

Report to	<b>Planning Committee</b>
Date	<b>12 August, 2021</b>
By	<b>Director of Planning</b>
Local Authority	<b>Adur District Council</b>
Application Number	<b>SDNP/20/05236/FUL</b>
Applicant	<b>The Community Stadium Ltd/Lancing College</b>
Application	<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.</b>
Address	<b>Land Adjoining The Northern Boundary of The A27 Coombes Road, Lancing</b>

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**Recommendation:**

- 1) That planning permission be granted subject to the conditions set out in Section 10 of this report and subject to the completion of a Section 106 legal agreement, the final form of which is delegated to the Director of Planning with obligations relating to:
- The provision of species rich grassland/wild flower planting enhancements for a period of 30 years at land to the north of the site at Hoe Court Farm to include the provision of off-site reptile mitigation and an appropriate habitat management plan;
  - Deed of Variation to S106 agreement secured under SDNP/18/00434/FUL to reflect the amendments proposed to Coombes Road (east) junction with the A27 (stopped up, landscaping) and to ensure all other obligations within that agreement are secured.
- and note that the Committee confirm in their decision that they have taken into account:
- the environmental information as required by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017;
  - all matters referred to in the Director of Planning's report including comments received from statutory consultees and other interested parties, and;
  - all other material considerations
- 2) That authority be delegated to the Director of Planning to refuse the application with appropriate reasons if the S106 and Deed of Variation are not completed or sufficient progress has not been made within 6 months of the Planning Committee meeting of 12<sup>th</sup> August 2021.

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## Executive Summary

This proposal seeks to create an additional arm from the approved roundabout as part of the New Monks Farm and Shoreham Airport developments in the neighbouring district of Adur and Worthing. The 4<sup>th</sup> arm would create a link road to Coombes Road (West) running parallel to the A27. The proposal also includes the stopping up of the existing signalised Coombes Road (East) junction with the A27 to vehicular traffic.

This application has come about as a result of the consented works associated with the New Monks Farm scheme which necessitate the removal of the Sussex Pad signalised junction and 'at grade' pedestrian crossing (also used by cyclists and horse riders), and alterations to Coombes Road (East) to 'left in/left out' and diversion by way of the Shoreham Flyover.

Discussions between the two applicants (Lancing College and New Monks Farm Development Ltd) began prior to the New Monks Farm (NMF) application being approved by Adur Committee in 2020. The decision was initially deferred to enable an agreement to be reached between the NMF applicant and Lancing College regarding the provision of the 4<sup>th</sup> arm link road – albeit not a requirement of the access strategy for the New Monks Farm development.

The loss of the Sussex Pad 'at grade' pedestrian crossing and the junction alterations which remove the ability to turn right of out Coombes Road was considered controversial at the time by a number of amenity groups, local residents and Lancing College. The latter consider efficient and safe access to the College is required to ensure it remains competitive in its sector of the market and to protect the College's operations which include Lancing and College farms, Lancing Equestrian Centre as well as the school itself.

It is recognised that Lancing College plays an important role in the South Downs area as the custodian of significant heritage assets in the form of Listed Grade I, II and II\* buildings, Estate business operations including Lancing Farm and Lancing Equestrian Centre, open spaces, woodland and public rights of way within the 550 acre Estate. It contributes to the social, economic and environmental wellbeing of the area being a significant local employer and through its engagement works with the local community, in particular school and community groups.

Concerns have been raised about the impact of the development on highway safety and non-motorised users; residential amenity in terms of air quality, noise and vibration have also been raised; as have concerns in respect of flood risk; landscape harm and ecology. The application is supported by an Environmental Statement which assesses the degree of these impacts and suggested mitigation. Where necessary the scheme has been amended or additional information provided to address concerns. The statutory consultees raise no objections to the proposal.

The proposal has been amended during the process of this application to include changes to the design of the link road to better reflect the context of a rural gateway to the South Downs, and guidance in the 'Roads in the South Downs' publication. Additional planting/landscaping has been provided including between the two carriageways which offers multiple ecosystem services benefits, and would be secured, along with its management, through a condition.

Significant enhancement would be secured through S106 legal agreement by turning over approximately 19 hectares of Hoe Court Farm directly north of the link road to species rich grassland/wildflower meadow for 30 years.

The application site straddles two local planning authority areas and a duplicate planning application has been submitted to Adur District. It would require both authorities to approve their respective applications to enable the development to be implemented. A resolution to grant planning permission was approved at Adur's Planning Committee on 19<sup>th</sup> July subject to the requirements of a legal agreement to secure off site mitigation and enhancements.

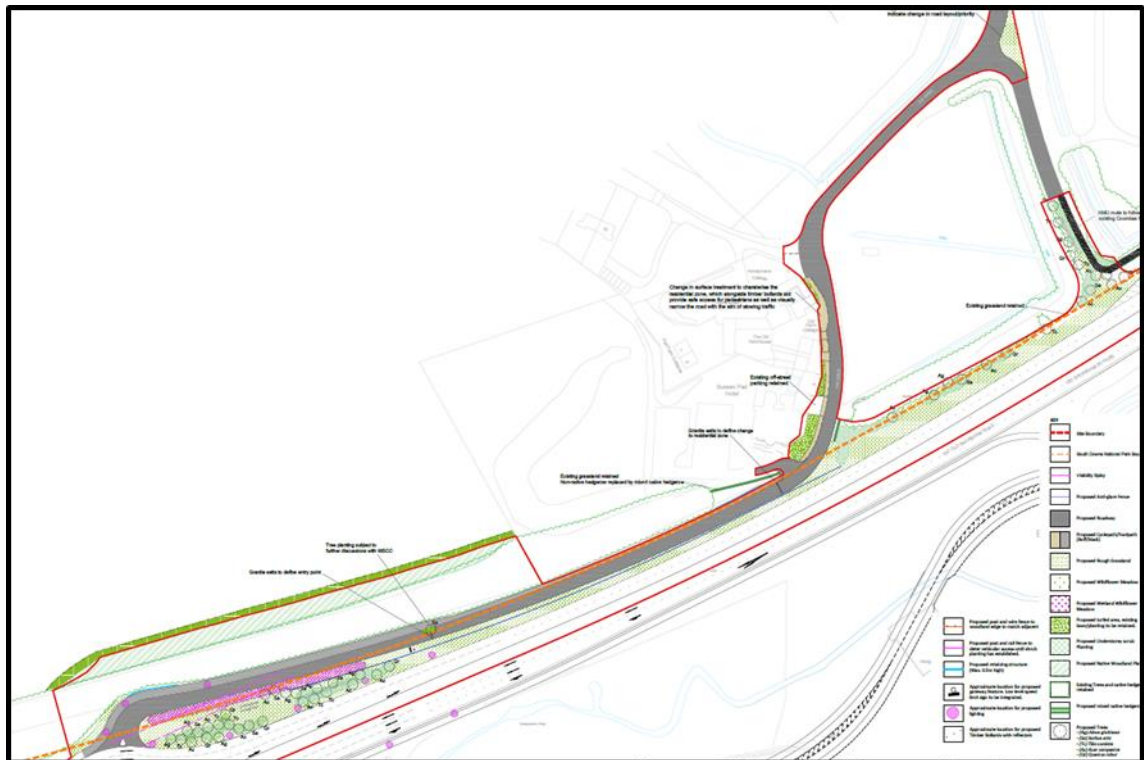
It is acknowledged that the development would result in some small harm to the outlook and amenity of the properties on Coombes Road (west), as this public highway changes from a no-through road to a two directional link to the consented new roundabout on the A27. Amendments to the road design and landscaping have sought to address these issues as far as possible. Similarly, the application is viewed positively by many who believe the changes to the access arrangements would provide wider benefits to other users of Coombes Road (west) and Lancing College by providing a direct link to the A27 roundabout, avoiding the need for a protracted diversion to the Shoreham Flyover (Steynings Road roundabout) before being able to travel west. The proposal will provide an enhanced NMU user experience with the closure and landscaping of Coombes Road (east) junction. The proposal provides a significant biodiversity net gain.

On balance therefore it is recommended that the application be approved.

## Site Description

- 1.1 The site comprises approximately 3.71 ha of land running adjacent to the northern side of the A27 between the approved New Monks Farm A27 Roundabout (see planning history at Section 2) and Coombes Road (west). The site straddles two districts: Adur & Worthing District Council to the south and South Downs National Park Authority to the north.

**Figure 1** below illustrates the administrative boundaries marked by an orange broken line running parallel to the east bound carriageway of the A27.



**Figure 1:** General arrangement plan showing the administrative boundaries marked by broken orange line.

- 1.2 The site includes the existing junction at Coombes Road (East), Coombes Road (West) and a 100m length (approx.) of the A27.
- 1.3 Shoreham Airport is to the south of site, Lancing College and associated land is to the north. The Shoreham flyover is to the east approximately 800m from Coombes Road (East) junction and approximately 1.4km from the consented NMF roundabout. The river Adur runs on a north south axis to the east of the site.
- 1.4 In relation to the development which falls within the South Downs National Park area, this

comprises an area of replanted woodland bordered by arable field and roadside verge. The application site red line includes a stretch of tarmacked public highway, Coombes Road (West), the connecting Drive to the junction with Coombes Road (East) and the Coombes Road (East) junction itself.

- 1.5 There are a cluster of buildings on the west side of Coombes Road (West) including four residential dwellings and Sussex Pad a former hotel that is now Little Lancing nursery school.
- 1.6 North of the A27, the site sits within landscape two character areas: Adur Valley Sides and Adur Floodplain. The Adur Estuary Site of Special Scientific Interest (SSSI) is approximately 300m to the east of the site.
- 1.7 There are a number of public rights of way (PRoW) in the area which broadly follow the contour lines of the landscape, with short sections crossing contour lines directly to provide connections to other routes. This includes PROW from The Drive to Lancing Rings. The consented NMU route connecting the existing PRoW Ref: 2049 which runs north-south along the banks of the River Adur beneath the A27, with a new east-west route along the northern side of the A27, providing a link between the existing network and extending west and north of Coombes Road.

## **2. Relevant Planning History**

- 2.1 SDNP/18/00434/FUL - Provision of a footpath/bridleway between Footpath 2049 and Coombes Road running parallel alongside the A27 northern boundary with associated hard/soft landscaping and retaining structures. Approved 11th September 2019 Subject to S106.
- 2.2 SDNP/18/01057/PRE - Development of a separated access (fourth arm) from the proposed New Monks Farm roundabout to Coombes Road. Pre-application advice given 12th May 2020.
- 2.3 SDNP/20/03840/SCREEN - Screening Request: Construction of a new highway link providing a connection from the approved New Monks Farm A27 Roundabout to run along the northern side of the A27 to the southern end of Coombes Road West. Decision made that EIA was required on 28th September 2020.

### Adur District Council (adjacent authority):

- 2.4 AWD/1093/17 Outline planning permission for the erection of new commercial buildings to provide up to 25,000m<sup>2</sup> of floorspace for Light Industrial (Use Class B1c), General Industrial (Use Class B2) and Storage and Distribution (Use Class B8) with access, landscaping and associated infrastructure (including a new pumping facility on the River Adur). This application was accompanied by an Environmental Statement (ES). Shoreham Airport, Cecil Pashley Way, Shoreham (Brighton City) Airport, Lancing, West Sussex, BN43 5FF. Approved 27/12/2019.
- 2.5 AWD/0961/17 Hybrid 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, two additional football pitches 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 was accompanied by an Environmental Impact Assessment. Land west of New Monks Farm, Mash Barn Lane, Lancing. Approved 4 February 2020.
- 2.6 AWD/1906/20 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 was accompanied by an Environmental Statement. Resolution to grant planning permission subject to further discussion with South Downs National Park Authority regarding a legal agreement to secure off-site biodiversity enhancements 19<sup>th</sup> July 2021.

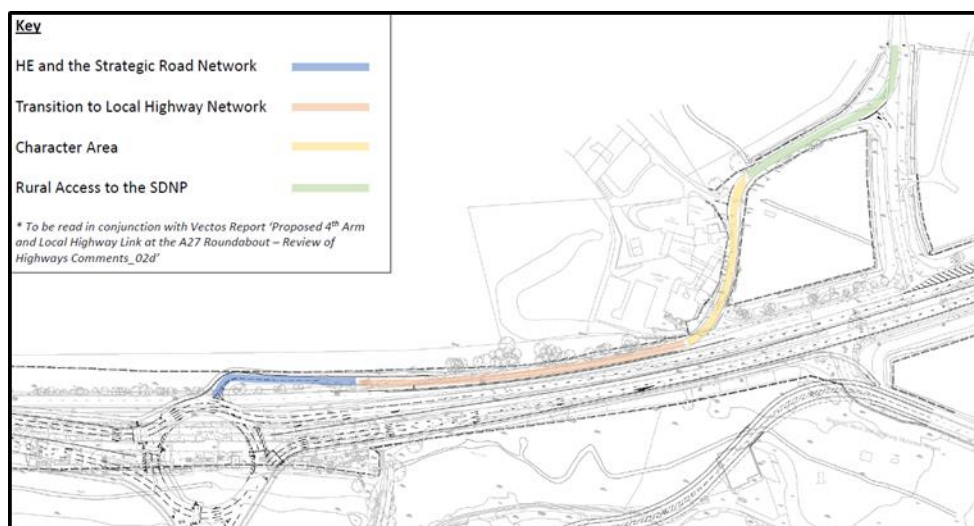
### **3. Proposal**

#### Background:

- 3.1 The proposed development is a response to the development of New Monks Farm (NMF) for 600 houses and a new non-food retail store (see planning history above) in that it seeks to address what was considered a weakness in the approved schemes and to address concerns made by Lancing College, Adur Planning Committee and Historic England to the original scheme concerning the negative impact of the development on the future viability of the College due to access issues at the Coombes Road east junction in the absence of a 4<sup>th</sup> arm.
- 3.2 This application includes consultation correspondence received from Historic England at that time (dated: 13.07.2018) submitted in response to the NMF development which states Historic England shared the concerns of Lancing College and would not want to see the “historically highly significant, educational establishment comprising purpose-built, architecturally outstanding buildings put at risk... and supports the view put forward by the College that agreeing an acceptable solution to the issues raised regarding access to the campus is important and that it is vital that this is secured as part of the current process”.
- 3.3 Lancing College subsequently withdraw its objection to the NMF development following a commitment from the developer, The Community Stadium Ltd, to pursue the application for the 4<sup>th</sup> Arm. Lancing College and New Monks Farm Development Ltd are joint applicants for this proposal.
- 3.4 The approved NMF development provided for a signalised 3 arm roundabout providing access to the New Monks Farm development including Shoreham Airport along with the 25,000sq.m mixed commercial uses approved under reference AWDM/1093/17.
- 3.5 The approved scheme includes signalised crossing facilities at the roundabout, off carriageway foot/cycle route along the southern side of the A27 and a foot/cycle link to the north side of the A27 between Hoe Court and Coombes Road.
- 3.6 As part of this approved scheme, the existing Old Shoreham Road and Coombes Road signalised controlled junctions would be removed. Access to Coombes Road would be retained as a ‘left in/left out’ arrangement from the eastbound carriageway of the A27 only.
- 3.7 This results in a diversion route via the Shoreham flyover junction for all westbound traffic exiting Coombes Road.

#### Current Application:

- 3.8 The current application seeks to construct a 4<sup>th</sup> arm from the A27 roundabout, approved as part of the New Monks Farm application, to create a 330m long link road to the existing adopted highway at Coombes Road (West). The existing junction at Coombes Road (east) will be closed to vehicular traffic.
- 3.9 The road would include a separate 3m wide foot/cycle way along the northern side of the carriageway, for the first approx. 160m after which the footway reduces to a 2m footpath with cyclists joining the carriageway. This first section of the new link road will be adopted by Highways England and the remainder by West Sussex County Highways Authority – see figure 2 below.
- 3.10 The link road would be split into 4 character areas as follows:



**Figure 2:** 4<sup>th</sup> arm character areas

- 3.11 Section 1 – Under the control of Highways England and provides point of access to and from the strategic road network. A traditional carriageway with a 30mph speed limit, centre line markings, advance directional signage and lighting on the approach to the A27 roundabout would be incorporated. The lighting would be appropriate to a dark night skies location with no upward light, details of which would be secured through a condition. A separate off-carriageway foot/cycle way links with the crossing facilities on the A27 roundabout.
- 3.12 Section 2 – marks the transition to the local highway network and would fall within the control of the West Sussex Highway Authority. The design features of this section of the road have been amended following SDNPA officer advice in consultation with the local highways authority, to better reflect the guidance set out in 'Roads in the South Downs'. Centre line markings, traffic calming features and carriageway markings have been removed along with the 20mph zone. Carriageway narrowing's have been retained in some locations and granite setts introduced immediately west of the point at which the footway reduces to 2m and to assist with the transitions of cyclists joining the carriageway.
- 3.13 Section 3 – character area at Combes Road (West). This section has curves at either end providing a natural control of speeds expected to be less than 30mph. Speed cushions have been removed along with the white centreline. This route is designed to be more visually in keeping with the context of the road and the rural nature of the area.
- 3.14 The carriageway would be narrowed by a build-out and timber bollards to increase the separation of vehicles from the residential properties along this section, and to provide a suitable footpath width, marked by buff coloured material. All accesses to existing properties would be retained.
- 3.15 Section 4 – rural access to the South Downs National Park – this section includes The Drive to the junction with Coombes Road (East) and, as is the current situation, no footway, lighting or kerbs are proposed. This junction is re-prioritisation: 'give way' south of the junction along Coombes Road (East) and the existing traffic island with reflective bollards would be removed, so as not to interrupt the flow of traffic along this section. Timber bollards with reflectors positioned along the south and east side of the carriageway are proposed. A northern gateway feature would mark the transition from the 30mph speed limit to that currently for the north section of Coombes Road of 60mph.
- 3.16 The proposal would result in the removal of some trees and vegetation along the highway verge and embankment. Tree removal consists mainly of low-grade trees and a section of laurel hedge. Areas of new woodland, native hedgerow and wildflower planting are proposed both along the northern edge of the existing vegetated bank and between the new link road and realigned A27. More details are provided in the 'Trees/ecology' at Section 7.

- 3.17 The highway will drain to a swale located between the new highway and the A27 which will be tanked and discharge to a 'northern channel' located to the north of the approved New Monks Farm development, and via the pumping station approved by that development.
- 3.18 Coombes Road (East) junction with the A27, would be stopped up to vehicular traffic and approx. 90m of carriageway dug up and landscaped with trees. The approved NMU would continue to run alongside this landscaped area.

Amendments:

- 3.19 Following discussions during the course of the planning application between the applicants, officers and the highways authorities, the road design has been amended to overcome concerns raised by the highways authorities and to reflect the advice in line with 'Roads in the South Downs' guide. The current scheme has been amended as follows since submission:
- removal of speed cushions, SLOW markings and much of the white centre line other than at junctions, and red coloured surface;
  - Route to be unlit other than the section in the west closest to the A27 roundabout (and which is required by Highways England);
  - Removal of build out near the nursery access and introduction of granite setts to nursery entrance;
  - Introduction of tree planting to the swale to aid moisture retention and to build-out along straight length of road (subject to discussion the highways authority);
  - 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;
  - Replacing non-native with native hedge, introduction of rough grassland planting along northern boundary and additional broad leaf native tree planting between the carriageway and along the stopped up Coombes Road (East) junction
  - Relocation of timber gateway features;
  - Provision of a temporary post and rail fence on Coombes Road (east) to control access until new planting becomes established.
- 3.20 It is considered that these amendments better reflect the existing local context of Coombes Road, as a rural road following the guidance in 'Roads in the South Downs' whilst meeting the usage and highway safety requirements of the road.
- 3.21 The speed limit would be 30 mph along the road's length, amended from 20mph, which allows for the removal of the urbanising features noted above. The road alignment with curves either side (at the Nursery entrance and at the junction with The Drive) will provide natural speed control, assisted by contrasting footway materials, timber bollards, and a pinch point in the most sensitive area alongside the Coombes Road (west) properties, will combine to ensure regular speeds of less than 30 mph.
- 3.22 A significant enhancement package (which also provides suitable reptile mitigation and significant biodiversity net gain) has been offered up on the whole of Hoe Court Farm field, a circa 19 hectare arable field directly north of the application site, to include:
- Reversion from arable to species rich grassland planting (following committed agreed crop rotation from wheat to legume to species rich grassland from 2022 – 2024);
  - 6m deep field perimeter planting of wildflower mix, and;
  - 1ha of species rich grassland west of Coombes Road (west).

This enhancement package provides reptile mitigation and will be secured by a legal agreement.

#### **4. Consultations**

4.1 A summary of the consultee responses that have been provided on this planning application is given below.

4.2 **Environment Agency** - No objection subject to conditions:

4.3 The proposed link road is shown to be within a tidal Flood Zone 3 (high risk) based on the development criteria, however, there is no objection on flood risk grounds. As identified in the supporting Flood Risk Assessment, 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 pumping station approved as part of the New Monks Farm application.

Officer note: the LLFA has confirmed the proposed Archimedian Screw pump(s) has the capacity to accept additional volumes from the above development.

4.4 **Natural England** - no objection subject to condition to secure appropriate mitigation:

The Environment Statement details mitigation measures to prevent water and air pollution impacts. The mitigation to prevent water pollution from suspended sediments, hydrocarbons, concrete and cement during construction are sufficient and therefore should be secured via a condition as well as measure to prevent impacts via water demand, flooding and ground water disturbance.

The Environment Statement explains the existing surface water drainage strategy will treat the surface water from the new development; mitigation measures to prevent impacts from dust and air pollution; mitigation measures under ecology and nature conservation which should all be secured by planning conditions.

4.5 **Highways England** – no objection subject to conditions:

Initial response was a holding objection requesting additional information:

The principle of a fourth arm on 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, holding objection on the basis of a number of design matters which need to be resolved.

Update: 02.06.21

Following a review of the additional information requested (including Stage I Road Safety Audit, Technical note, revised highway drawing) Highways England consider that subject to the application of necessary conditions they are satisfied that the development proposals will not unacceptably impact on the safety, reliability and/or operational efficiency of the SRN (the tests set out in DfT C2/13 and MHCLG NPPF2019).

Suggested conditions relate to stopping up Coombes Road (east) to vehicular traffic prior to operation of the new road, details of street lighting, and hard and soft landscaping, provision of a CEMP. The works to the public highway will require an appropriate legal agreement.

4.6 **WSCC Highways:** - no objection subject to conditions:

Initial holding objection requiring additional information:



- The provision of traffic calming or the 20mph speed limit is not a requirement of WSCC therefore justification for traffic calming and 20mph speed limit along with evidence of consultation with residents, emergency services and existing users of Coombes Road;
- Forward visibility at priority workings and for revised accesses;
- Details of proposed street lighting;
- NMU connectivity adjacent to the A27 between existing Coombes Road and new link;
- Further consideration of cycle links and equestrian use.

Update: 09.06.21 – no objection

Following the submission of additional information there is no objection to the proposal. The features proposed and the amendment of the proposed speed limit would remove the requirement for further consultation with local residents/emergency services over that already undertaken, and details of the proposed lighting and forward visibility at priority workings.

Stage I Road Safety Audit has been provided and agreed. The audit highlights 6 issues of which 4 were agreed (review of parking at detailed design/ screening of see-through locations/ anti-dazzle measures and reflective bollards). Two issues raised 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 streetlighting.

Non Motorised User connectivity further information and diagrams compares that of the consented scheme and the proposed. The proposals indicate a reduction in peak and off-peak vehicle flows north of the drive where no pedestrian provision is proposed. 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.

Cyclists would re-join the carriageway at the western build out travelling eastbound and will be required to cross the carriageway travelling west bound. Additional directional signage should be provide 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 could be secured at detailed design if required.

**4.7 Lead Local Flood Authority (LLFA) – no objection subject to conditions:**

Initial objection requiring further information - existing surface water flow paths across the site should be maintained and mitigation measures proposed for areas at high risk.

A network of Ordinary Watercourses exist in the New Monks Farm site to the south and the applicant is proposing a controlled discharge to one of these watercourses from the attenuation storage. Further details required of the attenuation storage design.

Updated comments 17/2/21

Following correspondence with the LLFA and West Sussex Drainage Engineer and the submission of an updated Flood Risk Assessment the objection is withdrawn subject to conditions.

The LLFA notes that appropriate values are being used in the calculation of volumetric run off and storage of storm water and acknowledges the clearance undertaken of the existing A27 culverts to the northern ditch carried out.

It is noted that the Applicant has agreed with Adur Worthing Council to restrict run-off to

an appropriate reduced rate and this is welcome. The clarification made in the updated Flood Risk Assessment (v1.2 dated May 2021) to the underlying flooding issues associated with the A27 and the means of remediating them are helpful.

**4.8 West Sussex Drainage Engineer – no objection subject to conditions:**

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. Happy for the rate of 2.9l/s to be taken forwards.

The rewording of sections of the Flood Risk Assessment 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.

**4.9 Ecology (HCC) - No objection subject to conditions.**

The proposal will result in the loss of 2128m.2 of woodland, scrub and grassland but will result in 2522m.2 of new woodland and wildflower grassland habitat creation.

Protected species – bats: trees with low potential for roosting bats will be soft felled and compensatory planting and a sensitive lighting strategy will mitigate for any reduction in foraging habitat.

Great crested newts – 2 ponds within 500m of the application last surveyed in 2012 when likely absence was confirmed. Although this report is 8 years old, it has been stated that there is a lack of connectivity between the pond and other potential breeding ponds in the wider landscape therefore no objection raised.

Badgers – monitoring survey indicate the holes affected by the development were not used by badgers. Given their known presence in the area and mobile nature, an updated site walkover should be carried out prior to commencement of development.

A Construction Environment Management Plan will be required by condition to mitigate indirect impacts of the construction phase of the development particularly in relation to The Adur Estuary SSSI located approx. 300m east of the site. A suitable Surface Water Drainage Strategy during the operational phase should be in place to ensure no degradation of the SSSI through polluted water runoff entering the network of water bodies, secured via a condition.

Update

The provision of enhancements on the north field at Hoe Court Farm will provide acceptable reptile mitigation. The updated reptile mitigation strategy is acceptable and will ensure protection and secure their long-term viability.

Use of the field to the north will also result in a measurable net gain in biodiversity over and above the initially stated 22% increase.

**4.10 Archaeologist (HCC) – no objection**

Archaeological matters have been scoped out of the Environmental Statement. It is noted that the Environmental Statement and Heritage Statement that the proposed road will run within the existing highway easement, then along the existing Coombes Road. The proposed works are below an existing scarp in an area where the original construction of the A27 has removed the ground surface. The archaeological potential has therefore been severely compromised if not altogether removed and there are no archaeological issues regarding these works.

If works compound etc are to be constructed outside the highway corridor as part of the implementation of this proposal such works may have an archaeological implication.

Officer note: details of site office, welfare facilities security hoarding etc will be secured through a CEMP by condition.

**4.11 West Sussex Public Rights of Way – comment:**

Since the creation of the new east-west bridleway along the northern side of the A27 linking Coombes Road East to the River Adur, the section of Coombes Road West, from the junction with The Drive (BW2065) to where it joins Coombes Road has become important to the PRow network as a link to bridleways either side.

As bridleways allow equestrian use, we welcome a 20mph speed limit and the retention of the rural character of this road but would like to see a sufficient road width to allow larger and noisier vehicles to give all NMUs a wide berth, avoiding ‘close-pass’.

**4.12 Adur Environmental Health - No objection:**

The modelling of traffic noise using traffic data is acceptable and the predicted noise levels at the children’s nursery matches what was actually recorded in 2019 for the change in use application for the Sussex Pad.

There are already high ambient noise levels in the vicinity and the guidance states 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 0.1 dB increase because of the traffic and this will be negligible over the time period.

There is no evidence to suggest operational vibration from the use of the road will be detrimental to the existing residents and there are no Environmental Health concerns.

**4.13 SD Historic Environment – no objection:**

The Heritage Statement shows various heritage assets which extend some way from the proposed road. None of these assets is physically affected by the proposed works; any harm would be on their setting. A significant number of assets are in Old Shoreham some distance from the proposed road and on the other side of the A27. The creation of a new road is unlikely to result in any substantive change or additional harm to their setting over and above that which occurred when the A27 was built.

North of the A27, a cluster of non-designated heritage assets is identified, including two pill-boxes and an anti-aircraft obstacle from WW2, plus a number of buildings (including Pad Farm, Old Farm Cottage, Honeymans Cottage and 4 The Drive) which are survivors, quite altered in most cases, of a small focus of settlement around the junction of Coombes Lane with the road from Shoreham.

The Heritage Statement identifies Coombes Road (west) as a non-designated heritage and it appears on the Yeakell and Gardner map of the 1770s. At present the various buildings face onto a dead-end, which carries relatively little traffic. An argument could be made that once the new road is joined onto the dead-end, the additional traffic passing the buildings would result in some harm to their setting, and that the integration of the Coombes Road West into a modern road patterns would further obscure its historic origin. However, when on site, it is hard to get any sense that the road is of any antiquity; it is quite different from Coombes Road as it heads north towards Botolph and Coombes. This is compounded by the noise generated by vehicles on the A27, which is very close at this point.

However, in assessing any harm, we should remember that they are all non-designated heritage assets and that some public benefits might arise from the creation of the new link road. On this basis too much weight should not be attached to any perceived harm and there is no objection to the proposal from a conservation/historic environment perspective.

**4.14 Sussex Badger Trust – no objection:**

No Badger setts within works area, and limited badger activity. Recommend that an adequate buffer of retained habitat will ensure that badger setts are not disturbed or

damaged during works.

**4.15 Sussex Wildlife Trust – comment:**

Clarity is required as to what is being provided as well as what is being lost in relation to biodiversity. Request that the SDNPA are clear as to where and when the biodiversity net gain is to be achieved as part of the scheme. Ecosystem Services Statement accompanying the application does not address implication of pollution on nearby SSSI. Avoidance and mitigation [of ecological assets] should be committed through the CEMP.

**4.16 Landscape - neutral**

Permission should be dependent upon securing a land management agreement and landscape enhancements. The application identifies the landscape's poor condition and existing negative effects resulting from the proximity to the A27, however, this is no justification for further erosion. The landscape was judged worthy of protection as part of the National Park due in part to its coherent ownership as part of Lancing College Estate.

The scheme has made some positive alterations to the road design which together with the mitigation and enhancements provided via the arable reversion is considered to adequately compensate for the negative effects of the proposal.

Road design - concerns previously expressed that the design of the link road was urban/suburban character, which would undermine the distinctive qualities of this part of the National Park.

- The scheme has been amended and the road design improved to better meet the criteria of the policy, although some intervention remain which are atypical of most rural roads;
- Tree planting within the carriageway as a pinch point is supported but needs the commitment of WSCC to be secured;
- The anti-glare fence, signage and gateway features further undermine the positive character of the route;
- Retaining walls in two places on the route can appear highly engineered of a standard highways type and materials.

Green Infrastructure (GI) and Connectivity:

- Replacing the non-native hedgerow with a native species is welcomed;
- Quality of the experience of NMUs in the landscape is already undermined by the A27;
- The enhancement package improves connectivity and mitigation for severance and could be secured through a legal agreement.

Views and Perceptual Qualities:

- The scheme will negatively affect perceptual qualities (tranquillity, dark night skies and sense of place) and in areas where these matters may be poor policies require this is not made worse or where possible it should be enhanced;
- The scheme proposes 10 street lights focussed on the main roundabout connection to the A27;
- The negative effects of the link road have the potential to be felt further into the National Park if more traffic moves through the Arun Valley. This has not been explored;
- The long-term visual effects of the road will be minimised by the proposed tree planting.

#### Ecosystems Services:

- The revised Ecosystems Services Statement draws out the interventions to demonstrate how that policy is achieved.

#### 4.17 **Tree Officer**— no objection subject to conditions:

The trees identified for removal are primarily of a low quality and value and although they provide some screening, their loss can be mitigated through appropriate replacement planting.

#### 4.18 **Lancing Parish Council** – no objection:

The Parish Council initially objected to the scheme on flood risk and drainage grounds; traffic congestion and pollution; inadequate level of consideration given to cyclists and pedestrians.

This objection has been withdrawn following an additional presentation to the parish council by the agent and their Flood Risk/drainage consultant. The background to the scheme was explained along with the amendments made to address concerns raised, including those previously raised by Lancing Parish Council in relation to flooding, traffic congestion, pollution and accessible routes for pedestrians and cyclists. It was resolved to withdraw the original objection.

### **5. Representations**

#### 5.1 8 representations have been received: 31 from householders objecting and 40 from householders in support. From amenity and other groups there are 10 objections (including Bramber Parish Council) with 2 in support (including Cllr Boggis, Ward Councillor for Peverel Ward, Sompting and Cabinet Member for Regeneration, Adur District Council);

The comments are summarised below:

Objections:

- Concern about safe provision for walkers, cyclists and horse riders;
- Concern about lack of safe crossing points from Coombes Road across the A27;
- Cyclists inconvenienced by diversion;
- Concern about conflict between cyclists and motorists;
- Benefits to motorised traffic at the expense of non-motorised users and sustainable forms of transport;
- Significant barrier to NMUs wishing to access the South Downs National Park;
- No access for walkers and cyclists from the airport circuit road to Coombes Lane and through the downs in either direction (consented NMF application);
- Level of provision for cyclists does not reflect current use;
- Does not promote sustainable travel;
- Increased traffic, noise and air pollution at Coombes Road (West);
- Concern about increased traffic and access and egress to properties along Coombes Road (West);
- Concern about college traffic queuing at the roundabout;
- Concern about heavy vehicles using the 4<sup>th</sup> arm at pinch points;
- Concern the 4th arm will result in bottle-neck and congestion for HGVs, commercial vehicles, tractors and caravans wishing to access businesses along Coombes Road;

- Does not take account of the transport needs of local businesses;
- Concern about restricted access for emergency vehicles;
- Concern about Coombes Road becoming a rat run;
- Concern about the loss of the right turn access into Coombes Road;
- Concern about increased flood risk;
- Concern about landscape impact;
- Concern about the loss of trees;
- Lack of consultation with neighbours and Coombes Road business;
- Creates unused area at the stopped up Coombes Road junction;
- Prefer 4th arm to be one-way and Coombes Road retained.

Support:

- Highway safety: avoids the need for large volumes of peak time traffic to merge with the A27 eastbound;
- Consented scheme requires a detour via Shoreham adding time, traffic and pollution;
- Reduction in traffic on the Shoreham roundabouts;
- Improved highway safety; roundabout will reduce speeds at Hoe Court and remove U turn point;
- Ease of access to Lancing College and safety to the users of the link;
- Provides improved access for Lancing College;
- More efficient, easy and safe way to access Lancing College, Coombes Road and South Downs National Park;
- 4th arm is a practical and workable solution to the difficulties created by NMF application to College operations and the frustration to Coombes Road residents and users, especially at peak hours;
- Positive transport benefits including reduced congestion at peak times, reduced journey times, avoids need to detour via Shoreham roundabouts;
- 4th arm will provide safe and convenient access for residents, businesses, Lancing College and other users of Coombes Road;
- Avoid unnecessary journeys on the A27;
- Negate the need for the lengthy diversion and associated pollution this would cause, reduction in journey times to and from Coombes Road;
- Proposal helps to support the NMF and Shoreham airport development which are essential for the long term viability of the airport;
- Promotes social and economic benefits associated with the college;
- Long term positive environmental benefits of the 4th arm development with traffic accessing and exiting Lancing College;
- Lancing College supports the local economy in many ways and to restrict access to and from it will have a negative impact on employees, students and local businesses who service it and are serviced by it;
- Safer cyclists and pedestrians access to the South Downs and crossing the A27;

- This application will mitigate the negative effect on Coombes Road users of the approved NMF scheme which results in the removal of the Coombes Road/A27 junction.

## **2 neutral comments:**

- Better access and information for non-motorised users required.

### Cllr Brian Boggis - Support:

- Benefit to the college through improved access;
- Impact on businesses and the local community during construction phase needs to be addressed.

### Bramber Parish Council – Object:

- Highway safety, increase traffic, narrow road with pinch points and rat run potential to avoid the A27;
- Concern about safety of non-motorised users (NMU) with increased traffic using Coombes Road;
- 4<sup>th</sup> arm should only give access to Lancing College and not be linked to Coombes Road;
- Retain the Coombes Road (east) junction as approved (left-in/left-out);
- Impact on tranquillity and safety of the route to Bramber;
- The rural nature of Coombes Road should be retained.

Representations received from resident and amenity groups:

### Lancing Manor SE Residents Network - objects:

- Inadequate consultation with neighbours, emergency services and existing users of Coombes Road;
- Impact on residential amenity of the three properties at Sussex Pad;
- Concern about adequate provision for service vehicles accessing these properties (for example to empty cesspits).

### 13 Business and Residents of Coombes Road – object

- Concern about bottleneck and congestion at access;
- The proposal does not take account of the 2000 commercial vehicles movements generated by farms and businesses along Coombes Road;
- Consideration should be given to retaining the existing left-in/left-out for other users of Coombes Road as part of this application;
- The updated Traffic Flow report contains evidence to suggest congestion, queuing, delay and compromise of access for fire and emergency vehicles would be likely;
- Traffic flow data on Coombes Road during busy periods is not clear.

### Adur Floodwatch Group: Object:

- Flood risk: recurring flood events on the A27;
- Removal of vegetation along A27, which acts as a buffer;
- No commitment or reference to how regular flooding will be managed.

### Cycling UK (Brighton and Hove) – Object:

- further consultation needed with focus on walking, disability, equestrian and wildlife groups as well as residents and cyclists.
- Concerns relating to the inconvenience through the cumulative impact of this proposal along with the approved New Monks Farm development and the closure the Sussex Pad,
- Insufficient consideration and provision for cyclists with priority given to motorised road users in contrary to the NPPF.
- Concern the scheme does not include the right infrastructure for NMU users and concern about dazzle from headlights;
- A fuller explanation of traffic management and measures to ensure safe passage of vulnerable road users is required;
- A clear map of cycling and walking connections and remaining gaps is needed: no return provision from NMU route, only eastbound direction is shown, what is the provision for NMU traffic westbound?
- Concern over the visibility of traffic calming measures as not all would be illuminated and request details of appearance of gateway feature at beginning of 20mph area.
- Conversion of The Drive to create a new link to the new roundabout will increase traffic and reduce air quality.
- Cyclist safety a key concern, it is also not clear who is responsible for maintaining the paths and cycleway;
- Highways England previously approved Coombes Road left-in/left-out arrangement so can have no objection to reverting to this earlier design;
- SDNP Roads in the South Downs design guide is out of date;

#### CPRE – Objects:

- The proposed development is not justified because there is no safety reason for the proposed 4<sup>th</sup> Arm and it is not a requirement of West Sussex County Highways authority and Highways England under the New Monks Farm development;
- The proposal will cause harm to the landscape character and biodiversity of the National Park through the removal of healthy trees and vegetation, and disturbing soils;
- New planting is proposed but 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 control to policy SD4, SD9 and SD11;
- The proposal will enable easier access to the A27/IKEA from Coombes Road which could significantly increase the levels of traffic using Coombes Road as a rat-run from Steyning to avoid congestion on the A27. This will be detrimental to the rural character of Coombes Lane, the amenities of residents, pedestrians, equestrians and cyclists, contrary to SD54 Pollution and Air Quality and SD20 Walking Cycling and Equestrian Routes.
- The proposed new road lies within Flood Zone 3 with risk of surface water flooding and that the discharge rate needs to be reduced to be compliant with policy.

Updated comments provided in response to additional/amended details provided during the consideration of the application:

- The amended scheme fails to meet the objections and policies of the SDNPA and will create new unintended consequences for Park users, fails to offer safe use by horse riders, pedestrians and cyclists.



- The through route will financially blight the residential properties and householder's quality of life. It may prove potentially socially damaging to the local communities and businesses in the Coombes Road area if it attracts new traffic;
- The proposed link highway with its closure of the Coombes Road/A27 junction, is determined by Highways England's desire to close that junction as the distance between the 'on' slip from Coombes Road and the 'off slip' at the Adur Flyover (to the A283) is purportedly 'sub-standard';
- A private road to the College will have minimal requirements as an access development on private land when compared to the considerably greater engineering, lighting and drainage standards required for a public through road.

Sustrans – Object:

- Sustainable access (by walking and cycling) to the South Downs Park is a key priority. It is estimated that 95% of visitors come to the Park by car.
- Directness of routes and avoiding diversions are more important for cyclists and walkers than they are for car drivers. Cycle routes should be continuous, coherent, direct, attractive and safe. It is likely that young people will be using this route on a daily basis. An indirect route would be a daily frustration and make walking and cycling less attractive.
- Councils should treat cycles as vehicles and not as pedestrians and shared paths should be avoided if possible including at crossing and junctions. This diversionary development does not treat cycling and walking on a par with travelling by motor vehicle.
- The recent pandemic has shown how important cycling and walking are to health and wellbeing and both have been continually promoted by the government.
- We note the issue of headlight blinding by oncoming drivers and comment that this issue also affects cyclists and pedestrians.

Adur Residents Environment Action (AREA) – Object:

- Concern about impacts of bringing traffic closer to the nursery school, with increased air pollution and impact on children's health;
- Concern about the removal of the bank, trees and shrubs as a natural barrier to air and noise pollution;
- Concern about the effects of air pollution, noise and safety risks on cyclists, pedestrians and equestrians as they will be required to proceed beside the over-capacity A27 to gain access to the National Park;
- Concern about additional traffic causing danger to NMUs of proceeding along the 4th arm beside the A27;
- Concern about building closer than 100 metres to a busy road (people suffer from 30% higher exposure to PM2.5 and 37% high exposure to NOx – the nursery school is 20 metres away);
- Concern about the inaccuracy of the applicant's prediction of NO2 levels for 2018 and 2020 which are well below the actual readings (AREA has undertaken their own measurements);
- Concern that the applicant's predicted levels of particulates are also inaccurate and no planning decision should be based on inaccurate air pollution readings; and

- Concern about noise pollution and noise levels at the identified receptors of the nursery schools and dwellings at Sussex Pad, Coombes Road West are already well above WHO limits.
- Concern about levels of PM10 and that the applicant's air quality consultant has ignored PM2.5 (concern about PM2.5 risk to cardiovascular mortality as an average of 5% of deaths in those aged over 30 can be attributed to PM2.5 air pollution);
- Concern about there being no measurement available of NO2 for the most relevant stretch of the A27 nearest the nursery;
- Concern about Council and Developer's reliance on modelled predictions re air pollution and the fact that the school and housing has not been monitored for a period of real time; and
- Concern that the modelled figures in the table 8-12 of the ES do not meet the standard recommended by WHO.

British Horse Society Access & Bridleways Officer – no objection in principle:

- Concerns about safety of equestrian users of the new link;
- Coombes Road West is used to connect to The Drive to Lancing College (Bridleway 2065) or riders travel on to the signalised crossing connection Coombes Road to Old Shoreham Road.
- Concern that the number of vehicles that may use Coombes Road (West) in the Transport Statement is an underestimate as it will include HGVs and farm traffic associated with several farms and business centre in Coombes Road;
- 20 mile an hour speed limit welcome but traffic calming measures (build outs, speed cushions) will be make horse riders feel vulnerable adjacent to passing vehicles;
- Cyclist bypass should be available for equestrian users;

Coastal West Sussex Economic Partnership – support:

- Significant benefits of the 4<sup>th</sup> arm include reduced journey times, travel distances and vehicle emissions for all Coombes Road users;
- Direct and convenient access to and from the A27 for Lancing College;

West Sussex Local Access Forum – comment:

- Consider that from perspective of non-motorised users, infrastructure improvements necessary for the whole development (New Monks Farm) offered the best opportunity to deliver a separate bridge crossing of the A27 to replace signalised Old Shoreham Road/Coombes Lane junction.
- WSLAF believe it is important when considering the 4<sup>th</sup> arm proposal that the works do provide protection and connectivity for all NMUs. Transport assessment considers walkers and cyclists but not equestrian users.
- Concerns regarding the overall NMu safety of the 4<sup>th</sup> arm as the road is narrow and will be used by larger vehicles, bringing NMUs in close proximity with vehicles and associated noise, fumes and hazard of close pass.
- Concern about NMUs needing to negotiate traffic calming measures, including speed cushions, kerb buildouts;
- NMUs desire lines are north/south and east/west with Coombes Road connected to several bridleways in the SDNP and connection to The Drive which is also a bridleway.

## 6. Planning Policy Context

- 6.1 Applications must be determined in accordance with the Development Plan, unless material considerations indicate otherwise. The statutory development plan is the **South Downs Local Plan 2019**.

### National Park Purposes

- 6.2 The two statutory purposes of the SDNP designation are:
- To conserve and enhance the natural beauty, wildlife and cultural heritage of their areas;
  - To promote opportunities for the public understanding and enjoyment of the special qualities of their areas.

If there is an irreconcilable conflict between these two purposes, conservation takes precedence. There is also a duty to foster the economic and social wellbeing of the local community in pursuit of these purposes.

### National Planning Policy Framework and Circular 2010

- 6.3 Government policy relating to National Parks is set out in English National Parks and the Broads: UK Government Vision and Circular 2010 and the National Planning Policy Framework (NPPF) (July 2021). The Circular and NPPF confirm that National Parks have the highest status of protection, and the NPPF states at paragraph 176 that great weight should be given to conserving and enhancing landscape and scenic beauty in national parks and that the conservation and enhancement of wildlife and cultural heritage are also important considerations and should be given great weight in National Parks.
- 6.4 The NPPF has been considered holistically in the determination of this application, although it is considered that the following sections are of particular relevance:
- Section 2: Achieving Sustainable Development
- Section 4: Decision-making
- Section 6: Building a strong, competitive economy
- Section 8: Promoting healthy and safe communities
- Section 9: Promoting sustainable transport
- Section 12: Achieving well-designed places
- Section 14: Meeting the challenge of climate change, flooding and coastal change
- Section 15: Conserving and enhancing the natural environment
- Section 16: Conserving and enhancing the historic environment
- 6.5 In addition to the above, it is considered that paragraphs 7, 8, 10, 11, 24, 38, 47, 55, 56, 57, 84, 85, 92, 100, 104, 105, 111, 112, 126, 130, 152, 154, 159, 167, 169, 174, 176, 178, 185, 186, 188, 189, 194, 195 and 203 of the NPPF are particularly relevant to the determination of this application.
- 6.6 Paragraphs 194 - 198 require the SDNPA to identify and assess the significance of heritage assets and to take account of the desirability of sustaining and enhancing this significance.
- 6.7 At paragraph 197, the NPPF states that in determining applications that affect heritage assets, local planning authorities should take account of:
- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

c) the desirability of new development making a positive contribution to local character and distinctiveness.

- 6.8 For the purposes of paragraphs 176 and 177, whether a proposal is 'major development' is a matter for the decision maker. The local planning authority considers the nature, scale, localised effects of the development and its location so close to major infrastructure are such that it will not have a significant adverse effect on the purposes for which the area has been designated or defined. This development does not therefore constitute 'major development' for the purposes of the NPPF.

Town & Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)

- 6.9 This application is also supported by an Environmental Statement as the proposals fall within the definition set out in Schedule 2, Infrastructure Project, 10(b) of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017.
- 6.10 As set out in the above mentioned regulations and the 'Planning Practice Guidance' which accompanies the National Planning Policy Framework, there are specific arrangements for considering and determining planning applications that have been subject to an Environmental Impact Assessment (EIA). This includes consideration of the adequacy of the information provided, consultation, publicity, and informing the public of the decision and the main reasons for it. The Local Planning Authority should take into account the information in the Environmental Statement, the responses to consultation and any other relevant information when determining the planning application. Further assessment of the submitted Environmental Statement is made in Section 7 of this report.

Development Plan Policies

- 6.11 The planning policies of the **South Downs Local Plan (SDLP)** of most relevance to the assessment of this application are:

- SD1 - Sustainable Development
- SD2 - Ecosystems Services
- SD4 - Landscape Character
- SD7 – Relative tranquillity
- SD8 - Dark Night Skies
- SD9 - Biodiversity and Geodiversity
- SD11 - Trees, Woodland and Hedgerows
- SD12 – Historic Environment
- SD16 – Archaeology
- SD17 – Protection of the water environment
- SD19 – Transport and accessibility
- SD20 – Walking, cycling and equestrian routes
- SD21 – Public realm, highway design and public art
- SD25 – Development strategy
- SD34 – Sustaining the local economy
- SD42 – Infrastructure
- SD45 - Green Infrastructure

- SD48 – Climate change
- SD49 – Flood risk management
- SD54 – Pollution and air quality

#### The South Downs National Park Partnership Management Plan

- 6.12 The Environment Act 1995 requires National Parks to produce a Management Plan setting out strategic management objectives to deliver the National Park Purposes and Duty. National Planning Policy Guidance (NPPG) states that Management Plans “contribute to setting the strategic context for development” and “are material considerations in making decisions on individual planning applications”. The South Downs Partnership Management Plan, as amended for 2020-2025 on 19 December 2019, sets out a Vision, Outcomes, Policies and a Delivery Framework for the National Park over the next five years. The policies of most relevance here are numbers 1, 2, 3, 4, 5, 6, 9, 11, 13, 19, 24, 28, 32, 37, 40, 45, 47, 48, 49, 52 and 54.

#### Roads in the South Downs (June 2025)

- 6.13 Through this document, SDNPA recognises the need for a more consistent approach to highway design, one that responds to the specific priorities and objectives of the designation. A greater recognition of local context and place, combined with an increasing emphasis on walking, cycling and sustainable transport, are themes consistent with good highway management across the country.
- 6.14 The guide recognises and highlights the key role played by roads and highways in forming the immediate foreground for most visitors to the Park, and the important influence played by legislation, duties and policies for road design in determining expectations, driver behaviour and values. The guide sits under the Protocol for the Management of Highways in the South Downs National Park agreed with the four Local Highway Authorities (LHAs), Highways England and the SDNPA. It sets out a vision for ‘a highway network that is managed and maintained in such a way that it conserves and enhances the South Downs outstanding landscape quality and local distinctiveness whilst delivering a safe and convenient network for all users and modes of transport’.
- 6.15 An assessment of the application against this guide is given at Section 7 below.

#### Draft Design Guide Supplementary Planning Document

- 6.16 This document is a draft and currently out to public consultation. It therefore has limited weight in decision making.

## **7. Planning Assessment**

- 7.1 The main issues for consideration are:

- Principle of development;
- Landscape-led design;
- Trees, ecology and biodiversity;
- Highway, PROW and NMUs
- Residential amenity;
- Air quality;
- Drainage/flood risk;
- Ecosystems Services.

- 7.2 The design of the scheme is considered within each of the above sections. This is in line with the landscape-led and ecosystem services policies of the Local Plan.

#### Principle of Development

- 7.3 The application site straddles two local planning authorities: the northern section of the development is within the South Downs National Park and the southern section in Adur District. The proposed link road itself breaches the administrative boundary line (see Figure 1 above). The planning application for the proposed link road has been submitted in response to the approved New Monks Farm development of 600 houses and non-food retail store in the neighbouring district of Adur which results in changes to Coombes Road (east) junction to left-in/left-out, necessitating a diversion to Shoreham Flyover to travel west bound, along with the loss of the signalised and 'at grade' pedestrian crossing.
- 7.4 Adur Planning Committee considered the application for the proposed link road on 19th July and resolved to grant planning permission subject to the requirements of a legal agreement to secure off site mitigation and enhancements to be agreed with the SDNPA.
- 7.5 The application is accompanied by an Environmental Statement (ES), in accordance with the Town & Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended). This describes the 'Environmental Impact Assessment', which assesses the potential environmental effects of the development during the construction and completed scheme (beneficial or adverse), the degree of impact, and mitigation measures to avoid, reduce or offset negative impacts. The issues covered are set out below and discussed further in this report:
- transport and access;
  - noise and vibration;
  - air quality;
  - water resources;
  - ecology and nature conservation;
  - landscape and visual.
- 7.6 Heritage and archaeological impacts have been 'scoped out' of the Environment Impact Assessment (EIA), albeit these matters are considered more generally under the planning regime. This position is accepted by conservation and archaeology officers. The 4th arm would be contained within the north easement of the A27 carriageway constructed in the 1960s, and there is unlikely to be any below-ground archaeological remains present in this area. Similarly, Coombes Road (West) was part of a minor road to Coombes until the formation of the A27 Shoreham Bypass in the 1970s and the reuse of this existing road means there is negligible potential for significant impact to below-ground archaeological remains. On this basis, it is accepted that heritage and archaeological impacts should be scoped out.
- 7.7 As identified in the supporting information and confirmed by the SDNPA's Conservation Officer, Coombes Road (west) appears on the historic maps dating back to the late 18<sup>th</sup> century. It appears to have been part of an historic route which ran down from Coombes, past Pad Farm and south west towards Lancing. The former historic rural road has long since been severed by the A27, with only this stub, or remnant, remaining. As confirmed by the SDNP Conservation Officer, it is difficult to get a sense of the antiquity of the road on site, unlike Coombes Road further north. On this basis the proposal is not in conflict with policy SD21.
- 7.8 It is considered that the likely environmental impacts of the development have been adequately assessed in the ES and, subject to the imposition of appropriate conditions to

secure the mitigation measures, are considered acceptable. The various chapters of the ES are addressed further in the following paragraphs.

- 7.9 The Environment Statement which sets out appropriate mitigation for noise and dust (and associated reduction in air quality during the construction phase due to dust) and suggests that the proposal will have a negligible adverse effect on air pollution concentrations at sensitive receptors - particularly those residents along Coombes Road (west) given their existing proximity to the A27 - and would remain well within established Air Quality standards, complying with Policy SD54.
- 7.10 The proposal retains the NMU connectivity approved as part of the NMF applications, save for a length of carriageway along the new link road which would require cyclists to join the carriageway for approximately 200m. This would be in a relatively low speed environment considered by West Sussex local highways authority to be more beneficial than continuing off-carriageway along a route that would be interrupted by direct access points to the nursery and existing residential properties along Coombes Road (west). Thereafter, the NMU route for cyclists reflects that of the approved scheme. The extended NMU route between Footpath 2049 and Coombes Road (east) is enhanced by the closure of the junction to vehicular traffic and the addition of tree and understorey planting.
- 7.11 The application would not provide any additional public access connectivity although it will result in further physical separation from the A27 for pedestrians and cyclists. The landscaping between the A27 and the link road would provide an enhanced experience to users as well as serving to indicate a change in the road character and provide other ecosystem services. The closure of Coombes Road (east) will result in a reduction of vehicles using The Drive and Coombes Road (east) to join the A27 which will be of benefit to NMU users (pedestrians, cyclists and horse riders) seeking to access the bridleway from the east.
- 7.12 It is recognised that Lancing College plays an important role in the South Downs area as the custodian of significant heritage assets in the form of Listed Grade I, II and II\* buildings, Estate business operations including Lancing Farm and Lancing Equestrian Centre, open spaces, woodland and public rights of way contained within the 550 acre Estate. The College contributes to the social, economic and environmental wellbeing of the area as a significant local employer and through its engagement works with the local community, in particular school and community groups (SD34).
- 7.13 The consented NMF development provides for a 3 arm roundabout and includes the closure of the Sussex Pad and 'at grade' crossing, with vehicular traffic diverted to the Shoreham Flyover. It is suggested this would also lead to an increase in traffic on the A27 with all vehicles at the Coombes Road junction required to turn eastbound regardless of their ultimate destination, leading to potential congestion during school peak hours and additional carbon emissions (SD19, SD54).
- 7.14 Information supporting this application suggest that increased journey distances and perceptions of increased physical severance and safety could have the effect of deterring prospective parents, staff and other college users, which would result in long-standing implications on the ability of the College to meet all of its obligations.
- 7.15 Similarly, the supporting information suggests the direct benefit of the 4th arm includes a reduction in journey times, journey costs, fuel related emissions and a perception of highway safety by offering all users of Coombes Road a more direct link to the A27 without the need to detour east.
- 7.16 Negotiations with the applicant during the process of this application have resulted in a package of enhancements. The arable field to the north of the site will be moved from wheat crop to species rich grassland (following a transitional period) and would be subject to a long term appropriate management plan to be secured through a legal agreement. This

enhancement will provide significant biodiversity net gain, the exact figure still to be calculated at the time writing, and provide suitable reptile mitigation. In this respect the proposal mitigates for the impacts of the development in addition provides measurable enhancements in accordance with purpose one: to conserve and enhance.

- 7.17 It is recognised that the proposal will have a negative effect on the outlook of those residential dwellings along Coombes Road (west) and they will experience increased vehicle movement along Coombes Road (west) particularly at peak periods at the beginning and end of the school day. However, the road's design and geometry would ensure speeds generally below 30mph, with speed control bends, build out and pinch points. The footway, timber bollards and pinch point adjacent to these dwellings would separate them from vehicles while retaining an appropriate carriage width to allow for larger vehicles to access Coombes Road to the north.
- 7.18 The proposal demonstrates the development will not cause harm to archaeological heritage assets (SD16), results in significant Biodiversity Net Gain (SD9) created through mitigation planting which also provide a SuDS function (SD17, SD50) and creates new reptile and wetland habitats (SD9, SD11, SD45).
- 7.19 Therefore, on balance, the principle of the development is considered acceptable and in accordance with the NPPF, South Downs Local Plan policies.
- 7.20 Further consideration of the details of the application are set out in the following paragraphs.

#### Landscape-led Design

- 7.21 The site falls within 2 landscape character areas: 'Adur Floodplain' and 'Adur Valley Sides', which have characteristics of, in the case of the former: flat landform and of large and expensive scale, pasture land cover, far reaching views over open floodplains. Contains the meandering course of the tidal River Adur (SSSI); general absence of settlement, woodland and low incidence of trees due to large scale open landscape; tranquillity affected by proximity to built development and the A283 and A27.
- 7.22 In the case of 'Adur Valley Sides', key characteristics are chalk valley sides, pasture, chalk grassland and woodland on steeper slopes, extensive road network including A283 on the eastern valley side and Coombes Road in the western valley side. Key landmarks include the prominent Gothic chapel of Lancing College and Chimney of Shoreham Cement Works.
- 7.23 The supporting LVIA to the planning application suggests the site's landscape quality to be of low quality and weak, given its current land use as an existing trunk road with engineered embankment. It suggests it contains minimal numbers of landscape features worthy of retention, and a lack of management intervention has resulted in a degradation of these features. The site contains a number of detracting features associated with its function as a highway including signage, barriers and hard landscaping. The visual sensitivity is described as low to medium. However, as the SDNPA Landscape Officer states, the current poor condition and existing negative effects resulting from the proximity to the A27 are not considered justification for further erosion.
- 7.24 During pre-application discussions in 2018 (SDNP/18/01057/PRE), officers expressed concern regarding the potential landscape character and visual impacts of a link road, and identified the need for a landscape-led approach to the development to include a study of the landscape baseline conditions, biodiversity, land use and perceptual characteristics.
- 7.25 The supporting Design and Access Statement details all options considered in response to those points. This includes:
- Direct connection from A27 via a 4th arm to the consented roundabout running parallel to the A27 and connecting directly into Coombes Road (east). However, Highways England has maintained a clear and consistent stance that any additional access to the trunk road network would require the closure of Coombes Road (east). This option



was also rejected due to the length of hardstanding required – the longest of all options, with additional tree loss and a requirement to cross services near to Combes Road and the Drive which might make construction unviable;

- Direct connection to Lancing College along rising land agricultural grassland to the north of the A27. This option was rejected as it would result in a number of significant negative impacts on landscape character, visual impact, impact on Bridleway 2065 and partial removal of an adjacent woodland copse.

- 7.26 The third option, which forms the basis of this planning application, was considered to result in the least impact on landscape character and visual impact, required less hard surfacing and provide more opportunities for additional and replacement landscaping, increased green connectivity and biodiversity net gain opportunities.
- 7.27 The Landscape and Visual Chapter of the ES suggests the development would have a limited impact on the overall landscape character given its location adjacent to the consented A27 roundabout and carriageway realignment.
- 7.28 In terms of operational visual effects (changes to views apparent on day 1 and at year 15), the report summaries these to be “locally moderate magnitude on mostly low and medium sensitivity receptors and one high sensitivity receptor”. At year 15 as the landscaping matures, there would only be “neutral/minor adverse effects or less on all receptors”.
- 7.29 The report identifies the main impact would be at the point at which the link road connects to the approved NMF roundabout which would require earthworks and vegetation removal (considered by the SDNPA Tree officer to consist of low grade trees and a laurel hedge). As the proposed replacement and additional landscaping and tree planting matures this would result in a neutral/minor adverse effects or less on receptor. More detail on additional planting is set out below.
- 7.30 The Landscape and Visual Addendum updated following amendments to the road design and proposed tree planting, concludes that taking account of the native woodland species tree and shrub planting and the addition of wildflower planting including the area would deliver important ecosystem services benefits. This would provide a moderate beneficial impact as a result of the changes to the existing Coombes Road junction with the A27, while creating a route which is rural in character.
- 7.31 The amendments to the road design, which are informed by guidance in ‘Roads in the South Downs’, would help to promote slow speeds and remove extraneous clutter (white road markings, speed cushions, lighting, signage etc) to create a road which is predominantly rural in character away from the roundabout and one that marks the transition into the South Downs National Park. The SDNPA Landscape Officer acknowledges these positive amendments which remove urban/suburban elements which would otherwise undermine the distinctive qualities of the NP.
- 7.32 It is considered that the package of landscape enhancements associated with the arable field immediately north of the site would provide significant landscape, biodiversity and ecosystems services benefits.
- 7.33 In conclusion, it is considered the amended proposal would minimise the impact of the development on landscape character and that the development itself would be of an acceptable appearance within the context of the site. In the long term, the proposed landscape strategy, with replacement and additional native woodland trees, planting along the northern edge of the site and at the junction with Coombes Road and the A27, and planting between the proposed link road and the A27 carriageway would minimise the visual effects of the new road. The enhancements proposed at the field north of the site would improve GI and connectivity and provide a species rich and biodiverse landscape response which accords with the requirements of policies SD2, SD4, SD9 and SD11.

### Trees, Ecology and Biodiversity

- 7.34 The Planning Statement states the proposal would result in the removal of 2,128sq.m of trees and scrub vegetation, primarily formed of highway verge and embankment planting at the edge immediately north of the A27 where the proposed road cuts into a small area of the engineered bank.
- 7.35 Tree removal consists mainly of low-grade trees (Sycamore, Hawthorn, Dogwood, Common Yew, Field Maple, Common Ash). The SDNPA Tree officer confirms this consists of low grade trees and a laurel hedge.
- 7.36 In its place, 2,522sq.m of new woodland, individual trees, shrub and grassland planting is proposed along the northern edge of the existing vegetated bank and between the new link road and realigned A27. The existing hard surfacing along the A27 between Coombes Road (west) and (east) would be replaced with grassland planting. Also along this section, the hedge would be bolstered and areas of shrub and tree planting included.
- 7.37 The hard standing at the junction of the A27 into Coombes Road (east) will also be replaced by native trees, shrub and grassland species, and a laurel hedge at the entrance to Coombes Road (west) would be removed and replaced by a mixed native hedgerow.
- 7.38 A wetland grass mix would to be used in the swale (at the western end of the strip of land between the two carriageways) to aid flood risk and water quality. Trees would be introduced to this area to provide visual mitigation, biodiversity enhancements, air pollution and water absorption.
- 7.39 The application is supported by a number of ecological reports which form part of the ES. The results of the reptile survey suggested 'low' populations of common lizard and 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'. Special consideration needs to be made to reptiles within the proposal to ensure their continued favourable conservation status.
- 7.40 It was initially proposed that suitable reptile habitat would be provided between the two carriageways. Whilst there was no objection to the standard of mitigation, concerns were raised by officers and consultees alike regarding the connectivity and the provision of long term future management of this land, which is controlled by Highways England.
- 7.41 In order to address these concerns, reptile habitat will be provided at the field north of the site which forms part of the enhancement package. The majority of the reptile population was found along the arable field boundary to the north, and the tussocky field margins (e.g. wildflower or species-rich grassland) along the boundaries is considered to be much more suitable for reptiles than the previously proposed sections of land between the two carriageways.
- 7.42 An acceptable updated Reptile Mitigation Strategy has been provided and this will ensure the protection of individuals, whilst securing their long-term viability. A habitat management strategy will be secured along with the enhancement by way of S106 legal agreement.
- 7.43 Representations have raised concerns that the removal of trees and scrub will worsen flooding problems in the area. However, the proposal includes additional replacement planting, including an additional 10m deep strip along the site boundary north of the retained highway verge planation. Further tree planting is proposed around the swale between the carriageway to aid water absorption. Surface water drainage conditions have been provided by the LLFA/West Sussex Drainage Engineer.
- 7.44 Consultations responses for ecology include the requirement to soft fell trees which have been identified as having (low) potential for roosting bats, along with compensatory planting and a sensitive lighting strategy. The mitigation strategy set out the ES would be required by condition.

- 7.45 The supporting badger monitoring survey indicates the holes affected by the development were not used by badgers, however, given their known presence in the area and mobile nature, the requirement to undertake an updated site walkover be carried out prior to commencement of development would be secured by condition.
- 7.46 Sussex Wildlife Trust comments about clarity need around biodiversity gains and losses have been addressed in the updated Ecosystems Services Statement, Grassland and Reptile Habitat Map – Existing and Proposed (dated April 2021) and the ‘Additional Habitat Enhancement and Creation’ drawing no. HED-1172-LA-705.
- 7.47 Conditions including the provision of a Construction Environmental Management Plan (CEMP) and Landscape and Ecology Management Plan (LEMP) respond to Natural England and the Environment Agency comments about the need to secure the mitigation measures set out in the ES to prevent impacts from the construction and operation of the proposed development are necessary to protect the species interest and features of the Adur Estuary SSSI.
- 7.48 Mitigation to prevent water pollution from suspended sediments, hydrocarbons, concrete and cement of measures to prevent impacts from dust and air pollution during construction are sufficient and would be secured through the CEMP required by condition.
- 7.49 As submitted, the proposal with the replacement and additional tree, grassland and scrub planting (replacing trees lost along the highway verge and embankment, and hardstanding) resulted in a biodiversity net gain of 22.5%. The additional enhancement in the form of the north field - area of approximately 19 hectares – to move from crop to species rich grassland and secured along with appropriate habitat management for 30 years will significantly increase the biodiversity net gain and represents a genuine enhancement. The precise percent increase has yet to be determined but the proposal is considered to accord with the requirements of Policy SD9 in this respect.
- 7.50 In conclusion, it is considered that the ES sets out acceptable mitigation for protected species and provides an overall increase in trees and landscape above what would be lost to the construction of the road with a biodiversity net gain as submitted of 22.59%.
- 7.51 The addition of the enhancement package at Hoe Court Farm field immediately north of the site, transitioning from arable to native rich grassland species, would provide valuable biodiversity benefits. This would include habitat creation, improved GI connectivity and significant biodiversity and other ecosystem services benefits, including the potential to reduce field water run-off onto the highway. This should also be viewed in the context of 7.23 to 7.32 above in terms of overall landscape enhancement and a holistic approach to the site and surroundings.
- 7.52 On this basis, it is considered that the proposal accords with policies SD2, SD9 and SD11 of the SDLP.

#### Highways, PROW and NMUs

- 7.53 SDNPA officers, West Sussex highways authority and Highways England raised initial concerns about the design of the link road and the justification for the 20mph speed limit which brought with it much of the traffic calming measures (speed cushions, road markings, signage, lighting etc).
- 7.54 Following further negotiation with the applicants’ highways consultants, amendments have been provided which have been informed by the guidance set out in ‘Roads in the South Downs’. These include identifiable changes in the character of the route as it transitions from the strategic road network at the section adjoined with the A27 roundabout to be adopted by Highways England to the local highway network adopted by West Sussex. A gateway feature (build out) signals the change in character and at that point cyclists would join the road from the shared foot/cycle path with the narrower 2 metre footway continuing to Lancing College.

- 7.55 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, in 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.
- 7.56 The typically urban traffic calming measures have largely been removed in favour of increased tree planting and soft verge landscaping. Granite sets have been introduced to mark the transition from character areas or sections of the road. Tree planting within the build out and between the carriageways, along with curves either side of the road at the Nursery entrance and at the junction with The Drive, acts as a natural speed control ensuring general speeds are below 30mph.
- 7.57 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. Timber bollards and extended footway marked by the alteration of materials alongside the Coombes Road (West) properties will provide additional separation from the road that is rural in character and will visually narrow the road indicating to drivers that the nature of the road has changed. The road narrowing together with the treatment of footway and timber bollards will help reduce the traffic speeds but still allow the width of road to enable larger vehicles to navigate successfully.
- 7.58 The amended road design and removal of the 20mph speed limit controls enables the lighting requirements to be limited to that required by Highways England on the approach to the A27 roundabout. This lighting will be appropriate to a dark skies location following the guidance in Dark Skies Technical Advice Note 2 (May 2021) with details controlled by condition.
- 7.59 The SDNPA Landscape officer identifies lighting as having negative impact upon perceptual qualities of the area and one that has the potential to be felt further into the NP. However, lighting is kept to a minimum and is only proposed close to the roundabout (with the majority of the new road being unlit) in order to meet the safety requirements of Highways England. Furthermore, the approved NMF 3arm roundabout provides safety lighting at the junctions of the roundabout. The additional lighting proposed as part of this application is not considered materially harmful compared to that which is already approved as part of the NMF scheme. The lighting is also not considered unreasonable in principle given the roundabout's function on the strategic road network.
- 7.60 It is not considered that the proposal would materially increase vehicle movements or encourage 'rat-running' but rather transfer journeys from Coombes Road (east) to the proposed link road. The movements will 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 of the order of 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 expected to be fairly lightly trafficked (as Coombes Road (east) currently is) with an average of 1-2 vehicles per minute on the new road.
- 7.61 In terms of the issue of queueing traffic potentially affecting the pinch point in the new road this is considered extremely unlikely. The new link road would have a length of approximately 330 metres which could accommodate approximately 57 vehicles before it reaches Lancing Nursery providing more capacity than currently exists at Coombes Road (east).
- 7.62 In addition, the observed delays and queues occasionally experienced at the current Coombes Road (east) 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 queuing or delays on the Fourth Arm. This has been reviewed by HE and WSCC who are in agreement with this conclusion.

- 7.63 Overall, it is considered that these alterations positively respond to the comments raised 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.
- 7.64 The revised plans have been considered by an Independent Safety Auditor to address the concern raised about highway safety issues and ease of access through the 'residential zone' and are now supported by both Highway Authorities. The rural nature of Coombes Road is likely to deter most from using this as a viable route to any commercial uses at New Monks Farm or the airport.
- 7.65 Representations have queried the validity of the traffic data presented in the submission and whether it is truly representative given the Covid restrictions at the time the application was submitted. The Transport Assessment confirms that the baseline traffic data used throughout is based on traffic data used for the A27 as part of the New Monks Farm and Shoreham Airport applications, traffic flow data commissioned by Highways England in relation to improvements along the A27 corridor and junction turning count data (weekday mornings and evening peak periods) from 2015. The data has been updated and supplemented by new surveys carried out in January and February 2020, prior to the Covid 19 work from home guidance and lockdown restrictions. Highways England and local highway authority are satisfied with the data and traffic modelling used.

#### Non-Motorised User Connectivity (NMU)

- 7.66 Coombes Road (East) junction will be stopped-up and landscaped. The approved new NMU footpath/bridleway between footpath 2049 and Coombes Road (East) running parallel alongside the A27 northern boundary will continue through this area joining the remainder of the tarmacked section of Coombes Road. The route north along Coombes Road allows NMUs to turn into The Drive (section 4 above) before linking to Public Right of Way (Bridleway) 2065 running west and linking up to the existing public rights of way network, or continuing westbound along the new link road.
- 7.67 Supporting information (Highways Note 2) suggests the overall provision for NMUs is not altered by this application and this is supported by diagrams detailing the consented NMU routes and those proposed as part of this application. The equestrian, cycleway and pedestrian user routes remain as approved with the NMF development. The existing footway on the A27 with a bus stop at Sussex Pad is removed and pedestrians and cyclists are directed away from the A27 northwards along Coombes Road (West) and the Drive, before continuing either north along Coombes Road or south along the approved NMU.
- 7.68 A benefit of the proposal is that the section of foot/cycle way along the proposed link road will be further separated, both physically and visually, from the A27 carriageway, improving the perceptual and experiential qualities of the route into the South Downs.
- 7.69 Third party public representations are split between opinions that the scheme lacks safe and convenient crossing points for NMU users; that it is a barrier to NMUs accessing the National Park; is an inconvenient diversion and places vehicular use above other more sustainable forms of transport. On the other hand, the supporters suggest the link road addresses the negative impact of the changes proposed to Coombes Road (east); provides safe points for non-motorised users to access the South Downs National Park, via the signalised crossing on the roundabout and the approved NMU link along the west bank of the Adur. Undoubtedly, some of the objections raised and indeed the support received is coloured by the original New Monks Farm planning permission and those approved alterations and diversions imposed by the closure of the Sussex Pad.

- 7.70 Some representations therefore are not specifically confined to new issues raised by this application rather than a second opportunity to address NMUs and connectivity issues associated with the original NMF development applications has been missed.
- 7.71 Both Cycling UK (Brighton and Hove) and Sustrans highlight the need for cycle routes to be continuous and direct. In this respect, the proposal reflects the approved scheme and the NMU routes are unaffected by the link road.
- 7.72 Concern has been raised regarding the need for cyclists to join the carriageway midway along the new link road (approx. 160 m from the roundabout). This concern was highlighted in the Road Safety Audit Response (dated 21 May 2021) in which it is suggested an off carriageway cycle route should continue along the link road. However, the County Highways Authority states that based on low vehicle flows and the 30mph speed limit rejoining the carriageway is acceptable. This also applies to westbound cyclists who will be required to cross the link road to re-join the path. It is suggested that signage will be provided to direct cyclist between the off-road provision and the carriageway.
- 7.73 Much of the concern raised over the traffic calming and management measures, including the requirement for this to be illuminated for cyclist safety, has been addressed in the amended plans where the number of buildouts have been reduced and the speed cushions removed. This approach is considered acceptable by the County Highway Authority, who will ultimately be responsible for the road.
- 7.74 No change in route occurs for equestrian users compared to the approved scheme. However, the closure of the Coombes Road (east) junction and the first section of landscaping will remove vehicle traffic from this section. Beyond this, the carriageway is retained as it provides access to Pad Farm and the former Riccardo test track.
- 7.75 Traffic flows along The Drive are expected to decline with the majority of the traffic associated with Lancing College and Little Lancing expected to turn west and use the proposed link road following the closure of Coombes Road junction. The traffic data presented in the submitted Transport Assessment suggests peak hour vehicle movements of 257 and 182 morning and evening respectively along this section for the consented NMF development application compared to 64 and 55 peak hour vehicle movements associated with this application. The width of the road at this point is unchanged.
- 7.76 Similarly, the reduction in vehicular traffic along The Drive and Coombes Road (east) will benefit pedestrians accessing the SDNP via the consented NMU connecting the existing PRoW Ref: 2049 (see relevant planning history above) along the banks of the River Adur beneath the A27. A footway is provided throughout the route other than The Drive which does benefit from wide and accessible verges.
- 7.77 Two sections of the proposed route see an increase in vehicular traffic and two a suggested decline. The data is provided in the Transport Assessment and compares the NMF development and third arm roundabout with the new link road and 4<sup>th</sup> arm options. The new link road will take Coombes Road and Lancing College traffic off the A27 at the new roundabout. Coombes Road (west) will no longer operate as a cul-de-sac serving Little Lancing Nursery and a cluster of residential dwellings, but will see an increase in two way traffic associated with Lancing College and the commercial and residential properties along Coombes Road. Transport Assessment data suggests Coombes Road (West) would experience peak hourly vehicle movements of 28 (am) and 40 (pm) based on the NMF third arm options compared to 257 (am) and 183 (pm) modelled for this application.
- 7.78 The provision for NMU remains unchanged from the consented scheme on the whole with localised improvements where vehicular traffic is removed (ie Coombes Road junction and The Drive). A footway is secured along the length of the link road and Coombes Road (West) which gives access the PRoW (bridleway 2065). Cyclists will need to rejoin the carriageway along a section of the new link road prior to entering into Coombes Road

(West). Whilst there is no material improvement to the overall NMU connectivity in the area, and no new linkages proposed, the scheme does not change the provision secured as part of the New Monks Farm.

- 7.79 It is considered that the scheme does not present a highway risk to NMU users nor is it considered detrimental impact to highway safety.

#### Residential Amenity

- 7.80 Coombes Road (west) is currently a non-through public highway and provides access for a cluster of residential dwellings and the former Sussex Pad Hotel, now Little Lancing children's nursery. The traffic on that road is therefore limited to that associated with the dwellings themselves and that of Little Lancing nursery.
- 7.81 The proposal will impact on the residential amenities of these neighbours as the only traffic currently affecting the existing residential properties is generally associated with the children's nursery. The outlook will change from a cul de sac, no-through road.
- 7.82 The applicants have undertaken a comprehensive noise assessment the conclusions of which have been supported by the Adur Environmental Health Manager. The key issue is that the existing properties already suffer from road noise in light of their proximity to the A27 – within approximately 40m south of Little Lancing and 200m from the entrance to the Drive.
- 7.83 The supporting noise assessment states that the closer proximity of traffic resulting from this proposal, at lower speeds is likely to result in a negligible increase in noise.
- 7.84 Adur's Environmental Health officer states that this is not to say 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.
- 7.85 On this basis, and given the proximity of the adjacent A27 strategic highway to these properties, the intervening character of the area, and whilst acknowledging the change in the access arrangements is significant, it is not considered to result in a level of harm that would justify refusing planning permission on noise grounds.
- 7.86 Concern has been raised about the impact of vibration on the properties along Coombes Road (west). The ES notes there is no evidence to suggest that significant vibration effects would result from piling activities, a point agreed by Adur's EHO. The likely magnitude of impacts arising from piling could be determined by carrying out 'trial piles' and recording the vibration impacts at a point representative of the nearest receptor. This can be secured through the Construction Management Plan.
- 7.87 Operational vibration effects have been scoped out of this the ES, given this will be a new smooth road surface, and maintained free of irregularities. Furthermore, it is suggested that low numbers of HGV traffic (less than 1% of predicted flow) and low traffic speeds closest to sensitive receptors (Coombes Road (West) properties and Little Lancing Nursery) will not give rise any adverse vibration effect. The ES concludes that there are no vibration impacts associated with the operation of the 4th arm link road; a view supported by Adur's EHO.
- 7.88 In response to concerns raised by local residents relating to the age of these properties and the impacts on vibration on foundations, further supporting information in the form of a 'Traffic Vibration Effects' report (Vanguardia, No: 103574 18.6.21) has been provided. This report sets out the current guidance in the context of the proposed development and reiterates that the volume and type of vehicles, and the slow traffic speeds along Coombes Road (West) induced by narrowing the road to 4m with timber bollards, and new road surface means vibration from road traffic is very unlikely to cause any adverse effects on amenity and/or structural damage to buildings.
- 7.89 Other objections relate to loss of parking as residents along Coombes Road (west) have for many years enjoyed informal off-plot parking directly outside these properties, and in places

the grass verge gives way to a wider tarmac carriageway. However, whilst this will represent a change for these residents this is not considered in itself to justify the refusal of planning permission.

- 7.90 The local highways authority is satisfied the revised plans allow for service vehicles to deliver without blocking the flow of traffic.
- 7.91 Lancing College has offered parking for residents at the rear of Little Lancing Nursery at weekends, but this would need to be a private agreement between the parties.
- 7.92 It is acknowledged that the proposal will lead to a moderate loss of residential amenity to some properties. Notwithstanding it is considered there is a lack of clear evidence to substantiate sufficient harm to amenity to justify refusing planning permission.

#### Air Quality

- 7.93 Concerns have been raised by AREA and other third party representations 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.
- 7.94 The applicant's Consultants have provided a rebuttal to AREA who accepts that NO<sub>2</sub> disperses quickly 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.
- 7.95 Phlorum the Air Quality Consultants state 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. It 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.
- 7.96 Phlorum's assessment concludes 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".
- 7.97 The ES recognises that the construction phase will likely involve activities that could produce dust emissions, odours, gases and particles, which could impact on human and ecological receptors. It suggests damping down dust sources and covering of loose materials to reduce dust disposition. Measures to minimise the noise (and vibration) generated by the construction process could include hours of work, details of noise mitigation barriers, details of piling including details of the trial piles and recorded vibration impacts. This mitigation would form part of a wider Construction Environmental Management Plan (CEMP) secured by condition.
- 7.98 In conclusion, given the findings of the Air Quality chapter of the ES and the supporting information provided by the applicant's consultant, it is considered there are no grounds to resist this application on air quality grounds.

#### Drainage/Flood Risk:

- 7.99 The application is supported by a Flood Risk Assessment and drainage strategy which states the drainage system for the link road will connect to the consented drainage system for the NMF development. Surface water drainage will run into the swale between the two carriageways where it will feed into a piped channel south of the site and onto the pumping station approved as part of the NMF application.
- 7.100 The applicant's Drainage Consultants have discussed the proposals in depth with the Lead Local Flood Authority (LLFA), Adur's Drainage Engineer and Highways England to address initial concerns raised and to ensure that the overall drainage solution for NMF will alleviate



some of the historic flooding issues on this section of the A27 and that the proposed development would not increase flood risk.

- 7.101 A number of third party concerns have been raised regarding flood risk and drainage. The LLFA is satisfied that part of the historic flooding problem has been the lack of maintenance of highway drains and comments further that the NMF developer has been able to clear a number of blocked ditches adjacent to the A27 to ease this situation.
- 7.102 In conclusion, there is no objection from the statutory consultees on drainage and flood risk subject to conditions set out in section 10 of this report.

#### Ecosystems Services

- 7.103 In compliance with Policy SD2, the application is supported by an Ecosystems Services Statement (updated April 2021). In a simple but effective map form, the Ecosystems Services Statement (ESS) draws together information set out in supporting documents (see Appendix 2).
- 7.104 The statement illustrates the use of a green SuDS swale between the A27 carriageway and the new link road. It details the choice of planting to create additional wetland habitat and tree planting to aid with water absorption. Additional planting along the north side of the A27 and the north side of the new link road provide visual mitigation and opportunities for biodiversity enhancements. Where additional planting occurs, tree species have been selected for their ability to reduce air pollution, and includes understorey and grassland layers. Non-native hedge species will be replaced by mix native species and existing native species bolstered where required.
- 7.105 Separating the foot/cycle way from the main carriageway of the A27 as it follows the line of the new link road is considered to improve user experience, further enhanced by the planting between the carriageways.
- 7.106 The ESS illustrates where hardstanding is removed (Coombes Road junction area) and is replaced by tree, shrub and grassland planting, creating connectivity between the vegetation to the east and west of Coombes Road junction.
- 7.107 The application is also supported by a Biodiversity Net Gain (BNG) calculation which demonstrates a positive BNG of 22.59%. However, this does not take account of the significant increase in biodiversity which would be delivered by the proposed enhancement which would see the field north of the site at Hoe Court Farm reverting from arable to species rich grassland.

### **8. Conclusion**

- 8.1 In conclusion, it is considered that the proposal has been informed by a landscape-led approach with other options considered and discounted for landscape harm reasons. The proposed mitigation and enhancement measures are appropriate to the landscape character of the local area.
- 8.2 It is considered that the proposal which includes new and replacement planting (trees, shrubs and grassland/wildflower species) and the enhancement package on the adjacent field at Hoe Court Farm would compensate for the localised impacts on landscape character and minimise longer term visual impact of the 4<sup>th</sup> arm and link road. The proposal would not therefore have a detrimental impact on the character of the wider area and it would conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park.
- 8.3 Similarly, it is considered that the proposal and enhancement package would create new habitats, deliver increased GI connectivity and result in significant biodiversity net gains and other ecosystem service benefits. In this respect, the proposal includes opportunities to conserve and enhance the special qualities of the National Park.

- 8.4 Where concerns have been raised by statutory consultees, these have been overcome by the submission of supplementary information and, in the case of highways and landscape concerns, acceptable and appropriate amendments informed by SDNPA published guidance.
- 8.5 It is also considered that the likely environmental impacts of the development have been adequately assessed through the Environmental Statement (and its addendums) and the conditions recommended below would secure appropriate and acceptable mitigation and enhancement measures to conclude that the overall scheme would not cause significant harm or have any significant adverse impacts.
- 8.6 It is acknowledged that the proposal will lead to a moderate loss of residential amenity to some properties. Notwithstanding this, it is considered there is a lack of clear evidence to substantiate sufficient harm to amenity to justify refusing planning permission. This is balanced against the benefit to the wider community, the experiential improvement to the approved NMU, the landscape and ecological mitigation and the benefits from BNG, which weigh in favour of the proposal.
- 8.7 It is considered, on balance, that the proposed development is acceptable and accords with the relevant National Planning Policy Framework policies, the South Downs National Park Partnership Management Plan and the South Downs Local Plan 2019.

## **9. Recommendation and Conditions**

- 9.1 It is recommended that planning permission be approved subject to the following conditions and a legal agreement to secure the provision of the package of enhancements and mitigation (land to the north of the site at Hoe Court Farm) and a Deed of Variation to a legal agreement attached to consented scheme SDNP/18/00434/FUL for provision of a new footpath/bridleway alongside the A27 northern boundary.

## **10. Conditions:**

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).

2. The development hereby permitted shall be carried out in accordance with the plans and documents listed below under the heading 'Plans and Documents referred to in consideration of this application', unless otherwise agreed in writing by the Local Planning Authority.

Reason: For the avoidance of doubt and in the interests of proper planning.

### Contaminated Land

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 desk top study, site walkover, production of a site conceptual model and a human health and environmental risk assessment.

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

4. If the Phase 1 report, as required under Condition 3, 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: To ensure that no unacceptable risks are caused to humans, controlled waters or the wider environment during and following the development works.

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, what is to be achieved and any ongoing monitoring shall be specified. A competent person shall be nominated by the applicant to oversee the implementation of the Remediation Scheme. Thereafter the approved remediation scheme shall be fully implemented in accordance with the approved details.

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

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.

#### Drainage

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 any such 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. 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 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) have 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 shall take place 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.

Reason: To ensure a satisfactory form of development and in the interests of adjacent designated sites.

#### Phasing Plan

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.

#### Construction Environmental Management Plan:

12. No development shall take place, including any site clearance works, until a Construction Environmental Management Plan has been submitted to and approved in writing by the Local Planning Authority. The details shall be in accordance with the approved Environmental Statement and its addendums. Thereafter the approved Construction Environmental Management Plan shall be implemented and adhered to throughout the construction period unless otherwise agreed in writing with the Local Planning Authority. The Construction Environmental Management Plan shall provide details as appropriate but should include:

- 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);
- details of mitigation measures to manage and avoid impacts to controlled waters, adjacent designated sites, protected species and other (important habitats (in accordance with the approved Environmental Statement and its addendums);
- damping down of dust sources and covering of loose materials to reduce dust disposition;
- 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;
- 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.

#### Highways

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 necessarily be limited to:
- Anti-dazzle measures;
  - Measures to avoid 'see-through' at the reordered junction of Coombes Road and The Drive;
  - Bollards/street furniture;
  - Road markings;
  - Signage;
  - Retaining walls design, materials and construction details;
  - Materials;
  - Gateway feature.

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

14. The development hereby permitted 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 following consultation with 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.

#### Landscaping/Trees

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.

These details shall include:

- 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;
- details of tree pits;
- finished levels and contours;
- fencing;
- 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 landscaping shall also be carried out in accordance with the approved details prior to the use 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 comprised in the approved details of landscaping shall be carried out in the first planting and seeding season following the first use 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 otherwise agreed in writing by the Local Planning Authority.

The content of the LEMP shall include the following:

- description and evaluation of features to be managed;
- ecological trends and constraints on site that might influence management;
- aims and objectives of management;

- appropriate management options for achieving aims and objectives;
- prescriptions for management actions, together with a plan of management compartments;
- preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period;
- details of the body or organisation responsible for implementation of the plan;
- 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 biodiversity objectives of the originally approved scheme.

Reason: To ensure a satisfactory development and in the interests of amenity, ecology and landscape character.

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 the numbering and detailing of trees, confirmation of 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 the approved details and the measures set out in the Environmental Statement, chapter 10 Ecology and Nature Conservation and 11 Landscape and Visual.

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.

#### Lighting

20. 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 (following consultation 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. All external lighting shall be installed, maintained and permanently operated in accordance with the approved details unless otherwise agreed in writing with the Local Planning Authority.

Reason: To enable the Local Planning Authority to control the development in detail in the interests of road safety, night time amenity, tranquillity and to protect and conserve Dark Night Skies.

#### Ecology

21. 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 shall be 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.

## **Informatives/Notes**

### **These are advice notes to the applicant and are not part of the planning conditions:**

- 1 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 the Environment Agency.  
  
The Environment Agency 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 the Environment Agency's National Customer Contact Centre on 03708 506 506
- 2 Highways: - 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.
3. 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.
4. 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.
- 5 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.
6. Ensure that any Phase 2 Contamination 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.
8. Guidance on Lighting - Guidance on appropriate lighting in the South Downs National Park can be found in the SDNPA's Dark Skies Technical Advice Note (2021), which is available online.

## **11. Crime and Disorder Implications**

- 11.1 It is considered that the proposal does not raise any crime and disorder implications as the overall design principles used for this scheme have followed best practice in 'designing out crime'.



## **12. Human Rights Implications**

- 12.1 This planning application has been considered in light of statute and case law and any interference with an individual's human rights is considered to be proportionate to the aims sought to be realised.

## **13. Equality Act 2010**

- 13.1 Due regard has been taken of the South Downs National Park Authority's equality duty as contained within the Equality Act 2010.

## **14. Proactive Working**

- 14.1 In reaching this decision the South Downs National Park Authority has worked with the applicant in a positive and proactive way, in line with the NPPF. This has included pre-application discussions to ensure that the development brought forward conserves and enhances the natural beauty, wildlife and cultural heritage of the National Park.

### **Plans and Documents referred to in consideration of this application**

The application has been assessed and the recommendation is made on the basis of the following plans and documents submitted:

Plans and Documents				
Drawing Reference	Version No.	Date on Plan	Date Received	Plan/document Title
HED-1172-LA-700	P03	06/11/2020	07/05/2021	Location Plan
HED-1172-LA-701	P05	20/07/2020	07/05/2021	Illustrative Master Plan
HED-1172-LA-702	P06	21/07/2020	07/05/2021	General Arrangement Plan
HED-1172-LA-703	P03	21/07/2020	07/05/2021	Site Sections
HED-1172-LA-704	P05	21/07/2020	07/05/2021	Tree Removal Plan
HED-1172-LA-705		22/07/2020	22/07/2021	Additional Habitat Enhancement and Creation
VN201557/PL-03	J	07/06/2020	02/06/2021	Road Improvements, Development Access & Sussex Pad
VN201557_TR-06		01/07/2021		Swept Path Analysis
	P06	21/04/2021	07/05/2021	Landscape Design & Access Statement
	P01	21/04/2021	07/05/2021	HED Ecosystems Services Statement
		01/09/2020	16/11/2020	Badger Monitoring Report 2020
CBA10664FA VI		01/07/2020	16/11/2020	Tree Survey Report
I0007/R10		04/11/2020	16/11/2020	Heritage Statement
		01/08/2020	16/11/2020	Planning Statement
		01/03/2020	16/11/2020	Preliminary Ecological Appraisal
		01/09/2020	16/11/2020	Reptile Survey 2020
HED-1172-LA-912	P01	21/04/2021	07/05/2021	Ecosystems Services
Letter		22/07/2021	22/07/2021	Updated Reptile Mitigation Strategy (The Ecology Partnership)

VN201557		01/08/2020	16/11/2020	Transport Assessment
			07/05/2021	Vectos Highway Note 02
103574		18/06/2021	22/06/2021	Vanguardia Traffic Vibration Effects Report
	VI.2	17/05/2021	17/05/2021	CEP Flood Risk Assessment
23413		06/01/2021	17/02/2021	CEP Technical Note
		01/11/2020	16/11/2020 & 24/11/2020	Environmental Statement & Appendices, DHM Stallard

**Reasons:** For the avoidance of doubt and in the interests of proper planning.

**Tim Slaney**

**Director of Planning**

**South Downs National Park Authority**

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Appendices  
1. Site Location Map  
2. Ecosystems Services Plan

SDNPA Legal Services, Development Manager.

Consultees

Background Documents All planning application plans, supporting documents, consultation and third party responses

<https://planningpublicaccess.southdowns.gov.uk/online-applications/>  
South Downs National Park Local Plan  
<https://www.southdowns.gov.uk/planning/national-park-local-plan/>

Revised National Planning Policy Framework (2021)  
<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

South Downs National Park Partnership Management Plan 2020-2025  
<https://www.southdowns.gov.uk/partnership-management-plan/>

South Downs Integrated Landscape Character Assessment  
<https://www.southdowns.gov.uk/landscape-design-conservation/south-downs-landscape-character-assessment/>

Roads in the South Downs  
<https://www.southdowns.gov.uk/wp-content/uploads/2015/09/Roads-in-the-South-Downs.pdf>

**Agenda Item 8 Report PC 21/22-02- Appendix I Site Location Map**



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## Agenda Item 8 Report PC 21/22-02- Appendix 2 Eco Systems Services Plan

