

NEW MONKS FARM DEVELOPMENT THE PLANNING DECISION



This document is supported by

Area Residents Environmental Action, Shoreham Society, Lancing Manor SE Residents Network, West Beach Residents Association, Campaign to Protect Rural England Sussex, Sussex Wildlife Trust, Beachcroft Place Residents Association, Friends of the Earth Brighton & Hove, Adur Floodwatch Group & Withy Patchy Community

Our New Neighbour??

Ikea has a group sustainability strategy for 2020 entitled PEOPLE AND PLANT POSITIVE. Part of their strategy is: "Take the lead in creating a better life for the people and communities impacted by our business. Further extend our code of conduct throughout our value chain; **be good neighbours/ support human rights/ act in the best interest of children.**"

- Ikea will create an additional 2 million annual traffic movements,
- Increase pollution and be an intrusion (eyesore) when viewed from the South Downs National Park and Lancing College.
- Ikea will be complicit in endorsing the relocation of the Withy Patch Community to a site surrounded on 3 sides by roads subjecting them to a lifetime of increased noise and air pollution.
- Siting of the proposed school playing field backing onto the heavily polluted location next to the A27.

Will this create a better life for Adur communities?



Outline planning permission is for a non- food retail store 32,000sqm

Local Plan Policy 5 Page 29 **states a minimum of 10,000sqm of appropriate employment- generating floorspace.** The Inspector's comments (appendix 2 page 226. 57) state 'This more flexible approach is justified in order to ensure that the most effective use of land is achieved and therefore MM8 recommended. In terms of the commercial floorspace **the introduction of a degree of flexibility into the policy** will enable consideration of all the elements of any proposal to be undertaken in a comprehensive way, taking into account issues of viability'. The Inspector continued, '**There is no reason to conclude that the floorspace figure would be significantly exceeded** because policy 5 still requires the provision of a country park (at least 28ha), the implementation of a landscape strategy and the provision of green infrastructure'.

Refusal: OVERDEVELOPMENT

In terms of design, height, form, scale and massing, the development would result in an overdevelopment of the site and would create an **unacceptable relationship with the South Downs National Park and Lancing College.** It will adversely impact on the character and amenities of the area. In terms of scale and massing, **it is over 3 times the size agreed by the Inspector.** Regarding design it is a rather standard industrial building with no architectural merit. It will cause **significant harm to the landscape, character, views and dark sky reserve.**

IKEA – impacts of size & scale are serious planning considerations

The planning application decision was deferred pending more work by the applicant to address the impact of the proposed, massive 'shed' of an IKEA. This was particularly for damage to views out of and into the National Park and the further problem of detriment to the dark skies aims of the Park because it will push light pollution even further into the Park with the lighting for the proposed 1,000 vehicle carpark.

Below are further mitigations with the proposed louvres applied to the northern elevation.

IKEA without any louvre treatment



IKEA with the louvres as submitted in the latest plans



It's hard to see the improvement!

Realistically, no matter what is done to lessen the visual impact of this massive building, no treatment will ever be sufficiently effective to nullify its visual impact, not only on the National Park but upon the local area of Lancing and the Adur District.

May we remind you of a recent refusal of an application for nine dwellings at 20, Firle Road, Lancing backing onto the National Park. This was refused in July because it failed to comply with the Local Plan and National Planning Guidance.

Decision: REFUSE

July 2018 – 20 Firle Road, Lancing AWD/1942/17

01) The proposed development by virtue of its scale, siting and design would fail to reflect the prevailing character of the area and would have an overbearing impact upon the local environment and the amenities of neighbouring properties. The proposal therefore conflicts with the National Planning Policy Framework, advice within the Planning Practice Guidance and policy 15 of the Adur Local Plan 2017.

02) The Local Planning Authority has acted positively and proactively in determining this application by identifying matters of concern with the proposal and discussing those with the Applicant. However, the issues are so fundamental to the proposal that it has not been possible to negotiate a satisfactory way forward and due to the harm which has been clearly identified within the reason(s) for the refusal, approval has not been possible

If this development for just nine detached houses can be refused on these grounds, there should be absolutely no debate that this IKEA proposal for New Monks Farm should be refused outright for precisely the same reasons.

The IKEA proposal surely fails to comply with Policies 5 and 15 of the Adur Local Plan 2017.

Adur Plan Part 2 – Policy 5 – page 30

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.**

Adur Plan Part 4 – Policy 15 – page 65

Policy 15: Quality of the Built Environment and Public Realm Development should be of a high architectural quality and respect and enhance the character of the site, and the prevailing character of the area, in terms of proportion, form, context, massing, siting, layout, density, height, size, scale, materials, detailed design features and landscaping.

Development should:

- Enhance the local environment by way of its appearance and character, with particular attention being paid to the architectural form, height, materials, density, scale, orientation, landscaping and layout of the development;
- Include a layout and design which take account of the potential users of the site;
- Incorporate the principles of securing safety and reducing crime through design in order to create a safe and secure environment;
- Make a positive contribution to the sense of place, local character and distinctiveness of an area; not have an unacceptable impact on adjacent properties, particularly residential dwellings, including unacceptable loss of privacy, daylight/sunlight, outlook or open amenity space;
- Respect the existing natural features of the site, including land form, etc.

National Planning Policy Guidance

NPPG 115. Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty etc.

The massive IKEA is out of keeping with the local area



New Monks Farm impact on Shoreham Airport

The consultant, York Aviation, has produced a report which has identified that the helicopter flight paths need relocation to avoid noise and safety impacts on the residential / IKEA / school areas of the NMF development.

One of the helicopter operators stated that the airport management company has had some dialogue on revised flight paths, but nothing so far has been finalised. His concerns were that a 100 yards realignment of those flight paths will not solve the problem for noise over built up areas or safe drop-down space.

New helicopter flight paths should be submitted with 100% agreement with all the rotary and fixed wing operators at the airport before the committee decides on the application for New Monks Farm.

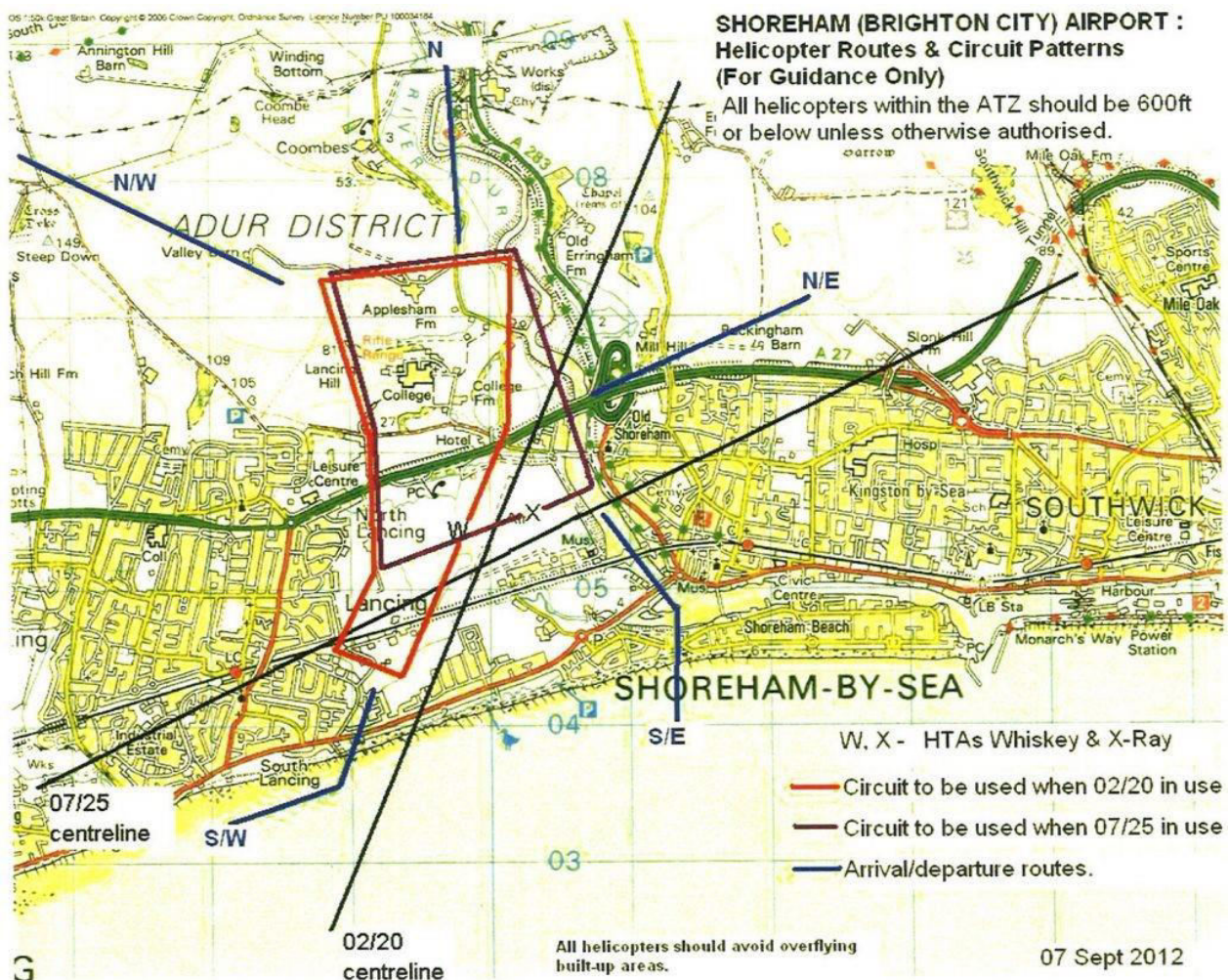
Adur Local Plan Policy 7 page 38

Any new development at the airport must not jeopardise the runway use or airport operations.

NPPF 2018

Para 53 Planning conditions should be kept to a minimum and only imposed where they are necessary

This is a serious noise and public safety issue which must not be subject to a condition after approval.



CLEAN AIR IS ESSENTIAL FOR LIFE

(Air quality and Emissions Mitigation Guidance for Sussex)

Air pollution causes 40,000 premature deaths a year and contributes to:

DEMENTIA ASTHMA HEART DISEASE RESPIRATORY PROBLEMS DIABETES
DECREASES IN ALL ATTENTION PROCESSES IN CHILDREN
POOR LUNG DEVELOPMENT

Increasing traffic leads to increasing air pollution.

Traffic on the A27 has been rising by approximately 2,000 – 3,000 vehicles per year. Traffic from IKEA, airport development and housing will add at least 8,000 vehicles daily.

- **Nitrogen dioxide NO₂ levels** - 14 out of 22 diffusion tube readings throughout Adur for NO₂ were **higher** in 2017 than in 2016.
- **AREA NO₂** readings in April 2017 on the Lancing stretch of A27 were as high as 54.2µ/m³ at site of proposed new roundabout and 48.86µ/m³ at the Manor roundabout;
- **Adur Council readings for NO₂ on the same day** on the same stretch of the A27 were 25µ/m³ and 35µ/m³, quite a bit lower than AREA readings
- **Air-Defra** On Saturday 08/09/18 **NO₂** hourly mean reading for Worthing was **32µ/m³**. Readings from 145 other cities placed **only 22 higher than Worthing's** level and 123 below. Significantly, cities such as Reading, Southampton A23, Bristol Temple Way and Newcastle Centre had lower readings.
- **AQMA Shoreham High St** – April 2017 - AREA NO₂ readings averaged 43.43µ/m³, with one as high as 53.32µ/m³; **Adur's** averaged 35.6µ/m³.
- These comparisons used **raw data**, using the same type of diffusion tube and same analyst, Gradko. AREA tubes were placed at a height of 2 metres and Adur's were at a height of 3 metres, well above breathing level.
- **Worthing – Grove Lodge Cottages** – NO₂ annual mean in 2017 was up to 68.2µ/m³, an increase of 4.1µ/m³ from 2016.
- **The legal EU limit for NO₂** is 40µ/m³, annual mean objective.

Particulate Matter – extremely small particles of dust, soot, tyre wear, liquid droplets with a chemical makeup which get into the heart and lungs, especially PM_{2.5}

PM₁₀ and PM_{2.5} readings

- Shoreham AQMA – no readings
- **Air Defra** - PM_{2.5} Grove Lodge – on Thursday, March 1, 2018 average readings were 32µ/m³. Peak was 40µ/m³.
- UK annual mean objective is 25µ/m³.
- WHO guideline is 10µ/m³ annual mean for PM_{2.5} and 20µ/m³ annual mean for PM₁₀.

laqm.defra.gov.uk There is no known safe level for particulate matter. Negative health impacts have been found well below current EU and UK levels.

WORTHING AND ADUR COUNCIL 2018 LAQM REPORT Plans for improving traffic flow and air quality include many soft measures such as car clubs, promoting cycling and walking, electric vehicle charge points and cut engine pollution signs. These measures offer only **low reduction** in emissions, funding is in short supply and progress has been slow. In reality, they will do little to counteract the negative traffic and pollution impacts from IKEA. Balancing the demand for development with the need to improve air quality will bring challenges. Whilst the soft measures will “help to contribute towards compliance, WBC anticipates that further measures not yet prescribed will be required in subsequent years to achieve compliance and revocation of WBC AQMA number 2.”

New Monks Farm will lead to **a decrease in air quality** even with the road improvements. You cannot mitigate for a daily increase of at least 8,000 cars, lorries and delivery vehicles.

- The new **Withy Patch travellers’ site** will be surrounded by traffic and increased air pollution on 3 sides, unscreened by trees as they are at present. Traffic will be queuing at the new roundabout on the A27 and quite likely at the roundabouts on the slip roads. There will be an increasing harmful effect from noise and air pollution for these residents and other residents near the Manor roundabout. Closer proximity to the road means higher exposure to pollution.

UK Parliamentary Inquiry on Air Pollution <https://www.parliament.ukinquiries>

- Economic effects on health of poor air quality cost between £16 and £20 billion pounds a year.
- **Car users may be exposed to air pollution levels 10 times higher in the car than outside.**
- 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 negative effects on the occupants of cars not only on the A27 but also the other local roads where traffic will increase are not acknowledged; the negative effects on the residents of the new Withy Patch site, both during the construction phase with the **HIGH** level of dust and during their time of occupancy, are not acknowledged

Adur Council should not be endorsing a plan which will lead to greater congestion and greater air pollution for its residents and local commuters on roads where **pollution levels have been RISING**. The costs to health and to the NHS are of utmost importance and should not be ignored. There may be monetary gain to the Council in the short term, but the costly health effects will be felt long after.

DOES NOT COMPLY WITH THE FOLLOWING CONDITIONS AND SHOULD BE REFUSED

POLICY 34 of ADUR LOCAL PLAN states that development should not result in pollution or hazards which prejudice the health and safety of the local community and the environment.

ADUR PLAN SUSTAINABILITY ASSESSMENT – NPPF message states the planning system should prevent new and existing developments contributing to unacceptable levels of air pollution.

AIR QUALITY STRATEGY ASSESSMENT ADUR 2017 states that the main threat to air quality comes from the number and scale of planned developments.

NPPF – para 170 (e) Development should help to improve local environment conditions such as air.

Each car on the road is adding pollutants to the air



Ground Water Concerns:

New Monks Farm site sits within an Environment Agency high risk of flooding Zone 3 area with a greater than 75% risk of flooding from ground water. The Flood Risk assessment references monitoring during a period when rainfall levels were low, and the real influence of high ground water levels are not recorded. This masks the impact of rising ground water on the drainage of the site. Realistic data is vital to ensure that all calculations of ditch capacity/flows are correct! There are also concerns regarding management of water quality prior to discharge to the receiving watercourses when draining the residential areas of the site. This issue was raised within the final report by the lead Drainage Authority.

More work needs to be done on groundwater influences and water quality management to justify sustainability.



Grinstead Lane

Tidal Rise/Sluices Concerns:

Lancing Brooks ditch network drains the whole of Lancing catchment area. Flows run south/south eastwards and outfall through tidal sluices into the Adur River lagoon next to the estuary. Within the Flood Risk Assessment documents and the Environment Agency submission documents there has been no evidence to show that these tidal sluices (open when tide out, closed when tide in, twice daily) will manage the area's ditch drainage sustainably, including that of New Monks Farm for the lifetime of the development. EA projections for annual tidal rise have been made until the year 2115. As sea levels rise, sluices will be open for less and less time. It is estimated that within 2 decades, flows into the ditches will have to be contained for well over 8 hours as opposed to the 6+ hours experienced at present – a 30 to 40% increase. Year by year containment time becomes longer. The longer the time, the higher the ditch water levels. In times of extended extreme weather events, this may mean flooding of not only the New Monks Farm site but upstream and downstream of the site.

Sluice infrastructure is as important as the increased protection from tidal walls enhancements currently being installed. Neither the applicant/local authority or Environment Agency have addressed this issue.

The proposal is to connect the entire New Monks Farm into a failing main sewer which had insufficient capacity for B&HA's Training Academy.

The Academy installed their own internally processed foul waste treatment plant (PTP) with no need for a main sewer connection.

That main sewer has fully inundated with long term groundwater flooding in 4 out of 6 last winters with:

- Many residents' loss of foul waste facilities
- Burst manhole covers with sewage in roads and gardens
- Road and lane closures
- Tankering and over pumping into ditches for up to 8 weeks.

Southern Water's NMF specification is geared to a 1 in 30-year weather event. In those 6 winters, 2 of the years experienced 1/100-year events (up to 195% of average rainfall for 3 months) and two at least 1 in 30-year events. In such weather periods this additional flow from NMF into an already overburdened sewer will exacerbate problems for the Lancing community and the water authority.

During such events, main sewer inundation means pumping from NMF will not be possible because of a lack of sewer capacity. During these frequently repeated, extreme conditions millions of litres of foul waste will back up onto the NMF site with inevitable loss of facilities for residents, IKEA and the Training Academy. **A fully specified dedicated sewer run to the processing treatment plant should have been planned to ensure site sustainability for foul waste management. All these unaddressed issues mean that the NMF drainage has not been demonstrated to be sustainable for its lifetime and may lead to problems elsewhere.**

REASONS TO REFUSE FOR LACK OF SUSTAINABILITY

Noncompliance with:

Adur Local Plan 2017

Policy 36: Flood Risk and Sustainable Drainage

All development or changes of use to a more vulnerable use, regardless of flood zone or size, where flood risk from other sources (surface water, sewer, groundwater) is identified by the Strategic Flood Risk Assessment. The flood risk assessment will need to demonstrate that development:

- will be safe for its lifetime taking account of the vulnerability of its users;
- will not increase flood risk (including sewer flooding, surface water and groundwater flood risk) elsewhere;

Policy 35: Water Quality and Protection

Development will be permitted provided that: It does not have an unacceptable impact on the quality and potential yield of local water resources and the water environment; also, it protects and enhances groundwater, surface water features and controls aquatic pollution to help achieve the objectives of the Water Framework Directive

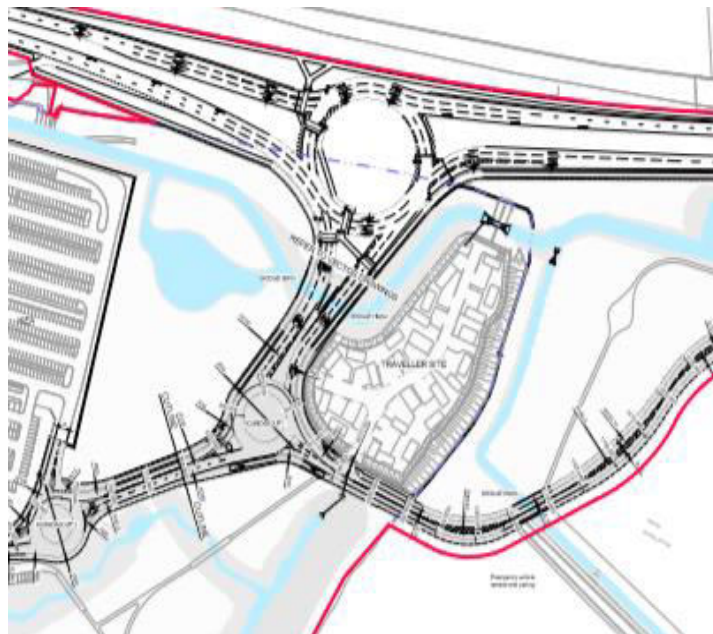
National Planning Policy Framework

Para 160 (b) The development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible will reduce flood risk overall.

Para 163(b) When determining any planning applications local planning authorities should ensure that flood risk is not increased elsewhere Development should only be allowed in areas at risk of flooding where.....it can be demonstrated that:
The development is appropriately flood resistant and resilient.

WITHY PATCH TRAVELLERS & GYPSY SITE

At present, the residents reside in a small community off the A27, heavily screened by trees. The development proposal is to relocate the community to a new site on the New Monks Farm development. The majority oppose the move.



The site, which is basically an island, will be surrounded by 3 roads, the A27 with its new roundabout, the access road leading to the internal roundabout for Ikea and Cala housing and the new road to the Airport. The development will take 8 years to complete. Construction time for the roundabouts and roads will be 2 years. Working hours for the site will be **7am to 7pm Mon-Fri and 7am to 1.30pm Saturday**.

The intention is to shield the residents from the dust, noise and air pollution by erecting a 2metre fence. The developers state that the amount of dust will be LARGE so between the dust, noise and increased traffic, what **protection** will a 2m fence give the residents?

Whilst the construction of the roads and roundabouts take place, metres from their homes, they will also have to contend with all the additional construction work for the Ikea, 249 Cala homes and the Airport development - 8 years of air and noise pollution, dust, traffic and delivery vehicles, 12 hours a day, 5 days a week and 6 and a half hours on Saturdays, not forgetting the Ikea traffic once it's open!

They will see an **increase** in traffic from the 3 roads, of a minimum 2,500 vehicular trips past their site in the am. peak hour, 2,700 pm. peak hour & 2,300 Saturday peak hour (source Vectos 2017 v 2027).

During 4 years of the Withy Community's uncertainties about this relocation, the statutory body responsible for such sites, West Sussex County Council, has so far failed to consult with the community or to their knowledge, with the applicant or Adur District Council on this matter. This may well become a human rights issue.

This location is totally inappropriate and unacceptable for the community and the plan should be rejected on the following local and government planning policies: -

1. Adur Local Plan 2017 Policy 23 Provision for Gypsies, Travellers & Travelling Showpeople

Developments should be of a scale that is sympathetic to the local environment and should not have an unacceptable adverse impact on the amenities of both residents of the site and occupiers of nearby properties, **particularly in respect of noise and disturbance from vehicular movements**, on site business activities and other potential sources of noise.

2. Dept for Communities and Local Government. Planning policy for traveller sites Aug 2015

Policy 13(e) Provide for proper consideration of the effect of local environmental quality **(such as noise and air quality)** on the health and well-being of any travellers.

3. Article 8 Human Rights Act states that people have the right to peacefully enjoy their home, **free from noise and pollution**.

Adur Employment , taken from Nomis labour market statistics 2018

There were 63,700 people living in Adur, 74.8% were in employment, 3.7% (485) registered unemployed. The comparable national average figures were 75% in employment, 4.3% unemployed.

- Unemployment in the Adur region is lower than the national average.
- There is a significantly lower number of people in Adur working in professional jobs (15.3% compared to a national average of 20.3%). More professional opportunities seem to be the primary need.
- There is a correspondingly relatively low level of academic achievement in Adur , with only 28.7% of people having qualifications of NVQ4 or higher, compared to a national average of 38.6%. So it could be argued an expansion of academic/training opportunities is a priority in the area.
- Adur has 20% of its workers in wholesale/retail compared to the national average of 15%
- There are clear signs of economic improvement in Adur. Employment and business stocks have grown steadily and there has been a steady transition from public to private sector employment. 62% of Adur businesses that were formed in 2012 were still trading in 2015 compared to 59% across England.
- However, gross median earnings for all workers in Adur are still 5% below the national average

Impact of IKEA on the local employment situation

IKEA estimate they will employ 350 retail staff and 80 support staff, 60% of which will be part time, making a full time equivalent of 172 jobs. The proposed development could generate around 332 construction jobs a year for 8 years; Adur would probably lack the capacity to provide the construction workers necessary, so many may come from outside the area – thus creating extra traffic.

According to IKEA data in April 2018, the average hourly rates for IKEA shop floor staff vary from £6.70 for a warehouse worker to £10 for a driver's mate. Salaries vary from £10,000 a year for sales advisers to £40,000 for regional managers. It appears there is no shortage of work at the warehouse/customer service level in the Adur.

Conclusion

There is little evidence that the sort of work that IKEA will bring is in demand locally at present. We were unable to discover IKEA'S policy with regard to bringing in managers from outside the area.

The overall level of employment in the Adur region is relatively high. The key issues for the Adur region are:

- Relatively low educational and skill levels of available workers
- Relatively low level of professional/managerial jobs
- Shortage of care and health service workers
- Gross average median earnings 5% below the national average

It is difficult to see how the advent of an IKEA store would address these key issues.

Adur and Worthing Economic Strategy 2018-2023 states, "This is not about growth at any price: we are committed to "good growth" that balances economic success with the best quality of life for our people, sustains our natural assets and the environment and continues to attract increasing numbers of visitors." Will IKEA contribute to the future aim of "plenty of rewarding jobs, for access to high quality education and training?"

A core commitment to achieve a forward looking, successful economy is to "champion the development of a learning and skill system that enables economic growth."

IKEA will deter visitors due to the increased traffic; it will damage local businesses due to increased traffic; it will damage quality of life due to pollution and traffic; it will not sustain our environment.

IKEA WILL NOT FULFIL THE AIMS OF ADUR'S ECONOMIC STRATEGY.

IT CONTRAVENES THEM.

FINANCIAL VIABILITY - IT'S ON A KNIFE EDGE!

Infrastructure costs have soared from £20m in 2016 to £46m in 2018!!

This is a key issue that may prevent a successful outcome for the development. The Gleed's independent assessment highlights the fragility of the applicant's profitability from this development.

Officer's Report 18th July 2018 (pages 152–159)

'Although this scheme provides a profit for the developer it is significantly lower than would be expected. Based on the figures provided, NMF Development Ltd can expect a return of approximately 7%. Considering the amount of risk and expected duration of this project, this is a level that would deter most developers from undertaking this development.'

The projected return is only £5m, despite the support of £5.7m from the Government's Local Growth Fund (Public money) and the substantially increased commercial space for an IKEA, 10,000 up to 32,000 sqm. If a major issue is encountered during construction and funding falls short, what will be the outcome for the Authority and even more importantly, the local community.



Addendum Report 18th July 2018

At this stage, there is no agreement about the precise level of contribution for the primary school, however, there is a requirement for contributions for secondary education and sixth form education (£1.15 million). Given the viability of the development set out in the main report, this contribution could not be met, and members are left in a difficult position in terms of weighing up the priorities of different infrastructure providers.

To meet the education requirements for the development it would mean that contributions secured for health services and the police are diverted to education and inevitably a request for a reduction in the percentage of affordable housing delivered.

With the provision of the school already under threat and affordable rented housing having been cut from 75% to 60%, what other reductions of affordable housing can we now expect? Will those 180 affordable homes ever be built? Are the £3.9m contributions to health, policing, and other S106 requirements also under the threat of reduction?

It is understood that an application refusal cannot be made purely on lack of viability concerns – but a refusal can be given on the outcomes and failures from what are the perceived funding shortfalls and unaddressed planning considerations as described in this document.

COUNTRY PARK NOW REDUCED TO 24.058 HECTARES

The Government Inspector's report stated that a country park of a minimum of 28 hectares is designated.

Inspector's report Sept 2017

New Monks Farm, Lancing (Policy 5)

57. In terms of the commercial floorspace the introduction of a degree of flexibility into the policy will enable consideration of all the elements of any proposal to be undertaken in a comprehensive way, taking into account issues of viability. There is no reason to conclude that the floorspace figure would be significantly exceeded because policy 5 still requires the provision of a country park (**at least 28ha**), the implementation of a landscape strategy and the provision of green infrastructure.

59. In the interests of consistency the Council proposes to refer to the Country Park being a **minimum size of 28 ha**. This reflects the most appropriate strategy to follow and is therefore recommended (MM9).

To reach 28ha the developers have included an area which is owned by the airport, and land to the east of the Ikea car park which is inaccessible due to being surrounded by roads



Officer's Report Page 173

The reduction in size of the Country Park, therefore, is of more significance in terms of its impact on the wider landscape and eroding the sensitive Local Green Gap and its objectives of avoiding coalescence.

The country park size reduction fails to comply with Adur Local Plan – 5 another material consideration to **refuse this application** and this was **agreed in the Officer's report**, page 172, July 2018

Adur Local Plan Page 30

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.

Reason to refuse: Adventure play area removed contrary to Policy 5

Paths within the country park are too narrow for cycle use at only 2m wide. They should be at least 3m wide and bridges need to be doubled in width to remove conflict between cyclists and pedestrians.

UNSAFE, DOWNGRADED PATHWAYS FOR PEDESTRIANS, CYCLISTS AND EQUESTRIANS

All the cycling and equestrian groups have vigorously challenged the quality of NMU pathway proposals both within NMF and for crossing the A27 into the National Park. Particularly, the pathway proposed along the river bank and beneath the flyover is too narrow and dangerous for multi types of NMU users. The Police have also commented on concerns for the safety aspects of that pathway with reference to: remoteness, visual openness and natural surveillance. It should be well overlooked, wider, well-lit and avoid potential hiding places.

Adur Local Plan –Policy 5 - Page 27

2.51 It will be essential to ensure that safe and improved pedestrian, cycle and equestrian access across the A27 to the South Downs National Park is provided.

Additionally, the roundabout will need to be designed to minimise any landscape impacts it may have, particularly given the proximity of the National Park. **New pedestrian and cycle networks should integrate with existing routes as far as possible.**

Adur Local Plan – Policy 5 – Page 29

‘IMPROVED access across the A27 to the South Downs National Park for pedestrians, cyclists and equestrians must be provided.’

Adur Local Plan Policy 5 – Page 29

Policy 5: New Monks Farm, Lancing: Land at New Monks Farm (as shown on the Policies Map) will be allocated for mixed use development comprising:

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.

National Planning Policy Framework 2018

Para 104e

Provide high quality walking and cycling networks and supporting facilities such as cycle parking (drawing on local cycling and infrastructure plans)

Para 108

In assessing sites that may be allocated for development, or specific applications, for development, it should be ensured that

b) Safe and suitable access to the site can be achieved for all users

Para 110

Within this context, applications for development should give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas.

Create places which are safe, secure and attractive – which minimise the scope for conflicts between pedestrian, cyclists and vehicles,

What is proposed would actually reduce the quality of the connection to the National Park through the extra distance people would have to travel, the delay this and the crossings at the roundabout would introduce, and the unsafe nature of the new bridleway alongside the River Adur

The revised NPPF should have resulted in a full review of the proposals. However, given the rushed nature of the process we do not see how there has been time for this and the absence of any new plans suggests that this has not occurred in any meaningful way. The development would result in increased congestion, pollution and carbon emissions and the current layout would undermine any travel plans. It would result in an unhealthy and degraded environment and a lower quality of life.

Paragraph 2.51 states that safe and improved access across the A27 should be provided. As you will know from this and other objections, many organisations do not believe that such a narrow path alongside the River Adur would be safe with the mix and volume of users. Equally, the delays and diversions of the proposed alternatives means they should not be classified as improvements. Therefore, unless the application is changed to provide improved access across the A27 and to Lancing and Shoreham, **then the development does not conform to Local Plan Policy 5 and is grounds for refusal.**



Viability should not be an excuse to allow a sub-standard development to go-ahead, only for the public to pick up an even bigger bill to rectify its short-comings at a later date.

In every aspect, these NMU proposals fail to meet Local Plan Policies and NPPF requirements and should be refused.

SYNOPSIS OF ISSUES ADDRESSED IN THIS BOOKLET

The Local Plan was adopted less than 12 months ago.

Less than 10 months later, look at the changes.

NMF commercial - was 10,000sqm

NOW - 32,000sqm for IKEA

Country Park – was 28 hectares

NOW – 24 hectares

Airport commercial – was 15,000sqm

NOW – 25,000sqm (14% reduction)

Local Plan – called for 41,000sqm commercial space by 2032

NOW – 57,000sqm total already, nearly 50% higher

Community Hub – **GONE**

Children's activity park – **GONE**

Funding for primary school – **IN DOUBT**

Land/funding for 30 place day care nursery - **IN DOUBT**

OTHER ISSUES

Ikea's Sept 2018 updated plans do not address SDNPA concerns therefore they maintain their objection

Relocation of Withy Patch community – with no consultation and the majority not in favour

Lack of financial viability

Downgraded and inadequate NMU access to National park

Questionable solutions to drainage and sewer problems

No feasible solutions for increased traffic problems

Long construction working hours 7am to 7pm weekdays; 7am – 1:30 pm Saturday should be reduced to 8am to 6pm weekdays and 8am to 1pm Saturday in line with other large developments

Roads in Mash Barn congested with parked cars making an increase in bus routes dangerous

No importance attached to health risks from air pollution to occupants of cars

No agreed solution for revised helicopter flight paths and safe drop-down zone

No acknowledgement of increased noise and pollution levels for local residents and the relocated Withy Patch community

Adur's employment needs are not being addressed . Low skill, part time jobs are not needed

Damage to landscape views into and out of the National Park and the area.



AREA and associated groups hope this booklet has provided assistance in understanding the many complicated issues surrounding the New Monks Farm development.