access connectivity and linkage are critical to all commercial and community organisations. The College accordingly seeks assurances from the Council that any such grant of planning approval for NMF will be tied to the delivery of an already identified and agreed solution.
- The College welcomes NMF's proposals for improved NMU links across the A27 but they do not meet required minimum design standards for what will be an important well used shared route for pedestrians, cyclists and equestrians.
- The updated LVIA sets out design mitigation responses for the IKEA store, which seek to reduce its impact on the setting of the SDNP, these are noted as positive alterations but are still too limited. Graduated lighter panelling along the north elevation must be increased as its bold sections still remain too extensive. Extensive tree planting must also be increased to soften the impact of the building and the extent of planting with the car park should also be increased.
- CGIs of the IKEA store have been requested from the outset and, given the sensitivity of this site within its setting, these are still needed to help the Council and local and national stakeholders appraise the impact of the development and the effectiveness of the mitigation measures.

The British Horse Society expresses concern about the alternative crossing point under the River and states that,

"I understand from the Amended Plans and FIES, para 2.5.1, that the applicant will be making a separate planning application for a proposed bridleway link between Footpath 2049, which is now included within the application site red line, and Coombes Road, and from para 3.1.4 that Footpath 2049 is proposed to be improved and widened (and it is assumed upgraded to bridleway status), to enhance access into the SDNP.

Whilst I would certainly be supportive of a grade separated link across the A27, to retain the connection severed by the removal of the signalised junction between Old Shoreham Road and Coombes Road, a well-used and popular desire line for all NMUs, I remain to be convinced that the route proposed is a viable option that can be delivered.

It is known locally that the route under the flyover is prone to flooding, and the headroom available does not comply with BHS guidelines on underpasses for ridden horses, the ideal height being 3.7m (with a minimum of 3.4m), and an ideal width of 5m (minimum 3). In exceptional circumstances a lower height may be tolerated, to retain a crossing of a road which would be unsafe to cross at grade, and where there is no option to increase the height, such as where the water table is high, but this would need to be agreed with the Society's local representative. I would suggest this could best be discussed at a site visit.

The applicant needs to meet the requirement of the Adur Local Plan, Policy 5, "Improved access across the A27 to the South Downs National Park for pedestrians, cyclists and equestrians must be provided", and I do have a number of concerns regarding the suitability and successful delivery of the proposed link route. Until such time as more detail is available on the route proposed, and information on how this can be achieved, it is considered necessary to raise an objection to the application."

The Southview Area Residents' Association objects to the application on the grounds that,

"Currently, the existing highway infrastructure surrounding Southwick, i.e. A.259 and A.27 Old Shoreham Road, is under considerable strain particularly during rush hours when gridlock regularly occurs, despite the implementation of the Brighton Bypass which the writer on behalf of our membership & Southwick residents fought so hard for at the year-long public enquiry held in Brighton. It should be noted that Adur D.C. at that time objected to this Bypass, hence this Association's action.

While on the one hand we appreciate the need for additional housing which is currently needed, we are most concerned about the inclusion of a large commercial building to house IKEA. The applicant's own data confirms that this company alone will create an unacceptable traffic burden on neighbouring towns such as Shoreham & Southwick which will undoubtedly cause chaos on the aforementioned roads. Bearing in mind IKEA will attract an enormous following from Brighton, Hove & other towns to the East which will traverse along the A.259 & A.27.

We would also point out that according to Adur's Local Plan, the A.259 is already designated to encourage residential properties. Already there are two large applications submitted for the erection of large blocks of flats, in addition to the one already under

constructions, thereby creating more unacceptable traffic pressures on this road, this factor added to the foregoing IKEA premises will create an unacceptable vehicular pressure on this & Old Shoreham Roads as well as contributing to the existing air pollution problem. We would, therefore, request that the inclusion of the IKEA premises in this application is "refused".

Adur Green Party objects to the application on the following grounds,

- *"We do not believe that this proposed development comprising the large retail outlet together with the proposed housing is a solution to local employment and housing need and we have serious criticism of the environmental impacts of the scheme.*
- *Adur Green Party is not against developments which provide homes for local people. We especially welcome housing that is affordable, sustainable and used to provide for key workers and people who are homeless or in temporary or insecure accommodation at present. Such housing should also be accessible to local town or district amenities and built with awareness of environmental and visual impact in both the long term and the construction phases.*
- *The plans submitted pose unacceptable environmental hazards in the form of significant increased risks of flooding with no worthwhile assurance of successful mitigation, increased traffic congestion from a car-centric retail development and severe associated air pollution all of which outweigh any benefits of from using this site to meet local housing needs.*
- *There is real concern that if the development is allowed to proceed the costs of attempted mitigation measures in respect of water flows, traffic congestion and other environmental impacts will be used as a potential financial escape route by the developers who will then fail to meet the modest affordable housing numbers in the plan. We fear, from seeing what has happened in developments elsewhere in the country, that the developers may not be unaware of this.*
- *There are very real risks to the quality of life for people in North Lancing and the health of residents of Shoreham and Lancing from the increased air pollution and congestion. The overall benefits are very unclear.*

We strongly urge the local authority to prevent the building of an IKEA on this site and to reconsider the use of this land for housing until further research has been conducted into: worsening congestion on the A27, additional air pollution (NOx and PM2.5s which trigger and exacerbate asthma and other breathing difficulties), whether toxic waste materials exist on the site and the increased risk of flooding.

Adur Green Party would wish to comment further when any additional research into these matters by stakeholder bodies is available."

Representations Supporting the Proposal

As of the 10th July 2018 there are **126** letters of support for the proposal.

Petitions

One petition of support has been received signed by 216 local residents on the basis that,

“it brings much needed housing and employment in a development located centrally in the Adur and Worthing area. The draft local plan delivers 3000 out of a required 6000 houses to meet projected population growth, this is just 50% of the requirement. New Monks Farm delivers 20% of the Councils planned housing, the recently published revised government formula requires an increased level of house building for the future so pressure will increase further. Housing prices in the South East are increasingly unaffordable as demand outstrips supply, increasing the level of supply to meet demand is widely recognized in economic terms as a way to reduce prices.

In terms of employment opportunities, having spoken to IKEA they offer a foundation living wage which is higher than the national living wage, they offer pensions, employee shares and will be offering a range of opportunities both full and part time which will create income for the local economy. Construction on the will create employment for tradesmen for years, in addition the ongoing maintenance of the site and planned school will create further jobs.

The Country Park will provide an accessible resource for local people, it also improves the biodiversity of the site which may increase the types of wildlife, flora and fauna seen on the site.

The support is on the proviso that the statutory bodies such as the Highways Agency, Southern Water and West Sussex County deem the infrastructure to manage drainage, flood risk and traffic as suitable. The developer has addressed all of these issues in the planning application, the signatories are not experts in these fields so trust the statutory bodies to complete a robust assessment of these plans, if they agree the infrastructure is suitable the application should be approved as it brings many economic and social benefits to the Adur and Worthing area.”

Individual Comments (SUPPORT) – 122 Letters

- The amended plans are a significant improvement. The landscaping and attention to non-vehicular traffic is commendable
- Concerns over flooding appear to have been alleviated with mitigation measures
- Responses from West Sussex County Council indicate that the roundabout proposed will mitigate the impact of any increased traffic arising from development
- This development will help raise the profile of the area in light of the number of companies and businesses having left or due to leave the area. The proposal will help to revitalise and regenerate the area and make it an attractive place to live and work
- The wider economic benefits need to be highlighted, especially in the context of a constrained environment in which we sit. This development provides new employment floorspace but more so has the potential to add £11.4 million GVA to the local economy. Within this, there are real opportunities for our communities to step into, and access, new jobs (circa 400) whilst the additional residential units will assist with the growing demand for housing

- It will provide much needed investment opportunities and employment opportunities supporting a variety of skill levels
- New homes and jobs are vital for the future of the Adur and Worthing local economy. The £11.5 million annual additional economic impact proposed will help drive forward the area's local economy and business growth
- A profile company such as IKEA will generate visitor tourism to the area and it will put Lancing on the map
- The mix of residential and retail development and improvements to the roads in the vicinity makes this a valuable development in an area per of the country suffering from a severe lack of available housing.
- The provision of new housing and associated infrastructure will be of benefit to the local community and the wider sub-region
- The provision of housing and affordable housing will support first time buyers and local families living in the area
- Support the provision of a new primary school
- The development will enhance the look of scrubland and make effective use of underused land
- The development will result in more traffic however this needs to be balanced against the added value that the development will bring to the area
- Electric vehicles will replace petrol / diesel cars in the future
- The Council and highway agencies need to make relevant changes to the infrastructure to ensure that this development will be a success and benefit to all

Groups and Organisations (SUPPORT)

Ricardos supports the application in principle but have made the following observations,

"The developments must exude excellence and enhance the current excellence proposition we have around the locality including:

- *The Elite Performance Centre*
- *The Airport as a training location (flying schools and GBMet)*
- *Heritage — the Airport Terminal, Dome, Toll Bridge and Lancing College*
- *Lancing College - education and large local business*
- *Landscape and environment — River Adur SSSI and SDNP*
- *Ourselves - technology and manufacturing*
- *The emergent Growth Hub (see below)*

Adding housing and retailing excellence are potentially exciting enhancements.

The infrastructure excellence in all its forms needs to be in place before or during development and not lag. The drainage approach is a good example of this.

The following points are both wide ranging and specific to one or both developments

Traffic and junctions design

Overall traffic schemes

- *We see it as essential for the A27 schemes and any WSCC highway improvements are presented in a coherent and timely manner noting all expected developments that affect the network, the expected Local Plan content and construction sequences*
- *The same applies to planned road maintenance and utility work — "dig once" is encouraged*
- *We are frustrated that the highways authorities have not presented the implications for air quality, both at local hot spots and across the affected network — its a key part of whole community environmental impact assessment*
- *We want to see how the traffic flows along the existing A27 will be addressed post construction of the developments in the applications — we are aware of discussions, but want to see consensus output, so we have to reserve our position on this matter. We need to see some graphical simulations of all the flows as requested in April 2017 re whole road network and related discussions — this will help the business and our employees understand in more detail for all transport modes — this should come from the highways authorities*
- *We would hope the new developments create demand for useful and frequent bus routes which would be of use to our employees commuting from the east and west*
- *We expect to see improved cycle routes to the west, past Grinstead Lane*
- *We await some data from NMF re impact on our Real Driving Emissions (RDE) route times and speeds*
- *We await detailed discussion with developers on through airport (rat run) traffic changes, noting we have a car park on the airport — we support the tone about agreeing the approach to this with airport tenants and users*
- *We cannot comprehend the differences in design approach for the Grinstead Lane junction between HE and NMF. Intuitively, the NMF design make more sense and preserves more trees*

Sussex Pad Junction

- *We accept that the location is as far east as is possible, noting the multiple design constraints*
- *We are very disappointed that the Coombes Road side does not have east/west access — we strongly encourage a future application for this and ask the Council, SDNPA and WSCC Highways have an agreed approach for this prior to the applications going to Planning Committee — it's important for Park access, sustainable transport for our staff, particularly in the summer, and our drive-by test site, as well as for Lancing College*
- *Crossing the A27 on foot and by cycle — we agree with Lancing College that there is a high safety risk if there is not an easy route for pedestrians/cyclists and would want to see central reservation fencing. We are encouraged by ideas around a route under the A27 at the NE corner of our site and upgrading the west side of the Adur foot path to a bridle way*

Construction impact

- *Due to our dependence on the road network and consistency of journey times and speeds needed for our RDE testing which is revenue generating, we would seek a condition that ensures we have plenty of warning of construction and we get predicted changes to route characteristics at each stage of construction in any scheme, whether it be from a developer, utility or highways authority*
- *Managing work on these applications and Adur Tidal Walls will need good coordination — we will work with the Airport, developers and Environment Agency on this*

Infrastructure — other than roads

- *As a major electricity user, we are concerned on the impact of the local 11kV network — its already fragile and would expect some more engagement from UKPN — a condition to increase resilience in advance of demand increase, noting future demand expectations (below) is expected*
- *We would expect substantial provision for Electric Vehicle (EV) and Plug-In Hybrid Electric Vehicle (PHEV) charging, supporting infrastructure and smart grids in the commercial and housing developments — in 20 years, it is likely that half the new vehicles will need to plug in We would suggest the following (IEC 62196-2 for AC and 62196-3 for DC):*
 - *Mode 1 for housing*
 - *Mode 2/3 to retail car parks*
 - *Mode 4 for EVs or PHEVs used in distribution depot based from the developments*
- *We would expect all the south facing housing roofs and the commercial buildings to be equipped with solar panels — the Port are a good precedent for this*
- *We would expect ultrafast broadband (fibre to inside property) to be a condition*

Regeneration

- *It is essential the developments related to the airport support economic viability and airport operations — in that sense we see the airport as an airport operation and an "industrial estate"*
- *The airport development must be clear on how the Greater Brighton City Deal "Environmental Growth Hub" is delivered. The Council is committed to this as it is a signatory to the Deal. If the anticipated change to an "Advanced Engineering Growth Hub" materialises, this will not change the underlying need. From what we can see, the types of use are fine and we would provide a support letter for a future LGF bid to help make the innovation space need economically viable*
- *Our employees would like to know a lot more about housing affordability good housing within walking or cycling distance is a potential recruitment plus for the business and a transport flow mitigation for the community."*

Coastal West Sussex supports the application and comments that,

"The New Monks Farm development supports the aspiration outlined in Adur's newly adopted Local Plan and is of significant and strategic importance for the coastal economy.

The whole development will include the delivery of:

- *600 new homes of which 30% will be affordable*
- *875 new jobs*
- *New community facilities including a new primary school and community hub*
- *New infrastructure including pedestrian and cycle footways that will improve access across the area and importantly create a new link from the coast to the South Downs National Park; create a new junction on the A27 which will open access to Shoreham Airport; deliver broad flood and drainage solutions*
- *A new 28-hectare County Park — an area that is not currently accessible to the public*

The new IKEA development is welcomed as it will bring employment opportunities for over 400 people across all job levels, from shop floor and warehousing to managerial levels and an Apprenticeship Programme to encourage the next generation into employment. The store will attract people from outside the area to come and visit, creating an opportunity to entice these visitors to see other areas of the coast beyond IKEA.

It was also noted that the new employment land designated on Shoreham Airport will significantly benefit from the new access from the A27 which is very welcome as new commercial space along the coast is in high demand as there is such a shortage.

In summary, the CWS Partnership strongly supports this application as it will deliver jobs, homes and offer significant wider community benefits for the Coastal West Sussex economy.”

The Greater Brighton Metropolitan College comments that it fully support the above planning application for the regeneration of land at New Monks Farm, Lancing and states that,

“The College is a key local stakeholder and neighbour to the site with our facilities at Shoreham Airport and we have been observing the development of the proposals via the Airport Consultative Committee. More recently, the College's Executive team received a presentation and briefing on the New Monks Farm development proposals.

Our support primarily focuses on the significant regeneration and economic benefits the completed scheme will provide not only for the Lancing and Adur economies, but also how they will contribute to the Greater Brighton City Region. We understand these benefits to be a £150 million capital investment into the local area providing over 870 jobs including over 400 that would be generated by IKEA and the remaining being within local construction jobs.

We welcome the inward investment of a highly regarded international business in IKEA and the new jobs, work experience, training and apprenticeship opportunities that they will provide. As the area's leading provider of Further Education, apprenticeships and construction and craft trades, we are looking forward to working with both New Monks Farm and IKEA to maximise these learning and career opportunities for young people.

At the appropriate time, the College would welcome further detailed conversations with New Monks Farm and IKEA to work collaboratively to ensure these new career opportunities are secured for local young people and residents.”

Menzies Administrators

“I am writing on behalf of Albemarle Shoreham Airport Limited in Administration (the owners of Shoreham Airport) to fully support the planning application submitted by New Monks Farm Development Ltd.

The Airport and New Monks Farm Development Ltd have been successfully working in partnership for over 18-months to develop and agree joint transport and flood/drainage strategies that will benefit the developments on both our sites which will be formalised in a collaboration agreement.

We fully recognise and support the wider economic and housing benefits the New Monks Farm scheme will deliver for the local economy, including;

- *A £150 million capital investment;*
- *The delivery of 600 new homes, 30% of which will be affordable;*
- *876 gross new jobs;*
- *£2.8m in public sector receipts from council tax revenues, new homes bonus and new business rates; and*
- *£11.5m additional annual GVA to the Adur economy.*

In addition, my advisers have confirmed to me that, the scheme will deliver wider community regeneration benefits such as a new single form entry primary school serviced site with expansion space; the relocation and expansion of the Gypsy and Travellers site with four additional pitches; and a new 28 hectare country park with new ecology habitats, cycle and foot pathways to access the South Downs National Park for residents and visitors.

When considered together with our own 25,000 sq. m commercial development planning application, the proposed developments at New Monks Farm and Shoreham Airport will make a positive and significant economic impact to the Greater Brighton Sub-Region. Independent assessments estimate the value their combined economic impacts as:

- *£182 million capital investment;*
- *1,328 gross jobs created;*
- *£3.48 million in public sector receipts; and*
- *£23.7 million additional economic impact per year.*

I also welcome the position taken by the Shoreham Airport Consultative Committee at its meeting in October 2017 to formally fully support both the planning applications from New Monks Farm and Airport Commercial Development.”

The Worthing and Adur Chamber of Commerce are in favour of the proposal subject to the points made below in relation to infrastructure,

"We understand that the scheme will deliver a good mix of housing (including social housing) and community spaces including a school and hub, as well as an important and prestigious retail space to be used by IKEA.

The proposals also include an element of landscaping along with a country park. This park will be an asset to the wider community in both Worthing & Adur and beyond and will provide access to land which to date has been fairly inaccessible.

This combination of housing, community space, flood prevention works and parkland together with the employment opportunities that the commercial element would provide will bring into use land that is currently of limited value. We believe it will provide a significant number of new jobs, economic benefit and other opportunities to existing businesses in the area.

We further understand that through an associated investment, the development will help to secure the long term viability of Shoreham Airport which as a Chamber we fully support. To help local businesses grow, the Chamber is keen to promote the development of commercial space and in particular modern good quality light industrial and office space which we understand the airport development will provide.

In relation to the proposals around the A27, we would ask that any works at the Sussex Pad and the A27 be in close consultation to Chamber members, businesses and residents who will be directly affected. On the business side this would include Ricardo plc, Lancing College and other businesses located at Shoreham Airport, amongst others.

We are keen and understand it to be the case that access to and egress from the development will now be integrated with any Highways England scheme in respect of the improvements to the Worthing to Lancing section of the A27 generally, so that any negative effects on existing residents, businesses and the environment, particularly by traffic accessing the retail unit, are kept to a minimum.

As we understand it, revised plans also include a provision for pedestrians and cyclists to safely cross under the A27 from the southern side to the Combe Lane side which we very much support.

We would also wish that any planning gain provides real value to the whole community."

Summary of mixed support / comment / object

No. of representations: 23

- This development will help raise the profile of the area in light of the number of companies and businesses having left or due to leave the area. The proposal will help to revitalise and regenerate the area and make it an attractive place to live and work
- It will provide much needed investment opportunities and employment opportunities supporting a variety of skill levels
- Development will be a major enhancement for the area
- Demand for allotments in Lancing is high and this development, with small gardens, will adversely have an impact upon the population to availability ratio. The developers should consider allocating a site to meet the demand. Such a site should provide

adequate security, concrete paths and between plots, water provision and sheds to meet the Adur standards

- Support the application but object to the loss of pedestrian and cycling crossing of the A27 / Coombes Road
- Support the application provided that a suitable alternative route is provided for cyclists, pedestrians and other non-motorised users between the Old Shoreham toll bridge / Shoreham airport and Coombes Road
- Support the development but a small concern is access and egress from the development in terms of the A27 and A259
- Road system needs to be improved, a bypass is needed
- If it can be ensured that the right infrastructure (highways and otherwise) is provided alongside the development and that the statutory providers are content, then it should go ahead
- Support the principle of some development at this site comprising new homes and an element of employment use along with necessary community infrastructure. However, object to IKEA on the grounds of traffic, highways, visual impact as well as the type of employment offered
- Support many aspects of these plans but have significant concerns about IKEA and its impact on local traffic and on the setting of the National Park and on the historic Lancing College Estate. Also very concerned about the impact of the proposed works to the A27 on local vehicle traffic and on the safety of pedestrians, cyclists and horse riders
- The proposed works to the A27 need to be full co-ordinated and delivered by Highways England in order to ensure the plans provide a comprehensive improvement to this part of the strategic network
- IKEA needs to be supported by an appropriate landscaping scheme
- The proposals appear to meet the requirements of the Adur Local Plan
- Support the proposal of a new public outdoor nature space
- Would like to see more modern design in the buildings. We should be building houses for modern needs with interesting design that will inspire people
- Housing development needs good landscaping
- Pulse route should be extended with negotiation with local stakeholders
- Key workers housing may also be of benefit to attract key workers to the area
- What is the nature of the Country Park? Will this be a private estate with public access by permission or will it be under the Country Park principles with public access by rights (and a planning gain)?
- What happened to the old Right of Way between the railway bridge on Cecil Pashley Way across the common land (unmanaged) to Lancing Manor? If this was reinstated this would give a sustainable transport link between Shoreham Beach and Lancing Broadway to Lancing North and the Downs (Lancing Clump), not otherwise possible without a lengthy detour
- It is not clear whether there will be access from Hayley Road. If so, I object as this is a quiet residential area with many places where two cars cannot pass. If the only access is via the new A27 roundabout, then no objection. Would also not object if there was access via the private football training ground road
- Great design but object to adding yet another roundabout to our already beleaguered A27. If this development goes ahead, this is a prime opportunity to add a grade separated junction.

Relevant Legislation

The Council, in determining the planning application has the following main statutory duties to perform: -

- To have regard to the provisions of the development plan, so far as material to the application, any local finance considerations so far as material to the application, and other material considerations. (Section 70(2) Town & Country Planning Act 1990);
- To determine the application in accordance with the development plan unless other material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004);
- In considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990);
- To pay special attention to the desirability of preserving or enhancing the character or appearance of the Old Shoreham Conservation Area (S 72(1) Planning, Listed Buildings and Conservation Areas Act 1990);

The effect of the duties imposed by section 66(1) and 72(1) of the Planning (Listed buildings and Conservation Areas) Act 1990 is, respectively, to require decision-makers to give considerable weight and importance to the desirability of preserving the setting of listed buildings, and to the desirability of preserving or enhancing the character or appearance of a conservation area.

In addition,

- Section 11A(2) of the National Parks and Access to the Countryside Act 1949 and section 85 of the Countryside and Rights of Way Act 2000 require that 'in exercising or performing any functions in relation to, or so as to affect, land' in National Parks and Areas of Outstanding Natural Beauty, relevant authorities 'shall have regard' to their purposes.
- The Environment Act 1995 revised the original 1949 legislation and set out two statutory purposes for national parks in England and Wales:
 - **Conserve and enhance the natural beauty, wildlife and cultural heritage**
 - **Promote opportunities for the understanding and enjoyment of the special qualities of national parks by the public**
- When national parks carry out these purposes they also have the duty to:
- Seek to foster the economic and social well-being of local communities within the national parks.

This duty is particularly important to the delivery of the statutory purposes of protected areas. The duty applies to all local planning authorities, not just national park authorities. The duty is relevant in considering development proposals that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which might have an impact on the setting of, and implementation of, the statutory purposes of these protected areas.

There are a number of other duties placed on planning authorities regarding biodiversity enhancement and the countryside including:

Under section 40 of The Natural Environment and Rural Communities Act (NERC) 2006 local planning authorities (LPAs) must have regard to the purpose of conserving biodiversity, including restoring and enhancing species, populations and habitats, as well as protecting them.

Under the Wildlife and Countryside Act 1981, LPAs should take reasonable steps to further the conservation and enhancement of the flora, fauna or geological or physiographical features by reason of which the site is of special scientific interest (SSSI).

7. Relevant Planning Policies and Guidance

Adopted Adur District Local Plan 2017. In particular policies:

- Policy 1: The Presumption in Favour of Sustainable Development
- Policy 2: Spatial Strategy
- Policy 3: Housing Provision 20
- Policy 4: Planning for Economic Growth 25
- Policy 5: New Monks Farm, Lancing
- Policy 7: Shoreham Airport
- Policy 13: Adur's Countryside and Coast
- Policy 14: Local Green Gaps
- Policy 15: Quality of the Built Environment and Public Realm
- Policy 16: A Strategic Approach to the Historic Environment
- Policy 17: The Historic Environment
- Policy 18: Sustainable Design
- Policy 19: Decentralised Energy and Standalone Energy Schemes
- Policy 20: Housing Mix and Quality
- Policy 21: Affordable Housing
- Policy 22: Density
- Policy 23: Provision for Gypsies, Travellers and Travelling Showpeople
- Policy 24: Safeguarding Existing Gypsy, Traveller, and Travelling
- Policy 25: Protecting and Enhancing Existing Employment Sites and Premises
- Policy 27: Retail, Town Centres and Local Parades
- Policy 28: Transport and Connectivity
- Policy 29: Delivering Infrastructure
- Policy 30: Green Infrastructure
- Policy 31: Biodiversity
- Policy 32: Open Space, Recreation and Leisure
- Policy 33: Planning for Sustainable Communities

Policy 34: Pollution and Contamination
Policy 35: Water Quality and Protection
Policy 36: Flood Risk and Sustainable Drainage

National Planning Policy Framework (CLG 2012)

The National Planning Policy Framework (NPPF) sets out the overall framework of national planning policy, and is a material consideration in decisions on planning applications.

Paragraph 7 defines sustainable development. This includes sufficient land of the right type is available in the right places at the right time, providing the supply of housing required, high quality built environments, accessible local services and protecting and enhancing the natural and historic environment.

The NPPF states that the weight to be afforded to the document is that of guidance (para 13) and it does not change the status of the development plan (12). Paragraph 11 states 'Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.'

Paragraph 12 confirms the status of the NPPF by stating 'this National Planning Policy Framework does not change the statutory status of the development plan as the starting point for decision making. Proposed development that accords with an up-to-date Local Plan should be approved and proposed development that conflicts should be refused unless other material considerations indicate otherwise. It is highly desirable that local planning authorities should have an up-to-date plan in place.' Paragraph 14 confirms that, at the heart of the guidance is a presumption in favour of sustainable development. For decision-taking, this shall mean:

- approving development proposals that accord with the development plan without delay; and
- where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
 - specific policies in this Framework indicate development should be restricted.

Paragraph 17 defines 12 core planning principles. Paragraph 64 guides decision makers that permission should be refused for development of poor design that fails to take opportunities available for improving the character and quality of an area.

Section 11 - Conserving and enhancing the natural environment sets out the Government's commitment to enhancing the natural and local environment. Paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, geological conservation interests and soils
- recognising the wider benefits of ecosystem services
- minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures
- preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability
- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate

Paragraph 115 states that great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads².

When determining planning applications, Paragraph 118 states that LPAs should aim to conserve and enhance biodiversity by applying the following principles:

- if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused
- proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest
- development proposals where the primary objective is to conserve or enhance biodiversity should be permitted
- opportunities to incorporate biodiversity in and around developments should be encouraged;
- planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss; and
- the following wildlife sites should be given the same protection as European sites:
 - potential Special Protection Areas and possible Special Areas of Conservation
 - listed or proposed Ramsar sites³
 - sites identified, or required, as compensatory measures for adverse effects on European sites, potential special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites

Paragraph 123 states that Planning policies and decisions should aim to:

- avoid noise from giving rise to significant adverse impacts⁴ on health and quality of life as a result of new development
- mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions
- recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established⁵
- identify and protect areas of tranquility which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason

Paragraph 124. Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan.

Paragraph 125. By encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

Paragraph 128 requires applicants to describe the significance of any heritage assets affected, including any contribution made by their setting. It states that the level of details should be proportionate to the assets importance and should be sufficient to understand the potential impact of the proposal on their significance.

Paragraph 129 requires local planning authorities to identify and assess the particular significance of any heritage asset that may be affected by a proposal. This assessment should be taken into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservations and any aspect of the proposal.

When considering the impact of a proposed development on the significance of designated heritage assets, paragraph 132, states that "great weight should be given to the asset's conservation. The more important the asset the greater the weight should be". It guides us that a heritage asset's significance can be harmed or lost through development within its setting, and any harm or loss should require clear and convincing justification.

Paragraph 134 states that where a proposal will lead to less than substantial harm to the significance of a designated heritage asset, such harm should be weighed against the public benefits of the proposal, including its optimum viable use.

Paragraph 135 states that in weighing applications that directly impact on non-designated assets a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

8. Planning Assessment

The starting point for determination of this application is whether the scheme complies with the Development Plan and, if not, whether there are any other material considerations which would justify approving the development. In considering this application, it is important to highlight the legislative duties set out above with regard to the setting of the National Parks, listed buildings and Conservation Areas.

This is clearly a very controversial application in relation to a site that provoked the most objection through the Local Plan process. Many of the issues of concern were raised during the plan preparation and the Examination in Public. However, the inclusion of a large non-food retail store (IKEA) has increased the level of opposition from the local community. The timing of the application running in parallel with Highways England Consultation of the Road Investment Scheme (RIS) Improvement Scheme for Worthing to Lancing has heightened local concerns about traffic and air quality issues. The uncertainty about whether this improvement scheme will proceed or not has not helped in assessing the proposal.

Nevertheless, the Council has a duty to determine the application as submitted having regard to the responses of statutory consultees, letters of representation, national and local planning policies and the legislative framework referred to above.

The main considerations for determination are set out below and these form the report structure for assessing the scheme.

- **Principle of the Development**
 - Built up area boundary
 - Viability
 - Appropriate employment floorspace
 - Housing Need
 - Economic Benefits
 - Drainage and Ecology
 - Additional Pitches
 - Landscape and Country Park Implications
- **Design and Layout Considerations**
 - Non-Food Retail Store - IKEA
 - Residential
 - Highways and Accessibility
 - Air Quality
 - Noise and Vibration
 - Drainage and Ecology
 - Sustainability
 - Provision of supporting Infrastructure (s106)
- **Landscape Character and Visual Impact**
 - Impact on the Local Green Gap
 - Setting of the National Park

- Cumulative Impact
- Extent of mitigation
- **Impact on Heritage Assets**
 - Scheduled Ancient Monument – Dome Trainer
 - Listed Buildings
 - Non-Listed Buildings – Blister Hanger and Daniels Barn
 - Setting of Conservation Area – Pumping station
- **Planning Balance**
 - Do the public benefits outweigh the harm identified

Principle of Development

The site is allocated in the Adur Local Plan 2017 and the site was the subject of considerable discussion at last year's Examination in Public. The Planning Inspector recommended a number of modifications to the Plan and these have been incorporated into the policy, as set out below, to ensure a sound plan. The Inspectors comments on the allocation are also set out in **Appendix 2** as they provide a useful context for the amended policy and determination of the current planning application. Policy 5 relating to New Monks Farm, Lancing is set out below in full,

Land at New Monks Farm (as shown on the Policies Map) will be allocated for mixed use development comprising:

- *A minimum of 600 homes, 30% of which are to be affordable, providing a mix of types and tenures in accordance with identified needs.*
- *A community hub.*
- *1 hectare of land to accommodate a 1-form entry primary school, with additional land for expansion to 2-form entry in the future.*
- *A minimum of 10,000 sqm of appropriate employment-generating floorspace.*
- *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 sustainable modes of transport. (This should include a package of travel behaviour initiatives such as residential and workplace travel plans).*

The Withy Patch Gypsy and Travellers site should be relocated, to allow for the delivery of the new roundabout access onto the A27, and increased in size. The new site should be built at a higher level to reduce flood risk and to take the site out of Flood Zone 3. This will enable the provision of additional pitches in the future to meet identified needs.

The eastern boundary of the Built-Up Area at New Monks Farm as shown on the Policies Map is indicative. The final boundary will be determined at the planning application stage, having regard to landscape, drainage and viability considerations. However, any amendments to the boundary currently shown on the Policies Map must be based on a clear and convincing justification.

Improved access across the A27 to the South Downs National Park for pedestrians, cyclists and equestrians must be provided.

Developers will need to work with Adur District Council, West Sussex County Council and the Environment Agency to ensure that tidal and fluvial flooding as well as surface water and groundwater flooding are adequately mitigated without worsening flood risk elsewhere. 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 and must also set out a strategy for the long-term management and maintenance of drainage on the site.

As part of a Landscape Strategy/Green Infrastructure Strategy for the site, the following are to be delivered:

- Ecological enhancements in the north-west corner of the site in order to address the safeguarding and enhancement of biodiversity assets.*
- Retention and enhancement of the existing network of water bodies on site for drainage and ecological benefits.*
- Open space and recreation areas (to include children's play areas) located within the development, and provision for formal sports, in accordance with Council standards.*
- A Country Park and informal recreation (a minimum of 28 hectares).*
- Strategically sited areas of woodland to the north and east of the development area to provide a distinctive 'green edge', screening views of the new development.*

A number of assessments will also be required at the planning application stage. These 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.*
- A site wide landscape and ecological management plan that is informed by up to date ecological information to be produced and implemented to the satisfaction of the local planning authority to ensure the long-term maintenance of retained and newly created on- site habitats.*

Appropriate mitigation of any issues raised through these assessments is to be delivered. The development of this site, the location and layout of built development, green infrastructure and other landscaping is to be based on the following principles and site-specific requirements:

- Development must respect the landscape of the surrounding countryside and the South Downs National Park.*
- Affordable housing is to be distributed throughout the development.*

- *The development is to be connected to sewerage and water distribution networks at the nearest points of adequate capacity, as agreed with Southern Water.*

The planning application meets the key requirements of the above policy in respect of the provision of a minimum of 600 dwellings (30% affordable), a relocated and extended Withy Patch Gypsy and Traveller site, delivery of a new roundabout to facilitate both the development and commercial development at the airport, a Country Park (although not a minimum of 28 hectares), land for a school (with scope for expansion) and an acceptable foul and surface water drainage strategy.

Whilst, these matters are addressed in detail later in the report, the principle of the development revolves around an assessment of the acceptability of the proposed employment floorspace. This aspect of the proposal has provoked the most criticism from the local community and has an impact on compliance with other aspects of the above Development Plan policy. However, it could also fundamentally affect the delivery of the Plan's housing and employment provision which will need to be weighed up against any identified harm as part of the assessment process.

Built Up Area Boundary

As the Policy 5 identifies, the built-up area boundary is indicative on the Proposals Map as the precise layout of the development had not been fixed during the preparation of the Plan. It is also relevant to note that there was no fixed landscape feature that provided a defined edge to the strategic allocation however it was heavily influenced by the Council's landscape evidence. This is reflected in the Local Plan Inspectors letter where he states that it would 'allow the precise boundary to be drawn up once all the detailed drainage and landscape assessments have been undertaken' and would enable a level of '*flexibility to be adopted*'. Importantly the Inspector recognised that viability would be a factor in determining the final boundary but that any amendment to the indicative built up area would require clear and convincing justification.

The extent to which the current proposal extends beyond the indicative boundary is indicated on the plan attached as **Appendix 3**. This Plan identifies two residential parcels, the car park for the non-food retail unit and the two additional football pitches proposed for the B&HAFC training ground. As stated by the Inspector key considerations for the built-up area boundary relate to viability, drainage and landscape.

Viability

A key issue is one of viability and this was identified during the preparation of the Local Plan and the supporting evidence, in particular the Whole Plan Viability report commissioned by the Council. This identified that the infrastructure costs necessary for the strategic housing allocation were significant and as a result the development could not generate sufficient development value to meet any Community Infrastructure Levy (CIL). Furthermore, the supporting viability appraisals identified that only a limited development profit of 5% would be achieved (well below any normal commercial return). In view of the concerns about the viability of this strategic allocation the Council sought and provisionally secured Local Growth Funding of £5.7 million to help deliver the new A27 junction. Only 60% of the funding bid was provisionally allocated (£5.7 million).

The Local Plan Inspector in light of the Councils shortfall in housing and employment land and the above viability concerns amended the plan to specifically refer to a minimum of 600 dwellings and a minimum of 10,000 sqm commenting that,

'This more flexible approach is justified in order to ensure that the most effective use of land is achieved and therefore MM8 is recommended. In terms of the commercial floorspace the introduction of a degree of flexibility into the policy will enable consideration of all the elements of any proposal to be undertaken in a comprehensive way, taking into account issues of viability.'

In support of the planning application a Viability Statement has been submitted which indicates that the Whole Plan Viability appraisal undertaken for the Local Plan did not take into account the cost of purchasing the land or the full cost of the infrastructure needed to make the site accessible. As a result, it is submitted that when these factors are properly taken into account the appraisal shows a very substantial shortfall which is commercially unviable. The applicant has submitted viability appraisals to demonstrate that 10,000 sqm is unviable and that even with a threefold increase in floorspace (proposed IKEA), viability is marginal even with the public subsidy secured through the Local Growth Fund bid. The following summary table has been submitted by the applicants to demonstrate the funding gap with the Local Plan allocation:

Policy Compliant Scheme - 10,000 sqm Employment Space and 75%:25% Affordable Housing Mix (With LGF Funding)

| | |
|---|----------------|
| NMF Costs incl land 000's | £58,670 |
| Total Funding Cost | £13,968 |
| NMF Development Costs including Funding | £72,638 |
| Total Income | £59,692 |
| Profit/Loss | -£12,946 |
| Expected Developers Profit 20% on Costs | £14,528 |
| Funding Gap | £27,474 |

In connection with the submitted scheme the applicants submits that there would still be a funding gap of £8 million assuming a 20% profit return as set out below:

Submitted Scheme (With LGF Funding)

| | |
|---------------------------------|---------|
| NMF Costs incl land 000's | £62,732 |
| NMF Funding | £8,331 |
| NMF Development Costs | £71,063 |
| Total Income | £77,271 |
| Profit/Loss | £6,208 |
| %age Developers Profit on Costs | 8.74% |

Expected Developers Profit 20% on Costs

£14,213

Funding Gap

£8,005

To robustly test the submitted appraisals the Council has employed nationally renowned cost consultants, Gleeds to review the construction costs particularly relating to the infrastructure necessary to unlock the housing development and commercial development at the airport. The applicants agreed to work on an open book approach with the Council and shared both confidential information related to the land deals with Cala Homes and IKEA as well as results of tenders completed for the infrastructure works.

The fact that 40% of the overall project has been out for competitive tender provides far greater certainty on the developer's costs than would normally be the case in reviewing the viability of a planning application. It is also relevant to note that the Capital to Coast LEP has also reviewed the viability case in resolving to provisionally allocate public funding to the project and this should provide further comfort to Members that the viability case submitted by the applicant is robust.

It is worth reiterating that the developer in this case, New Monks Farm Ltd, a subsidiary of Brighton and Hove Albion FC, is delivering all the infrastructure to unlock both the housing land and commercial development at the airport. It is submitted that this long-term interest will secure future management of the drainage solution (including the pumping station) and public open space (Country Park). The viability issues to address are therefore:

- 1) Would the Local Plan allocation deliver a viable development able to meet the high infrastructure costs? This includes an assessment of the land deal secured with Carla Homes.
- 2) Is the applicant's viability assessment of the infrastructure costs accurate
- 3) Given the high infrastructure costs is the non-food retail store and Local Growth Funding essential to ensure the delivery of the housing and commercial development at the airport?

1) Viability of the Local Plan Allocation

As indicated by the evidence submitted to the Local Plan, viability was an issue and it was accepted that a public subsidy would be required. However, your Officers accept that there has been a significant increase in infrastructure costs. The applicant has indicated that the overall infrastructure cost for the project is circa £46 million and after reviewing the viability of the allocation for 10,000 sqm it is clear that it would not generate sufficient value to contribute to the necessary infrastructure costs.

Commercial

To test the likely return for 10,000 sqm of traditional employment use (B1 or B8 warehousing scheme the applicants submitted a financial appraisal by a commercial

developer experienced in building out employment sites. The summary appraisal is attached as **Appendix 4**.

In response, the Councils Consultant commented that,

The indicative rental rates were prepared in February 2017 and have not been adjusted to February 2018. We have reviewed the rates and yields provided with local commercial property specialists and they have expressed their concern that rent of £9.50/ft² included within the Development Appraisals is high in the current market. They have advised that recent regional evidence in Southampton would suggest that a rental level, based on net affective rents, these projects could provide a rental level of circa £8.25/ft². If the anticipated rental values are not realised, this would result in [REDACTED] receiving a reduced level of profit.

Balanced against this Gleeds commented that build costs were slightly higher and they felt that more information on land value, planning and legal costs would assist a more robust review. However, the appraisal related to an alternative development scenario rather than a specific development proposal and it was accepted that the information provided a basis for considering the overall viability of the Local Plan

Residential

In assessing the viability of the residential component of the scheme, the Council's Consultants reviewed Cala's development appraisal and concluded that,

Developer profit

It is difficult to accurately assess the exact levels of developers profit when the construction period is over a long period of time especially with several other potential impacts not only on construction costs but expected sales prices e.g. Brexit, change of rental/shared ownership spilt. On the information Cala provided and what Gleeds believe to be a sensible % return, we would conclude that Cala have a market level rate of return applied to this development that would meet their expectations

Gleeds conclude that they were,

'given transparency over Cala's development appraisal and given sight of detailed information and correspondence to support the figures provided within their development appraisal. Gleeds undertook an independent review of expected sales values, building costs, fees and marketing costs, and can advise that we believe Cala's development appraisal to be in line with expected construction costs, market sales values and expected developers profit return.

The issue of the amount of rented affordable delivered by the scheme and other infrastructure costs is addressed below.

2) Infrastructure Costs

Mott MacDonald working for the applicants have submitted detailed spreadsheets indicating the individual costs for different aspects of the project and over several months have been talking to the Councils Consultants to agree the viability appraisals and review tender packages as they have been submitted.

On the overall construction costs for the infrastructure works Gleeds original assessment considered that some of the budget book costs were too high and indicated that the overall costs should be reduced by approximately £1.8 million. Following receipt of further information from the applicants, Gleeds have reviewed the proposed reductions and this figure has now been reduced to approximately £135k. On Infrastructure costs the Councils Consultants conclude that,

'Gleeds sought a number of clarifications and breakdowns to the allowances within the MM budget book and have rejected certain allowances where we believe the allowances to be unreasonable or covered elsewhere within the budget book. MM have provided adequate responses to all of the reductions previously recommended by Gleeds, and where the additional information has been accepted the omissions have been removed or adjusted where not all supporting information could be provided.'

'Gleeds understand that due the nature and scope of the project, budgetary allowances are difficult to accurately price without design details and there is a large element of risk associated with this project.'

Gleeds indicate that to analyse the infrastructure costs in more detail they would need to review all the tender packages for the works, have a greater breakdown of some of the costs in sqm and a review of sub-contractor measures and quotes. However, as indicated previously the Council and its Consultants have received far more information on actual build costs than would be normally the case and the information provided to date gives a robust review of likely infrastructure costs. Of significance is Gleeds statement about the risks associated with such a large project.

Given the costs of infrastructure and the return from residential and the likely return for 10,000sqm of employment space Gleeds accept that the overall position demonstrates that the Local Plan allocation was not viable even with the Local Growth Funding in place. Gleeds conclude that,

'On a project of this size and the level of risk associated with it, Gleeds would expect to see a developer's return of approximately 20%, even with the Local Growth Fund the policy compliant scheme is not commercially viable and results in a loss for the applicant. Based on a 20% developer's profit margin there is a funding gap of over £27 million on this scheme, it is worth noting that this figure does not include any deductions to the employable space profits as Gleeds recommend within section 4.1 of this report.'

The size of the funding gap at £27 million is significant and even if an alternative use rather than a traditional employment use was found, the conclusion of the Councils Viability Consultant clearly demonstrates that the Local Plan, even with a public subsidy is not viable or deliverable. It should also be noted that the appraisal assumed that s106

costs would be £3.5 million but the County Council (in line with the Infrastructure Delivery Plan IDP) has also requested a financial contribution for the construction of the new school as well as land which has not be factored into the appraisal and therefore would make the viability position even worse.

3) How essential is the non-food retail store and LGF to scheme viability?

To review the importance of the non-food retail store it is important to assess the nature of the land deal with IKEA and whether any alternative land use/occupier would have provided a better financial return.

IKEA

As the applicants have advised Gleeds that there is only one potential end user that showed interest in the land, the Council's Consultant has commented that it would be difficult to ascertain whether the deal represented good value for money as there are no other bids/tenders to compare against or comment on expected profit returns would be against sales value. Nevertheless, Gleeds accept that the deal is considerably higher than expected returns of commercial units. Gleeds, therefore, recommended advice from a Chartered Land Surveyor in relation to the alternative land use value and an assessment of the IKEA land deal.

To assess the IKEA deal, the Council has sought advice from national property agents, Savills. Due to the sensitive nature of the information required to evidence IKEA's expected profit returns it is anticipated that this information would be unlikely to be made available to a third party for inclusion in a viability report. However, Savills have provided a clear update on the current state of the retail warehouse market.

Savills comment that the sector has been hit hard in the last few months off the back of a number of companies failing (Carpentright, Mothercare, Homebase etc). As a result, the market has been flooded with space and values (land and rentals) are falling. Only the discount sector (Aldi/Lidl and The Range etc) are still taking space but they cannot pay excessive rents and hence land values for retail warehousing are low as build costs keep rising. To get any multi-let retail scheme off the ground Savills suggest it would need 3 or 4 retailers to be interested but to get the equivalent floorspace and land value would be impossible in the market as there are not enough retailers requiring that level of floorspace.

The advice concludes that the applicants deal sounds as if they are in a market of 1 and that it is a *'pretty strong deal from a solvent retailer which could not be repeated in the current market.'* In the circumstances your Officers are satisfied that the IKEA deal is the best employment use that could be secured on the site and significantly exceeds any other employment use currently available in the market.

The review of the viability of the current proposal has demonstrated that both the IKEA and residential land deals are robust and very competitive in the current market. The infrastructure costs are clearly very significant and even with LGF funding there is a funding gap. Given the risks associated with a development of this size the Council's Consultant considers that 20% is a reasonable expectation for the developer New Monks Farm Ltd., however the viability review has demonstrated a low % return of just 8.74%.

The Councils Consultants overall assessment of the current scheme viability is set out below:

'Gleeds can advise that after assessing all the information that has been provided for the Infrastructure costs, the deal with Cala Homes and the agreement with IKEA, even with LGF funding, the expected returns for the developer for this project is significantly lower than could be expected for a project of this scale. Gleeds further conclude that this scheme would certainly not be viable without LGF funding as the developers return on profit would be negligible, if anything.'

As a result, your Officers accept that the IKEA store and a public subsidy via the Local Growth Fund is essential to deliver the proposed strategic allocation.

Affordable Housing and Development Contributions

The above assessment has been undertaken assuming 60% rented accommodation rather than the 80% indicated as a preference in the adopted Local Plan. As mentioned before the applicants had also not accounted for an education contribution. The impact of the affordable housing has been also reviewed with the applicants and they have indicated that this would increase the funding gap by circa £ 1 million as set out below;

Scheme With IKEA, and 75%:25% Affordable Housing Mix (With LGF Funding)

| | |
|---|----------------|
| NMF Costs including land 000's | £63,380 |
| NMF Funding | £8,661 |
| <hr/> | |
| NMF Development Costs | £72,041 |
| Total Income | £77,271 |
| Profit/Loss | £5,230 |
| %age Developers Profit on Costs | 7.26% |
| Expected Developers Profit 20% on Costs | £14,408.20 |

| | |
|--------------------|---------------|
| Funding Gap | £9,178 |
|--------------------|---------------|

Gleeds comment on the reduction in developers profit to 7% is set out below:

Although this scheme appears to provide a profit for the developer it is significantly lower than would be expected. Based on the figures provided NMF Development Ltd can expect a return of approximately 7%, considering the amount of risk and expected duration of this project this is a level that would deter most developers from undertaking this development.

This % profit would be lower if the s106 costs increase as a result of the requested education contribution.

In view of the affordable housing need in the District it would be important to review scheme viability and a claw back mechanism can be included in the s106 agreement to

determine whether additional rented units could be delivered in later phases of the development. However, given the above financial appraisal it is highly unlikely that the percentage profit margins would increase beyond that predicted particularly given the risks associated with a project of this scale.

The impact of the above viability assessment is significant and a material planning consideration in determining whether there is a justification for extending beyond the indicative boundary line. The assessment has also some far-reaching implications for the delivery of the Local Plan.

Of significance is the fact that a joint access and drainage strategy is being promoted and that the scheme is helping to unlock the commercial development at the airport. The infrastructure costs include approximately £6 million contribution towards providing an access and drainage solution to help bring forward the employment allocation at the airport. The viability assessment highlights the lack of value generated for B1/B8 employment development to pay for significant infrastructure costs and the wider employment benefits were recognised by the LEP in providing Local Growth Funding.

Whilst IKEA appears to be the only viable employment use to help deliver the necessary infrastructure works it is necessary to assess whether it is an 'appropriate employment use' and in principle whether it complies with other national and local planning policies.

Appropriate Employment Space.

The need for some degree of flexibility in the wording of Policy 5 was also discussed at the EiP in relation to the allocation of 10,000 sqm of 'appropriate' employment floorspace. The Inspector was clear that a 'minimum' requirement was justified *'in order to ensure that the most effective use of land is achieved'* and he commented that, *'the introduction of a degree of flexibility into the policy will enable consideration of all the elements of any proposal to be undertaken in a comprehensive way, taking into account issues of viability.'*

The Inspector also commented that, *"There is no reason to conclude that the floorspace figure would be significantly exceeded because policy 5 still requires the provision of a country park (at least 28ha), the implementation of a landscape strategy and the provision of green infrastructure."*

The commercial use was not specifically restricted to traditional employment uses (B1, B2 and B8) use classes, as for example the allocation at Shoreham Airport. This reflected the location adjacent to the A27 and the viability concerns during Plan preparation.

The government has recognised that the retail sector is an important employer and falls within the general definition of an employment generating use. In this respect, the Local Plan acknowledges that employment generating uses, such as retail, make a significant contribution to the economy. The applicants have referred to a report undertaken by the Department of Business Innovation and Skills (BIS) now Department of Business, Energy & Industrial Strategy (BEIS) entitled Retail Sector Overview April 2013 which indicates that around £71 billion in gross value added (GVA), representing around 5% of the total of the UK economy (BIS). Retail is comparatively more labour intensive than other sectors of the UK economy. In 2016 BIS reported that there were over 3 million jobs in the retail sector.

The proposed IKEA store would clearly generate far more jobs than the Local Plan allocation. In total the applicants submit that the proposal would create 430 gross full-time and part-time jobs, and therefore fully complies with Policy 5 of the Local Plan. It is accepted that retail jobs are particularly beneficial for target groups that can otherwise suffer exclusion from labour markets and experience significant economic deprivation. Retail is an especially important source of employment for young people and school leavers, particularly those who leave school with few formal qualifications. Of the 430 jobs 60% are to be part-time and 40% full time (an equivalent of 336 gross FTE jobs).

Although concerns have been expressed that the retail use would not address the shortage of employment floorspace in the District, there are significant employment benefits given the location of the site adjacent to Mash Barn Ward where there is a higher rate of unemployment than the rest of the District and the Ward is in the 20% most deprived in terms of income and education and skills (2015 – Indices of Multiple Deprivation).

| | Adur | Mash Barn |
|--|-------------|------------------|
| <i>% of People Income Deprived</i> | 12.0% | 15.1% |
| <i>% of Working Age People</i> | | |
| <i>Employment Deprived</i> | 8.4% | 9.6% |
| <i>% of Children in Income Deprived</i> | | |
| <i>Households</i> | 17.1% | 20.1% |
| <i>% of Older People Income Deprived</i> | 15.1% | 22.5% |

Given these statistics, it is highly relevant that IKEA is a Living Wage employer (currently £8.75 outside of London compared to the minimum wage of £7.50). It is also relevant that IKEA has a very good record of employing locally and training apprentices. IKEA states that in two of its recently opened stores,

- 90-95% of ‘co-workers’ (not management) have come from the immediate post codes
- 60-65% of managers have come from immediate post codes - this percentage is lower as they move experienced and specialist managers into stores from other stores as this provides a development route and ensures that they retain their brand values and approach
- Recruitment would be undertaken by working with local agencies and organisations including community groups. IKEA has a flexible approach to how they recruit, which focuses on identifying potential and commitment as opposed to a focus on existing experience and/or formal qualifications.

Education attainment and the lack of skills generally with the District has been an issue for some years and is highlighted in the ES. Qualification levels in Adur are much lower than the rest of the sub-region. In 2011, a quarter of all adults in Adur (26%) had no qualifications compared to West Sussex (20%) and Greater Brighton (18%). Whilst, a number of objectors have referred to the low paid and low skilled nature of any jobs

generated by the new store, this is not reflected in the range of jobs on offer and the potential salaries and training opportunities.

In employment terms, in addition to the 430 full and part-time jobs the Socio-Economic Chapter of the ES states that there could be a further 40 indirect full-time jobs in the local economy associated with the proposed new store.

Of course, added to these employment numbers would be those involved with the various construction projects on the site and the ES indicates that the total jobs created could amount to 876 (including 332 construction jobs and 114 indirect jobs). The applicants have agreed to include clauses in any legal agreement to encourage the use of local construction firms and to ensure a minimum level of apprentices are employed during the construction phase of the development.

Whilst, a retail use is recognised as an employment generating use and the employment offered would make a significant contribution to meeting local employment needs, its location outside of an existing town centre would potentially conflict with other policies of the Plan (policy 27) and the NPPF and would need separate assessment and justification.

The NPPF reflects planning advice that has been around for many years i.e. planning authorities should adopt a 'town centre first' approach in plan making and decision making. In this respect, the NPPF urges planning authorities to plan positively, to support town centres to generate local employment, promote beneficial competition within and between town centres, and create attractive, diverse places where people want to live, visit and work.

The NPPF sets out 2 key tests that should be applied when planning for town centre uses which are not in an existing town centre and which are not in accordance with an up to date Local Plan – the sequential test and the impact test. These are relevant in determining individual decisions.

The sequential test should be considered first as this may identify that there are preferable sites in town centres for accommodating main town centre uses (and therefore avoid the need to undertake the impact test). The sequential test will identify development that cannot be located in town centres, and which would then be subject to the impact test. The impact test determines whether there would be likely significant adverse impacts of locating main town centre development outside of existing town centres (and therefore whether the proposal should be refused in line with policy).

To assist the Council in assessing the submitted Retail Impact Assessment, in support of the planning application a retail Planning Consultant was appointed. The Consultant had recently prepared the Retail Study for Worthing and therefore knew a number of the sequential sites in the area and had a good understanding of the existing town centres. A number of detailed queries were raised in relation to the original Retail Assessment by our Consultant and these were addressed in the applicants Addendum to the original report.

Sequential Test

The sequential site assessment set out in DWD's original retail assessment focused solely on the IKEA warehouse business model, considering sites which were over 5 ha in size and within a 10-minute drive time of the application site. Whilst it was agreed that there were no sites of this size within Adur two further sites were assessed - Brighton Marina and Churchill Square (Brighton) but were discounted as being not suitable or available alternatives for the proposal.

The Councils Retail Consultant, however, did express concern that the applicant had not met the requirements of the sequential site assessment in considering alternative smaller store formats. These concerns were also highlighted by the Planning Consultant employed by Lancing College. In the original Retail Assessment, the applicants Consultants had not demonstrated flexibility in terms of format and scale, and whilst case law encourages the recognition of business models, a more recent Mansfield case confirmed that the sequential approach should require flexibility based on the broad type of development and range of goods proposed, rather than an individual retailer's corporate requirements. Despite IKEA opening smaller format stores, the Retail Assessment had focused the sequential site assessment solely on their larger retail warehouse format.

To highlight the Companies changed approach in October, last year IKEA announced that it planned to test 'open source' design and full-range town centre showrooms as part of its efforts to adapt to changing consumer habits. The Chief Executive said that he was,

'fine-tuning its city-centre store concept, developing a format to display its entire range but in a smaller space with the help of new digital tools such as virtual reality. The new stores would also not need parking lots or large inventories thanks to expanded home delivery services and that this (format) would come within the next few years'

In this context, the applicant was requested to provide further discussion around the different types of IKEA business model and the locational requirements of each format. The applicant was requested to demonstrate sufficient flexibility in terms of format and scale, and a related consideration of alternative suitable sites to accommodate the broad type of development being proposed across the Search area.

In the Addendum Retail report, the applicants Retail Consultant focuses, in the first instance, on the larger retail warehouse format and catchment opportunity. They reiterate IKEA's requirement for their traditional warehouse format store in this location in order to ensure sufficient floorspace to display the products in an assembled state alongside a self-serve warehouse. It is submitted that the catchment area around Brighton and Lancing has been identified as a gap for the traditional IKEA store format for several years, and it is stressed that there is no alternative IKEA representation within a 1 hour drive time – the closest stores being Southampton (1hr 30mins), Reading (1hr 45mins), Croydon (1hr 10mins) and Lakeside (1hr 17mins).

The applicants Retail Consultant submits that IKEA does not wish to operate alternative store formats in this location at the present time, instead wanting to focus on bridging the clearly identified gap in their traditional store format within this catchment area. In this

respect, it is also submitted that the smaller format stores are viewed by the business as being complementary to the traditional warehouse format which remains central to their business portfolio.

Nevertheless, the Addendum retail report does provide a further assessment in respect of demonstrating flexibility to accommodate a smaller format store on a more constrained site. They have reduced the minimum size of the site to 2 ha and included higher order centres within a larger catchment area – Littlehampton, Worthing, Shoreham-by-Sea, Southwick, Haywards Heath, Burgess Hill, Lewes, Brighton & Hove. However, the report concludes that they were unable to find any sites that were 2 ha within the network of town centres that are suitable and also available for the development proposed.

As the applicant has been able to demonstrate that IKEA has a gap in representation in this catchment area, and that it is not seeking representation of alternative store formats in this area at the current time the Councils Retail Consultant has indicated that she is satisfied that the sequential test has been met. In this respect, and consistent with recent case law, the Councils Retail Consultant concludes that the commercial requirements of the IKEA 'business model' should be acknowledged and taken into consideration when concluding on the sequential test, particularly given their long-standing site search and substantial gap in representation in this area. The Councils Consultant states that,

'In conclusion, we attach some weight to recognising the requirement for the traditional format IKEA business model within this catchment area and concur that there are no available, suitable - smaller - sites to accommodate the retail element of the proposed development. Even when applying a reasonable degree of flexibility, the analysis has robustly demonstrated the absence of available, suitable sites within a more widely drawn catchment area.'

Impact Test

Following various clarifications on turnovers, market share and trade diversion the Addendum Retail report provides an update on the likely trade draw and retail impact on existing centres. The following extract from the table identifies the quantitative retail impact on nearby centres (the longer list in the Addendum considers centres further afield to Crawley and Hastings).

| Centre/Facility | DT Catchment | Turnover 2017 | Turnover 2023 | IKEA Trade Draw | IKEA Trade Draw | 2023 Impact |
|-----------------|--------------|------------------|------------------|-----------------------|--------------------|-------------|
| | | | | % | £ | |
| Brighton | 30 | 950.23 | 1084.55 | 15.0% | 12.18 | 1.12% |
| Hove | 30 | 102.73 | 117.25 | 2.0% | 1.62 | 1.39% |
| London Road | 30 | / | / | 0.0% | 0.00 | 0.00% |
| Shoreham-by-Sea | 30 | 27.51 | 31.40 | 0.0% | 0.00 | 0.00% |
| Southwick | 30 | 8.71 | 9.94 | 0.0% | 0.00 | 0.00% |
| Lancing | 30 | 29.51 | 33.68 | 0.0% | 0.00 | 0.00% |
| Worthing | 30 | 293.00 | 334.42 | 5.0% | 4.06 | 1.21% |
| Bognor Regis | 30 | 63.39 | 72.36 | 1.0% | 0.81 | 1.12% |
| Littlehampton | 30 | 23.84 | 27.21 | 0.0% | 0.00 | 0.00% |
| Chichester | 30 | 295.39 | 337.15 | 2.0% | 1.62 | 0.48% |
| Farnham | >60 | 134.24 | 153.21 | 0.0% | 0.00 | 0.00% |
| Godalming | 60 | 44.01 | 50.24 | 0.0% | 0.00 | 0.00% |
| Haslemere | 45 | 27.98 | 31.94 | 0.0% | 0.00 | 0.00% |
| Cranleigh | 45 | 32.40 | 36.97 | 0.0% | 0.00 | 0.00% |
| Horsham | 30 | 555.00 | 633.46 | 5.0% | 4.06 | 0.64% |
| Burgess Hill | 30 | 119.56 | 136.46 | 1.0% | 0.81 | 0.60% |
| East Grinstead | 45 | 100.53 | 114.74 | 0.5% | 0.41 | 0.35% |
| Haywards Heath | 30 | 96.95 | 110.65 | 1.0% | 0.81 | 0.73% |
| Lewes | 30 | 70.94 | 80.97 | 0.5% | 0.41 | 0.50% |
| Crawley | 45 | 480.37 | 548.27 | 5.0% | 4.06 | 0.74% |

Whilst the above table indicates that the biggest impact on comparison goods turnover would be on Brighton/ Hove and Worthing the actual percentage impact is low at below 1.5 % and all other destinations the impact is less than 1%.

The applicants Retail Consultant was also requested to undertake sensitivity testing on the trade draw assumptions. Effectively reducing trade draw from one centre (Brighton) and assessing the impact on others. The Addendum report assessed this impact and identifies limited levels of impact of no more than 3.64% on Worthing town centre. The analysis demonstrates that the IKEA store is, in quantitative terms, unlikely to have a significant adverse impact on the network of town centres across the catchment area.

The Councils Retail Consultant also requested additional sensitivity testing, uplifting the proposed IKEA's trade draw to 20% from Brighton and Worthing respectively as these have a stronger representation from 'IKEA type goods'. Whilst, this tested a worst-case scenario the analysis demonstrates an impact of 1.5% on Brighton and 4.9% on Worthing, which is considered low and not significant given their scale and higher order shopping function. Even if trade diversion was increased to 30% on each centre, impact would rise to only 3.0% and 7.3% respectively. In this context, the Councils Retail Consultant is confident that the sensitivity test is robust, demonstrating that – in quantitative terms – the proposals will not have a significant adverse impact on the network of town centres in the identified catchment area.

The Addendum report also considers the cumulative impact of the development with other planned retail developments in the area but given the geographical distribution of various

sites with planning permission (including Crawley, Guildford, Rustington and Chichester) and the large IKEA catchment area the model demonstrates an almost negligible cumulative impact on the large network of town centres within the catchment area. The Councils Retail Consultant, therefore, concurs with the applicants Retail Consultant that trade diversion will impact on relatively few centres, and the scale of additional trade diversion is minimal.

In addition to cumulative impacts, it is necessary to consider whether approving an IKEA store of this scale might have a significant adverse impact on 'existing, committed and planned' public and private investment in nearby town centres, if so this could be grounds for refusal depending on the scale of impact. The original Retail Assessment looked at a range of investment sites across 13 town centres. Looking specifically at those centres where the highest proportion of trade diversion is predicted, they reviewed the town centre investment opportunities within 7 town centres in more detail – Brighton, Hove, Bognor Regis, Horsham, Worthing, Burgess Hill and Crawley. With the exception of Churchill Square (Brighton) and the Martlets Centre (Burgess Hill), the identified opportunity sites appear likely to accommodate mixed-use developments rather than being solely given over to retail floorspace. It is accepted there that none of the sites considered appeared to be seeking to promote the type of development being proposed by the application scheme, meaning that the scope for a 'significant adverse' impact arising against planned investment is likely to be limited. It is unlikely that investment would be withdrawn in any centre as a consequence of the proposals for an IKEA retail store.

The applicants Retail Consultant was requested to review the sites including those identified in the Worthing Town Centre Investment Prospectus, and any 'existing' schemes that might be under construction but the Addendum concluded that the development proposed would not impact on town centre investments sites. Whilst the Councils retail consultant had some concerns about the Union Place site in Worthing your Officers are aware that this has been identified as a mixed-use development possibly incorporating leisure uses. Nevertheless, the Councils Retail Consultant considers that the,

'assessment presented is robust and thorough, and we conclude there are no investment opportunity sites significantly at risk from the proposed IKEA retail store.'

Overall it is considered that the proposed IKEA store complies with the tests set out in the NPPF. In retail terms, the proposed IKEA would not cause any significant adverse impact on the network of town centres in the catchment area and that the applicant has complied with and satisfied the sequential test.

Given the flexible approach towards the definition of employment generating uses and compliance with the sequential and impact test, the principle of retail use could be considered acceptable as an 'appropriate use'. However, this does not take into account other issues such as transport and landscape impacts (as well as all the other detailed scheme assessments).

Housing Need

As indicated earlier the housing areas encroach into the Local Green Gap with 47 dwellings beyond the indicative built up area. The justification given for this relates to

The need to meet the minimum requirement of 600 dwellings set out in the Local Plan and on the basis that,

'the site illustrative masterplan submitted with the outline application has been informed by the physical constraints which the site presents and conceived on an informal grid which has been interlaced with the green framework of the retained watercourses forming drainage swales within the new layout. The eastern edge of the development has been defined by the existing watercourse and the western edge of the proposed Country Park.'

In view of the viability issues there are considerable concerns that without the proposed IKEA one of the two strategic housing sites will not come forward, undermining the Districts housing delivery and potentially affect the Councils ability to meet a 5-year supply of housing. Certainly, any reduction in numbers to address concerns about the extension beyond the indicative built up area would affect the current scheme viability.

As Members are aware, the Objectively Assessed (Housing) Need (OAN) for the District is 6,825 and the Local Plan Inspector accepted that the constraints of the District were such that this could not be met. The Local Plan proposes a minimum of 3,718 dwellings over the plan period (177 dwellings per year). The delivery of New Monks Farm is, therefore, a critical part of Adur District Council's total housing supply over the plan period.

The NPPF also requires Local Planning Authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with a buffer of 5% (moved forward from later in the plan period) to ensure choice and competition. If a 5 year supply of land cannot be identified, the national presumption in favour of sustainable development is applied when determining planning applications.

In calculating the five year housing land supply for the period 2018 - 2023, based on the delivery of 177 dpa, it can be demonstrated that Adur currently has a 5.2 year supply of deliverable sites without relying on development at New Monks Farm. Therefore, whilst development at New Monks Farm is crucial to delivering the overall strategy of the Local Plan, it is not necessary for the first phase of 249 dwellings to be completed within five years. However, the five year housing land supply calculation (which uses the standard methodology) assumes that the identified supply of sites (including 630 at Shoreham Harbour (Free Wharf and part of Kingston Wharf) will all deliver as predicted in the housing trajectory.

Adur has a surplus of just 75 dwellings (in terms of a 5 year supply of sites) and if just one of the larger sites does not deliver within these timescales, without the early delivery of New Monks Farm the Council may not have a five year housing land supply which could potentially make the Council vulnerable at appeal in connection with other non-allocated sites. Whilst, Free Wharf has a resolution to grant permission (subject to a s106 agreement) Members will be aware that this development is dependent on grant funding and no application has come forward, as yet, on the Kingston Wharf site.

Affordable Housing

Of significance is the acute lack of affordable housing in the District. With the Councils waiting list approaching 1,000 households and developments at Shoreham Harbour providing only limited numbers of rented accommodation on the grounds of viability, there is an urgent need for greenfield sites to deliver the full 30% affordable housing with an emphasis on rented accommodation. The scheme would provide 108 affordable rented homes (60%) and 72 intermediate homes and as the Head of Housing indicates with current Local Housing Allowances (LHA) rates it is likely that affordable rents would be lower than 80% of current market rents. The development would therefore make a significant contribution to those in housing need within the District.

Given the lack of affordable housing in the District, your Officers have spent some time discussing with Carla Homes the scope to increase the level of affordable rented apartments. However, to achieve this it is clear that the viability position is such that this could only be achieved by reducing the overall percentage of affordable housing to 25%. This would result in the loss of 30 affordable homes.

This is not considered acceptable and your Officers have, therefore, negotiated other options to maximize the benefits to the local community. The applicant has confirmed that first nomination rights will be given to those on Adur's Housing Register for all affordable rented homes. In addition, Carla Homes has agreed a reasonable endeavours clause in the S106 agreement to offer a one month period of exclusive marketing on all intermediate/shared ownership properties to people with a local connection to Adur District (Members will be aware that normally there is no geographical restriction on who can occupy these homes).

Gypsies and Travellers

A Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (GTAA) was undertaken in 2013 with an updated report published in 2014. This identified a requirement for an additional 4 pitches to be provided in Adur by 2027. The proposed development at New Monks Farm requires the relocation of the current publicly owned Gypsy and Traveller site known as Withy Patch. The relocation of the site together with the provision of the additional four pitches will meet the Districts future identified needs and help to resist unauthorised private sites being established. If the site is not relocated it is understood that the County Council would have to invest significant funds to improve the existing poor quality facility.

Economic Benefits

In terms of the wider economic benefit of the development the ES (Socio-Economic Chapter) identifies that the £150 million capital investment in the development would secure an annual £11.5 million Gross Value Added (GVA) to the local economy. This is set out in the following table:

| | | |
|---------------------------|-------------|------------|
| New Homes | £3,171,996 | £1,871,477 |
| New Commercial | £5,488,560 | £4,390,848 |
| Adur Economy GVA | £8,660,556 | £6,262,325 |
| New Homes Bonus (2 Years) | £186,023 | £18,602 |
| Additional Business Rates | £1,500,000 | £1,200,000 |
| Council Tax Revenue | £1,108,671 | £653,217 |
| Total Public Sector | £2,794,694 | £1,871,819 |
| Total Economic Impact | £11,455,249 | £8,805,964 |

The review of the retail impact demonstrates that the IKEA store is unlikely to have any detrimental impact on existing town centres and this reflects the fact that it draws its customer base from a wide catchment with many residents of Adur and Worthing often travelling some distance to visit the nearest store (over an hour's drive). The ES suggests that nearby centres in Adur are likely to be positively benefitted by linked trips by visitors travelling beyond the immediate catchment area of Adur. This is disputed by some objectors and the extent of linked trips is not clear. However, given the draw that IKEA creates from some distance away, there is the likelihood of some trips being linked with other shopping or tourist attractions in the area which would have a beneficial economic effect.

The overall economic benefits are disputed by some objectors and existing businesses who have expressed the view that the traffic implications of the proposal would have a negative economic impact. Lancing College, in particular, is concerned about the traffic implications of not adding a 4th arm to the new roundabout to serve Coombs Road and that this would adversely affect the attractiveness of the College as it competes with other private schools in the wider area. This matter is addressed later in the report; however, the application is supported by other business organisations such as the Chamber of Commerce, the West Sussex Coastal Partnership and the Coast to Capital LEP. Notwithstanding the concerns of some local businesses, your Officers accept that the development would have an overall positive economic impact on the area.

The circa £2.8 million in public sector receipts is also a relevant consideration for Members in weighing up the positive and negative impacts of the development.

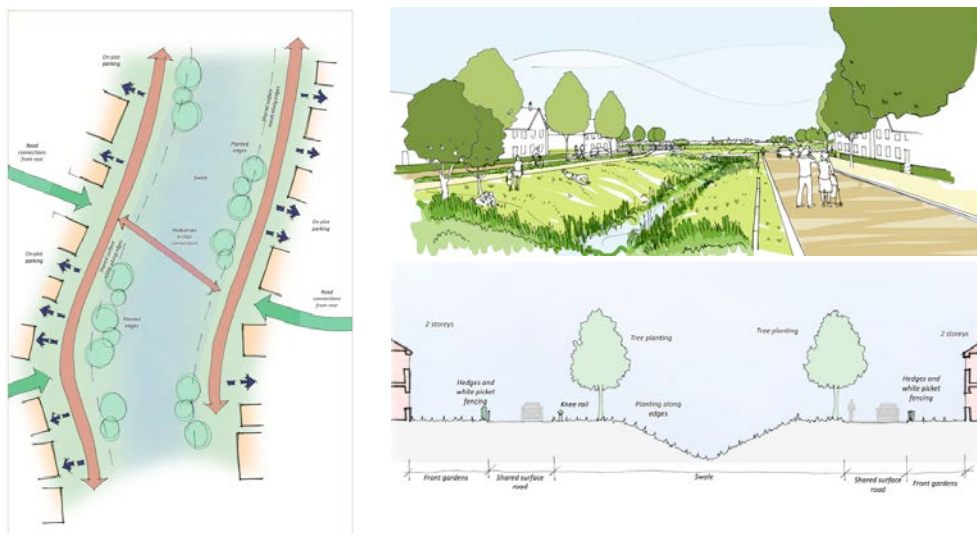
Drainage and Ecology

A more detailed assessment of the drainage strategy and ecological enhancements proposed is considered in the next section of the report. However, these matters have had a significant impact on the proposed Masterplan and the ability to contain development to within the indicative built up area boundary.

As stated previously the design of the residential areas and the Country Park has been heavily influenced by the overall drainage strategy for the site – primarily to provide additional capacity within the network of ditches across the site and to provide ecological and biodiversity enhancements to the partly implemented golf course site. This has had a significant impact on the residential layout. The layout has sought to make features of two primary ditches running through the site and by creating terraced embankments the intention is to *'connect park users visually and physically to the biodiverse rich waterways'*.

The terraces as well as creating informal seating would also provide additional storage capacity as part of the SUDs solution to restrict the rate of run off during high rainfall events.

The following cross section illustrates the overall width of the waterway and grass banks and has, as a result, restricted the development area. Whilst, the amount of development could have been reduced to remain within the indicative boundary, given the requirement to meet a minimum of 600 dwellings and the overall housing need within the District, reducing the scheme by 47 dwellings would be of some concern. Nevertheless, the landscape impact of the housing encroachment within the area previously designated as Country Park would have to be appropriately mitigated.



Throughout the progress of the Plan, concerns have been raised about the scope to adequately address surface and groundwater issues across the site as well as surface water. The drainage strategy developed to address these issues has significantly increased the overall infrastructure costs of the development and is a material planning consideration in determining this application. The costs are also higher as the application is seeking to deliver a drainage and access solution for the commercial development at the airport at the same time.

Additional Pitches

The inclusion of the two additional football pitches adjacent to the B&HAFC training ground clearly reduces the area available for the Country Park. The adopted policy does not make any provision for these additional pitches and therefore these would need to be justified to be considered as part of the proposal. The applicants were requested to clarify the need for the pitches and the following statement has been submitted,

‘Changes in the FIFA rules relating to adding additional players between transfer windows.

When we (B&HAFC) originally designed the training ground Football League clubs were able to take advantage of an “Emergency Loan Window” between the official Transfer Windows which enabled Football League Clubs to bring in players at almost any time in

the season. This meant that squad sizes could be kept relatively low because Club's were able to bring in replacement players if one of the squad was injured. This rule did not apply to the Premier League.

However, FIFA the World Governing Body in Football, were not happy with this exception granted to English Clubs in the Football League and this concession was withdrawn at the end of the 2012/13 season.

The situation therefore, both in the Football League and Premier League is that a club is now no longer permitted to sign players between the two transfer windows. The effect of this is that all clubs now have to have much bigger playing squads to be able to cope with a situation where first team players are injured which can in some positions lead to double the number of players employed by the Club. For example, we now have four goalkeepers instead of two.

All of the players have to train daily to maintain their fitness to ensure they are ready to step in if a regular first-team player suffers an injury. This means that we have to use more pitches each day and whereas we used to be able to rotate on two pitches daily we can be using up to three. To reduce pitch wear and increase the capacity for rotation therefore we need additional pitches to be able to cope with this additional demand.

Achieving Tier One Status in the Women's Super League

Over recent years the Club has invested heavily in the Women's game and last season our Women's team won promotion to the Women's Super League second division (WSL2). WSL2 is a semi-professional league with the players on part-time contracts training in the evening and playing at weekends.

However, the Football Association have recently changed the licensing requirements of the Women's Super League to promote the game nationally and have now created a full-time professional league commencing in August 2018 to be known as the Women's Super League. Clubs who compete in this league will be granted a "Tier One" licence. Players in this league will be on full-time playing contracts with the club and following a very similar training routine to the men. The main difference being that instead of training in the evenings after work they will now train during the day and be fully available on site all day long.

This means they cannot share the use of the pitches or facilities used by the men's club during the day and we have to replicate their facilities.

We took the decision to apply for a Tier One Licence and were advised by the FA in November last year that our application was successful. This represents a very substantial investment by the Club in the Women's game in the South of England and we will be one of just 14 Clubs throughout the UK to hold this licence. It will result in a substantial increase in the number of people employed to support the Women & Girls Club, including coaches, sports science staff, medical staff, administrators etc., as well as now employing players on full-time player contracts.

Their full-time training programme demands additional training time and grass pitch access during the day which we cannot accommodate with the current facilities which are fully utilized by the First team and Academy of the men's club.

In short, therefore, the additional pitches will support our very significant investment in the Women's game and provide even better pathways for young female players who want to progress to become female professional footballers.'

Whilst, the inclusion of the additional pitches into the Country Park would have ensured a larger area for recreational use, as stated above, the Country Park does provide sufficient space to meet informal recreational needs and space to provide landscape and ecological/biodiversity enhancements to the area (considered below). On balance, the additional pitches are considered acceptable provided that they remain as unlit grass pitches. A clause in the agreement to prevent the installation of lighting at any time would provide additional safeguards to protect the sensitive edge to built development. The continued success of the Football Club is important to the local economy and the rapid progression of women's football at the club can only enhance the achievement and ambition of local players. It is relevant to note that in West Sussex, the lowest areas for sports participation (measured as people participating in sport at least once a week) is in Adur (33.5%) and the development of women's football and enhancement of sports facilities generally is vitally important to improve sports participation.

Landscape Implications and Country Park

As a result of the housing and IKEA store extending across the indicative built up area and the inclusion of two additional pitches for B&HAFC training ground, this would have a knock on effect on the land available to provide the Country Park.

Given the need for housing and the employment benefits of the development and the layout implications for addressing drainage and ecological corridors through the development, it is considered that there would be some justification for extending the built up area. However, if viability and drainage considerations indicate that a flexible approach to the built up area may be justified, this has to be balanced against the landscape implications of any extension beyond the indicative boundary and the impact on the size of the Country Park and the Local Green Gap seeking to prevent the coalescence of settlements.

As indicated previously the indicative boundary for the built-up area did not follow any existing landscape feature on the ground but was based on an assumed density calculation for the housing and employment generating uses and to reflect the transition in visibility and sensitivity of the landscape from east to west. In this respect, the indicative boundary was influenced by areas that are visible in the highly sensitive elevated views from the open access land at Lancing Ring, from Hoe Court and Mill Hill in the SDNP. An assessment of these views shows that the indicative built up area boundary broadly separates the areas that are more visible from these sensitive SDNP viewpoints (to the east of the indicative line) and areas that are less visible (to the west). Whilst, it is acknowledged that this assessment was not an exact science as there is a gradual shift in degrees of visibility, the key influence on the built-up area boundary alignment in this area is visibility rather than a landscape feature 'on the ground'.

The indicative built up area boundary was aligned, therefore, to minimise predicted impacts on the sensitive views from the SDNP and so a key consideration is the extent to which the proposed development can be expected to cause harm to the landscape setting of the SDNP, a protected landscape which is of national importance for scenic beauty. The alignment of the BUAB was also influenced by analysis of landscape character and views across the Lancing-Shoreham Local Green Gap (LGG) with the objective of defining an area of built development which would minimise the perceived coalescence of settlements within a part of the coastal plain which is so heavily urbanised that the remaining gaps provide critically important visual breaks which contribute a valuable sense of identity and place.

The extent of development beyond the indicative boundary is such that it does impact on the Local Green Gap and inevitably on the sensitive landscape between the settlements of Lancing and Shoreham. The extent of harm on the Local Green Gap and the setting of the National Park and heritage assets is assessed in greater detail later in the report. However, the Country Park was specifically designed to provide a landscape buffer to the strategic housing site in response to the landscape concerns and to provide a recreational amenity for new and existing residents.

As Sussex Wildlife Trust points out, it has not been clear in the submissions how much land would be made available to the Country Park. As originally submitted, the application indicated that a Country Park would be provided in accordance with Policy 5 (i.e. amounting to 28 hectares). However, when assessing the areas included in the Country Park it was not clear what areas had been included and some documents indicated that the Country Park included the two additional football pitches. Following negotiations to increase the level of screening to the IKEA store, the adventure play area was removed from an area to the east of the car park and this area now provides an area of landscaping and a reed bed (ecological area).

The applicants were asked to confirm the areas that they considered should be included in the Country Park calculation. A plan has been submitted which identifies that the main Park area to the east of the proposed development would extend to 24.058 ha. However, if the ecological corridor leading to land to the west of the school is included it would amount to 25.576 ha. If the area to the east of the IKEA car park is also included (the new ecological area) the amount of land would increase to just over 28 ha (**28.046 ha**). However, part of the land identified as the main Country Park area (24.058 ha) includes land owned by the airport and, whilst beneficial to include as part of the Country Park (providing public access to the Trainer Dome), the scheme only exceeds the minimum 28 ha set out in Policy 5 by including a number of strategic planting areas and land owned by the airport.

The intention of the Country Park was to provide both informal recreational space to existing and new residents and provide a landscaped buffer to the proposed development. The strategic planting areas to the south of the commercial store and to the east of the IKEA car park have more limited benefit as functional recreational areas as they are separated by the main access road serving the development. However, the Country Park was not required to provide open space for the development per se as it would far exceed the open space requirements for 600 dwellings. In this respect, the area of land would still

be a significant contribution towards open space provision for both Lancing and residents across the District. The comparisons to other large parks in Adur, included in the DAS and set out below, illustrate the size of the new Park and its contribution to informal recreation, notwithstanding the inclusion of some landscaped areas detached from the main area of the Park.

| | |
|--|----------------|
| Adur Recreation Ground (also within the Local Green Gap) | - 8 hectares |
| Buckingham Park in North Shoreham | - 14 hectares |
| Brooklands Pleasure Park on the Lancing/Worthing boundary | - 23 hectares. |

The loss of recreational space is not, therefore, considered an issue in itself. However, the reduction in the size of the Country Park does impact on its ability to provide a landscape buffer to contain development. The reduction in size of the Country Park, therefore, is of more significance in terms of its impact on the wider landscape and eroding the sensitive Local Green Gap and its objectives of avoiding coalescence. This is considered in more detail after considering the different components of the scheme and design and layout considerations. The application does not meet the requirements of Policy 5 in terms of delivering a minimum of 28 ha.

Design and Layout Considerations

Non-Food Retail Store (IKEA)

Whilst, the DAS does consider some layout options they are limited given the scale and size of the building as indicated earlier in the report. By locating the building north-south it limits the length of the building onto the A27. The building is of significant scale measuring 186 metres long and a maximum width of 120 metres. To give some context to the proposed building its area is the equivalent of 4.25 football pitches. The north elevation facing the A27 is 80 metres and the south elevation is 97 metres wide. During negotiations to reduce the visual impact of the development the store parapet height was reduced from 13.10m to 12.14m. Plant rooms (5 in no.) set back from the roof would extend beyond this height with the highest plant room measuring between 14 and 15 metres in height.

The DAS makes it clear that the corporate brand is important to IKEA and that it is part of the customer experience - the design approach is the '*clarity of the brand, recognisable in the blue and yellow colours, representing "IKEA". The colour combination advertises the presence of the store.*' This visibility and direct access to the A27 is clearly why IKEA feels this is an ideal location for its store but it is also why so much concern has been raised about the visual impact of the development given its sensitive landscape setting.

The stated design philosophy is to use,

'the functional elements of the building both to inform and to form the elevational composition - employing proportioned, simple, bold shapes. The form is unadorned, modern architecture, 'form following function' (Louis Sullivan) where the disposition of shapes and colour creates the architecture, rather than ornament. The elevations are the result of a careful balance between function and aesthetics. Such a large building needs a

bold, unfussy treatment. The main retail function is contained within a plain blue box. Fenestration, where suited to the internal function is concentrated into discrete panels'



The strong corporate approach has meant it has been difficult to secure meaningful alterations to its overall design and use of colours and the main emphasis in the supporting statements has been on landscaping around the building to reduce its visual impact. However, this has been hampered by the fact that landscaping is a reserved matter for the store but not for the Country Park surrounding the store site. More recent changes have sought to integrate the landscaping approach and the latest alterations to the north elevation of the store in response to concerns about elevated views of the building have been a significant step forward. These matters are discussed in further detail below.

The main landscaping for the store has been to the south and west with a reliance on existing planting to the north and east. To the south of the building a 15 metre landscaped bund is proposed. The bund at 3 metres in height and with the proposal for extra heavy and heavy standard trees together with some semi-mature planting it would provide a fairly comprehensive screen adjacent to the southern boundary of the site reaching 9 meters in height after the first year (as indicated below).



The main concerns about the IKEA layout has been the lack of landscaping on the north and east elevations of the site. This is largely as a result of the northern watercourse and the lack of space to provide structural planting along this boundary. There was also concern about the lack of planting in the car park and in the area to the east of the car park where an adventure playground was previously proposed. The latest set of amendments to the scheme (May 2018) have sought to address some of these issues and the latest Landscape Framework plan for the site is attached as **Appendix 5**. The overall landscape impact of the development is discussed later in the report.

Architecturally, the building is of little quality and is, effectively, a large retail warehouse. As indicated by the DAS, it is very functional and in many respects, it would be difficult to improve its architectural appearance or try and break up the mass of the building. Incorporating additional glass would only increase concerns about illumination and, therefore, the emphasis on landscaping and colours of the building has been the key focus. Nevertheless, the concept of louvres to screen the north elevation is positive. When the idea was first discussed some images were submitted and these helped to visualise the external effect (see below).



However, these were not formally submitted and the applicants have been requested to provide further supporting information. The principle of louvres to screen elevated views is supported by the Council's Landscape Consultant and the SDNP. However, further detail is required to demonstrate that the proposal would have the desired effect. The photograph indicated above is from Bergen in Norway and therefore different architectural techniques have been used elsewhere to improve the appearance of IKEA's buildings. The intention is for the louvres to be constructed of metal with a neutral colour. A condition is proposed to reserve the final design of the louvres but it is hoped that additional supporting information will be available at the meeting. Returning the louvres to part of the east elevation would be beneficial to further break up more distant views of the building and diffuse the dark blue dominant colour of the store.

In relation to the car park, the amended plans have reduced some of the linear parking by rotating some of the aisles at the eastern end of the car park. This has helped introduce more pockets of planting. In addition, double length tree planting has been provided as walkways to the store entrance which in time would also reduce the visual impact of the very large surface car park. The Landscape Framework plan also identifies additional planting to the south of the service road running along the north elevation which would help to screen the northern elevation from the A27.

Residential

The adopted Local Plan requires all development to be of a high architectural quality and respect and enhance the character of the site (Policy 15). NPPF also highlights the importance of good design and the need to establish a strong sense of place and respond to local character (paragraphs 56 and 58). Overall your Officers have been pleased with the design quality and layout of the proposed residential development. The individual design of houses reflects local vernacular whilst, an opportunity has been taken to introduce some larger apartment buildings which incorporate a more contemporary approach.

The concept of more formal perimeter blocks of houses and apartments at higher density to the west of the site and along the main access from the A27 gradually changing to lower scale and density to the south west of the site is supported. The following images from the DAS providing a useful indication of the overall design quality and layouts proposed. The approach of landscaped verges and set back pavements has been successfully used on other estates within the County and creates an attractive landscaped feel to the new housing areas.



There were some concerns, however, about some of the original character areas and whether sufficient regard had been given to the extension of housing beyond the indicative built up area boundary. Your Officers also suggested changes to some detailed design and layout aspects to create a more varied streetscape and these are discussed below in greater detail.

Whilst, the concept of larger apartment blocks was supported adjacent to the IKEA store and along the main access to the site, as it provided status to the main access road, your Officers felt that this approach should not follow through to Hayley Road as this would be a more secondary bus and pedestrian access when the new A27 roundabout was open. It was also considered that there was scope to create a feature building at the point when the main spine road would turn to serve the rest of the residential development. This also provided an opportunity to create a more attractive enclosed area of open space to the east of the Hayley Road. An extract from the Masterplan showing the original and amended plans is shown below to illustrate these changes.

Original submission



As amended



The original Masterplan identified a character area defined as 'Swales and Country Park edge' and this included the dwellings fronting the enlarged drainage ditches (swales) as well as the south-east corner of the development, extending beyond the indicative built up area. The Councils Landscape Consultant felt that this south-eastern corner justified a different approach in terms of density and landscaping to recognise its landscape impact on the Local Green Gap and Country Park. The amended Masterplan and DAS now indicate a specific character area for the south-eastern section indicating lower density and additional landscaping. It will be important that for subsequent reserved matters applications the indicative character areas and design codes are followed.

The extent to which the amended plans address landscape issues is considered later in the report. However, the indicative designs for properties adjacent to the ditches (swales) and Country Park and the south-east corner are of high quality with the introduction of boarding and a more organic layout appropriate for the edge of settlement, as illustrated by the sketch below:



Full Application

The detailed design for the 249 dwellings has also been carefully assessed and as indicated previously the following amendments secured to improve design quality:

- Incorporating hip and half hips to provide greater variety in the roofscape and provide airspace between dwellings particularly where there are long runs of similar semi-detached semis (plots 92-95, 46, 57 and 166 -171 for example).
- Seek to address the uniformity of porch design throughout the development and look to provide some greater variation to fenestration.

- Look to incorporate chimneys to help provide more visual interest and vernacular detailing.
- Reviewing corner plots to ensure that blank elevations front onto the highway. There are a number of examples where dual frontage dwellings should be considered or at least look to incorporate additional design features (e.g. bays or oriel windows/fenestration) to avoid large blank gables (for example plot 57, 58 62, 69 and 91).
- Consider handing plots 198 - 200 to provide a better composition.
- Review Plots 73 - 76 and 77- 80 where windows do not align (ground floor and first floor) again consider hips.

The amended plans address these issues satisfactorily and will create an attractive and varied streetscene as illustrated in the following example. A mixed palette of materials is proposed with a mix of brick, render, tile hanging and boarding. The Head of Housing has supported the overall housing mix although has made a request that Cala Homes considers the scope for some 4 bed affordable units in phase II. The first phase would deliver 75 affordable homes ranging from one bed apartments to 3 bedroom houses.



Highways and Accessibility

Overall Access and Movement Strategy

The overall access and movement strategy, as amended by the applicants, now complies with the requirements of Policy 5, national policy contained in the NPPF and guidance in the NPPG. In this respect, the application proposes a joint access strategy with the airport and reflects the policy requirements of both strategic allocations. The residential development is phased in accordance with the plan to limit only 249 dwellings via Hayley Road until the new roundabout has been constructed onto the A27. Negotiations over several months have sought to improve pedestrian cycle and equestrian connectivity, however, considerable concerns remain from local residents about this aspect and the impact of the IKEA store on the already congested A27 and local highway network as well as air quality, noise and other environmental effects.

Given the current congestion on the A27 it is perhaps unsurprising that traffic associated with the development is by far the biggest source of objection to the development. The fact that the application coincided with public consultation on the wider improvements to the A27 last summer (Road Investment Strategy (RIS)) has compounded concern about the current proposal. The uncertainty on the improvements proposed to the Worthing to Lancing stretch of the A27 has also complicated discussions regarding the access strategy for the development. Nevertheless, the Council has a duty to determine the application as submitted and it is relevant to note that the A27 consultation scheme assumed Local Plan predicted growth (and associated traffic) and that the strategic allocation at New Monks Farm and the Airport would deliver a new roundabout to replace the Sussex Pad signalised junction.

Comparison with predicted Local Plan Traffic generation

In terms of assessing the extent of harm caused by the current proposal, the highway authorities have compared predicted traffic flows with that proposed in the Plan. In this respect, Members will be aware that in preparing the Local Plan the Council appointed Consultants to assess the impact of Local Plan traffic and the Transport Study informed the Infrastructure Delivery Plan (IDP) in terms of what mitigation would be required.

Both West Sussex County Council (WSCC) and Highways England (HE) have been satisfied that compared with the traffic generated by the Local Plan allocations (in total 25,000 sqm of commercial floorspace for both NMF and the Airport) the development would result in a decrease in trips in the AM peak period and an increase in trips in the PM peak and Saturday peak periods.

The reasons for this are twofold, firstly the IKEA store would not open until 10 am and therefore generate traffic outside of the morning peak period (other than staff movements etc). Secondly, the development at Shoreham Airport is proposed to be B1(c) light industrial, B2 Heavy Industrial or B8 Storage and Distribution but not B1 (a) offices and therefore would generate less traffic movements than assumed as part of the Local Plan assessments.

It would be important to restrict the type of development coming forward at the airport in line with the joint access strategy. As there are two separate planning applications and landowners it would be ordinarily difficult to secure this restriction. However, there is an existing legal agreement (s52) restricting development outside the confines of the existing terminal buildings and any resolution to grant the current application could also resolve to only lift this restriction for development at the airport if it was for specific B uses (i.e. restricting the development of any office development other than ancillary to B1 or B8 uses).

This does not mean, of course, that there would not be increased traffic and activity on the local highway network at other times of the day and night, but in highway terms the capacity issues to resolve for the IKEA store relate purely to the increase in traffic during the weekday PM and Saturday peak periods.

Given the complexity of the highway aspects of the development, the applicant has held a number of transport workshops with the highway authorities and Transport Consultants working for HE to address various issues with the submitted Transport Assessment (TA). The following list sets out a number of the initial queries:

- Peak hour assessment and clarification on flows at the A27/Coombes Road/Old Shoreham Road junction;
- Traffic growth and future year forecast flows;
- IKEA trip generation;
- Primary school trip generation;
- Shoreham Airport employment trip generation;
- Wider network impact and formal capacity assessments; and
- Consideration of Framework Travel Plan commitments.

In response to these queries, the Further Information to the TA was submitted and there has been an ongoing dialogue with HE to assess the detailed design of the A27 roundabout including the undertaking of a safety audit.

There has been some scepticism about the traffic assumptions used by IKEA as the submitted TA compares characteristics associated with the IKEA store in Cardiff. However, the highway authorities have accepted this approach primarily because the population catchments are considered to be similar (1.7 million for Cardiff and 1.8 million for New Monks Farm). Both these catchments account for competing IKEA stores for example in the case of Lancing, the overlap with Southampton, Croydon and Reading. In addition, both stores are located adjacent to important links within the highway network (i.e. the A27 and A4232) and both of which accommodate approximately 58,000-60,000 Annual Average Daily Traffic (AADT) and have good visibility from passing traffic on key commuter routes. As such, it is accepted that the Cardiff IKEA is a suitably comparable site. The applicant's highway consultants submit that there is no reason that the age of the Cardiff store (2003) would affect its trip attraction, with this store being up to date in carrying the full IKEA range, which would also be offered in Lancing.

The following table illustrates the level of trip movements to the store during the different peak periods.

| Time Period | Vehicle Trips | | |
|----------------------|---------------|------------|-------|
| | Arrivals | Departures | Total |
| Weekday Morning Peak | 23 | 5 | 28 |
| Weekday Evening Peak | 171 | 180 | 351 |
| Saturday Peak | 506 | 515 | 1,021 |

Source: Proposed IKEA Exeter Transport Assessment prepared by Vectos (2013)
Table 12.3: Predicted IKEA Store Traffic Attraction

The applicants Highway Consultants were, however, requested to undertake further sensitivity testing including modelling an extra 500 two-way trips in the weekday evening peak. This was primarily because the surveyed flow from the Cardiff store varied so much during the day and in light of the differences in the catchment population with Lancing. However, the sensitivity testing demonstrated that the site access would still operate within capacity.

The proportion of pass-by (or linked) trips compared to primary (home to store and back) was assessed using customer survey results from the Bristol Store. The TA has used this as the basis for assessing trips to the store with the following proportions, 70% primary vehicular trips, 20% pass-by trips and 10% diverted trips in the weekday evening peak. On Saturday, it has been assumed that 85% of trips will be primary trips, 10% pass-by and 5% diverted. However, the customer survey was undertaken during the day and therefore included many off-peak trips and in reality, the TA indicates that in the weekday evening peak, it is considered that there would actually be very few primary trips (i.e. mostly pass-by or diverted trips) associated with the New Monks Farm IKEA given the nature of the A27 as a key commuter route accommodating a large flow in both directions.

This is considered a reasonable assumption as it is unlikely that the majority of visitors would plan entirely new trips to access the New Monks Farm IKEA during the weekday

evening peak when traffic flows on the network are at their highest. Instead, the trip movements to and from the IKEA are more likely to be pass-by trips and diverted trips at this time, with visitors already on the network. It is considered that the TA is a robust assessment and looks at the worst-case scenario in terms of traffic generation.

On a Saturday, the TA anticipates that there would be an increase in the number of primary trips accessing the New Monks Farm IKEA when compared with the weekday evening peak (the level of primary trips increases to 85%). However, trip activity on a Saturday is likely to form part of an existing retail trip on the network, thereby limiting the number of additional primary trips on the A27.

Overall both highway authorities are satisfied that there has been a robust assessment of the likely traffic generated by the IKEA store and the new roundabout on the A27 would accommodate the traffic associated with the IKEA store, housing and commercial development at the airport.

Coombs Road Access/Lancing College

The highway authorities have raised no objection to the new A27 and despite significant concerns from Lancing College, there is no requirement to provide a 4th arm to serve Coombs Road. WSCC recognises that this would involve additional time and mileage for motorised users of Coombs Road but in highway terms, it is not considered necessary to add the 4th arm. The College has submitted a number of representations that the traffic and activity modelled from Coombs Road has been under-estimated the additional movements would affect highway safety and affect the overall viability of the College.

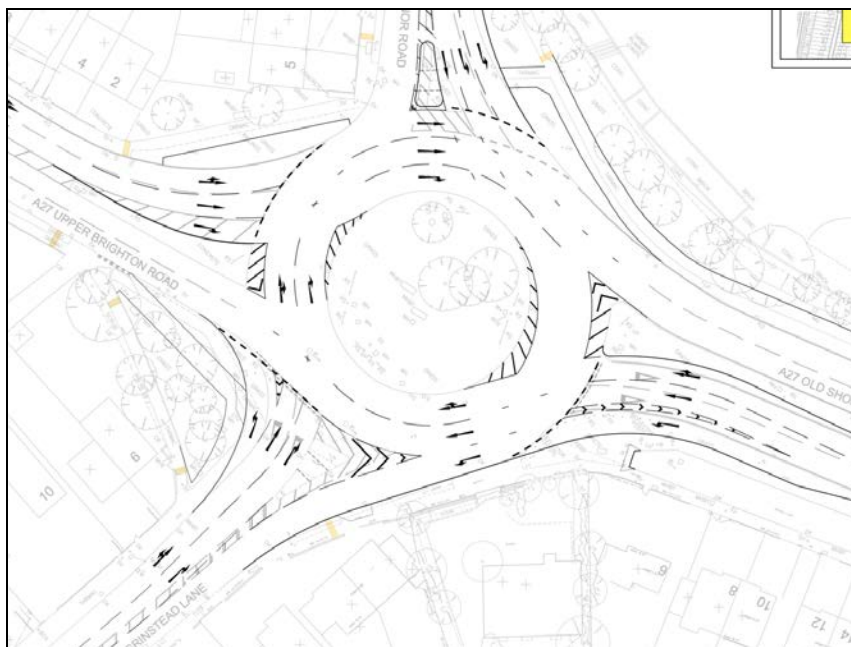
The applicants have met the College and agreed to look at the option of adding a 4th arm. A preliminary design and safety audit has been undertaken and an initial pre-application discussion held with the National Park (as the 4th arm would be within the Park and determined by the SDNP as planning authority). It is apparent that land owned by Lancing College may be required to ensure an acceptable scheme and therefore both the applicants and College would need to work together to secure an acceptable design for the 4th arm. Whilst, the College consider that the current application should be determined until this matter is resolved it is not considered that there are any planning grounds for doing so.

Nevertheless, there are benefits with the addition of the 4th arm, it would direct all movements to one junction, reduce U turn movements for traffic travelling from the east seeking to access Coombs Road and avoid Coombs Road traffic wanting to travel westbound exiting to the A283 Steyning Road roundabout performing a U turn and travelling back to the westbound carriageway of the A27. As Lancing College has a preparatory school in Worthing (Broadwater Manor) and takes children from the west a more direct westbound movement would be clearly beneficial. In these circumstances, it would be appropriate to encourage the applicant to continue a dialogue with the College and try and secure planning permission for the addition of the 4th arm. As indicated later on the report, funding for this would also be an issue but the applicant has agreed in the draft s106 agreement to use 'reasonable endeavours' to secure planning permission and if funding is available to implement the 4th arm with the new A27 junction works. Your

Officers have met the Capital to Coast LEP and are exploring other potential Government funding sources to secure direct access for Coombs Road.

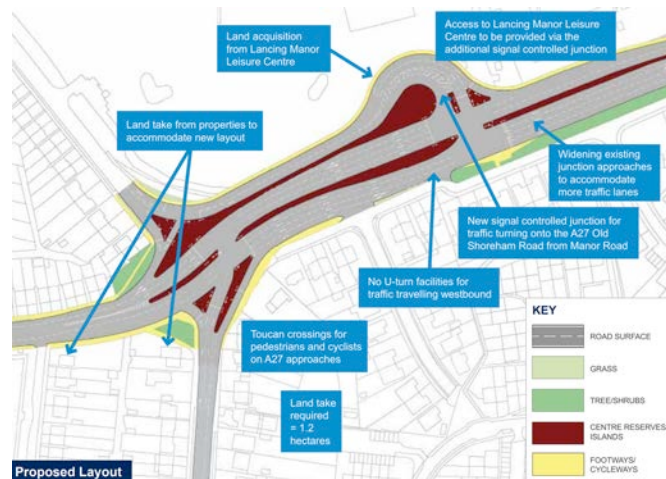
A27 Grinstead Lane Roundabout

The modelling submitted with the application highlights that the existing roundabout at Grinstead Lane is currently over capacity and would continue to be so in the future. In support of the Local Plan an improvement scheme for this junction was designed to address the predicted traffic growth in the Plan. However, the applicants' transport consultant has designed an alternative solution to mitigate the impact of development traffic. The alternative design is indicated below,



The modelling demonstrates that with the above improvement scheme implemented the maximum queue lengths would be in the AM peak with 5 vehicles on Grinstead Lane and 10 on Manor Road. The A27 arms, however, would still be over capacity but the HE has accepted that the scheme would provide a *'nil detriment'*. Concerns about the existing problems on the A27 have prompted many local residents to object to the proposal. However, as Members are aware, new development cannot be expected to solve existing infrastructure deficits but there is a need to mitigate the impact of the planned development. The NPPF is clear on this point, *"Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe."* (paragraph 32).

The consultation on the Worthing to Lancing A27 Highway Improvement scheme was undertaken last year and this proposed a more radical alteration to the A27 Grinstead Lane roundabout (as indicated below).



An announcement on the scheme has been overdue for a number of months with the latest indication being that it will be made in the summer. In these circumstances, HE has indicated that if the RIS scheme goes ahead funding equivalent to the cost of the applicant's highway improvement scheme (£640k) should be paid to HE via a s278 Highways Agreement. The RIS consultation exercise indicated that peak period journey times should reduce despite the projected growth in traffic and it was estimated that a 3-minute journey time saving would be made in the AM peak and 5 minutes in the PM peak. The RIS scheme is proposed to be completed by 2022 although a significant amount of design and planning work would need to be carried out to meet this timescale.

Impact on the wider highway network

WSCC is satisfied that the TA demonstrates that the additional traffic generated from the IKEA store would not increase above that envisaged by the Local Plan and therefore additional mitigation, over and above that set out in the Infrastructure Delivery Plan (IDP), is not required. The Transport Study supporting the Local Plan looked at the mitigation necessary for key junctions in the study area and set out the required level of contributions from the strategic development sites. As the application includes proposals to upgrade the Grinstead Lane roundabout this is a greater cost than envisaged in the IDP and as a result, costs would need to be re-allocated to deliver the wider mitigation improvements at other junctions. For instance, West Sompting would not now need to contribute to the Grinstead Land roundabout but would need to pay higher costs for other junction mitigation. The County Council is seeking to re-proportion the costs for improving other junctions affected by Local Plan development sites.

A number of measures have been put forward to encourage local residents to access the store by public transport, cycling and walking and these are set out below. Whilst, the IKEA concept is starting to change with more online sales (and smaller click and collect stores) the concept of the large warehouse in key locations remains the business model as described in the retail section of the report. Nevertheless, to address concerns about local traffic adding to the level of congestion on surrounding roads IKEA is being encouraged to offer free deliveries within a 5-mile radius which would encourage more sustainable modes of transport to the site particularly for local residents and avoid a number of short vehicle movements.

Pedestrian, Cycle and Equestrian Accessibility.

The loss of the at grade pedestrian crossing has provoked considerable opposition from local residents, cycle and equestrian groups. The application originally proposed an at grade signal crossing across the two carriageways of the new A27 roundabout to link to Coombs Road. Following concerns about this provision, the application was amended to provide a route alongside the River Adur from the Shoreham Toll Bridge northwards passing under the A27 and then turning westwards to link with Coombes Road (upgrading part of footpath No. 2049). A parallel application to the SDNP sought permission for the section of footpath within the National Park (this is to be considered by the National Park Planning Committee on the 12th July and Members will be advised of the outcome at the meeting).

The concerns about this new footpath section relate to its acceptability for equestrians and a less convenient route for other users. The proposal would not meet the minimum requirements referred to in guidance from Sustrans and The British Horse Society (as stated in their letters of representation). Sustrans has produced a guidance Note 'Horses on the National Cycle Network' - Technical Information Note No. 28 which states that,

'The British Horse Society (BHS) recommends standards and dimensions for shared use paths. This guidance states that a minimum width of 5m for new bridleways is desirable, however, it recognises that this is not always possible. This does not state clearance requirements on each side of the path, so the 5m approximates to a 3m path with two 1m verges; this allows for vegetation which may grow in from the sides, livestock which may put their heads over a fence, easy access for maintenance machinery, and reduces the likelihood of surface damage where a path is unsealed.'

A cross-section is also indicated below,

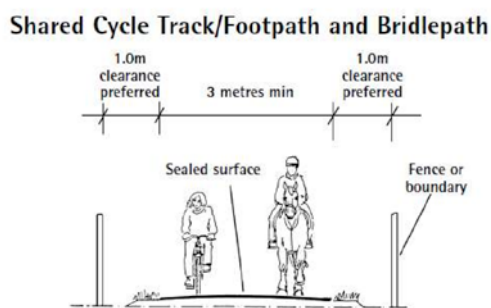
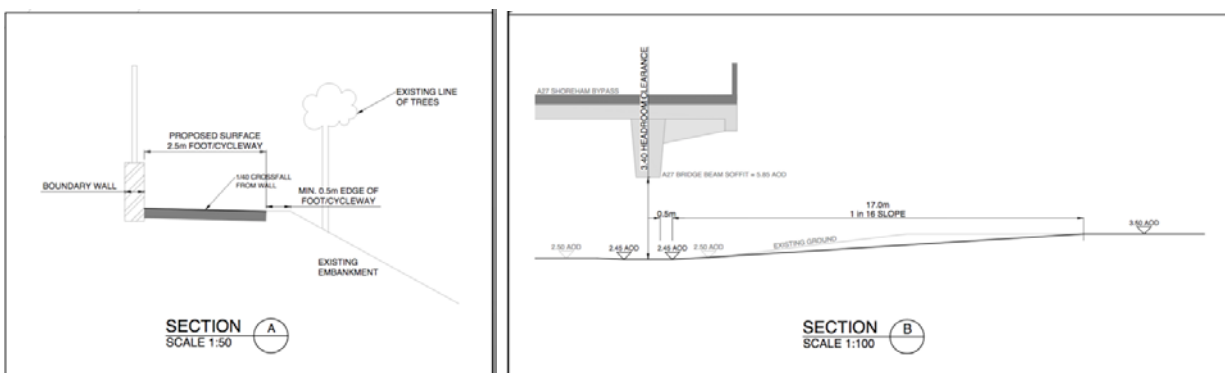


Figure 2 – Sustrans information sheet FF27

The application shows that a path of 2.5 metres can be achieved but this would be from the boundary wall with Ricardos. This widens to 3 metres as it exists under the A27. In terms of available height under the A27 the submitted improvement plan indicates that 3.4 metres is the minimum clearance achievable (as indicated in the cross-section below). The Sustrans technical guidance note refers to the British Horse Society guidance - Bridleways and Byways, 2010 which states that, *'Headroom at subways and under-bridges: desirable is 3.7m, minimum 3.4m though in exceptional circumstances a lower height may be acceptable.'*

However, the Sustrans Design Guide (2014) also suggests that a 2 metre effective minimum width is possible on lesser, rural, traffic free routes with the design manual for roads and bridges “Geometric Design of Pedestrian, Cycle and Equestrian Routes” (TA90/05) noting that unsegregated shared facilities have operated satisfactorily with widths of 2 metres with a combined pedestrian and cycle use of up to two hundred per hour. On this basis, it is not considered that the path would cause any conflict between different users. With regard to equestrians, ridden horses can occupy a width of approximately 1.5 metres and, therefore, the proposed route would also accommodate equestrians with room to pass for pedestrians and cyclists. It is also noted that the British Horse Society does indicate that horse riders, pedestrians and cyclists do co-exist without problems on many bridleways as narrow as 2 metres which provides further comfort that the route proposed is useable by a variety of non-motorised users (NMUs).



In view of the above, the only shortfall in standard is the width of the shared path for a section adjacent to the river. Whilst, it is accepted that it has its limitations, given the level of use by equestrians, the alternative of an at grade crossing by the new roundabout and the provision of a new safe crossing away from the busy trunk road the proposal is considered acceptable and complies with the Policy 5 requirement for improved access across the A27 to the South Downs National Park for pedestrians, cyclists and equestrians.

A number of objectors have argued that it would be less convenient than the existing Sussex Pad junction to use the new route under the A27 but many suggesting that it would lead to a 1.1 kilometre diversion from the west and nearly a 400 metre diversion from the east. However, this is not the case. There would be no diversion required when travelling to and from the west, at present NMUs must travel along the southern side of the A27 to the Sussex Pad junction using the existing unlit crossing facility to access The Drive or Coombes Road. With the addition of the new roundabout on the A27, a new 3 metre wide shared facility along the northern side of the A27 with appropriate surfacing and lighting and with a reduced speed limit of 50mph. The new dedicated crossing would also have a much shorter signal cycle time at the roundabout (60 seconds compared to over 120 seconds at Sussex Pad) which would result in an overall reduced crossing time. Movements from the west, therefore, would be improved compared to the existing Sussex Pad junction subject to a 70mph speed limit, is unlit and has a poor accident record.

From the east, the applicant acknowledges that the removal of the Sussex Pad junction will increase journey distances for NMUs. However, the relevant Highway Authorities recognise that this needs to be balanced against the current need for NMUs to cross the

A27 at the Sussex Pad junction with associated delays and safety implications. The existing Sussex Pad junction does have its limitations. There are effectively two separate crossings with guard rails provided within the central reservation to stop NMUs crossing in one movement. Highways England accept that this could result in a total crossing time of at 120 seconds for certain crossing movements as they are sometimes required to wait in the central reservation. The proposed alternative route does have an increase in distance of 320 metres and would take 230 seconds for pedestrians and 60 seconds for cyclists (average speed of 12 mph). However, if the delays at the Sussex pad junction are taken into account, there would be a reduction in travel time for cyclists but an increase in travel time for pedestrians of 110 seconds (if the maximum call time at Sussex Pad is taken into account). Nevertheless, the improvements in terms of the quality of provision at both the crossing point at the new roundabout and under the A27 would outweigh any potential delays. Certainly, the provision of an underpass allowing NMUs to cross the A27 without conflicting with high speed traffic would be a safer and more comfortable route improving accessibility between Shoreham and the National Park.

Some cycle groups and the West Sussex Access Forum have indicated that if Sussex Pad crossing is removed, it should be replaced by a bridge. It should be noted, however, that if a bridge were to be provided, it would not be any more direct as long ramps would be required at both ends similar to the pedestrian bridge at Upper Boundstone Lane. Whilst the Adur wide Transport Study has been looking at accessibility issues along this section of the trunk road, this has favoured consideration of a bridge within the existing built up area and closer to Lancing Manor Leisure Centre to improve accessibility to the sports centre and Lancing Green and the park beyond.

Lancing College has expressed concern about the proposed NMU route under the A27 and, in particular, concerns about the safety of its children using the unlit underpass. It is relevant to note, as mentioned earlier, that The Drive/Coombes Road and the Sussex Pad junction are not lit and concerns have been raised by the National Park about additional lighting. Nevertheless, it would be beneficial to consider some form of lighting along the length of the underpass and it is recommended that the applicant explores this matter further with Highways England.

Additional pedestrian/cycle connections are to be provided at:

- Mash Barn Lane - A shared use route is to be provided along Mash Barn Lane to the north-east boundary of the site, this would then link into the existing shared use route alongside the A27.
- Mash Barn Lane - A shared use link is also to be provided to the south west of the site via the Brighton and Hove Football club training facility.
- Alongside the bus gate connecting into Hayley Road.

As indicated by WSCC there is also scope to provide a footpath link to Shadwell Park to allow new residents to access the recreation facilities.

The applicants have also agreed to improve links off site and these include:

- Provision of dropped kerb/tactile paving within the residential area to the west of the site around Mash Barn Lane.

- Upgrade of pedestrian crossing of Grinstead Lane between Mash Barn Lane and Grinstead Avenue to allow cycle use with associated supporting approaching routes.

The above improvements would improve pedestrian and cyclist routes to Lancing centre, Lancing railway station and the Sir Robert Woodward Academy. This is illustrated in the applicant's plan attached as **Appendix 7**.

Car Parking

The proposed IKEA will provide a total of 853 generally available parking spaces in a dedicated customer car park, with access from the internal network. In accordance with County standards there would be an additional 55 disabled parking spaces and 40 family parking spaces located close to the main building entrance. Electric vehicle charging points are also to be provided with 6 dedicated bays within the main customer car park. There would also be an additional area to the rear of the IKEA building providing 67 car parking spaces for staff.

In determining the total number of spaces provided within the IKEA development, the application has assessed parking provision and demand at other IKEA stores to ensure that the parking supply is sufficient to accommodate anticipated daily demands. In addition, as part of the promotion of sustainable modes, 50 covered and 10 cycle hoop parking spaces are to be provided close to the main building entrances, equivalent to approximately 6% of the total car parking. Space is also to be provided for 10 motorcycle spaces, with secure facilities clearly identified within the main customer car park.

Air Quality

Members are aware there is considerable concern about air quality locally and nationally and a significant number of objectors have referred to concerns about air quality in response to the proposed development. The submitted Environmental statement (ES) concludes that the proposed and cumulative developments (including commercial development at Shoreham Airport) would not lead to significant changes in pollution concentrations at any existing receptors, including those within the declared Air Quality Management Areas (AQMA), or lead to the exposure of new receptors to unacceptable air quality. Taking into account mitigation measures, the overall impact of the proposed development on air quality (using nationally recognised and commonly used guidance) is concluded to be negligible in significance.

The Council's Public Health and Regulation Team consider that the Air Quality Assessment was generally carried out to an appropriate standard and that a suitable air quality model was used for the study. There were a number of concerns that the Public Health and Regulation Team originally raised in connection with the Air Quality Assessment, including the selection of receptors, phasing of development, worst case assumptions and proposed mitigation. Following a series of meetings, these concerns were addressed. This included an assessment of air quality impacts in the Worthing AQMA. The assessment concluded there would be an increase in absolute pollutant concentrations at all modelled receptors when compared to the original model results. However, in terms of significance, there was no change in the impact of the proposed

development on air quality at these receptors other than a change in the cumulative effect at one receptor, where the significance changed from 'negligible' to 'slight adverse'.

The applicant's emission mitigation calculation carried out in accordance with the guidance contained in the 'Air quality and emissions mitigation guidance for Sussex (2013)' originally identified a full emissions mitigation package of £909,000. Following the publication of the latest Emissions Factor Toolkit in November 2017, a recalculation of the 2027 Emissions Mitigation for the Development was undertaken and this reduced the overall mitigation sum to £663,457. This is primarily because the updated Vehicle Emissions Guidance resulted in a decrease in both NOX and PM10 emissions due to the actual 2027 vehicle mix being used as opposed to the worst case 2017 fleet mix used in the Air Quality Assessment. Furthermore, the latest guidance reflects the projected increase in electric and hybrid vehicles in the fleet by 2027. This is accepted nationally as a reasonable approach.

A number of discussions have been undertaken regarding the proposed mitigation measures, these primarily related to on-site options which would help target low to zero emission sustainable transport needs. A revised list of mitigation measures has been submitted which now totals £716,944 and exceeds the emissions mitigation calculation value of £663, 547. Whilst, Travel Plan co-ordinators are normally a requirement as part of any travel plan even if this figure was subtracted the emissions requirement would be exceeded. The key mitigation measures proposed by the applicant include:

- Provision of electric vehicle charging points in communal residential areas;
- 50 garages to have passive installations (7KW cabling with separate Residual Current Device (RCD) installed), 25 garages with EV points installed and discounted EV points offered to 100 properties (a total of 24% of garages to be built on the development);
- 5 EV posts for communal parking areas;
- 2 Rapid electric vehicle charging 'hubs' on commercial development accessible for commercial client and residential use;
- New and extended local bus services including: a low emission bus (min Euro VI) and bus shelters;
- Residential Car club provision with a dedicated car club space;
- cycle storage and docking stations – residential storage space and Commercial cycle docking/storage provision;
- New dedicated shared cycle, equestrian and foot routes;
- Improved unsegregated pathways for cycle, walking and equestrian use along the River Adur connecting the Sussex Pad/Combes Rd to the Shoreham Toll Bridge, under A27 fly-over;
- Commercial supply chain policies to reduce Carbon (and pollutant) emissions; and,
- Travel plans for residential occupants and commercial operator employees, including Train and bus timetables, Car share information, Cycle route information and a dedicated travel plan co-ordinator (residential and commercial) for 5 years.
- Home delivery: zero emission local delivery service (contracted out to IKEA supplier)
- Zero emission local delivery infrastructure (1x 50/22kW EV hub)
- Provision of two bike rack hubs (covered racks x 30 spaces)

The application also includes other sustainable transport options to be integrated to support the transition to low emission transport and encourage model shift, but will not be

included in the emissions mitigation scheme costs. These include 3.8km additional cycle and footway paths across the development and the Country Park to connect local residents to Lancing, the South Downs, the new Country Park and Shoreham. The application also proposes improved bus service routes into the site serving Shoreham and Lancing.

There has been an ongoing discussion with the applicants regarding improvements to accessibility between the site, Lancing and the A27. The provision of a signalised pedestrian crossing at Grinstead Lane and the new route under the A27 will help to promote walking and cycling from the site to the Downs and Lancing and Shoreham town centres. Some of the mitigation measures indicated above are what would normally be considered necessary to encourage more sustainable modes of transport to and from the site and the provision of travel plan initiatives is a normal planning requirement.

It is not clear what (if any) air quality monitoring Highways England has envisaged with its Road Investment strategy scheme (RIS), but it is considered reasonable to require air quality monitoring stations in connection with the proposed works. This matter has been raised with the Highways Agency and it is considered reasonable that whatever scheme is implemented for the Grinstead Lane roundabout that air quality monitoring stations are installed.

The provision of EV points in some of the garages proposed in the residential development is welcomed, although there are now schemes in Sussex where developers are including passive or full installations for every home. This is certainly the trend and many European Countries are making it a requirement to install EV points in all new homes. The Transport Secretary, Chris Grayling recently announced on the 10th July that the Government aims to make it easier to recharge an electric car than refuel petrol or diesel vehicles. He also announced that a number of measures would be suggested in a forthcoming consultation paper including:

- The need to assess if new homes and offices should be required to install charging points as standard
- New street lighting columns with on-street parking to have charging points in appropriate locations
- More money being allocated to fund charging infrastructure.

The Transport Secretary said the proposed measures would mean the UK having *"one of the most comprehensive support packages for zero-emission vehicles in the world"*.

It is suggested that the requirement to provide EV charging points may be covered under changes to Building Regulations and this could potentially affect dwellings being built in later phases. Whilst, Public Health & Regulation have pushed for a larger number of EV points no agreement has been reached. Given that the emerging WSCC Updated Parking Standards indicates 10% of new homes should incorporate EV points, it is difficult to pursue this matter further as the number proposed by Cala Homes would exceed this target. Nevertheless, as indicated changes in legislation may well bring about an improved percentage in later phases.

The scope to encourage IKEA to implement a free delivery service for local residents is considered to be extremely beneficial and IKEA has been encouraged to consider this initiative, particularly for residents living within 5 miles of the store. This would assist with reducing the number of local car trips and encourage more sustainable modes of transport to the store. It is considered that this is an important measure that could have a significant impact on local travel movements associated with the store and should be pursued through the commercial Travel Plan. The introduction of a low emissions delivery vehicle is welcomed.

Noise and Vibration

The submitted ES addresses noise and vibration impacts of the development during the construction and operation of the proposed mixed use development.

Construction Phase

It is accepted that during the construction of the development, there would be potential adverse effects on existing and proposed dwellings and the gypsy and traveller site. To address these adverse effects, a 2 metre high temporary barrier is proposed along the western and northern boundary of the site during construction of Phase I of the residential development and these barriers would also be employed to protect the occupants of the old and relocated Withy Patch Gypsy and Traveller Site.

In terms of construction vibration, the principal area of concern relates to vibration from piling operations. It is submitted that Certified Piling Contractors (CPC) would be used at all times and the likely impacts of piling would have to be determined by undertaking trial piles and recording vibration impacts at the nearest noise receptor. This is a matter that would need to be addressed as part of the Construction Management Plan.

Post Construction – Operational Noise

The ES submits that the effect of changes in road traffic noise would be negligible at most receptors even when considering the cumulative effect of the Shoreham Airport Scheme. The Noise Assessment does indicate some major adverse impact to the rear of the retained property New Monks House and specific mitigation measures, in the form of barriers, are to be included as part of the development.

In terms of the retail store service yard, the Noise Assessment indicates that there could be significant adverse effects at night, particularly to the Phase II dwellings and, as a result, a 3 metre high acoustic barrier is proposed around the service yard to protect the proposed dwellings.

The Noise Assessment also indicates that there could be noise from the new football training pitches with noise levels exceeding the relevant British Standard, however, the application proposes acoustically rated trickle ventilators in all dwellings and with a higher glazing specification for dwellings on the southern boundary close to the new football training pitches.

As indicated earlier in the report, the Council's Public Health and Protection Team have now accepted the location of the primary school and it will be important to ensure that there are a number of mitigation measures built into the design of the school building and its layout. The Noise Assessment indicates that ambient noise levels at the primary school would be too high to put natural ventilation and, therefore, the school would need to be mechanically ventilated to achieve the relevant internal noise levels. Noise mitigation around the school playing field would reduce the external noise levels but noise levels in the middle of the playing field would still exceed the guideline value. As indicated by the Public Health and Protection Team, the only area with external ambient noise levels suitable for outdoor teaching would be to the south of the school building and this is proposed in the indicative layout for the school site.

Whilst the ES Noise Assessment considers that for the existing properties along the Old Shoreham Road (A27) the increase in noise level is no more than 0.2dB(A) compared with the future level of traffic that is expected to occur without the proposed development. Given the small noise increase resulting from the proposed development, the Acoustic Consultant considers that this has to be balanced against the benefits of the development including the provision of several hundred new homes. It is also submitted that the provision of a new low noise surface along the trunk road in this location would provide a noise benefit to the existing properties and, therefore, there would still be a net benefit once the NMF development has been implemented.

Notwithstanding the above comments, the Council's Public Health and Protection Team is concerned about increased noise to properties along the A27, particularly as both the applicant's improvement scheme for the A27/Grinstead Lane junction and the Highways England scheme would bring traffic closer to existing dwellings. For the applicant's improvement scheme on the eastern approach to the roundabout, a dedicated left hand turn would be 2.3 metres closer to the existing properties and for alterations to the westbound exit for Grinstead Lane, the road would be approximately 1 metre closer at its closest point. Ideally, the Public Health and Protection Team would prefer to see a close boarded fence running at least from Manor Way to the roundabout to provide some acoustic protection to properties fronting onto the service road on the south side of the A27. In response, the applicants have indicated that Highways England has rejected this suggestion on the basis of cost and maintenance but they agreed instead a low noise road surface. Following this, the applicants' noise consultants met your Officers and explained that,

- There is limited room for any such fence
- Fence would have limited noise reduction value due to gaps to gain access for provision of access
- It would be visually intrusive in the street scene as you travel along the A27
- It would detrimentally impact on the outlook of residents who may well have significant objections for this reason
- Ownership of the slip road is unknown and potentially under different owners
- The proposal does not form part of the application and would need permission in its own right

Whilst, the Public Health and Regulations team (PH&R) recognise the above difficulties, they consider at a minimum low noise road surfacing should be used and it is hoped that

with the wider RIS Improvement Scheme, further acoustic protection measures could be investigated. As this scheme would require further design work and a planning application, there is scope for further dialogue with HE. As far as the applicant's improvement scheme is concerned, PH&R team considered that as a minimum, a low noise surface should be employed and during the detailed discussions under any S278 agreement other protection should be investigated.

As far as the Highways England scheme is concerned, further design work is necessary and it is anticipated that the scope to include additional noise mitigation could be secured as part of the design evolution of the wider A27 improvement scheme.

Drainage and Ecology

Drainage Strategy

As indicated earlier a key consideration in relation to this development is being able to demonstrate that an acceptable drainage strategy can be achieved to ensure that new properties are free from flooding and the development does not increase flood risk to existing development. The site is in Flood Zone 3 and the submitted Flood Risk Assessment (FRA) has been scrutinised over several months.

The site is part of the Adur floodplain albeit not a functional flood plain in view of the River defences currently being improved by the Adur Tidal Walls scheme. The concern of residents in the Manor Way area is acknowledged in light of the flooding that these properties have experienced particularly in 2012/13. This flooding has been compounded by surface water inundating the foul drainage network and causing foul water to flood a number of homes. As indicated by the Councils Engineers improvements to the foul sewer network in the Manor Close/Way area have been undertaken but not fully completed.

The drainage solution for both surface and foul water is not, therefore, straightforward and after several months the applicants have been able to convince the relevant flood authorities and the Councils Engineers that the solution is robust and will not increase flood risk to existing residents. The solution is, however, expensive and has added to the overall infrastructure costs.

Surface and Ground Water Disposal

To monitor groundwater levels and flows of surface water and greenfield run-off from the site, 62 monitoring stations across the site were installed in 2016 and continuous monitoring has been undertaken since. Whilst we are experiencing an exceptionally dry period over the period it has reflected average rainfall levels.

As described previously, essentially the drainage strategy proposes to widen the existing watercourses and, where necessary, create a new watercourse along the northern boundary of the NMF site. The new watercourse would connect to the existing watercourse which flows along the northern boundary of the airport and also drains the groundwater emerging from the spring known as Honeymans Hole to the northern outfall

on the River Adur. A section of the new watercourse would be in a culvert under the IKEA service road.

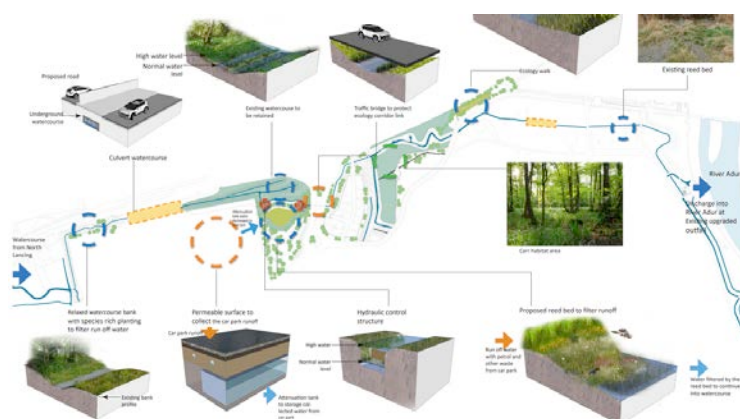
The new watercourse would effectively flow along the spring line on the south side of Old Shoreham Road relieving the pressure of groundwater as it emerges, effectively acting as a cut off drain and preventing flooding from groundwater over the site. The northern watercourse will also carry:

- all groundwater entering Lancing ditches from the Manor Way catchment area;
- all surface water discharge from the Manor Way catchment and the adjacent section of the A27;
- all surface water discharge from IKEA and school sites.

The culvert beneath the northern section of Mash Barn Lane is being replaced with a larger box culvert which will remove any restriction from the Manor Way catchment, thus improving significantly the capacity of the site to take flows from Manor Way. Whilst, the Councils Engineers and the Lead Flood Authority consider this would address (and potentially improve flood risk to these properties) these will not completely solve flood issues for these properties as there is an existing restricted culvert under Manor Close, however, this is upstream from the site and beyond the applicants control.

The northern outflow will discharge into the River Adur by way of a pumping station which will also take surface water from the commercial development. Dual separate electrical supplies and three pumps, only two which would operate at high tide. This is also designed so that the three pumps could operate simultaneously in the event of a major storm event. In the unlikely event of both electricity supplies failing then there is an emergency backup generator.

The existing northern outfall is tide locked for six hours in every tide cycle and, therefore, by pumping the discharge over the new tidal wall during high tide, a continuous outlet is formed which will create additional capacity in the drainage system. An extract from the DAS explaining the proposed northern watercourse is included below:



The diversion of these flows from Lancing ditches into the northern watercourse and into the River creates additional capacity in the downstream watercourses leading to the southern outflow by the Dogs Trust. The flows from these southern ditches through the housing and Country Park would be less than the current flows being measured. It is for

this reason the Councils Engineer believes the scheme offers benefits both up and downstream.

In view of the level of public anxiety about flooding issues the Council jointly commissioned, with the Lead Flood Authority, an independent Consultant to review the submitted FRA. Following the initial review, a number of technical issues and questions were raised and answered by the applicants' Consultants. One of the main concerns related to whether sufficient modelling had been undertaken to assess the full extent of surface/ground water coming from the Downs. After joint site visits and a review of the calculations and modelling the Councils Consultants accepted the applicant's conclusions and has agreed that the scheme would not increase flood risk to adjoining residents.

There has been an ongoing discussion between the Council, Lead Flood Authority and the applicants about the use of soakaways, permeable surfacing and the scheme's compliance with the requirement to deliver a Sustainable Urban Drainage system (SUD's). The Councils Engineers accept the position that soakaways would not work on the filled land and also raise concern that increasing the permeability of the site may increase the potential for ground water issues off site. Whilst, there may be scope to use soakaways for the land west of Mash Barn Lane (not the subject of infilling) this would need to be subject to further testing which can be secured by condition.

In relation to the phasing of works, this has also been the subject of detailed discussions – primarily what level of development could be occupied prior to the provision of the full drainage solution (including the pumping station). The concern is that development may start on phase 1 and, for whatever reason, the development stops half way through without an adequate drainage solution being delivered. At present, it is considered that there is scope to allow phase 1 (approx. 124 dwellings) with the alterations to the Mash Barn Lane culvert, but not the completion of the northern watercourse and pumping station. This approach is supported by the Councils Engineer as there would be sufficient storage capacity in the southern ditches. This matter can be covered by appropriately worded planning conditions.

Problems in the past have been partly due to poor maintenance of the watercourse system. The lead Flood Authority and the Council's Engineers recognise that since B&HAFC/NMF Ltd has owned the site, maintenance has improved significantly. However, it will be important that suitable safeguards are in place to ensure that the drainage solution is properly maintained at all times in the future. Of particular concern will be the maintenance of the pumps and 24-hour cover in the event of a storm event or power failure.

The proposal is for a Management Company to be formed with the majority shareholders being B&HAFC, Cala and IKEA and this does provide some greater security than is normally the case when often residential developers pass on maintenance costs directly onto new residents. The presence of B&HAFC on site is particularly important as the Club has indicated that it would be able to react on a 24-hour basis and would be regularly monitoring the maintenance and performance of the surface water drainage solution for the site. Your Officers are currently discussing the future maintenance issues with the Club and how best to deal with these matters in the proposed s106 agreement to provide long term security for new and existing residents.

Foul Water Disposal

In view of the capacity issues for the foul sewer network, the applicants have had to explore a number of alternative solutions to the problem. Initially, it was felt that a private treatment plant was required. However, Southern Water would only agree to this if all other alternatives were exhausted. The solution to create a new connection to the existing network has been agreed with Southern Water and would address capacity concerns. This does require the demolition of a dwelling (No. 37 Barfield Park) and residents were concerned about the disruption this would cause to traffic and disturbance during the construction of the new sewer run which would lead under the road before connecting the existing system under the railway line. However, the applicants have indicated that this sewer can be tunnel bored thereby reducing the level of disturbance.

Ecology

The Council has a duty under the NERC Act 2006 to have regard to the purpose of conserving biodiversity, including restoring and enhancing species, populations and habitats, as well as protecting them. In addition, the NPPF (para. 109) also requires that 'the planning system should contribute to and enhance the natural and local environment by 'minimising impacts on biodiversity and providing net gains in biodiversity where possible.' The NPPF sets out principles that the LPAs should seek to apply when determining planning applications to conserve and enhance biodiversity. These include:

- (i) encouraging opportunities to incorporate biodiversity in and around developments and,
- (ii) refusing planning permission that would cause loss/deterioration of irreplaceable habitats unless '... the need for, and the benefits of, the development in that location clearly outweigh the loss' (see para. 118).

The key focus of discussions with the applicants' Ecologist has been to ensure that the development seeks to provide for a net gain in biodiversity on the site and any harm is adequately mitigated. The chapter on Ecology was updated and replaced with the December changes to the ES. The ES concludes that,

The sensitive design of the Scheme and the comprehensive nature of the package of mitigation measures will ensure that there are no significant residual effects on any key or protected ecological receptors within the Zone of Influence. There would be no residual effects of significance.

However, concerns have been raised by Natural England (NE) about the impact of the development on the saltmarsh/SSSI and Sussex Wildlife Trust has been concerned about various aspects of the scheme including when habitat surveys were undertaken. The applicants' Ecologist has been working closely with statutory consultees particularly the EA and NE in connection with the possible adverse effects on the intertidal mudflats and salt marsh as a result of the new pumping station on the bank of the Adur. It is hoped that the works for the construction of the pumping station can be undertaken at the same time as the Adur Tidal Walls scheme to reduce the ecological impact on the SSSI. However, NE's principal concern has been about the loss of saltmarsh.

The revised application and ES includes compensatory habitat, approximately 840 sqm to replace the 770sqm lost as a result of the works. Whilst, NE confirms that this is acceptable it expressed concern about an area of saltmarsh (128 sqm) that might be affected by freshwater discharging from the proposed spillway. To mitigate this possible adverse effect, a shallow receptor ditch is proposed to divert the freshwater from the more sensitive saltmarsh area, together with the creation of a small balancing pond. If this works effectively the development may not impact on this additional area of saltmarsh but if it does NE would require an additional area of compensatory habitat. It is proposed to require this by planning condition, however, various discussions are ongoing with NE to see how this can best be secured by condition.

In response to the concerns of Sussex Wildlife Trust the applicants' Ecologist has responded on a number of the points made.

Bat Surveys

The applicant's ecologist states that rather than rely on generic guidance on bat surveys a pragmatic approach was taken following the initial phase 1 habitat survey which indicated a lack of appropriate vegetation for bat foraging. As a result, it is submitted that foraging was confined to the most favourable bat foraging and roosting habitat areas. Whilst the applicants accept that the bat surveys were undertaken during the latter part of the year, the limited bat activity noted in areas that would be regarded as prime foraging habitat, e.g. the watercourses and tree-lined edges, supports his contention that New Monks Farm almost entirely consists of disturbed secondary habitats that lack sufficient insect biomass to attract bat foraging. This conclusion is supported by the County Ecologist (see WSCC consultation response).

Barn Owls

Following the report of a Barn Owl record at New Monks Farm during 2017, the applicants' Ecologist undertook a Desk Study from Sussex Biodiversity Records Centre (3rd May 2018) to re-assess the background data on this species. This identified that the only additional record from those considered in the EIA was of a Barn Owl seen near to the 'open-sided area of Daniels Barn' on 14th August 2017. It is also submitted that this Desk Study coincided with a single Barn Owl being flushed out of scrub some 400m from Daniels Barn during a morning walkover in early May 2018. Further surveys have been undertaken and on the 21st May a single Barn Owl was noted hunting at the southern end of the site, immediately east of the Lancing Training Ground (despite pitches being floodlit and in use). The applicants' Ecologist concludes that,

'Barn Owl clearly remains a species to be aware of during the proposed building demolition, tree felling and scrub clearance work within New Monks Farm – and these features would require prior checking by the Project Ecologist. Given the proximity and future interconnectedness of the proposed new Country Park to Shoreham Airport and to open space to the south, Barn Owl will remain a potential future colonist. The re-designed ditch network and wildflower grassland stands can provide foraging habitat in the medium-to long-term and targeted nest boxes can improve the local nesting/roosting opportunities for this species.'

The applicants' Ecologist accepts that the development would result in the significant loss of potential habitat area for ground-nesting birds such as Skylark. However, it is stated that as this cannot be mitigated they have focused the biodiversity enhancements towards the new range of habitats that would be delivered. It is suggested that new nest box habitat will target the retained/new scrub edge and watercourse habitats, with the aim of enhancing breeding success. The Trust also questions reference to the provision of an Otter holt, however, it is submitted that this feature is included so that it could be used at some time in the future. It is submitted that the excellent availability of fish along the Adur would make this a prime location for future recolonization. The provision is supported and the recent success of introducing Otters on the River Arun supports such provision.

In terms of balancing public access with ecological enhancements and disturbance to wildlife raised as an issue by the Trust it is submitted that,

'The eastern side of the Country Park, including the length of new drainage ditch at the foot of the new flood defence bund, has purposefully been set-aside with no access provision in order to encourage a quieter, least disturbed area where ground-nesting birds and shy waterbirds can avoid pedestrians and their dogs. Clearly identifiable and well-signed footpaths will help to concentrate pedestrian/dog movements within the Country Park, especially during the wetter months of the year.'

Other concerns raised by Sussex Wildlife Trust have been addressed by the applicants' Ecologist and these have been passed onto the Trust for comment. Following lengthy discussions between the EA and the consultation response from the WSCC Ecologist, your Officers are satisfied that the scheme does provide adequate mitigation for any adverse impacts on ecology and biodiversity. In the context of the need for this important strategic housing and employment allocation, it is submitted that every effort has been taken to provide ecological and biodiversity enhancements.

Sustainability

The Sussex Wildlife Trust and others have questioned the level of sustainable design features built into the proposed scheme. The suggestions of solar panels, green walls and roofs are all sensible suggestions and have been the subject of discussions with the applicants. Whilst there has been criticism of the green roof the increase in its size to a minimum of 4,500 sqm is significant in terms of reducing the visual impact but also restricting rainwater run-off and increasing biodiversity.

Local Plan policies 18 and 19 encourage sustainable design and set minimum standards for water efficiency (110 litres/person/day) as the area is water stressed and BREEM very good for all commercial development. Both of these standards will be met and planning conditions can ensure compliance. For all new residential development (major developments) would be expected to incorporate renewable/low carbon energy production equipment to provide at least 10% of predicted energy requirements.

Following discussions with Cala Homes they are prepared to meet this minimum standard and the layout lends itself to this with a number of south facing dwellings. Cala has also indicated that its air tightness standards will be of a greater standard than

required by Building Control and it would implement improved thermal detailing and insulation standards. Compliance with Local Plan policies can therefore be achieved.

In addition, it is submitted that IKEA operates a sustainability code which ensures that all its activities have the environment and sustainability at the forefront of its business. In accordance with this code, it is submitted that the store will minimise the use of resources by utilising as much renewable, reclaimed and recyclable material as possible in the products that it sells. In terms of climate change, IKEA has implemented a number of initiatives within its stores to reduce their carbon emissions and other environmental impacts with the target of improving energy efficiency by 25% compared to 2005 levels.

The DAS identifies the other sustainable design measures that would be incorporated into the store design,

- Installing roof mounted solar panels
- Installing a ground source heat pump system
- Installing a rainwater harvesting system to be used for grey water
- Providing charging points for electric vehicles
- Using LED lighting throughout
- Using effective temperature control systems
- Sustainably sourcing timber
- Tree planting
- Voltage optimisation equipment to maximise power efficiency
- Maximising the efficiency of the building energy management system (BEMS) to reduce the amount of time certain lights, power circuits and heating and cooling plant are in use
- The inclusion of integrated recycling facilities which has enabled IKEA to recycle up to 95% of all its waste
- Re-use and recycling of customers' old furniture.
- As part of the air quality discussions, IKEA has also agreed to a low emissions delivery vehicle.

Provision of supporting Infrastructure (s106)

As stated previously the Infrastructure Delivery Plan identified the key improvements necessary to support the strategic allocation at New Monks Farm. Whilst there have been concerns about the level of infrastructure necessary to support the residential development, the Council engaged with key infrastructure providers to assess what improved facilities would be required and the consultation responses reflect the requirements of the IDP.

The scheme viability even with IKEA and a public subsidy is below the level that most developers would contemplate proceeding and this reflects the desire of B&HAFC to have some control over development to the north of its circa £30 million training centre. However, this has impacted on the delivery of 75% rented accommodation and the County Council request for a financial contribution as well as land (as required by the adopted IDP). Discussions are ongoing with the County Council in particular around the value of the school land offered (as it is larger than the one form entry (1FE) currently needed to serve the development) and Members will be updated at the meeting.

The viability of the scheme dictates that it would be very difficult to increase the amount of development contributions without making the scheme unviable and this makes a difficult choice in terms of prioritising contributions for different infrastructure providers – effectively trying to assess the relative merits of a health contribution against education for instance. Attached as **Appendix 8** are the main s106 Heads of Terms identifying the various infrastructure contributions, highway works and affordable housing requirements.

Landscape Character and Visual Impact

In preparing the Local Plan due regard was given to the sensitive landscape and the proximity of the National Park and heritage assets and safeguards were incorporated into the Plan to minimize the extent of any harm caused. In balancing viability considerations and the ability to deliver new homes and jobs, the impact on the landscape has to be carefully assessed.

Importantly Section 11A(2) of the National Parks and Access to the Countryside Act 1949 requires that *‘in exercising or performing any functions in relation to, or so as to effect land’* in National Parks relevant authorities *‘shall have regard to their purposes.’* This duty applies to all authorities and includes authorities considering developments such as this that have an impact on the setting of landscape designated land. The purposes laid down by the Environment Act 1995 are to conserve and enhance the natural beauty, wildlife and cultural heritage of the area and to promote opportunities for understanding and enjoyment by the public of the area’s special qualities’.

Policy 5 in the adopted Adur Local Plan also requires that the development *‘must respect the landscape of the surrounding countryside and the South Downs National Park.’*

As indicated previously the indicative boundary for the built-up area did not follow any existing landscape feature on the ground but was based on an assumed density calculation for the housing and employment generating uses and to reflect the transition in visibility and sensitivity of the landscape from east to west. In this respect, the indicative boundary was influenced by areas that are visible in the highly sensitive elevated views from the open access land at Lancing Ring, from Hoe Court and Mill Hill in the SDNP. An assessment of these views shows that the indicative built up area boundary broadly separates the areas that are more visible from these sensitive SDNP viewpoints (to the east of the indicative line) and areas that are less visible (to the west).

The indicative built up area boundary was aligned, therefore, to minimise predicted impacts on the sensitive views from the SDNP and so a key consideration is the extent to which the proposed development can be expected to cause harm to the landscape setting of the SDNP, a protected landscape which is of national importance for scenic beauty. The alignment of the BUAB was also influenced by analysis of landscape character and views across the Lancing-Shoreham Local Green Gap (LGG) with the objective of defining an area of built development which would minimise the perceived coalescence of settlements within a part of the coastal plain which is so heavily urbanised that the remaining gaps provide critically important visual breaks which contribute a valuable sense of identity and place.

The site is located to the east of Lancing and west of the River Adur. This landscape is coastal and located alongside the Adur estuary. By virtue of this location, the landscape is naturally low-lying, the vast majority of which lies within Flood Zone 3. This location creates the foundation of the landscape's character as a coastal floodplain – it lies within the National Character Area South Coast Plain and Hampshire Lowlands. This landscape is one part of a series of remnants of the huge coastal floodplain encroached by expanding settlements relatively recently - over the past 90 years. This has left a series of landscape 'gaps' which characterise this stretch of coastline as a succession of 'windows' with views to the sea from the South Downs. As identified in the West Sussex County Council Landscape Character Appraisal, this site is one of these coastal gaps. As stated by the SDNP, the site lies within a complex landscape displaying significant time-depth.

Landscape and Visual Impact Assessment (LVIA)

Given the landscape sensitivity of this site the Council has employed an external Landscape Consultant to provide advice on the landscape impacts of the development and the Consultant has worked closely with the National Park Landscape Officer. The Council's Consultant raised a number of concerns about the Landscape and Visual Impact Assessment (LVIA) submitted with the original ES. In particular, that there were two fundamental problems with the original scoping stage of the LVIA - an oversimplification and misleading approach to identifying relevant landscape receptors and the selection of viewpoints which did not cover the likely significant visual effects of the proposed development. In addition, there was criticism that the LVIA had used poor quality photographs and no photomontages were shown from key viewpoints. Overall it was considered that the LVIA had not fully assessed the impacts of the individual components of the scheme but also the cumulative impact of the proposed development on the landscape, the green gap and the setting of the National Park nor the cumulative impact with the development proposed at Shoreham Airport.

As originally submitted the LVIA relied heavily on the Country Park to mitigate impact and there was little attempt to mitigate the impact of the building through the design of the building. Reliance was entirely on existing and proposed landscaping.

The applicants Landscape Consultants have submitted a further LVIA and a more recent addendum to react to criticism of the overall landscape assessment and assesses the amended plans. A series of photomontages were also submitted from key viewpoints within the Park to help assess the wider impact of the development. The latest LVIA addendum states that whilst the reported impacts/effects of the LVIA have not changed the mitigation proposals will help reduce visual effects. It states that,

Following further visual studies and assessment of the visual effects of the IKEA development the mitigation proposals include:

- Neutral colour fins added to the northern façade with decreasing spacing as they move up the building to reduce visual effects from elevated viewpoints and specifically from Bridleway 2065 and Hoe Court Farm.
- Tree planting at ground level between IKEA building and A27 carriageway will filter views at ground level.

- Redesigned carpark reducing the linear lengths of parking rows and inclusion of additional planting to the northern boundary and groups of trees within the parking area help screen views from the north and east at elevated and ground level viewpoint.
- Car park designed to complement the area to the east to provide mitigation from elevated view point to the east specifically Mill Hill Nature Reserve.

These have now been reviewed by both the Park and the Councils Landscape Consultant and the following sub-sections analyse the relative harm, in landscape and visual terms, caused by the extension of the proposed development beyond the indicative BUAB. The following questions are assessed in the following section of the report.

- *Does the proposed development cause harm to the landscape setting of the SDNP?*
- *Does the development increase the perceived risk of coalescence between Lancing and Shoreham-by-Sea?*
- *the predicted cumulative landscape and visual effects of the New Monks Farm and Shoreham Airport developments.*
- *How effective is the level of mitigation proposed?*

Does the development cause harm to the landscape setting of the SDNP?

Due to the overall size of the IKEA store, its use of primary colours and extent of car parking required to serve the store, the development would have an adverse impact on the landscape and setting of the National Park.

This is accepted by the applicants latest LVIA with mitigation and which concludes that the development would still have a 'major adverse' effect from the following key viewpoints - Public Bridleway No. 2065 between Sussex Pad and Hoe Court and from the bridleway at Hoe Court. The original LVIA also identified a 'major adverse' effect from the bridlepath at Lancing College and from Shoreham Toll Bridge. From Mill Hill car park and the west bank of the Adur the latest LVIA states that the development would have a 'moderate adverse' effect.

There is little doubt that the in certain views to and from the National Park the development would have a major adverse impact. It was disappointing therefore that the scheme as originally submitted did not seek to mitigate the 'major adverse' visual effects.

At an early stage in the determination of the application, the National Park's Landscape Architect and the Council's Landscape Architect set out some of the key landscape impacts of the development and how the development could seek to mitigate some of these impacts. In summary, the applicants were advised that the overall scale, appearance and form of the commercial element and associated parking and lighting would cause significant harm to landscape character and in views to and from the National Park, including heritage assets which contribute to this character.

A key focus of attention has been the concerns about elevated views of the commercial development from Hoe Court and Mill Hill, as well as the views of the large retail building along the A27. Of significance has been the use of bright corporate colours and the visual impact of the north and north-eastern elevation (see SDNP original Consultation

response) and the level of illumination of the car park. A sketch showing some of the proposed mitigation measures suggested is attached as **Appendix 6**.

The Council's Consultant indicated that there was scope to try and integrate the IKEA development with extensive belts of native trees, which reinforce the enclosed 'foot of the Downs' landscape along the break of the slope (broadly the A27) in contrast with the relatively open coastal plain landscape of Shoreham Airport and the majority of the new Country Park. Given the scale of the development and viability issues it has been acknowledged that there would be a need for some compromise; in that the A27 corridor tree belts would need to extend to the south of the IKEA complex in order to integrate the large building.

It is accepted that the revisions to the proposals have now provided additional mitigation. There are now layered belts of trees within and along the northern edge of the car park. The Council's Landscape Consultant considers that there is scope for some further tree planting along the southern edge of the link road and car park for the country park and, ideally, within the new roundabouts. In response, the applicant's Landscape Consultant has expressed some concern about introducing additional planting south of the internal road, specifically as there has been a desire to keep the open landscape of the Country Park. However, the option of planting within the new roundabout is being explored. Highways England may raise concerns about the main A27 roundabout on the basis that it might compromise forward visibility but planting can be incorporated into the two internal roundabouts and some screening of the road and small Country Park Car Park would be beneficial.

The landscape changes, reduction in height, introduction of louvres and the two areas of green roof introduced do help to mitigate longer distance and elevated views. Whether these changes go far enough to help mitigate the overall scale and impact of the IKEA store from the various key viewpoints is discussed below.

Northward views towards the SDNP from within the Lancing-Shoreham LGG

The original LVIA did not consider views from the train to the south and views across from the River Adur footpath have been of concern. The Adur Tidal Walls Scheme will raise the footpath by approximately one metre thereby further elevating views across the airport/floodplain. In response, the applicant's Landscape Consultants undertook further analysis of views from the south and demonstrated that although the commercial store would be prominent after Phase I, it would be 'screened' by later phases of the residential development. Nevertheless, the views across from the River Adur would have a significant adverse impact with the blue and yellow facades being prominent against the backdrop of a relatively wooded part of the Downs. The Council's Landscape Consultant considers that given the significance of the nationally important landscape setting this harm could be mitigated by changing the colour of the east elevation to grey and, in particular, removing the yellow part of the façade. This is considered in more detail later in the report.

Visibility from the SDNP

The views considered by the LVIA and DAS are criticised by the Council's Consultants as there are other views which demonstrate, in some respects, that the development would have a greater landscape impact. The view from Mill Hill, taken by the lower car park, is less relevant than views higher up Mill Hill where there is a wider view of the development site. Nevertheless, these views have been extensively assessed by your Officers as part of the scheme appraisal.

The residential development falls largely within the indicative built up area boundary and would be perceived as an extension of Lancing. Whilst it would have some negative impact on the landscape, the SDNP does not object and the economic and community benefits were recognised through the preparation of the Local Plan. As indicated previously, the density of housing has been reduced in response to concerns about the visual impact of the south-eastern section of housing, particularly from Lancing Ring. The Council's Landscape Consultant considers that a further reduction in housing numbers and additional planting could help to further reduce any harm. It is considered that these further refinements could be secured at the reserved matters stage for the later phases of the residential scheme. The lower density now proposed does provide for pockets of landscaping to help soften the edge of the development.

Analysis of the views from the relevant elevated SDNP viewpoints suggests that the IKEA building would only be particularly prominent in the view from Mill Hill; in this view the IKEA building would be relatively small (as this is an elevated and distant view) but nevertheless prominent because of the bright blue/yellow colour of the facades. The applicant's photomontage for this viewpoint illustrates the issue and demonstrates that the adverse visual effect of the IKEA building would not be mitigated by tree planting; the building is just as prominent in the view after 15 years as it is at completion. The Council's Consultant feels that this is a significant and adverse negative visual effect particularly in the context of a national park landscape. However, it is suggested that this large building could be integrated to a reasonable and acceptable degree if it were a dark grey colour which blends with the dark colours of the surrounding trees in views from Mill Hill.

The loss of the corporate colours from the principal elevation is not acceptable to the occupier IKEA and the applicant's Landscape Consultant questions the extent of harm given the distance that the building would be viewed with the built-up area of Lancing as a backdrop. Nevertheless, some reduction in the bright yellow at higher level would help to lessen the impact. The SDNP has indicated that it has more concern about the impact of the car park lighting from this view and feels that a reduction in lighting (lux levels) and extending the louvres to part of the east elevation would provide further mitigation. The applicant has been requested to extend the louvres for a section of 22 metres along the east elevation and to consider a reduction in the use of yellow at high level on the building. This is considered important to mitigate elevated views to the north-eastern corner of the building and Members will be updated at the meeting.

Hoe Court and from the track to the east of Lancing Ring

From here, views show that only the upper part of the IKEA building and the rooftop would be visible from these viewpoints. The green roof and louvres on the northern façade of the

building which are now proposed, help to mitigate these impacts to an acceptable degree. However, the level of supporting information to demonstrate the appearance of these louvres is lacking as indicated previously and whilst a condition has been recommended it is hoped that further information will be available at the meeting.

Of particular importance, in reducing the visual impact of the IKEA building in views from Hoe Court and Lancing Ring is the existing mature trees along the northern side of the A27 and these trees are on land outside the ownership of the applicants. It is therefore recommended that this belt of trees is subject to a Tree Preservation Order (land within the Highway boundary and/or Lancing College).

The SDNP also supports the changes to this elevation although raise concern that the louvres leave a significant gap for signage which undermines the proposed mitigation. Your Officers agree and the applicant has been requested to amend this elevation accordingly.

As Sussex Wildlife Trust indicate it will be important that full details of the proposed green roof are submitted to ensure that any planting has appropriate height and contributes to biodiversity. As landscaping is a reserved matter, this can be addressed at the detailed stage. In view of the overall size of the building, it may appear that only a small amount of the green roof is proposed. However, the area indicated is approximately 4,500 sqm which is quite significant (to give this some context a standard football pitch would be 7,140sqm). There are some discrepancies between plans about the extent of the green roof and, therefore, a condition is composed to ensure a green roof shall be provided as a minimum of 4,500sqm.

Potential harm to the landscape of the Lancing - Shoreham-by-Sea Local Green Gap (LGG)

The analysis of the Lancing-Shoreham Local Green Gap (LGG) in the Adur Landscape Study Update (2016) demonstrated that all the area east of Mash Barn Lane contributes to the distinctive landscape settings and identities 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. The initial advice from the Consultants indicated two 'tests' to establish the degree of potential harm to the landscape of the Lancing-Shoreham LGG - the character of the approach to Lancing travelling westwards along the A27; and the way the New Monks Farm site is perceived within key cross-gap views from the south-east (the railway and the A259) and from the popular public right of way along the west bank of the River Adur. In addition, the SDNP Authority has raised the issue of lighting within the context of the SDNP as a Dark Night Skies reserve.

The character of the approach to Lancing as experienced in views from the A27 travelling westwards

The masterplan for the IKEA development and that of the residential development/country park has been now more carefully integrated and, with the revised layout of the IKEA car park and the addition of tree belts along the northern edge of the IKEA car park and within the car park, the gateway views from the A27 will be much improved. However, there

remains a need to clarify the treatment of the northern elevation of the IKEA building, which will be critically important in the view from the A27.

The current masterplan shows a densely-planted line of trees along this northern boundary of the site (between the A27 and the service road) and also a more formal row of trees on the south side on this service road. This is welcomed although there is still some concern that there are trees shown over the major drainage ditch (to the east and west of the service road). Given the importance of the proposed tree planting along this prominent frontage, the feasibility of this tree planting requires some clarification. Members will be updated at the meeting in connection with this matter.

The impact of the proposed development in key cross-gap views

The scheme has been amended to increase tree planting within the IKEA car park and the country park bordering the IKEA development. This has helped to integrate the development within the surrounding landscape context, reinforcing and extending the 'wooded' character of the transitional landscape at the foot of the Downs and contrasting this zone with the more open grasslands of the coastal plain (and airport). There are three viewpoints which can be used to 'test' the degree to which the proposed tree planting would mitigate the predicted visual effects:

- **View north-west from the west bank of the River Adur** - the photomontage from Viewpoint A demonstrates that the IKEA building would be prominent in this view. The bright yellow and blue façades contrast with the surrounding landscape and ensure that the building stands out. There would be a significant adverse impact on the quality and character of the LGG in the cross-gap views from the west bank of the River Adur
- **View north-west from trains** travelling across the Lancing-Shoreham LLG between Shoreham Airport and Old Salts Farm –The applicant's photomontage (Viewpoint F) is not the view from the train as it is taken from a point to the north of the train tracks but it can be used as a representative view which is likely to be similar to the view from the train. As indicated earlier, this demonstrates that the IKEA building would be prominent at completion, but screened by the new housing, when the full New Monks Farm development is complete. Again, it is the bright colour of the IKEA facades that ensure this building is prominent in this highly accessible cross-gap view.
- **View north-west from the A259** – The photomontage from Viewpoint E suggests that the New Monks Farm development would not be prominent in this view.

Impact of the proposed lighting scheme on the SDNP Dark Night Skies reserve

The SDNP considers that the proposals for lighting the IKEA complex would not be acceptable in the context of the SDNP because this would create a 'city-centre' level of light within a zone of transition to the core Dark Night Skies Reserve. Given that it would not be feasible to comply with the SDNPA's suggestion that the IKEA complex is moved to a different site further to the south and at a greater distance from the SDNP (for landscape and visual impact reasons) the only option available to the applicants would be to revise the lighting proposals for the commercial development. The applicants have agreed to reduce Lux levels, however, the extent to which Lux levels can be reduced would depend

on safety considerations. The applicants have indicated that all lighting would comply with dark night sky friendly fittings and have agreed to a condition to secure a reduction in Lux levels and that all illumination is switched off outside of hours of opening.

Predicted cumulative landscape and visual effects of the New Monks Farm and Shoreham Airport developments

The New Monks Farm and Shoreham Airport developments are closely linked from an economic perspective, as well as in terms of predicted landscape and visual effects (including impact on heritage assets). It is important that the cumulative landscape and visual effects are fully understood and considered in the master planning process for both developments.

There is concern therefore that the cumulative landscape and visual effects sections of both the New Monks Farm and Shoreham Airport LVIA's do not attempt to address the cumulative landscape and visual effects in a comprehensive manner. Both LVIA's contain the following statement - *At the time of this assessment no inter-project mitigation measures have been established as the Airport and New Monks Farm proposals have been developed independently* (eg Paragraph 13.8.33 in New Monks Farm LVIA).

The Council's Landscape Consultant does accept that there is a need to keep the task reasonable and proportionate, but comments that the LVIA Guidance places emphasis (paragraph 7.5) on common sense and a focus on the *likely significant effects Careful thinking through what significant cumulative landscape and visual effects are likely to be generated by the proposal*. Given the location of these two sites adjacent to a National Park, it is likely that there will be significant cumulative landscape effects on the setting of the South Downs National Park (SDNP).

The New Monks Farm LVIA avoids this issue by not assessing the landscape effects on the SDNP individually or cumulatively, although it does acknowledge that the cumulative visual effects would be significant (paragraphs 13.8.38). Nevertheless, the Council's Consultant considers that the mitigation of cumulative effects could be achieved by partnership working across both developments to ensure that tree planting along the northern parts of both sites merge along the foot of the Downs. The scope for doing this is straightforward as the applications are linked by the Joint Access Strategy. The inclusion of airport land as part of the drainage and access solution does allow for an extension of the woodland corridor along the A27.

How effective is the proposed Mitigation?

In view of the scale of development proposed, both at the airport and New Monks Farm it is accepted that there would be major adverse cumulative visual effects from Lancing Ring public right of way (along the east side of the open access land), Mill Hill and Hoe Court. However, the Council's Landscape Consultant concludes that the addition of the extended green roof to the IKEA building and the louvres on the northern elevation would result in significant reductions in the visual impact of the IKEA building in the views from Hoe Court and Lancing Ring and so will reduce the cumulative visual impacts from these two viewpoints to an acceptable level. However, the Council's Consultant concludes that there remains a significant and adverse cumulative visual effect from Mill Hill and she suggests

that this cannot be mitigated unless the colour of the IKEA building east elevation is changed to a more muted tone.

From the above assessment of views and negotiations over several months, the level of mitigation to address the adverse impact of the development from various viewpoints has improved. Nevertheless, even with mitigation in place, the IKEA building would be a large and prominent structure and the applicants revised LVIA still concludes that it would have a major adverse impact from two main viewpoints.

The applicants are currently investigating the implications of extending the louvres to return onto the east elevation and investigate the scope for reducing the extent of the bright yellow for the top section of the building. Whilst the Council's Landscape Consultant's request for a different colour to be used on the east elevation is appreciated in landscape terms, the applicants have expressed concern that this has to be balanced by the commercial needs of the operator and the desire to reflect its corporate colours. At Reading where the proposed IKEA was adjacent to the Area of Outstanding Natural Beauty (AONB), IKEA agreed to a dark grey colour for the elevation facing the AONB. Whilst, this was a secondary elevation, the effect demonstrates how a neutral colour can reduce the overall visual impact of the building. The difference in this instance is that the east is the primary frontage with the secondary frontages being south, west and north.

Members will be updated at the meeting regarding these issues. Given the overall length of this eastern elevation, your Officers feel that there is some of scope to reduce the extent of corporate colours albeit this is a sensitive issue for the intended occupier.

The development would cause harm to the setting of the National Park from certain viewpoints notably Mill Hill, albeit a distant view as noted previously. In terms of the duty placed on authorities to have regard to the objectives of the Park, it is important that this is given due weight in the planning balance.

The applicants have been requested to provide further information in relation to the louvres and to address the concerns about the visual impact of the development when viewed from Mill Hill. Nevertheless, the location demands further compromises and this is also reflected in the assessment of the development's impact on heritage assets.

Impact on Heritage Assets

Members are reminded of the duty placed on Planning Authorities by the Planning Acts to have special regard to the desirability of preserving the setting of listed buildings. The NPPF also provides clear guidance on assessing the impact of development on heritage assets and the relevant paragraphs are set out below.

Paragraph 129 requires local planning authorities to identify and assess the particular significance of any heritage asset that may be affected by a proposal. This assessment should be taken into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservations and any aspect of the proposal. When considering the impact of a proposed development on the significance of designated heritage assets, paragraph 132, states that *"great weight should be given to the asset's conservation. The more important the asset the greater the*

weight should be". NPPF states that a heritage asset's significance can be harmed or lost through development within its setting, and any harm or loss should require clear and convincing justification.

Paragraph 133 states that where a proposed development will lead to 'substantial harm' to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- the nature of the heritage asset prevents all reasonable uses of the site
- no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation
- conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible
- the harm or loss is outweighed by the benefit of bringing the site back into use

Paragraph 134 states that where a proposal will lead to 'less than substantial harm' to the significance of a designated heritage asset, such harm should be weighed against the public benefits of the proposal, including its optimum viable use. Paragraph 135 states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Heritage Assets – Wider Landscape

The Council, in preparing the Adur Local Plan, commissioned a heritage Statement (ACTA Landscape and Heritage Consultants) and the applicants have also submitted a Heritage Assessment as part of the ES. These documents highlight the significance of the Airport as one of the centres of early British aviation and is the only airport still active. The listing of the main terminal Grade II* and the adjoining hanger reflect the importance of the Airport's expansion in the 1930s and the significance of the Airport in the development of civil aviation. The important role of the airfield during the second world war is also highlighted and the Dome trainer and Blister hanger are important examples of military training and Historic England comments that they are of national importance.

The Airport and the previously designated Strategic Gap provide the open landscape setting to a number of important heritage assets, Lancing College (listed Grade I); Shoreham Airport Terminal Building (listed Grade II*); the pedestrian timber toll bridge (listed Grade II*) and the Gunnery Training Dome (Scheduled Ancient Monument). Historic England comment that the setting of these assets overlaps and is extensive because of the topography with the elevated site of Lancing College visible from the lower, open setting of the airfield which is also an important element in its 'aesthetic significance'. There are also unlisted heritage assets within the site comprising two WWII pillboxes, Daniel's Barn and the Blister Hangar. The application site also contains medieval saltern mounds and associated remains indicative of early and late-medieval salt making industry.

Historic England (HE) has expressed regret about the scale of development proposed in that it would encroach on the gap between historic settlements, not only the setting of Old Shoreham Conservation Area but also the setting and significance of Lancing College and the Airport terminal building and municipal hanger. Although Historic England acknowledges that development is largely concentrated in the lower quality areas and measures have been taken to mitigate its visual impact, it considers the development an unwelcome precedent.

The harm identified by Historic England is primarily to the setting of Lancing College and the Airport terminal building by the proposed IKEA and pumping station. The harm is described by Historic England in the following paragraph,

“This harm is the result of what will be a very noticeable change in character to part of the setting of these assets caused by a large building of commercial character that will be very visible in important views from the airfield looking north. The open topography and relationship of the airfield to its setting is best appreciated from outside the terminal building and contributes to its significance because it allows an understanding of the approach to the airfield between the South Downs. It is also from this location that some of the best panoramic views are obtained of Lancing College which visually dominates from its elevated position. The introduction of a building of the scale, height and appearance required by IKEA will therefore be a noticeable visual distraction to an otherwise largely green and open setting.”

Historic England recognises the strengthening of landscape buffers and a considered approach to lighting would mean that activity would not be *‘readily appreciated and that, over time, the visual impact at low level would be further mitigated.’* Although the further advice from HE is awaited, the additional mitigation put forward to reduce the harm to heritage assets includes:

- breaking down the scale of the building through colour i.e. by using a less assertive tone of blue for the upper section of the building or a more neutral grey or green based colour
- Signage and lighting at high level should be avoided.

It is anticipated that the additional planting within the car park and on the south and east of the IKEA store would help to mitigate some of the adverse effect identified by Historic England. To the south of the store and car park, in particular the proposed 3 metre high earth bund with the proposed semi-mature planting would help to reduce the visual impact when viewed from the listed terminal building. Avoiding lighting of advertisements at high level would also assist in reducing the extent of visual impact (this would be covered by other legislation – the Advertisement regulations). However, it would be important to restrict any external lighting high up on the IKEA building.

The ES Heritage Chapter considers that as Lancing Chapel is elevated and circa 710 metres away from the development it identifies that the magnitude of impact is only neutral. However, it does not appear that the appraisal assessed the inter-visibility between the airport terminal and Lancing Chapel.

Historic England considers that the harm is less than substantial and therefore there is a requirement to assess whether the wider public benefits outweigh this harm (to be assessed in the following Planning Balance section of the report).

Pumping Station

In terms of the pumping station, it is accepted that the size of the pumping station will represent a significant structure and a considerable change to the character of the river bank. Historic England considers that it would sever the connection between the Old Shoreham Bridge and the airfield (although historically this connection is more recent) and the allocation of employment land at the airport would also have a similar impact (the additional floorspace proposed at the Airport would increase the level of severance).

It is not possible to relocate the pumping station without impacting on the overall drainage strategy and the applicants' use of a green roof and timber cladding etc would help to soften its appearance, although it is recognised that some harm is caused to the setting of the Conservation Area. The level of harm is identified as less than substantial and therefore the acceptability of the proposal rests on the overall public benefits of the development. As the pumping station is a vital component of the submitted drainage solution it is considered that the overall benefits to flood risk and the delivery of much needed housing would override the harm to the setting of the Conservation Area particularly as the scheme attempts to mitigate its appearance.

Dome Trainer

The applicants were sensitive to the possible adverse impacts of the highway works on the setting of the Dome Trainer, Blister hanger and airport road and engaged in pre-application discussions with Historic England. It is relevant that the gunnery training dome was not part of a planned military airfield but a piecemeal addition to a temporary wartime airfield. Its setting on the airfield does contribute to its heritage significance but as stated by Historic England, *it was 'secondary and peripheral to the main business of the airfield'*.

The proposed A27 roundabout and associated access roads to serve both the IKEA, residential and commercial development at the airfield would affect the setting of the Dome Trainer. In this respect, the road would be 25 metres from the scheduled monument and potentially isolate it from the Airport (its historic setting). The unlisted blister hanger and original airfield road would also disappear.

However, the visual connection between the Dome and the airfield would remain and any harm has to be balanced/offset by other improvements to its setting and accessibility. This is recognised by the County Council's Archeologist and Historic England. Notable improvements relate to removing raised grounds that cause flooding, clearance of vegetation and the significant benefits of linking this to the Country park and installing external information panels. The submission of a Conservation Management Plan (which could also secure minor repairs to the structure) is supported. As indicated by the County Council's Archaeologist, your Officers consider that positive impacts upon the setting of the scheduled ancient monument outweigh the negative and this is supported by the advice in the NPPF.

Blister Hanger and Daniels Barn

The demolition of the hanger is regrettable as an example of a military hanger dating back to 1941. However, the scope for retention was explored prior to the submission of the application and this is not possible due to the design/layout requirements of the new roundabout. The demolition of Daniels Barn and the Blister hanger is regarded by Historic England as substantial in terms of NPPF. However, as NPPF states the significance of the asset is relevant in assessing the level of protection. The ES considers that the significance of both structures is low albeit the identified impact is slight to moderate adverse. The significant difference of opinion in terms of the significance of the structures between Historic England and the applicants' Heritage Consultant is surprising. Your Officers view is that there is nothing particularly important about Daniels Barn, it is of poor condition and not unusual for an agricultural building of its age. The Blister hanger is more significant in view of the airfield's active involvement during the second world war.

Discussions at the pre-application stage explained the difficulties of retaining this structure and this appeared to be accepted by Historic England at the time. Historic England has been approached to clarify its position. However, if it is considered that its loss is substantial in NPPF terms it is considered that its loss could be justified in terms of the substantial public benefits of delivering the new A27 roundabout to deliver the strategic housing allocations at New Monks Farm and employment development at the airport. As the Blister hanger is not designated its significance is of relevance in weighing up the harm caused as indicated by NPPF guidance.

Pill Boxes and Anti War Defence Structure

It is proposed to retain these structures and it is important that any works associated with the new watercourse and proposed landscaping do not impact on the structural stability of these wartime structures and a condition requiring appropriate mitigation works is recommended. The conditions recommended by Historic England and the County Archeologist are included in the list of recommended conditions.

10. Planning Balance

The starting point for determining this application is the adopted Local Plan which allocates this site for a minimum of 600 homes and 10,000 sqm of employment generating space. The Plan was flexible in relation to the quantum of development and the precise line of the built-up area boundary so that a review of the viability, drainage and landscape implications of development could be assessed in a comprehensive manner.

As the report identifies there are significant viability issues with the Local Plan allocation for this site which has serious implications for the delivery of the Plan. The proposed development, by incorporating a large non-food retail store, has demonstrated that these viability issues can be addressed and the scheme can deliver the infrastructure necessary to serve the development. In addition, the development would provide for an access and drainage solution to help bring forward the commercial development at the airport.

In viability and drainage terms there is justification for extending the built form beyond the indicative built-up area boundary but the report identifies that this does impact on the

landscape and the land available for the Country Park. The scheme does depart from aspects of the Local Plan policy for the site, in particular the overall level of retail floorspace proposed and the reduction in the size of the Country Park (below the minimum 28 ha required) and therefore it is necessary to determine whether there are other material planning considerations which indicate a departure can be justified.

The planning assessment and ES has also identified that the development does have an impact on the setting of the National Park from key viewpoints and the Committee has to assess whether the level of mitigation proposed is sufficient to address the harm identified. Due regard has to be given to the special purposes of the Park to conserve and enhance its natural beauty, wildlife and cultural heritage and to promote opportunities for the understanding and enjoyment of their special qualities by the public.

Historic England has also identified an adverse impact on the setting of designated assets (Lancing College, the toll bridge and the Old Shoreham Conservation Area) and this '*less than substantial harm*' has to be assessed against the public benefits of the development. The demolition of two non-listed buildings but of heritage significance has also to be assessed against the overall public benefits of the scheme.

In terms of public benefits, the delivery of 600 dwellings is vital to meet the Districts future housing needs. As the Local Plan identifies the Council cannot meet its Objectively Assessed Housing Need (OAN) and the sites available are limited. With the number of households on the Councils Housing Register approaching 1,000, the early delivery of 180 affordable homes is an important consideration. The loss of this site would be significant and could potentially affect the Councils ability to deliver a 5-year supply of housing if other sites are delayed.

The significant employment generated by the development is also compelling. The IKEA store would deliver 430 jobs and the development would assist in bringing forward jobs associated with the commercial development planned at the airport. The ES suggests that with construction jobs and indirect jobs the total could rise to 876 new jobs. The intended occupier, IKEA is an international company and has a reputation for providing good employment and training opportunities. IKEA is a living wage employer which is significant given that the site lies adjacent to a Ward that is in the top 20% deprived in terms of income and education and skills.

The benefits to the local economy are recognised by a number of local business organisations notably the Chamber of Commerce and the West Sussex Coastal Partnership and it is accepted that this £150 million development would be a significant boost to the local and wider regional economy. The ES provides a summary table which highlights the key economic benefits of the proposed development to the local economy and this is set out below:

| Economic Impact Summary (100% job occupancy) | Completed Development | Annual Average during Construction |
|---|------------------------------|---|
| Jobs Created | | |
| Gross Direct IKEA PT and FT | 350 | |
| Gross Direct IKEA Ancillary | 80 | |
| Construction FTE Jobs | 332 | |
| New School | 15 | |
| Indirect Jobs | 99 | |
| Gross Jobs | 876 | |
| IKEA Net Direct FTE Jobs | 189 | |
| Construction FTE Jobs | 109 | |
| New School FTE Jobs | 15 | |
| Net FTE Jobs | 313 | |
| New Homes Indirect Jobs | 44 | |
| IKEA Indirect Jobs | 55 | |
| Indirect FTE Jobs | 99 | |
| Total Net FTE Jobs | 413 | |
| GVA Economy | | |
| New Homes | £3,171,996 | £1,871,477 |
| New Commercial | £5,488,560 | £4,390,848 |
| Adur Economy GVA | £8,660,556 | £6,262,325 |
| New Homes Bonus (2 Years) | £186,023 | £18,602 |
| Additional Business Rates | £1,500,000 | £1,200,000 |
| Council Tax Revenue | £1,108,671 | £653,217 |
| Total Public Sector | £2,794,694 | £1,871,819 |
| Total Economic Impact | £11,455,249 | £8,805,964 |

Table 6-1 Economic Impact Summary Table

It is relevant that the Airport is currently in administration and therefore the delivery of the joint access and drainage strategy would help the future viability of the airport as indicated by the Head of Major Projects and Investment.

Lancing College has indicated, however, that these economic benefits would have to be balanced by the negative impact on its future viability as the scheme does not provide a 4th arm for Coombs Road and therefore it would make the College less attractive to future pupils and impact on its business and community events. Whilst it is recognised that for westbound traffic from Coombes Road it would involve a slightly longer journey it is difficult to quantify the possible financial impact on the College in the future. Nevertheless, the applicant has indicated a willingness to pursue the 4th arm with the National Park and it is noted that Ricardos would also benefit from the provision of a 4th arm. It is clear from the relevant highway authorities that this is not required, however, to make the development acceptable in highway terms.

Financial considerations are a material consideration in the determination of planning applications and the significant contribution the development would make to the local economy and the District Council in terms of New Homes Bonus and Business rates is clearly a relevant material consideration.

Notwithstanding the considerable public opposition to the proposed development, it is considered that there are significant public benefits with the proposed development which, on balance, would justify approval. The adverse impacts of the development are recognised but with the additional mitigation measures identified in the report, these effects are not so significant to outweigh the benefits of the scheme. The development would deliver a key strategic housing site, significant jobs and provide an economic stimulus to the District. The delivery of a drainage solution which would help to reduce flood risk and an access solution to help facilitate commercial development at the airport is also of great significance.

The technical aspects of the scheme including highways, drainage, air quality and noise have been satisfactorily addressed with the relevant statutory consultees and planning conditions, together with the proposed s106 agreement can secure the necessary infrastructure and mitigation measures required.

Under the Town and Country Planning (Consultation) (England) Direction 2009, section 77 of the Town and Country Planning Act 1990 allows the Secretary of State to give directions requiring applications for planning permission to be referred to her/him instead of being dealt with by the local planning authority. This Direction indicates that for major development (over 5,000 sqm) which consists of retail use and which is to be carried out on land out-of-town and not in accordance with one or more provisions of the development plan should be referred to the Secretary of State. Although the strategic allocation does allow for employment uses it is considered that this application should be referred to the Secretary of State and this is reflected in the recommendation below.

11. Recommendation

On balance, it is recommended that the Committee delegates the decision to the Head of Planning and Development to approve subject to the completion of a s106 agreement and the Secretary of State confirming that he does not wish to 'call in' the application for his determination and the imposition of the following planning conditions:

General

1. The development for which full planning permission is granted shall be begun before the expiration of three years from the date of this permission.
2. The development for which full planning permission is granted shall be carried out in accordance with the approved plans listed in the schedule below.

| Description | Drawing Number | Date Received |
|-------------|----------------|---------------|
| | | |

3. If, during development, contamination not previously identified is found to be present at the site then no further development within that Phase shall be carried out (unless otherwise agreed in writing with the local planning authority) until the developer has submitted a remediation strategy to the Local Planning Authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.
4. The development hereby permitted shall be carried out in accordance with the approved Flood Risk Assessment (FRA) (CEP v1.4, dated June 2017) and FRA Addendum (CEP v1.3, dated December 2017) and the following mitigation measures detailed within:

- Crest height of the onsite flood defence embankment to be set no lower than 5.4mAOD
 - Finished first floor levels to habitable accommodation to be set no lower than 5.7mAOD
 - Finished floor levels to retail store and primary school to be set no lower than 4.5mAOD
 - Floor levels to the proposed traveller site are set no lower than (4.35mAOD) and highest (5.0mAOD) as shown on drawing number (2-401A)
5. Within one calendar year from commencement of the development a written Conservation Management Plan for the Shoreham Airfield Dome Trainer shall be submitted to and approved by the Local Planning Authority.
6. All hard and soft landscape works including any management and maintenance plan details, shall be carried out in accordance with the approved details. All planting seeding or turfing and soil preparation comprised in the above details of landscaping shall be carried out no later than first planting and seeding seasons following the first occupation of the buildings, the completion of the development, or in agreed phases whichever is the sooner, and any plants which within a period of five years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species, unless the local planning authority gives written consent to any variation. All landscape works shall be carried out in accordance with the guidance contained in British Standards BS5837:2012.

Prior to Commencement

7. No Phase of the development shall commence until the measures which will be undertaken to protect the public water apparatus located within that Phase, have been submitted to and approved in writing with the Local Planning Authority.
8. No Phase of the development shall commence, including any works of demolition, until a Construction Management Plan for that Phase has been submitted to and approved in writing by the Local Planning Authority. Thereafter the approved Plan shall be implemented and adhered to throughout the entire construction period unless otherwise agreed in writing with the Local Planning Authority. The Plan shall provide details of:
- the anticipated number, frequency and types of vehicles used during construction,
 - the method of access and routing of vehicles during construction,
 - the parking of vehicles by site operatives and visitors,
 - the loading and unloading of plant, materials and waste,
 - the storage of plant and materials used in construction of the development.
 - the erection and maintenance of security hoarding,
 - the hours of construction,

- the provision of wheel washing facilities and other works required to mitigate the impact of construction upon the public highway (including the provision of temporary Traffic Regulation Orders),
 - details of public engagement both prior to and during construction works.
9. The overarching drainage scheme for the site shall be implemented in accordance with the details set out in the approved Flood Risk Assessment (FRA) (CEP v1.4, dated June 2017) and FRA Addendum (CEP v1.3, dated December 2017).
10. No Phase of the development shall commence unless and until a detailed scheme for the provision of surface water drainage for that Phase has been submitted to and approved in writing by the Local Planning Authority.
11. No Phase of the development shall commence until full details of the existing and proposed land levels of that Phase in relation to Ordnance Datum and to surrounding properties have been submitted to and approved in writing by the Local Planning Authority.
12. No Phase of the development shall commence until an Ecological Mitigation and Management Plan (EMMP) for that Phase has been submitted to and approved in writing by the Local Planning Authority. The EMMP shall incorporate the recommendations of Chapter 11 of the Environmental Statement dated June 2016 and its appendices, and Chapter 11 of the Further Information to the Environmental Statement dated December 2017 and its appendices
13. No development of the pumping station or associated works below mean high water mark approved by this permission shall take place until a scheme for the provision and management of at least 840m² compensatory intertidal habitat creation, in accordance with Flood Risk Assessment (FRA) Addendum ((CEP v1.3, dated December 2017) and drawing ref. 6-301, has been submitted to and agreed in writing by the local planning authority. The scheme shall include:
- Scaled plans showing the exact areas of intertidal habitat lost and gained
 - Methods for implementing and maintaining the compensatory habitat, including how any environmental risks will be mitigated
 - Timings

Thereafter the development shall be implemented in accordance with the approved scheme.

14. No Phase of the development shall commence until a Construction Environmental Management Plan for that Phase in accordance with the approach outlined in the Environmental Statement, has been submitted to and approved in writing by the local planning authority. This shall deal with the treatment of any environmentally sensitive areas, their aftercare and maintenance as well as a plan detailing the works to be carried out showing how the environment will be protected during the works. Such a scheme shall include details of the following:
- The timing of the works

- The measures to be used during the development in order to minimise environmental impact of the works (considering both potential disturbance and pollution)
- A map or plan showing areas designated for oil storage, washing down concrete/ cement, etc.
- A map or plan showing habitat areas to be specifically protected during the works.
- Any necessary pollution protection methods
- Information on the persons/bodies responsible for particular activities associated with the method statement that demonstrate they are qualified for the activity they are undertaking.

The works shall be carried out in accordance with the approved method statement approved for the relevant Phase.

15. No Phase of the development shall commence until a scheme for the provision and management of a buffer zone alongside all ditches within the Phase has been submitted to and agreed in writing by the Local Planning Authority. Thereafter the development shall be carried out in accordance with the approved scheme and any subsequent amendments shall be agreed in writing with the Local Planning Authority. The buffer zone scheme shall be free from built development including domestic gardens and formal landscaping; and should form a vital part of green infrastructure provision. The schemes shall include:

- plans showing the extent and layout of the buffer zone.
- details of any proposed planting scheme (for example, native species).
- details demonstrating how the buffer zone will be protected during development and managed/ maintained over the longer term including adequate financial provision and named body responsible for management plus production of detailed management plan.
- details of any proposed footpaths, fencing, lighting etc.

16. No Phase of the development, except remediation, demolition, archaeological and drainage works, shall commence until a detailed watercourse management plan, in accordance with the approved Draft Watercourse and Flood Defence Bund Management Plan, including long-term ecological objectives, management responsibilities and maintenance schedules for all of the ditches within that Phase, has been submitted to and approved in writing by the Local Planning Authority. The water management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the Local Planning Authority. The scheme shall include the following elements:

- details on how water levels in the ditches shall be maintained to achieve the long term ecological objectives of the plan
- details of maintenance regimes and management responsibilities
- details of eel passage through hydrological barriers as required by Eel Regulations
- details of monitoring and adaptive management

17. No works to the ditch network within any Phase of the development shall take place until a detailed scheme of the proposed alterations to the ditches within that Phase has been submitted to and approved in writing by the local planning authority. The scheme shall be carried out as approved and any subsequent variations shall be agreed in writing by the Local Planning Authority. The scheme shall include the following:
 - scaled plan and section drawings of channel profiles
 - details of how profiles and features have been incorporated to maximise ecological benefit
 - details of the design of the reed bed pond
 - details of the design of the sedge bed wetland
18. No construction of the proposed bridges shall take place until such time as the Technical Approval process as specified within BD 2/12 of the Design Manual for Roads and Bridges has been completed in regards of the proposed 5 Highway Bridges (HW01-05) and written confirmation has been submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority.
19. No Phase of the development except remediation, demolition, archaeological and drainage works for which planning permission is hereby granted, shall take place until a schedule of materials for that Phase, including for hard and soft landscaping, has been submitted to and approved in writing by the Local Planning Authority.
20. No development relating to the A27 access roundabout as shown on drawing VN40408_PL-015-J shall be carried out, except remediation, demolition, archaeological and drainage works, until the new Withy Patch Gypsy and Traveller Site have been completed in accordance with the approved plans.
21. The traffic signal control at the Sussex Pad junction associated with General Arrangement Drawing Number VN40408/PL-015 Rev J shall not be removed until the proposed improvements to upgrade the existing footpath ProW 2049 to a bridleway as shown in General Arrangement Drawing Number VD14260_SK-0101 Rev C and the new bridleway link between PRoW 2049 to Coombes Road as shown in General Arrangement Drawing Number HED-1172-LA-601 Rev 01 Masterplan and Elevation have been completed to the satisfaction of Highways England and West Sussex County Council as Local Highway Authority
22. No Phase of the development shall commence until the implementation of a programme of archaeological mitigation works within that Phase has been secured in accordance with a written Archaeological Mitigation Strategy and timetable which have been submitted to and approved in writing by the Local Planning Authority. The following heritage assets listed in the Environmental Statement Appendix 12.3 (Archaeology and Cultural Heritage Impact Assessment report) will be recorded:
 - (a) HA001 (Shoreham Airfield dome trainer).
 - (b) HA025 (Over blister hangar)

- (c) HA 027 (Daniel's Barn).
- (d) HA 050 (WWII pillbox)
- (e) HA 058 (WWII Type 24 pillbox).
- (f) HA 061 (WWII field gun emplacement).

- 23. No development relating to the A27 access roundabout shall commence until details of a landscaping and ground improvement scheme for the vicinity of the Shoreham Airfield dome trainer Scheduled Monument has been submitted to and approved in writing by the Local Planning Authority.

Prior to Occupation

- 24. No dwelling shall be first occupied until a Residential Travel Plan has been submitted to and approved in writing by the Local Planning Authority. The Residential Travel Plan once approved shall thereafter be implemented as specified within the approved document. The Residential Travel Plan shall be completed in accordance with the latest guidance and good practice documentation as published by the Department for Transport or as advised by the Highway Authority.
- 25. No dwelling shall be first occupied until covered and secure cycle parking spaces serving that unit have been provided in accordance with plans and details that shall be submitted to and approved by the Local Planning Authority.
- 26. No dwelling shall be first occupied until the car parking serving that unit has been constructed in accordance with the approved plans. These spaces shall thereafter be retained at all times for their designated purpose.
- 27. The football pitches hereby approved shall not be brought into use until the boundary fencing shown on the approved plans has been erected. Such fencing shall thereafter be permanently retained.
- 28. No more than 60 dwellings shall be occupied until improvements to the Grinstead Lane approach to the A27 as shown in Drawing Number VN40408/PL-032 have been completed to the satisfaction of West Sussex County Council as Local Highway Authority.

Regulatory

- 29. The use of the football pitches hereby approved shall be limited to between the hours of 9am until 10pm every day.
- 30. The football pitches hereby approved shall not be floodlit.

Outline Planning Permission for 351 Dwellings, Non-Food Retail Store, Primary School and Community Hub

General

31. Each Phase of the development for which outline planning permission is hereby granted shall be commenced before the expiration of three years from the date of this permission or two years from approval of the last Reserved Matters relevant to that Phase as defined in Condition 32, 33 and 34 below, whichever is later.
32. The detailed design of the development proposed through Reserved Matters applications pursuant to the outline planning permission shall have regard to, and broadly accord with, the principles set out on the following parameter plans and supporting documents:

| Description | Drawing Number | Date Received |
|-------------|----------------|---------------|
| | | |

33. Details of the Reserved Matters associated with the residential dwellings granted outline approval (the Residential Reserved Matters) shall be submitted to the Local Planning Authority within three years from the date of this permission to include:

- (i) scale
- (ii) appearance
- (iii) layout
- (iv) landscaping

No development of the dwellings granted outline permission, other than remediation, drainage and archaeological works, shall commence until the Residential Reserved Matters has been submitted to and approved by the Local Planning Authority.

34. Details of the Reserved Matters associated with the Non-Food Retail Store granted outline approval (the Retail Reserved Matter) shall be submitted to the Local Planning Authority within three years from the date of this permission:

- (i) Landscaping

The submitted details shall include precise specifications of the proposed Green Roof including plant species and density of planting and cross sections identifying planting height to demonstrate screening of the remainder of the roof and a maintenance schedule.

No development of the Non-Food Retail Store, other than remediation, drainage and archaeological works, shall commence until the Retail Reserved Matter has been submitted to and approved by the Local Planning Authority.

35. The Green Roof shall be a minimum of 4,500 square metres.

36. Details of the Reserved Matters associated with the Primary School granted outline approval (the School Reserved Matters) shall be submitted to the Local Planning Authority within three years from the date of this permission:

- (v) scale
- (vi) appearance

- (vii) layout
- (viii) landscaping

No development of the Primary School, other than remediation, drainage and archaeological works, shall commence until the School Reserved Matters has been submitted to and approved by the Local Planning Authority.

- 37. The height of the proposed Non-Food Retail Store should not exceed 12.14 metres (16.64 - Above Ordnance Datum AOD) (other than plant and associated infrastructure which should not exceed 15.00 metres).

Prior to Commencement

- 38. Notwithstanding the submitted plans the north and east elevations of the non-food retail store are not hereby approved. Prior to the commencement of development revised plans shall be submitted to and approved in writing with the LPA proposing louvres extending across the entire north elevation and extending partly across the east elevation to meet the louvres proposed for the recessed section of the north elevation.
- 39. Notwithstanding the submitted details, prior to the erection of external facing materials of the Non-Food Retail Store, detailed plans of the louvres to the northern boundary shall be submitted to and approved by the Local Planning Authority. These details shall include detailing, materials and spacing of the louvres and shall generally be in accordance with Drawing XX/XXXX/XX. The development shall commence in accordance with the approved Drawing and retained in perpetuity unless otherwise agreed in writing with the LPA.
- 40. The Non-Food Retail store hereby permitted shall achieve a BREEAM "Very Good" standard as a minimum. Within three months from commencement of the Non-Food Retail Store a BREEAM design stage assessment report shall be submitted to the Local Planning Authority confirming that this standard will be achieved. A post completion BREEAM report shall be submitted to the Local Planning Authority within 6 months of the substantial completion of the development hereby approved. The required BREEAM assessments shall be prepared, and any proposed design changes approved prior to commencement of the development, by a licensed BREEAM assessor.
- 41. No development of the Primary School shall take place until an acoustic report has been submitted to and approved in writing by the Local Planning Authority which contains details of how the School at all storeys and all facades will be glazed and ventilated in order to protect internal occupants from road traffic noise and to comply with the "good" levels in British Standard 8233 and the levels stated in BB93 or suitable equivalent. The scheme shall be implemented fully in accordance with the approved details and retained as such thereafter.
- 42. No development, other than archaeology and drainage works, of the residential dwellings hereby granted outline planning permission shall take place until a scheme for nature conservation enhancement has been submitted to and approved

by the Local Planning Authority. The scheme shall be fully implemented in accordance with the approved details and retained as such thereafter.

Prior to Occupation

43. The Non-Food Retail store shall not be occupied until such time as until a Servicing Management Plan has been submitted and approved in writing by the Local Planning Authority. This shall set out the arrangements for the loading and unloading of deliveries, in terms of location and frequency, and set out arrangements for the collection of refuse. Once occupied the use shall be carried out only in accordance with the approved Servicing Management Plan.
44. The Non-Food Retail store shall not be occupied until the bicycle and motorcycle parking have been provided in accordance with the approved drawings. Thereafter these spaces shall be kept available for use at all times.
45. No more than 249 dwellings shall be occupied until the Country Park has been completed in accordance with the approved plans.
46. The Non-Food Retail store or any more than 249 dwellings shall not be occupied until the proposed improvements to the A27 / Grinstead Lane / Manor Road Roundabout as shown in the General Arrangement Drawing Number VN40408/PL-010 Rev D have been completed to the satisfaction of Highways England and West Sussex County Council as local highway authority, or a contribution has been made for the cost of the works shown in Drawing Number VN40408/PL-010 Rev D, to be secured under Section 106 of the Town and Country Planning Act 1990.
47. No more than 249 dwellings shall be occupied until the Pumping Station on the bank of the River Adur has been completed in accordance with the approved plans.
48. The Non-Food Retail store or any more than 249 dwellings shall not be occupied until the proposed Development Access and Sussex Pad Junction Works as shown in the General Arrangement Drawing Number VN40408/PL-015 Rev J and the Coombes Road Merge / A283 Diverge Link Works as shown in General Arrangement Drawing Number VN40408/PL-030 Rev A have been completed to the satisfaction of Highways England and West Sussex County Council as local highway authority.
49. The Non-Food Retail store shall not be occupied until a Staff Travel Plan has been submitted to and approved in writing by the Local Planning Authority. The Staff Travel Plan once approved shall thereafter be implemented as specified within the approved document. The Retail Travel Plan shall be completed in accordance with the latest guidance and good practice documentation as published by the Department for Transport or as advised by the Highway Authority.
50. The Non-Food Retail store or any more than 249 dwellings shall not be occupied until a bus gate between Hayley Road and the development has been provided in accordance with details to be submitted to and approved in writing by the Local Planning Authority.

Regulatory

51. The non-food retail store hereby approved shall not be open to the public before 10:00 am Monday to Friday (excluding browsing time and use of the ancillary restaurant from 09:30 hours).
52. No more than 250 dwellings shall be occupied until access from Hayley Road has ceased from which point it shall be limited to use by cyclists, pedestrian's buses or emergency vehicles only.
53. The approved landscaping scheme for each Phase shall be fully implemented in accordance with the approved details within the first planting season following the substantial completion of that Phase. Any trees, hedges or shrubs, which within a period of 5 years, die, are removed, or become seriously damaged or diseased shall be replaced with trees, hedging plants or shrubs of a type, size as previously approved unless agreed in writing with the Local Planning Authority.
54. Notwithstanding the provisions of Class A1 of the Town and Country Planning Act 1990, Use Classes (amendment) Order 2005, the use of the non-food retail store shall be limited to the sale of bulky goods, DIY products, furniture and homewares and those goods and departments referred to in the Retail Statement prepared by DWD and for any ancillary uses which are offered in support of the main retail function.
55. The non-food retail store hereby approved shall not be divided into more than one unit and shall be used for the purposes of a single retail operator unless otherwise agreed in writing with the LPA.

18th July 2018

List of Appendices

- Appendix 1 - Masterplan
- Appendix 2 - Local Plan Inspector's comments on the Strategic Allocation - Policy 5.
- Appendix 3 - Plan indicating the extent of the development beyond the indicative built up area and key view cones
- Appendix 4 - Financial Appraisal – Local Plan Allocation
- Appendix 5 - Plan showing Non-Motorised User (NMUs) Routes
- Appendix 6 - Draft Heads of Terms for Section 106 Agreement
- Appendix 7 - IKEA Landscape Framework Plan
- Appendix 8 - Suggested Mitigation measures

APPENDIX 1



Local Plan Inspectors Comments on New Monks Farm Allocation – Policy 5

New Monks Farm, Lancing (Policy 5)

57. The Council intends to clarify the development requirements at New Monks Farm by referring to a minimum of 600 dwellings and a minimum of 10,000 sqm of employment generating floorspace. This more flexible approach is justified in order to ensure that the most effective use of land is achieved and therefore MM8 is recommended. In terms of the commercial floorspace the introduction of a degree of flexibility into the policy will enable consideration of all the elements of any proposal to be undertaken in a comprehensive way, taking into account issues of viability. There is no reason to conclude that the floorspace figure would be significantly exceeded because policy 5 still requires the provision of a country park (at least 28ha), the implementation of a landscape strategy and the provision of green infrastructure.

58. Map 2, which accompanies policy 5, includes what is described as an 'indicative built-up area boundary'. The Council consulted on this approach, which would allow the precise boundary to be drawn up once all the detailed drainage and landscape assessments have been undertaken. There were no persuasive objections to the indicative boundary and I agree that it does enable a level of flexibility to be adopted. However, in order to add clarity and further explain the Council's approach, it is proposed to add a paragraph to the policy confirming that although the boundary of the built-up area is only indicative, any amendments to the Council's identified boundary (for example drawn up at planning application stage) must be based on a clear and convincing justification to the satisfaction of the Council. I consider that this is necessary in order to ensure that the most appropriate strategy is being advocated and therefore I recommend MM7.

59. In the interests of consistency, the Council proposes to refer to the Country Park being a minimum size of 28 ha. This reflects the most appropriate strategy to follow and is therefore recommended (MM9).

60. The existing Withy Patch Gypsy and Traveller site will need to be relocated in order that a new road junction to gain access to the New Monks Farm site and Shoreham Airport can be satisfactorily provided. Although negotiations are still underway I am not aware of any significant impediments to providing this improved access and the policy wording relating to this requirement has been agreed by Highways England. The promoters of the site have identified a new location for a replacement and enlarged Gypsy and Traveller site and I am satisfied that all the relevant stakeholders have been involved in the process. In order to more clearly explain the justification for the aforementioned relocation it is recommended that a reference to the proposed new access is included within the policy (MM6).

61. Concerns have been raised, for example by local residents, regarding the highway implications of the development. However, the policy requires the

mitigation of off-site highway impacts, the provision of sustainable transport infrastructure and travel behaviour initiatives. No fundamental objections to the allocation have been submitted from the relevant highway bodies¹⁰ and I am satisfied that in this respect the policy is sound.

62. Concerns have been raised regarding the management and maintenance of any proposed drainage works. Bearing in mind the circumstances of the site I consider those concerns to be justified. Accordingly, in order to ensure consistency with national policy and to reflect the most appropriate strategy, it is recommended that policy 5 includes a requirement that a strategy for the long-term management and maintenance of drainage works on the site be prepared (MM10).

63. In order that any evidence submitted prior to (or with) a planning application is current, the Council is proposing to include a requirement for ecological information to be up to date. This will ensure that the most appropriate strategy will be followed and therefore MM11 is recommended.

64. There is a World War II Dome Trainer (a scheduled monument) relatively close to the proposed roundabout. However, it is in a poor state of repair and is not readily accessible to the public. Whilst it is acknowledged that the proposed development would have consequences for the setting of the building, it must be remembered that the historical context for the dome has already been lost. The Brighton City Airport (Shoreham) Heritage Assessment (2016) concludes that the proposed development provides 'an opportunity to arrest decay and stabilise the structure'. The land owner has indicated that a conservation management plan for the building would be adopted that facilitates public access, secures the future of the building and delivers heritage interpretation. Policies 16 and 17 afford protection to heritage assets and I am satisfied that the retention and restoration of the Dome Trainer can be satisfactorily secured.

65. Policy 5 requires a degree of phasing to be undertaken and I am satisfied that this can be secured through the use of appropriate legal agreements at the time any planning application for the site is considered.

66. New Monks Farm is mainly within flood zone 3a, with parts in flood zones 1 and 2. The evidence demonstrates that the site passes the Sequential Test. With regard to the Exceptions Test there are a number of flood risk issues that remain unresolved but it is clear that at this stage, in broad terms, appropriate mitigation measures may be achievable. Further work will be required as the details of the development are finalised but at this stage there is nothing that would lead me to conclude that issues of flood risk and drainage cannot be satisfactorily addressed. Neither the Environment Agency (EA) or West Sussex County Council (as the Lead Local Flood Authority) have objected to the current approach and it is clear that there is good communication between all the main interested parties.

67. There are a number of significant infrastructure costs associated with the development of this site and a number of funding initiatives are being progressed, including a bid for Local Growth Funding. There is no evidence that would lead me to conclude that there is any significant risk in terms of securing the necessary infrastructure improvements. It is acknowledged, however, that the high level of site development costs may reduce viability to a marginal level but no evidence was submitted to conclusively demonstrate that the development will not come forward.

68. Indeed, I have been made aware that a planning application has now been submitted for this site but I have not been given a copy of the documentation and it is not my role to comment on any details which it contains. It would not be appropriate, as has been suggested, for the hearings to be reopened to consider matters pertaining to the planning application.

APPENDIX 3

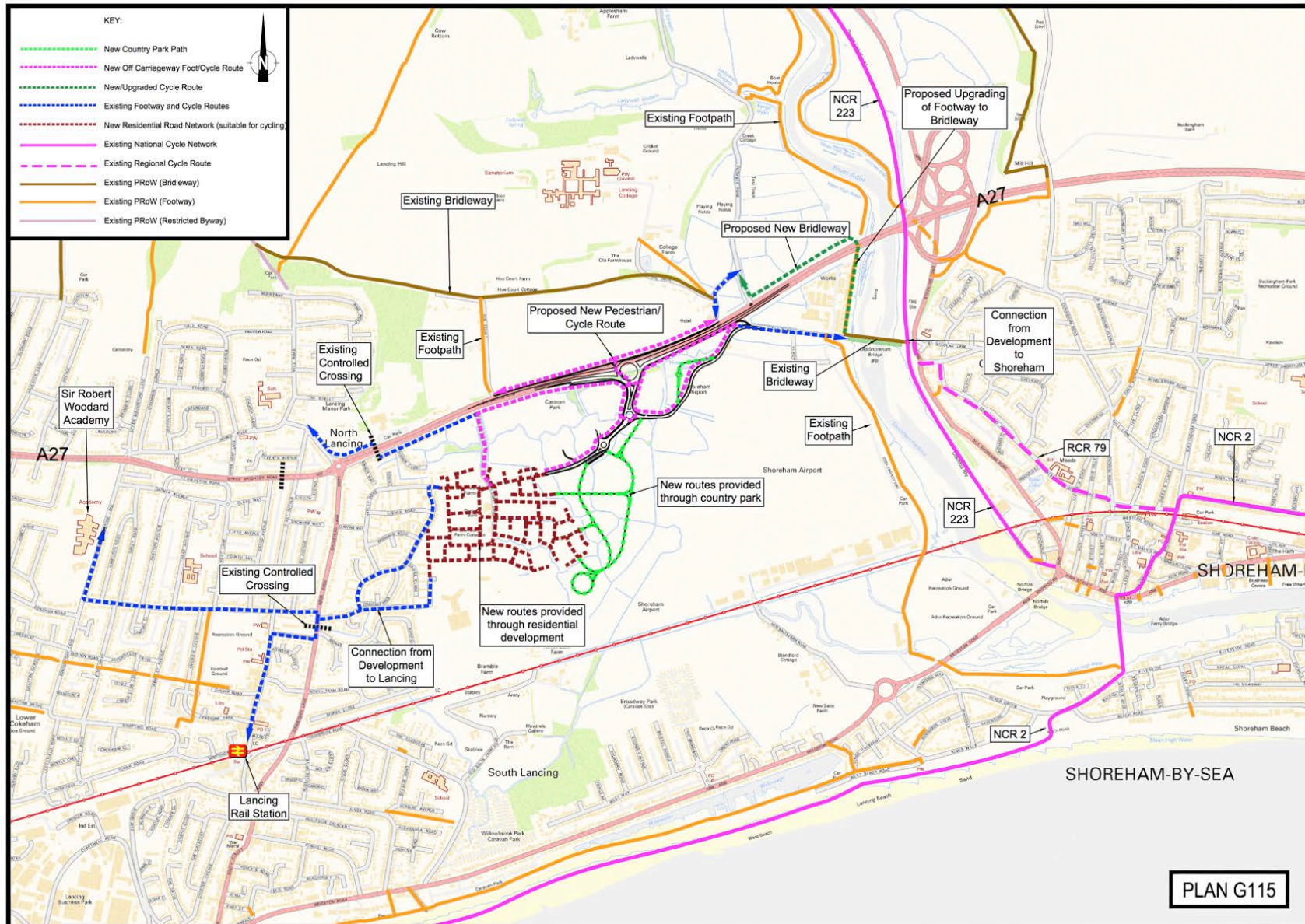


APPENDIX 4

| Revenue Rental Area Summary | Units | ft ² | Rate ft ² | Initial MRV/Unit | Net Rent at Sale | Initial MVR |
|--|-----------------------|----------------------------|----------------------|---------------------|---------------------|----------------|
| Warehouse | 1 | 100,000 | 9.50 | 950,000 | 950,000 | 950,000 |
| Investment Valuation Warehouse | | | | | | |
| Market Rent (1yr Rent Free) | 950,000 | YP @ PV 1yr @ | 6.7500% 6.7500% | 14.8148 0.9368 | 13,184,144 | |
| GROSS DEVELOPMENT VALUE | | | | 13,184,144 | | |
| Purchaser's Costs | | | (791,049) | | | |
| | | | | (791,049) | | |
| NET DEVELOPMENT VALUE | | | | 12,393,096 | | |
| NET REALISATION | | | | 12,393,096 | | |
| OUTLAY ACQUISITION COSTS | | | | | | |
| Residualised Price (Negative Land) | | | (57,535) | | | |
| | | | | (57,535) | | |
| Town Planning Survey | | | 25,000 100,000 | | | |
| | | | | 125,000 | | |
| CONSTRUCTION COSTS | | | | | | |
| Construction | ft² | Rate ft² | Cost | | | |
| Warehouse | 106,750 | 85.00 | 9,073,750 | 9,073,750 | | |
| Contingency | | 3.00% | 272,213 | | | |
| | | | | 272,213 | | |
| PROFESSIONAL FEES | | | | | | |
| Architect | | 4.00% | 362,950 | | | |
| Quantity Surveyor | | 1.00% | 90,738 | | | |
| Structural Engineer | | 1.00% | 90,738 | | | |
| Project Manager | | 3.00% | 272,213 | | | |
| C.D. Manager | | 2.00% | 181,475 | | | |
| | | | | 998,113 | | |
| MARKETING & LETTING | | | | | | |
| Marketing | | | 25,000 | | | |
| Letting Agent Fee | | 15.00% | 142,500 | | | |
| Letting Legal Fee | | 5.00% | 47,500 | | | |
| | | | | 215,000 | | |
| FINANCE | | | | | | |
| Debit Rate 6.000%, Credit Rate 0.000% (Nominal) | | | | | | |
| Land | | | (2,631) | | | |
| Construction | | | 152,696 | | | |
| Total Finance Cost | | | | 150,065 | | |
| TOTAL COSTS | | | | 10,776,605 | | |

| | | | | | | |
|--------------------------------------|--|--|------------------|------------------|--|--|
| PROFIT | | | | 1,616,491 | | |
| Shoreham NMF | | | | | | |
| Profit on Costs% | | | 15.00% | | | |
| Profit on GDV% | | | 12.26% | | | |
| Profit on NDV% | | | 13.04% | | | |
| Development Yield% (on Rent) | | | 8.82% | | | |
| Equivalent Yield% (Nominal) | | | 6.75% | | | |
| Equivalent Yield% (True) | | | 7.04% | | | |
| IRR | | | 61.38% | | | |
| Rent Cover | | | 1 year 8 months | | | |
| Profit Erosion (finance rate 6.000%) | | | 2 years 4 months | | | |

APPENDIX 5



Heads of Terms - Section 106 Agreement

| Type of Infrastructure / Payment Provision | Amount | Payment Date (Trigger) |
|--|---------------------------------------|---|
| Highways Implement the Grinstead Lane Roundabout Improvement Scheme or financial contribution to the HE (RIS) Scheme. | £640k | Prior to commencement of 250 th dwelling |
| Improvements to pedestrian and cycle links. | £100k | Phased payment |
| Public Transport Service | £1.2m | |
| Implementation of Travel Plan measures | | Phased and post development monitoring by TP Co-ordinator |
| Air Quality Air Quality Mitigation measures | £663k | Phased payment |
| 4th Arm to new A27 Roundabout To use reasonable endeavours to implement 4 th Arm if planning permission granted by SDNP and funding available. | N/A | |
| Education Provision of land for a 1FE Primary School (with room to expand to 2EF). | | TBA |
| Fire and Rescue Libraries | £ based on housing mix formulae. | Phased payments |
| Local Employment / Apprenticeships IKEA – Carla – | Use of Local Employment / Contractors | Ongoing requirement throughout the development |

| | | |
|--|---|---|
| | 4 apprenticeships a year | |
| Contribution to Health (Coastal Clinic Commissioning - CLG). Extension or new Medical Facility to serve the development | £500k | Contributions phased through the development |
| Police Contribution | £109k | Phased payment |
| Affordable Housing Nomination rights for affordable rent and reasonable endeavours to ensure local marketing for intermediate / shared ownership. Provision of 30% affordable homes. | 108 affordable rent 72 intermediate / shared ownership | 75 in Phase I (Full permission) Further 105 in Phase II (outline) |
| Open Space Retain in perpetuity and provision of public access at all times. Maintenance specifications and setting up of Management Company to maintain open space, SUDs and pumping station (including provision of 24 hour call out facility). Ecological Management Plan | | Post development restriction Prior to occupation of any of the development |
| Additional Pitches No floodlighting at any time | | Post development restriction |
| Provision of Community Hub | Minimum of 250 sqm | Phase 2 Outline |
| Provision of the new Gypsy and Traveller site | Relocation of existing and additional 4 pitches | First phase of development |

APPENDIX 7





Local Government Act 1972**Background Papers:**

As referred to in individual application reports

Contact Officers:

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Schedule of other matters

1.0 Council Priority

- 1.1 As referred to in individual application reports, the priorities being:-
- to protect front line services
 - to promote a clean, green and sustainable environment
 - to support and improve the local economy
 - to work in partnerships to promote health and wellbeing in our communities
 - to ensure value for money and low Council Tax

2.0 Specific Action Plans

- 2.1 As referred to in individual application reports.

3.0 Sustainability Issues

- 3.1 As referred to in individual application reports.

4.0 Equality Issues

- 4.1 As referred to in individual application reports.

5.0 Community Safety Issues (Section 17)

- 5.1 As referred to in individual application reports.

6.0 Human Rights Issues

- 6.1 Article 8 of the European Convention safeguards respect for family life and home, whilst Article 1 of the First Protocol concerns non-interference with peaceful enjoyment of private property. Both rights are not absolute and interference may be permitted if the need to do so is proportionate, having regard to public interests. The interests of those affected by proposed developments and the relevant considerations which may justify interference with human rights have been considered in the planning assessments contained in individual application reports.

7.0 Reputation

- 7.1 Decisions are required to be made in accordance with the Town & Country Planning Act 1990 and associated legislation and subordinate legislation taking into account Government policy and guidance (and see 6.1 above and 14.1 below).

8.0 Consultations

- 8.1 As referred to in individual application reports, comprising both statutory and non-statutory consultees.

9.0 Risk Assessment

- 9.1 As referred to in individual application reports.

10.0 Health & Safety Issues

10.1 As referred to in individual application reports.

11.0 Procurement Strategy

11.1 Matter considered and no issues identified.

12.0 Partnership Working

12.1 Matter considered and no issues identified.

13.0 Legal

13.1 Powers and duties contained in the Town and Country Planning Act 1990 (as amended) and associated legislation and statutory instruments.

14.0 Financial implications

14.1 Decisions made (or conditions imposed) which cannot be substantiated or which are otherwise unreasonable having regard to valid planning considerations can result in an award of costs against the Council if the applicant is aggrieved and lodges an appeal. Decisions made which fail to take into account relevant planning considerations or which are partly based on irrelevant considerations can be subject to judicial review in the High Court with resultant costs implications.