



Campaign to Protect
Rural England, Sussex Branch CIO
Brownings Farm, Blackboys,
East Sussex, TN22 5HG
Tel 01825 890975
e-mail info@cpresussex.org.uk
www.cpresussex.org.uk

Rt Hon James Brokenshire MP
Secretary of State for Housing, Communities and Local Government
By email: james.brokenshire@communities.gsi.gov.uk
Copy to the National Planning Casework Unit
By email: PCU@communities.gsi.gov.uk

12th October 2018

Dear Mr. Brokenshire,

Request to the Secretary of State to “call in” two applications for major development at Adur, West Sussex, under section 77 of the Town and Country Planning Act 1990.

Application ref: AWDM/0961/17, Land West of New Monks Farm, Mash Barn Lane, Lancing West Sussex (New Monks Farm) and application ref: AWDM/1093/17, Land at Shoreham Airport, Cecil Pashley Way, West Sussex (Shoreham Airport)

I am writing on behalf of CPRE Sussex, the countryside charity, to seek the Ministerial “call in” of the two planning applications listed above for major development in Adur District which were approved, subject to a referral for call in, by Adur District Council on 3rd October.

We believe that the two applications should be considered in combination due to cumulative impacts (such as flooding, drainage, highways landscape) and the fact that access and drainage plans are shared.

These applications have prompted considerable local debate and public concern, particularly in terms of the impact on the strategic gap between Lancing and Shoreham; flood risk; the A27 trunk road; and the local landscape and heritage. It has been well documented that these applications will cause harm to the setting of the National Park and the South Downs National Park Authority has outstanding objections to both applications.

We have considered the following documents in making this request for call in;

- The National Planning Policy Framework (2018)
- The National Planning Practice Guidance (2014 and as updated): particularly “Determining a planning application” (paragraph 014)
- Ministerial policy on call in applications made to Parliament on October 26th 2012
- Adur District Local Plan 2017

The evidence base put forward for the Adur Local Plan examination in 2017 supported the development of 600 homes and 10,000 m2 floorpace for commercial use at Land West of New Monks Farm (New Monks Farm or NMF) and 15,000 m2 floorspace for commercial use at Shoreham Airport. During the local plan examination, the Inspector agreed that these figures should be reflected as a minimum “to ensure that the most effective use of land is achieved” **with the caveat that “there is no reason to conclude that the floorspace figure would be significantly exceeded”** with a planning application following the adoption of the Local Plan. However, applications AWDM 0961/17 and AWDM /1093/17 are materially different and do ‘**significantly exceed**’ the floorspace figures first proposed in the Local Plan.

The planning application for AWDM/0961/17: New Monks Farm includes a large IKEA which is 35,900 m2, significantly larger than the evidence submitted to the Inspector. The airport allocation for 15,000m2 commercial use is significantly exceeded by the application AWDM/1093/17 which proposes 25,000m2. It is our belief that the extent of floorspace proposed and associated impacts in terms of landscape, reduction of the Green Gap and the reduction of the proposed country park are in conflict with Policy 5, Policy 7 and Policy 14 of the adopted Adur Local Plan.

The officer’s report in relation to the New Monks Farm development states that the huge IKEA is necessary to ensure the viability of the development, an issue which the Local Plan Whole Viability Assessment failed to identify. However, there is no hard evidence that a different type of ‘high skilled’ employment offer, with less negative impacts and infrastructure costs than an enormous retail outlet could not be realised. The viability issue also puts other proposed benefits of the scheme, such as the delivery of the school and the affordable homes - particularly the affordable rented homes needed by the District, into question. We are concerned that the airport application threatens to undermine the effective functioning of Shoreham Airport by restricting taxiing and wing clearance areas and flight safety zones.

We believe that a Ministerial call in and examination of both applications together in a public inquiry, prior to decision is justified because the applications conflict with national policies on important matters, have significant effects beyond their immediate locality, and give rise to substantial cross-boundary or national controversy.

1. Conflict with national policies

Landscape impacts and the South Downs National Park

The South Downs National Park Authority objected to the New Monks Farm application (dated 12 March 2017 and again 5th July) due to the major harm it would have on the character of the park and in views to it. Since this time, the applicant has resubmitted plans for the development, however in its final response the Park states that

*“Thank you for informing us of the further information submitted in respect of the above application, which includes further plans detailing the louvres and the extent of the green roof. The SDNPA consider that these additional plans do not address the concerns previously raised in our comments dated 12 March and 05 July 2018, which detail the significant harm it is considered would be caused by the proposed development. **The SDNPA therefore maintains its objection to the proposal.**”*

We believe that these applications will cause harm to a nationally protected landscape and that the Local Planning Authority is contravening Section 11A(2) of the National Parks and Access to the Countryside Act 1949, section 85 of the Countryside and Rights of Way Act 2000. The National Planning Policy Framework (NPF) affords National Parks and Areas of Outstanding Natural Beauty the ‘highest protection’ in terms of landscape and scenic beauty. There is no compatibility between the visual prominence requested by IKEA and the need to protect the ‘beauty’ of the National Park.

Heritage Impacts

Historic England has raised concerns in relation to the Shoreham Airport application about **the “harm that this proposal would cause to the significance of designated heritage assets by virtue of the contribution made to this by their settings.”**

The **West Sussex County Council Archaeologist** considers that *“the harm to the setting of the highly graded designated heritage assets Old Shoreham Bridge and the Lancing College complex, as they are viewed and experienced from the open riverside environment, would be substantial. I recommend that on these grounds the application should be refused.”*

Biodiversity and Protected Species

In relation to Shoreham Airport, Natural England has stated that there is currently insufficient information for determination at the present time and that *“from the information submitted to date, we are concerned that at this stage of the application process, insufficient consideration has been given to mitigating impacts on the setting of the South Downs National Park (SDNP) and Adur Estuary Site of Special Scientific Interest (SSSI). Although we recognise that this is an outline application, our advice is that the Council defer determination of the proposal until [the following] additional information is submitted from the applicant”* **The LPA has approved the application against this advice.**

The Sussex Wildlife Trust have raised concerns in both their response to New Monks Farm and the Shoreham Airport applications, they do not feel the applicant has considered fully the impact on the Adur Estuary SSSI.

We do not believe that the council is compliant with section 40 of the NERC Act 2006 and that there is therefore a conflict with national policies in relation to protected species.

2. Significant effects beyond the immediate locality

Highways

The site adjoins the A27 trunk road which already carries around 60,000 vehicles per day in this area, about two-thirds of which is local traffic and one-third through traffic along the south coast. The addition of a set of large scale traffic generators on the application sites – particularly the proposed IKEA - will add considerably to traffic on the A27.

Access to the South Downs National Park for Non Motorised Users (NMU)

The West Sussex Local Access Forum objects to the proposals for replacement of the Sussex Pad crossing citing *“serious concerns as to its suitability for all NMUs (walkers, cyclists and equestrians), as it fails to meet current standards for a bridleway regarding height (minimum 3.4m) and width (minimum 3m, preferably 4m for a well-used path).”*

Attached to their letter dated 4th July 2018, a consortium of local organisations represented by Brighton and Hove Friends of the Earth have submitted a report by ActivePlanning and City Infinity which shows that the *“removal of the existing pedestrian and cycle crossing at the site known as Sussex Pad and its replacement with inadequate and diversionary alternatives is contrary to Local Plan policies 5 [which requires provision of ‘sustainable transport infrastructure’ including **improved** cycle, pedestrian and equestrian links to Lancing, Shoreham-by-sea and the South Downs National Park] and Policy 28 [which seeks to ‘encourage’ developers to extend the existing cycle network and secure a network of cycle, pedestrian and bridleway facilities linking urban areas, key sites, open space, countryside and coast... as well as **improved** access across the A27’]*

The Government has provided two statutory purposes for National Parks in England. All public bodies, when undertaking any activity which may have an impact on the designated area, have a duty to have regard to these purposes. **One of these purposes is to ‘promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.’ Inadequate plans for the Sussex Pad Junction conflict with this purpose.**

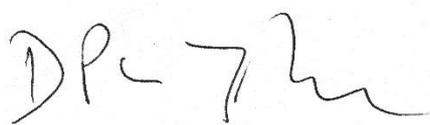
Flooding

There are concerns about the foul waste scheme and proposals for drainage and the impact this will have in terms of flood risk for the wider area, particularly in terms of the impacts of climate change (increased risk of significant weather events and sea level rise.)

3. Give rise to substantial cross boundary and national controversy

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

Yours faithfully



**David Johnson,
Chair, CPRE Sussex**