



# ADUR DISTRICT COUNCIL

9 July 2021

Adur Planning Committee	
Date:	19 July 2021
Time:	7.00 pm
Venue:	QEII Room, Shoreham Centre, Shoreham-by-Sea

**Committee Membership:** Councillors Carol Albury (Chair), Stephen Chipp (Vice-Chairman), Dave Collins, Tania Edwards, Jeremy Gardner, Paul Mansfield, Steve Neocleous and Carol O'Neal

**NOTE:**

Anyone wishing to speak at this meeting on a planning application before the Committee should register by telephone (01903 221006) or e-mail [democratic.services@adur-worthing.gov.uk](mailto:democratic.services@adur-worthing.gov.uk) before noon on Friday 16 July 2021.

## Agenda

### Part A

#### 1. Substitute Members

Any substitute members should declare their substitution.

#### 2. Declarations of Interest

Members and Officers must declare any disclosable pecuniary interests in relation to any business on the agenda. Declarations should also be made at any stage such an interest becomes apparent during the meeting.

If in doubt contact the Legal or Democratic Services representative for this meeting.

Members and Officers may seek advice upon any relevant interest from the Monitoring Officer prior to the meeting.

### 3. Public Question Time

So as to provide the best opportunity for the Committee to provide the public with the fullest answer, questions from the public should be submitted by midday on Thursday 15 July 2021.

Where relevant notice of a question has not been given, the person presiding may either choose to give a response at the meeting or respond by undertaking to provide a written response within three working days.

Questions should be submitted to Democratic Services –  
[democratic.services@adur-worthing.gov.uk](mailto:democratic.services@adur-worthing.gov.uk)

(Note: Public Question Time will last for a maximum of 30 minutes)

### 4. Confirmation of Minutes

To approve the minutes of the Planning Committee meetings of the Committee held on 5 July 2021, which have been emailed to Members.

### 5. Items Raised Under Urgency Provisions

To consider any items the Chair of the meeting considers urgent.

### 6. Planning Applications (Pages 1 - 106)

To consider the reports by the Director for the Economy, attached as Item 6.

a) AWD/1906/20 Officer Powerpoint Presentation (Pages 107 - 126)

### 7. Planning Appeals

## Part B - Not for publication - Exempt Information Reports

#### Recording of this meeting

Please note that this meeting is being live streamed and a recording of the meeting will be available to view on the Council's website. This meeting will be available to view on our website for one year and will be deleted after that period. The Council will not be recording any discussions in Part B of the agenda (where the press and public have been excluded).

For Democratic Services enquiries relating to this meeting please contact:	For Legal Services enquiries relating to this meeting please contact:
Heather Kingston Democratic Services Officer 01903 221006 <a href="mailto:heather.kingston@adur-worthing.gov.uk">heather.kingston@adur-worthing.gov.uk</a>	Richard Burraston Locum Lawyer

**Duration of the Meeting:** Four hours after the commencement of the meeting the Chairperson will adjourn the meeting to consider if it wishes to continue. A vote will be taken and a simple majority in favour will be necessary for the meeting to continue.

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ADUR DISTRICT  
COUNCIL

Planning Committee  
19 July 2021

Agenda Item 6

Ward: ALL

Key Decision: No

Report by the Director for Economy

Planning Applications

1

Application Number: AWD/1906/20      Recommendation – Approve

Site:            Land And New Roundabout Northern Boundary Of A27 To East And West Of Coombes Road Old Shoreham Road

Proposal: Highway works comprising; (1) construction of a highway (a Fourth Arm) from the approved New Monks Farm A27 roundabout to Coombes Road (west) along with associated hard and soft landscaping, and; (2) closure of the existing Coombes Road (east) junction with the A27 and its replacement with landscaping. The application is accompanied by an Environmental Statement.

<b>Application Number:</b>	<b>AWDM/1906/20</b>	<b>Recommendation - Approve</b>
<b>Site:</b>	<b>Land And New Roundabout Northern Boundary Of A27 To East And West Of Coombes Road Old Shoreham Road</b>	
<b>Proposal:</b>	<b>Highway works comprising; (1) construction of a highway (a Fourth Arm) from the approved New Monks Farm A27 roundabout to Coombes Road (west) along with associated hard and soft landscaping, and; (2) closure of the existing Coombes Road (east) junction with the A27 and its replacement with landscaping. The application is accompanied by an Environmental Statement.</b>	
<b>Applicant:</b>	<b>Mr Perry / Mr Milling</b>	<b>Ward: Manor</b>
<b>Agent:</b>	<b>Mr Peter Rainier</b>	
<b>Case Officer:</b>	<b>James Appleton</b>	



**Not to Scale**

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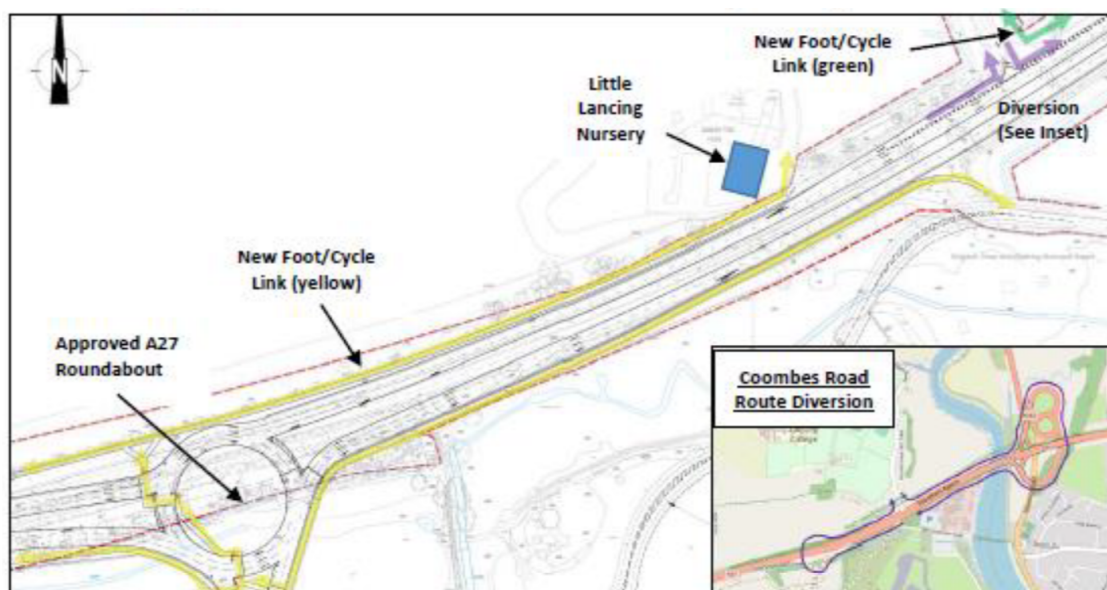
## Background

Planning permission was granted for the strategic housing development at New Monks Farm and for a new non-food retail store (Ikea) on the 4th February 2020 following the completion of a s106 agreement. The development description is set out below:

*'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.'*

The application was originally deferred by the Planning Committee in view of concerns about the visual impact of the new Ikea store and the lack of a 4th arm serving Lancing College. During the deferment period the applicant reached an agreement with Lancing College that they would pursue the provision of a 4th arm following the grant of planning permission for the above development. Highways England and West Sussex County Council had stated that the inclusion of the 4th Arm was not a requirement of the access strategy for the New Monks Farm development.

At the same time permission was granted for 25,000 sqm of new commercial floorspace at Shoreham Airport to be accessed from the new A27 roundabout. The approved roundabout closed the existing signalised junction at Coombes Road (including the pedestrian crossing point) but retained a left in and left out junction for Coombes Road. The approved roundabout and access arrangement for Coombes Road is shown below with the inset identifying the diversion necessary for Coombes Road traffic wanting to travel westbound along the A27.



The approved strategic development at New Monks Farm involves the construction of the new roundabout off line, to the south of the existing carriageway, with the land to the north comprising a grassed verge and a cycle path/footway alongside the newly realigned A27 connecting to Coombes Road (west).

The loss of the signalised and 'at grade' pedestrian crossing (used by cyclists and horse riders) was a controversial aspect of the New Monks Farm development and some Members will recall that the planning application was amended to address this concern by proposing to upgrade the existing riverside footpath which passes under the A27 adjacent to a bridlepath. A parallel application to the National Park (SDNP/18/00434/FUL) was approved to extend this bridlepath route on the north side of the A27 to connect to Coombes Road (Footpath 2049). The current application does not affect this alternative route for non motorised users (other than the removal of the southern section of Coombes Road would enhance this route).

### **The Site and the Proposal**

The site comprises an area of land approximately 2.1 hectares in size which runs along the northern side of the A27 from the southern end of Coombes Road, to the proposed new roundabout on the A27 to serve New Monks Farm strategic housing and employment allocation. The site partly includes the existing A27 highway and the landscaped embankment which lies directly to the north (and within the South Downs National Park). There are several trees and tree groups within the northern boundary of the site and immediately outside of its boundary (broadly comprising plantation woodland along the highway embankment). The main tree species present comprise Common Hawthorn, Common Sycamore, Ash and Elder.

As indicated above the proposed development is for the construction of a "Fourth Arm" to the approved New Monks Farm A27 roundabout and a new section of highway to run along the northern side of the A27 to the southern end of Coombes Road. It encompasses the western arm of Coombes Road, which includes the junction with The Drive which in turn connects with the main Coombes Road carriageway. The southern section of Coombes Road linking with the A27 would be closed and a section of road taken up (retaining an existing access to land on the east side of Coombes Road).

The new fourth arm would provide a new route for all traffic using Coombes Road, dwellings and other properties at the southern end of the road, and a new link to The Drive, which is the main access for the Lancing College Estate. The application is submitted jointly by Lancing College and the Community Stadium Ltd developing the infrastructure for New Monks Farm. The application proposes to address the access issues highlighted above and avoid any diversion to the Steyning Road roundabout for traffic seeking to travel westbound from Coombes Road.

The application site lies within the administrative boundaries of both Adur District Council and the South Downs National Park (SDNP). Therefore, planning permission is

required from both authorities for the development to be implemented and an identical Planning Application has been submitted to each Authority. It is understood that the Park Committee will consider the application in August.

### **Applicants Supporting Statements**

The applicant has submitted an Environmental Impact Assessment in support of the application covering the following matters:

<b>Environmental Statement Chapter</b>	<b>Author</b>
Transport and Access	Vectos
Noise and Vibration	Vanguardia
Air Quality	Phlorum
Water Resources	Civil Engineering Practice
Ecology and Nature Conservation	Ecology Partnership
Landscape and Visual Impact	Hyland Edgar Driver

The application also includes the following supporting statements which are available to view on the website:

<b>Application Drawings</b>	<b>Author</b>
Highway Drawings	Vectos
Landscape Drawings	Hyland Edgar Driver
Design and Access Statement	Hyland Edgar Driver
Tree Survey	CBA Trees
Lancing College Statement	Teal Planning
Statement of Community Involvement	Marshall Regen
Planning Statement	DMH Stallard
Heritage Statement	PCA Heritage
Ecosystem Services Statement	Hyland Edgar Driver and DMH

The **Planning Statement** concludes that:

*“This Planning Statement is written on behalf of The Community Stadium Limited & Lancing College (the Applicants) in respect of a Planning Application seeking permission for highway works comprising; (1) construction of a highway (a Fourth Arm) from the approved New Monks Farm A27 roundabout to Coombes Road (west) along with associated hard and soft landscaping, and; (2) closure of the existing Coombes Road (east) junction with the A27 and its replacement with landscaping.*

*The Proposed Development represents an enhancement of the access proposals permitted in respect of the New Monks Farm development by improving accessibility to Coombes Road (East/West) and The Drive. As set out within the statement from Lancing College, this is required to support and enhance the sustainability of the College and other businesses off Coombes Road. Consequently, it is considered that the proposals are supported by Policies SD19, SD34 and SD43 of the SDNPLP.*

*Whilst minor harm has been identified from specific and limited viewpoints within the SDNP, our view is that the overall benefits of this proposal significantly outweigh this limited harm. In addition to the benefits set out above and as described in detail within the Lancing College Statement, other benefits that will be gained include: • An overall increase in the amount of woodland and scrub planting, as well as new wildflower grassland and SUDS features for the benefit of ecology and biodiversity. • Scrubbing up and planting of the current Coombes Road (East) junction with the A27 resulting in visual enhancements and improving east/west habitat links. • A reduction in the number of movements made along the A27 to access properties from Coombes Road (East/West), shortening of journey times and a subsequent reduction in emissions.*

*With regards to the purposes of the National Park, it has been demonstrated that the Proposed Development complies with these purposes and duties by: (1) supporting Lancing College’s ability to maintain its role of custodian of a major estate that forms a significant part of the wider National Park and whose wider public benefits packages are interlinked with the SDNPA’s own purposes and duties (as set out in Lancing College’s Statement); and (2) through the consideration of options for the 4th arm, seeking to firstly avoid any harm to the natural beauty, wildlife and cultural heritage of the 38 defg Park, and by the careful selection of detailed design choices for the new route (as set out within Section 2).*

*Any harm that cannot be avoided has been successfully mitigated so that any remaining harm is either minor or negligible on specific and limited views from within the SDNP, all of which are experienced within the context of the wider A27, in some instances the effects of the development are beneficial. In addition, the Proposed Development has sought and successfully secured opportunities to enhance wildlife within the Park by substantial new planting and the provision of sustainable drainage systems. With regards to its duties, the proposed new access will enhance accessibility to homes and businesses off Coombes Road (East/West) following completion of New Monks Farm; helping to ensure and foster the sustainability of these businesses, as*



*well as improving provision for cycle and pedestrian access to the Park.*

*A series of technical assessments have been carried out with regards to these proposals and confirm that they are acceptable in all other respects and in particular with regards to heritage assets, noise, air quality and highway safety. Consequently, we respectfully request that planning permission is granted for this proposal.”*

Lancing College as joint applicants has submitted a supporting statement. The following is the Executive Summary from the statement,

*Lancing College makes a significant contribution to both the local community and economy and is custodian of an estate that includes significant heritage assets and that provides a gateway to the wider SDNP.*

*It has previously been noted by the College and others, including Historic England, that any potential harm to the College’s operations must be avoided to ensure that the Lancing College Charitable Trust can continue to maintain the estate, including the internationally important Lancing College Chapel that carries significant on-going maintenance obligations but which, in light of the College’s oversight, attracts over 6,000 visitors each year.*

*The College’s social, environmental and economic roles are of local, national and international importance and directly contribute to and support both Adur District and the SDNPA in the delivery of their community and environmental roles, purposes and duties. The scale and breadth of these benefits are set out in the following Statement along with the reasons as to why a 4th arm on the proposed NMF A27 Roundabout is required.*

*The College’s provision of education, including supported school places, and the opening up of its estate and facilities for use by local schools, community groups and individuals, relieves pressure on state schools and local government facilities and on the cost of providing them. The College provides significant local employment and substantial multiplier benefits through its annual spending and linked supply chains. It also undertakes a breadth of significant environmental programmes, often in conjunction with Adur District, the SDNPA and other organisations, which positively contribute to the achievement of sustainable planning and to climate change agenda initiatives.*

*The forging of these links directly promotes and facilitates access to the SDNP and actively reduces the physical separation and the perception of severance that is created by the A27 between the coastal towns, the College estate and the National Park. The 4th arm link is required to ensure the College’s operations, income and ability to continue to maintain the same level of social, environmental and economic support is maintained and enhanced.*

*In the competitive environment in which the College operates, the withdrawal of the equivalent of just 20 full fee paying senior school pupils from the College during normal operating conditions prior to the onset of the Covid-19 pandemic (which the College hopes to be able to return to as quickly as possible) would result in the level of harm that must be avoided if its operations and benefits are to continue and are to be sustained. This is not to mention the further additional income that would be lost if other organisations and businesses that provide income for the College also elect to use competitor facilities.*

*NMF was granted planning permission by Adur Council in February 2020. NMF have agreed that they would pursue the approval and delivery of a 4<sup>th</sup> arm link, with associated NMU facilities, in collaboration with the College. The College's Trustees have diverted funds to pursue energetically the provision of the 4<sup>th</sup> arm link. This action has not been taken lightly but has been considered vital to ensure the College's ability to continue to provide its education and wide and far-reaching public benefits.*

*It should be noted that the school now faces additional great challenges associated with Covid-19 and Brexit. Around 30% of our pupils are from overseas and 60% of our pupils are boarders – these cohorts are particularly vulnerable to the practical and financial aspects of both the coronavirus and Brexit.*

*The school suffered a loss of fees and lettings of nearly £3m in the Summer Term 2020 alone, as the school provided remote education. Pupil numbers going into the new academic year look to be around 4% lower than in 2019/20. We are also incurring extra costs to keep our staff and pupils safe as we adjust to the new normal. Since the end of March 2020 there has been a freeze on all discretionary spending and staff have been furloughed or subject to a temporary pay cut. As our pupils return, we will need to reinstate much of this spending and indeed we have planned for higher costs for catering and cleaning staff and we will be investing in the school's facilities to create flexibility around space, extra handwashing facilities and in further IT improvements. Our staff continue to support the schools above and beyond our expectations and their pay will be fixed this year at pre-pay cut levels, as the school enters a period of recovery and regrowth.*

*The school is accordingly likely to be loss making for the next few years. The College can only withstand additional costs alongside reduced income, on a short term basis, by drawing on its reserves which will be significantly depleted as the post-Covid recovery phase is worked through.*

*At present, staffing levels and our supply chains remain intact and the College's wider economic links and community and environmental programmes can continue. This will in turn be of ever greater significance to our local suppliers and to the linked authorities and organisations that rely on and benefit from access to the Estate and to the College's facilities, when their own budgets are no doubt under increased pressure as a result of the pandemic and the full implementation of Brexit.*



*It is considered that the absence of a 4th arm link would significantly adversely affect the College's operations and its ability to maintain its income streams and support to other organisations and groups. The school required the support of Adur District and the SDNPA to achieve the new link prior to the Covid-19 pandemic and does so now more than ever.*

*In conclusion, the 4th arm will facilitate access to Lancing College and for other residents on Coombes Road. It will have very positive impacts for the wider local community, local schools and other organisations and users of the Estate and National Park, including Adur District and the National Park Authority. The planning application that has now been submitted will enable the 4th arm link to be provided. NMF's technical design team, in collaboration with Lancing College's own technical design team, have ensured that the link is designed to meet highway routing and safety standards and that it will sit appropriately alongside the A27, nested alongside and within the entrance to the College Estate and the National Park. Lancing College accordingly asks that the 4th arm is approved so that the work and benefits of the College can be protected and can continue over the long term."*

#### **AMENDED PLANS**

In response to representations and Consultation responses the applicants have provided various updates on various technical reports. In response to concerns from the National Parks landscape Officer and Highway Authorities a package of amended/additional application documents have been provided. These are as follows:

- Updated Plans and Design and Access Statement
- Updated Ecosystem Services Statement
- Landscape Addendum
- Transport Technical Note addressing comments from WSCC/HE in light of amended scheme.
- Biodiversity Metric Calculation and Statement (to follow on Monday)
- Drainage Technical Note

The applicants Agent summaries the key amendments as follows:

- *Removal of speed cushions, 'SLOW' markings and red coloured surfacing*
- *Removal of build out near the Nursery access*
- *Removal of the white centre line for the majority of the route (other than in proximity to the junctions)*
- *Route to be unlit other than to the section closest to western A27 roundabout as required by HE*
- *Introduction of granite setts to Nursery entrance and build out along straight length of road (with addition of a further tree subject to discussion with WCC)*
- *Introduction of tree planting to Swale to aid moisture retention*
- *Relocation of timber gateway features*

- *Reduction in kerb height alongside Coombes Road (West) properties (low aggregate kerb) and use of buff colour to footpath*
- *Introduction of timber bollards adjacent to housing and at north-eastern corner*
- *Replacement of non-native hedge with native hedge*
- *Introduction of rough grassland planting along northern boundary*
- *Additional broad leaf native tree planting*
- *Provision of a temporary post and rail fence on Coombes Road East to control access until new planting becomes established.*

*It is considered that these proposals reflect the existing local context of Coombes Road and also the guidance set out within 'Roads in the South Downs' whilst meeting the usage and highway safety requirements of the route. The proposed speed limit is set to be 30 mph throughout. Whilst the speed calming measures have now been largely removed, the curves either side (i.e. at the Nursery entrance and at the junction with The Drive) of the most sensitive section of the route will provide a natural control along this stretch, which assisted by the use of a contrasting footway colour and timber bollards, will combine to ensure speeds of less than 30 mph. The alteration of materials alongside the Coombes Road (West) properties will provide a route that is rural in character and will visually narrow the road (indicating to drivers that the nature of the road has changed aided by gateway features and granite setts). Overall, it is considered that these alterations positively respond to the comments raised by the SDNP Landscape Officer and now comply with the relevant guidance. The Transport Technical Note provides a further summary of the alterations and a discussion around the various alternatives that have been considered.*

*In addition to alterations to highway design, further amendments have been made to both hard and soft landscaping taking into account the request that all opportunities are taken to enhance the visual and ecological aspects of the proposal. As requested, this has included replacement of the non native hedge with a native hedge; introduction of tree planting to the swale; additional native broad leaf tree planting, which will help to address vehicle emissions and, provision of rough grassland planting to the north of the tree belt to the northern boundary of the Site. This is in addition to the more sensitive treatment of hard landscaping set out above, incorporating measures identified within 'Roads in the South Downs'. As you will see from the results of the Biodiversity Metric Calculation, the proposals will result in a very healthy net gain in biodiversity, significantly in excess of that being required under forthcoming legislation. In landscape terms, proposals to remove road clutter have helped to create a route which is rural in character and will ensure that the proposals protect the special qualities of the SDNP whilst providing enhanced connectivity, which is essential for the long term financial security of Lancing College, along with other rural businesses to the north of the A27 (as set out within statements from Lancing College).'*

A supplementary report has been prepared in relation to concerns from residents about **vibration** and this concludes that,

*It is therefore concluded that, due to the inherent design of the road construction and the proposed layout, vibration from road traffic is very unlikely to cause any adverse effects on amenity and/or structural damage at the buildings in question.”*

*The chapter in the EIA on **Landscape and Visual** has also been amended and now concludes:*

*Overall, taking into account the effects on the landscape character, the visual amenity and perceptual qualities, the site conserves and enhances the existing landscape. This is through the introduction of high quality planting in the form of woodland, tree and shrub planting as well as wildflower meadow, the latter which is particularly important for ecological mitigation, in addition to the iterative design process carried out with the aim to remove road clutter and create a route which is rural in character. A more detailed description of mitigation measures and enhancements and their benefits associated with ecosystem services is detailed in HED.1172.912 – Ecosystem Services Statement.*

*In Biodiversity terms the applicant's ecologists have identified a net gain of 22.59% and a summary plan has been identified highlighting enhancement opportunities.*

## **Consultations**

### ***Adur & Worthing Councils:***

The **Technical Services** Officer comments that,

*“We have the following comments on flood risk and surface water drainage.*

*Flood risk- the application has large areas within flood zone 3, there are also areas at risk from surface water flooding. The type of development proposed is compatible with this degree of flood risk.*

*Surface water drainage- the proposals are to attenuate surface water prior to discharge to the northern channel. We agree that infiltration is not suitable in this location due to the soil type and spring line. Winter groundwater monitoring should be completed to determine the flotation forces upon the proposed drainage features and to ensure that flotation resistance design is appropriate.*

*We would be keen to see the proposed discharge rate reduced to 2l/s to be compliant with policy and minimum achievable restrictions. We note the applicant's reasoning for not restricting to this rate, but would highlight that half drain time within 24 hours must be achieved for the 1 in 10 year plus 40% climate change event only. The proposed treatment methodology appears to be acceptable.*

*If you are minded to approve this application please apply the following conditions.*

*“Development shall not commence, other than works of site survey and investigation, until full details of the proposed surface water drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The design should follow the hierarchy of preference for different types of surface water drainage disposal systems as set out in Approved Document H of the Building Regulations, and the recommendations of the SuDS Manual produced by CIRIA. Winter groundwater monitoring to establish highest annual ground water levels will be required to support the design of any Infiltration drainage. No building / No part of the extended building shall be occupied until the complete surface water drainage system serving the property has been implemented in accordance with the agreed details and the details so agreed shall be maintained in good working order in perpetuity.”*

*and the accompanying informative:*

*“Any SuDS or soakaway design must include adequate groundwater monitoring data to determine the highest winter groundwater table in support of the design. The applicant is advised to discuss the extent of groundwater monitoring with the Council's Engineers. Further detail regarding our requirements are available on the following webpage <https://www.adur-worthing.gov.uk/planning/applications/submit-fees-forms>. A surface water drainage checklist is available on this webpage. This clearly sets out our requirements for avoiding pre-commencement conditions, or to discharge conditions”*

*“Development shall not commence until full details of the maintenance and management of the surface water drainage system is set out in a site-specific maintenance manual and submitted to, and approved in writing, by the Local Planning Authority. The manual is to include details of financial management and arrangements for the replacement of major components at the end of the manufacturer's recommended design life. Upon completed construction of the surface water drainage system, the owner or management company shall strictly adhere to and implement the recommendations contained within the manual.”*

*“The development shall not proceed until details have been submitted to and approved in writing by the Local Planning Authority for any proposals: to discharge flows to watercourses; or for the culverting, diversion, infilling or obstruction of any watercourse on or adjacent to the site. Any discharge to a watercourse must be at a rate no greater than the pre-development run-off values. No construction is permitted, which will restrict current and future land owners from undertaking their riparian maintenance responsibilities in respect to any watercourse or culvert on or adjacent to the site.”*

*and the accompanying informative:*

*“Under Section 23 of the Land Drainage Act 1991 Land Drainage Consent must be sought from the Lead Local Flood Authority (West Sussex County Council), prior to starting any works (temporary or permanent) that affect the flow of water in an ordinary watercourse. Such works may include culverting, channel diversion, discharge of flows, connections, headwalls and the installation of trash screens.*

*The development layout must take account of any existing watercourses (open or culverted) to ensure that future access for maintenance is not restricted. No development is permitted within 3m of the bank of an ordinary watercourse, or 3m of a culverted ordinary watercourse.”*

*“Further to my earlier comment I would like to highlight that the proposed location is at/ very close to the location where emergent springs have caused flooding to the A27, with the eastbound carriageway having to be reduced or closed on multiple occasions. Flooding events here include 2010, 2012, 2013, and 2019.*

*The applicants FRA states there are no recorded flooding incidents in the vicinity, this is incorrect. The FRA also fails to go into any detail on the groundwater flooding issues here and we would like to see further consideration of this matter. Specifically better identification of the flood risk currently posed, and what impact development will have upon this source of flooding.”*

*Following the receipt of further information **Technical Services raises no objection** to the development and comment that:*

*Further to the applicants revised FRA I would like to confirm my comments are as follows.*

- *The discharge rate has been reduced from the original proposals. The rate now reached balances issues of; reducing offsite flows, minimising the risk of blockage, storage availability, and half drain time requirements. We are happy for the rate of 2.9l/s to be taken forwards.*
- *The rewording of sections of the FRA to elaborate on the current flood risk to the A27 and how this will be tackled is reassuring.*
- *We will work with the designers of the A27 drainage to try to ensure that the new drainage design addresses the historic issues in the area.*

*We have no objections to the proposals. If you are minded to approve this application please apply the following conditions.*

*“Development shall not commence, other than works of site survey and investigation, until full details of the proposed surface water drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The design should follow the hierarchy of preference for different types of surface water drainage disposal systems as set out in Approved Document H of the Building Regulations, and the recommendations of the SuDS Manual produced by CIRIA. Winter groundwater monitoring to establish highest annual ground water levels will be required to support the design of any SuDS drainage. The carriageway shall not be taken into use until the complete surface water drainage system serving the carriageway has been implemented in accordance with the agreed details and the details so agreed shall be maintained in good working order in perpetuity.”*

*“Development shall not commence until full details of the maintenance and management of the surface water drainage system is set out in a site-specific maintenance manual and submitted to, and approved in writing, by the Local Planning Authority. The manual is to include details of financial management and arrangements for the replacement of major components at the end of the manufacturer's recommended design life. Upon completed construction of the surface water drainage system, the owner or management company shall strictly adhere to and implement the recommendations contained within the manual.”*

*“The development shall not proceed until details have been submitted to and approved in writing by the Local Planning Authority for any proposals: to discharge flows to watercourses; or for the culverting, diversion, infilling or obstruction of any watercourse on or adjacent to the site. Any discharge to a watercourse must be at a rate no greater than the pre-development run-off values. No construction is permitted, which will restrict current and future land owners from undertaking their riparian maintenance responsibilities in respect to any watercourse or culvert on or adjacent to the site. “*

The **Environmental Health Manager** raises no objection to the application and comments that,

*There are already high ambient noise levels in the vicinity and the guidance is pretty clear. The increase in noise has to be due to the new or altered road and not due to increases elsewhere on the system.*

*The data is only showing a 0.1dB increase because of the traffic and this will be negligible over the time period.*

*I have not seen any evidence to suggest operational vibration from the use of the road will have any detriment to the existing residents and there are no EH concerns here.*

*The applicant's acoustician addresses this point by pointing out the research by the British Standards Institution states, "There is little probability of fatigue..." copied in full below.*

*Table of British Standard BS 7385-2 (reproduced in figure 2) provides UK limits for transient vibration, above which cosmetic damage could occur, and states that: There is little probability of fatigue damage occurring in residential building structures due to either blasting, normal construction activities or vibration generated by either road or rail traffic.”*

Table 1 - Transient vibration guide values for cosmetic damage			
Line (see Figure 1)	Type of Building	Peak component particle velocity in frequency range of predominant pulse	
		4 Hz to 15 Hz	15 Hz and above
1	Reinforced or framed structures. Industrial and heavy commercial buildings	50mm/s at 4 Hz and above	
2	Unreinforced or light framed structures. Residential or light commercial type buildings	15mm/s at 4 Hz increasing to 20mm/s at 15Hz	20mm/s at 15Hz increasing to 50mm/s at 40Hz and above
<p><b>NOTE 1</b> Values referred to are at the base of the building (see 6.3).</p> <p><b>NOTE 2</b> For line 2, at frequencies below 4Hz, a maximum displacement of 0.6mm (zero to peak) should not be exceeded.</p>			

*The potential impacts of predicted changes in road traffic noise have been assessed using semantic descriptors which give a guide to the magnitude of the impacts. These semantic descriptors are based on those for impacts in the long term presented in Table 3.2 of Part 7 of the Design Manual for Roads and Bridges (DMRB). They are reproduced in Table 8.1 below.*

Noise Changes (Long Term) LA10, 18h (dB)	Magnitude of Impact
0	No Change
0.1 - 2.9	Negligible
3.0 - 4.9	Minor
5.0 - 9.9	Moderate
10+	Major

**Table 8-1 Classification of Magnitude of Long Term Road Traffic Noise Impacts**

**West Sussex Local Lead Flood Authority** comments that,

*“The following are the comments of the LLFA relating to surface water drainage and flood risk for the proposed development and any associated observations, recommendations and advice.*

<i>Current surface water flood risk based on 30year and 100year events</i>	<i>Medium and High risk</i>
<p><i>Comments: Current surface water mapping shows that the proposed site has areas at high risk (3.3% Annual Exceedance Probability (AEP) and medium risk (1% AEP) from surface water flooding.</i></p> <p><i>This risk is based on modelled data only and should not be taken as meaning that the site will/will not definitely flood in these events. Any existing surface water flow paths across the site should be maintained and mitigation measures proposed for areas at high risk. Reason: NPPF paragraph 163 states – ‘When determining any planning application, local planning authorities should ensure flood risk is not increased elsewhere.’</i></p>	

<i>Modelled groundwater flood hazard classification</i>	<i>Medium and High risk</i>
<p><i>Comments: The area of the proposed development is shown to be at medium and high risk from groundwater flooding based on current mapping. This risk is based on modelled data only and should not be taken as meaning that the site will/will not suffer groundwater flooding.</i></p> <p><i>Ground water contamination and Source Protection Zones - The potential for ground water contamination within a source protection zone has not been considered by the LLFA. The LPA should consult with the EA if this is considered as risk.</i></p>	

<i>Watercourses nearby?</i>	<i>Yes</i>
<p><i>Comments: A network of Ordinary Watercourses exist in the New Monks Farm site to the south of the site and the applicant is proposing a controlled discharge to one of these watercourses from the attenuation storage. Local or field boundary ditches, not shown on Ordnance Survey mapping, may exist around or across the site. If present these should be maintained and highlighted on future plans. Works affecting the flow of an ordinary watercourse will require ordinary watercourse consent and an appropriate development-free buffer zone should be incorporated into the design of the development.</i></p>	



Records of any surface water flooding within the site?	Yes
Comments: The A27 experiences flooding between the Manor Roundabout and Sussex Pad. This particularly affects the eastbound carriageway, consistent with the Risk of Surface Water Flooding map; for example, this carriageway was closed for 7 hours during December 2019 due to flooding.	

### **Future development - Sustainable Drainage Systems (SuDS)**

1. The LLFA requires all applications to comply with the West Sussex LLFA Policy for the Management of Surface Water:

[https://www.westsussex.gov.uk/media/12230/ws\\_llfa\\_policy\\_for\\_management\\_of\\_surface\\_water.pdf](https://www.westsussex.gov.uk/media/12230/ws_llfa_policy_for_management_of_surface_water.pdf) cited in paragraph 2.2.3 of the applicant's FRA.

2. Calculation of attenuation storage for this proposal is not consistent with paragraph 5.3.3 of the LLFA Policy for the Management of Surface Water. Use of the default value for CV is inappropriate when solely considering the impermeable area. Therefore, the LLFA considers the volume of storage required to have been under-estimated. The LLFA recommends that the applicant re-calculates the appropriate volume of attenuation storage required adhering to LLFA policy and best practice.
3. JBA groundwater flood risk data shows that attenuation storage sits within a Medium / High risk of groundwater flooding where groundwater levels for a 1:100year event are likely to be between 0.5m and the surface. On this basis, further detail is sought on the attenuation storage design to ensure that both the volume of storage proposed is appropriate and the design is consistent with minimising the risk of groundwater / surface water infiltration and flotation. In addition, the applicant is directed to paragraph 5.4.5 and Figure 5.1 of the LLFA Policy for the Management of Surface Water to which storage proposals should comply.
4. It is noted from the Location Map that the boundary for the New Monks Farm development now extends north of the A27. While it is noted that the northern extent of Adur District does not extend north of the A27 in the vicinity of the development, the LLFA has neither been consulted on nor been made aware of any proposals for the New Monks Farm development to extend northwards beyond the A27, that is with the exception of this fourth arm highways application. Clarification from the SDNPA is sought on the land use policy for the west bank of the River Adur north of the A27 in the area delineated by the Ownership boundary New Monks Farm."

## **West Sussex Local Lead Flood Authority (Further Comments),**

*The Lead Local Flood Authority (LLFA) within West Sussex County Council has been approached for further comments on the above planning application in the light of additional information submitted (References B and C). The LLFA notes that, contrary to its comments in Reference A, appropriate values are being used in the calculation of volumetric runoff and storage of stormwater.*

*The LLFA notes the clearance that the applicant has undertaken of the existing A27 culverts to the northern ditch, agrees that the maintenance neglect of the same may in part explain the longstanding issues with drainage of the A27 at this location. Additionally, the LLFA has now reviewed the proposed drainage arrangements for the related A27 works. Upon discussion with Adur Worthing Council it is agreed that this separate application, more than the Coombes Road application, should be the focus for resolving existing surface water flooding on the A27.*

*It is noted that the Applicant has agreed with Adur Worthing Council to restrict run-off to a reduced rate of 2.9l/s and this is welcome. The clarification made in Reference C to the underlying flooding issues associated with the A27 and the means of remediating them are helpful.*

*The LLFA is now happy to **withdraw any outstanding objections** to the application and recommend it for approval, subject to the following condition:*

*Cellular storage incorporated into the proposed Drainage is to be consistent with the design set out in Figure 5.1 of the West Sussex LLFA Policy for the Management of Surface Water.*

The **Environment Agency** has no objections subject to the imposition of the following conditions:

### *Condition 1 – Remediation strategy*

*No development approved by this planning permission shall commence until a remediation strategy to deal with the risks associated with contamination of the site in respect of the development hereby permitted, has been submitted to, and approved in writing by, the Local Planning Authority. This strategy will include the following components:*

1. *A preliminary risk assessment which has identified:*
  - *all previous uses;*
  - *potential contaminants associated with those uses;*
  - *a conceptual model of the site indicating sources, pathways and receptors;*
  - and*

- *potentially unacceptable risks arising from contamination at the site.*
2. *A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off-site.*
  3. *The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.*
  4. *A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.*

*Any changes to these components require the written consent of the Local Planning Authority. The scheme shall be implemented as approved.*

#### *Reasons for condition 1*

*This development is sited on superficial deposits (alluvium, head and raised beach deposits) overlying the Newhaven Chalk, designated Secondary A and Principal Aquifers respectively. The area to the North West where a hotel is indicated on the OS mapping is underlain by the Sussex Pad historic landfill, which we understand is an infilled former sand and gravel pit. However, we do not have any information on the nature of material used to infill the pit and there is the potential for contaminated land to be present.*

*The previous use of the proposed development site as a historic landfill presents a medium risk of contamination that could be mobilised during construction to pollute controlled waters. As stated above, controlled waters are particularly sensitive in this location because the proposed development site is located upon a Principal Aquifer and Secondary Aquifer A.*

*The submitted Environmental Statement demonstrates that it will be possible to manage the risk posed to controlled waters. Further detailed information will however be required before built development is undertaken. We believe that it would place an unreasonable burden on the developer to ask for more detailed information prior to the granting of planning permission, but respect that this is a decision for the Local Planning Authority.*

*In light of the above, the proposed development will be acceptable if a planning*

*condition is included requiring the submission of a remediation strategy. This should be carried out by a competent person in line with paragraph 178 of the National Planning Policy Framework (NPPF).*

*Without this condition we would object to the proposal in line with paragraph 170 of the NPPF because it cannot be guaranteed that the development will not be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution.*

### **Condition 2 - Verification report**

***Prior to any part of the permitted development being brought into use, a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and approved in writing, by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.***

### **Reasons for condition 2**

*To ensure that the site does not pose any further risk to human health or the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with paragraph 170 of the NPPF.*

**Condition 3 - Previously unidentified 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 a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the Local Planning Authority.*

***The remediation strategy shall be implemented as approved.***

### Reasons for condition 3

*To ensure that the development does not contribute to, is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraph 170 of the NPPF.*

### Condition 4 - SuDS Infiltration of surface water into ground

**No drainage systems for the infiltration of surface water to the ground are permitted other than with the written consent of the Local Planning Authority. Any proposals for such systems must be supported by an assessment of the risks to controlled waters. The development shall be carried out in accordance with the approved details.**

### Reasons for condition 4

*The previous use of the proposed development site as a historic landfill presents a medium risk of contamination that could be mobilised by surface water infiltration from the proposed sustainable drainage system (SuDS). This could pollute controlled waters. As stated previously, controlled waters are particularly sensitive in this location.*

*In light of the above, we do not believe that the use of infiltration SuDS is appropriate in this location. We therefore request that the above planning condition is included as part of any permission granted. Without this condition we would object to the proposal in line with paragraph 170 of the NPPF because it cannot be guaranteed that the development will not be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution.*

**Please notify us immediately if you are unable to apply our suggested conditions, to allow further consideration and advice.**

### Advice to the Local Planning Authority and Applicant

*Whilst the proposed link road is shown to be within a tidal Flood Zone 3 (high risk) based on the development criteria, we have no objection on flood risk grounds. However, we would comment that, as highlighted in the Civil Engineering Practice Flood Risk Assessment (3.4.2, 5.3.2 and 6.2.4), the location of the slip road is in an area of groundwater emergence and springs. This has been clearly evident as on occasion the existing carriageway has flooded, and has been reduced to one lane. Regarding the surface water disposal method(s), the Lead Local Flood Authority must*

*be satisfied that the proposed Archimedian Screw pump(s) has the capacity to accept additional volumes from these sources, as well as the New Monks Farm and Ikea developments, which during periods of prolonged rainfall could be abundant. Ultimately this water will discharge into the River Adur via the pumps.*

### **Advice to the Applicant**

#### *Dewatering activities from excavations*

*We note that this proposal may involve temporary discharges of uncontaminated water from excavations to surface water. This activity may require an environmental permit(s) from us. We have a Regulatory Position Statement on this activity and the Applicant should refer to this for further guidance –*

*<https://www.gov.uk/government/publications/temporary-dewatering-from-excavations-to-surface-water/temporary-dewatering-from-excavations-to-surface-water>.”*

**Highways England** comment that,

*“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.*

*Having reviewed the Transport Assessment and transport modelling work contained therein, we are satisfied that the principle of providing a fourth arm to the approved New Monks Farm signalised roundabout on the A27 trunk road is acceptable and will not be detrimental to the efficient operation of the Strategic Road Network. However, before we are able to provide you with our final substantive response with regard to this proposal there are a number of design matters which need to be resolved as follows:*

- *Having accepted the modelling and in principle layout of the 4th arm to the junction we now require a Stage 1 Road Safety Audit. The applicants consultants have provided Highways England with the relevant details and we will contact them directly to initiate this process. Once the Road Safety Audit process is completed along with any necessary design changes we will provide both authorities with complete details for your records. At this point I consider that this process is unlikely to be closed out until late January / early February 2021.*

- *Highways England, prior to making final comment, will need to consider the implications of West Sussex County Council's response as Local Highway Authority as this is likely to have an impact in relation to the safe and efficient operation of the A27 Trunk Road. For example, WSCC have already undertaken a Stage1 Road Safety Audit on the link road proposals as these will become adopted Local Highway. The RSA report at Problem 2.6 identifies a road safety issue relating to the potential headlight dazzle at night between west bound vehicles on the link road and east bound vehicles on the A27. Highways England agree with this concern and the Auditors recommendation was to provide anti dazzle fencing. Normally Highways England would not look to adopt such a feature as a result of 3rd Party Works although in this instance the safety concern is of such a nature that it is our opinion that screening between the two carriageways is absolutely essential. Accordingly, an agreement between the Highway Authorities will need to be sought. The applicants supplied master plan shows no screening between the two carriageways and therefore this matter requires their urgent attention (prior to Highways England agreeing to commence its Stage 1 Road Safety Audit).*
- *Due to the close physical proximity (less than 7m) between the eastbound carriageway and proposed link road a vehicular road restrain system will be required to prevent errant vehicles on either road entering opposing carriageways. There is a zig zag line shown on consultants Vectos plan ref no. VN 201557/PL – 03 Rev F in the location where we would normally expect a VRS system to be placed but without a key note on the drawing we cannot be sure this is the case. Can the applicants consultants please confirm that our assumption is correct and place a note on the relevant drawing prior to submission for Stage 1 Road Safety Audit?*
- *It is essential that the operation of the 4th Arm proposals for the agreed New Monks Farm roundabout does not compromise overall efficient and safe operation of the junction as modelled. In this regard the proposals within the link road will need to ensure that there is no possibility, however unlikely, that there will be any queuing back into the roundabout from any feature proposed in the link road. In this respect we would recommend that the priority of the first road narrowing in the link road from the roundabout is reversed such that traffic movement into the village is not impeded. If traffic speeds are of concern the narrowing could be supplemented with a single speed cushion to reduce vehicle speeds travelling through it.*
- *The angle of the link road radii immediately into the proposed fourth arm of the roundabout appears to be quite severe and concern arises if there is insufficient carriageway through this section of the link road to allow for the safe manoeuvring of all vehicles reasonably expected to use this arm of the junction. Accordingly, the applicants consultants are requested to provide tracked swept path analysis of vehicles entering and leaving the fourth arm to and from the link road. There should be measures to prevent vehicles cutting the corner of the radii as this will*

*place them in direct conflict with opposing traffic. For the purposes of the analysis we consider that the extra long HGV, as recently approved by Government, should be used as this requires the most onerous swept path. This will form information that will need to be considered by the Auditors at Stage 1 Road Safety Audit.*

*We therefore ask that the proposals are amended and the additional information provided as advised above. Until such time as we have received and reviewed a revised arrangement, we request that both council's refrain from determining the planning application (other than a refusal) as we cannot be satisfied that the development will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT Circular 02/2013, particularly paragraphs 9 & 10, and MHCLG NPPF particularly paragraph 109). This additional information will allow us to provide a formal response to the planning application in accordance with the Town and Country Planning (Development Affecting Trunk Roads) Direction 2018.*

*Please note that this email does not constitute a formal recommendation from Highways England. We will provide a formal recommendation later when we can be confident that the application is in its final form. In the event that the council wishes to permit the application before this point, we would ask the council to inform us so that we can provide substantive responses based on the position as known at that time."*

**Highways England (Further comments)**

*"Referring to the planning application referenced above, validated on 16 November 2020, in the vicinity of the A27 at Coombes Road, Lancing 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);*

**Annex A – Highways England recommended Planning Conditions**

*Having assessed application AWDN/1906/20, Highways England recommends that the following conditions be attached to any planning permission granted:*

**Conditions**

- 1. The development hereby permitted (4th Arm of the New Monks Farm Roundabout) shall be constructed in accordance with the scheme of works shown on the Vectos drawing No. VN201557/PL-03 Rev J 'Proposed A27 Old Shoreham Road Improvements Development Access & Sussex Pad via Lancing College' (or other such scheme of works as approved by the Local Planning Authority who shall consult Highways England).*

**Reason:** *To ensure that the A27 Trunk Road 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 and to satisfy the reasonable requirements of road safety.*



**Informative:** The scheme shall include such assessment, drawings and mitigation as is necessary to comply with the requirements and standards set out in the Design Manual for Roads and Bridges.

2. The development hereby permitted (4th Arm of the New Monks Farm Roundabout) as shown on the Vectos drawing No. VN201557/PL-03 Rev J 'Proposed A27 Old Shoreham Road Improvements Development Access & Sussex Pad via Lancing College' (or other such scheme of works as approved by the Local Planning Authority who shall consult Highways England) shall not be brought into use until the Coombes Road junction with the A27 is stopped up to traffic, save for the passage and re-passage of pedestrians, cyclists and horse riders (permitted non-motorised road users).

**Reason:** To ensure that the A27 Trunk Road 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 and to satisfy the reasonable requirements of road safety.

**Informative:** The scheme shall include the closure of Coombes Road to and from the A27 Trunk Road to avoid unnecessary weaving and hence vehicular conflict between the immediately adjacent Trunk Road junctions.

**Pre-Commencement Condition: Landscaping between the A27 & 4th Arm of Roundabout - A27 Facing Boundary**

3. No works shall commence on the site hereby permitted (including site clearance or preparation) until the details of the hard and soft landscaping on the A27 facing side of the site have been submitted to and approved in writing by the local planning authority (who shall consult with Highways England). Thereafter the construction and use of the development shall be in strict accordance with the approved scheme unless otherwise agreed in writing by the local planning authority (who shall consult Highways England).

**Reason:** To ensure that the A27 Trunk Road 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 and to satisfy the reasonable requirements of road safety.

**Informative:** The scheme shall include such assessment, drawings and mitigation as is necessary to comply with the requirements and standards set out in the Design Manual for Roads and Bridges.

**Pre-Commencement Condition: Construction Management Plan**

4. No part of the development hereby permitted (including site preparation or clearance) shall commence until a Construction Management Plan has been submitted to and approved in writing by the local planning authority (who shall

*consult Highways England).*

**Reason:** *To ensure that the A27 Trunk Road 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.*

**Informative:** *The scheme shall include such assessment, drawings and mitigation as is necessary to comply with the requirements and standards set out in the Design Manual for Roads and Bridges.*

**Informative applying to Conditions 1, 2, 3 and 4**

*This development involves work to the public highway (strategic road network and local road network) that can only be undertaken within the scope of a legal Agreement or Agreements between the applicant and Highways England (as the strategic highway company appointed by the Secretary of State for Transport) and, as necessary and appropriate, the Local Highway Authority. Planning permission in itself does not permit these works.*

*It is the applicant's responsibility to ensure that before commencement of any works to the public highway, any necessary Agreements under the Highways Act 1980 are also obtained (and at no cost to Highways England). Works to the highway will normally require an agreement or agreements, under Section 278 of the Highways Act, with Highways England and the Local Highway Authority. Advice on this matter can be obtained from the Spatial Planning Team, Highways England, Bridge House, Walnut Tree Close, Guildford, Surrey, GU1 4LZ. Email [planningse@highwaysengland.co.uk](mailto:planningse@highwaysengland.co.uk) Tel 0300 123 5000.*

*It is understood that these works may be delivered as an adjunct to others agreed to form the 3-arm roundabout to serve the New Monks Farm development. It will therefore, either be necessary to amend any current S278 agreement or to agree a bespoke S278.*

**Pre-Commencement Condition: Street Lighting**

5. *No part of the development hereby permitted shall be brought into use until a lighting framework has been submitted to and approved in writing by the local planning authority (who shall consult with Highways England). The lighting framework shall include details of the impact of lighting on driver safety on the A27. The development shall thereafter be undertaken in accordance with the approved details unless otherwise approved in writing by the local planning authority.*

**Reason:** *to ensure that any proposed lighting will not have an adverse impact on driver safety on the A27 Trunk Road and that the A27 Trunk Road 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 and to satisfy the reasonable requirements of road safety.*

**Informative:** *The scheme shall include such assessment, drawings and mitigation as is necessary to comply with the requirements and standards set out in the Design Manual for Roads and Bridges.”*

**West Sussex County Council - Highways** comment that,

*‘The application is for the construction of a form arm at the approved New Monks Farm A27 to Coombes Road and the closure of the existing A27 junction with Coombes Road.*

*A new three armed roundabout junction on the A27 was approved as part of planning application ref AWDM/0961/17 which would provide access to 600, dwellings and retail floor space for an Ikea store, as well as providing access to the existing usages at and around Shoreham Airport including those permitted under AWDM/1093/17.*

*Under the above proposals the existing signals would be removed and the right hand turn out of Coombes Road banned, vehicles would be required to travel to the Hangleton junction to perform a U if wishing to travel westbound, traffic from the west seeking to access Coombes road would be required to perform a U turn at the new development access roundabout.*

*Proposals - A 330m long and 5.5m-6m wide highway link would be constructed between the approved roundabout and Coombes Road. A 3m wide shared use facility would be provided along the northern side of the carriageway for half of the road's length before reducing to a 2m footway with cyclists rejoining the carriageway.*

*Junction Modelling - The impact of the 4th arm has been modelled utilising LinSig and details the 4th arm would not have a severe impact on the highway network with all arms of the junction remaining within capacity. The impact of the reassigned flows shows additional vehicles would travel past the nursery and residential properties and reduce north of*

*The Drive - Design The provision of traffic calming or indeed the 20mph speed limit would not be a requirement of WSCC. Justification should be provided for the inclusion of both elements within the scheme design.*

*It is noted that the Highways England response requires confirmation that a vehicle restraint is provided between the access road and A27. It is noted that appropriate forward visibility is available at each of the build outs, however this (especially for the eastern most buildout) should be shown on a plan. Visibility splays should also be shown for the revised nursery access.*

*It is also recommended that consultation takes place with residents, emergency*

*services and existing users of Coombes Lane over the traffic management elements of the scheme.*

*Speed limit - The first 75m from the A27 would have a 30mph speed limit and a 20mph speed limit is proposed for the rest of the link, the scheme includes measures such as gateway features, speed cushions, kerbed build outs and slow markings with a feature approximately every 80 meters.*

*As identified above the 20mph speed limit would not be a requirement of the highway authority and consultation should take place with local stakeholders to identify the appropriateness of traffic calming that would be required to self-enforce the proposed speed limit.*

*Lighting - Problem 2.2 of the Stage 1 RSA identifies the lack of street lighting and recommends Street lighting should be provided for the scheme, particularly for critical areas such as at traffic calming features and junctions. The application notes in 2.3.25 that not all of the traffic calming features would require lighting, given the dark sky status it would be beneficial to set out which features would require lighting and indicate likely levels.*

*Pedestrian Connectivity - No pedestrian (or cyclist) facilities are proposed between The Drive and the NMU route alongside the Adur that joins Coombes Road. No indication of how the existing footpath alongside the A27 would be integrated or alternative provision provided.*

*Cyclist Connectivity - Justification should be provided for not continuing with a 3m shared use facility which would replicate all the other facilities provided within the local area being provided as part of the New Monks Farm application.*

*The build outs provide a combination of cycle bypasses and utilising the running lane, a standardised approach should be explored.*

*Horse Riders - No details concerning the appropriateness of the route for equestrians has been provided and how they may travel towards the new A27 junction.*

*Safety Audit - A stage 1 Road safety audit has been undertaken and highlights 6 issues.*

*The designers response should be provided to WSCC in a word document format to allow highway authority commentary to be provided. It is noted from the Highways England response a collaborative approach is required to address the auditor's recommendations including measures to reduce dazzling.*

## Conclusion

*Additional information is required*

- *Justification for the traffic calming and 20 mph speed limit;*
- *Evidence of consultation;*
- *Forward visibility at priority workings and visibility splays for revised accesses;*
- *Details of proposed street lighting;*
- *Details of NMU connectivity adjacent to the A27 between existing Coombes Road and new link.*
- *Further consideration of cycle links and consideration of equestrian use;*
- *Designers Response in word format.”*

## **West Sussex County Council - Highways (Further Comments),**

*“In order to address the request for further information .... the applicant has provided a technical note ref - Proposed 4th Arm and Local Highway Link – Note 02 and a revised highway plan ref Drawing No. VN201557\_PL03 Revision H.*

*Speed limit and Traffic Calming - The applicant has amended the scheme to provide a 30mph speed limit and removed several of the traffic calming features.*

*The TN indicates the scheme has 4 character areas.*

*1, Close to A27, The section to be controlled by HE, including centre line markings, advance signage, lighting and off carriageway foot/cycle links.*

*2, Main highway link, Gateway feature with cyclists re-joining the carriageway and removal of the centre line.*

*3, In front of buildings, Centre line removed, reduced carriageway width and alternative footway coloured*

*4, The Drive northwards, gateway feature to be provided, existing carriageway to be reprioritised and keep existing characteristics – e.g no lighting, footway.*

*The features proposed and the amendment of the proposed speed limit would remove the requirements for further consultation with local residents/emergency services etc over that already undertaken, details of the proposed lighting and forward visibility at priority workings.*

## **Non Motorised User connectivity**

*The applicant has provided further information and diagrams to detail how the provision of infrastructure compares to that of the consented scheme and that proposed within the application. The proposals indicate a reduction in peak and off-peak vehicle flows north of the drive where no pedestrian provision is proposed.*

*The TN indicates that cyclists would rejoin the carriageway at the western build out travelling eastbound. Heading westbound cyclists would be required to cross the carriageway and as agreed within the Road Safety Audit designers response additional directional signage should be provided to indicate the off road route. The option of*

*providing cycle bypasses at the gateway feature at the western end of the scheme and at the carriageway narrowing is also included and could be secured at detailed design if required.*

*The TN also highlights that the reduction in vehicle flows north of the drive would aid access to PRoW 2065 for equestrians however no new dedicated facilities would be provided along the link.*

### **Safety Audit**

*A stage 1 RSA and designers response has been provided and agreed with WSCC Highways. The audit highlights 6 issue of which the design organisation agrees with 4 (review of parking at detailed design/ screening of see through locations/ anti dazzle measures and reflective bollards) Two issues raised by the auditor were not agreed with (provide off road cycle route the length of the scheme and provide full street lighting) and as such an exception report has been considered and agreed with additional signage to highlight cycle routes and the use of reflective bollards/removing traffic management measures removing the need for street lighting.*

### **Conclusion**

*No objection is raised to the application subject to the following conditions:*

- 1. Approved Plans;*
- 2. The use of the 4th arm shall not come into use until Coombes Road / A27 is closed;*
- 3. A phasing plan of works to be provided and information on how they will be programmed to maintain NMU access.*

#### *4. Construction Management Plan*

*No development shall take place, including any works of demolition, until a Construction Management Plan 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. The Plan shall provide details as appropriate but not necessarily be restricted to the following matters,*

- 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 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.*

*Reason: In the interests of highway safety and the amenities of the area.*

## **INFORMATIVES**

*Works within the Highway – Implementation Team. The applicant is required to obtain all appropriate consents from West Sussex County Council, as Highway Authority, to cover the off-site highway works. The applicant is requested to contact The Implementation Team Leader (01243 642105) to commence this process. The applicant is advised that it is an offence to undertake any works within the highway prior to the agreement being in place.”*

## **Representations**

**The Sussex Countryside Charity (CPRE Sussex)** comment that,

*“This is the formal response of CPRE Sussex – the Sussex Countryside Charity - to the above application. CPRE Sussex works to promote the beauty, tranquillity and diversity of the Sussex countryside by encouraging the sustainable use of land and other natural resources in town and country.*

## **The Proposal**

*As part of the approved New Monks Farm development, a roundabout is to be introduced to the A27 west of the former Sussex Pad and the route of the current A27 will be moved slightly south. The approved design requires the removal of the signalised junction at the former Sussex Pad such that users of the Coombes Road access will only be able to turn left into it and left out of it. This road accesses Lancing College and a number of dwellings.*

*The proposal is to add a fourth arm to the approved roundabout and a new road linking to Coombes Road to enable Lancing College and the dwellings accessed from Coombes Road to travel west without taking a long diversion around the Shoreham flyover or enter Coombes Road from the east without having to divert via the next roundabout to the west. An additional footpath/cycle connection is also proposed to the approved Non Motorised User (NMU) route.*

*Three options are explored in the applicant’s Landscape Design and Access Statement, two similar proposals which follow the line of the A27 (A and C) and one which goes at right angles to the A27 up the slope to join the bridleway to the west of The Drive. Option B was dismissed primarily due to its landscape impact on the National Park. Option A takes a longer route to join with Coombes Road close to its current junction with the A27. Option C is similar to Option A but joins onto Coombes Road West adjacent to the former Sussex Pad (now used as a nursery school for Lancing College). It is Option C which is broadly proposed in the current applications, although the application proposal also includes the removal of the previously retained left-in/left-out junction on the A27 with all Coombes Road traffic directed to use the A27 roundabout.*

*The design would require the removal of some trees and vegetation currently growing along the verge and bank. These include several groups of Sycamore and Ash trees and some Hawthorn, Dogwood, Common Yew, and Field Maple. The condition of most of these trees is described as 'fair' or 'good' in the tree survey. Part of a hedgerow would also need to be removed. Areas of new woodland planting are proposed both along the northern edge of the existing vegetated bank and between the south of the new highway and realigned A27. The verges will be sown with a suitable wildflower mix, with a wetland mix to be used within the proposed swale. The area where Coombes Road (East) forms a junction with the A27 will be scrubbed up and planted with trees and shrubs. The applicant states that there would be a loss of approximately 2128 m<sup>2</sup> of woodland and scrub habitat along with individual trees, with the planting of approximately 2522 m<sup>2</sup> of woodland and scrub planting, as well as new wildflower grassland.*

*As part of the drainage strategy a swale and additional water storage tanks would be introduced between the proposed road and the A27. The swale will be designed to accommodate a 1 in 100 year flooding event with a 40% allowance made for climate change.*

### **Relevant Planning Policies**

*The application site is in two Local Planning Authority areas - Adur District Council and the South Downs National Park Authority - and there are therefore two separate but identical applications to each authority. The Development Plan comprises the Adur Local Plan (2017) and the South Downs National Park Local Plan (2019). However, the development and the affected properties are mainly within the National Park and the following policies are considered to be the most relevant to this proposal;*

- *Strategic Policy SD4: Landscape Character – which says that development proposals will only be permitted where they conserve and enhance landscape character.*
- *Strategic Policy SD9: Biodiversity and Geodiversity – which says that development proposals will be permitted where they conserve and enhance biodiversity and geodiversity and identify and incorporate opportunities for net gains in biodiversity.*
- *Development Management Policy SD11: Trees, Woodland and Hedgerows – which says that development proposals will be permitted where they conserve and enhance trees, hedgerows and woodlands.*
- *Strategic Policy SD20: Walking, Cycling and Equestrian Routes – which says that development proposals will be permitted provided they contribute to a network of attractive and functional non-motorised travel routes, with appropriate signage, throughout the National Park.*



- *Strategic Policy SD49: Flood Risk Management - which seeks to reduce the impact and extent of all types of flooding.*
- *Development Management Policy SD54: Pollution and Air Quality – which says that development proposals will be permitted provided that levels of air, noise, vibration, light, water, odour or other pollutants do not have a significant negative effect on people and the natural environment now or in the foreseeable future, taking into account cumulative impacts and any mitigation.*

### **Main Issues**

*In their pre-application advice the South Downs National Park Authority officers made it clear that they had significant concerns regarding the need for the fourth arm of the roundabout as neither Highways England nor West Sussex has specifically requested it to be provided, and that they would need to be convinced that there is a clear, overarching requirement for the fourth arm that would bring multiple benefits through its development. It would need to be clearly demonstrated that the proposal could be delivered without causing harm to landscape character, or to views to and from the National Park.*

*Whilst Lancing College has submitted evidence about the challenging circumstances they are in as a business, their lengthy report does not include any empirical evidence that their business will suffer further from the access arrangements approved under the Monks Farm development. Undoubtedly the arrangement will be less convenient to users of Coombe Road than the existing signalised junction, but loss of convenience does not equate to evidence that there will be a significant impact on the business or residents.*

*To be weighed against this is the harm that would be caused to the landscape character of the National Park through the removal of extensive areas of healthy trees and vegetation, and the reprofiling of the land to create the new road. From on-site inspection this would appear to be much greater than even shown in the proposed plans. Whilst new planting is proposed this will take many years to replace the visual and biodiversity value of the existing vegetation and to compensate for the loss of its carbon sequestration role.*

*Also of concern is the impact of the new road on the residents of Coombes Road West, who will experience far greater levels of noise and disturbance from traffic than at present due to its increased proximity. Coombes Road is a through route to Steyning and, provided with easy access to the A27 and IKEA via the proposed new fourth arm of the roundabout, could easily become a rat-run for those trying to avoid congestion on the A27. This would also be harmful to cyclists, equestrians and walkers who are regular users of Coombes Road.*

*Finally, the area proposed for the new road is within flood zone 3, and there are also*

areas at risk from surface water flooding. Adur District Council's drainage engineer has asked for the proposed discharge rate to be reduced to be compliant with policy and minimum achievable restrictions.

## **Conclusion**

In conclusion **CPRE Sussex** objects to this proposed development on the following grounds:

- The proposed development is not justified because there is no highways safety reason for the proposal and WSCC and the Highways Agency were satisfied with the access arrangements agreed under the Monks Farm development. The proposed development will cause harm to the landscape character and biodiversity of the National Park by removing healthy trees and vegetation and disturbing soils. Whilst new planting is proposed it will take many years to replace the visual and biodiversity value of the existing vegetation and to compensate for the loss of its carbon sequestration role contrary to Strategic Policy SD4: Landscape Character, Strategic Policy SD9: Biodiversity and Geodiversity and Development Management Policy SD11.
- The proposed development will enable easier access to the A27 / IKEA from Coombes Road which is likely to significantly increase the levels of traffic using Coombes Road as a rat-run from Steyning to avoid the congestion on the A27. This will be detrimental to the rural character of Coombes Lane, the amenities of residents of Coombes Road West and the amenities of pedestrians, equestrians and cyclists using this route contrary to Development Management Policy SD54: Pollution and Air Quality and Strategic Policy SD20: Walking, Cycling and Equestrian Routes.
- The proposed drainage arrangements are inadequate and would result in increased flood risk contrary to Strategic Policy SD49: Flood Risk Management."

**West Sussex Local Access Forum (WSLAF)** comments that,

"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](http://www.wslaf.org).

WSLAF's considered view from a non-motorised user (NMU) perspective, is that the infrastructure improvements necessary for the whole development offered the best

*opportunity to deliver a grade separated (bridge) crossing of the A27 to replace the signalised Old Shoreham Road/Coombes Lane junction crossing at this location. This still remains the view of many Members, in order to secure complete safety and protection for all NMUs (walkers, cyclists, equestrians, and disabled), although we accept this has significant cost implications.*

*We believe it is important when considering this 4th Arm application that the proposed works do provide protection and connectivity for all NMUs. The Transport Assessment does indeed address this, but only refers to walkers and cyclists, without any mention of equestrian use, an omission highlighted in the response from WSCC Highways (No details concerning the appropriateness of the route for equestrians has been provided).*

*This raises significant concerns regarding overall NMU safety when using the proposed 'fourth arm'. The road is narrow and it is acknowledged will be used by large vehicles (HGVs, farm vehicles). NMUs will inevitably be in close proximity to these vehicles and the associated noise and fumes as well as the hazard of 'close pass'. 1.5m is West Sussex Local Access Forum recommended to avoid 'close pass' and this should be incorporated in order to avoid risk and to maintain the attractiveness of the route.*

*The controlled roundabout crossing, and off-road link alongside the A27 to Coombes Road (east) are for walkers and cyclists only, so equestrians will only be using the eastern section of the new road. The proposed speed limit of 20mph from The Drive to Coombes Road will hopefully slow traffic, but equestrians and cyclists travelling to and from bridleway 2065 to Coombes Road will have to negotiate the traffic calming measures, including speed cushions and kerb build outs which will increase a feeling of vulnerability.*

*More details of the design of proposed traffic calming measures, together with more details of the realignment of the junction where the new highway meets Coombes Road are requested, both of which should show consideration of equestrians, as well as walkers and cyclists.*

*The 'desire lines' for all NMUs at this location are both north/south and east/west. Coombes Road (a narrow winding road with poor sight lines) connects to several bridleways in the South Downs National Park (SDNP) that are all well used. Coombes Road (west) connects to The Drive (to Lancing College), which is also bridleway 2065.*

*The Forum welcomes the planned delivery of the new bridleway connection from Coombes Road (east), along the north side of the A27, and the proposed upgrade of Footpath 2049, under the flyover and along the riverbank to Old Shoreham Road, to connect to the Adur bridge (a bridleway), and the Downs Link. This should provide a safe alternative route to replace the signalised Coombes Road crossing, but only if there is adequate width (WSCC standard is 3m) to accommodate all future users, including predicted additional users from the new development."*

The **British Horse Society Access & Bridleways Officer** raises a **holding objection** for more information. The Society comments that,

*'I have been involved in responding to a number of applications associated with the New Monks Farm development over many years, on behalf of local equestrians. There are approximately 100 horse riders within a five mile radius of this location.*

*Riders use Coombes Road (a narrow lane with poor sight lines), travelling both north and south, as the Road connects to several well used bridleways in the SDNP. Coombes Road West is used to connect to The Drive to Lancing College (which is bridleway 2065), or riders travel on to use the signalised crossing (although perceived to be unsafe by the less experienced), connecting Coombes Road to Old Shoreham Road leading to the Adur Bridge (which is a bridleway) and on to the Downs Link. Both provide circular routes.*

*Whilst there is no objection 'in principle' to the proposed '4th arm', there are significant concerns regarding the safety of NMUs using the new link, especially equestrians whose safety these comments particularly address.*

*The Transport Assessment refers only to walkers and cyclists using Coombes Road West, and the off-road links adjacent to the A27 east-west from the roundabout junction, there is no mention of equestrians using any part of the proposed new route.*

*However, having looked at the route options, there is no doubt the safest for horse riders would be to stay well away from the busy and noisy A27, and use the eastern section of Coombes Road West from/to bridleway 2065, negotiate the junction with Coombes Road (and whatever realignment is proposed here must protect all NMUs), then use the landscaped section of Coombes Road to connect with the new east-west bridleway on the north side of the A27.*

*However, there are concerns regarding what is thought to be a serious underestimate of the number of vehicles that may use Coombes Road West. and as mentioned in the Transport Assessment, this will include HGVs and farm traffic, as there are several farms and a business centre in Coombes Road.*

*Whilst a 20mph speed limit is welcomed, the proposed traffic calming measures,(priority buildouts, speed cushions etc), are likely to make horse riders feel vulnerable, and squeezed/trapped by passing vehicles close by (the road is narrow). Any bypass provided for cyclists must allow for use by equestrians.*

*Additional information required, is a detailed design (and map) of the 20mph traffic calming measures, and realignment proposals at the junction of Coombes Road West and Coombes Road, showing consideration of equestrians."*

**Cycling UK**, a local representative of Brighton and Hove comments that,

*I am **objecting** to SDNP/20/05236/FUL and AWDM/1906/20 on the basis that further consultation is needed as stated in West Sussex County Council's response on 16 December to Highways England's letter, that it is "recommended that consultation takes place with residents, emergency services and existing users of Coombes Lane over the traffic management elements of the scheme.*

*Members of Cycling UK are among the people who cycle in Coombes Road and in the local area, and we would like to see more consultation. Other user groups such as walking, disability, equestrian and wildlife groups would benefit from further consultation, as well as the residents.*

*The additional 4th arm proposed for the new roundabout on the A27, as well as the approved New Monks Farm development, and the closure of the Sussex Pad crossing for people cycling is a major change. Instead of the existing direct cycle crossing of the A27, a variety of indirect and incoherent arrangements are either already approved, unfortunately, or are being proposed. We note that Lancing Parish Council say that "not enough consideration had been given to cyclists and pedestrians."*

*The National Planning Policy Framework states that applications for development should "give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas". That has not been demonstrated in the previous approved New Monks Farm application, nor this current one. Despite checking the documents as well as possible, questions remain.*

*Correspondence between WSCC and Highways England has highlighted important gaps in cycling and walking connectivity:*

- *No cycling or walking facilities between The Drive and the cycling/walking route along the Adur that joins Coombes Road.*
- *No indication of how the existing footpath along the A27 would be integrated or alternative provision provided.*
- *No description of cycling or walking links adjacent to the A27 between existing Coombes Road and the new road.*
- *Lack of coherence in the design of cycling facilities.*
- *Measures needed to prevent motor vehicle headlights dazzling people walking or cycling.*
- *Whether lighting will be provided (or permitted) to ensure that vul users are visible in the vicinity of traffic, given that the South Downs National Park is designated as an International Dark Sky Reserve, particularly as the developers state that "The majority of lighting will be restricted to the first section of the road, closest to the roundabout."*
- *The influence of design on the speed of traffic.*

*Highways England's CD 195 'Designing for cycle traffic' design criteria include:*

*Coherence: Cycle networks link trip origins and destinations, including public transport access points and are continuous and easy to navigate.*

*Directness: Cycle networks serve all the main destinations and seek to offer an advantage in terms of distance and journey time.*

*Comfort: Infrastructure meets design standards for alignment and surface quality, and caters for all types of user, including children and disabled people.*

*Attractiveness: Aesthetics, noise reduction and integration with surrounding areas are important.*

*Safety: Cycle networks not only improve cyclists' and other road users' safety, but also their feeling of how safe the environment is (their personal security).*

*It would greatly assist the consultation if a complete, clear map of cycling and walking connections and remaining gaps were produced, showing what is shared use, and providing all the relevant details of width, surface, lighting, whether the facility is one-way or two-way, the gradient, crossing times, speed of traffic etc.*

*We would like to see a fuller explanation of traffic management and the measures to ensure safe passage of vulnerable road users, including signage, more detail on the physical infrastructure and expected vehicle speeds. Motor vehicles will travel greater than 50 mph on the A27 and drivers need to reduce their speed rapidly to reduce the danger they pose to vulnerable road users using paths and pavements, cycling/walking in groups, with children or alone.*

*Although it is stated that a "continuous NMU route is proposed along the northern side of the new highway link" this appears to be eastbound only, and there is only an initial 3 metre shared walking/cycle path which then becomes a 2 metre pavement after 140 metres. If someone were to take a child to the nursery coming eastbound along this route, using a cargo bike for example, what is their expected return route?*

*Government guidance, the Cycling and walking plan for England (Gear Change) says "Cycle routes must flow, feeling direct and logical." We are concerned that the 4th arm will adversely affect people attempting to cycle north-south using the discontinuous and inadequate route of crossings over the A27 via the new roundabout, and people cycling west-east along the northern side of the A27.*

*We note that the developers say that "not all of the traffic calming features (i.e. cushions) need to be illuminated." We have read that "The entrance into the 20mph area is further highlighted by the inclusion of a gateway feature to both the southern and northern approach" and we would like to know what the gateways consist of and how visible these and any other constructions in the road will be.*

*The conversion of The Drive, currently a quiet cul-de-sac into a new road link to a new roundabout will increase traffic and reduce air quality. Government policy on decarbonisation, Active Travel and the need for greater space for walking and cycling*

*due to the Covid-19 pandemic need to have far greater priority in planning decisions.*

*Beyond the buildout in the eastbound carriageway towards Little Lancing, people cycling would need to join the carriageway and share the route with motor vehicles, some of which will be dropping children off at the nursery and then seeking to manoeuvre to return westbound down the 4th arm, as we understand it. We are concerned that this is likely to cause a hazard to riders. We also note that the carriageway becomes narrowed due to another buildout in the westbound carriageway. This forces cyclists to ride in what is effectively a single carriageway with two-way traffic.*

*We would like to know which authority will be responsible for maintaining the paths, cycleways and pavements and what programme of maintenance is proposed to control vegetation and ice, snow, flood, grit, road debris etc. Coombes Road forms a key cycling route from Shoreham to the West Sussex villages and to Steyning. It will be a great loss, and also very dangerous indeed if traffic starts using it beyond current levels. It is a narrow single carriageway lane without pavements. A proportion of drivers already go too fast. A lower speed limit is needed.*

*If the new link is built, we are not assured that measures will be adequate to stop drivers using Coombes Road as an alternative to major road routes, and fear that there will be an inevitable increase in traffic, and that the measures supposed to stop extra traffic or certain traffic movements will prove to be inadequate.*

**Lancing Parish Council** objects to the Planning Application on the grounds of :

- “- Design*
- Other*
- Trees and Landscaping*

*The Planning Committee agreed that the application be recommended for refusal on the grounds of flood risk, including the proposed drainage not deemed to be adequate. Traffic congestion and pollution concerns were raised in addition to undesirable environmental impacts. It was also felt that not enough consideration had been given to cyclists and pedestrians.”*

**The Badger Trust - Sussex** has some concerns regarding the welfare provision for the Eurasian Badger. It states that,

*“Firstly, the environment impact report states that a badger walkover assessment was effected in early February 2020. The badger like many indigenous mammals is in a semi torpid state at this time of year and accordingly evidence or marks are often not visible. There are listed sett groupings close by to the North West, South West and North. Therefore the route of this new road is likely to be frequented by badgers; accordingly it is considered essential that a current detailed badger survey is undertaken before this application is progressed further. Badger Trust – Sussex is*

*willing to assist with this if required.*

*Secondly, we consider it unfortunate that the path for this new road cuts through a wooded green area on the fringe of the National Park which is a precious habitat for many mammals including the badger. This is the fifth anniversary of the Paris Climate Agreement and the degradation of wildlife habitat is certainly also involved in climate change and the associated deadly air pollution affecting all life.*

*The Eurasian Badger and its sett are strictly protected by the 1992 Badger Protection Act. Dependent habitat is covered under Schedule 6 of the 1981 Wildlife and Countryside Act.”*

## **Representations**

12 objections have been received from local residents and businesses currently served from Coombes Road. The objections raise the following points,

- i. The development is unacceptable on the basis of the impact on wildlife and visitors to the area, traffic levels, pollution and noise.
- ii. Assurances have been given that traffic levels using Coombes Road were monitored at peak times, however, we understand that this was undertaken in January which would not have captured the increased levels of traffic that the Spring - Autumn period brings when visitors to the National Park to caravans travelling to the camping site and increased farm traffic, including the movement of livestock.
- iii. All of the properties at the end of the current cul-de-sac will be adversely affected by a lack of visitor parking as the Fourth Arm proposed eliminates the current on-road parking outside of these homes.
- iv. Old Farm Cottage will be particularly adversely affected as the gated driveway has a limited view of oncoming traffic which will be problematic in increased levels of two-way traffic and creates a potential hazard. Both the Old Farm Cottage and Honeymans Cottage have manual gates that open outwards onto the road. After pulling out vehicles need to be parked on the road so that the gates can be closed. Lancing College has agreed to look at some provision for our visitors, probably at weekends, in the Little Lancing Nursery car park and have also indicated that a residents' bay outside of the Old Farm Cottage may be possible. However, neither of these are guaranteed as they will not form part of the submission's plans and neither provides a comparable position to that which is currently enjoyed.
- v. Properties at the end of the existing cul-de-sac are very old and there is concern that increased vibration levels may affect the foundations of these dwellings.



- vi. The cesspit for Newman's Cottage is located in the field opposite our properties. A shared cesspit for Pad Farm House and the Old Farm Cottage is soon to be relocated into the same field. As the proposal recommends a narrowing of the road outside our property as part of the traffic calming measures, we are concerned this will cause difficulties when the cesspit requires emptying due to the size of the vehicles required.
- vii. It seems illogical to require traffic heading in the Brighton direction to drive the extra mileage to exit via the Fourth Arm roundabout in order to prevent westbound traffic having to navigate the Shoreham roundabout. It is difficult to understand how the Fourth Arm proposal is more beneficial to traffic flow and it also brings additional negative aspects that the currently agreed proposal does not.
- viii. It is noted that from the list of those supporting the application that several of these are employees (or their relatives) of Lancing College, many of whom live on the Lancing College Estate and are not local residents who are independent of the school. Nor, due to the location of properties, will they experience any increased volume of traffic passing their homes.
- ix. It is hard to see how traffic is going to navigate a roundabout at peak times given the A27 is a main east west artery. There is also the fact that Lancing College generates traffic at peak school run times.
- x. Traffic currently exiting Coombes Road enjoys regulated slots via the traffic lights and without the lights, it would then be hit and miss. Drivers will become frustrated and this will lead to taking a chance and so raising the risks of accidents.
- xi. Retaining the existing traffic lights is a better option and it is suggested that this should be an urgent re-evaluation of the evidence presented to determine the best solution for this junction.
- xii. The proposal would be an unnecessary expense and would have a negative impact both on the residents and the wildlife environment.
- xiii. A safer solution for pedestrians would be to upgrade the current footpath along the river and Ricardos to a bridleway with access from the river on the north side under the flyover to adjoin the end of Coombes Road.
- xiv. There seems to be little consideration of the regular and extreme flooding events that take place on the site. These occur almost annually and are bound to be exacerbated by this and associated developments.
- xv. The re-routing of the road in close proximity to houses adjacent to the Sussex

Pad seems dangerous for users of the nursery and other properties. There seems no adequate provision for horses and riders or indeed for cyclists who, in large numbers, mainly cross the A27 at this point.

- xvi. The tree removal plan does not appear to adequately or accurately describe the works involved. Far more tree scrub removal will be required, especially to the area close to the Pad to facilitate the new Fourth Arm road.
- xvii. The whole New Monks Farm development and the associated works in this scheme seem to want to ignore the reality of rising sea levels.
- xviii. The developers have provided mis-information in the Design and Access Statement. It is suggested that the new route and the overall design responses will mean that noise and air quality impacts have been appraised to be negligible to no change compared with current situation. As residents of Coombes Road West for an excess of 20 years to read negligible to no change is totally misleading and disrespectful to the few residents that live along this section of the road. The actual current situation is that a minimal amount of traffic uses Coombes Road West and it is used by visitors parking to access the South Downs and it is frequented by residents and their visitors, deliveries, students, parents, staff , ramblers, cyclists, horses, runners and tourists. It is not currently subject to large HGV or farm type vehicles nor the amount of vehicular traffic this proposal will bring as it is not currently a through road. This will be a radical change.
- xix. The proposals highlight an existing pinch point situated between Honeyman's Cottage and the Old Farm Cottage and to overcome this issue it is planned to propose a give way point between the driveways. Based on these proposals you could potentially inadvertently turn out of these properties causing an issue through this pinch point.
- xx. The development will have an impact on property values and with Old Farm Cottage only 1 metre away from the current quiet road, increasing this to 2 metres is not going to mask the increase in noise levels or emissions from the extra traffic.
- xxi. The new road is likely to cause privacy issues when large HGVs and double decker bus coaches pass so close to these properties.
- xxii. HGVs are vital to many businesses along Coombes Road and these are not going to get any smaller so it is important that the scheme is future proof and the road is wide enough for this purpose. It is also important that the sequencing of any traffic lights allow good traffic flow in and out of Coombes Road and avoids the current traffic congestion which regularly occurs. The new road will impact on adjoining properties through construction impacts and when open will substantially increase vehicle emissions, queuing traffic, sleep and

lighting disturbance, increased road noise and associated vibration, especially for the heavier HG vehicles.

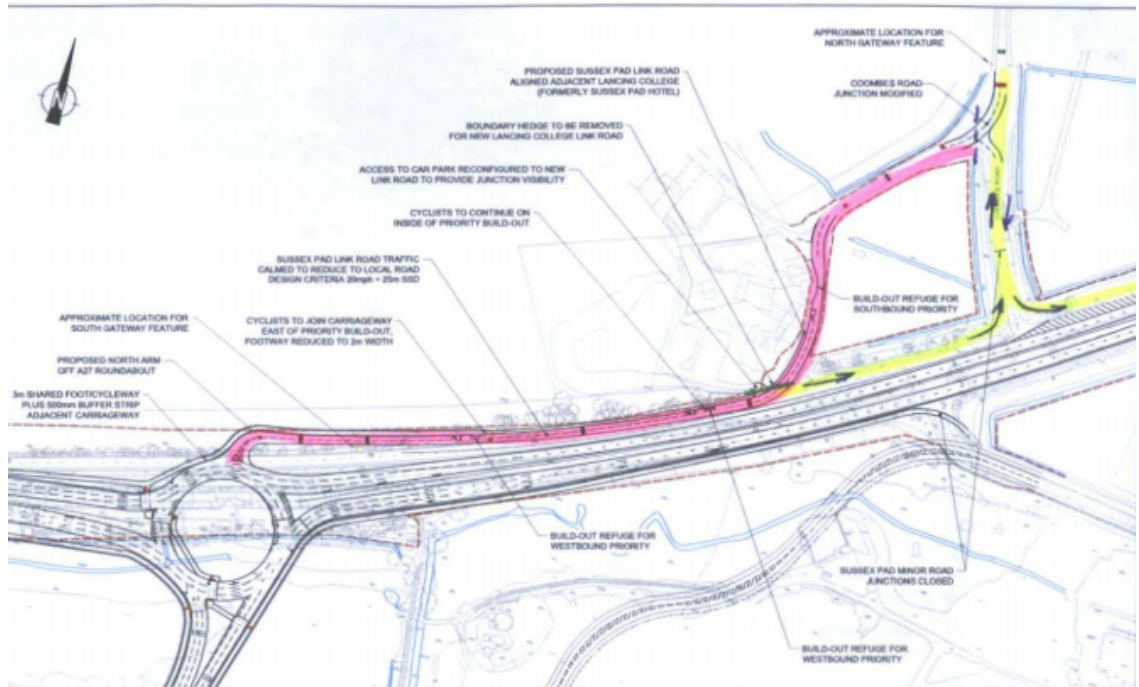
- xxiii. It is not considered that the proposed access through Coombes Road West is suitable or a better solution for all concerned. The existing current arrangement lends itself to separating College visitors from disrupting general traffic from Coombes Road East and is, therefore, beneficial. Coombes Road East is also already substantially wider than Coombes Road West and using this existing entrance would not impact residential properties either. The 20mph speed restriction could then still be enforced around Lancing College grounds and not unnecessarily affect the general Coombes traffic.
- xxiv. Whilst it is hoped that permission is not granted, if permission is given then it is considered that it would be better if the Fourth Arm were a one-way westbound road rather than a two-way road. The existing A27 Coombes Road junction could then be retained as the entrance point for all traffic and as the exit point for eastbound traffic. This would benefit everyone with the desired solution for westbound traffic exiting Coombes Road without the need to travel round the Shoreham roundabout. It allows eastbound traffic to exist via the existing A27 Coombes Road junction without the need to travel to the Ikea roundabout along the Fourth Arm and then double back eastbound along the A27.
- xxv. It seems counter productive to solve the issue of westbound traffic not travelling round the Shoreham roundabout with a solution that requires eastbound traffic to travel round the Ikea roundabout. A one-way Fourth Arm would negate the increased traffic volumes pollution on the eastbound stretch of the A27 between the Ikea roundabout and the existing Coombes Road junction that the proposed Fourth Arm would generate. This would also be a more cost effective option and have less impact on wildlife habitats along the proposed Fourth Arm. A one-way road may minimise the route becoming a back way to Ikea for visitors to the store that wish to avoid the A27 and retaining the existing A27 Coombes Road junction would be more convenient for businesses and residents along both Coombes Road and Coombes Road West providing a quicker and easier access point and eastbound exit point. It would minimise the volume of traffic along Coombes Road West including from farm vehicles and caravans, as well as those accessing Lancing College. This currently quiet stretch of road is used by residents, visitors, cyclists, horse riders and wildlife so it would be beneficial to minimise the impact of traffic along the stretch. This solution could also allow access to Little Lancing Nursery with the one-way section starting just past the Nursery.
- xxvi. There are also concerns about the proposed traffic calming as it will create a pinch point, particularly during the busy school pick up / drop off times.
- xxvii. Cycling clubs and individuals who cycle have for many years used the direct crossing over the A27 to/from Shoreham, Coombes, Botolphs, Annington,

Steyning etc via Coombes Road. The closure of this direct crossing will mean that cyclists and any future cyclists will have to take one of the two substandard diversionary routes, one currently a footpath and the other a detour via several crossing points over the new roundabout with traffic fast and close. This is unacceptable.

- xxviii. The design throughout this application is not consistent with design guidance on cycling infrastructure such as DMRB (CD195 - Designing for Cycle Traffic), Local Transport Note 1/20 or Gear Change, the Cycling and Walking Plan for England. Cycle routes should be continuous, coherent, direct, attractive and safe. Cycle infrastructure should be designed for a significant number of cyclists and there is now an even greater need for wider routes due to the ongoing need for social distancing due to Covid.
- xxix. The proposal to open a new slip road is likely to bring more northbound traffic on Coombes Road. This is an added hazard for people walking and cycling on the rural lane and there are insufficient assurances that the measures proposed are adequate to prevent the use of the road by more traffic in both directions or that restrictions will not be loosened at a later date.
- xxx. It would be beneficial for all to have greater attention to conservation in the South Downs National Park instead of removing more trees and vegetation to accommodate yet more motor vehicle traffic.
- xxxi. It is not understood how the Vectus Assessment considers that restricting access to Coombes Road (with the approved left in, left out arrangement onto the A27) will not deter traffic that would otherwise turn right in/out to use the Coombes Road as an alternative to the A283 to access Steyning, Bramber and Upper Beeding.
- xxxii. Coombes Road is already subject to speeding motor traffic including delivery vans to the detriment of its road surface and its utility as a non-motorist user route.
- xxxiii. The proposal would have a negative visual impact resulting in an additional 300 metres of highway within the National Park adding to the already rather wide approved scheme and additional loss of trees and associated biodiversity. The proposal conflicts with the requirements of the Adur Local Plan (Policies 5 and 28) as it fails to provide improved access across the A27 to the South Downs National Park for pedestrians, cyclists and equestrians and it fails to comply with encouraging sustainable modes of transport and reduce the demand for the private car.

**An objection letter signed by 13 Businesses and Residents of Coombes Road and Botolphs Road has also been submitted raising the following concerns:**

- xxxiii. We have concerns with the proposed redesign of the access due to the bottleneck and congestion it will undoubtedly create, the lack of thought for other local businesses, lack of thought for commercial vehicle access and the accuracy of supporting statements.
- xxxiv. It should be noted that the farms and businesses along Coombes Road generate around two thousand commercial vehicle movements per year. These support businesses and employment alike and it is considered that the current proposal does not take into account the needs of these businesses.
- xxxv. In particular, the proposal will introduce congestion from the A27 New Monks Farm roundabout for those attempting to travel north and introduce a bottleneck for HGVs, commercial vehicles, tractors and caravans wishing to access businesses further north on Coombes Road, introduce safety issues at the junction as a result of the proximity of Little Lancing Nursery and others on foot and cyclists and fail to reduce journey times or distances as suggested by the applicant, it would not reduce the queuing issues currently suffered on the A27, it would require the removal of a significant number of trees, encourage more commercial vehicles to attempt to access Coombes Road via the northern Steyning end, create an unused area at the southern end of Coombes Road.
- xxxvi. It is suggested that a revised scheme could be designed that would provide a number of benefits to the College and other businesses served by Coombes Road. It is suggested that if a Fourth Arm were to be approved for the new roundabout, it would suggest that the current slip road providing access to the existing junction at the south end of Coombes Road be extended to meet the proposed Sussex Pad access road (Coombes Road West). In this way, Lancing College customers could use the Coombes Road West access as they seem to desire while other traffic including commercial traffic could use the existing junction and turn left into Coombes Road. This existing junction could then be used to turn left only as a southbound exit. This could be the compromise that suits all concerned and utilises the existing Coombes Road access junction with very little alteration, while still allowing local Lancing College their preferred access route. This may well serve all parties concerned in the wider Coombes area in a far more logical, appropriate and financially beneficial way.



**Adur Floodwatch Group (AFG) objects** to the application and comments that,

### ***“Flood Risk***

*Firstly, apart from the development site being predominantly within an area of high surface water flood risk (Environment Agency 3a rating), more importantly, it is also in an area of up to greater than 75% risk of flooding from groundwater. (See attached Adur Worthing Groundwater Flood risk map) . A recent Adur-Worthing SFRA map for groundwater flood risk also shows that much of the site is within an area where ground water levels are between 0.025m and 0.5m below the ground surface. (see attached JBA document).*

### ***Flooding on Eastbound A27***

*The Flood Risk Assessment (FRA) acknowledges there are locations of groundwater emergence in the vicinity (item 3.4.2) but makes no reference to management of the regular flooding events of A27 eastbound carriageway and the impact this development will have on those recurring issues. The intended removal of trees, scrub and regrading of the ground along the Highways England owned margin which runs on the north side of the eastbound carriageway of the A27 is of great concern.*

*Trees, bushes and brush uptake water, act as a buffer to flows and also help with uptake of carbon from this overburdened highway.*

*With the increasing annual extreme weather events, particularly evidenced during the last 10 years, the eastbound carriageway has been repeatedly flooded, creating nearside lane closures of the eastbound carriageway and severe traffic delays preventing smooth operation of this overburdened strategic road.*

*Highways England's (HE) comments of the 16.12.20 express concerns on the link road's traffic and road design and impacts on the SRN but does not include any statements to do with these flooding events which will inevitably increase and cause significant issues on the A27.. This surely must be a major concern for the operation of this section of the A27.*

Winter 2012/13



Winter 2013/14



Winter 2019



*The proposed felling of trees coupled with earth removal and regrading of this margin of land will inevitably exacerbate these problems of flooding. The cause of these events is the emergence of spring lines along approximately 1000 metres of the kerb line of that eastbound carriageway. This occurs from west of the Hoe Court junction along to the Sussex Pad.. When the retention of water within the Downs and its aquifers become saturated, inundation occurs, ground and surface waters flow into the lower coastal areas including this eastbound carriageway of the A27.*

*As recorded by Adur Technical and the WSCC Lead Drainage authority, this not only causes A27 flooding but groundwater drainage issues within the Lancing area and inundation of sewers with loss of foul waste facilities for sometimes weeks at a time.*

*This has occurred 5 times out of the last 8 winters with up to extreme 1 in 100 year rainfall events.*

*The re-engineering works to improve drainage on the Lancing stretch of the A27 in winter 2012/13 did not remedy the flooding on the eastbound carriageway as covered above.*

*Whilst not posted on the National Park's planning portal, it is relevant at this point to reference the comments of the Adur Technical Dept on this A27 flooding issue as posted the 3.12.20 on the Adur Planning Portal. This A27 problem is known to Adur Technical and on their historical records.*

### **Removal of Trees/Bushes and Brush**

*The application projects that there will be a loss of 2128m<sup>2</sup> of woodland and scrub.*

*AFG wishes to challenge this figure. We draw your attention to the tree removal plan as attached.*

*AFG is certain this belies the reality of how much area of trees are planned to be removed. See tree removal plan – red hatching.*

*Referencing the Google link below -when open, you can 'click' down the eastbound carriageway westwards (opposite direction to traffic flows). These Google views were done with trees in full leaf. In AFG's opinion, there will definitely be more tree removal than indicated on the removal plan (red hatching). There are trees and bushes closer to the A27, particularly for the first section going west from the Sussex Pad.*

*<https://www.google.com/maps/@50.8414403,-0.2965983,3a,75y,270h,94.91t/data=!3m6!1e1!3m4!1sWGsEyeBnM-LbuZXp2I3OQw!2e0!7i13312!8i6656>*

*Almost certainly those trees and scrub will surely be removed to create the regraded land for the link road and landscaped bank down to the A27.. This is borne out by the site section drawing attached which does not indicate any trees/foliage between the link road and the A27, only a grassed bank.*

*AFG comments that the tree removal plan does not reflect the full level of work proposed for tree and foliage removal and loss of environmental habitat. AFG requests clarification on this aspect. More felling and scrub removal will worsen this flooding problem even further.*

### **Unaddressed Issue for the Link Road**

*Another consideration is that with the cutting into the high bank and with the regraded land for the link road, the pathways of these natural spring lines which occur in extreme events could well be exposed. In that situation, flooding from rising groundwater could*



*also manifest itself on the link road as well. With its gradient, any flows down to the Coombes Road West could have drainage implications for the properties and nursery school there. The surface water proposals and attenuation plans have not looked at or considered this possibility.*

*If severe, it could cause link road closure with no other local access to the College or the Coombes Road with the closure of the existing Coombes/A27 junction.*

*That would result in traffic backing up onto the new roundabout and affect the operation of the SRN.- a traffic problem which Highways England within their submission has already expressed its concerns to do with the link road.*

*This is another reason why a survey of winter groundwater levels is required as per the request by the Adur engineer in the attached first submission to Adur.*

*If the authority is mindful to approve and, for whatever reason the link road has to be closed, loss of local access for the College and residents will result. This is another sound argument why the Coombes Road junction with the A27 should remain open.*

### **Final comment**

*Considering the points made above, Adur Floodwatch Group **strongly objects** to this proposal. It does not comply with the NPPF which states that a development should not cause drainage problems elsewhere. It also does not satisfy the policies set out in the SDNPA and Adur Local Plans. In respect of drainage, AFG is certain that this proposal is unsustainable. Adur Floodwatch Group requests that consideration for refusal should be applied.”*

**Adur Residents Environmental Action (AREA) strongly objects** to the proposed 4th arm on the A27 new roundabout and comments that,

### **AIR POLLUTION**

*The construction of the 4th arm link road brings traffic nearer the nursery school in the Sussex Pad with resulting increased air pollution, particularly as the prevailing wind is from the SW. The effect of air pollution on young children is very well documented – effects on lung growth, increased risk of asthma, decrease in concentration. The effects of air pollution have been highlighted recently by the death of Ella Kissi-Debrah. The coroner ruled that illegal levels of air pollution, primarily from traffic, caused the death of the 9 year old.*

**REMOVAL OF BANK** – *The removal of many of the trees and shrubs, which are a natural barrier to air and noise pollution, will increase the risk of health effects. While we acknowledge that there are plans to replace the foliage, it will take many years to mature and recreate the natural barrier to both air and noise pollution.*

## **AIR POLLUTION EFFECTS ON CYCLISTS, PEDESTRIANS AND EQUESTRIANS**

*The rerouting of cyclists, pedestrians and equestrians (NMUs) so that they are required to proceed beside the over - capacity A27 to gain access to the National Park increases safety risk, in terms of air pollution, noise and risk of injury from traffic.*

*As traffic increases by approximately 8,000 cars per day with the development of the 600 homes on New Monks Farm, the additional traffic to the commercial space on the airport site and to IKEA, the danger to NMUs, particularly equestrians, of proceeding along the 4th arm beside the A27 will be greatly magnified in terms of air pollution, noise and personal safety.*

*The UK Parliamentary Inquiry on Air Pollution <https://www.parliament.ukinquiries> stated that in buildings closer than 100 metres to a busy road people suffer from 30% higher exposure to PM2.5 and 37% higher exposure to NOx – and that especially includes schools. The nursery school in the Sussex Pad is approximately 20 metres from the main carriageway of the A27. The pollution from the link road traffic will exacerbate the problems even more putting the occupants of the nearby buildings and school in even greater danger of health problems. The health of children should be of prime consideration.*

## **COMPARISON OF MODELLED AND ACTUAL AIR QUALITY MEASUREMENTS**

*Adur Residents Environmental Action (AREA) has undertaken measurements of NO2 throughout Adur, paying particular attention to the stretch of the A27 between Lancing Manor roundabout and the Shoreham flyover. We have used the same type of TEA acetone based diffusion tube as Adur Council. Analysis was undertaken by Gradko International, also used by Adur Council. We have attached the Gradko analysis sheets for April 2017, February 2019 and October 2020. Readings were taken over a month which means that an under read is more likely than for a shorter exposure period. Our figures are not bias adjusted. Adur Council readings are averaged over a year, based on monthly readings and are bias adjusted.*

*The certified Gradko analysis sheets are shown in the appendices 1 – 4 below.*

<b><u>AREA A27 readings for NO2 in u /m3</u></b>	<b><u>2017</u></b>	<b><u>2019</u></b>		<b><u>2020</u></b>
200 yd sign	27.24	52.44	<b><i>45.62</i></b>	42.04
400 yd sign	54.2	59.87	<b><i>46.68</i></b>	53.66
SW Corner of Manor Roundabout	58.14			
NW Corner of Manor Roundabout	43.84	55.64	<b><i>48.41</i></b>	

*The readings at the 200 and 400 yard sign are nearer the Sussex Pad stretch than the Adur readings and are therefore more relevant.*

*Figures in red italics are bias adjusted using the 2019 Adur figure of 0.87. Please note*

*that the 2020 figures were done when traffic was reduced due to Covid but in spite of that they are above the legal limit. Tubes were placed at a height of 2 metres and were at the kerbside or central reservation.*

**NOTE the marked increase between 2017 and 2019.** All 2019 readings are well above the legal limit of 40µ/m<sup>3</sup>, even after being bias adjusted.

### **ADUR COUNCIL READINGS**

**Adur Council has not monitored the eastern stretch of the A27 near the Sussex Pad.** Their figures only include the western end of the A27 near the Lancing Manor roundabout.

#### **Adur council readings for NO2 at the two monitoring spots nearest the Sussex Pad.**

	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>
S11 opposite Lancing Leisure Centre	35.6	36.3	35.1	32.5
S25 next to Mash Barn Lane	28.8	28.9	30.4	26.2

*S11 was placed at a height of 2.7 metres and was 2 metres from the kerb.*

*S25 was placed at a height of 2.5 metres and was 6 metres from the carriageway.*

*Adur Council's figures are bias adjusted and distance corrected which makes them considerably lower. The higher the tube the lower the readings. The further from the road the lower the readings. This would account for some of the differences between the readings done by AREA who placed their tubes at breathing height and nearer the roadside and therefore got higher readings.*

### **INACCURACY OF PREDICTED BACKGROUND POLLUTION LEVELS**

**8.4.2** The applicant predicted NO2 levels for 2018 at 14.6, 2019 at 14.2 and 2020 at 13.5, well below the actual readings.

*As particulate levels usually reflect levels of NO2 this indicates that predicted levels for particulates are also inaccurate. Methodology used is not location specific but relies upon high level data inputs which fail to reflect the true position on air quality.*

### **NO PLANNING DECISION SHOULD BE BASED ON INACCURATE AIR POLLUTION READINGS**

*Local planning policy states that “development should not result in pollution or hazards which prejudice the health and safety of the local community and the environment.” AREA believes that cyclists, equestrians, local residents and the young children*

*attending the nursery will be exposed to pollution and hazards which will cause injury to their health and personal safety.*

## **NOISE POLLUTION**

*The report by DMH Stallard states; “It is likely that there will be some increase of vehicular noise to these residential occupiers resulting from the rerouting of traffic, but given the existing noise environment, it is considered very unlikely that this increase will be significant.” So, basically the theory is that more noise won’t matter even though the noise levels are already above the WHO limits!*

*Noise levels at the identified receptors of the Nursery school and the dwellings at the Sussex Pad, Coombes Road West are already well above WHO limits. Surely these excesses should be mitigated before this new link road development is even considered.*

## **CONCLUSION**

*Based upon the above information this proposed link road location represents increased health hazards to the public. AREA believes that this development should be refused.”*

### **AREA's Response to Phlorum (applicants Air Quality Consultants):**

*“AREA is responding to the reply from Harley Parfitt at Phlorum to our comments regarding air pollution. Relating to the 4th arm , New Monks Farm.*

*We accept that NO2 does disperse quite quickly. However, PM10 can stay in the air for minutes or hours and can travel as little as a hundred yards or as much as 30 miles. PM2.5 can remain airborne for long periods and travel even further, up to hundreds of miles. Because PM2.5 is made up of things that are more toxic, like heavy metals and carcinogenic organic compounds, PM2.5 have a worse effect on health. Yet Phlorum dismisses the increased effects of particulate matter by stating that increases in annual mean PM10 (ignoring PM2.5) as a result of the proposed development are even less significant than NO2. Does that statement take into account the fact that the ultrafine particles of PM2.5 can penetrate deep into the lungs and get into the blood stream and that they do not disperse as readily as NO2.*

*The American Heart Association states that “exposure to PM2.5 over a few hours to weeks can trigger related mortality and non-fatal events.” Longer term exposure increases the risk for cardiovascular mortality.*

*The UK Taskforce for Lung Health states that, according to NHS England data, an “average of 5% of deaths in those aged over 30 can be attributed to PM2.5 air pollution.”*

*Phlorum concentrated its comments on Adur Council's and AREA's measurements of NO<sub>2</sub>. It's chart (Table 1 of Phlorum response) showed estimated pollution rates for NO<sub>2</sub> at the Sussex Pad Nursery as being over 30 for 3 of the 4 sites along the A27. The highest, at 36.1 µ/m<sup>3</sup> is just below the recommended limit of 40µ/m<sup>3</sup>. There are no measurements available for the most relevant stretch of the A27 nearest the nursery. Is it not the council's and the developer's duty to provide as much up to date, accurate information as possible? When dealing with issues that affect people's health, reliance on modelled predictions is not good enough. Surely the school and housing should have been monitored for a period of real time measurement at the 1.5m fascia levels for PM<sub>2.5</sub> and NO<sub>2</sub> to be certain of the levels of these toxic pollutants before an application was submitted.*

*Phlorum is relying on modelling for its predictions of PM<sub>10</sub> and PM 2.5. In Parliament on February 3 Therese Villiers, in discussing the Environment Bill, stated that PM<sub>2.5</sub> is the most dangerous aspect of air pollution. She recommended that World Health Standards of 10µ/m<sup>3</sup> become a legally binding target, lowering the recommended UK target from 25µ/m<sup>3</sup>. The effects of PM 2.5 on the health of the children in the nursery and those living right beside the link road must not be dismissed.*

*"No threshold for PM has been identified below which no damage to health is observed. Since the burden of air pollution on health is significant at even relatively low concentrations, the effective management of air quality is necessary to reduce health risks to the minimum." (www.euro.who.int)*

*The 4th arm will exacerbate the levels of pollution already experienced by children in the Sussex Pad nursery and nearby residents from the A27 pollution. In Table 8-12 of the ES the annual mean of 2.5 is modelled to be between 10.5 and 11.4 in 2018 with a slight increase by 2031. Yet, WHO standards and those currently being discussed in Parliament in relation to the Environment Bill are lower than the figures in Table 8-12. In other words, the modelled figures in the table do not meet the standards recommended by the WHO.*

*This is more than just about modelled calculations based on standards not accepted by the WHO. It is about the long-term effects on health of the nearby receptors, children who are particularly vulnerable to the effects of particulate pollution and the older residents of the homes which will be directly beside the link road. Developers should not be working to the lowest possible standards of air pollution, particularly given the ongoing parliamentary discussions on the Environment Bill and the recommendations of the Climate Change Committee."*

**The Lancing Manor (SE) Residents' Network** comments that there has been a lack of consultation with the three residents at Sussex Pad directly affected by the scheme and there has also been a lack of consultation with local cycle groups and the British Horse Society. The Residents' Network, in particular, comment that,

*Incorrect Boundaries & House Name In the layouts for this scheme for those three properties, their boundaries are totally incorrectly shown (see Illustrative Plan). Obviously, these have been taken from very old plans of the Sussex Pad location. They seem to indicate that access to particularly the Pad Farm House could be at the rear of the dwelling. That property has been wrongly named on the plan as the 'Old Farmhouse'. This is to confirm that all three, Pad Farm house, Honeyman's Cottage and Old Farm Cottage all have access to their properties from Coombes Road West. If the through road is approved, when travelling westwards, this will entail vehicles having to do so across the flows of traffic. Clarification on existing approval for Coombes Road/A27 Routings.*

*Also, whilst writing, WSCC Highways restated the current approval requirement for traffic leaving the Coombes Road to travel both east and west. Our understanding is that with a left turn at the A27 junction with Coombes Road, westbound traffic would use the roundabout under the Shoreham Flyover and gain west bound A27 access using the onslip there (about only 1.4 miles – not the U turn at Hangleton). For traffic coming to Coombes Road from the west, our understanding is that vehicles will cross the proposed new NMF roundabout in an easterly direction and then turn left into Coombes Road with no U turn requirement. Could Highways authorities kindly confirm that these routings for what is currently approved for the New Monks Farm development are as per our understanding.*

## **Representations - Letters of Support**

In total 40 letters of support have been received raising the following points.

- i. The Fourth Arm has significant advantages for westbound traffic leaving Coombes Road which is why it is supported. Joining the A27 westbound traffic from Shoreham flyover would be a slow and tedious diversion especially at rush hour. This route is already congested without additional traffic from Coombes Road.
- ii. As an employee of Lancing College and Nursery Manager of Little Lancing Day Nursery, I am hopeful that the proposal will improve access, as without this Fourth Arm, we would need to rejoin the A27 and travel eastbound around the flyover to travel westbound causing more traffic and air pollution.
- iii. As a staff member and resident at Lancing College, I fully support the proposal and I feel it is the most efficient and, more importantly, the safest option of access for thousands of staff, pupils, parents and visitors that come to the College annually. The plans for the provision of safety measures for cyclists and pedestrians on this new road are of particular interest to myself, as someone with a young family that often walk/cycle to the nursery and school in the local area.

- iv. It will be important to manage the speed limit where current A27 traffic speed has brought about several incidents over the past year at the current Sussex Pad junction.
- v. The proposal is very important for all users of the locality including Lancing College and this is an important opportunity to protect the access to the College for future generations. It will then provide efficient and effective access for many parents, staff and visitors to and from Lancing College for travel in both directions. It is very important for the schools future stewardship of the Historic Estate.
- vi. The Greater Brighton Metropolitan College supports the application on the basis of substantial transport benefits.
- vii. The proposed Fourth Arm is a workable solution to the difficulties created by the approved NMF scheme to the College operations and it is equally a practical solution to what will be also a serious frustration to Coombes Road residents and users.
- viii. For many years the A27 has been a frustration, especially at peak hours, to all local residents trying to access Coombes Road. There is a longer term solution to these difficulties but it would be a serious mistake at this stage not to include the Fourth Arm link which will protect and enhance local communication in so many important ways.
- ix. On behalf of WD Passmore and Sons, it is submitted that,
  - We are a long established arable sheep and beef farming business on Coombes Road and also have business lets. Good, safe road access is important to our business
  - The already approved road works would increase the distance and time taken for westbound traffic and we also have safety concerns about slow moving traffic attempting to merge onto the A27 from Coombes Road without any traffic lights.
  - We broadly support the proposal for the Fourth Arm but would like consideration to be given to ensure that the access is a suitable width for HGVs, including the provision for two to be able to pass each other easily in opposite directions. HGVs are vital to our business and are not going to get any smaller so it is vital that the scheme is future proofed. It is also important that the sequencing of the traffic lights on the roundabout allows good traffic flow in and out of Coombes Road and avoids congestion.
  - There are clear economic and environmental advantages to the Fourth Arm as set out in the supporting documents. Regarding traffic, it also removes the need for vehicles exiting the College to filter onto a fast moving stream of traffic and does not direct additional traffic onto the roundabout under the flyover which is already congested at peak times.

- x. It is vital to help protect the operations and attractiveness of the College and other uses of the College and in turn to protect the substantial economic, social and environmental benefits that the College provides for the local area. It will enable the College to continue its stewardship of the Historic Estate and its Grade I and Grade II Listed Buildings.
- xi. Based on updated traffic counts on the Coombes Road undertaken in January 2020, this will enable vehicles to use the new proposed route and save 466,344 kilometres in journey distances per annum, 9,144 hours in travel time per annum, £42,133 in car fuel costs per annum and 57,797 kg CO<sub>2</sub> in car based emissions per annum. These savings will benefit all residents, businesses and other users of Coomber Road. The new link and path will be set back and screened from the A27 providing a safe and more tranquil connection with Coombes Road and the National Park.
- xii. The proposed new route minimises the impact of the Fourth Arm on the landscape and on ecology. It will maximise use of the existing adopted highway at Coombes Road, minimising the area of additional hard landscaping required. It will follow the existing contours of the landscape along the A27, minimising its impact on the existing embankment, minimise tree removal and impacts on established habitats, including new tree plantain and other landscape enhancements.
- xiii. As Director of Lancing Equestrian Ltd, I would like to fully support the new roundabout as it immediately reduces the current risk for vehicles that need to travel west on leaving the Equestrian Centre by removing the need to cross the A27 carriageway at the current 'U' turn point. The roundabout will also have the effect of slowing traffic on the approach from the west, again reducing risk for users turning out onto the A27 at the junction of Hoe Court and the A27. The introduction of the Fourth Arm poses no additional risk to the Centre and, in fact, further reduces risk to both the Equestrian Centre and Lancing College.

**Coastal West Sussex Economic Partnership** expresses its strong support for the proposal and comments that,

*"The Coastal West Sussex Economic Partnership has a focus on the larger than local economic issues that impact on our coastal economy. We are a business-led partnership bringing together senior leaders from industry, education and the public sector to take action and use its individual and collective talents to make a difference in the local economy."*

*The CWS Partnership gave its full support to the original New Monks Farm application but recognised the shortcoming of the road network by not enabling direct access to Lancing College and the other road users of Coombes Road.*



*This new application for a 4th Arm will provide significant benefits of reduced journey times, travel distances and vehicle emissions for all those users of Coombes Road and the new arm will also enable much easier and direct access to and from Lancing College and the A27.*

*Considering all the positive benefits that this road link will bring, on behalf of the CWS Partnership, I would like to offer our support for this application and look forward to hearing about its progress.”*

## **Relevant Planning Policies and Guidance**

**Adur Local Plan 2017** in particular Policy 5 relating to New Monks Farm:

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.

Other relevant policies of the Adur Local Plan are:

Policy 1: The Presumption in Favour of Sustainable Development

Policy 2: Spatial Strategy

Policy 4: Planning for Economic Growth 25

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 28: Transport and Connectivity

Policy 29: Delivering Infrastructure

Policy 30: Green Infrastructure

Policy 31: Biodiversity

Policy 33: Planning for Sustainable Communities

Policy 34: Pollution and Contamination

Policy 35: Water Quality and Protection

Policy 36: Flood Risk and Sustainable Drainage

### **South Downs National Park Local Plan 2021**

Members will be less familiar with policies of the National Park Local Plan and therefore these are set out below:

Policy SD1 indicates that the Council will take a positive approach to proposals that accord with relevant policies contained within the Local Plan, working with Applicants to identify solutions to ensure proposals can be approved without delay. It goes on to identify that the purposes of the National Park are to conserve and enhance the natural beauty, wildlife and cultural heritage and to promote opportunities for the understanding and enjoyment of its special qualities. Planning permission will be refused where it does not protect these interests unless the benefits of the proposal demonstrable outweigh the great weight attached to these interests and there is substantial compliance with other policies in the plan.

SD2: Ecosystem Services - Policy SD2 highlights that development proposals will be permitted where they will have an overall positive impact on the natural environment to contribute to goods and services. In order to demonstrate this proposals must be submitted with a statement setting out its positive contribution towards ecosystem services.

SD3: Major Development - Policy SD3 indicates that in determining whether proposals constitute development, the Council will consider whether they are of a scale, nature or character that has the potential to have a significant adverse impact on the special

qualities of the National Park, which will consider the impact of cumulative development and characteristics of each proposal and its context.

SD4: Landscape Character - Policy SD4 states that development proposals should only be permitted where they conserve and enhance the landscape character by demonstrating that:

- They are informed by landscape character, reflecting the context and type of landscape in which the development is located;
- The design, layout and scale of proposals conserve and enhance existing landscape and seascape character features which contribute to the distinctive character, pattern and evolution of the landscape;
- They will safeguard the experiential and amenity qualities of the landscape; and
- Where planting is considered appropriate, it is consistent with local character, enhances biodiversity, contributes to the delivery of GI and uses native species, unless there are appropriate and justified reasons to select non-native species.

SD5: Design - Policy SD5 indicates that development will only be permitted where a landscape-led approach is adopted. Proposals must respect local character through sensitive and high quality design that makes a positive contribution to the overall character and appearance of the area.

SD9: Biodiversity and Geodiversity - Policy SD9 focusses on the biodiversity and geodiversity of the National Park and states that development proposal will be permitted where they conserve and enhance biodiversity and geodiversity, giving particular regard to ecological networks and areas with high potential for priority habitat restoration or creation. It continues to state that development which adversely impact international protected sites (SACs, SPAs or and Ramsar sites), national protected sites (SSSI, NNRs and MCZ), irreplaceable habitats (Ancient woodland and veteran trees) and locally protected sites (SNCI, Local Wildlife sites, SINC, LNS and Local Geodiversity Sites) will be refused, unless exceptional circumstances clearly outweigh the adverse effects and a suitable mitigation/compensation strategy exists.

SD10: Trees, Woodland and Hedgerows Policy SD10 states that development proposals will be permitted where they conserve and enhance trees, hedgerows and woodlands. It continues to state that development proposals that affect trees, hedgerows and woodland must demonstrate that they have been informed by a full site survey, including an ecological survey, arboricultural method statement and associated tree protection plan, and include a management plan. Further detail is given by stating that trees, groups of trees, woodland or hedgerow can only be removed under exceptional circumstances and that suitable replacement planting will be required. It then continues to state that opportunities should be identified and incorporated for planting of new trees, woodlands and hedgerows. New planting should be suitable for the site conditions, use native species and be informed by and contribute to local character.

SD12: Historic Environment - Policy SD12 states that proposals will only be permitted where they conserve and enhance the historic environment, including the safeguarding of heritage assets and their setting.

SD19: Transport and Accessibility - Policy SD19 indicates that proposals will only be supported where they are located and designed to minimise the need to travel. Development proposals must demonstrate the continued safe and efficient operation of the strategic and local road networks.

SD20: Walking, Cycling and Equestrian Routes - Policy SD20 states that proposals will be permitted where they contribute to a network of attractive and functional non-motorised travel routes, with appropriate signage.

SD34: Sustaining the Local Economy - Policy SD34 states that development proposals that foster the economic and social well-being of local communities provided that they meet one of the following (inter alia): promote and protect businesses linked to the National Park's key sectors.

SD42: Infrastructure - Policy SD42 indicates that proposals for new infrastructure will be supported where:

- It represents the least environmentally harmful option reasonably available, also having regard to operational requirements and technical limitations; and,
- The design minimises the impact on the natural beauty, wildlife and cultural heritage of the National Park and the general amenity of local communities.

National Planning Policy Framework (February 2019)

### **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.

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:

- Purpose 1: Conserve and enhance the natural beauty, wildlife and cultural heritage
- Purpose 2: 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.*' The purposes are governed by the 'Sandford Principle' (included within the Environment Act 1995), which states that "If it appears that there is a conflict between those purposes, [the National Park Authority] shall attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area".

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. The majority of the planning application lies within the National Park.

There are a number of other duties placed on planning authorities regarding biodiversity enhancement and the countryside. 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.

## Planning Assessment

As the application site straddles across two local planning authority areas, duplicate planning applications have been submitted to Adur District and the National Park. Both authorities are required to approve the applications to enable the development to be implemented. If one authority elects to refuse the application the applicants would have to gain permission at appeal to be able to implement the scheme. Your Officers have been working closely with the case officer at the SDNP to share consultation responses and ensure that areas of concern have been addressed by the applicants. It was intended that the SDNP Committee would consider this matter first at its meeting on the 8th July 2021 but this meeting was cancelled. As indicated earlier in the report it is likely that this application will now be presented to the SDNP Committee on the 12th August 2021.

The main planning issues are as follows:

- The principle of development having regard to Local Plan policies
- The impact of the development on the National Park having due regard to the special purposes of the Park (including ecology and biodiversity considerations)
- The impact on highway safety including the impact on Non-Motorised Users
- The impact on residential amenity (including air quality, noise and vibration issues)
- Flood risk and Drainage.

## Principle of Development

In many respects this is an unusual application, in that the proposal is not required in highway terms to support development but it seeks to address what was considered a weakness with the approved scheme for the development of New Monks Farm (NMF) for 600 houses and a new non-food retail store. Lancing College expressed serious reservations about the NMF development and only withdrew its objections to the development on a commitment from the NMF developer - The Community Stadium Ltd to pursue this application for a 4th Arm. In considering the NMF application Planning Committee raised concerns about the negative impact of the development on the future viability of the College without the 4th Arm and other bodies notably Historic England also passed comment as indicated in the extract below from one of its consultation responses to the application,

*'Historic England is aware of and has been copied into the concerns raised by Lancing College on potential impacts to their successful operation arising from the proposed access proposals. We have visited the site and understand and share their concerns. We would not want to see this, historically highly significant, educational establishment comprising purpose-built, architecturally outstanding buildings put at risk. We therefore note and welcome the discussions that have taken place to resolve this matter. Historic England supports the view put forward by the College that agreeing an acceptable solution to the issue raised regarding access to the campus is important and that it is vital this is secured as part of the current process.'*

The background to this application is important to understand the context. It is also important to note that the roundabout and road infrastructure necessary to unlock the housing and employment sites at both New Monks Farm and the airport were supported by £7.8 million of Local Growth Funding and in granting the award of funding the Coast to Capital Local Economic Partnership were very supportive of the College's request for improved access and the delivery of the fourth arm.

In terms of policy compliance your Officers accept that there is general policy support in the Adur Local Plan. Policies 5 and 7 of the Adur Local Plan specifically seek a comprehensive package of highway measures to address access issues off the A27 for these strategic developments. Whilst these developments have already secured permission, the applicants have highlighted in detail the benefits to Lancing College and other users of Coombes Road of a more direct access to the trunk road and in general terms Highways England supports the reduction in the number of access points onto trunk roads. The sustainability policies of the Adur Local Plan and County Council policies seek to reduce car usage/mileage and therefore the scheme which seeks to reduce unnecessary vehicle miles by avoiding traffic having to leave the A27 and rejoin to travel westbound is supported in principle subject to other Local Plan policies being supported. Although there have been some conflicting comments about the extent of any reduced movements, the reduction in vehicle emissions submitted by Air Quality Consultants on behalf of the applicants is supported (this is discussed later in the report).

In terms of the National Park Local Plan (SDNPLP), Policy SD1 resists development anywhere within the Park unless it protects or enhances its natural beauty, wildlife and cultural heritage and promotes opportunities for the understanding and enjoyment of these special qualities. It states that permission will be refused unless it protects these interests, or that the benefits of the proposal would demonstrably outweigh the significant weight that should be applied towards meeting the above aims. The proposal must also be otherwise compliant with other policies within the SDNPLP.

The benefits of the application are set out in the supporting statements from the applicants. The EIA tests the alternative options to improve access for Coombes Road traffic and it is accepted that the chosen option is the most acceptable from a highway perspective ensures that the road is contained as far as possible within the lower A27 corridor and joins an existing section of public highway (Coombes Road (west)). Inevitably the construction of a 330 metre section of new road which cuts into the existing roadside plantation embankment will have some landscape impact but with appropriate mitigation (discussed below) it is considered that the principle of development could be supported in view of the overall benefits of the scheme.

The detailed supporting statements from the applicants highlight both direct and indirect benefits which could, subject to compliance with other policies, override the initial landscape impact of the development. The direct benefits of the fourth arm are a reduction in journey times, journey costs, fuel related emissions, and perceptions of



safety and increased severance between the north side of the A27 (including the Lancing College Estate and the SDNP) and the communities to the south, east and west of Coombes Road. These effects will impact every journey made, and in particular those westbound from Coombes Road East on to the A27.

Lancing College submits that without the fourth arm the approved access solution would add 2.55 km (journey time of 3 minutes) to every trip made westbound from the College creating an additional 466,344 km additional journey distance per annum (based on 182,880 journeys). This excludes special events taking place by the College and others, including Coombes Farm. 6.10 The College states that the above lengthened journeys will have driver delay and fuel cost implications (estimated at a total of £42,133 in total per annum), which again excludes journeys linked with special events.

The indirect impact of not providing a more direct access to the A27 the College claims will dissuade staff, pupils and other users of the Estate from enrolling at the College and others from using its facilities. In summary the College submits that the Fourth Arm is essential to ensure that:

- The school remains attractive to fee paying students and others who use the College Estate during and outside of school term times and the income from whom enables its environmental and social benefits packages to be maintained;
- The College can continue to invest in the upkeep of the estate, its environmental programmes and its Listed Buildings;
- That these facilities can remain readily accessible to local children and visitors who benefit from assisted school places and access to the SDNP;
- The College's employment, local supply chains and wider economic multiplier benefits are maintained; and,
- Physical and operational links between the College and the wider local community are not harmed as a result of increased journey distances and perceptions of increased physical severance and safety; impacts that would also harm access to the SDNP for the significant number of visitors who use the College Estate as a gateway to the National Park.

The College has also indicated that all of these issues have been heightened and intensified due to the impacts of COVID-19 and Brexit which are (on their own) likely to have long-standing implications on the ability of the College to meet all of its obligations as custodians of the estate and its Listed Buildings.

Whilst the benefits of the College are accepted it is also submitted that all users and businesses served by Coombes Road would benefit from the proposed Fourth Arm. Whilst some businesses have supported the principle of the 4th Arm (in particular

Coombes Farm), 13 businesses have signed a letter raising concerns and have put forward an alternative proposal for retaining Coombes Road junction (left in and left out) but retaining the fourth arm for Lancing College traffic. Highways England has however re-iterated that its support for the current proposal is conditional on Coombes Road being closed.

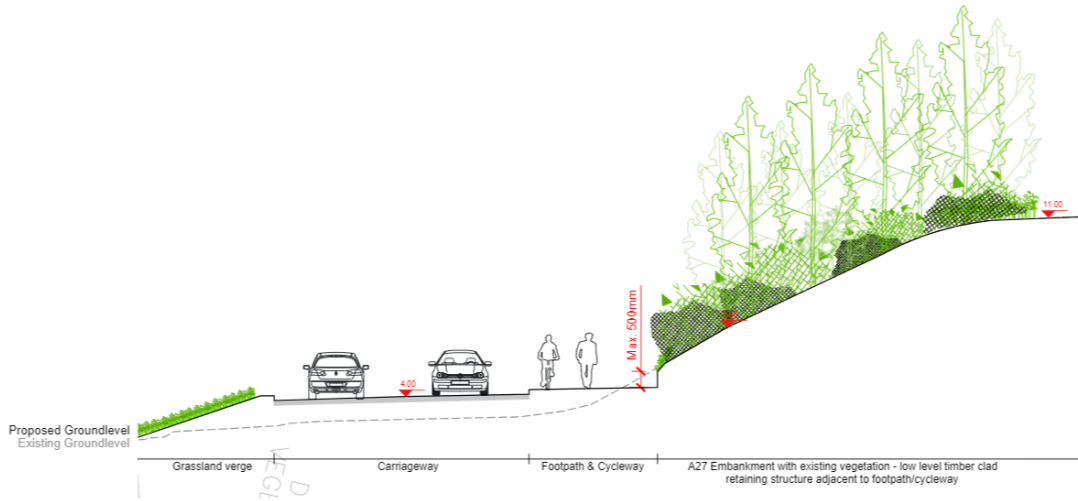
Amendments to the design of the scheme have sought to address some of the concerns of residents and businesses and overall a more direct access to the trunk road is considered, in principle, to be beneficial to existing businesses. Certainly Coombes Farm (and Church) attract many visitors to the Park. Given that the Proposed Development seeks to improve access for local businesses in general and Lancing College specifically, it is considered that the proposal would meet Policy SD34 of the SDNPLP which seeks to support proposals that promote and protect businesses linked to the National Park's key sectors.

### **The impact of the development on the National Park**

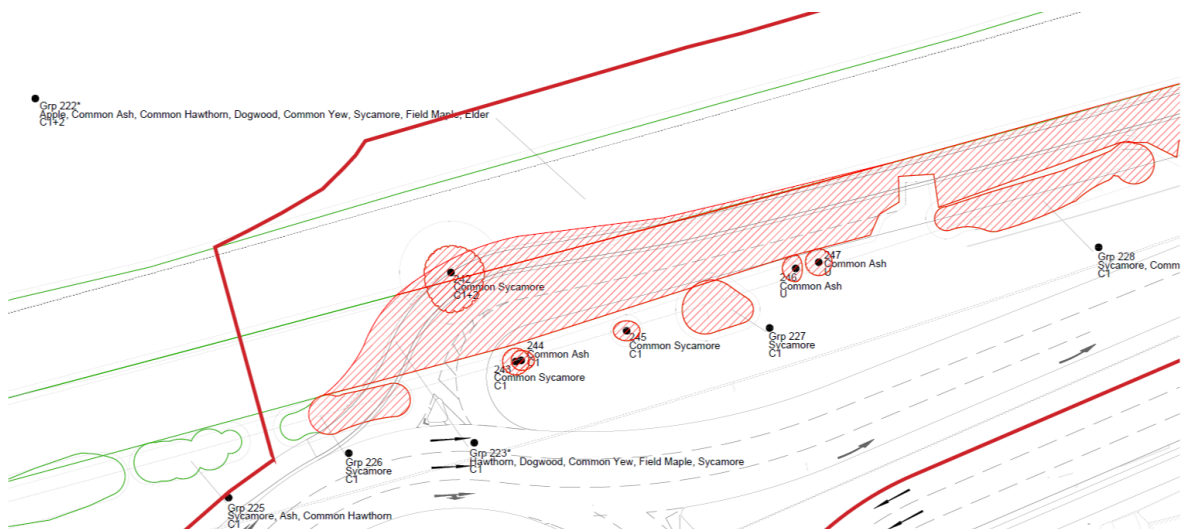
The applicants engaged in pre-application discussions and throughout have been liaising with the National Park to minimise any impact of the development on the National Park. The Landscape and Visual chapter of the EIA assessed the scheme and in particular its impact on the landscape from a variety of viewpoints (19 in total). From day 1 after the completion of the development it concludes that there would be a moderate adverse impact from 5 viewpoints (close views Coombes Road (west) and The Drive and from Lancing Ring and Mill Hill). However, after 15 years the assessment concludes that there would only be a minor adverse impact from 9 viewpoints and a moderate beneficial impact as a result of changes to the existing Coombes Road junction with the A27. The Addendum to the existing assessment concludes that,

*‘Overall, taking into account the effects on the landscape character, the visual amenity and perceptual qualities, the site conserves and enhances the existing landscape. This is through the introduction of high quality planting in the form of woodland, tree and shrub planting as well as wildflower meadow, the latter which is particularly important for ecological mitigation, in addition to the iterative design process carried out with the aim to remove road clutter and create a route which is rural in character. ‘*

The new road will cut into the landscaped plantation on the trunk road embankment - indicated on the cross section below:

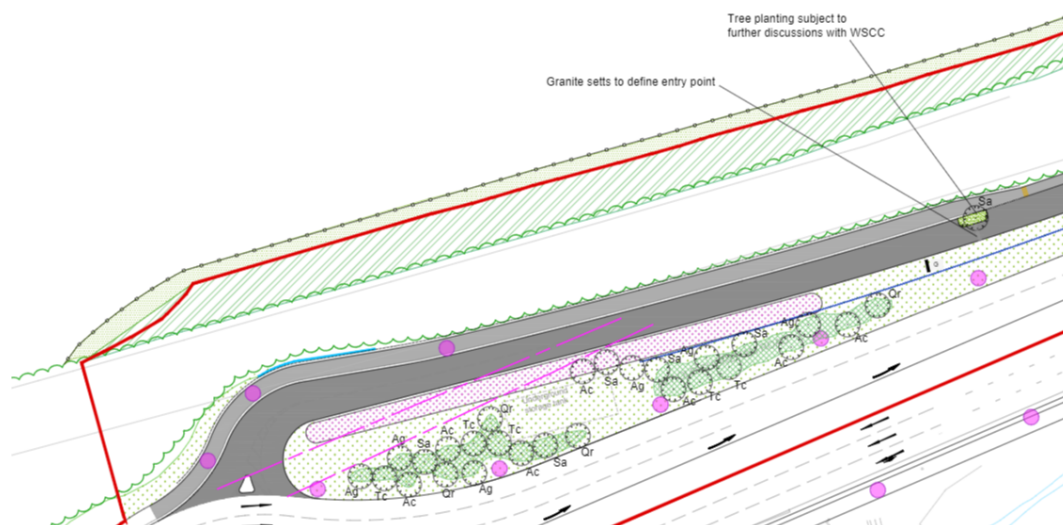


The tree survey accompanying the planning application indicates that the plantation of trees are of Category C defined as trees of low quality with an estimated remaining life expectancy of at least 10 years or young trees with a stem diameter below 150mm. The report indicates that the plantation consists mainly of Apple, Common Ash, Common Hawthorne, Dogwood, Common Yew, Sycamore, Field Maple and Elder with the condition of many of the groups being Category 1 (defined as unremarkable trees of very limited merit or such impaired condition that they do not qualify in higher categories). Nevertheless, there is a significant number of trees affected by the new road, as indicated in the Tree Removal Plan attached below. The total number of trees has not been able to be assessed given the difficulties of access to the dense plantation.



The key changes to the scheme have sought to reduce the visual impact of the new road by reducing traffic calming measures and introducing further landscape features. The plan attached to the report (Appendix II) highlights the key landscape mitigation measures now incorporated into the scheme with key areas of new landscaping being

proposed between the existing A27 carriageway and the new road and within the field to the north of the plantation as illustrated below:



### Biodiversity

The applicants have been keen to highlight the overall biodiversity benefits of the development and have indicated that the scheme would far exceed the emerging requirements set out in the Environment Bill (10% net gain). In this respect the ecologist working on the project has estimated that a 22.59% net biodiversity gain will be achieved and comments that,

*'With the above considered, the habitats lost as part of the development scheme are largely of a lower distinctiveness than those to be created. Where the created habitat is of equal distinctiveness to that lost, the 11 area of new habitat exceeds the existing habitat by more than double. The short length (0.07km) of the low distinctiveness non-native hedgerow is not significant enough to be recognised by the metric parameters. With the remaining hedgerow to be replaced with a native hedge, any loss of this ornamental hedge is infinitely compensated for. As such, a gain in biodiversity is anticipated on site post-development. It should be noted the biodiversity units calculated for the site post-development do not take into consideration enhancement features added such as log piles, rubble hibernacula, bird boxes or bat boxes, all of which are proposed to be installed across the site. It is therefore likely the net biodiversity gain will be even higher as a result.'*

It is understood that the National Park is satisfied with the proposed mitigation measures set out above. However, despite the active pre and post submission negotiations the Park's Landscape Officer considers that the scheme should still show additional landscape benefits and this appears to be the reason why the report did not go forward to the National Park Committees meeting on the 8th July. The SDNP has requested that Lancing College considers taking the field to the north of the plantation out of arable production as a further landscape and biodiversity enhancement. Lancing College has agreed in principle with this request but points out that it had already

agreed to enhance biodiversity within this field with the Parks Rangers as part of its Stewardship Plan. In addition, arable soil is often too rich to be quickly changed to species rich grassland and therefore the College has offered the following approach:

*The field (below) is currently identified for arable rotation within the new draft Farm Stewardship Plan. This would comprise 2 years of legume mix, which in effect is a herbal grass lay. In addition there will be a 6 metre wild flower grass margin around the whole field and 1 HA wildflower corner next to the Sussex Pad, Little Lancing site. New hedges are also to be planted next to Hoe Court and the bridleway, along the west and north boundaries of the field respectively.*



*If LC deviate from this proposed Stewardship layout and remove the legume mix it means a proportion of the College's Stewardship payment will disappear each year and this would have a financial impact. Moving to species-rich permanent grassland will also reduce the capital value of the field by around £200k. Despite this, the Bursar has already obtained the agreement of the Governing Body to authorise this change. However, we should state at this stage that we do not consider that the request can be fully justified in planning terms related to the application before you. It would be going well 'above and beyond' and providing significant enhancement when compared to the limited visual harm caused by the proposal.*

*It must be noted that it will take 3 years before the move to species rich grassland would be achieved since the field in question is currently too fertile to support wild flowers given that it has been intensively farmed as arable. Your Ranger would support this assertion. It will in fact be better to move to grassland over 3 years. Your Ranger also has approved, over the last couple of weeks, the legume mix with our Farm Manager as being very suitable for other SDNP projects such as the Beeline Project.*

*We therefore propose that the planting of the field be rotated as follows to achieve the change you have requested:*

- *Sept 2021-Sept 2022- field put to winter wheat. It is too late to change this since*

*the seed has already been bought and this has been agreed with the contractors. Laying the field to wheat in any case ties in with when the 4<sup>th</sup> arm will be constructed – the following new planting scheme can follow logically after this;*

- *September 2022-2024 - field put to a legume/ herbal grass/ flower mix;*
- *After this date it could go over to a permanent species rich grassland. This would be in addition to the existing extensive planting across the estate and to the further planting that is planned next to the Little Lancing site, as outlined above.*

*The College's farm management team, who have close contact with your Park Rangers, will be very happy to discuss this further if necessary, but the College must of course get its stewardship submission in on time by 30<sup>th</sup> July.'*

Given the extent of biodiversity gain, the minor adverse landscape impact and the wider benefits of the fourth arm for a key stakeholder within the National Park, your Officers have some sympathy with the applicants frustration with this late request for further landscape enhancement. Nevertheless, the College's reluctant agreement to this request does demonstrate the importance of the fourth arm to the future viability of the College given the loss of value that will occur by taking this field out of arable production. The final comments of the National Park are awaited and will be reported at the meeting. Your Officers do agree that the necessary management of this land can be adequately addressed by planning conditions. Outside of the planning process further control can be exercised by amending the Stewardship Plan covering this land.

### *Ecology*

The EIA sets out the survey work undertaken to assess the impact of the development on protected species. The results of the reptile survey gave 'low' populations of common lizard, and a population of slow worms. A single adult male adder was also recorded. Nevertheless the presence of three species of reptiles within the red line boundary classifies the site as a 'Key Reptile Site'. As a result the ecology report states that special consideration should be made to reptiles within the development plan to ensure their continued favourable conservation status.

It is submitted that the survey results are thought to be an overestimation of the true populations present due to an '*excess of refugia used in the survey*'. It is also submitted that the reptiles were largely concentrated along the arable field boundary which is to be subject to limited works restricted to some tree planting, with only a limited number of slow worms found elsewhere on site. In view of this translocation of reptiles is not recommended and mitigation measures involve habitat manipulation through phased vegetation cutting to encourage reptiles away from the works area to adjacent retained habitat.

A range of measures are proposed to enhance biodiversity generally as stated above and specifically for reptiles the habitat creation and enhancement could result in a net increase in opportunities to increase reptile numbers. The gradual change from arable use to species rich grassland would also significantly enhance the ecology of the area and habitat for reptiles.

The Badger Trust criticised the timing of the badger survey, however, the initial badger survey in February was followed by hole monitoring survey. This survey monitored 13 mammal holes between 25th March and 6th July 2020. Five of these holes were located within the red line boundary but only Hole 3 (outside the application site) was proven as an active badger hole in March/April 2020. Monitoring footage of hole 3 suggests that this hole is more recently occupied solely by rabbits. Rabbits, mice, and shrews were found to occupy the mammal holes present within the application site. Nevertheless the ecology report does indicate that evidence of recent badger activity within the application site suggests that the site is suitable foraging and commuting habitat for the species. As a result the report recommends retention and enhancement of the existing functionality of the site as a wildlife corridor.

To mitigate any impact it is proposed to undertake a further site walkover for badger activity prior to the commencement of works on site, to ensure that badgers (highly transient) have not moved into the proposed area of works. During the construction period a number of measures are proposed including covering over at night any pipes/holes/trenches, erect heras fencing. It is also proposed that a suitably qualified ecologist will be present throughout excavation works which involve disturbance to the mammal holes on site.

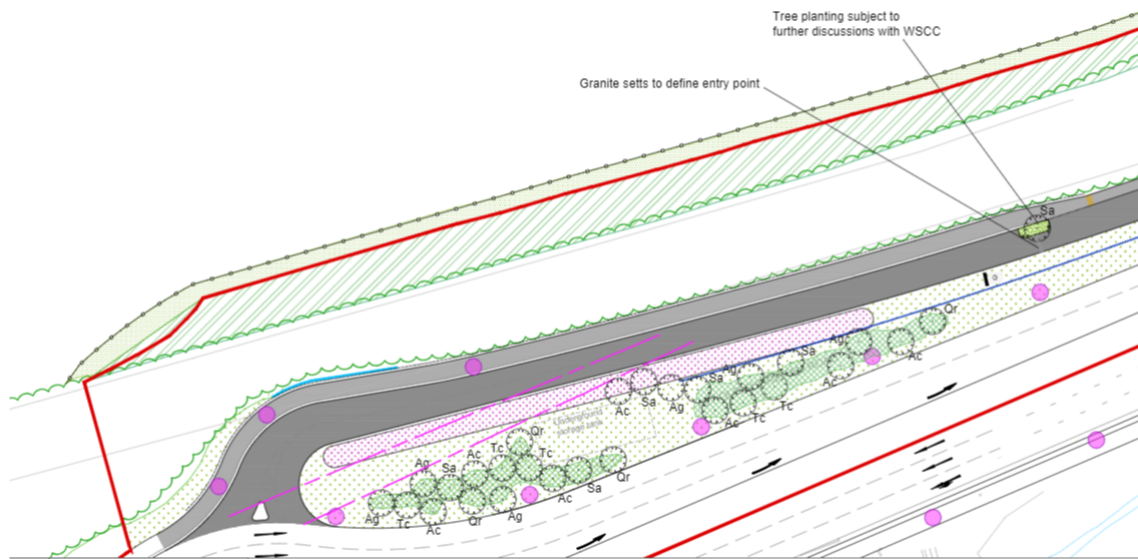
The various measures designed to protect and enhance wildlife would be covered by conditions specifically the ecological management plan.

### **Transport and Highway Safety (including impact on Non Motorised Users).**

The applicants Highway Consultants have been working closely with WSCC and Highways England to address initial concerns about the design of the fourth arm. The concerns of the SDNP about some of the traffic calming measures coincided with WSCC concerns about the initial proposal to create a section of road subject to a 20 mph speed limit. The resulting design has evolved having regard to the guidance set out in 'Roads in the South Downs' and has removed the previous speed calming measures. However, the design of the road will ensure speeds are below 30mph. The geometry of the road effectively has two speed control bends and the most sensitive section of the route alongside the existing properties will have a road narrowing to 4 metres. This together with the treatment of footways and the incorporating of timber bollards will help to reduce traffic speeds but still allow the width of road to enable larger vehicles to navigate successfully.

The road has been designed creating different character areas and adjustments made to ensure gateway features as the character of the new road changes. The first section of the road from the new roundabout is designed retaining a traditional carriageway with 30mph speed limit, centre line markings, advanced directional signage and lighting on the approach to the A27 roundabout. Albeit this lighting will be specified to be 'dark sky friendly' with no upward light. This section would form part of the Strategic Road Network and form part of the road adopted by Highways England.

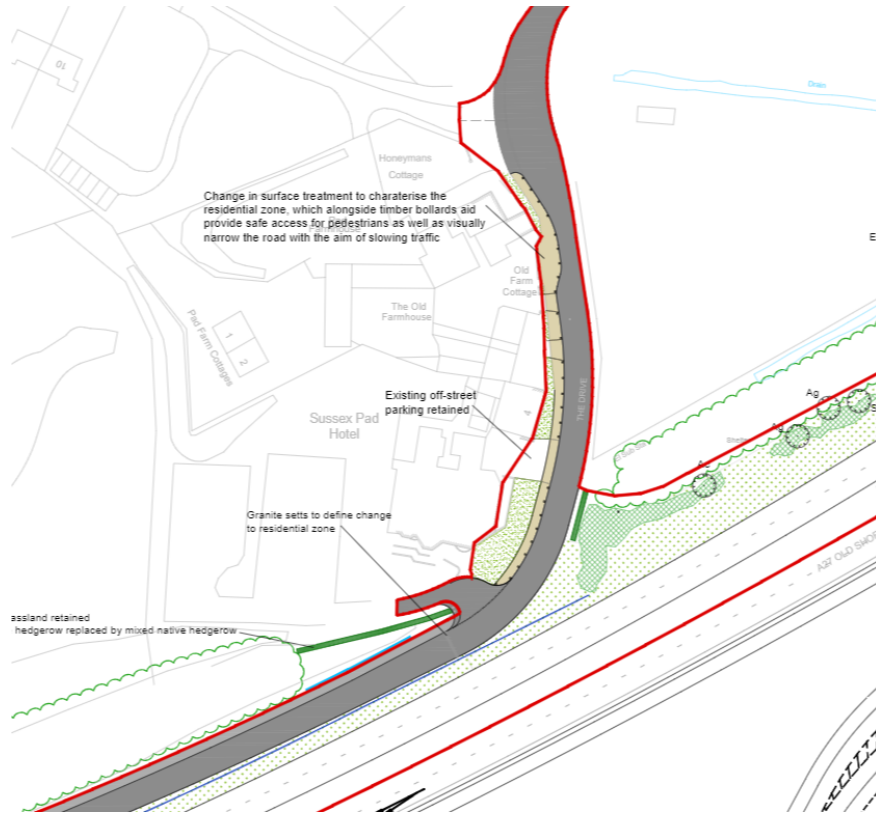




The character of the road changes as part of the transition to the local highway network adopted by West Sussex. A gateway feature (build out) signals the change in character and at this point cyclists would join the road from the shared cyclepath with the narrower 2 metre footway continuing to Lancing College. The change in character of the road is marked by removing centre line markings and speeds generally being reduced through the design of the road (with speed control bends) rather than traffic calming features. Following criticism that the original design did not have sufficient regard to non motorised users the amended plans localised carriageway narrowings have been retained at some locations where still considered to be beneficial to assist the movement of non motorised users whilst also contributing to overall speed management.

The third character area is at the point when the road moves northwards away from the A27 and adjacent to the Nursery and residential dwellings. The previously proposed speed cushions have been removed but the carriageway narrowing is retained to ensure a suitable footway width can be provided whilst also contributing to speed management and increasing the separation between the carriageway and existing properties. The Highway Consultants did consider the use of a different carriageway material through this section, but it was considered that the removal of the centreline combined with an alternative buff-coloured material on the footway '*would provide a suitable compromise of highway functionality and landscape appearance.*' The western side of the road would retain low kerbing and timber bollards are proposed to retain the rural feel to the road as it enters the National Park.





As the above plan indicates the existing vehicular accesses are retained and WSCC is satisfied that sufficient visibility is provided at these access points. The provision of the footway helps to provide some separation between the properties and the road unlike the current situation (see below).



Lancing College has sought to liaise directly with the residents adjoining the above section to try and address concerns. As set out in the representation section these concerns relate to loss of parking, difficulties of access and impacts on delivery vehicles (other amenity concerns are dealt with later). The residents have enjoyed the use of

parking beyond their properties. However, this parking is on the adopted highway and the revised plans still allow for service vehicles to deliver without blocking the flow of traffic and space for other parking spaces. The College has also offered residents the ability to park in the Nursery car park at weekends.

The final section of road without frontage development returns to an even more rural character with a large proportion of the existing carriageway retained with no footway, no lighting and no kerbs.

Whilst considerable concern has been raised about highway safety issues and ease of access through the 'residential zone' the revised plans have been considered by an Independent Safety Auditor and are now supported by both Highway Authorities. A number of businesses have expressed concern about the issues of congestion on the new link road and that it might increase rat running (particularly after the Ikea Store has opened). On this latter point the recent announcement that Ikea will not proceed to build out the store has potentially addressed the rat running point but of course there is no certainty about who may purchase the Ikea land. Nevertheless, the rural nature of Coombes Road would deter most from using this as a route to any commercial uses at New Monks Farm or the airport.

It is not considered that the proposal would increase vehicle movements with existing movements being transferred from Coombes Road to the Fourth Arm. These movements vary depending on activities at the College and at different times of the year. However, the Highway Authorities have accepted the likely future vehicle movements as being 257 vehicles in the morning peak and 183 vehicles in the evening (equivalent to 4 vehicles in the am and 3 vehicles per minute pm). Outside of peak times the Road would be fairly lightly trafficked with an average of 1-2 vehicles per minute.

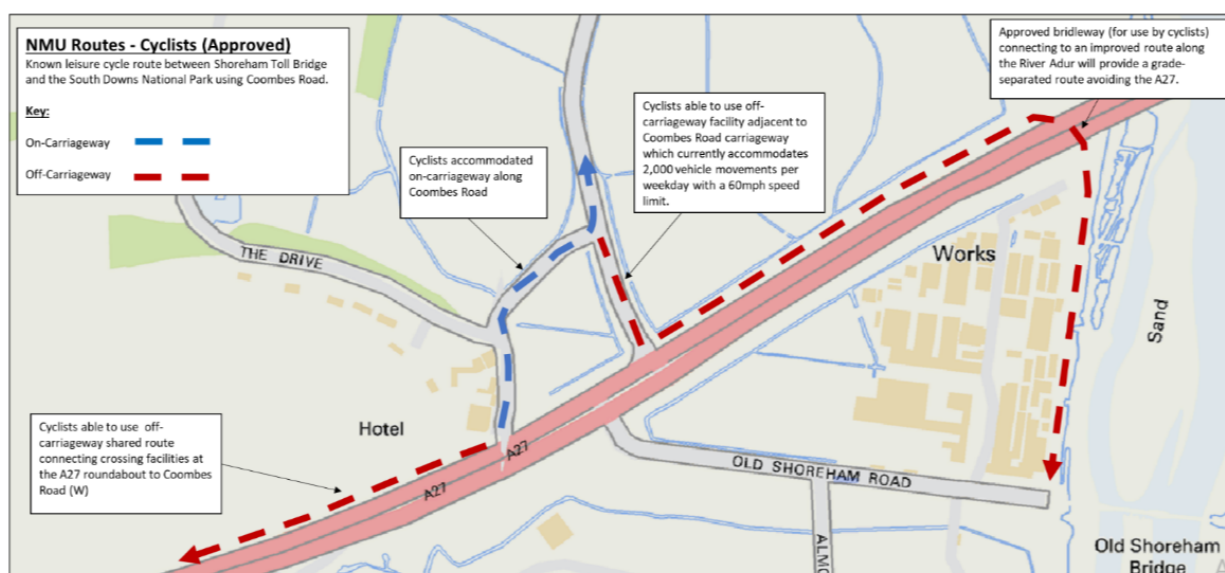
In terms of the issue of queueing traffic potentially affecting the pinch point in the new road this is extremely unlikely to happen. The new highway link has a length of approximately 330 metres which could accommodate 57 vehicles before it reaches Lancing Nursery providing more capacity than currently exists at Coombes Road (east). In addition, the observed delays and queues occasionally experienced at the current Coombes Road junction are linked with the long time cycle at the Sussex Pad lights which provides little green time to Coombes Road East. The new roundabout would have a much shorter cycle and the modelling shows no queueing or delays on the Fourth Arm. This has been reviewed by HE and WSCC who are in agreement with this conclusion.

### **Impact on Non Motorised Users**

This has been a controversial aspect of the original NMF development and these concerns have surfaced again in relation to the addition of the fourth arm. It is important to stress that the application develops further the measures already agreed in connection with the NMF development. A key element of the approved scheme is the

provision of a new NMU route away from the A27 from the Tollbridge under the A27 and along the north side of the A27 to Coombes Road. The current proposal enhances this route for cyclists and horse riders by removing the Coombes Road junction and the southern section of the road alongside the new bridlepath and removing traffic from this section of the road (other than access to a field gate). As indicated by the British Horse Society riders currently use the northern section of Coombes Road before accessing The Drive and bridleway (PRoW 2065) or Coombes Road (East) to access the Shoreham Toll Bridge both forming separate loop routes. These routes would be enhanced by the proposals.

The focus for most concern has been the changes to Coombes Road (west) and the potential conflicts between horses and cyclists travelling from the west. As approved cycle crossing points were provided across the new roundabout and a shared cycle path linked to Coombes Road (west). This is shown in the Highway Consultants revised Technical Note as follows:



In reviewing how best to deal with NMUs travelling from the west the applicants have followed Department for Transport's latest Local Transport Note 1/20 'Cycle Infrastructure Design' which specifically notes that cyclists should be treated as vehicles apart from where there are high volumes of motor traffic and high speeds which they should be physically separated from. The proposal for a shared cyclepath to the north of the new road closest to the A27 junction follows this advice. However, further along the new road away from the junction it has been agreed with WSCC that it would be more beneficial to allow cyclists to re-join the carriageway in a low-speed environment rather than continue off-carriageway along a route which would be interrupted by direct access points to the nursery and existing residential properties.

The reduced speeds resulting from the pinch point next to the residential properties will assist in avoiding conflicts between cyclists/horse riders and vehicles. Whilst this is not a route equestrians are expected to use very often - it will slow traffic down and vehicles can hang back from horses if necessary through the short narrower stretch

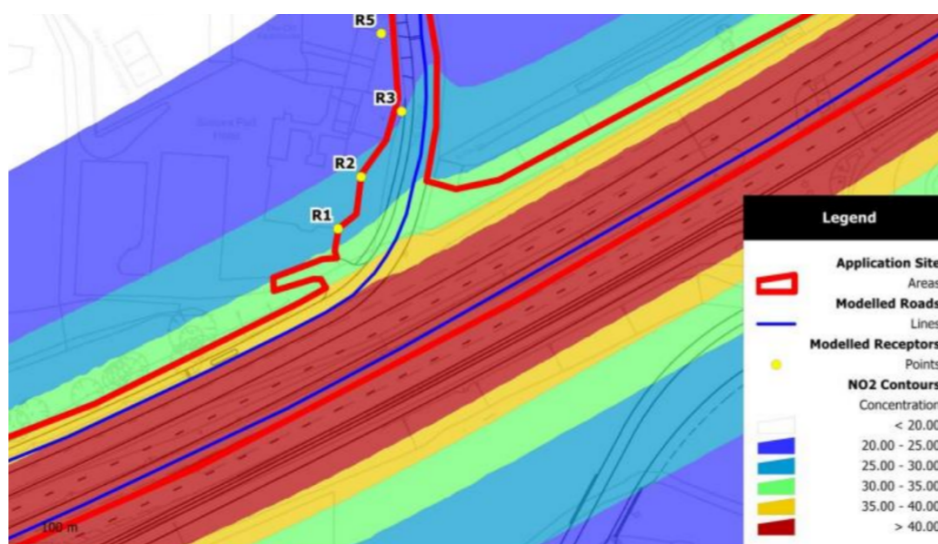
until they can safely pass. Given the lightly trafficked nature of the route, sufficient width to pass is likely to be available at all times in any event. Given the significant work that has been undertaken to address the requirements for a rural route it is considered that these proposals strike the right balance between achieving that aim whilst being functional and safe for all road users.

### Air Quality

There has been significant concern raised by AREA about the impact of increased pollution on the Nursery and residential properties as a result of turning the current cul-de-sac into a through road leading directly to the A27. The applicants Consultants have provided a rebuttal to AREA and it has responded to this in turn by seeking to justify its comments and quote conflict with WHO standards and the emerging Environment Bill which seek to reduce thresholds.

AREA accepts that NO<sub>2</sub> disperses quickly (as illustrated in the applicants modelling below) however it feels that PM<sub>10</sub> and PM<sub>2.5</sub> does not disperse in the same way and are far more serious to health. AREA stresses that,

*'Phlorum is relying on modelling for its predictions of PM<sub>10</sub> and PM<sub>2.5</sub>. In Parliament on February 3 Therese Villiers, in discussing the Environment Bill, stated that PM<sub>2.5</sub> is the most dangerous aspect of air pollution. She recommended that World Health Standards of 10µ/m<sup>3</sup> become a legally binding target, lowering the recommended UK target from 25µ/m<sup>3</sup>. The effects of PM<sub>2.5</sub> on the health of the children in the nursery and those living right beside the link road must not be dismissed.'*



sea salt trans boundary from European particulates, low levels from transport heavier and more affected by gravity

Phlorum the Air Quality Consultants for the application are to respond to AREA's further comments but make the point that the application has to be considered in light of

current Government guidance and not what may or may not be in emerging guidance or legislation. Whilst particulates can travel some distance they are also heavier than gas and therefore affected by gravity. As a result, distance from the road and measures such as the new planting between the A27 and the new road would help to mitigate particulates from the A27. Phlorum also points out that transport accounts for only a small proportion of overall particulates and levels can be affected by sea salt and particulates from Europe as a result NO<sub>2</sub> is the most significant pollutant from road traffic. Phlorum stands by its assessment therefore that,

*'It can, therefore, be concluded that the air quality assessment undertaken for the proposed development was appropriate and would "not result in pollution or hazards which prejudice the health and safety of the local community and the environment", as per Local Planning policy.'*

Given current advice there are no grounds to resist this application on air quality grounds particularly as one of arguments put forward by the application is the desire to reduce traffic movements in the vicinity of the site (and NO<sub>2</sub>) and the application is supported by the day nursery for this reason.

### **Impact on residential amenity**

Given that the only traffic currently affecting the existing residential properties in Coombes Road (west) is that associated with the day nursery, the objections from these properties to the proposal are fully appreciated. The increased traffic as a result of the proposal has prompted concerns about increased noise and vibration and these matters are addressed below.

#### *Noise*

The applicants have undertaken a comprehensive noise assessment the conclusions of which have been supported by the Environmental Health Manager. The key issue is that the existing properties already suffer from road noise and as a result the closer proximity of traffic albeit at lower speeds is unlikely to result in any negligible increase in noise. The noise change associated with the proposal would result in an increase of noise of between 0.1 - 2.9 (dB) which is assessed as being negligible.

As a result Environmental Health do not consider that any refusal based on increased noise could be substantiated. This is not to say that residents in their gardens would not hear a vehicle or a lorry pass by but the overall dB increase in total traffic noise considered over the day would only be negligible. Whilst, this is perhaps little comfort to residents, Members are aware that in considering loss of amenity there has to be an assessment about whether any loss of amenity is material. In this respect, the change in the access arrangements in front of these properties is significant given the current context and it is acknowledged that there will be some loss of amenity but not to the extent that a refusal of planning permission could be justified.

## *Vibration*

The applicants have undertaken a review of potential vibration effects on the nearest residential properties and have concluded that such issues are unlikely to occur particularly as traffic speeds are likely to be below 30 mph in the vicinity of the properties. Environmental Health have reviewed this assessment and agree that there are no concerns regarding any vibration effects from the proposal.

The revised design removing speed cushions and other traffic calming features (other than pinch points) has also helped to reduce any potential vibration effects to adjoining properties. The Highway Consultant has confirmed that surfacing other than potentially some granite setts marking character areas will be traditional smooth carriageway construction. An issue of maintenance has been raised but this section will remain as part of the adopted highway maintained by WSCC.

As indicated, the proposal will impact on properties adjacent to Coombes Road (west). The applicants have sought to address their concerns at the same time comply with guidance on rural roads in the National Park and address the needs of motorised and non motorised vehicles. The offer of parking for residents at the rear of the Day Nursery at weekends has been made by Lancing College but this would need to be a private agreement between the parties involved rather than a planning condition. Overall there will be a loss of general amenity for these properties but having regard to the wider benefits of the scheme and the lack of clear evidence to substantiate harm to amenity a refusal of planning permission could not be justified.

## ***Flooding and Drainage***

A number of local groups have raised concerns about flooding in the vicinity of the site and Members will be aware of flooding on the trunk road in recent winters. The applicants Drainage Consultants have worked with both with our Technical Services team and the Local Lead Flood Authority (LLFA) as well as Highways England to provide reassurance that the overall drainage solution for NMF will greatly assist alleviate some of these historic flooding issues on the A27 and that the proposed development would not increase flood risk.

The LLFA is satisfied that part of the problem has been the lack of maintenance of highway drains and the Community Stadium Ltd has been able to clear a number of blocked ditches adjacent to the A27. The applicants have agreed to the conditions recommended and the detailed agreements needed with Highways England (s278 under the Highways Act will also require full drainage details to be agreed.

## **Conclusion and Recommendation**

On balance it is considered that the proposed development would represent an enhancement of the access solution for the NMF development. Members have previously expressed concern about the lack of a fourth arm to serve Lancing College

and Coombes Road and this would significantly improve access arrangements for the College and other users of Coombes Road. As the College indicates the scheme as approved could seriously undermine the future financial viability of the College which is a key stakeholder in the National Park and contributor to the local economy.

There is some harm in terms of the impact on the National Park and properties in Coombes Road (west), however, the mitigation measures and design amendments have sought to address as far as possible these issues. The latest amendments to offer a large arable field to be converted to rich species grassland will provide significant biodiversity enhancements.

Members will be updated at the meeting with the latest comments from the National Park and one of the outstanding matters to be resolved is whether any planning permission should be subject to s106 agreement to secure the off site mitigation and enhancement measures. Discussions are also ongoing as to whether there is a need for a Deed of Variation to the original NMF s106 agreement to ensure that the various triggers seeking to restrict occupation of the new non-food store and the level of housing that could be occupied (249) prior to the opening of new A27 roundabout are linked to this revised design incorporating a fourth arm.

**Approve subject to comments from the SDNP and clarification regarding the need or otherwise for a legal agreement to link this permission with NMF and secure off site biodiversity enhancements.**

**Subject to conditions:-**

1. Standard Time Limit Condition
2. Amended Plans
3. No development shall commence until a scheme to deal with contamination of the site and /or controlled water has been submitted to and approved in writing by the Local Planning Authority (LPA). The scheme shall include a report compiled by a competent person which includes a desktop study, site walkover, production of a site conceptual model and a human health and environmental risk assessment.

**Reason:** In the interests of amenity and to protect the health and future occupiers of the site from any possible effects of land contamination in accordance with local and National policy.

4. If the Phase 1 report, as required under Condition 1, identifies potential contamination then no development shall commence until a Phase 2 intrusive report has been submitted to and approved in writing by the Local Planning



Authority, detailing all investigative works and sampling on site, together with the results of the analysis. The findings shall include a risk assessment for any identified contaminants in line with relevant guidance.

**Reason:** In the interests of amenity and to protect the health and future occupiers of the site from any possible effects of land contamination in accordance with local and National policy.

5. If the Phase 2 report identifies that site remediation is required then no development shall commence until a Remediation Scheme has been submitted to and approved in writing by the Local Planning Authority detailing how the remediation will be undertaken, what methods will be used and what is to be achieved and any ongoing monitoring shall be specified. A competent person shall be nominated by the developer to oversee the implementation of the Remediation Scheme. Thereafter the approved remediation scheme shall be fully implemented in accordance with the approved details

**Reason:** In the interests of amenity and to protect the health and future occupiers of the site from any possible effects of land contamination in accordance with local and National policy.

6. In the event that contamination not previously identified is found at any time when carrying out the approved development then no further development (unless otherwise agreed in writing by the Local Planning Authority), shall be carried out until a method statement identifying, assessing the risk and proposing remediation measures, together with a programme, shall be submitted to and approved in writing by the Local Planning Authority. The remediation measures shall be carried out as approved and in accordance with the approved programme.

**Reason:** To ensure that no unacceptable risks are caused to humans, controlled waters or the wider environment during and following the development works.

7. No drainage systems for the infiltration of surface water to the ground are permitted other than with the written consent of the Local Planning Authority. Any proposals for such systems must be supported by an assessment of the risks to controlled waters. The development shall be carried out in accordance with the approved details.

**Reason:** the previous use of the proposed development site as a historic landfill presents a medium risk of contamination that could be mobilised by surface water



infiltration from the proposed sustainable drainage systems (SuDS). This could pollute controlled waters.

8. No development approved by this permission shall commence, other than works of site survey and investigation, until full details of the proposed surface water drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The design should follow the hierarchy of preference for different types of surface water drainage disposal systems as set out in Approved Document H of the Building Regulations, and the recommendations of the Sustainable Urban Drainage scheme (SuDs) Manual produced by CIRIA. Winter groundwater monitoring to establish highest annual ground water levels will be required to support the design of any SuDS drainage. The carriageway shall not be brought into use until the approved works have been completed. The surface water drainage system shall be retained as approved thereafter. The surface water drainage system shall be maintained in good working order in perpetuity.

**Reason:** To ensure satisfactory surface water drainage.

9. The development hereby permitted shall not be brought into use until details of the management and maintenance of any parts of the drainage system which will not be adopted (including any ponds, ditches, swales, permeable paving and land drains) has been submitted to and approved in writing by the Local Planning Authority. The submitted details should specify the responsibilities of each party for the implementation of the Sustainable Urban Drainage scheme (SuDs), a timetable for implementation, provide a management plan and maintenance plan for the lifetime of the development which should include arrangements for adoption by any public authority or statutory undertaker and any other arrangement to secure the operation of the scheme throughout its lifetime. The management and maintenance arrangements shall be carried out in accordance with the approved details over the period specified.

**Reason:** To ensure the efficient maintenance and ongoing operation of the SuDS system and to ensure the best practice in line with the most up-to-date guidance.

10. No development approved by this permission shall commence until details have been submitted to and approved in writing by the Local Planning Authority for any proposals: to discharge flows to watercourses; or for the culverting, diversion, infilling or obstruction of any watercourse on or adjacent to the site. Any discharge to a watercourse must be at a rate no greater than the pre-development run-off values. No construction is permitted, which will restrict current and future land

owners from undertaking their riparian maintenance responsibilities in respect to any watercourse or culvert on or adjacent to the site.

11. No development hereby permitted shall be carried out until a phasing plan and programme of works which details how the Non Motorised User access(es) is to be maintained throughout the construction phase of the development, has been submitted to and agreed in writing by the local planning authority. The development shall be carried out in accordance with the approved details.

**Reason:** in the interests of highway safety.

12. No development shall take place, including any works of demolition, until a Construction Management Plan 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 construction period unless otherwise agreed in writing with the Local Planning Authority. The Construction Management Plan shall provide details as appropriate but not necessarily be restricted to the following matters:

- An indicative programme for carrying out the works;
- the anticipated number, frequency and types of vehicles used during construction;
- the method of access and routing of vehicles during construction;
- details of the parking of vehicles by site operatives and visitors;
- details of the location of site office and welfare facilities;
- details of the loading and unloading of plant, materials and waste;
- details of the provision of loading/offloading areas;
- details of the storage of plant and materials used in construction of the development;
- storage of chemicals and hazardous materials in line with best practice guidance;
- details of pollution control measures such as the use of petrol/water interceptors and temporary silt traps, to be used where appropriate to minimise the risk of polluted surface water runoff entering on site ditch habitats and the potential for loss site habitats;
- 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);
- measures to minimise the noise (and vibration) generated by the construction process to include hours of work, details of noise mitigation barriers, details of piling including details of the trial piles and recorded vibration impacts;

- details of floodlighting, including location, height, type and direction;
- damping down of dust sources and covering of loose materials to reduce dust disposition within adjacent habitats;
- general house-keeping including removal of litter;
- details of public engagement both prior to and during construction works.

**Reason:** To enable the Local Planning Authority to control the development in the interest of maintaining a safe and efficient highway network, in the interests of amenity, to conserve and enhance the landscape character and biodiversity of the area and to ensure no adverse impacts on designated sites and protected species.

13. No development hereby permitted shall commence until plans and particulars specifying the alignment, width, gradient and type of construction proposed for all footways and roads (including all relevant horizontal cross and longitudinal sections) have been submitted to and approved in writing by the Local Planning Authority. The details shall be informed by Roads in the South Downs and also include but not limited to:

- Anti-dazzle measures;
- Measures to avoid 'see-through' at the reordered junction of Coombes Road and The Drive;
- Bollards/street furniture;
- Signage;
- Retaining walls;
- Materials;
- Gateway feature.

**Reason:** In the interests of amenity and to conserve and enhance the landscape character.

14. The development hereby permitted (4th Arm of the New Monks Farm Roundabout) as shown on the Vectos drawing No. VN201557/PL-03 Rev J 'Proposed A27 Old Shoreham Road Improvements Development Access & Sussex Pad via Lancing College' (or other such scheme of works as approved by the Local Planning Authority who shall consult Highways England) shall not be brought into use until the Coombes Road junction with the A27 is stopped up to traffic, save for the passage and re-passage of pedestrians, cyclists and horse riders (permitted non-motorised road users).

**Reason:** To ensure that the A27 Trunk Road 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 and to satisfy the reasonable requirements of road safety.

15. Prior to the commencement of the development hereby permitted, full details of both hard and soft landscape works shall be submitted to and approved in writing by the Local Planning Authority (who shall consult with Highways England). Thereafter the construction and use of the development shall be in strict accordance with the approved scheme unless otherwise agreed in writing by the local planning authority (who shall consult Highways England)

These details shall include:

- a) Proposed planting plans including written specifications (including cultivation and other operations associated with plant and grass establishment and maintenance) ; schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate;
- b) details of tree pits;
- c) Finished levels and contours;
- d) fencing;
- e) Layout of surfaces including materials, permeability, kerbs, edges, steps, ramps

**Reason:** To ensure that the A27 Trunk Road 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 and to satisfy the reasonable requirements of road safety and to ensure a satisfactory development and in the interests of amenity and landscape character.

16. All hard and soft landscape works shall be carried out in accordance with the approved details.

All hard landscaping shall also be carried out in accordance with the approved details prior to the occupation of any part of the development or in accordance with a programme to be agreed in writing with the Local Planning Authority.

All soft landscaping comprising the approved details of landscaping shall be carried out in the first planting and seeding season following the first occupation of the building(s) or the completion of the development whichever is the sooner. All shrubs, trees and hedge planting shall be maintained free from weeds and shall be protected from damage by vermin and stock. Any trees or plants which, within a period of five years, die, are removed, or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species, unless otherwise agreed in writing by the Local Planning Authority.

**Reason:** To ensure a satisfactory development and in the interests of amenity and

landscape character.

17. The development hereby permitted shall not be brought into use until a landscape and ecological management plan (LEMP), including the management objectives and responsibilities and maintenance schedules for a minimum of five years for all the landscaped areas has been submitted to and approved in writing by the Local Planning Authority. The landscape and ecological management plan shall be carried out as approved unless as otherwise as approved by the Local Planning Authority.

The content of the LEMP shall include the following:

- a) description and evaluation of features to be managed;
- b) ecological trends and constraints on site that might influence management;
- c) aims and objectives of management;
- d) appropriate management options for achieving aims and objectives;
- e) prescriptions for management actions, together with a plan of management compartments;
- f) preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period);
- g) details of the body or organisation responsible for implementation of the plan;
- h) ongoing monitoring and remedial measures.

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved.

**Reason:** To ensure a satisfactory development and in the interests of amenity and landscape character and conserve and enhance the ecological standard. details.

18. Prior to the commencement of the development hereby permitted a full Arboricultural Method Statement shall be submitted to and approved in writing by the Local Planning Authority which shall include numbering and detailing trees, confirming root protection areas, routing of service trenches, overhead services and carriageway positions and any details of no dig techniques along with associated use of geotextiles and an indication of the methodology for necessary ground treatments to deal with compacted areas of soil. The works shall be carried out in accordance with Environmental Statement Chapter 10 Ecology and Nature Conservation.

**Reason:** In the interests of the amenity and the landscape character of the area.

19. Prior to the commencement of the development hereby permitted details of the protection of the trees to be retained shall be submitted to and approved in writing by the Local Planning Authority. The measures of protection should be in accordance with BS5837:2012 and shall be retained until the completion of the development and no vehicles, plant or materials shall be driven or placed within the Root Protection zones.

**Reason:** In the interests of the amenity and the landscape character of the area.

20. All planting shall be completed in accordance with standard arboricultural practices. In the event that any such trees die or become seriously damaged or diseased within a period of five years following planting they shall be replaced in the next planting season with others of a similar size and species.

**Reason:** In the interests of the amenity and the landscape character of the area in accordance with Development and Management Policy SD11

21. No part of the development hereby permitted shall be brought into use until a lighting framework has been submitted to and approved in writing by the local planning authority (who shall consult with Highways England). This information shall include a layout plan with beam orientation and schedule of equipment proposed in the design (luminaire type, mounting height, aiming angles and luminaire profiles) and details of the impact of lighting on driver safety on the A27. The lighting shall be installed, maintained and operated in accordance with the approved details unless otherwise agreed with the Local Planning Authority.

**Reason:** to ensure that any proposed lighting will not have an adverse impact on driver safety on the A27 Trunk Road and that the A27 Trunk Road 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 and to satisfy the reasonable requirements of road safety, and to enable the Local Planning Authority to control the development in detail in the interests of night time amenity, tranquillity and protect and conserve the International Dark Night Skies.

22. Prior to commencement of development, an updated survey for badgers should be undertaken to ensure that no new sets are present and the findings of the survey and any additional mitigation measures proposed submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be undertaken in accordance with any additional mitigation measures approved.

**Reason:** To identify and ensure the survival and protection of important species

#### Advice to the Applicant/informatives

##### From the Environment Agency:

Dewatering activities from excavations. We note that this proposal may involve temporary discharges of uncontaminated water from excavations to surface water. This activity may require an environmental permit(s) from us.

We have a Regulatory Position Statement on this activity and the Applicant should refer to this for further guidance –

<https://www.gov.uk/government/publications/temporary-dewatering-from-excavations-to-surface-water/temporary-dewatering-from-excavations-to-surface-water>.

For enquiries about permits, the Applicant is advised to contact our National Customer Contact Centre on 03708 506 506

##### Highways:

Works within the Highway – Implementation Team The applicant is required to obtain all appropriate consents from West Sussex County Council, as Highway Authority, to cover the off-site highway works. The applicant is requested to contact The Implementation Team Leader (01243 642105) to commence this process. The applicant is advised that it is an offence to undertake any works within the highway prior to the agreement being in place.

##### Contaminated Land:

Ensure that the Phase 1 report is carried out in accordance with national guidance as set out in DEFRA and the Environment Agency's Model Procedures for the Management of Land Contamination CLR11.

Ensure that the Phase 2 report is in accordance with current BS references within the Code of Practice for Investigation of Potentially Contaminated Sites.

Ensure that the report is undertaken in accordance with national guidance as set out in DEFRA and the Environment Agency's Model Procedures for the Management of Land

Contamination CLR11.

Guidance on Lighting

Guidance on appropriate lighting in the South Downs National Park can be found in the SDNPA Lighting Guidance, which is available online.

19th July 2021

**Local Government Act 1972**

**Background Papers:**

As referred to in individual application reports

**Contact Officers:**

James Appleton  
Head of Planning & Development  
Portland House  
01903 221333  
[james.appleton@adur-worthing.gov.uk](mailto:james.appleton@adur-worthing.gov.uk)



## **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.

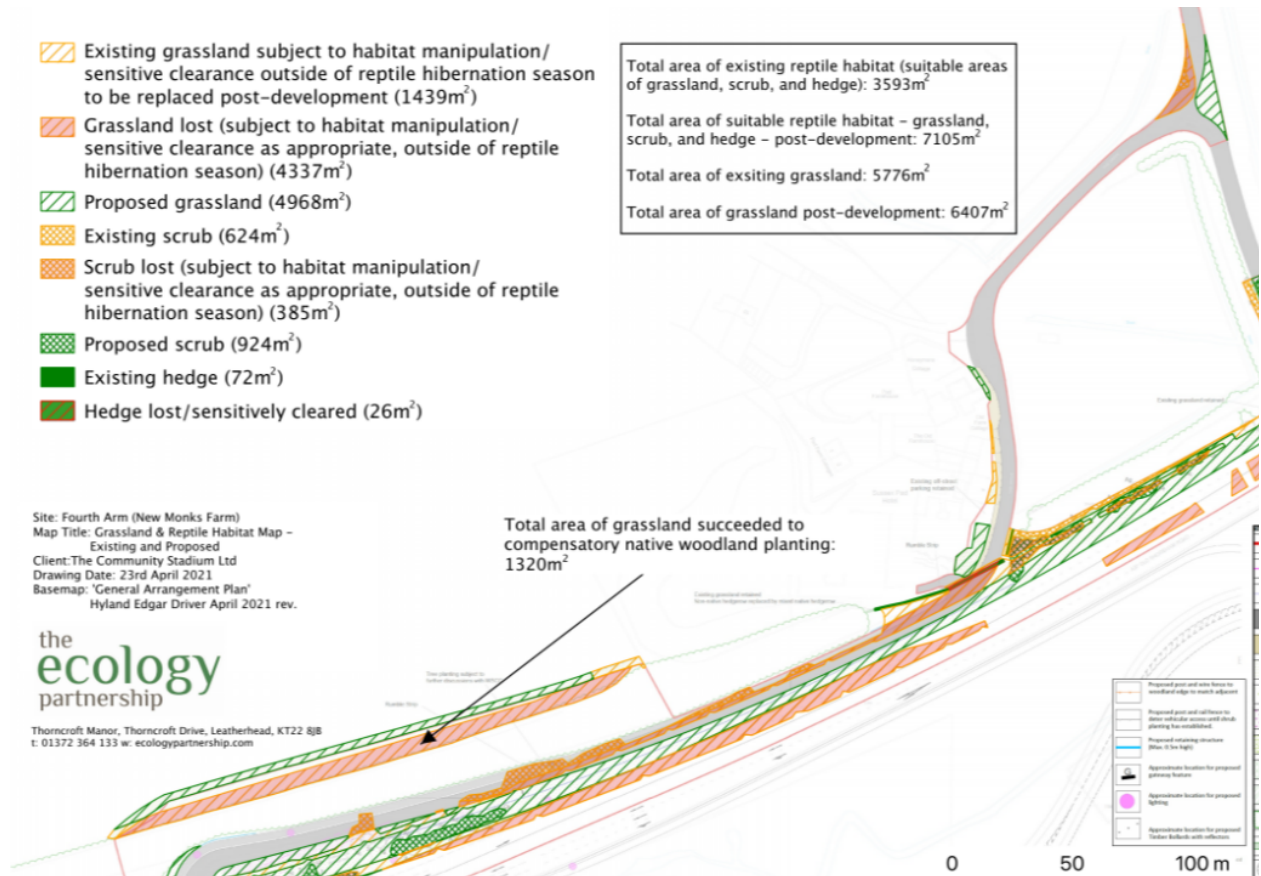
## **14.0 Financial implications**

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.

## NMF Masterplan



## Landscape and Ecological Enhancements



# Adur District Council Planning Committee



New Monks Farm Roundabout

Addition of a 4th Arm  
serving relocated Coombs Road  
AWDM/1906/2021

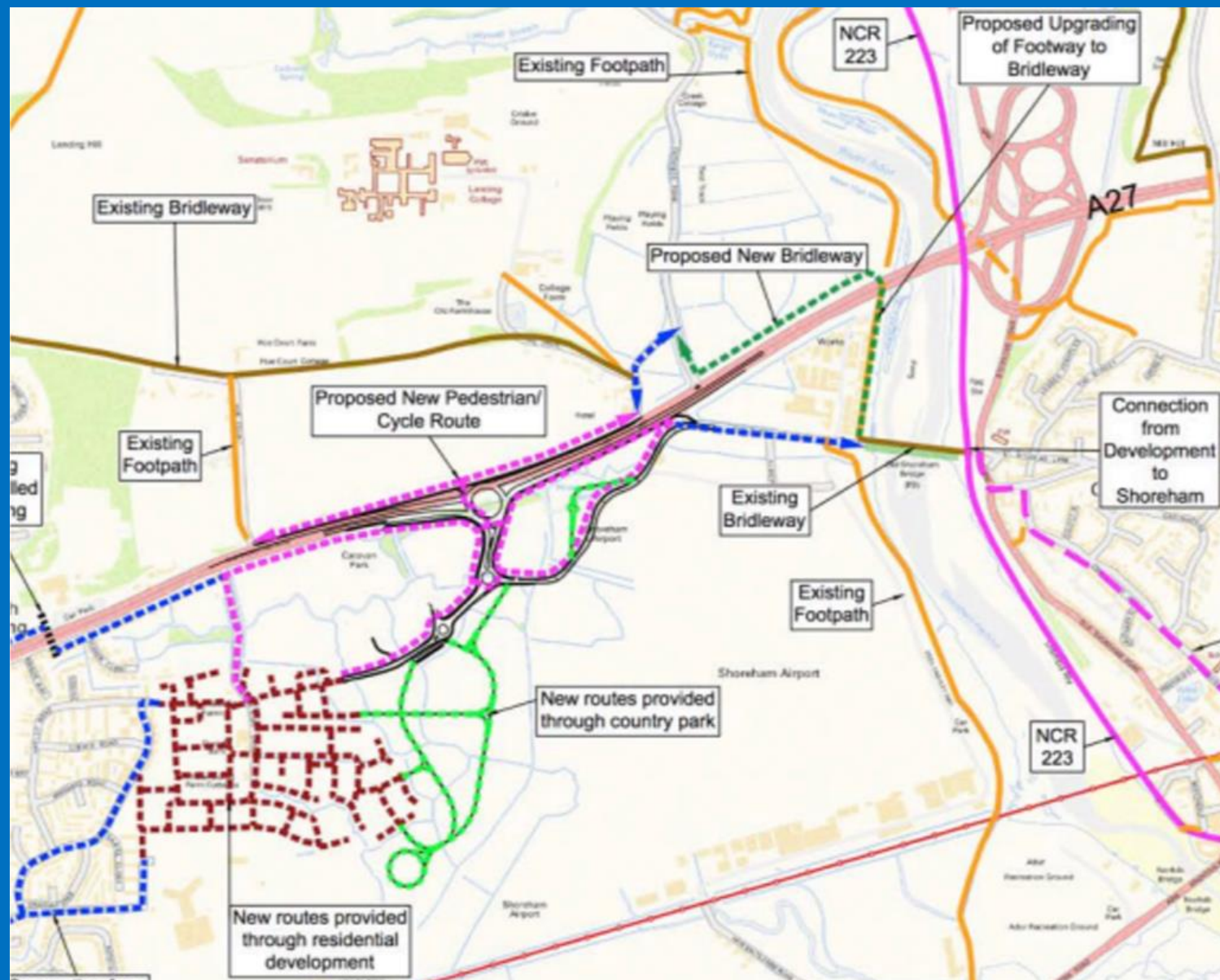
## Development Description - AWDM/1906/2021

Highway works comprising; (1) construction of a highway (a Fourth Arm) from the approved New Monks Farm A27 roundabout to Coombes Road (west) along with associated hard and soft landscaping, and; (2) closure of the existing Coombes Road (east) junction with the A27 and its replacement with landscaping. The application is accompanied by an Environmental Statement.



# Context - New Monks Farm Strategic Land Allocation









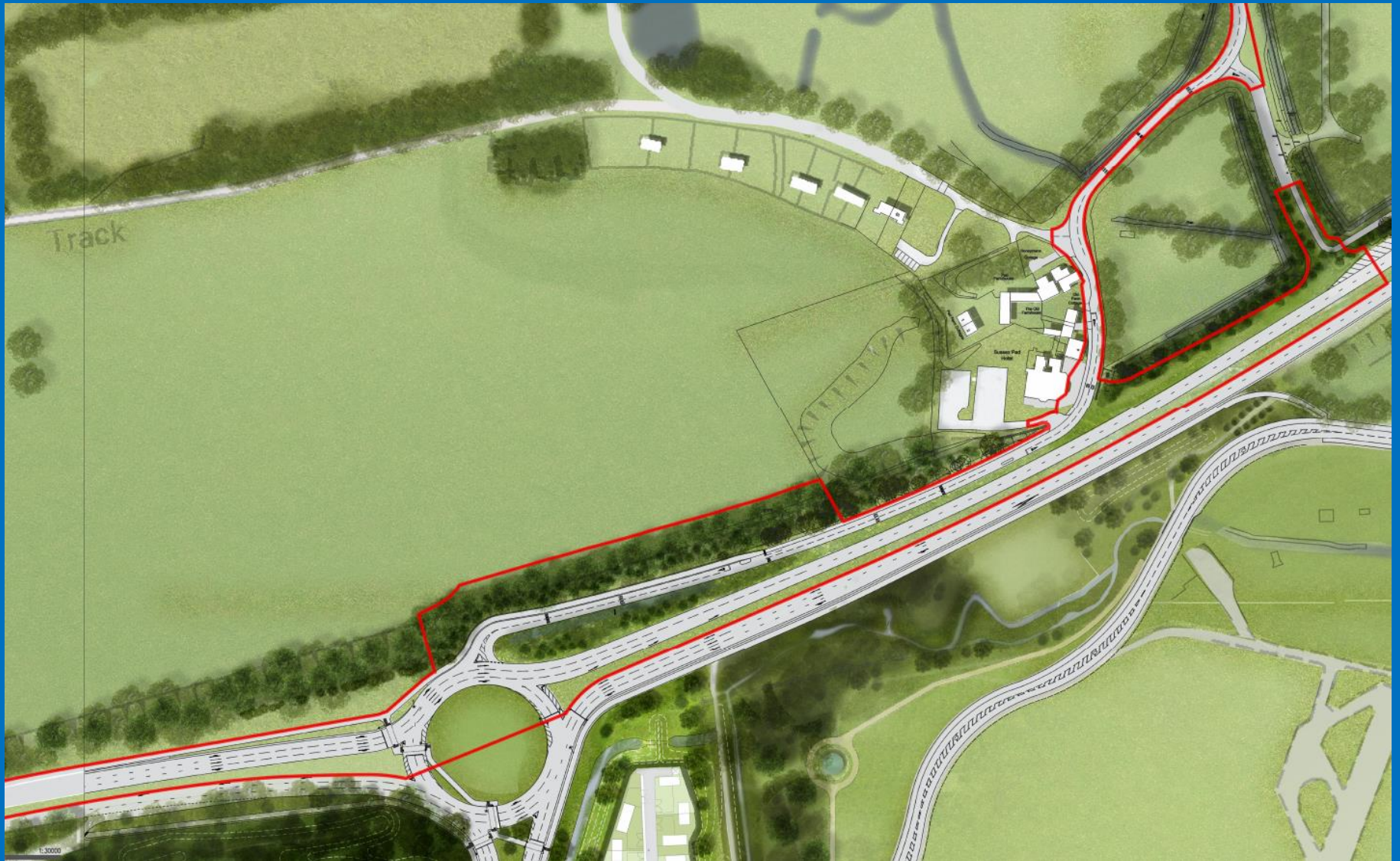
During the Consultation Period for the New Monks Farm Planning Application The Community Stadium Ltd (the Applicant) gave an undertaking to Members of the Adur Planning Committee that they would work with Lancing College to deliver a Fourth Arm connection from the A27 Roundabout to Coombes Road'

This new access would facilitate access to Lancing College by removing the need for west bound traffic to route via the A283 Shoreham Bypass; a diversion of approximately 2.6 km.

This application involves a small section of land within Adur and the majority lies within the South Downs National Park (SDNP).

The application is scheduled to go to Adur Planning Committee on the 19th July and the National Park Committee on the 12th August 2021



















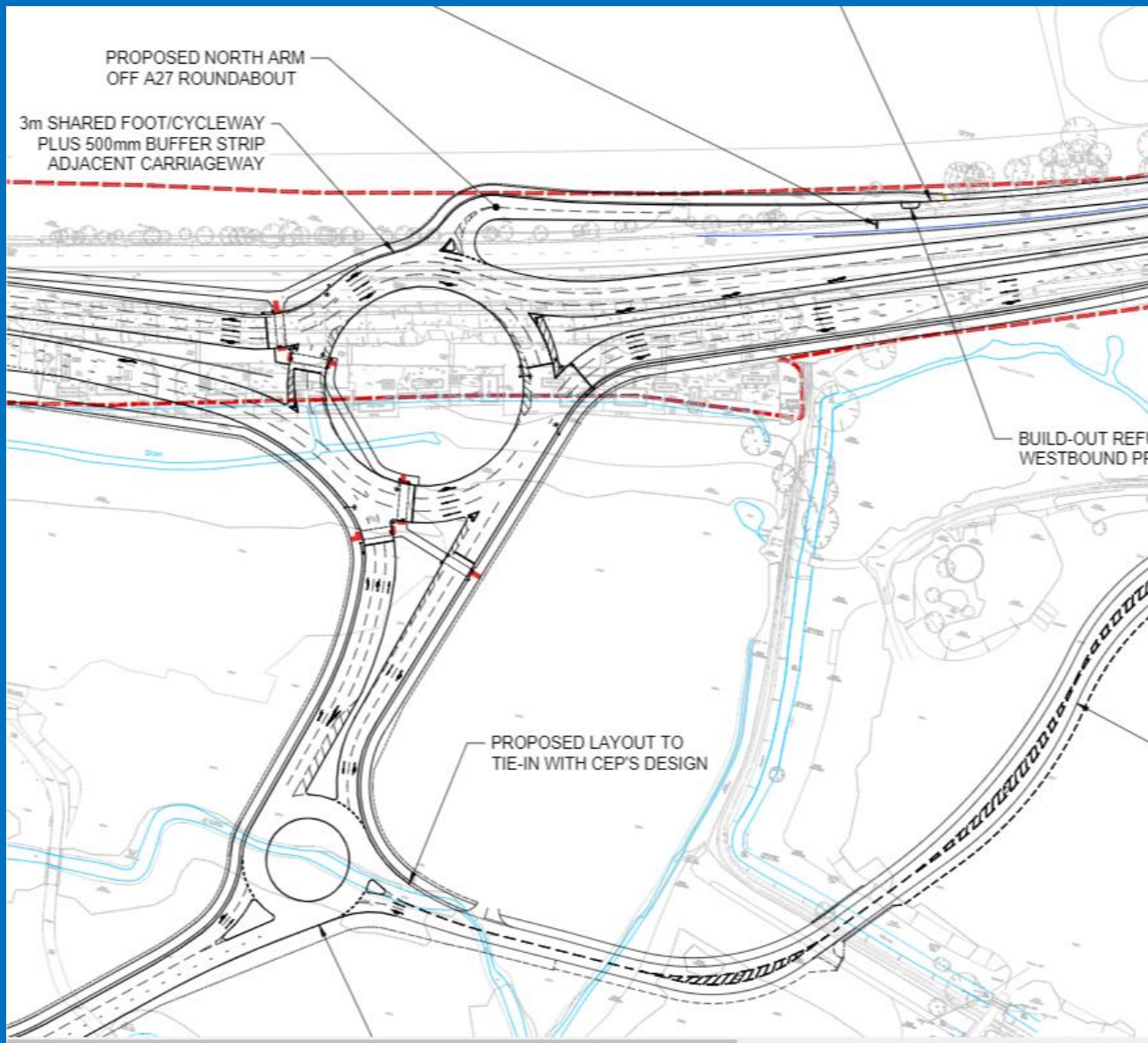














# Amended Plans addressing Highway and Resident Concerns

- Removal of speed cushions, 'SLOW' markings and red coloured surfacing
- Removal of build out near the Nursery access
- Removal of the white centre line for the majority of the route (other than in proximity to the junctions)
- Route to be unlit other than to the section closest to western A27 roundabout as required by HE
- Introduction of granite setts to Nursery entrance and build out along straight length of road (with addition of a further tree subject to discussion with WCC)
- Introduction of tree planting to Swale to aid moisture retention
- Relocation of timber gateway features
- Reduction in kerb height alongside Coombes Road (West) properties (low aggregate kerb) and use of buff colour to footpath
- Introduction of timber bollards adjacent to housing and at north-eastern corner
- Replacement of non-native hedge with native hedge
- Introduction of rough grassland planting along northern boundary
- Additional broad leaf native tree planting
- Provision of a temporary post and rail fence on Coombes Road East to control access until new planting becomes established.

