

Addendum Report

Planning Committee
3rd October 2018
Agenda Item 5(2)
Ward: ALL

2. Application Reference: AWDM/1093/17

**Recommendation – Approve
subject to S106 agreement**

Site: Shoreham Airport, Cecil Pashley Way, Shoreham (Brighton City)
Airport, Lancing, West Sussex, BN43 5FF

Proposal: 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).

1. Amended Design Code and Further Comments from Agent

The applicant has submitted a revised Design Code document to address the additional comments of the National Park and your Officers and this incorporates the following changes:

- Correcting typographical errors
- Referencing the impact upon the SDNP when considering any principle/parameter
- Reference to natural materials added
- Comment added that lighting facing towards the SDNP will be minimised.
- Removal of the 'Courtyard' option from the layout options as requested.

The applicants **Air Quality Consultant** has indicated that,

“Following our discussion the emissions calculation was in fact already included in the New Monks Farm application calculation and the subsequent Shoreham Airport application condition ((2) page 101 of the Adur Planning Committee Report) is not required. In fact this would amount to a double counting of the emissions mitigation cost.

For clarification :

- *The air quality assessments for both proposals included a combined (cumulative) assessment of air quality which included combined traffic movements from each proposal.*

- *The emissions mitigation assessment for New Monks Farm also included the combined emissions calculation and mitigation for both proposals to reflect the in-combination effects of the transport activities related to both proposals. The traffic counts used in the New Monks Farm emissions calculation thus used the combined traffic figures from both proposals.*
- *The New Monks Farm produced a combined emissions mitigation assessment for both proposals and has provided overall mitigations to cover the calculated value (revised valued at £663,547).*
- *Therefore, although the emissions mitigation assessment presented in the Shoreham Airport is correct, the allocation of emissions cost value of £216,841 for the Shoreham Airport application has already been accounted for in the New Monks Farm emissions mitigation assessment.*

I hope this clarifies the position of the emissions mitigation calculation for the Shoreham Airport planning application AWDM/1093/17.”

2. Additional Consultations

The **Highway Authorities** (WSCC and Highways England) have signed a Position Statement to clarify its response to concerns raised about the highway proposals and provision for Non-Motorised Users (NMUs). This statement states that,

“Existing NMU Situation

- *NMU demand across the A27 (north south) is low as evidenced in the Transport Assessment by surveys undertaken by independent survey companies*
- *NMU demand across the A27 (north south) has a predominantly leisure focus with the majority of movements at weekends and less movements on weekdays*
- *Existing provision for NMUs is poor at the Sussex Pad Junction*
 - *Traffic flows through the Sussex Pad junction are high which results in minimum green times for Old Shoreham Road and Coombes Road resulting in significant delays for NMUs crossing the A27 in this location*
 - *No provision for equestrians*
 - *Requirement to cross at the pedestrian crossing red / green man facilities in two stages adding to the delays for those NMUs choosing to use the crossing*
 - *No controlled crossing on Old Shoreham Road and no dropped kerbs or tactile paving*
 - *Footway with poor surface and less than 1m width on northern side of junction linking to Lancing College (via The Drive)*
 - *No footway provision on the northern side of the junction linking directly to Coombes Road resulting in pedestrians walking on the verge next to high flow and speed conditions on the A27*

- No dedicated off-carriageway cycle crossing facilities
- 85th percentile traffic speeds on the A27 approximately 61mph approaching the Sussex Pad
- Existing footpath along the River Adur (Ref: PRow 2049) in poor condition
 - Route is unsurfaced
 - Worn 'path' providing a width of less than 1m.

Overall New Monks Farm NMU Provision

- New site access roundabout on the A27 includes dedicated, controlled crossing facilities for NMUs
- Existing shared foot/cycle link retained along the southern side of the A27, providing links to and from the new site access junction
- New shared foot/cycle link proposed on the northern side of the A27 linking Hoe Court to Lancing College and Coombes Road (both via The Drive)
- Existing National Cycle Network Route 223 provides a traffic-free route along the eastern side of the River Adur with links to the South Downs National Park (including a river crossing at Botolphs)
- New shared foot/cycle link through the New Monks Farm site providing a new connection between Lancing and Shoreham away from the A27
- Additional routes available through the Country Park providing route choice for a variety of journey purposes
- The proposed infrastructure improvements including the proposed site access arrangements and the proposed new NMU route from Old Shoreham Toll Bridge to Coombes Road have been the subject of a safety audit process and are considered adequate to safely accommodate the New Monks Farm development, including the proposed River Adur Route Upgrade.

River Adur NMU Route Upgrade

- Length of existing footpath to be upgraded to bridleway approximately 320m
- Connection provided to Coombes Road via new NMU route (already approved by SDNPA on 12th July 2018)
- Route is an improvement to the existing path and provides a more attractive, safer traffic-free environment away from the A27
- Consideration has been given to a range of design guidance documents combined with professional judgement, acknowledging localised constraints
- Consistent, surfaced width of 2.5m can be provided with clearance from edge constraints
- Length of approximately 150m where a total width in excess of 3m is achievable (range 3.2m to 3.9m)
- Upgraded route is suitable to accommodate a range of NMUs given the levels of flow, straight alignment and good forward visibility
- The River Adur bank is a recognised constraint with the proposed improvements developed to avoid any environmental or ecological impacts to the river bank
- Clearance under the A27 suitable to accommodate NMUs, including

- horses (min 3.4m increasing to 3.87m)*
- No journey diversions required for NMUs travelling to and from the west due to crossing infrastructure provided at the new site access roundabout on the A27*
 - Minimal additional journey time (approximately 110 seconds) for pedestrians using the NMU route travelling from the east when accounting for existing delay associated with signals at the Sussex Pad junction*
 - Reduced journey time for cyclists (approximately 30 seconds) for cyclists using the NMU route travelling from the east when accounting for existing delay associated with signals at the Sussex Pad junction*
 - New route provided for equestrians considered to be beneficial compared to having to negotiate A27 with high traffic flows and high traffic speeds, with horses having to wait in the A27 central reserve and only a less than 1 metre footway to link to The Drive or a verge to link to Coombes Road, with horses having to travel directly adjacent to the A27.*

Conclusion of Agreed Position

As part of the access strategy to deliver Local Plan development on the New Monks Farm and Shoreham Airport sites, via the creation of a new signalised roundabout on the A27 located between these sites, it is a requirement of Highways England that the traffic signal control at the Sussex Pad junction is removed. Alternative and improved provision for NMUs has been considered through the Transport Steering Group.

It is agreed that the proposed access roundabout provides safe crossing facilities for NMUs and would provide links into South Downs National Park (SDNP). The roundabout access including provision for NMUs has been through the safety audit process which confirms the design is safe, including the accommodation of NMUs.

It has been agreed that an additional route into SDNP will be provided by upgrading the existing PRoW 2049 to a bridleway, allowing use by cyclists and equestrians, running from Old Shoreham Toll Bridge, to connect with a proposed new bridleway running east/west to link to Coombes Road. The new bridleway link benefits from a planning approval from SDNP Authority and is deliverable within the highway boundary of the A27.

It is agreed that the proposals within the A27 highway boundary maintained by Highways England are in accordance with the standards for NMU provision included within the Design Manual for Roads Bridges, specifically Section 2.2.11 of IAN 195/16 Cycle Lane and Cycle Track Widths and TD 90/05 The Geometric Design of Pedestrian, Cycle and Equestrian Routes, specifically paragraphs 7.16 to 7.23 dealing with Shared and Adjacent Use Routes for NMUs.

With respect to the River Adur PRoW improvement, it is agreed that the design of this is of adequate width to safely accommodate anticipated NMU

movements. It is also agreed that the provision of a grade separated route under the A27 will provide benefits compared to NMUs having to cross at the Sussex Pad junction, by totally removing conflicts with high speeds and high flow traffic conditions, benefiting comfort, safety and the perception of safety, so making the route into the SDNP more attractive.

In summary, the New Monks Farm development will deliver access to the SDNP at the proposed new roundabout junction, through dedicated facilities for NMUs, and via the proposed NMU link from Old Shoreham Toll Bridge to Coombes Road. The proposals therefore provide an additional link to the SDNP, compared to the existing situation of the poor facilities at the existing Sussex Pad junction. In conclusion, it is agreed that the proposals will provide enhanced accessibility for NMUs from Lancing and Shoreham-by-Sea to the SDNP.

Thus, it is agreed that the NMU proposals accord with Policy 5 of the Adur Local Plan providing improved cycle, pedestrian and equestrian links to Lancing, Shoreham-by-Sea and the South Downs National Park.”

Natural England comments that,

“Thank you for providing a copy of the most recent iteration of the Design Code for this proposal. We understand the Design Code has been amended to include suggestions made by Natural England and the South Downs National Park Authority.

The influence of this site on the setting of the South Downs National Park and the sensitivity of the site with regard to landscape and visual impacts are explained in our previous response dated 24 July 2018. These comments remain valid.

At this outline application stage, Natural England still has concerns regarding the landscape and visual impacts of this proposal, however we accept the Design Code as a framework to guide the design of mitigation measures at later application stages. Nevertheless, Natural England has significant concerns regarding the proposed height of the buildings and the approach to landscape planting as the principal approach to mitigation. We stress that the importance of securing robust mitigation at the earliest possible stages of the application should not be undervalued, and provide the following advice:

Landscape and Visual Impacts

We note that the Design Code includes reference to maximum building heights. We welcome a defined limit to the building heights, which will restrict the impact of the scale of the building(s) to some extent. However, we are concerned that the maximum height of the northern element would be 13 m, some 3 m higher than the existing Ricardo building to the north. Introducing a higher building does not contribute to the (presumably) intended effect of reducing the visual impact of the building by stepping the building heights down from north to south. The effect would however be more effective if the tallest building height matched that of the adjacent site, i.e. 10 m. Limiting the height of the new buildings to that of existing buildings would allow the units to

sit behind the already developed Ricardo site, preventing the addition of overly dominant structures, and would help integrate the new buildings with the surrounding the open landscape.

Our previous correspondence (24 July 2018) agreed with the (as then current) Design Code that tree screening would not serve as suitable mitigation due to the existing open airport landscape. We are concerned that this is no longer reflected in the current iteration of the Design Code. We agree with the general principle of reducing the density of planting towards the south of the site, however, tree screening should not form the principal approach to mitigating the landscape and visual impacts of this proposal. We will be happy to provide more detailed advice to help guide mitigation proposals as the application progresses.

The proposed colour palette has been selected to reflect the natural surroundings of the site. We trust that subsequent stages of this application can utilise this colour palette to ensure that the buildings are well integrated into the surrounding landscape. We are also pleased to see that curved roof forms will be considered at a later, detailed planning stage, and we will be happy to advise on this aspect of the application in due course.

The inclusion of wildflower mixes to increase biodiversity is supported, however references within the Design Code to increasing biodiversity is limited. We note that the Design Code does not include any reference to the inclusion of living green roofs and walls, the benefits of which are detailed in our previous response. Living green roofs and walls will help ease the visual transition between the built elements of this proposal and the undeveloped areas within the surrounding landscape, can provide for biodiversity and can contribute to green infrastructure and net gain requirements. At this stage, we would highlight that green roofs and walls require low levels of management, can be self-sustaining and can enhance building performance. Larger scale, but local examples of how living roofs can contribute to landscape mitigation include Peacehaven Wastewater Treatment Works¹ and Rolls Royce manufacturing plant and head office in Chichester². Case studies of smaller scale green roofs in the South East, together with examples of living walls are also available³. We stress that these approaches can be a cost effective approach to mitigation and we would be happy to support and advise on this aspect of the proposal in due course.

Adur Estuary SSSI

The updated design code states that there will be a 12 m buffer along the eastern edge of the site. This will provide some distance between the built form of the site and the adjacent SSSI. This landscape buffer should remain as an undisturbed area, with vehicular access located to the western side of the site. Locating buildings on an east-west axis maximises the potential for creating visual gaps across the site, which we would support. We also support the lighting guidelines which ensure that there will be no measurable impact from lighting onto sensitive receptors including the River Adur."

Historic England

Whilst a further formal consultation response from Historic England has not been received it has provided the following comments (via email) on the

potential heritage benefit that the development would secure for the future viability of the airport and repairs to the listed Terminal Building and Hanger.

“The code makes the obvious moves with regards to options for building heights and orientation and landscaping etc but these are, as you say mitigation. They will do little to address the fundamental change from open landscape to built commercial area “vibrant” or otherwise. The lighting etc is what you would expect.

This proposal presents a particularly difficult issue for us because this is basically speculative with no tenants identified and therefore no clearly identified and secured stream of income as I understand it from the document. Therefore securing the benefits of the “cross subsidy” seems even more tricky and once the principle for the development goes ahead then it is unlikely to ever be rescinded. If the airport folds between permission and implementation what happens?

On viability- it seems to me that the 15,000 is only unviable in the context of trying to save the airport- presumably there is demand for the 15000sqm in “isolation” and describing up to 25,000sqm (in reality it will be 25,000sqm) as small increase in the code seems to misrepresent the scale of what is now being proposed.

We (HE) do not have the relevant information (and it could be said expertise?) to forensically examine and investigate the likelihood of success in securing the future of the site as an airport by permitting this proposal, but matters are not helped by the fact that the good repair of the Terminal buildings is required by the existing lease- presumably known about by the operators when they took it on- and yet clearly has not been fulfilled. The freeholders have therefore failed to enforce the lease conditions and it is problematic to then enforce them through proposing harmful new development. There is an argument that this repair if being used as justification for the development should not be considered as a benefit in favour of the scheme under the NPPF (see paragraph 191) although how far this is deliberate neglect in the meaning of the policy in this case is obviously debatable.

I think the whole issue of optimum viable use here is critical to the planning balance and obviously one with which you are grappling!”

3. Additional Representations

Since the Committee report was prepared, a further **5 letters of objection** have been received on the grounds that.

- i) It will overload existing roads which are already gridlocked twice daily and create more noise and pollution (A27 and A283).
- ii) Why are more units needed to be built when there are at least eight empty units on the southern end of the Airport.

- iii) Once developed this greenfield site will be lost forever along with existing wildlife.
- iv) Why are developers allowed to get rich at the expense of local residents.
- v) This is overdevelopment and contrary to the Local Plan.
- vi) With many issues tied in with the New Monks Farm development, joint viability should not be an overriding consideration.
- vii) The developers have grossly underestimated the infrastructure costs and Adur Residents and Visitors should not have to suffer the consequences.
- viii) The development is unsightly and unnecessary in this location.
- ix) The buildings will obscure a beautiful view enjoyed by many who use the riverside path and approach by the Amsterdam/Red Lion pubs.
- x) This could be the 'tip of the iceberg' and lead to other requests.
- xi) The Inspector indicated that the development did not need to be adjacent to the Toll Bridge and Ricardos as the buildings could be accommodated on the open car parks on the south edge of the Airport.
- xii) The Local Plan Inspector was also concerned about the preservation of the green gap, to provide open views and prevent coalescence.
- xiii) The view of the Airport and openness will be blocked by these buildings, particularly from the Toll Bridge when walkers and cyclists stop to enjoy the views.
- xiv) After all the careful consideration of the placement of the memorial to the crash victims by the Toll Bridge, the iconic and relevant backdrop of the Airport will be obscured by the development.
- xv) Adur's Economic Strategy aims for 'good growth' not growth at any price but growth that sustains our natural assets and environment. The development does not comply with that Strategy.
- xvi) Current statistics show that unemployment in Adur is lower than the national average but pay is less than the national average. Adur's Economic Strategy is committed to providing 'the development of a learning and skills system' and opportunities for skilled jobs. The development would provide mainly low skilled, low paid jobs and would conflict with Adur's own Economic Strategy.
- xvii) If the development was for office space it would provide more skilled employment and if it was further south it would meet the objectives of

the Local Plan, Adur's Economic Strategy, meet the needs and wishes of the people of Adur and the relatives and friends of Shoreham Airport disaster.

4. Planning Assessment

As stated in the Agenda report, there are concerns about the impact of the development on the landscape, local green gap and setting of heritage assets. Balanced against this are the operational issues involved with identifying suitable land for new employment floorspace, the viability of the current Local Plan allocation, the need for new commercial floorspace and the future financial position of the Airport which is currently in administration. On balance, it is considered that the public benefits of the development including the creation of new jobs, bringing the Airport out of administration and helping secure its future economic prosperity are compelling and would help to justify the proposed development. These are material considerations which would justify allowing the development contrary to the recently adopted Local Plan.

On air quality, mitigation has already been put forward in connection with the New Monks Farm development, however, the applicant is willing to install EV points as part of the development and once occupiers are known there is the opportunity to encourage sustainable modes of transport through the requirement to submit and agree Travel Plans.

The amended Design Code is now acceptable addressing the various issues raised in the Agenda and, therefore, the recommendation is amended as below:

5. Recommendation

On balance, it is recommended that outline planning permission be granted subject to a s106 agreement securing necessary development contributions, a variation of the original s52 Agreement, the Secretary of State confirming that he does not wish to call in the application for his determination and the conditions set out in the Agenda.