

REFERENCE

Comment number: WIO-M-1

Date received: 27/05/2016

5/27/2016

Adur and Worthing Councils Mail - Worthing Local Plan - Aquarena AOC1



Ian Moody <ian.moody@adur-worthing.gov.uk>

Worthing Local Plan - Aquarena AOC1

1 message

Roffey Homes <Info@roffeyhomes.com>

27 May 2016 at 13:10

To: "ian.moody@adur-worthing.gov.uk" <ian.moody@adur-worthing.gov.uk>

Cc: Chris Barker <cbarker@eceptanning.com>

Dear Ian

I am writing to you solely in relation to the above site and the Worthing Local Plan, and with specific reference to your letter addressed to me but sent to Chris Barker. Please for future purposes note my address and contact details below.

I currently have a contractual position with the landowner in relation to purchasing the land subject to planning permission being achieved.

As you are aware our last planning application for 147 units was refused for the site but has been appealed by ourselves. In the meantime we are seeking to submit an alternative scheme to the LPA in the coming months. As yet we are unable to specifically confirm the quantum of residential development but would suggest it very likely be in excess of 100 units.

As you mention in your letter, part of the Area of Change site has already been completed in the form of the Leisure Centre, which contains both a swimming pool, gym and other leisure uses together with a café. This has delivered the required leisure use stated within the Area of Change policy.

Alongside the residential element proposed on our part of the Areas of Change site, it is anticipated although not guaranteed, that the following uses may also be delivered by our site:

- Commercial space of between 300-600m2. Planning Use Class proposed to be wide ranging to encourage occupation.
- Public car park
- Public seafront café and public space

In terms of delivering the site, it is our intention to submit an application that, in the current economic situation, is deliverable by ourselves in the very near future. It is hoped an approval would be achieved this year which would then result in a likely 3 year build programme.

I hope this helps?

With regard to the wider consultation on the Worthing Local Plan, it is my intention to respond to this at a later date, but still within the consultation period.

5/27/2016

Adur and Worthing Councils Mail - Worthing Local Plan - Aquarena AOC1

Kind regards

Ben

Ben Cheal • Managing Director



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Your Town - Your Future

**A new Local Plan for Worthing
Consultation Document May 2016
Comments Form**

Worthing Borough Council has started work on preparing a new Local Plan which will have a big influence on the town in the period up to 2033. The publication of the 'Your Town - Your Future' consultation document provides the first opportunity to comment on relevant issues and options.

This consultation runs from **11th May to 22nd June 2016**

Website: www.adur-worthing.gov.uk/worthing-local-plan

Email: please email this completed form to worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council,
Portland House, 44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	Ben		
Last name	Cheal		
Organisation (where applicable)	Roffey Homes		
Address line 1	17a Buckingham Road		
Address line 2	Worthing		
Address line 3			
Postcode	BN11 1TH	Telephone	01903 202133
Email address	info@roffeyhomes.com		

You can respond to this consultation online or by email. However, if your preference is to make comments manually this form can be photocopied as many times as necessary.

To keep you informed on progress all respondents will be added to the Worthing Planning Policy consultee database unless you request otherwise.

Use of information: Names and comments we receive will be available for public inspection and may be reported publicly as part of the Local Plan process. Contact details will not be published. Further information about how personal information is processed can be found on the Council's website. Unfortunately we cannot accept or report confidential or anonymous responses. All data will be stored securely in line with the Data Protection Act 1998.

Section B - Comments

The consultation document summarises issues and options within thematic sections. General comments can be inserted in the box below and comments about specific sections of the Plan can be made in response to some key questions that follow.

VISION

Q1a - Do you agree with the Vision we are aiming and aspiring to achieve?

Yes, however I struggle with the use of the term "intrinsic character". Worthing has changed from a fishing village to a regional town over the centuries. As it has changed, so its character has inevitably changed. It seems to be that protecting and enhancing the Borough's "intrinsic character" will likely restrictively shackle the Vision. I would suggest this term be changed to "historic assets" or similar. I say this as historically many previous periods in time demolished and rebuilt large amounts of their predecessors work.

Secondly, and linked to above, the town is constrained by the sea and the Downs, and so surely the focus must now be on BOTH utilising limited land resources in the most efficient way (as mentioned in the vision statement) AND utilising the existing built environment in the most efficient way? I strongly believe this should be referenced to give a clear mandate on the matter.

Q1b - Does it provide a clear direction for the Worthing Local Plan?

Yes subject to above

Q1c - Is there anything you think we have missed which you would like to see incorporated in the Vision?

As above

STRATEGIC OBJECTIVES

Q2a - Do you agree with the proposed objectives set out above? If not, what changes would you like to see?

Yes subject to the following objections:

Community bullet point 5 – the term 'safeguarding family homes' suggests that a policy be implemented down the line to not allow the loss of family homes. Due to a very low level of undeveloped land supply, the aim should be to encourage quality redevelopment of existing land, including where applicable existing residential homes, in a more efficient way. Environment bullet point 3 confirms this. So inclusion of the term as written seems to me to certainly cause subjective opinion on its meaning, which could be used as a means discourage more efficient development on brownfield land.

Environment bullet point 5 – same objection as mentioned in Question 1a.
Q2b - Are the objectives sufficiently distinctive and locally specific?
I think specific mention of redeveloping previously developed land should be included in Community section.

ECONOMY
Q3a - Do you agree with the key challenges identified for the economy? Are any missing?
No comments
Q3b - Should the Local Plan continue to protect key employment areas or should it be more flexible in its approach?
There should be flexibility, although protection to the best assets is also imperative. Sometimes loss of employment policies are used to rigidly, and so appropriate flexibility is needed.
Q3c - In addition to the sites already identified as having the potential to deliver employment land are there any other sites that could accommodate employment growth?
No comments

RETAIL AND THE TOWN CENTRE
Q4a - Have all the key challenges for retail areas and the Worthing town centre been identified, if not what has been missed?
No mention of accessibility such as parking, central bus hub, link from station etc
Q4b - Are retail centres functioning well - how can they be improved?
Personally I think the higher quality provision in the retail centre in the town is shrinking. Lower quality retail provision, or bars etc, usually takes its place, creating a negative first impression on the arteries into the town centre, in particular from the north and west. This needs to be addressed by allowing redevelopment of poor quality units and enhancing the experience outside of the units.
Q4c - How could new development in the town centre enhance the town's identity and attract more visitors?
Many units are extremely out of date and active encouragement to redevelop these units should be the route taken. Newer units will bring in better tenants and architecturally invigorate the retail centre. Leaving the units as they are creates a strong negative downward spiral for them. One look above these units to see how they are not being maintained above the shopfront shows this very clearly.

TOURISM
Q5a - Have the key challenges for tourism been addressed?
No mention of transport and parking to assist tourism industry
Q5b - In what ways can the tourism offer be improved?
By the council setting a lead in investing in the bland seafront to the west of the pier,

COMMUNITY AND LEISURE FACILITIES
Q6a - Do you agree with the main challenges identified in planning for the provision of different infrastructure needs? Are any missing?
No comments
Q6b - Do you have suggestions for how the Local Plan could resolve these?

No comments
Q6c - Are you aware of any particular community and leisure needs?
No comments

TRANSPORT
Q7a - Do you agree with the main challenges identified? Are any missing?
No comments
Q7b - Do you have any suggestions for how the Local Plan could better promote sustainable transport?
Improved cycle path routes along the coast and along the main north artery, including the station. The current cycle route from the station is abysmal

ENVIRONMENT
Q8a - Do you agree with the main environmental challenges identified? Are any missing?
No comments
Q8b - Do you have any suggestions for how the Local Plan could reach a balance between competing needs?
No comments
Q8c - Are there any circumstances you consider where regardless of mitigation, development would be inappropriate?
No comments
Q8d - What value do you place on the borough's green spaces, particularly those around the town?
No comments

HOUSING
Q9a - Should housing delivery be given higher priority than other development needs (e.g. employment land, community facilities)?
If it is affecting the other needs then yes. But if those needs are also aspirational and ultimately undeliverable, then yes housing delivery should also be given priority
Q9b - How should we best address specialist housing needs (e.g. affordable housing; family housing; self-build housing; sheltered & extra care; houses in multiple occupation)?
By encouraging greater housing supply to release pressures on all housing needs
Q9c - Efficient use of land will help to raise densities and will contribute towards meeting development needs. What potential impacts of this should the Council try to mitigate?
No comments
Q9d - Should the Council include a policy that would resist the inappropriate development of residential gardens?
Backland garden development can provide a significant supply of new housing when carried out in a reasonable manner, particularly when your undeveloped land supply is extremely low and constrained. Blanket opposition to such backland development is therefore inappropriate as a policy in Worthing.

DEVELOPMENT OPTIONS WITHIN THE TOWN
Q10a - Do you agree that the sites listed above provide the most significant redevelopment and regeneration opportunities to deliver housing, employment and leisure uses within the town?
They are part of the solution, but many of them seem undeliverable in the short to mid term, even after being included over the last number of years as Areas of Change.

There are many other ways of delivering housing on brownfield land within the town as well.

Q10b - Do you have any particular comments on how any of the identified sites should be developed and for what mix of uses?

No comments

Q10c - Are there any other potential development sites within the current built up area that should be assessed?

All of the seafront area with potential for height

Main arterial corridors

Areas of existing low density housing.

A main thrust of the WLP should be to review and encourage previously developed that has no great historical benefit.

A Tall building strategy should be more encouraging in certain area where height exists or has potential, such as main arterial corridors

EDGE OF TOWN DEVELOPMENT OPPORTUNITIES

Q11a - Given the housing needs in the Borough do you have any views as to which of these sites should be developed or protected?

Goring – Ferring gap – should be protected as one of the last gaps in urban sprawl from Littlehampton through to past Brighton

Q11b - If any of these sites (in full or in part) are to be allocated for development do you have any views on how they should be developed?

Chatsmore Farm must be included in the CIL area to provide CIL as currently it is not and this is a criminal error by LPA.

Q11c - If any of these sites are not allocated for development do you have any views on how they should be protected, enhanced or used?

No comments

Q11d - Land West of Fulbeck Avenue (site 7) and Land north of West Durrington (site 8) are already within the Built Up Area boundary. In light of significant housing needs should the Council take a positive approach and look to bring forward these sites in advance of the adoption of the new Local Plan?

yes

PLANNING POLICIES

Q12a - Do you have any views on how any of the listed policies should be worded?

Only that they should give presumption in favour of encouraging good brownfield redevelopment of previously developed land

Q12b - Are there any policies missing from the list?

A Tall buildings review and strategy that gives guidance on where in the next 20 years tall buildings would be acceptable to aid the town in providing housing and other objectives.

Q12c - Are all of the listed policies required?

No comments

Please continue on separate sheets as necessary

Name:	Ben Cheal	Signature	Ben Cheal
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Date:	10th June 2016		

REFERENCE

Comment number: WIO-M-2

Date received: 25/05/2016

Patricia Butcher [REDACTED]


25 May (2 days ago)

to me

Dear Sir

Please find attached the British Horse Society's response to the Worthing Local Plan Issues and Options consultation. I would be grateful for acknowledgement of safe receipt of this email and attachment.

Yours faithfully
Tricia Butcher
The British Horse Society
County Access & Bridleways Officer (West Sussex)



Sent by email to:

worthinglocalplan@adur-worthing.gov.uk

25th

May 2016

Dear Sir

The British Horse Society (BHS) is the UK's largest equine charity and equestrian membership organisation and the governing body for recreational riding. It's charitable objects include the promotion of equestrian safety, particularly on roads, and equestrian access to bridleways and other off-road multi-use routes for the public benefit. I would like to make the following comments on The Society's behalf:

Worthing Local Plan Issues and Options consultation

There are a significant number of equestrians located south of the A27 on the urban fringes of Worthing, both to the east and the west. In common with other non-motorised user (NMU), i.e. walkers and cyclists, they have a need to safely cross the A27 in order to access the countryside and the network of public rights of way (prow) in the South Downs National Park.

To the east, roads north of the A27 such as Lambley's Lane and Dankton Lane lead directly to bridleways which can be used by all. To the west, at Castle Goring there is a bridleway directly opposite on the north of the A27, Highways England undertook a feasibility study in 2010 for a bridge crossing at this location, and this should be progressed especially in view of the development coming forward at West Durrington, which provides an opportunity to create multi-user linking prow to the south.

The A27 acts as a barrier to all NMUs, even riders who keep their animals to the north are unable to safely walk or cycle with the family to reach them, having no option but to commute by car. The Local Plan should acknowledge this, and should be pressing for dedicated NMU grade separated crossings as part of the Highways England proposed Worthing to Lancing A27 improvement scheme.

The National Planning Policy Framework (NPPF) para 75, states that "*Planning policies should protect and enhance public rights of way and access. Local authorities should seek opportunities to provide better facilities for users, for example by adding links to existing rights of way networks.*" Incorporating this aim into the Local Plan would bring benefits for the Environment, Transport, Tourism, and Community and Leisure Facilities.

Mention should also be made of the West Sussex Rights of Way Improvement Plan (RoWIP), incorporated into the West Sussex Transport Plan 2011-2026, which sets out plans to improve both the prow network, and safe access to the countryside for all vulnerable road users.

The Society would welcome the opportunity to work with the Council and others to achieve these aims and objectives.

Yours faithfully
Tricia Butcher
County Access & Bridleways Officer

REFERENCE

Comment number: WIO-M-3

Date received: 13/05/2016

rosalind collins [REDACTED]

13 May

to me

Having moved from south London in 1988 to Worthing after I married a Worthing serving police officer, I was pleased that my children would be able to see fields, hills and sheep on their way to school and walk there. Over the years Worthing is turning more like south London and I fear soon a lot of the green fields will be gone. I have seen a kingfisher flying around Northbrook round about which must have come from Ferring Rife. When the new Tesco Extra was being planned and the development of houses on the fields I wrote to the council against the development. I have read the Worthing Local Plan online and my thoughts are as follows. I do not want Chatsmore farm used for development. There has been enough development along Littlehampton Road. The plan stated that Worthing needs more office and industrial units but the offices next to southern water are mostly empty and always have signs up for Let.

I do not want to see any more houses built on the west Durrington site or castle Goring which is a lovely natural area with fields and wildlife.

I have had relatives that have stayed at Titnore Lane camp site, you can walk to Highdown from there, another Natural Pursuit will be lost.

Goring Gap, this should not be built on, it would ruin that end of Ferring which still has its country village feel with the fields.

I do not want any building on fields.

I think any new housing that is needed should be built on sites that are already built up or in a built up area. Teville Gate should be used for flats and housing if possible. Worthing does not need a new Cinema, we have the Dome. Worthing does not need more shops, people do not have the money to spend in the shops, a lot turn into Charity shops which makes Worthing look impoverished. Worthing has enough eating out places, people do not have the money to support any more.

Union Place should also be made into housing. Worthing does not need more shops, The Guildbourne Centre is mostly empty!

Stage coach, this should also be made available for housing

Worthing FC this should remain where it is as if moved it will mean making another field into a football pitch to replace the one at the moment.

I would rather let people who have a large back garden sell off some of it for housing as mostly the house will be in a built up area anyway, better this than ruining another open space.

Centenary House Durrington where would all the offices that use that site go? would another building need to be built to house the agencies that use it, would that be built on another field?

If the house building continues in Worthing, it is not a place I would want to live in anymore and I would consider moving away in the next 10 years.

I hope you read all of my concerns and suggestions

Regards

REFERENCE

Comment number: WIO-M-4

Date received: 12/05/2016

**Office Use only**

Comment number:

Date received:

Your Town - Your Future

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Email: please email this completed form to worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council,
Portland House, 44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	Cllr Luke		
Last name	Proudfoot		
Organisation (where applicable)			
Address line 1	114 Tarring Road		
Address line 2	Worthing		
Address line 3	West Sussex		
Postcode	BN11 4HA	Telephone	
Email address	lproudfoot@hotmail.co.uk		

You can respond to this consultation online or by email. However, if your preference is to make comments manually this form can be photocopied as many times as necessary.

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Section B - Comments

The consultation document summarises issues and options within thematic sections. General comments can be inserted in the box below and comments about specific sections of the Plan can be made in response to some key questions that follow.

Please see attached sheets (2) for further comments

VISION

Q1a - Do you agree with the Vision we are aiming and aspiring to achieve?

Yes, Worthing is a prosperous town that is moving in the right direction on all fronts.

Q1b - Does it provide a clear direction for the Worthing Local Plan?

Yes.

Q1c - Is there anything you think we have missed which you would like to see incorporated in the Vision?

Specific protection for local green spaces.

STRATEGIC OBJECTIVES

Q2a - Do you agree with the proposed objectives set out above? If not, what changes would you like to see?

Yes

Q2b - Are the objectives sufficiently distinctive and locally specific?

Yes

ECONOMY

Q3a - Do you agree with the key challenges identified for the economy? Are any missing?

Yes

Q3b - Should the Local Plan continue to protect key employment areas or should it be more flexible in its approach?

It should be more flexible. Employment is changing from 9-5 office based to being far more flexible with many people working from home or in the field using technology to stay connected. Therefore some large employment sites are not being used as well as they could be due to staff not being needed there. Sites like these could be partly/wholly turned into residential sites.

Q3c - In addition to the sites already identified as having the potential to deliver employment land are there any other sites that could accommodate employment growth?
No

RETAIL AND THE TOWN CENTRE

Q4a - Have all the key challenges for retail areas and the Worthing town centre been identified, if not what has been missed?

Yes

Q4b - Are retail centres functioning well - how can they be improved?

Yes

Q4c - How could new development in the town centre enhance the town's identity and attract more visitors?

Key brownfield sites in the town centre need to be developed with mixed retail/housing. These should be high density housing above retail units that can attract nationally recognised retailers and restaurants to our town.

TOURISM

Q5a - Have the key challenges for tourism been addressed?

Yes I believe so.

Q5b - In what ways can the tourism offer be improved?

Keep the wonderful range and number of events up, and keep them well advertised across the UK.

COMMUNITY AND LEISURE FACILITIES

Q6a - Do you agree with the main challenges identified in planning for the provision of different infrastructure needs? Are any missing?

Yes Mostly.

Q6b - Do you have suggestions for how the Local Plan could resolve these?

The Local Plan and indeed the town's planning policies should make sure that affordable housing needs are met and that doctors surgeries are expanded or new ones built when new housing developments are built.

Q6c - Are you aware of any particular community and leisure needs?

The community in Castle Ward is in need of a new or expanded doctors surgery due to many new developments putting pressure on the surgery due to it being oversubscribed.

TRANSPORT

Q7a - Do you agree with the main challenges identified? Are any missing?

The A259 and A27 are incredibly busy at peak times. New development will need to take into account the increased traffic that it will bring. Even if development is near trains stations or bus stops, people will still own cars and want to drive.

Q7b - Do you have any suggestions for how the Local Plan could better promote sustainable transport?

Not at this time.

ENVIRONMENT

Q8a - Do you agree with the main environmental challenges identified? Are any missing?

Yes
Q8b - Do you have any suggestions for how the Local Plan could reach a balance between competing needs?
Not at this time.
Q8c - Are there any circumstances you consider where regardless of mitigation, development would be inappropriate?
On greenfield sites on the edge of town such as Chatsmore Farm (land between the railway line at Goring and the A259), and the southern Goring-Ferring Gap.
Q8d - What value do you place on the borough's green spaces, particularly those around the town?
I place a very high value on these sites. They should be protected from future development. It is completely inappropriate to develop these greenfield edge of town sites like Chatsmore Farm and the Southern Goring-Ferring Gap. (Please see attached letter for further comments on this issue)

HOUSING

Q9a - Should housing delivery be given higher priority than other development needs (e.g. employment land, community facilities)?
Housing should be given a higher priority than employment land for the reasons laid out above on the changing nature of employment and working practices. However community buildings and facilities should go hand in hand with additional housing so as not to put too much pressure on current community facilities.
Q9b - How should we best address specialist housing needs (e.g. affordable housing; family housing; self-build housing; sheltered & extra care; houses in multiple occupation)?
Affordable housing should be provided at the correct number by developers. They should not be allowed to not provide any affordable housing with the excuse that it isn't viable for them. Their expensive properties are not viable for our community. They should stick to the rules and provide adequate affordable housing. The Planning Committee should enforce this and not allow developments to pass that fail to provide affordable housing, which it has done in the past.
Q9c - Efficient use of land will help to raise densities and will contribute towards meeting development needs. What potential impacts of this should the Council try to mitigate?
Density on brownfield town centre sites should be high, but within the legal limits so as not to be detrimental to those who will live there. This should be enforced by the planning committee.
Q9d - Should the Council include a policy that would resist the inappropriate development of residential gardens?
No. Some residential gardens are extremely large and can provide additional housing. Each application should be looked at carefully though so as not to impact too much on other neighbours and the community.

DEVELOPMENT OPTIONS WITHIN THE TOWN


Q10a - Do you agree that the sites listed above provide the most significant redevelopment and regeneration opportunities to deliver housing, employment and leisure uses within the town?
Yes I do. Town Centre development should be the key aspect of Worthing's future development. These sites need regeneration and will transform the town for the better once they are developed.
Q10b - Do you have any particular comments on how any of the identified sites should be developed and for what mix of uses?
They should be high-rise, high density and provide a mix of retail, leisure and housing. The housing element should be most important with only the first floor or two being retail or leisure followed by perhaps 10-25 floors of housing depending on the site.
Q10c - Are there any other potential development sites within the current built up area that should be assessed?
Teville Gate, the Aquarena site, Union Place, Grafton Road Car Park. These sites are ugly monstrosities and the sooner they can be developed the sooner the town will benefit from improved retail, leisure and housing.

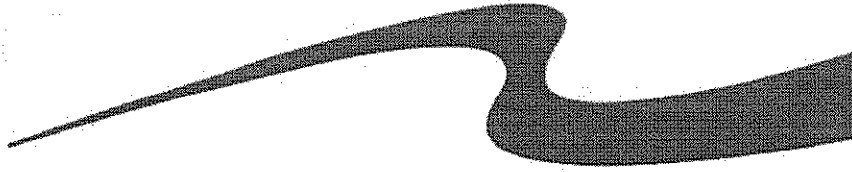
EDGE OF TOWN DEVELOPMENT OPPORTUNITIES

Q11a - Given the housing needs in the Borough do you have any views as to which of these sites should be developed or protected?
I believe that greenfield edge of town sites should be protected from development. Chatsmore Farm (land between the railway line at Goring and the A259) should be protected for the reasons set out in my letter. The local plan document also sets out a number of clear reasons why this should be protected. The Southern Goring-Ferring Gap should also be protected from any future development.
Q11b - If any of these sites (in full or in part) are to be allocated for development do you have any views on how they should be developed?
They should not be developed.
Q11c - If any of these sites are not allocated for development do you have any views on how they should be protected, enhanced or used?
They should be able to be used by the community and for nature. Chatsmore Farm is on the border of the national park, Perhaps it could be given special status of some sort or incorporated into the national park.
Q11d - Land West of Fulbeck Avenue (site 7) and Land north of West Durrington (site 8) are already within the Built Up Area boundary. In light of significant housing needs should the Council take a positive approach and look to bring forward these sites in advance of the adoption of the new Local Plan?
Yes I believe so.

PLANNING POLICIES
Q12a - Do you have any views on how any of the listed policies should be worded?
The Affordable housing should not be an option, which some developers seem to think it is. If a development cannot meet the number of affordable housing required it should not be built.
Q12b - Are there any policies missing from the list?
I do not think so.
Q12c - Are all of the listed policies required?
I believe so.

Please continue on separate sheets as necessary

Name:	Luke Proudfoot	Signature	
Date:		12/5/16	



Councillor Luke Proudfoot

Councillor for Castle Ward

Planning Policy Team
Worthing Borough Council
Portland House
44 Richmond Road
Worthing
BN11 1HS

12th May 2016

Dear Sir/Madam

RE: WORTHING BOROUGH COUNCIL LOCAL PLAN CONSULTATION

I am writing to put across the reasons why I believe that WBO8152 Land South of Highdown Littlehampton Road (Chatsmore Farm) is unsuitable to be designated for potential housing development in Worthing's Local Plan and should be protected from future development.

This land is a strategic gap that separates the two urban settlements of Worthing and Ferring. If this land were to be developed it would create a large urban sprawl that permanently joins the two distinctive settlements.

Chatsmore Farm is on the border of the South Down National Park, separated only by the A259. This means that the land is very important as any development on the land would have a major negative impact on the South Downs National Park. Development on this site would ruin views from Worthing up into the South Downs National Park and from vantage points in the National Park such as Highdown Hill down into Worthing. Chatsmore Farm provides uncommon relief from views of settlement along the coastal path, and coupled with school playing fields to the south it adds to the perception of a definitive gap between the two settlements. The site is one of major visual sensitivity that should be protected for future generations.

The centre of this site has Ferring Rife running through it. This rife is prone to flooding during heavy rain, which will put any future housing developments at great risk of flooding. This will mean future home owners will have to pay high insurance premiums, if they can get insurance, and will have their lives turned upside down whenever a flood occurs. Flood defences could be built, but as has been seen across the country in recent years, no matter what flood defences are constructed they could always be enough rain to break them.

Councillor Luke Proudfoot
114 Tarring Road, Worthing, West Sussex BN11 4HA
Telephone: 07875 886572
email: luke.proudfoot@worthing.gov.uk

Councillor for Castle Ward

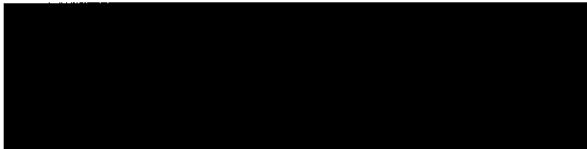
In this area of Worthing there have been, or are currently being, built over a thousand new housing units. These are at West Durrington, Cissbury Chase, Lloyds Bank Tower, and the Lloyds Banking Hall. This influx of extra residents, particularly around The Strand/The Boulevard roundabout area, has seen a great pressure put on the local infrastructure in Castle Ward and the surrounding area. The Strand Medical Group is massively oversubscribed with many patients regularly contacting me about lengthy waiting times to see a doctor or nurse due to the sheer number of patients registered at the practice. Chatsmore Farm could hold well over 400 housing units, which would most likely bring around 1000 new residents to Castle Ward. This would add an untold amount of additional pressure on to the Strand Medical Group. Even if we (local councillors) were successful in our campaign to move or to expand the surgery, this level of additional residents would make things even worse than they are now. If the surgery remains as it is it could cause such additional pressure that I fear the surgery could not cope and residents' health would be put at risk. Anecdotally my mother has phoned the Strand Medical Group for an appointment for my elderly and ill grandmother the second the phone lines open, only to be 53rd in the queue for an appointment. This highlights the level of pressure that the surgery is under without hundreds of additional housing units.

A new development of this size would also put a great strain on our schools and on our road network that is already extremely busy during peak times. Despite being near to a train station and other public transport, new residents will still wish to drive. This has been shown by the problem parking now happening in The Causeway and other areas due to additional cars in the area.

I believe that new development in Worthing should be on brownfield sites, particularly town centre sites, such as Teville Gate, the former Aquarena, Union Place and Grafton Road Car Park, not on greenfield sites on the edge of town.

I very much hope that the views and concerns of myself and local Castle Ward residents will be given the serious consideration that they deserve, that they will be acted upon accordingly and that Chatsmore Farm will be protected from development.

Kind regards



Cllr Luke Proudfoot MA BA (Hons)
Worthing Borough Councillor
Castle Ward

REFERENCE

Comment number: WIO-M-5

Date received: 11/05/2016

Ed Miller [REDACTED]

11
May

to me, David

Ferring Conservation Group, representing over 950 members, welcomes the opportunity to comment on the 'Your Town – Your Future' document published this week. Only a minority of our members live in Worthing but for the rest of us, Worthing *is* 'our town' – we shop there, are entertained there, attend hospital there and make use of its many other facilities.

We applaud the general approach in this document – examining the scope for meeting housing and employment needs within environmental constraints and aspirations, and suggesting that the scope is limited. But we do not think it appropriate to comment in detail on any other issue than the future of the two large areas of undeveloped land that border Ferring – Chatsmore Farm and the Ferring-Goring Gap.

In answer to the questions on page 32:

- a) We strongly feel that Chatsmore Farm and the Ferring-Goring Gap should be protected from development. They are continuous with land of similar landscape, recreational, and wild life habitat value in Ferring (a small area west of Chatsmore Farm and a much larger area of the Gap east of Sea Lane, Ferring.
- b) Not applicable..
- c) Both areas should be designated as Local Green Space, as proposed (for both the Arun and Worthing sections) by Conservation Groups and Residents Groups, and Ferring Parish Council in submissions to both Councils in 2015. This designation is perfectly compatible with the agricultural use to which they have always been devoted.
- d) This is strictly a matter for Worthing residents.

Ed Miller (Vice-Chairman, Ferring Conservation Group)
Sent from Mail for Windows 10

REFERENCE

Comment number: WIO-M-6

Date received: 03/06/2016

Policy, Planning <Planning.Policy@southernwater.co.uk>

3 Jun (4
days ago)

to me

Tracy,

Thank you for consulting Southern Water on the Issues and Options stage of the development of Worthing's Local Plan.

At this point, we do not have any specific comments to make regarding the content of the document, but in Local Plan development, would refer you to our Guiding Principles document (attached) which should be used to inform relevant policy making.

With reference to the letter for statutory consultees, I confirm all borough, county, district and neighbourhood consultations should be sent to our planning.policy@southernwater.co.uk email address.

If you have any queries please don't hesitate to contact me.

Kind regards,

Charlotte Mayall
Planning Coordinator

T. 01273 663742
www.southernwater.co.uk

Southern Water's Guiding Principles

1. Introduction

Southern Water has developed a set of guiding principles which the company applies when responding to planning policy consultations. These guiding principles reflect the following aims:

1. Meeting the increased demand for services arising from new development.
2. Protecting groundwater and surface water sources from pollution.
3. Providing high levels of service to new and existing customers, and meeting strict environmental standards in the treatment of wastewater.
4. Promoting efficient and sustainable use of water resources and wastewater assets.
5. Protecting sensitive development from odour pollution.

2. The Guiding Principles

To achieve these aims, Southern Water looks to Development Plan Documents to meet the guiding principles below, in line with the National Planning Policy Framework.

Aim: Meet the increased demand for services arising from new development.

Guiding principles: Ensure that policies are in place to:

- ✓ support provision of new utility infrastructure, including water and wastewater infrastructure. This will help to ensure timely provision of additional capacity to meet the demand arising from new and existing development.
- ✓ support, for each allocated site on a site by site basis, the timely provision of sewerage infrastructure to service the site. This is consistent with the water industry's economic regulator, Ofwat, who expects Southern Water to work proactively with planning authorities to limit the risk from sewer flooding and to make suggestions if a different point of connection to the sewerage system would help to limit the risk.

Aim: Protect groundwater and surface water sources from pollution.

Guiding principle: Ensure that policies are in place to:

- ✓ prevent development that would lead to unacceptable deterioration in the quality and potential yield of groundwater and surface water sources.
- ✓ support provision of new infrastructure to enable treatment of wastewater to high environmental standards, as set by the Environment Agency.

Aim: Provide high levels of service to new and existing customers, and continue to meet strict environmental standards in the treatment of wastewater.

Guiding principles: Ensure that policies:

- ✓ require phasing of developments when existing infrastructure and treatment capacity is insufficient to meet the increased demand. This is particularly important when necessary investment has long lead-in times, and implementation is subject to delays beyond Southern Water's control.
- ✓ make land available for the expansion of wastewater treatment works when demand arises. New treatment works may be needed on rare occasions.
- ✓ allow the continued operation of existing water and wastewater facilities.

Guiding principle: Ensure that the planning system supports at the appropriate stage:

- ✓ protection of underground water and wastewater infrastructure in close proximity of, or crossing, proposed development sites.

Aim: Promote efficient and sustainable use of water resources and wastewater assets.

Guiding principles: Ensure that policies:

- ✓ encourage water efficiency in new developments.

Aim: Protect sensitive development from odour pollution.

Guiding principle: Secure policies which:

- ✓ ensure that sensitive developments are sufficiently separated from wastewater treatment works to allow adequate odour dispersion.

REFERENCE

Comment number: WIO-M-7

Date received: 07/06/2016



08:34 (4 hours ago)

For you...

----- Forwarded message -----

From: **Projectmail - National Grid** <n.grid@amecfw.com>

Date: 6 June 2016 at 12:55

Subject: Response on behalf of National Grid

To: "planning.policy@adur-worthing.gov.uk" <planning.policy@adur-worthing.gov.uk>

Dear Sir/Madam,

Please find the attached response on behalf of National Grid.

Kind regards,

Amec Foster Wheeler on behalf of National Grid

Planning & Design| E&I UK

Amec Foster Wheeler

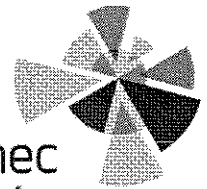
Gables House, Kenilworth Road, Leamington Spa, CV32 6JX

Tel +44 (0)1926 439000

n.grid@amec.com

nationalgrid

Planning Policy
Adur & Worthing Councils
Portland House
44 Richmond Road
Worthing
West Sussex
BN11 1HS



**amec
foster
wheeler**

Robert Deanwood
Consultant Town Planner

Tel: 01926 439078
n.grid@amecfw.com

Sent by email to:
planning.policy@adur-worthing.gov.uk

2 June 2016

Dear Sir / Madam

**Worthing Borough Council: Local Plan Issues and Options Consultation
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf.

We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:

Robert Deanwood
Consultant Town Planner

n.grid@amecfw.com

Amec Foster Wheeler E&I UK
Gables House
Kenilworth Road
Leamington Spa
CV32 6JX

Spencer Jefferies
Development Liaison Officer, National Grid

box.landandacquisitions@nationalgrid.com

National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

Yours faithfully

[via email]
Robert Deanwood
Consultant Town Planner

cc. Spencer Jefferies, National Grid

Gables House
Kenilworth Road
Leamington Spa
Warwickshire CV32 6JX
United Kingdom
Tel +44 (0) 1926 439 000
amecfw.com

Amec Foster Wheeler Environment
& Infrastructure UK Limited
Registered office:
Booths Park, Chelford Road, Knutsford,
Cheshire WA16 8QZ
Registered in England.
No. 2190074





REFERENCE
Comment number: WIO-M-8
Date received: 30/05/2016

Office Use only
Comment number:
Date received:

Your Town - Your Future
A new Local Plan for Worthing
Consultation Document May 2016
Comments Form

Worthing Borough Council has started work on preparing a new Local Plan which will have a big influence on the town in the period up to 2033. The publication of the 'Your Town - Your Future' consultation document provides the first opportunity to comment on relevant issues and options.

This consultation runs from **11th May to 22nd June 2016**

- Website: www.adur-worthing.gov.uk/worthing-local-plan
- Email: please email this completed form to worthinglocalplan@adur-worthing.gov.uk
- Phone: 01903 239999
- Address: Planning Policy Team, Worthing Borough Council,
Portland House, 44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	Janice		
Last name	Jones		
Organisation (where applicable)			
Address line 1	[REDACTED]		
Address line 2	[REDACTED]		
Address line 3			
Postcode	[REDACTED]	Telephone	[REDACTED]
Email address	[REDACTED]		

You can respond to this consultation online or by email. However, if your preference is to make comments manually this form can be photocopied as many times as necessary.

To keep you informed on progress all respondents will be added to the Worthing Planning Policy consultee database unless you request otherwise.

Use of information: Names and comments we receive will be available for public inspection and may be reported publicly as part of the Local Plan process. Contact details will not be published. Further information about how personal information is processed can be found on the Council's website. Unfortunately we cannot accept or report confidential or anonymous responses. All data will be stored securely in line with the Data Protection Act 1998.

Section B - Comments

The consultation document summarises issues and options within thematic sections. General comments can be inserted in the box below and comments about specific sections of the Plan can be made in response to some key questions that follow.

I wish to register my **OBJECTION** to the development of sites 1, 2 & 3 on the edge of town development opportunity.

- Using Beeches Avenue and the Worthing Football Club as an access road would be a disaster with the possibility of an extra 180 cars using the junction on and off the A27. This part of the road is far too congested as it is. The extra traffic will cause chaos right along the A27 and A24 not just at Lyons Farm. The Highways Agency has already objected to a previous and identical application.
- Children and other pedestrians will find it impossible to access all the local amenities that are situated south of the A27 safely without further accidents. GP surgeries and schools are over stretched as it is without this proposed new housing estate.
- These sites are an important and integral part of the land that includes Areas of Outstanding natural beauty. Building on this elevated site will have an adverse impact on views in and out of the AONB.

VISION

Q1a - Do you agree with the Vision we are aiming and aspiring to achieve?

Q1b - Does it provide a clear direction for the Worthing Local Plan?

Q1c - Is there anything you think we have missed which you would like to see incorporated in the Vision?

STRATEGIC OBJECTIVES

Q2a - Do you agree with the proposed objectives set out above? If not, what changes would you like to see?

Q2b - Are the objectives sufficiently distinctive and locally specific?

ECONOMY

Q3a - Do you agree with the key challenges identified for the economy? Are any missing?

Q3b - Should the Local Plan continue to protect key employment areas or should it be more flexible in its approach?

Q3c - In addition to the sites already identified as having the potential to deliver employment land are there any other sites that could accommodate employment growth?

RETAIL AND THE TOWN CENTRE

Q4a - Have all the key challenges for retail areas and the Worthing town centre been identified, if not what has been missed?

Q4b - Are retail centres functioning well - how can they be improved?

Q4c - How could new development in the town centre enhance the town's identity and attract more visitors?

TOURISM

Q5a - Have the key challenges for tourism been addressed?

Q5b - In what ways can the tourism offer be improved?

COMMUNITY AND LEISURE FACILITIES

Q6a - Do you agree with the main challenges identified in planning for the provision of different infrastructure needs? Are any missing?

Q6b - Do you have suggestions for how the Local Plan could resolve these?

Q6c - Are you aware of any particular community and leisure needs?

TRANSPORT

Q7a - Do you agree with the main challenges identified? Are any missing?

Q7b - Do you have any suggestions for how the Local Plan could better promote sustainable transport?

ENVIRONMENT
Q8a - Do you agree with the main environmental challenges identified? Are any missing?
Q8b - Do you have any suggestions for how the Local Plan could reach a balance between competing needs?
Q8c - Are there any circumstances you consider where regardless of mitigation, development would be inappropriate?
Q8d - What value do you place on the borough's green spaces, particularly those around the town?

HOUSING
Q9a - Should housing delivery be given higher priority than other development needs (e.g. employment land, community facilities)?
Q9b - How should we best address specialist housing needs (e.g. affordable housing; family housing; self-build housing; sheltered & extra care; houses in multiple occupation)?
Q9c - Efficient use of land will help to raise densities and will contribute towards meeting development needs. What potential impacts of this should the Council try to mitigate?
Q9d - Should the Council include a policy that would resist the inappropriate development of residential gardens?

DEVELOPMENT OPTIONS WITHIN THE TOWN
Q10a - Do you agree that the sites listed above provide the most significant redevelopment and regeneration opportunities to deliver housing, employment and leisure uses within the town?
Q10b - Do you have any particular comments on how any of the identified sites should be developed and for what mix of uses?
Q10c - Are there any other potential development sites within the current built up area that should be assessed?

EDGE OF TOWN DEVELOPMENT OPPORTUNITIES
Q11a - Given the housing needs in the Borough do you have any views as to which of these sites should be developed or protected?
See my comments under Section B
Q11b - If any of these sites (in full or in part) are to be allocated for development do you have any views on how they should be developed?

Q11c - If any of these sites are not allocated for development do you have any views on how they should be protected, enhanced or used?

Q11d - Land West of Fulbeck Avenue (site 7) and Land north of West Durrington (site 8) are already within the Built Up Area boundary. In light of significant housing needs should the Council take a positive approach and look to bring forward these sites in advance of the adoption of the new Local Plan?


PLANNING POLICIES

Q12a - Do you have any views on how any of the listed policies should be worded?

Q12b - Are there any policies missing from the list?

Q12c - Are all of the listed policies required?

Please continue on separate sheets as necessary

Name:	Mrs Janice Jones	Signature	
Date:	30th May 2016		



REFERENCE

Comment number: WIO-M-9

Date received: 06/06/2016

Office Use only

Comment number:

Date received:

Your Town –Your Future

**A new Local Plan for Worthing
Consultation Document May 2016
Comments Form**

Worthing Borough Council has started work on preparing a new Local Plan which will have a big influence on the town in the period up to 2033. The publication of the 'Your Town-Your Future' consultation document provides the first opportunity to comment on relevant issues and options.

This consultation runs from 11th May to 22nd June 2016.

Website: www.adur-worthing.gov.uk/worthing-local-plan

Email: worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	PEGGY	
Last name	PYLE	
Organisation (where applicable)		
Address line 1	[REDACTED]	
Address line 2		
Address line 3		
Post Code	[REDACTED]	Telephone [REDACTED]
Email address		

You can respond to this consultation online or by email. However, if your preference is to make comments manually this form can be photocopied as many times as necessary.

To keep you informed on progress all respondents will be added to the Worthing Planning Policy consultee database unless you request otherwise.

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Section B - Comments

The consultation document summarises issues and options within thematic sections and goes on to set out some key questions. Whilst comments are invited on all aspects of the emerging Local Plan it would help us if you could clarify which section of the document or which question you are responding to.

Separating and protecting the individuality of two communities (Goring/Ferring) and two councils (Worthing/Arun)

The gap offers ~~and interrupt~~ an uninterrupted and unique views from the sea to the South Downs.

Building would have a significant and detrimental effect on the character of the landscape.


Grade I agricultural land would be destroyed if developed.

Flood Risk

The gap is a habitat for sea birds and wading birds who are roosting or resting during migration times.

Rural environment with easy urban access.

Please continue on separate sheets as necessary

Name:	PEGGY E. PYLE	Signature	
Date:	6 th June 2016		

REFERENCE

Comment number: WIO-M-10

Date received: 07/06/2016

Robert Sharp [REDACTED]

7 Jun (2
days ago)

to me

Sent from my iPad B & T

.We would object to any development in the Goring Gap area as it would destroy one of the few remaining places where there are uninterrupted downs/sea views on this part of the coast.

A valuable amenity would be forever lost including agricultural land .

I fear there could be wildlife and bird life issues too.

[REDACTED]

REFERENCE

Comment number: WIO-M-11

Date received: 07/06/2016

Reginald W Fretwell [REDACTED]

7 Jun (2 days ago)

to me

Sirs,

I wish to place on record my objection to the development of either or both of the above areas.

Both the Goring/Ferring Gap and Chatsmore Farm spaces are fairly unique in that they have grade 1 agricultural land which would be destroyed in the event of any development.

There is a tendency to flooding on those lands which would involve considerable cost additions to any development and which will have a propensity to flood even after development.

We have, in our boundaries, little allowance for wild life. The two areas I refer to in this email are a place of welcome to sea birds and waders during both rest and roost time for them, particularly during migration.

The areas are a rural environment with easy urban access and have a unique view from sea to South Downs which any development will destroy.

Whilst housing is important, it is essential that we do not lose sight of our need for space. Both the Goring/Ferring Gap and Chatsmore Farm should be preserved to provide us with just a small space for all the reasons I have stated above. In doing so they will continue to provide separation of the Worthing and Arun Councils as well as Worthing and Ferring.

Reginald William Fretwell,
[REDACTED]

REFERENCE

Comment number: WIO-M-12

Date received: 09/06/2016

Donald Pedley [REDACTED]

20:38 (11 hours ago)

to me

From Donald & Katherine Pedley,
[REDACTED]

Response to Question 11. Edge of town development opportunities. Goring Gap South side and Chatsmore Farm pages 28-32.

We believe these areas should definitely be protected as greenfield sites. We agree with observations on the local plan that any development on these sites would have a significant and detrimental effect on the character of the landscape.

The Gap offers uninterrupted and unique views from the sea to the South Downs National Park.

These areas comprise Grade 1 agricultural land which would be destroyed if developed.

The Gap separates and protects the individual character of two communities - Goring and Ferring - and two councils, Arun and Worthing.

The Gap is a significant habitat for wildlife. Sea birds and wading birds roost and rest here during migration. It is also an area where rare Skylarks nest each year.

Some parts of the areas in question are at risk of flooding and therefore unsuitable for development.

Donald & Katherine Pedley.

Please acknowledge receipt of this email.

Many thanks.

Sent from AOL Mobile Mail

NB Mr Pedley emailed (10/06/16) to confirm that there was a typing error in his original email and the beginning of the second paragraph should read 'uninterrupted' rather than 'interrupted'.

REFERENCE

Comment number: WIO-M-13

Date received: 09/06/2016

Dear Tracy

Thank you for Ian Moody's letter of 11th May to provide us with an opportunity to comment on the 'Your Town – Your Future' consultation document. The aim of this document is clearly to canvass the views of residents, businesses, developers and other stakeholders who have a direct interest in the future of Worthing which we, as a neighbouring local authority, do not.

Whilst we therefore do not propose to offer you a detailed response, we are nevertheless pleased to see you making progress with the review of the Worthing Local Plan and, in the spirit of our Adur-Worthing Duty to Cooperate Memorandum of Understanding, we are happy to continue our engagement with you as work on the plan progresses.

Regards

John Cheston
District Plan Project Manager
Planning Policy and Economic Development

01444 477067

John.Cheston@midsussex.gov.uk

www.midsussex.gov.uk



REFERENCE

Comment number: WIO-M-14

Date received: 10/06/2016

Date received:

Your Town –Your Future

A new Local Plan for Worthing
Consultation Document May 2016
Comments Form

Worthing Borough Council has started work on preparing a new Local Plan which will have a big influence on the town in the period up to 2033. The publication of the 'Your Town- Your Future' consultation document provides the first opportunity to comment on relevant issues and options.

This consultation runs from 11th May to 22nd June 2016.

Website: www.adur-worthing.gov.uk/worthing-local-plan

Email: worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
 44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name <i>/s</i>	<i>Harry & Jean</i>
Last name	<i>STRATTON</i>
Organisation (where applicable)	<i>Gains Resident Assn</i>
Address line 1	[REDACTED]
Address line 2	
Address line 3	
Post Code	
Email address	

You can respond to this consultation online or by email. However, if your preference is to make comments manually this form can be photocopied as many times as necessary.


To keep you informed on progress all respondents will be added to the Worthing Planning Policy consultee database unless you request otherwise.

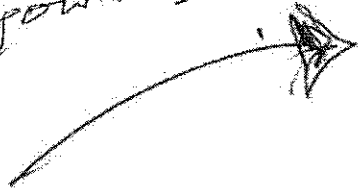
Use of information: Names and comments we receive will be available for public inspection and may be reported publicly as part of the Local Plan process. Contact details will not be published. Further information about how personal information is processed can be found on the Council's website. Unfortunately we cannot accept or report confidential or anonymous responses. All data will be stored securely in line with the Data Protection Act 1998.

P.V.D. →


Section B - Comments

The consultation document summarises issues and options within thematic sections and goes on to set out some key questions. Whilst comments are invited on all aspects of the emerging Local Plan it would help us if you could clarify which section of the document or which question you are responding to.

 ATTACHED ^{2 pages}
I think the comments
and letters I wrote
to Development Management
re planning application
AND M/0614/0614/16
Explains ~~our~~ how it
should be -
our town - our future



Please continue on separate sheets as necessary

Name:	H. STRATTON Harry	Signature	
Date:	9/6/16		

Prime seafront spot could be converted into caravan pitches

Oil Poole
 Deputy political editor
 01903 222347

Plans to convert a seafront field into a camping and caravan site would be 'grossly intrusive' and 'encroach' into a strategic gap, objectors have warned.

Applicant Sylvatica Ltd hopes to secure planning permission for a 46-pitch facility on land to the north of Marine Drive, Goring, east of Amberley Drive.

Documents submitted to Worthing Borough Council by Sylvatica argue it would provide a 'much-needed tourist facility', with economic benefits outweighing its visual impact.

But Ferring Conservation Group - alongside several residents - believe it would be 'completely out of character'.

Group vice chairman

Ed Miller, in an official representation, said: "Such a development would be grossly intrusive and completely out of character in a unique landscape of high scenic value and wildlife importance."

Ferring resident Jane Melvin, in another objection, said the plans would be 'an encroachment into a strategic gap' and set a precedent for other, similar developments.

But Sylvatica stated such an area was the only suitable place for the facility, with no space within the existing built-up area.

The presence of campervans and motorhomes has been a contentious issue in recent months, with steps taken by West Sussex County Council to stop them parking overnight.

One of the hotspots was Marine Drive - and Sylvatica's documents notes the issue.

The application design and access statement read: "Their relocation into a properly managed site would have benefits to the visual amenities of the area."

"It is better that such vehicles be parked in a properly landscaped setting rather than in a somewhat haphazard fashion on the public highway."

Sylvatica believes the site could contribute £500,000 to the local economy, given its desirable location.

Goring councillor Mark Nolan declined to offer his opinion on the application because it was ongoing.

"He said: 'Local residents will know my thoughts but, as with all planning applications, now that a formal application has been submitted, we must allow due process to take place before commenting further.'"

Worthing Herald
your photographer
photographed the
wrong side of Marine
Drive making it look
a deserted area.

Just look at the map
 To realise it is not the place for a prime Seafront area. that should not have been part of The Gap converted to a caravan pitch. Your reporting I think should have Shown 2 sides of the coin. This late "NEWS" 19/5 - when the hearing is on the 30th! This sound more like PR for Sylvatica!

NO OVERNIGHT CAMPING OFFENDERS WILL BE PROSECUTED AND VEHICLES WILL BE REMOVED

This does the job - Legally - keeps it to a minimum (certainly a lot less than 46 caravans)

That's where the site will be here

Go even greener a beautiful park - for generations to come BURISHOV quite a populated AREA

- A • Aldsworth
- W • Withdean
- AR • Arlington Avenue
- P • Petworth
- C • Chelwood Avenue
- AM • Amberley Drive
- S • Sea Lane
- M • Marine Drive
- I • Ilex Way
- AS • Ashhurst
- F • Falmer
- G • Goring Hall Hospital

This land could be converted into a caravan site

See comment B
Please Turn over
for Section COMMENTS
see the attached
pages

From

Date

To: Adur and Worthing Councils
Development Management
Portland House, 44 Richmond Road
Worthing, West Sussex BN11 1HS

REFERENCE – PLANNING APPLICATION NO: AWD/0614/16
WORTHING BOROUGH COUNCIL

With reference to the application above the answer to this project, has got to be NO. The planning department most definitely should not allow this - commercial intrusion to blight the wonderful pleasant neighbourhood of Goring. We are somewhat surprised as to why you should even consider the planning application AWD/0614/16, as it is assumed it was rejected in 2014 and the 16 is present day.

We feel saddened that the Worthing Borough Council is even considering this commercial application "46 pitches for caravans and Camping Site – Erection of amenity block building, comprising of toilets, showers, laundry room, store, office reception – plus construction of vehicle crossover and provision for parking and bin storage area". An application that if granted will be not only "grossly" intrusive it will also "grossly" lower the quality of our environment and, we will feel even sadder and frustrated by the lack of fulfilment if the commercial development passes through. For all of us who dwell here permanently – paying our council taxes, whilst 46 caravans and campers spoil the area, and will erode the value of our homes.

So please planning council – DO NOT let this foreboding disaster to happen. We think also that you should definitely preserve the GORING GAP – WHY NOT MAKE IT green. A wonderful park say to enhance the neighbourhood, for all people to enjoy. NOT A COMMERCIAL ORGANISATION with 46 caravans parked for visitors and campers!

Signed

1 of 2 ↓



REFERENCE

Comment number: WIO-M-15

Date received: 10/06/2016



Office Use only

Comment number:

Date received: 10/06/16

Your Town –Your Future

**A new Local Plan for Worthing
Consultation Document May 2016
Comments Form**

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This consultation runs from 11th May to 22nd June 2016.

Website: www.adur-worthing.gov.uk/worthing-local-plan

Email: worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House,
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	JESSE Charles Victor
Last name	LYONS
Organisation (where applicable)	-
Address line 1	
Address line 2	
Address line 3	
Post Code	
Email address	

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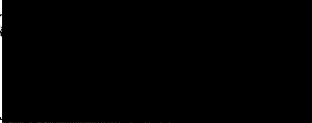
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Section B - Comments

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Section The Goring Gap, Chatsmore farm. P11
I agree that this greenfield site should be protected from development of any kind. The fields should remain as arable farm land and there should be no change of use, now or in the future. This should become a protected site for habitation of wild animals & birds.

Please continue on separate sheets as necessary

Name:	J Lyons.	Signature	
Date:	6 June 2016.		



REFERENCE

Comment number: WIO-M-16

Date received: 10/06/2016

Office Use only

Comment number:

Date received: 10/06/16

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Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name &

MARTIN & JULIA

Last name

JOHNSON

Organisation
(where applicable)

— GORING RESIDENTS

Address line 1

Address line 2

Address line 3

Post Code

Email address

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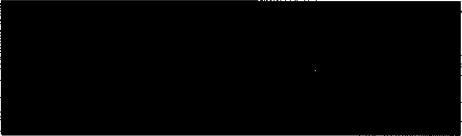
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RE GORING GAP NORTH AND SOUTH SIDE

WE BELIEVE THAT THESE GREENFIELD SITES SHOULD BE PROTECTED AND REMAIN AS THEY ARE FOR THE FOLLOWING REASONS

1. FOR RECREATION AND EXERCISE.
2. TO REMAIN ONE OF THE FEW AREAS UNCLUTTERED BY BUILDINGS TO ENJOY VIEWS, TRANQUILITY AND FRESH AIR.
3. A PLACE FOR WILDLIFE TO USE AND MIGRATE THROUGH.
4. EASY ACCESS WITHOUT DRIVING.
5. FOR HEALTHY WALKING AND CYCLING GROUPS TO ENJOY.
6. SHOULD BE RETAINED FOR FUTURE GENERATIONS.
7. HOUSING SHOULD BE CONSIDERED TO BROWN FIELD SITES, NOT GREEN AGRICULTURAL ONES.

Please continue on separate sheets as necessary

Name:	MARTIN & JULIA JOHNSON	Signature	
Date:	07/06/2016		



REFERENCE
Comment number: WIO-M-17
Date received: 13/06/2016

Date received: 10/06/16

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Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	MJUREEN
Last name	JACQUES
Organisation (where applicable)	/
Address line 1	[Redacted]
Address line 2	
Address line 3	
Post Code	
Email address	/

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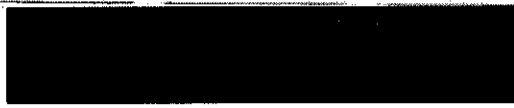
The Goring Gap South Side
+ Chatsmore Farm — Page 28-32 Q. 11

This gap is a unique asset for local residents (+ visitors). Please don't destroy it. Building would badly affect the character of the landscape + destroy Grade I agricultural land.

It separates the individuality of the 2 communities (Goring/Ferring) + the 2 councils concerned.

It is a habitat for sea birds + wading birds - again a priceless asset for residents + visitors alike. Worthing + Ferring should be proud of the gap + do all they can to preserve it for the present + future generations. Simple unadorned green space is a blessing - don't rip it up for some ugly building plots.

Please continue on separate sheets as necessary

Name:	Maureen Jacques	Signature	
Date:	8th June, 2016.		

REFERENCE

Comment number: WIO-M-18

Date received: 13/06/2016

Question page 32.

Q11: Edge of town development opportunities.



10/06/16

Dear Sir, or Madam,

I wish to express my grave concern regarding any potential building on the Goring Gap, South side and Chobson Farm.

The area provides a rural environment within easy access of the busy urban area, essential to the recreation and health of the local people.

It is also an important habitat for the many wading and sea birds, both for roosting and nesting at the time of migration.

Flooding occurs frequently in the local area during the wet periods and I believe is therefore unsuitable for development.

The whole character of the landscape as well as Grade 1 farm land would be destroyed if development took place.

The Gap and Chatsworth Farm offer unvalued views from the South Downs to the sea and both areas separate and protect the individuality of Boning & Ferris and the two councils of Worthing/Arundel.

I strongly advise against development on these two important areas of West Sussex.

Yours sincerely,

[Redacted Signature]



REFERENCE

Comment number: WIO-M-19

Date received: 13/06/2016

Comment number:

Date received:

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Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	VALERIE
Last name	LYONS
Organisation (where applicable)	-
Address line 1	
Address line 2	
Address line 3	
Post Code	
Email address	

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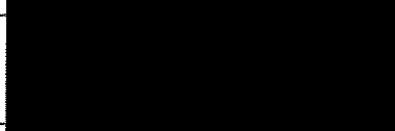
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Q 11 - Edge of town development opportunities

Goring Gap & Chatsmore Farm.

I think these two areas should be protected. Apart from being a beautiful green area with views to the South Downs, they provide a natural 'gap' between the communities of Goring & Ferring.

Please continue on separate sheets as necessary

Name:	VALERIE LYONS	Signature	
Date:	6th June 2016		

REFERENCE

Comment number: WIO-M-20

Date received: 11/06/2016

- Forwarded message -----

From: **Sheila Fennelly** [REDACTED]

Date: 10 June 2016 at 16:33

Subject: Protection of Goring Gap & Chatsworth Farm

To: helppoint@adur-worthing.gov.uk

Please pass this email to the issues and options consultation

The south coast has become a concrete jungle with less and less green lungs to combat more and more traffic pollution, and England's 'green and pleasant land' is fast disappearing under tarmac, bricks and glass. When you look from the South Downs towards Goring Gap and Chatsworth Farm at least one still has the uplifting experience of how beautiful the West Sussex coast once was and I can only beg the land grabbers to have a sense of humanity, community and decency and to keep their hands off this exquisite section of countryside.

So many people enjoy walking in the area and with the NHS pushing people to exercise more destroying one of the few areas left where people can enjoy the ambiance of the sea and countryside is disturbing. If the area was annihilated the health of a huge number of people would be affected because where else is there to walk for two or three hours and not be affected by diesel fumes?

There are many other common sense reasons for the area to be protected, including disappearing wildlife - only recently there has been a woodpecker's nest with a baby woodpecker, and the disappearing farmland. Please do not destroy our heritage!

Sheila Fennelly
[REDACTED]

REFERENCE

Comment number: WIO-M-21

Date received: 13/06/2016



Office Use only

Comment number:

Date received: 13-6-16

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Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	FRANCES (MARJORIE)
Last name	COCOZZA
Organisation (where applicable)	/
Address line 1	
Address line 2	
Address line 3	
Post Code	
Email address	

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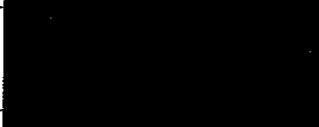
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QUESTION 11.

It is important to keep the two communities separate, i.e. GORING + FERRING as they come under two different councils.

It would be an absolute tragedy to spoil the beautiful view from the sea to the South Downs. Agricultural land would be swallowed up with "bricks + mortar" which in turn would lead to flooding as rainwater would be unable to drain away through concrete. This is apart from the eyesore of the proposed development, + the loss of habitat for birds + other wildlife.

Please continue on separate sheets as necessary

Name:	MARJORIE FRANCES COCOZZA	Signature	
Date:	9-6-16		



REFERENCE

Comment number: WIO-M-22

Date received: 13/06/2016

Comment number:

Date received: 13-6-16

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Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	MR PAUL & MRS GONILLA
Last name	SPARROW
Organisation (where applicable)	
Address line 1	
Address line 2	
Address line 3	
Post Code	
Email address	

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WE HAVE LIVED IN ALDWORTH AVENUE SINCE 1961
WE HAVE ENJOYED LIVING HERE AND WE ARE
VERY CONCERNED THAT THE OPEN SPACES GORING GAP
FOURTH SIDE AND CHATSMORE FARM WILL BE BUILT ON.

OUR REASONS ARE :-

(1) THAT THE GRADE 1 AGRICULTURAL WILL BE LOST
IF DEVELOPMENT IS ALLOWED


(2) THESE ARE SOME OF THE ONLY GREENSWARDS
LEFT IN THE SOUTH OF BRITAIN.

(3) WE WILL LOSE THE BEAUTIFUL RURAL LANDSCAPE
AND THE VIEWS OF THE DOWNS FROM THE GREENSWARD

(4) THE AREA IS SO IMPORTANT FOR BIRDLIFE,
WE HAVE SO MANY TYPES INCLUDING RED LEGGED
GROUSE AND MANY SEABIRDS, IT IS AN IMPORTANT
AREA FOR MIGRATING BIRDS.

(5) IT IS CRIMINAL THAT THIS BEAUTIFUL GREEN
AREA COULD BE LOST TO FUTURE GENERATIONS. PLEASE
PLEASE DO NOT ALLOW IT.

Please continue on separate sheets as necessary

Name:	PAUL SPARROW GUNILLA SPARROW	Signature	
Date:	9/6/16		



REFERENCE

Comment number: WIO-M-23

Date received: 13/06/2016

Date received: 13-6-16

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Address: Planning Policy Team, Worthing Borough Council, Portland House
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Section A - Contact Details

First name	STANLEY WILLIAM
Last name	ATTWELL
Organisation (where applicable)	RATE PAYER
Address line 1	
Address line 2	
Address line 3	
Post Code	
Email address	

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PAGE 32 Q11

ANY LARGE DEVELOPMENT WOULD NEED THE INFRASTRUCTURE SUCH AS SCHOOLS - HOSPITALS & P SURGIES TO BE BUILT FIRST, AS AT THE MOMENT THE EXISTING ONES CAN HARDLY COPE, ALSO GRADE ON AGRICULTURAL LAND WOULD BE LOST.

THE GAP ALSO PROTECTS THE INDIVIDUALITY OF THE COMMUNITIES OF GORING AND FERKING AND THE COUNCIL OF WORTHING AND FERKING

Q10 ANY REDEVELOPMENT OF THE H.R.P.C SITE SHOULD ENCOMPASS SOME ASSET FOR THE USE OF THE COMMUNITY SUCH AS SWIMMING POOL OR MEDICAL CENTRE

Please continue on separate sheets as necessary

Name:	S-WATTEWELL	Signature	
Date:	9-6-2016		



REFERENCE

Comment number: WIO-M-24

Date received: 13/06/2016

Comment number:

Date received: 13-6-16

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Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	LAURENCE & ELEANOR MILLWARD	
Last name	MILLWARD	
Organisation (where applicable)		
Address line 1		
Address line 2		
Address line 3		
Post Code		
Email address		

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Please see attached forms

Please continue on separate sheets as necessary

Name:	LAURENCE AND ELEANOR MILLWARD	Signature	
Date:	11/June/2016		

Worthing Local Plan

Q1 Vision

- a) We agree with the vision outlined in the objectives
- b) A clear direction has been provided
- c) The seafront still needs more improvement to welcome tourists to the town. Whilst it is important to have many types of eateries we must not go overboard and confine to 3 or 4 areas throughout the town centre.

Q2 Strategic Objectives

Community

- Housing is important but not the detriment to those already living in Worthing.
- All styles of housing are important and as new homes built will not include bungalows we would suggest that no development on existing bungalows be allowed i.e. allowing a bungalow to be turned into a house
- Good transport at affordable costs could cut back the need for car journeys.
- Any new development must integrate with the existing environment. It must also cater for everyone's needs i.e. medical care, schooling, transportation etc.,

Economy

- Some town centre shops need an upgrade. Although it's wonderful to have a market it can make the main area chaotic. Perhaps a relocation to Montague Place although you would need to close off the parking facilities
- Encourage more independent shops, have less pop up shops which are never clean, tidy, have poor lighting and give a very poor visual outlook on those shops in the same area who are permanent.
- Make more use of the Pavilion as it gives a look of being closed even when open

Environment

- It is imperative that valued green spaces are kept and the stretches of underdeveloped coastline are kept, otherwise the whole of Worthing will become a concrete jungle which several people have moved here, or want to visit to escape this type of hurley burley and this could affect the economy of the town

Q3 Economy

- a) All sizes and shapes of businesses should be catered for so that if one company fails it does not decimate the town economy and peoples livelihood should we only encourage larger companies to relocate here
- b) Employment should be protected, but should it be obvious that an area is not being used for employment then it should be considered for alternative uses
- c) There seems to be a lack of 'sea/sport/leisure type' activities in main Worthing which would provide employment and attract visitors to the sea front

Q4 Retail and the Worthing Town Centre

- a) The key challenges are been identified

- b) The town centre needs a good clean up to make it more attractive. Those coming to Worthing via train need to walk down dirty and unkempt roads, not a good first impression of Worthing. The flowers put out in summer are nice but overwhelmed by tatty shops visitors need to walk by.
- c) It must be made easier for visitors and residents to get to Worthing via public transport and perhaps have an out of town car park with park and ride facilities
- d) Perhaps a town plan of main shopping area with names and location of shops

Q5 Tourism

- a) The key challenges have been addressed
- b) Insufficient activities to attract children/families during the summer holidays. Whilst there are many things going on in Worthing in June/July there is none or vertically none during the August period.
There seems to be a lack of 'sea/sport/leisure type' activities in main Worthing which would provide employment and attract visitors to the sea front.
Jetty off pier to allow for trip boats to town, or out to Rampion site, or taxi service to Littlehampton, Brighton etc., or allow Paddle steamer to return to area
Town centre should be a place of safety during the evenings.
The Stein needs to be made more inviting for visitors
The signage in the town needs to be more geared to the visitor with maps of where shops are, how to get to Marine Gardens, how to get to Beach House park etc.,

Q6 Community and Leisure Facilities

- a) Leisure facilities are important to the health and wellbeing of all residents young and old. They also need to be in local communities convenient to the residents to access
- b) More information required on what and where leisure facilities are available and who to contact to get advise

Q7 Transport

- a) Transport will always remain a challenge
- b) At the moment traffic congestion is similar to all towns, Worthing needs to have conveniently located in-town car parks at reasonable prices to encourage tourism and use of Worthing shops.
Park and Ride may be a solution if an area can be found
A look at a safer cycle provision which does not impinge on pedestrian space and safety. Areas around town for cycles to be safely secured whilst cyclist using other facilities on offer

Q8 Environment

- a) There is a risk of flooding in Worthing and this must be considered when you look at places to build. We would suspect if more and more green spaces are taken away the flooding level would be more acute
- b) You must not build on known flood areas as insurance for property would be high and if flooded the emotional distress would be devastating. If no property insurance was

taken out due to costs and the owners were in need of rehousing could the council cope? Once you build on all the green spaces there will be lost areas that are considered important to the local community (Goring Gap) and a further erosion of our borough identity, it will just make Worthing a place full of houses, shops, work places but no green spaces to speak of which is just like all the other borough's along the south coast. What happens when all the green spaces are built on and this does not meet the demands - will we be forced to build massive blocks of flats, just like the ones in the 60/70's that were taken down as this bred loneliness, gang culture etc., The council must not build upwards to the detriment of those living in their shadow.

Q9 Housing

- a) Housing should not be given higher priority than other needs. For all housing built there must be other needs to be considered i.e. medical needs, schooling needs, community facilities such as local shops, play areas, places to work etc.,
- b) All types of housing needs to be considered which meets the needs of young and old
- c) All land should be used to its full potential but it must not be to the detriment of the existing community, the style of properties and the character of the area
- d) The council should have a policy which would resist any inappropriate development and this must include residential gardens. Too many properties on top of each other could make an area look like an overcrowded slum

Q10 Development options within the town

- a) The brown field sites seem to be the only opportunities available for development within the area 'centre of town'. Along with development consideration must be given for sufficient parking, public transport requirements
- b) Seems to be a fair mix of uses
- c) None known

Q11 Edge of town development opportunities

- a) The site which must have the most protection is the Goring Gap - south and north known as Chatsmore Farm. Any development of these sites would give you a short term gain in the housing need but it would be a long term devastation of a unique piece of land. Some of this land is a flood area which could cause problems for those who purchase properties on this land. But, remember once this piece of land goes it will never ever be got back which we are sure in the future environmentalist would 'dam' us for
- b) If the area had to be developed then only a partial development should happen, this would be a compromise and not something the local residents would welcome or easily accept.
- c) Goring Gap - south and north should be protected as a valuable and unique piece of countryside. The gap already provides nature facilities as a habitat for sea birds and wading birds. It provides leisure activities such as dark sky watchers, about the only place in Worthing this can happen in, miniature plane flyers, whilst giving residents and visitors a visual link from the sea to the open countryside of the South Downs.

- d) Both areas are already built up and if any further development takes place there must be greater consideration if local infrastructure can cope with further population i.e. medical, schools, off street parking, public transport etc.,

Q12 Planning policies

- a) Completing this local plan, we are sure, must have been a very difficult plan to write and we recognise it is a complicated document for members of the public to comment on.
- b) The list seems sufficient, although there should be a policy about, or included within another policy about any inappropriate development and this must include residential gardens
- c) Like all large organisations there are far too many policies and not enough. Policies need to be checked on a regular basis to make sure they continue to meet the needs of the community at that present time and for future years. You must also realise that not all policies meet all requirements and common sense must also be present at every step along the way



REFERENCE

Comment number: WIO-M-25

Date received: 13/06/2016

Comment number:

Date received: 13/6/16

Your Town –Your Future

**A new Local Plan for Worthing
Consultation Document May 2016
Comments Form**

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This consultation runs from 11th May to 22nd June 2016.

Website: www.adur-worthing.gov.uk/worthing-local-plan

Email: worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	ELIZABETH
Last name	MILLWARD ON BEHALF OF
Organisation (where applicable)	GORING RESIDENTS ASSOCIATION.
Address line 1	
Address line 2	
Address line 3	
Post Code	
Email address	

You can respond to this consultation online or by email. However, if your preference is to make comments manually this form can be photocopied as many times as necessary.

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Section B - Comments

The consultation document summarises issues and options within thematic sections and goes on to set out some key questions. Whilst comments are invited on all aspects of the emerging Local Plan it would help us if you could clarify which section of the document or which question you are responding to.

Please see attached sheets - 3 in total
all marked GRA

Please continue on separate sheets as necessary

Name:	ELIZABETH MILLWARD	Signature	
Date:	15 June 2016		

Worthing Local Plan Consultation

Q1. Vision

- A) I/We agree with the Vision outlined in the objectives.
- B) A clear direction has been provided.
- C) Regarding the regeneration of the town centre care needs to be taken that there is a wide range of facilities available for the local community and visitors, the seafront is important to the town and needs further development to fulfil the Vision outlined. The limited land resources mean the surrounding countryside needs to be fully protected and any land used for development is used to its fullest potential.

Q2. Strategic Objectives.

A) Community - regular, inexpensive public transport has been shown to reduce the number of car journeys.

Economy - large improvement in the town centre shopping is needed, perhaps encouraging specialist shops and business to the area and increasing the age range appeal of the cultural activities in the town.

Environment- the public facilities need to be improved along the whole seafront and land should be redeveloped to its full potential to justify the protection of the remaining green spaces.

B) As long as each area is looked at on its own merits.

Q3. Economy.

A) The lack of available land for development may mean that larger business and retail outlets may reluctant to base in

Worthing and therefore smaller businesses may well be of more importance.

b) Where ever possible employment should be protected.

c) Sport and leisure activities linked to one of Worthing's assets the sea and sea front, could provide employment and attract visitors.

Q.4. Retail and Worthing Town Centre

a) The key challenges have been identified.

b) The retail centres need to be modernised and made more visually attractive.

c) Worthing needs to identify its own character rather than competing with others nearby, by improving shopping centres and making it easy for visitors to get here by car, park and ride and or public transport links.

Q.5. Tourism

a) The tourism challenges have been addressed but there needs to be activities to attract a wide range of ages.

b) Tourism could be improved by offering more sea and water activities in the town and the town centre to be a vibrant, pleasant and safe place to visit at night.

Q.6. Community and Leisure Facilities.

a) Leisure facilities are important to the health and wellbeing of the local communities.

b) Perhaps people could be given more information of what is available.

c) Provision of water activities, themed weekend courses.

Q.7. Transport

a) Traffic needs to flow reasonably well or it can blight the development of the town, therefore residents should be encouraged to use public transport have safe cycle provision that does not impinge on pedestrian space and safety.

b) Park and ride schemes, hop on and hop off bus services in the town centre could promote more sustainable transport.

Q.8.Environment.

a) The risk of flooding will increase in the future. There are already areas of Worthing that regularly suffer localised flooding that are not recognised as having a problem.

b) c) and d) Developing areas of flood risk is irresponsible, as the costs both emotionally and financially are the distressing to those affected. Once our green spaces are built over there will still be a land shortage and the town will have lost areas that are important to the communities that have urged for protection. The development of greenspaces will only help in the short term, but to the great detriment of the town.

Q.9. Housing.

a) Housing should not be given sole priority as people need employment and facilities where they live otherwise a sterile environment is created that can lead to problems in the future.

b) All types of housing have to be included so that there is a balanced population, both young and old.

c) While land has to be used to its full potential care must be taken that it is not too great a contrast to the neighbouring properties.

d) Each garden development should be looked at carefully to assess the impact on the surrounding properties and the character of the area.

Q.10. Development options within the town

a) The brown field sites are really the only opportunities currently available for development within the centre of town.

b) The usage identified in the plan seems to provide a good mix of usage.

c) Unaware of any other possible development sites.

Q.11. Edge of Town Development Opportunities.

a) Ideally all of the sites identified should be protected, some of the sites are on the outer edges of the town and are countryside in nature, and these sites should be protected. The Goring Gap both North and South would definitely fall into this category. The development of these sites would do little to alleviate in the short term the housing problems that Worthing face, their loss however would be immeasurable in the future.

b) If there was development, I/we would be highly resistant to that development. There should be only partial development so that some of the site is retained. This would be a compromise and not something that would be welcomed or easily accepted.

c) Goring Gap both North and South should be protected as a valuable area of countryside within easy access of the local and greater communities. The land should be protected from

development. The site could provide nature facilities, an educational nature environment as well leisure opportunities for visitor and residents whilst retaining its open countryside visual link from the sea to the South Downs National Park.

d) It is unfortunate that the land West of Fulbeck Ave has been included for development but the area has recently undergone a large redevelopment so this could be justified.

Q.12. Planning Policies.

a) It is clear that care has been taken to try to make a complex issue clear, and it has to be recognised that it is a complicated issue for members of the public to respond to.

b) The list is very comprehensive. In transport and connectivity, parking should be mentioned as the provision or lack of has implications for the town centre.

c) All of these policies are required, there are problems in Worthing with mobile phone reception, there are serious flooding issues facing the town in the future and it is imperative that good use be put to the remaining land for development and that the areas of green are retained for the future.



REFERENCE

Comment number: WIO-M-26

Date received: 13 /06/2016

Comment number:
Date received: 13-6-16

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Email: planning@worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House,
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	JOHN + CATHERINE	
Last name	PORTER	
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Address line 3		
Post Code		
Email address		

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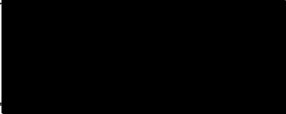
QUESTION 11

The Goring Gap + Chatsmore Farm.

We would like to register our request to protect
The Goring Gap + Chatsmore Farm. There are quite
a few reasons why:

1. Flooding Risk
 2. The fabulous views from the Sea to South Downs.
This is the only view left that you can stand
on the beach and see the Downs. If it goes the
South-east will be just solid concrete plate to
flooding.
 3. The habitat for our sea birds who migrate at
certain times.
 4. Agricultural land would be destroyed if it
were developed.
- Let's look after our environment for generations to come.

Please continue on separate sheets as necessary

Name:	John Porter Catherine Porter	Signature:	
Date:	10 June 2016		

REFERENCE

Comment number: WIO-M-27

Date received: 10/06/2016

Michael Seagrave [REDACTED]

10 Jun (3
days ago)

to me

The Goring Gap South side and Chatsmore Farm - Q11 Edge of town development opportunities

I support that these Greenfield sites should be protected and remain as they are for the following reasons -

Separating and protecting the individuality of two communities and two councils.

The gap offers an uninterrupted and unique views from the sea to the South Downs.

Building would have a significant and detrimental effect on the character of the landscape.

Grade 1 agricultural land will be destroyed if developed.

There is a flood risk.

The gap is a habitat for sea birds and wading birds during migration times.

Rural environment with an easy urban access.

REFERENCE

Comment number: WIO-M-28

Date received: 10/06/2016

Sompting Clerk <clerk@sompting.org.uk>

10 Jun (3 days ago)

to me

Please find attached the response to your authority's Stage 1 Local Plan consultation

David Porter

Parish Clerk and Responsible Finance Officer Sompting Parish Council Old School House,
Harriet Johnson Centre, Loose Lane, Sompting, West Sussex, BN15 0BG Tel 07813484857

Your Town - Your Future

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Email: please email this completed form to worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council,
Portland House, 44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	David		
Last name	Porter		
Organisation <i>(where applicable)</i>	Sompting Parish Council		
Address line 1	Old School House		
Address line 2	Harriet Johnson Centre		
Address line 3	18 Loose Lane, Sompting		
Postcode	BN15 0BG	Telephone	07813484857
Email address	clerk@sompting.org.uk		

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Section B - Comments

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VISION

Q1a - Do you agree with the Vision we are aiming and aspiring to achieve?

Q1b - Does it provide a clear direction for the Worthing Local Plan?

Q1c - Is there anything you think we have missed which you would like to see incorporated in the Vision?

STRATEGIC OBJECTIVES

Q2a - Do you agree with the proposed objectives set out above? If not, what changes would you like to see?

- a) Environment: Sompting Parish Council agrees with the bullet points under this objective with the following points to be included.
1. Bullet point 1 this should include the Worthing/Sompting gap.
 2. Bullet point 3. Brownfield sites must be used for development first so that the rest of this objective can be fulfilled but with the additional recognition for the Worthing/Sompting gap's physical and environmental constraints.
 3. Bullet point 6. This is essential if the edge of town development opportunity number 3 Upper Brighton Road is ever identified as a potential allocated site. The surrounding infrastructure cannot cope with the existing traffic pressures. The Parish Council's Neighbourhood Plan promotes cycle routes and new footpaths which relate to the area in question.

Q2b - Are the objectives sufficiently distinctive and locally specific?

See above

ECONOMY
Q3a - Do you agree with the key challenges identified for the economy? Are any missing?
Yes
Q3b - Should the Local Plan continue to protect key employment areas or should it be more flexible in its approach?
Yes
Q3c - In addition to the sites already identified as having the potential to deliver employment land are there any other sites that could accommodate employment growth?
c) Potential for delivery employment land in the region of East Worthing Industrial Estate should not be dependent on the resurrection of the EWAR.

RETAIL AND THE TOWN CENTRE
Q4a - Have all the key challenges for retail areas and the Worthing town centre been identified, if not what has been missed?
Yes
Q4b - Are retail centres functioning well - how can they be improved?
Yes
Q4c - How could new development in the town centre enhance the town's identity and attract more visitors?

TOURISM
Q5a - Have the key challenges for tourism been addressed?
Q5b - In what ways can the tourism offer be improved?

COMMUNITY AND LEISURE FACILITIES
Q6a - Do you agree with the main challenges identified in planning for the provision of different infrastructure needs? Are any missing?
Q6b - Do you have suggestions for how the Local Plan could resolve these?
Q6c - Are you aware of any particular community and leisure needs?

TRANSPORT
Q7a - Do you agree with the main challenges identified? Are any missing?
a) Main challenges: It is noted that transport is one of the major issues when considering where new development should occur. However, to rely on development to provide the answer the failings of Highways England and West Sussex County Council in dealing with the existing situation at the eastern part

of the Borough means that no advancement in resolving these issues will be achieved until development is approved. No new housing or industrial development should be considered as a possibility until the main matters of that area are sorted.

It is noted that the A27 requires measures to address congestion and safety issues and a transport study is to be instigated but any transport study must include the existing problems in Upper Brighton Road/ West Street and beyond due to the A27 and any future development in association with number 3 Upper Brighton Road area and within Adur District. These roads and the surrounding residential roads, the existing traffic light junction of the Lyons Farm are already congested and must have careful consideration in any transport plan/study. Any new housing development occurring in this area will only increase the problem.

Q7b - Do you have any suggestions for how the Local Plan could better promote sustainable transport?

Promotion of alternative modes of travel can be an answer and should be pursued but not relied on as the answer due to the population's reliance on the car.

ENVIRONMENT

Q8a - Do you agree with the main environmental challenges identified? Are any missing?

- a) Any new development occurring in the Borough's eastern areas must have an impact on the Southern Water's sewage treatment works. These works have already shown failings resulting in pollution of the sea and beaches.
- The strategic gap of Worthing/Sompting must be protected, not developed on. The gap provides the best natural break between settlements. Any encroachment by moving the built up area boundary would be contrary to this objective.
- To allocate development on land of lesser environmental value should not include low grade farmland but should only be based on brownfield sites.

Q8b - Do you have any suggestions for how the Local Plan could reach a balance between competing needs?

The Borough Council should report to the Government that insufficient land is available to provide the required housing numbers.

Q8c - Are there any circumstances you consider where regardless of mitigation, development would be inappropriate?

- a) Upper Brighton Road – issues with transport, environment and reduction of open space ie the gap

Q8d - What value do you place on the borough's green spaces, particularly those around the town?

HOUSING

Q9a - Should housing delivery be given higher priority than other development needs (e.g. employment land, community facilities)?

- a) Housing should be given equal priority as all development needs have an impact to each other. Pressure given for housing from "windfall" sites should not alter that stance.

Q9b - How should we best address specialist housing needs (e.g. affordable housing; family housing; self-build housing; sheltered & extra care; houses in multiple occupation)?

- a) These need to be included within development sites not isolated. By this a better closer

community is developed (hopefully)

Q9c- Efficient use of land will help to raise densities and will contribute towards meeting development needs. What potential impacts of this should the Council try to mitigate?

- a) Potential impacts have been described above but include the impact on the adjoining Sompting's conservation area.

Q9d - Should the Council include a policy that would resist the inappropriate development of residential gardens?

- a) That would depend on the number of properties that are to be provided by this method. Council owned properties can have large unmanaged gardens and these could be used to provide specialist housing needs. Allotments should not be included by an umbrella policy.

DEVELOPMENT OPTIONS WITHIN THE TOWN

Q10a - Do you agree that the sites listed above provide the most significant redevelopment and regeneration opportunities to deliver housing, employment and leisure uses within the town?

Q10b - Do you have any particular comments on how any of the identified sites should be developed and for what mix of uses?

Q10c - Are there any other potential development sites within the current built up area that should be assessed?

EDGE OF TOWN DEVELOPMENT OPPORTUNITIES

Q11a - Given the housing needs in the Borough do you have any views as to which of these sites should be developed or protected?

The strategic gap of Worthing/Sompting should not be developed in the manner suggested (Upper Brighton Road). This will only create a ribbon of development as pressure to develop over the term of the Plan increases.

Q11b - If any of these sites (in full or in part) are to be allocated for development do you have any views on how they should be developed?

Not developed.

Q11c - If any of these sites are not allocated for development do you have any views on how they should be protected, enhanced or used?

- a) Upper Brighton Road should be protected by a policy on Local Green Spaces. It can then be developed in a public accessible environmentally manner but not sport related.

Q11d - Land West of Fulbeck Avenue (site 7) and Land north of West Durrington (site 8) are already within the Built Up Area boundary. In light of significant housing needs should the Council take a positive approach and look to bring forward these sites in advance of the adoption of the new Local Plan?

PLANNING POLICIES

Q12a - Do you have any views on how any of the listed policies should be worded?

Q12b - Are there any policies missing from the list?
Q12c - Are all of the listed policies required?

Please continue on separate sheets as necessary

Name:	David Porter, Clerk to Sompting Parish Council	Signature	<i>D.A.Porter</i>
Date:	9th June 2016		



REFERENCE
Comment number: WIO-M-29
Date received: 13/06/2016

Office Use only
Comment number:
Date received:

Your Town - Your Future
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Consultation Document May 2016
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Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council,
Portland House, 44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	Norman
Last name	Watson
Organisation (where applicable)	N/A
Address line 1	
Address line 2	
Address line 3	
Postcode	
Email address	

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Section B - Comments

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My comments only cover the area of the Goring / Ferring gap and Chatsmore farm

VISION

Q1a - Do you agree with the Vision we are aiming and aspiring to achieve?

Yes

Q1b - Does it provide a clear direction for the Worthing Local Plan?

Yes

Q1c - Is there anything you think we have missed which you would like to see incorporated in the Vision?

All of this land must be protected from development which would destroy the flora and fauna.

STRATEGIC OBJECTIVES

Q2a - Do you agree with the proposed objectives set out above? If not, what changes would you like to see?

Yes

Q2b - Are the objectives sufficiently distinctive and locally specific?

Yes

ECONOMY

Q3a - Do you agree with the key challenges identified for the economy? Are any missing?
Yes
Q3b - Should the Local Plan continue to protect key employment areas or should it be more flexible in its approach?
Yes
Q3c - In addition to the sites already identified as having the potential to deliver employment land are there any other sites that could accommodate employment growth?
No

RETAIL AND THE TOWN CENTRE
Q4a - Have all the key challenges for retail areas and the Worthing town centre been identified, if not what has been missed?
Q4b - Are retail centres functioning well - how can they be improved?
Q4c - How could new development in the town centre enhance the town's identity and attract more visitors?

TOURISM
Q5a - Have the key challenges for tourism been addressed?
Tourism must always be at the top of the pile as it is one of the lifebloods to Worthing's survival.
Q5b - In what ways can the tourism offer be improved?
To make the town and its environs more attractive.

COMMUNITY AND LEISURE FACILITIES
Q6a - Do you agree with the main challenges identified in planning for the provision of different infrastructure needs? Are any missing?
Cannot think of any at the present time.
Q6b - Do you have suggestions for how the Local Plan could resolve these?
Q6c - Are you aware of any particular community and leisure needs?

TRANSPORT
Q7a - Do you agree with the main challenges identified? Are any missing?
Q7b - Do you have any suggestions for how the Local Plan could better promote sustainable transport?

ENVIRONMENT

Q8a - Do you agree with the main environmental challenges identified? Are any missing?
No
Q8b - Do you have any suggestions for how the Local Plan could reach a balance between competing needs?
No
Q8c - Are there any circumstances you consider where regardless of mitigation, development would be inappropriate?
No
Q8d - What value do you place on the borough's green spaces, particularly those around the town?
High value. It should be one of the priorities to improving the area for all to use.

HOUSING
Q9a - Should housing delivery be given higher priority than other development needs (e.g. employment land, community facilities)?
No. Housing is a bit emotive, as it seems that priorities are given to those from afar.
Q9b - How should we best address specialist housing needs (e.g. affordable housing, family housing, self-build housing, sheltered & extra care, houses in multiple occupation)?
To ensure that our people are not left behind when housing is an issue.
Q9c - Efficient use of land will help to raise densities and will contribute towards meeting development needs. What potential impacts of this should the Council try to mitigate?
Q9d - Should the Council include a policy that would resist the inappropriate development of residential gardens?

DEVELOPMENT OPTIONS WITHIN THE TOWN
Q10a - Do you agree that the sites listed above provide the most significant redevelopment and regeneration opportunities to deliver housing, employment and leisure uses within the town?
Q10b - Do you have any particular comments on how any of the identified sites should be developed and for what mix of uses?
Q10c - Are there any other potential development sites within the current built up area that should be assessed?

EDGE OF TOWN DEVELOPMENT OPPORTUNITIES
Q11a - Given the housing needs in the Borough do you have any views as to which of these sites should be developed or protected?
Q11b - If any of these sites (in full or in part) are to be allocated for development do you have any views on how they should be developed?
Q11c - If any of these sites are not allocated for development do you have any views on how they should be protected, enhanced or used?

Q11d - Land West of Fulbeck Avenue (site 7) and Land north of West Durrington (site 8) are already within the Built Up Area boundary. In light of significant housing needs should the Council take a positive approach and look to bring forward these sites in advance of the adoption of the new Local Plan?


PLANNING POLICIES

Q12a - Do you have any views on how any of the listed policies should be worded?

Q12b - Are there any policies missing from the list?

Q12c - Are all of the listed policies required?

Please continue on separate sheets as necessary

Name:	Norman Watson	Signature	
Date:	13 th June 2016		

REFERENCE

Comment number: WIO-M-30

Date received: 14/06/2016



Office Use only

Comment number:

Date received: 14/6/16

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Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	MARK
Last name	CAVENEY.
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Address line 2	
Address line 3	
Post Code	
Email address	

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Section B - Comments

The consultation document summarises issues and options within thematic sections and goes on to set out some key questions. Whilst comments are invited on all aspects of the emerging Local Plan it would help us if you could clarify which section of the document or which question you are responding to.

REF - GORING GAP AND AREA REDEVELOPES @ D. @ U.

DEAR SIRS :

IT'S A PROVEN FACT THAT WOODED, OPEN, COUNTRY LAND IS A CALMING, REHABILITATION, RELAXING & BENEFIT TO HEALTH FOR ALL AGES.

THERE ARE NO DOCTORS SURGERIES TO SUPPORT ANY FURTHER DEVELOPMENT IN THIS AREA, LIKEWISE WITH SCHOOLS ETC. ALSO OUR ROAD STRUCTURE IN & AROUND THIS AREA JUST CAN NOT FACILITATE ANY MORE CARS. IT'S A PAINFUL DRIVE TRYING TO GET THROUGH WORTHING TOWARDS BRISTOL IN THE MORNINGS, JUST THE SAME GOING WEST.


GORING GAP AREA IS JUST A FANTASTIC PLACE TO WALK EITHER FIRST IT ON THE SEA FRONT OR DOWN THROUGH THE MIDDLE, EITHER SUMMER OR WINTER, RAIN OR SUN.

MY FRIENDS OVER FROM AUSTRALIA THOUGHT IT WOULD BE A GREAT SCHEME TO BUILD OR LOOSE ANY PART OR THE AREA FOR JUST SO MANY REASONS.....
--- SO DO WE ALL.

GORING IS KNOWN FOR ITS 'GORING GAP' AREA, THE VIEW NORTH AND THE OPEN ASPECT IT GIVES TO OUR AREA WHICH IS WHY PEOPLE LIVE AROUND HERE, IF BUILT ON IT WOULD ALL JUST BECOME 'THE WEST WORTHING AREA' WHICH I MUST SAY IS JUST ONE BIG BUILT UP AND HOUSING AREA. A BIT SHABBY IN PARTS ALSO.

(M)

Please continue on separate sheets as necessary

Name:	MARK CAVENET	Signature	
Date:	SUNDAY 12-6-2016		



REFERENCE

Comment number: WIO-M-31

Date received: 14/06/2016

Comment number:

Date received: 14/6/16

Your Town –Your Future

**A new Local Plan for Worthing
Consultation Document May 2016
Comments Form**

Worthing Borough Council has started work on preparing a new Local Plan which will have a big influence on the town in the period up to 2033. The publication of the 'Your Town- Your Future' consultation document provides the first opportunity to comment on relevant issues and options.

This consultation runs from 11th May to 22nd June 2016.

Website: www.adur-worthing.gov.uk/worthing-local-plan

Email: worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	SUZANNE
Last name	JONES
Organisation (where applicable)	N/A
Address line 1	[Redacted]
Address line 2	
Address line 3	
Post Code	
Email address	

You can respond to this consultation online or by email. However, if your preference is to make comments manually this form can be photocopied as many times as necessary.

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Section B - Comments

The consultation document summarises issues and options within thematic sections and goes on to set out some key questions. Whilst comments are invited on all aspects of the emerging Local Plan it would help us if you could clarify which section of the document or which question you are responding to.

QUESTION 32.

I BELIEVE THAT THE GREENFIELD SITES SHOULD BE PROTECTED AND REMAIN AS THEY ARE BECAUSE ANY DEVELOPMENT WOULD DESECRATE THE COASTAL AND IMMEDIATE ENVIRONMENT. ALSO PUTTING A STRAIN ON THE LOCAL SEWAGE AND WATER SUPPLIES AND A STRAIN ON THE LOCAL HEALTH AUTHORITY SUPPLYING THE DOCTORS AND HOSPITAL SERVICES ALREADY UNDER SERIOUS PRESSURE

Please continue on separate sheets as necessary

Name:	MS S.D.A. JONES	Signature	
Date:			

REFERENCE

Comment number: WIO-M-32

Date received: 14/06/2016

Rob Huntley [REDACTED]

17:10 (7
minutes ago)

to me

I attach my response to the Local Plan Consultation Document, on behalf of my client Hargreaves.

In due course I would be grateful if you could let me know the arrangements to be put in place for the subsequent stages in the preparation of the Local Plan.

Rob Huntley BSc DipTP MRTPI



<http://www.rtpiconsultants.com/consultant/main/1294>



Office Use only
Comment number:
Date received:

Your Town - Your Future

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Email: please email this completed form to worthinglocalplan@adur-worthing.gov.uk
Phone: 01903 239999
Address: Planning Policy Team, Worthing Borough Council,
Portland House, 44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	Rob		
Last name	Huntley		
Organisation (where applicable)	RHPC – on behalf of Hargreaves Management Ltd		
Address line 1	2 Fielding Gardens		
Address line 2	Crowthorne		
Address line 3	Berks		
Postcode	RG45 7QW	Telephone	01344 762652
Email address	rob.huntley@talk21.com		

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Section B - Comments

The consultation document summarises issues and options within thematic sections. General comments can be inserted in the box below and comments about specific sections of the Plan can be made in response to some key questions that follow.

Ensuring adequate provision of homes to meet established local requirements is a central tenet of sustainable development. It is essential that "no stone be left unturned" to seek to meet these requirements, as the Housing chapter of the consultation document recognises. There is an acknowledged severe mis-match between the objectively assessed requirement for new homes in Worthing, and projected available future supply. This points to the need actively to promote new sites to bolster housing supply, including land at lying outside the present tightly defined built up area.

The identification, in the May 2016 consultation document, of land at the north end of Beeches Avenue, and at the football club site off Lyons Way as strong candidates to contribute to housing land supply, is wholly appropriate in this context and is supported.

VISION

Q1a - Do you agree with the Vision we are aiming and aspiring to achieve?

The vision should involve placing greater emphasis on the provision of new homes in the Borough than the present wording implies. In this regard, the words "new homes and" should be added in the first sentence of the second paragraph of the VISION wording, so that it reads:

"Limited land resources will have been developed in the most efficient way to maximise the delivery of new homes and the widest range of identified needs, whilst at the same time ensuring that the Borough's intrinsic character and its beach and countryside setting have been protected and enhanced."

Q1b - Does it provide a clear direction for the Worthing Local Plan?

It would, with the addition as set out above

Q1c - Is there anything you think we have missed which you would like to see incorporated in the Vision?

See above

STRATEGIC OBJECTIVES

Q2a - Do you agree with the proposed objectives set out above? If not, what changes would you like to see?

The first bullet point under the COMMUNITY heading should be strengthened by including the following alteration:

- **Deliver a range the maximum number of high quality new homes that best so as to reflect the identified needs within the Borough (in terms of size, type and tenure).**

This alteration would ensure consistency with the Housing chapter of the consultation document.

Q2b - Are the objectives sufficiently distinctive and locally specific?

ECONOMY

Q3a - Do you agree with the key challenges identified for the economy? Are any missing?

Q3b - Should the Local Plan continue to protect key employment areas or should it be more flexible in its approach?

Q3c - In addition to the sites already identified as having the potential to deliver employment land are there any other sites that could accommodate employment growth?

RETAIL AND THE TOWN CENTRE

Q4a - Have all the key challenges for retail areas and the Worthing town centre been identified, if not what has been missed?

Q4b - Are retail centres functioning well - how can they be improved?

Q4c - How could new development in the town centre enhance the town's identity and attract more visitors?

TOURISM

Q5a - Have the key challenges for tourism been addressed?

Q5b - In what ways can the tourism offer be improved?

COMMUNITY AND LEISURE FACILITIES

Q6a - Do you agree with the main challenges identified in planning for the provision of different infrastructure needs? Are any missing?

Q6b - Do you have suggestions for how the Local Plan could resolve these?

Q6c - Are you aware of any particular community and leisure needs?

TRANSPORT

Q7a - Do you agree with the main challenges identified? Are any missing?

Q7b - Do you have any suggestions for how the Local Plan could better promote sustainable transport?

ENVIRONMENT

Q8a - Do you agree with the main environmental challenges identified? Are any missing?

Q8b - Do you have any suggestions for how the Local Plan could reach a balance between competing needs?

Q8c - Are there any circumstances you consider where regardless of mitigation, development would be inappropriate?

Q8d - What value do you place on the borough's green spaces, particularly those around the town?

HOUSING

Q9a - Should housing delivery be given higher priority than other development needs (e.g. employment land, community facilities)?

Yes. Ensuring the availability of adequate quantity and quality of housing to meet local requirements should be regarded as first among the interrelated strands of sustainable development.

Q9b - How should we best address specialist housing needs (e.g. affordable housing, family housing, self-build housing, sheltered & extra care, houses in multiple occupation)?

Q9c - Efficient use of land will help to raise densities and will contribute towards meeting development needs. What potential impacts of this should the Council try to mitigate?

Stressing the need to achieve high quality design would ensure that impacts are appropriately mitigated.

Q9d - Should the Council include a policy that would resist the inappropriate development of residential gardens?

Inappropriate development should of course be resisted, but development of garden land within built up areas is not automatically inappropriate. Indeed, such development can make a positive contribution towards meeting local requirements in sustainable locations and make best use of urban land.

DEVELOPMENT OPTIONS WITHIN THE TOWN

Q10a - Do you agree that the sites listed above provide the most significant redevelopment and regeneration opportunities to deliver housing, employment and leisure uses within the town?

Land at Worthing United FC lies within the defined built up area boundary and so should be regarded as "within the town" for the purposes of the consultation document. The site should be identified as an Area of Change within the schedule of sites listed in this category.

Q10b - Do you have any particular comments on how any of the identified sites should be developed and for what mix of uses?

Q10c - Are there any other potential development sites within the current built up area that should be assessed?

EDGE OF TOWN DEVELOPMENT OPPORTUNITIES

Q11a - Given the housing needs in the Borough do you have any views as to which of these sites should be developed or protected?

Land North of Beeches Avenue (site 1 in the list of edge of town development opportunities), is appropriate for development to contribute to meeting residential development requirements of the Borough. It is not within the National Park and is not subject to flooding or environmental constraints. It does not have a high amenity value, nor does it lie between settlements where potential coalescence could be an issue. The Beeches Avenue site is, as the assessments

undertaken by the Council confirm, the best performing and most appropriate of the sites identified in the "edge of town" list. It should be prioritised for residential development accordingly.

Land at Worthing United FC off Lyons Way (site 2 in the list), should more properly be included in the list of sites within the town (see above). It lies within the built up area, where development would be consistent with existing policy. The land should be identified for development to provide new homes, with the relocation of the football ground to an alternative site within or outside the built up area.

Q11b - If any of these sites (in full or in part) are to be allocated for development do you have any views on how they should be developed?

The Beeches Avenue site is capable, subject to detailed design, of accommodating around 90 dwellings of a range of types, sizes and tenures of housing, including a contribution to meeting affordable housing needs.

The Football Club site is capable, subject to detailed design, of accommodating around 60 dwellings of a range of types, sizes and tenures of housing, including a contribution to meeting affordable housing needs.

Q11c - If any of these sites are not allocated for development do you have any views on how they should be protected, enhanced or used?

Q11d - Land West of Fulbeck Avenue (site 7) and Land north of West Durrington (site 8) are already within the Built Up Area boundary. In light of significant housing needs should the Council take a positive approach and look to bring forward these sites in advance of the adoption of the new Local Plan?

In view of the significant shortfall of housing land supply against requirement in the Borough, suitable sites within the built up area should indeed be prioritised for early development. Their development need not be delayed arbitrarily until after adoption of the local plan. This approach should also apply to the Worthing United FC site, which lies within the built up area.

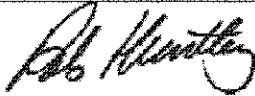
PLANNING POLICIES

Q12a - Do you have any views on how any of the listed policies should be worded?

Q12b - Are there any policies missing from the list?

Q12c - Are all of the listed policies required?

Please continue on separate sheets as necessary

Name:	Rob Huntley	Signature	
Date:	14 June 2016		



REFERENCE

Comment number: WIO-M-33

Date received: 15/06/2016

Office Use only

Comment number:

Date received: 15 JUN 2016

Your Town –Your Future

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Email: worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A – Contact Details

First name	JOHN REGINARO
Last name	PUTTICK
Organisation (where applicable)	N/A
Address line 1	
Address line 2	
Address line 3	
Post Code	
Email address	N/A

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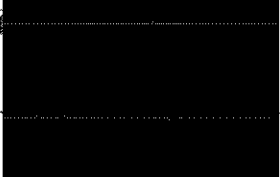
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THE GORING GAP SOUTH SIDE AND CHOTSMORE FARM

1. THE GORING GAP IS UNIQUE IN PROVIDING A DIVISION BETWEEN GORING AND PERRINS WITH UNINTERRUPTED VIEWS FROM COAST TO THE SOUTH DOWNHILL.
2. WE HAVE ALREADY EXPERIENCED INCURSIONS INTO THE GAP BY THE PURCHASE OF THE STRIP OF LAND TO THE SOUTH OF THE GAP FULLY FENCED WITH POTENTIAL GATED ACCESS FOR, AS I UNDERSTAND IT, CARAVANS AND MOTOR HOMES.
3. DESPITE THE NEW SIGNS NOT ALLOWING OVERNIGHT STAYS FOR CARAVANS AND MOTOR HOMES THERE IS A LACK OF DUE DILIGENCE IN ENFORCING IT, ENCOURAGING AN ONGOING PROBLEM.
4. THE RESTRICTED HEIGHT BARRIERS HAVE BEEN DAMAGED AND THERE IS A LACK OF URGENCY IN REPAIRING THESE PARTICULARLY ANSELLEY DRIVE END
5. DURING THE WINTER PERIOD AND MIGRATION TIMES THE SOUTHERN END OF FARMLAND IS A VALUABLE ROOST FOR GULLS, GEESE, WOODS AND WASTAILS PARTICULARLY AT HIGH TIDE, ALSO SKYLARKS USE THE FARMLAND FOR POSSIBLE BREEDING.
6. TO ALLOW BUILDING ON THE SCALE REVISITED IN THE GAP WOULD HAVE A DETRIMENTAL EFFECT ON THE CHARACTER OF THE AREA AND PLACE HUGE PRESSURES ON LOCAL AMENITIES.

Please continue on separate sheets as necessary

Name:	MR. J. R. POTLOCK	Signature:	
Date:	14 th JUNE 2016		



REFERENCE

Comment number: WIO-M-34

Date received: 15/06/2016

Comment number:

Date received: 15 JUN 2

Your Town –Your Future

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Consultation Document May 2016
Comments Form**

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Email: worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	JOHN CHARLES
Last name	STOVELL
Organisation (where applicable)	N/A APPLICABLE
Address line 1	[REDACTED]
Address line 2	
Address line 3	
Post Code	
Email address	-

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THE BORING GAP SOUTH SIDE AND CHATSMORE FARM
 QUESTIONS PAGE 32: Q11 EDGE OF TOWN DEVELOPMENT OPPORTUNITIES

- 1) AM WRITING TO STATE THAT I BELIEVE THAT THE ABOVE GREENFIELD SITES SHOULD BE PROTECTED AND REMAIN AS THEY ARE DUE TO: (1) SEPARATING AND PROTECTING THE INDIVIDUALITY OF TWO COMMUNITIES (BORING AND FERRING) AND THE COUNCIL'S (WORTHING AND ARUN)
- (2) THE GAP OFFERS AN UNINTERRUPTED AND UNIQUE VIEWS FROM THE SEA TO THE SOUTH DOWNS.
- (3) BUILDING WOULD HAVE A SIGNIFICANT AND DETRIMENTAL EFFECT ON THE CHARACTER OF THE LANDSCAPE. EXISTING ROADS ^{IN THE AREA} ARE ALREADY SATURATED WITH TRAFFIC.
- (4) GRADE 1 AGRICULTURAL LAND WILL BE DESTROYED IF DEVELOPED
- (5) FLOOD RISK
- (6) THE GAP IS A HABITAT FOR SEA BIRDS AND WADING BIRDS WHO ARE ROOSTING OR RESTING DURING MIGRATION TIMES.
- (7) RURAL ENVIRONMENT WITH URBAN ACCESS.
- (8) ^{COASTAL} URBAN DEVELOPMENT EXTENDS FROM LITTLEHAMPTON TO BRIGHTON, WITH ONLY ONE PIECE OF COUNTRYSIDE MEETING THE SEA, IE. BORING GAP SOUTH SIDE AND CHATSMORE FARM. IT IS IN EVERYBODY'S INTEREST TO PRESERVE THIS UNIQUE SECTION OF COUNTRYSIDE.
- (9) COULD I ASK HOW MANY HOUSES HAVE BEEN BUILT OR DEVELOPMENT AGREED FOR IN THE LAST THREE/FIVE YEARS, IN WORTHING, AND HOW MANY NEW ROADS, SCHOOLS AND HOSPITALS HAVE BEEN BUILT IN THAT TIME IN WORTHING?

Please continue on separate sheets as necessary

Name:	MR. JOHN CHARLES STOVELL	Signature	
Date:	13 th JUNE 2016		

REFERENCE

Comment number: WIO-M-35

Date received: 15/06/2016



Office Use only

Comment number:

Date received: 15 JUN 2016

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Email: worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	MARILYN ROSE MAY
Last name	PUTTOCK
Organisation (where applicable)	N/A
Address line 1	
Address line 2	
Address line 3	
Post Code	
Email address	N/A

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RESPONSE TO:-

"THE GORING GAP SOUTH SIDE AND CHATSMORE FARM."


I wish to protest most strongly against any interference of the Goring Gap and Chatsmore Farm. To build on this land would totally destroy the open view to the South Downs from the sea. Hence the name "Goring Gap".

It would also destroy a habitat for birds who flock there during the winter months to roost during the high tides.

Also it creates a boundary between Goring and Goring, and provides a wonderful outlook for residents in Sea Lane, which no doubt they would have paid for on moving in!

It would be a travesty to build on an area that has always been an open space for the community to enjoy for years. **ONCE GONE CAN NEVER BE REPLACED!**

Please continue on separate sheets as necessary

Name:	MRS M.R.M. PUTTOCK	Signature	
Date:	14.6.16.		



REFERENCE

Comment number: WIO-M-36

Date received: 16/06/2016

Office Use only

Comment number:

Date received: 6 JUN 2016

Your Town –Your Future

**A new Local Plan for Worthing
Consultation Document May 2016
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6 JUN 2016

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Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	ROSEMARY
Last name	DAWES
Organisation (where applicable)	
Address line 1	
Address line 2	
Address line 3	
Post Code	
Email address	

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THE GORING GAP SOUTHSIDE AND CHATSHORE FARM ~~SHOULD BE~~
~~PROTECTED~~ A.H. EDGE OF TOWN DEVELOPMENT.

I BELIEVE THE GORING GAP AND CHATSHORE FARM SHOULD BE
PROTECTED.

BUILDING ON THIS LAND WOULD HAVE A DETRIMENTAL EFFECT ON
THE NATURAL LANDSCAPE, WILDLIFE HABITAT AND AGRICULTURAL
LAND. THERE WOULD BE RISKS OF FLOODING, EXTRA POLLUTION
AND TRAFFIC CONGESTION ON TO MAJOR ROADS.

THE GAP IS A PICTURESQUE DIVISION BETWEEN GORING AND FERRING
ENJOINED BY LOCALS AND VISITORS TO THE AREA. LETS NOT TURN
ALL THESE PLACES INTO CONCRETE JUNGLES.

Please continue on separate sheets as necessary

Name:	ROSEMARY DAVIES	Signature	
Date:	13.6.16.		



REFERENCE

Comment number: WIO-M-37

Date received: 16/06/2016

Comment number:

Date received:

Your Town –Your Future

16 JUN 2016

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Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	ALAN
Last name	D A W E S
Organisation (where applicable)	
Address line 1	
Address line 2	
Address line 3	
Post Code	
Email address	

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THE LEAVING GAP SOUTH SIDE AND CHATSMORE FARM
ON ONE OF YOUR DEVELOPMENT PROPOSALS

I BELIEVE THAT THE LEAVING GAP AND CHATSMORE
FARM SHOULD BE PROTECTED.

BUILDING ON THE LAND WOULD CAUSE A SIGNIFICANT
AND DETERMINING EFFECT ON THE CHARACTER OF
THE EXISTING JOINTLY OWNED RISH, DETENT EDWARDS
HAGGON FOR MOUNTAIN SEA BLOSS AND IMPACT
THE UNINTERRUPTED VIEW FROM THE SEASIDE
TO THE SOUTH DOON.

THE LEAVING GAP AND CHATSMORE FARM ARE A RURAL
ENVIRONMENT WITH EAST URBAN ACCESS AND
REQUIRE THE SPECIAL PROTECTION OF
THE COMMUNITIES OF RISH AND CHATSMORE.

Please continue on separate sheets as necessary

Name:	ALAN JAMES	Signature	
Date:	12.6.15.		

REFERENCE

Comment number: WIO-M-38

Date received: 16/06/2016

16 JUN 2016

12.6.16

Dear Sir,


Re Sperry Gap - North & South Side

We are appreciative of the fact that the Council wish to protect the above Greenfield sites and would like to add our names in support.

While we understand the need for housing, medical care & schools, this area is precious to locals & visitors. It provides uninterrupted views of the Downs & is important to sea and wading birds, but also a breathing space for us all.

We sincerely hope this area can be kept unspoilt for everyone to enjoy.

Yours sincerely


Norma White

L.A. White^s
N. White

REFERENCE

Comment number: WIO-M-39

Date received: 16/06/2016



Office Use only

Comment number:

Date received:

Your Town –Your Future

A new Local Plan for Worthing Consultation Document May 2016 Comments Form

Worthing Borough Council has started work on preparing a new Local Plan which will have a big influence on the town in the period up to 2033. The publication of the 'Your Town- Your Future' consultation document provides the first opportunity to comment on relevant issues and options.

This consultation runs from 11th May to 22nd June 2016.

Website: www.adur-worthing.gov.uk/worthing-local-plan

Email: worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name:	JOHN
Last name:	COCOZZA
Organisation (where applicable)	N/A
Address line 1:	
Address line 2:	
Address line 3:	
Post Code:	
Email address:	

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Section B - Comments

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Q 11

I consider it would be an absolute tragedy to spoil the lovely view from sea to South Downs by the proposed development of the Goring Gap! Agricultural land would be destroyed + the habitat lost to wildlife.

I also feel it is of the utmost importance that Chelmore Farm is similarly protected.

Goring and Ferring are 2 separate communities with 2 different Councils of Arun + Worthing + should, in my opinion, be kept as such.

Developing these areas would inevitably make them prone to flooding. I sincerely hope these developments will NOT go ahead!

Please continue on separate sheets as necessary

Name:	JOHN COCOZZA	Signature	
Date:	13 JUNE 2016		

REFERENCE

Comment number: WIO-M-40

Date received: 16/06/2016



Office Use only

Comment number:

Date received: 16 JUN 2016

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44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	GILLIAN
Last name	LANEY
Organisation (where applicable)	—
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Address line 2	
Address line 3	
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Email address	—

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GORING / FERRING GAP - SOUTH SIDE (P32)


ANY DEVELOPMENT OF ANY KIND BUILT ON GORING / FERRING GAP WOULD BE DETRIMENTAL TO THE ENVIRONMENT.

IT IS ONE OF THE VERY FEW, IF NOT THE ONLY, OPEN SPACE GIVING ACCESS TO THE SEA AND AN UNINTERRUPTED VIEW OF THE DOWNS. IT WOULD ALSO DESTROY MANY ACRES OF AGRICULTURAL LAND.

THESE OPEN SPACES ARE NECESSARY FOR LOCAL PEOPLE AND VISITORS - TO "GET AWAY FROM IT ALL" AND ENJOY SEA AND COUNTRY.

ALSO, WITH THE RISK OF FLOODING ON SOME OF THE LAND, WOULD IT NOT BE BETTER TO LEAVE IT AS AGRICULTURAL?

Please continue on separate sheets as necessary

Name:	B. LANEY	Signature	
Date:	13 JUNE 2016		

REFERENCE

Comment number: WIO-M-41

Date received: 16/06/2016



Office Use only	
Comment number:	
Date received:	16 JUN 2016

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Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details	
First name	Gillian ANN
Last name	MELDRS
Organisation (where applicable)	
Address line 1	
Address line 2	
Address line 3	
Post Code	
Email address	

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I am very aganost any building in the Spring Gap both North and South. We must keep this last open space. I have lived in the area since 1938 and it has grown so much over the years - when I was a child I could walk across fields to the sea. Now for my grandchildren and Gr-grandchildren they will never know the joy of playing in fields and walking through the countryside to the sea. All they will know is roads and concrete and buildings! Our well being depends on being able to breathe fresh air and seeing nature in all its beauty - Not manmade buildings.

Please continue on separate sheets as necessary

Name:	Mrs G. MELLORS	Signature	
Date:	15-6-16		



REFERENCE
Comment number: WIO-M-42
Date received: 16/06/2016

Office Use only
Comment number:
Date received: 16 JUN

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Consultation Document May 2016
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Email: worthinglocalplan@adur-worthing.gov.uk
Phone: 01903 239999
Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details	
First name	DEREK
Last name	GUILF
Organisation (where applicable)	
Address line 1	
Address line 2	
Address line 3	
Post Code	
Email address	

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THE GOING GAP SOUTH SIDE, AND KIRKSTONE FARM


PAGES 28-32.

QUESTIONS PAGE 32.

I am extremely concerned about the future of the two areas referred to above. They are of special interest to us as I regularly use them for walking and watching 'wild life'. There are no doubt many reasons for retaining these 'gaps' but listed below are the ones I wish to put forward.

- Separating & protecting the individuality of two communities (Loring/Ferry)
- The gaps offer uninterrupted and unique views from the sea to the South Downs.
- Building would have a significant and detrimental effect on the character of the landscape.
- An increased risk of flooding in the area.
- Agricultural land will be lost forever.
- The gaps are a habitat for sea birds / wading birds who roost / nest during migration times.

Please continue on separate sheets as necessary

Name:	DEREK GULLO	Signature	
Date:	14 th JUNE 2016		

REFERENCE

Comment number: WIO-M-43

Date received: 16/06/2016

Richardson, Matt <matt.richardson@persimmonhomes.com> 12:37 (3 hours ago)

to me

Dear Sirs

Please find attached our completed form and covering letter, which answers the questions set out as part of the Your Town – Your Future consultation.

I trust that everything is in order and that the above is helpful, however, should you require anything further then please do not hesitate to contact me.

Kind regards

Matt

Matt Richardson
Strategic Land Planning Manager

Persimmon Homes Thames Valley
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matt.richardson@persimmonhomes.com
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Planning Policy Team
Worthing Borough Council
Portland House
44 Richmond Road
Worthing
BN11 1HS

16th June 2016

Dear Sirs

Ref: A new Local Plan for Worthing Consultation Document May 2016

This letter constitutes Persimmon Homes Limited's formal response to the above consultation. As part of the Persimmon Group, the company represents one of the largest house builders in the UK and is a significant stakeholder in the Borough with a vested interest in the long-term future of Worthing Borough.

We have made a number of comments, but reserve the right to make further comments as appropriate. We are keen to work with the council moving forward.

The comments within this letter relate to our interests at Chatsmore Farm, Goring (site 5) and Manor Farm, Ferring (site 4).

Foreword / Introduction

For the reasons given in the Your Town – Your Future document the Council is right to review the Worthing Local Plan. However the urgency to secure housing delivery is greater than the lengthy Worthing Local Plan review process would permit. Housing supply policies in the present Core Strategy are out of date in the absence of a five year supply of deliverable housing sites (NPPF para 49) following work on Objectively Assessed Housing Need (OAN).

As the Introduction notes, "planning too little development is not an option either, as the plan needs to support growth".

Key Challenges

Persimmon Homes (Thames Valley) (PHTV) would agree with the key challenges and would particularly highlight:



The aspiration to deliver growth within a very constrained Borough; and the wish to ensure that an appropriate mix of development comes forward to respond to needs – for example provision for family housing and not over reliance upon denser urban development. This is a point confirmed within the Worthing Housing Study (June 2015), which stated that “the analysis of an appropriate mix of dwellings should also inform the ‘portfolio’ of sites which are considered through the Local Plan process, including: Site Allocations, Neighbourhood Plans and other planning documents”. This follows on the back of the same report stating that “the provision of market housing should be more explicitly focused on delivering smaller family housing for younger households”.

Indeed we support the idea of the plan making the difficult decisions and looking to continue to meet the needs of residents and with this in mind the town is becoming very popular with young people and families and these groups need family accommodation, and this is best provided within the edge of town opportunity areas and particularly sites 4 and 5, which are best able to meet this need, whilst providing other specific community benefits and environmental benefits, which are identified within the consultation document. It is important to note that flats comprise slightly under 36% of Worthing dwelling stock, which is a considerably higher proportion than is seen across Coastal West Sussex, and this balance within the housing stock needs to change if the council is to face head on and indeed meet the key challenges it faces.

“Worthing has a greater proportion of single person households of working age – i.e. aged 16 to 64 – than seen in Coastal West Sussex, regionally, or nationally. This is symptomatic of more urban areas which generally have a higher proportion of flats and smaller properties and often support a greater proportion of non-standard household types”. (Worthing Housing Study (June 2015).

Vision & Objectives (question 1 & 2)

The Vision in the consultation document is an appropriate one and PHTV are keen to help the Council support the vision. The Borough is fortunate in its location and setting. It has inherent character and high quality new development in suitable locations will only add to the physical attributes, economy and community well-being. The Strategic Objectives under the headings of Community, Economy and Environment are entirely reasonable.

We wonder however, if as part of the vision the need to continue to support and attract young people and families needs to be identified and specifically mentioned.



Key Issues

Within the Key Issue Section a number of factors need to be underlined:

Economy (question 3)

It is important to note that the council recognises that it is continuing to face pressure from other uses with regards to the loss of employment land, whilst confirming that it is a net exporter of labour. Demand for office space is expected to grow and there is a severe shortage of and strong local demand for industrial units. It is therefore imperative that the council as identified under Q3 b, seeks to protect at all cost all existing employment areas and should not be flexible. Once these areas are redeveloped, they are lost and are unlikely to be replaced.

Environment (question 8)

The published Landscape and Ecology Study is just one background document which is topic specific and needs to be seen in the context of other elements of the planning balance. This would include the economy and the need to provide as many decent homes to meet OAN as is reasonable. This should be on suitable sites which are limited in their constraints by flood risk, settlement pattern, ecology or a range of other environmental or technical factors.

The consultation document clearly identifies the challenges that the council are under, however, within the edge of town development opportunities that have been identified, it must be recognised that in many places the suggestion that settlements enjoy individual identities is a fallacy. Because of the way settlements have developed historically, the separation between settlements in the west and Goring for example have been massively compromised, particularly along the route of the railway line and Goring Way. Nonetheless, 'respecting the individual identities of settlements' could also be identified as a key challenge.

Within question 8b the council has asked for suggestions as to how the Local Plan could reach a balance between competing needs? These different needs are substantial and not necessarily mutually exclusive. There are areas within the different edge of town sites that could be developed without damaging this balance. This point has been made within the published Landscape and Ecology Study, and whilst we do not agree with the extent of the development potential as it relates to sites 4 and 5, it is clear that a level of development could be delivered, which provides for much needed family accommodation, whilst also providing a network of green infrastructure and opening up what is otherwise private land, with no access to the public.

Q8d asks for comments on the value to be placed on the borough's green spaces, particularly those around the town? Clarification is needed as to what constitutes the borough's green spaces. We assume this relates to the areas



of public open space within the Town Centre and if so the value to be placed on them should be high. The borough is heavily constrained as has been identified before and therefore where there is an ability improve these or indeed add to these this should be taken (see comments above under question 8b).

Housing

The consultation documents analysis of why Worthing needs more homes is a fair one and it is helpful to have the OAN set out and a context laid. The benefits to be brought by more homes are also reasonably portrayed. The issues and importance expressed around OAN underlines the task ahead for the Council; some timely and potentially challenging decisions will need to be made. Failing to provide as many suitable homes as reasonably possible is not a matter for procrastination. As it is a fundamental need for all people to have a decent home the provision of these should be a development priority in answer to Q9(a).

For those reasons identified by the council we also believe the council should resist the redevelopment of gardens.

Development Options within the Town / Areas of Change

Persimmon Homes (Thames Valley) would make no comment on site identification. It would however point to the proven and recognised difficulties of delivering homes on some of these long identified areas. A number of these sites, however, laudable have been identified for a number of years and have still not been delivered for whatever reason. Therefore there must be no over-reliance on housing supply from urban sites and that when or if they do eventually deliver this will generally provide flatted rather than family accommodation.

Edge of Town Development Opportunities

As officers are aware, Persimmon Homes have a number of interests within Worthing, including as part of the land at North of West Durrington (site 8); Chatsmore Farm (site 5); Goring (site 4) and Upper Brighton Road (site 3). The section detailing the Edge of Town opportunities as part of the consultation document fairly points out that the Landscape Study Findings "will need to be balanced with all other evidence to determine the suitability of sites for development". Persimmon Homes (Thames Valley) would support that stance.

In terms of Chatsmore Farm (Site 5), PHTV will be supplying evidence which will show that the Study's findings on the potential for the site to accommodate any meaningful level of development are resolvable through suitable mitigation and sympathetic layout. The HDA assessment of Site 5 identifies the land as being surrounded by existing development to the south, east and west, including 3 storey buildings to the north east and flatted development to the south east. The A259 forms the sites northern boundary,



which effectively separates the site from the rising ground of the SDNP to the north. Ferring Rife follows an east-west course through the centre of the site.

The site is divided into two zones which are assessed as having different sensitivities. Zone A occupies approximately $\frac{3}{4}$ of the site and is described as being open to views from Highdown Hill and elsewhere within the SDNP to the north. The zone is correctly described as being seen within the context of existing settlement on three sides and is described as forming a gap in the view of development along the coastal plain. This is in part correct but is better described as an indentation as development continues to the south of the site. The zone is described as creating effective separation between Goring and Ferring when travelling along the A259 road. The visual sensitivity of the Zone A is judged to be Major.

Zone B occupies the south west corner of the site and is similarly described as being visible from high ground within the National Park although it is acknowledged that it forms a less prominent part of the visual separation between Goring and Ferring than Zone A. The visual sensitivity of Zone B is judged to be Moderate.

The green infrastructure objectives for the site include, amongst other things, maintaining the separation between Goring-by-Sea and Ferring; enhance riparian vegetation along Ferring Rife; strengthening boundary vegetation, in particular along the A259 but without damaging the open views; potential to plant new woodland tree belt to form robust vegetated edge to the settlement; and replace or provide new public footpath to edge of settlement to maintain views to the National Park, if Zone B of the site is developed.

It is not the intention of this response to comment on the judgements that are made on the sensitivity of the zones as these are a matter of professional judgement and may differ depending on the individual carrying out the assessment.

The HDA report recognises that part of the site (Zone B) could be suitable for development. However, the area that has been identified adopts an arbitrary boundary which bears no relationship to any vegetated, topographic or other landscape feature, nor does it relate to the historic or contemporary field pattern within the area. To adopt such an arbitrary development boundary would appear incongruous in both landscape and townscape terms. A more rational and appropriate development area would be to include all of the land to the south of Ferring Rife. This would have the advantage of identifying a land parcel which was contained by a natural and clearly identifiable landscape feature rather than one which was unrelated to any landscape feature. The planting alongside the Rife could be strengthened to reinforce this as a natural limit to development and this approach would be entirely consistent with the green infrastructure objectives of enhancing riparian vegetation along Ferring Rife.



By limiting development to the south of the Rife the perception of a break between Goring-by-Sea and Ferring would still be maintained for those using the A259. Similarly, by keeping development to the south of the Rife, the setting of the SDNP would be respected.

In terms of Manor Farm, Goring (Site 4), PHTV will be supplying evidence which will show that the Study's conclusions on the development potential of the land are resolvable through suitable mitigation and sympathetic layout.

Site 4 consists of predominantly flat arable fields and some smaller areas of rough grassland. There is limited tree cover internally, but the zone is bordered by a significant belt of woodland plantation to the south-east, a small woodland block and length of hedgerow along the eastern boundary, and a distinctive avenue of evergreen Oak trees along Ilex Way adjacent to the northern site boundary which fall within a Conservation Area. Amberley Drive forms a loop road in the southern half of the site. The northeastern part of the site consists of two fields; the eastern one is used as a playing field; and the western field is arable. The boundaries of these fields are generally well vegetated.

From within the site there are views towards the coastline to the south and the South Downs National Park, including Highdown Hill, to the north. Conversely there are views from these areas to the site. From the southern part of the site the Oak avenue along Ilex Way obscures much of the existing settlement to the north, while 'The Plantation' screens development to the east. Views of Ferring to the west are more open.

The site currently provides a perceived break between Ferring and Goring although there is a continuous band of development to the north of the site which links the two settlements.

The HDA report divides the site into two distinct parcels with the enclosed fields in the north eastern part of the site identified as Zone B and the balance of the land Zone A. The overall sensitivity for Zone A is Major and that for Zone B Substantial.

It is apparent from the HDA report that a distinction can be drawn between the open, low lying, arable land that forms the greater part of the site and the more enclosed fields to the north east. In terms of landscape effects and impact on settlement form, it is considered that the north eastern part of the site has the ability to accommodate development without having a material impact on the sense of separation between Goring and Ferring. This is because the area is well related to the existing settlement edge; it benefits from containment from existing vegetation; and lies within an area that already contains suburban influences, such as the playing fields. Similarly development in this location would not significantly impact on views to or from Highdown Hill within the SDNP.



Q11a - Given the housing needs in the Borough do you have any views as to which of these sites should be developed or protected?

Please see the comments above. Specific comments will be made by others with regards to North of West Durrington (site 8) and Upper Brighton Road (site 3), however, we believe for the reasons previously made both of these sites should be developed.

Similarly with regards to Chatsmore Farm (site 5) and Goring (site 4), we believe for those reasons identified above both of these sites should also be brought forward to help the council meet its development needs in a sympathetic and sustainable way.

Q11b - If any of these sites (in full or in part) are to be allocated for development do you have any views on how they should be developed?

Please see the comments above. It is clear that both sites (4 and 5) could be developed in ways which would continue to respect and be sympathetic to the wider environment.

Q11d – asks whether land already within the Built Up Area boundary, taking into account the significant housing needs should be taken forward positively and brought in advance of the adoption of the new Local Plan? The answer is yes, the Council should take a positive approach to bringing forward land at West Durrington in advance of adoption of the new WLP to ensure that the right types of housing are provided in a positive and pro-active manner.

I trust that everything is in order and that the above comments are helpful, however, should you require any further help then please do not hesitate to contact me.

Kind regards



Matt Richardson
For and on behalf of Persimmon Homes (Thames Valley)

Email: matt.richardson@persimmonhomes.com



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Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council,
Portland House, 44 Richmond Road, Worthing, BN11 1HS

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Section B - Comments

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Please see the attached covering letter.

VISION

Q1a - Do you agree with the Vision we are aiming and aspiring to achieve?

Yes

Q1b - Does it provide a clear direction for the Worthing Local Plan?

Yes

Q1c - Is there anything you think we have missed which you would like to see incorporated in the Vision?

The need to continue to support and attract young people and families should be identified.

STRATEGIC OBJECTIVES

Q2a - Do you agree with the proposed objectives set out above? If not, what changes would you like to see?

Q2b - Are the objectives sufficiently distinctive and locally specific?

ECONOMY

Q3a - Do you agree with the key challenges identified for the economy? Are any missing?

Yes

Q3b - Should the Local Plan continue to protect key employment areas or should it be more flexible in its approach?

Yes – see attached covering letter.

Q3c - In addition to the sites already identified as having the potential to deliver employment land are there any other sites that could accommodate employment growth?

RETAIL AND THE TOWN CENTRE

Q4a - Have all the key challenges for retail areas and the Worthing town centre been identified, if not what has been missed?

Q4b - Are retail centres functioning well - how can they be improved?

Q4c - How could new development in the town centre enhance the town's identity and attract more visitors?

TOURISM

Q5a - Have the key challenges for tourism been addressed?

Q5b - In what ways can the tourism offer be improved?

COMMUNITY AND LEISURE FACILITIES

Q6a - Do you agree with the main challenges identified in planning for the provision of different infrastructure needs? Are any missing?

Q6b - Do you have suggestions for how the Local Plan could resolve these?

Q6c - Are you aware of any particular community and leisure needs?

TRANSPORT

Q7a - Do you agree with the main challenges identified? Are any missing?

Q7b - Do you have any suggestions for how the Local Plan could better promote sustainable transport?

ENVIRONMENT

Q8a - Do you agree with the main environmental challenges identified? Are any missing?

Yes - see attached covering letter

Q8b - Do you have any suggestions for how the Local Plan could reach a balance between competing needs?

Yes - see attached covering letter

Q8c - Are there any circumstances you consider where regardless of mitigation, development would be inappropriate?

Q8d - What value do you place on the borough's green spaces, particularly those around the town?
See attached covering letter

HOUSING

Q9a - Should housing delivery be given higher priority than other development needs (e.g. employment land, community facilities)?
Yes – see covering letter
Q9b - How should we best address specialist housing needs (e.g. affordable housing; family housing; self-build housing; sheltered & extra care; houses in multiple occupation)?
See covering letter
Q9c - Efficient use of land will help to raise densities and will contribute towards meeting development needs. What potential impacts of this should the Council try to mitigate?
Q9d - Should the Council include a policy that would resist the inappropriate development of residential gardens?
Yes – see covering letter

DEVELOPMENT OPTIONS WITHIN THE TOWN
--

Q10a - Do you agree that the sites listed above provide the most significant redevelopment and regeneration opportunities to deliver housing, employment and leisure uses within the town?
See attached covering letter
Q10b - Do you have any particular comments on how any of the identified sites should be developed and for what mix of uses?
See attached covering letter
Q10c - Are there any other potential development sites within the current built up area that should be assessed?
See attached covering letter

EDGE OF TOWN DEVELOPMENT OPPORTUNITIES

Q11a - Given the housing needs in the Borough do you have any views as to which of these sites should be developed or protected?
Yes – see attached covering letter
Q11b - If any of these sites (in full or in part) are to be allocated for development do you have any views on how they should be developed?
Yes – see attached covering letter
Q11c - If any of these sites are not allocated for development do you have any views on how they should be protected, enhanced or used?
Yes – see attached covering letter
Q11d - Land West of Fulbeck Avenue (site 7) and Land north of West Durrington (site 8) are already within the Built Up Area boundary. In light of significant housing needs should the Council take a positive approach and look to bring forward these sites in advance of the adoption of the new Local Plan?
Yes – see attached covering letter

PLANNING POLICIES

Q12a - Do you have any views on how any of the listed policies should be worded?
--

Q12b - Are there any policies missing from the list?
Q12c - Are all of the listed policies required?

Please continue on separate sheets as necessary

Name:	Matt Richardson	Signature	<i>M. Richardson</i>
Date:	16 th June 2016		

REFERENCE

Comment number: WIO-M-44

Date received: 16/06/2016

Susan Haite [REDACTED]

14:05 (2 hours ago)

to me

form attached thank you.
Attachments area



Office Use only

Comment number:

Date received:

Your Town - Your Future
A new Local Plan for Worthing
Consultation Document May 2016
Comments Form

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Website: www.adur-worthing.gov.uk/worthing-local-plan

Email: please email this completed form to worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council,
Portland House, 44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	Susan
Last name	Haite
Organisation (where applicable)	
Address line 1	[REDACTED]
Address line 2	[REDACTED]

Address line 3			
Postcode	BN12 4TQ	Telephone	01903 504427
Email address			

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Section B - Comments

The consultation document summarises issues and options within thematic sections. General comments can be inserted in the box below and comments about specific sections of the Plan can be made in response to some key questions that follow.

Please note I have responded only to Questions 1,8,9, and 11. Whilst I feel strongly that Worthing should not be further developed I don't feel I have the information or knowledge to address the other questions.

VISION
Q1a - Do you agree with the Vision we are aiming and aspiring to achieve?
yes
Q1b - Does it provide a clear direction for the Worthing Local Plan?
yes
Q1c - Is there anything you think we have missed which you would like to see incorporated in the Vision?
I am concerned about over developing

STRATEGIC OBJECTIVES

Q2a - Do you agree with the proposed objectives set out above? If not, what changes would you like to see?

Q2b - Are the objectives sufficiently distinctive and locally specific?

ECONOMY

Q3a - Do you agree with the key challenges identified for the economy? Are any missing?

Q3b - Should the Local Plan continue to protect key employment areas or should it be more flexible in its approach?

Q3c - In addition to the sites already identified as having the potential to deliver employment land are there any other sites that could accommodate employment growth?

RETAIL AND THE TOWN CENTRE

Q4a - Have all the key challenges for retail areas and the Worthing town centre been identified, if not what has been missed?

Q4b - Are retail centres functioning well - how can they be improved?

Q4c - How could new development in the town centre enhance the town's identity and attract more visitors?

TOURISM

Q5a - Have the key challenges for tourism been addressed?

Q5b - In what ways can the tourism offer be improved?

COMMUNITY AND LEISURE FACILITIES

Q6a - Do you agree with the main challenges identified in planning for the provision of different infrastructure needs? Are any missing?

Q6b - Do you have suggestions for how the Local Plan could resolve these?

Q6c - Are you aware of any particular community and leisure needs?

TRANSPORT
Q7a - Do you agree with the main challenges identified? Are any missing?
Q7b - Do you have any suggestions for how the Local Plan could better promote sustainable transport?

ENVIRONMENT
Q8a - Do you agree with the main environmental challenges identified? Are any missing?
Q8b - Do you have any suggestions for how the Local Plan could reach a balance between competing needs?
Q8c - Are there any circumstances you consider where regardless of mitigation, development would be inappropriate?
Q8d - What value do you place on the borough's green spaces, particularly those around the town?
Huge value. My mum is one of many elderly and immobile worthing residents. A walk along the prom is fraught with danger for anyone with mobility or balance problems from running children scooters dogs etc and the green spaces provide a flat and peaceful area for the elderly particularly but also for anyone without their own garden.

HOUSING
Q9a - Should housing delivery be given higher priority than other development needs (e.g. employment land, community facilities)?
No – the population of Worthing already seems to be at breaking point, I think more community facilities, especially schools and car parking would be appropriate. Goring residents were recently successful in having the car park behind the shops to the north of the Goring shops resurfaced. Councillors will know how useful this has been, the car park is often virtually full.
Q9b - How should we best address specialist housing needs (e.g. affordable housing; family housing; self-build housing; sheltered & extra care; houses in multiple occupation)?
Some old properties in Worthing have been sensitively converted flats and sit well within the existing town
Q9c- Efficient use of land will help to raise densities and will contribute towards meeting development needs. What potential impacts of this should the Council try to mitigate?
Q9d - Should the Council include a policy that would resist the inappropriate development of residential gardens?
If flats are built it is "nice" to have a small communal garden. If the plan is to develop existing communal garden areas and parks I think that should be strongly resisted.

DEVELOPMENT OPTIONS WITHIN THE TOWN
Q10a - Do you agree that the sites listed above provide the most significant redevelopment and regeneration opportunities to deliver housing, employment and leisure uses within the town?
Q10b - Do you have any particular comments on how any of the identified sites should be developed and for what mix of uses?

REFERENCE

Comment number: WIO-M-45

Date received: 16/06/2016

nigel.abbott <nigel.abbott@wyg.com>

16:15 (26
minutes ago)

to me

Dear Sirs,

Please find attached the completed consultation form on behalf of our client, Clement Somerset in relation to the above. Also attached is a plan showing the location of an additional site our client wishes to be allocated for residential development which is referred to in the representations.

Can you please kindly acknowledge receipt of these representations.

Regards

Nigel

Nigel Abbott
Director - Planning

WYG

100 St John Street, London, EC1M 4EH

Tel: +44 207 250 7511

Fax: +44 207 250 7501

Mob: +44 772 524 5965

www.wyg.com

Q10c - Are there any other potential development sites within the current built up area that should be assessed?

EDGE OF TOWN DEVELOPMENT OPPORTUNITIES

Q11a - Given the housing needs in the Borough do you have any views as to which of these sites should be developed or protected?
Greenfield sites should be protected – I always understood this was the government's view and feel strongly this should be upheld.
Q11b - If any of these sites (in full or in part) are to be allocated for development do you have any views on how they should be developed?
I hope the council will bear in mind the need for improved roads throughout west sussex, also our doctor surgeries and schools are already crowded.
Q11c - If any of these sites are not allocated for development do you have any views on how they should be protected, enhanced or used?
"Goring Gap" offers unique views from sea to downs and provides a natural boundary between Goring and Ferring. It is a haven for migrating birds and I would like to see this designated as a preservation area for all these reasons.
Q11d - Land West of Fulbeck Avenue (site 7) and Land north of West Durrington (site 8) are already within the Built Up Area boundary. In light of significant housing needs should the Council take a positive approach and look to bring forward these sites in advance of the adoption of the new Local Plan?
I believe developers must pay into council funds to provide or improve some local amenities but feel the council funds should be available to repair <i>existing</i> roads rather than the new roads etc that will be required to support new housing.

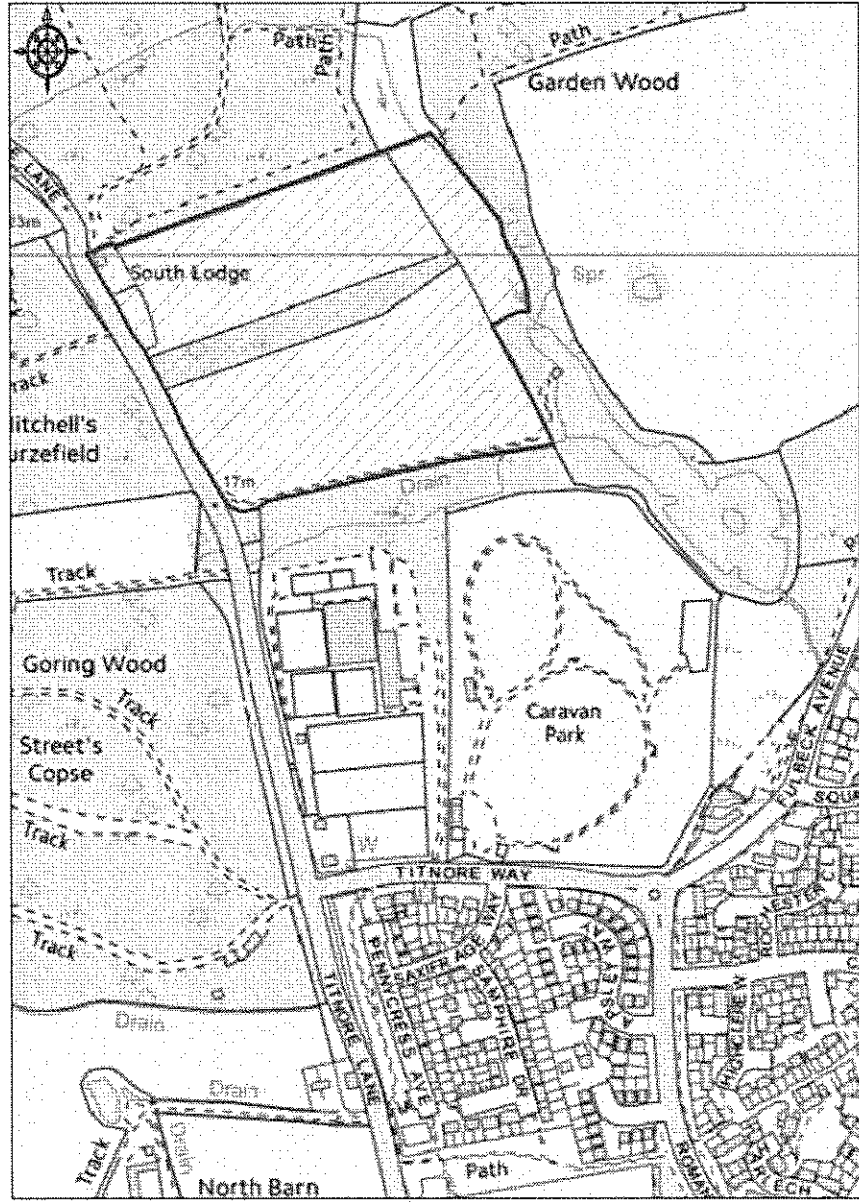
PLANNING POLICIES

Q12a - Do you have any views on how any of the listed policies should be worded?
Q12b - Are there any policies missing from the list?
Q12c - Are all of the listed policies required?

Please continue on separate sheets as necessary

Name:		Signature	
Date:			

Land at Titnore Lane- Site requested to be allocated for residential development.





Office Use only
Comment number:
Date received:

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Email: please email this completed form to worthinglocalplan@adur-worthing.gov.uk
Phone: 01903 239999
Address: Planning Policy Team, Worthing Borough Council,
Portland House, 44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	Nigel		
Last name	Abbott		
Organisation <i>(where applicable)</i>	WYG Group		
Address line 1	100 St John Street		
Address line 2	London		
Address line 3			
Postcode	EC1M 4EH	Telephone	02072507511
Email address	nigel.abbott@wyg.com		

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Section B - Comments

The consultation document summarises issues and options within thematic sections. General comments can be inserted in the box below and comments about specific sections of the Plan can be made in response to some key questions that follow.

The two fields east of Titnore Lane form part of the West Durrington Strategic Allocation as per the adopted Worthing Core Strategy (2011) and should be carried forward into the new Local Plan with the same designation. The two fields are located within the defined development boundary for West Durrington and the land owner who is our client considers that the fields should be retained as an allocation for residential development. Their location is indicated on the attached plan.

The two fields, which are 6.9ha in area, are well enclosed by existing woodland to the north and west which provides a clear boundary for development. Our client recognises that the strip of woodland separating the two fields is an important visual barrier with ecological and biodiversity value which should be retained, managed and enhanced as part of development of the two fields. Likewise, the area of woodland to the south of the southern field which separates the site from the caravan and sports centre which is designated as a Site of Nature Conservation Importance should also be protected as far as possible. However, we fully acknowledge that considerable further work and investment needs to be undertaken to establish key design and access routes into the site. We can confirm that this work will be undertaken in due course to further enhance the support and continuing allocation of the site for development.

The land owner requests the inclusion of South Lodge and its curtilage within the proposed allocation which is also within his ownership and control. This is considered a logical inclusion as it will enable this parcel of land up until the boundary of Titnore Lane to be included as part of the allocation.

Whilst it is considered that the preferred main road access into the site should be from Titnore Lane, to ensure the site is appropriately connected to existing and proposed communities in West Durrington a link through from the caravan park proposed to be allocated for development for pedestrians and cyclists, into the southern field will need to be created. Careful consideration will be given to selecting the most appropriate alignment through the existing part of the Sites of Nature Conservation Importance (SNCI).

VISION

Q1a - Do you agree with the Vision we are aiming and aspiring to achieve?

Yes

Q1b - Does it provide a clear direction for the Worthing Local Plan?

Yes

Q1c - Is there anything you think we have missed which you would like to see incorporated in the Vision?

No

STRATEGIC OBJECTIVES

Q2a - Do you agree with the proposed objectives set out above? If not, what changes would you like to see?

Yes

Q2b - Are the objectives sufficiently distinctive and locally specific?

Yes

ECONOMY
Q3a - Do you agree with the key challenges identified for the economy? Are any missing?
No view
Q3b - Should the Local Plan continue to protect key employment areas or should it be more flexible in its approach?
No view
Q3c - In addition to the sites already identified as having the potential to deliver employment land are there any other sites that could accommodate employment growth?
No view

RETAIL AND THE TOWN CENTRE
Q4a - Have all the key challenges for retail areas and the Worthing town centre been identified, if not what has been missed?
No view
Q4b - Are retail centres functioning well - how can they be improved?
No view
Q4c - How could new development in the town centre enhance the town's identity and attract more visitors?
No view

TOURISM
Q5a - Have the key challenges for tourism been addressed?
Yes
Q5b - In what ways can the tourism offer be improved?
It is noted that the caravan site is proposed to be allocated for housing. Our client would be agreeable to a discussion regarding the caravan club relocating to land within his ownership if this was appropriate.

COMMUNITY AND LEISURE FACILITIES
Q6a - Do you agree with the main challenges identified in planning for the provision of different infrastructure needs? Are any missing?
No view
Q6b - Do you have suggestions for how the Local Plan could resolve these?
No view
Q6c - Are you aware of any particular community and leisure needs?
No view

TRANSPORT
Q7a - Do you agree with the main challenges identified? Are any missing?
No view
Q7b - Do you have any suggestions for how the Local Plan could better promote sustainable transport?

No view

ENVIRONMENT

Q8a - Do you agree with the main environmental challenges identified? Are any missing?

Yes, and No.

Q8b - Do you have any suggestions for how the Local Plan could reach a balance between competing needs?

Allocation of land for new development presents opportunities to provide resources to maintain and enhance existing environmental features and provide suitable mitigation measures.

Q8c - Are there any circumstances you consider where regardless of mitigation, development would be inappropriate?

No

Q8d - What value do you place on the borough's green spaces, particularly those around the town?

Where they perform an important role for the wider public, they should be retained wherever possible.

HOUSING

Q9a - Should housing delivery be given higher priority than other development needs (e.g. employment land, community facilities)?

Yes

Q9b - How should we best address specialist housing needs (e.g. affordable housing; family housing; self-build housing; sheltered & extra care; houses in multiple occupation)?

-

Q9c - Efficient use of land will help to raise densities and will contribute towards meeting development needs. What potential impacts of this should the Council try to mitigate?

-

Q9d - Should the Council include a policy that would resist the inappropriate development of residential gardens?

Yes

DEVELOPMENT OPTIONS WITHIN THE TOWN

Q10a - Do you agree that the sites listed above provide the most significant redevelopment and regeneration opportunities to deliver housing, employment and leisure uses within the town?

No view

Q10b - Do you have any particular comments on how any of the identified sites should be developed and for what mix of uses?

No view

Q10c - Are there any other potential development sites within the current built up area that should be assessed?

No view

EDGE OF TOWN DEVELOPMENT OPPORTUNITIES

Q11a - Given the housing needs in the Borough do you have any views as to which of these sites should be developed or protected?

On behalf of our client we would urge that Site No. 8 (North of West Durrington) is given priority in

terms of its development in the new Local Plan. The site is immediately adjacent to the existing West Durrington allocated site from the current Local Plan and would represent a logical extension to this new community given it would be located between the current allocation and the A27.

Our client also supports the allocation of Site No. 6 (Caravan Club) which lies immediately adjacent to the existing urban area boundary and is surrounded by land that is either developed or is allocated for development with the exception of the sports centre to its immediate west. We also acknowledge that the site has a relatively low landscape, visual and ecological sensitivity. As set out elsewhere in this representation, our client is prepared to enter into discussions with the Borough Council to identify a potentially suitable alternative site to accommodate the Caravan Club use.

Our client would also like to support the allocation of Site No. 7 (West of Fulbeck Avenue) which is located within the built up boundary of Worthing.

Q11b - If any of these sites (in full or in part) are to be allocated for development do you have any views on how they should be developed?

In respect to Site No. 8 (North of West Durrington) the most logical means of accessing the site would be from appropriate locations on the spine roads located within the northern section of the existing West Durrington allocated site. It clearly would not be appropriate to access this land directly off the A27. Whilst we note the findings of the landscape study which suggests that development within the west of the site would have a significant and detrimental impact on the character of the landscape, we consider that a suitable and appropriate landscape design could be prepared that paid appropriate respect to the character of the landscape and yet delivered additional housing.

In respect of Site No. 6 (Caravan Club) we would suggest that an opportunity exists to provide a sensitively designed and located pedestrian and cycle link between the northern boundary of the caravan club site through the strip of designated SNCI to link with the two fields that we are promoting on behalf of our client as set out earlier in this form.

Q11c - If any of these sites are not allocated for development do you have any views on how they should be protected, enhanced or used?

If any of these sites are not allocated for development the existing use on site should continue but no special protection or designation should be given.

Q11d - Land West of Fulbeck Avenue (site 7) and Land north of West Durrington (site 8) are already within the Built Up Area boundary. In light of significant housing needs should the Council take a positive approach and look to bring forward these sites in advance of the adoption of the new Local Plan?

Yes – see responses above

PLANNING POLICIES

Q12a - Do you have any views on how any of the listed policies should be worded?

No


Q12b - Are there any policies missing from the list?

Yes – the allocation of the fields to the east of Titnore Lane as set out in the box at the beginning of this form.

Q12c - Are all of the listed policies required?

Yes

Please continue on separate sheets as necessary

Name:	Nigel Abbott	Signature	
Date:	Thursday 16 th June 2016		

REFERENCE

Comment number: WIO-M-46

Date received: 17/06/2016



Office Use only

Comment number:

Date received: 17 JUN 2016

Your Town –Your Future

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Consultation Document May 2016
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Email: worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	ANTONY
Last name	JONES
Organisation (where applicable)	
Address line 1	[Redacted]
Address line 2	
Address line 3	
Post Code	
Email address	

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PAGE 32, QUESTION 11.

GORING GAP, CRATSMORE FARM DEVELOPMENT:

- I FEEL THAT DEVELOPMENT ON THE 'GORING GAP' SOUTHSIDE, WOULD
- ① PUT SEVERE STRAIN ON LOCAL HEALTH FACILITIES, I.E. DOCTORS PRACTICES;
 - ② BUY A RARE AND BEAUTIFUL STRETCH OF LAND FROM ALDSWORTH AVENUE TO SEA LANE, FERRING, STRETCHING BACK TO THE WEX.
 - ③ CAUSE FLOODING RISK DUE TO UNDERGROUND STREAMS RUNNING DOWN FROM DOWNS BEHIND.
 - ④ CREATE OVER POPULATION TO THE LOCAL AREA, AND INCREASE PRESSURE ON AVAILABLE WATER, AND SEWERAGE FACILITIES.

Please continue on separate sheets as necessary

Name:	ANTHONY P. S. JONES	Signature	
Date:	15/6/16		



REFERENCE

Comment number: WIO-M-47

Date received: 17/06/2016

Office Use only

Comment number:

Date received: 17 JUN 2016

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Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	MAUREEN
Last name	JONES
Organisation (where applicable)	
Address line 1	
Address line 2	
Address line 3	
Post Code	
Email address	

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PAGE 32, Question 11

Goring Gap, Chatsmore farm development

I believe strongly that the development on the Goring Gap South side would


① put severe strain on local health facilities etc.

② It would destroy a beautiful stretch of land between Sea Lane Ferring and Aldsworth Avenue.

③ It would also cause ~~underground~~ flooding due to underground streams running from the downs behind.

④ It would increase pressure on water and sewage also.

Please continue on separate sheets as necessary

Name:	Maureen L. Jones	Signature	
Date:	15/6/16		



REFERENCE

Comment number: WIO-M-48

Date received: 20/06/2016

Office Use only

Comment number:

Date received:

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Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	EDITH
Last name	INGRAM
Organisation (where applicable)	
Address line 1	
Address line 2	
Address line 3	
Post Code	
Email address	wp

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Goring Gap and Chadsman Farm
 I write to protest against the Goring Gap North & South being used for housing & schools etc. Both Ferring & Goring have a feeling of their own shared by their population which is unique. Working certainly would not be the same + traffic which is now bad would be worse. People are attracted to this area because of the Gaps. Now that I am almost blind it is lovely to sit in the car & hear the birds in the gap. Buildings would have an awful effect on the landscape & there is also the risk of floods.
 I write on behalf of Mrs E Ingram Registered blind

Please continue on separate sheets as necessary

Name:	MRS EDITH Florence Betty Ingram	Signature	
Date:	13-6-16		



REFERENCE

Comment number: WIO-M-49

Date received: 20/06/2016

Office Use only

Comment number:

Date received:

Your Town - Your Future

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Consultation Document May 2016

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Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name: DENYS

Last name: INGRAM

Organisation (where applicable):

Address line 1:

Address line 2:

Address line 3:

Post Code:

Email address: No

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Ferry Gap + Chatswe Farm

I think that the green field sites should be protected & remain as they are

We have uninterrupted views of the sea and come for that reason as thousands come yearly via coach & train.


Building on these sites would have devastation on the area. The gap separates us from Ferring and all the agricultural ground will be gone all the natural bird life would be greatly diminished

Living amongst the green sites one feels rural existence with close facilities for town

I hope you understand this letter as I am 90 & appreciate living in green land!

D. Ingram

Please continue on separate sheets as necessary

Name:	MR DENYS INGRAM	Signature	
Date:	13/6/16		

REFERENCE

Comment number: WIO-M-50

Date received: 20/06/2016



Office Use only

Comment number:

Date received:

Your Town –Your Future

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44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

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Last name	HARWOOD
Organisation (where applicable)	
Address line 1	
Address line 2	
Address line 3	
Post Code	
Email address	

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Section B - Comments

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PAGE 32.

Q 11. EDGE OF TOWN DEVELOPMENT.
THE CORING GAP SOUTH SIDE AND GHATSHORE FARM.

AS RESIDENTS OF CORING FOR MORE THAN FORTY YEARS, WE FEEL THAT CORING AND FERRING SHOULD RETAIN THEIR UNIQUE INDEIVIDUALITY AND THAT THEY SHOULD NOT BE JOINED.


THE VIEW FROM THE SEA TOWARDS THE DOWNS IS VERY THERAPEUTIC FOR LOCALS AND VISITORS.

THE GAP IS ALSO OF GREAT IMPORTANCE FOR THE SEA BIRDS, EITHER RESTING OR SHELTERING FROM STORMS AT SEA.

WITH THE INCREASING POPULATION WE NEED ALL THE AGRICULTURAL LAND AVAILABLE, ONCE BUILT ON LAND CANNOT BE RETURNED TO FOOD PRODUCTION.

THE TRAFFIC ON THE WHOLE OF THE ROAD NETWORK IS ALREADY INADEQUATE AND FURTHER DEVELOPMENT WILL ONLY ADD TO THE PROBLEM.

Please continue on separate sheets as necessary

Name:	ELEANOR HARWOOD	Signature	
Date:	15.6.2016.		

REFERENCE

Comment number: WIO-M-51

Date received: 20/06/2016



Office Use only

Comment number:

Date received:

Your Town –Your Future

A new Local Plan for Worthing Consultation Document May 2016 Comments Form

Worthing Borough Council has started work on preparing a new Local Plan which will have a big influence on the town in the period up to 2033. The publication of the 'Your Town- Your Future' consultation document provides the first opportunity to comment on relevant issues and options.

This consultation runs from 11th May to 22nd June 2016.

Website: www.adur-worthing.gov.uk/worthing-local-plan

Email: worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	<input type="text" value="VILKY"/>
Last name	<input type="text" value="BAUGHAN"/>
Organisation (where applicable)	<input type="text" value="GOAING RESIDENTS"/>
Address line 1	<input type="text"/>
Address line 2	<input type="text"/>
Address line 3	<input type="text"/>
Post Code	<input type="text"/>
Email address	<input type="text" value="-"/>

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Section B - Comments

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Q11 EDGE OF TOWN DEVELOPMENT


SITE 4 GORING FERRING GAP

As the Landscape Study findings indicate any development of this area will be detrimental.

There has already been a planning application submitted for a Camp Site etc to be erected ~~and~~ ^{and} I am aware that the majority of residents (including myself) have already expressed their very definite views against permission being granted. No doubt other development of the gap would follow if this one is given permission to go ahead.

Whilst we all know that building land is in short supply the area must be retained for the outdoor enjoyment of all and its value as a wedge home. There are so few green areas left around us.

Please continue on separate sheets as necessary

Name:	MARK V BAUGHAN	Signature	
Date:	13 June 2016		

REFERENCE

Comment number: WIO-M-52

Date received: 20/06/2016



Office Use only

Comment number:

Date received:

Your Town –Your Future
A new Local Plan for Worthing
Consultation Document May 2016
Comments Form

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Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

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Last name	WIGHTMAN
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Email address	

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Comments

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THE GORING GAP / CHATSMORE FARM

The Goring Gap is unique in that it offers an uninterrupted view from the South Downs to the sea. Any building can only have a detrimental effect on that. I believe Chatsmore Farm is on a flood plain - surely a flooding risk there? My ornithological friends tell me that the gap is a habitat for sea birds and wading birds who rest and/or roost there in migration.

HMAC OFFICES

Perhaps much needed housing and/or a green space could be considered.

Please continue on separate sheets as necessary

Name:	MURDO WITCHMAN	Signature	[Redacted]
Date:	16 June 2016		

REFERENCE

Comment number: WIO-M-53

Date received: 20/06/2016



77 The Strand, Worthing, West Sussex BN12 6DR
Tel: 01903 700522 Email: info@maybridge.org.uk
www.maybridge.org.uk

Registered charity no. 1134469
Incorporating the work of the Mile Project

16th June 2016

Dear Sir/Madam,

Thank you for the opportunity to contribute towards the new Worthing Local Plan (WLP). We submit this letter in addition to the formal consultation response form as it enables us to contribute more directly to the needs and issues as we see them within the development of the WLP. We would be grateful therefore if this letter could be formally acknowledged as being included in the considerations to take place when the WLP responses are all in. If there is anything below you would like further information on, please let us know.

Worthing Local Plan Response by:

- **Maybridge Community Church** (Andy Hickford, Senior Minister)
- **Jubilee Church** (Colin Reid, Elder)
- **St Matthew's Church** (Rev John Chitham, Vicar)
- **Elfm Church** (Andrew Fadoju, Minister, and Chairman of Churches Together for Worthing)

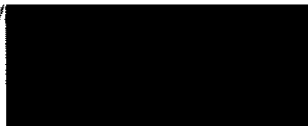
We would like to raise 6 main points as our response to the WLP:

1. We would ask that serious consideration is given in the WLP to the changing dynamics of church growth and church decline in Worthing. The landscape for churches will undoubtedly change more in the next 15 years than in the last 50 and Worthing must be prepared for this in order to meet the needs of its residents, both current and new. (see note 'a')
2. We would ask that a higher value is given in the WLP to flexible change of use for premises and land use to meet the needs of the community sector. It is essential that community groups, including churches, are able to show enterprise and be responsive to the changing needs of residents in Worthing, and that access to venues and land for churches is fair and equitable. We would especially urge the WLP to recognise that unused large commercial premises be allowed to become used by churches as is the case very successfully in many other towns similar to Worthing. Worthing is currently out of step with other towns and this should be addressed in the WLP. (see note 'b')
3. We would ask that the value of community life be as high as economic and commercial needs in the WLP. This will enhance the experience of residents and visitors and further boost the reputation of Worthing as a good place to live and visit.
4. We would ask that the value of churches to Worthing be more clearly recognised in the WLP. There is just one mention of faith groups in the consultation document. Churches in Worthing

have a long and successful history in providing community services (especially for children, youth, the elderly and the isolated), meeting the spiritual needs of residents, as employers of staff, as providers of community use venues for hires and meeting the needs of residents at times of joy and distress (birth dedications, marriages and funerals). These provisions will continue and develop over the next 15 years and the WLP can support this for current and new residents. (see note 'c')

5. We would ask that recognition is given to the enhanced value that is provided when churches own their premises as they become rooted in communities and can be more responsive and flexible to meet the changing needs of their communities. Churches who hire schools and other venues in order to meet or deliver projects have limitations that can hamper and restrict the benefit to Worthing that churches with buildings do not. The need for allocated land within existing and new communities is therefore in order to provide rooted support which has long term benefits. (see note 'd')
6. We would ask that, whilst recognising the pressure on housing, a clear statement appears in the WLP to house and integrate refugees and displaced peoples.

Yours sincerely



Andy Hickford, on behalf also of Andrew Fadajo, Colin Reid and John Chitham

Notes:

- a) *There has been both significant growth and significant decline in churches, depending on type of church, and difference in regions of the UK. The UK Christianity 2005-15 report shows a growth of more than 2,000 churches in England, with some denominations growing over 20% during this period. New churches, alternative expressions of church, independent churches and churches that are identified with ethnic groups are all on the increase. Traditional churches are in decline. The media's message is usually that church attendance is falling – it is heavily in some parts of the church but the opposite is happening in other parts and this is seen in Worthing. For example Maybridge Community Church has averaged 6% growth each year during the last 10 years and is now a community of 450 people. It, along with a number of other churches, have outgrown their premises and will need long term solutions supported within the WLP. In addition with 9% - 14% of people attending church (depending which survey is relied on) then it is assumed that if 600 new dwellings are built each year in Worthing as part of the WLP, then 60 will be filled by church attenders. That is about the same as a new average sized church being required in Worthing every 2 years, or the further expansion of the existing growing churches who are already in need of more space. We would also like to understand in the WLP the approach the Council will adopt in relation to places of worship that are no longer viable and how they might be disposed of in the context of the wider needs of the Borough. Churches that are currently thriving may wish to utilise these spaces and the support of the WLP would be significant in facilitating this.*

- b) *Towns nearby that have enabled churches to own or rent warehouse type accommodation include Chichester, Horsham, Brighton, Eastbourne and Hastings. There are numerous other examples across the UK, including coastal towns with similar pressures on land. The added advantage for these towns, in addition to meeting the current and future needs of church attenders are increased spaces for regional conferences, events and hires which add economic value to their towns. Multi-use venues such as these are very feasible and churches requirements should be seen as platforms for more than just church gatherings, and could have significant economic benefit throughout the year.*
- c) *The list of community activities provided or hosted by churches in Worthing is extensive and ever developing. Examples include Food Bank, language schools, Children and Family Centres, toddler groups, lunch clubs, Parish Nursing, re-cycling of furniture, care for the homeless, advocacy, advice, debt and money crisis support, youth work, kids clubs, holiday clubs, support for those addicted to alcohol or drugs, visiting the lonely, providing transport, caring for and enhancing the environment, low cost cafe. In addition church halls are used to enable other community and small businesses to deliver to the people of Worthing. There is a constant flow of requests for people who want good quality community space to hire and much has to be declined due to current lack of capacity.*
- d) *For example Maybridge Community Church exists on a plot of land on the Maybridge Estate originally granted by Worthing Borough Council and has for the last 61 years provided community programmes as well as church activities for this community and beyond. We are regarded and trusted because we have been able to show decade after decade what we are about and how we play a part in this area of Worthing. We are rooted. Having outgrown our building for our Sunday morning service (whilst also holding up to 3 services still on our site on a Sunday) we use Chatsmore Catholic High School as a venue. We therefore have first-hand experience of being both rooted and a hirer of a building once a week. The opportunities are much greater for all parties when we can be rooted in a community and we propose this is the way forward for churches that are growing and wanting to expand over the next 15 years.*

REFERENCE

Comment number: WIO-M-54

Date received: 20/06/2016



Office Use only

Comment number:

Date received:

Your Town –Your Future

**A new Local Plan for Worthing
Consultation Document May 2016
Comments Form**

Worthing Borough Council has started work on preparing a new Local Plan which will have a big influence on the town in the period up to 2033. The publication of the 'Your Town- Your Future' consultation document provides the first opportunity to comment on relevant issues and options.

This consultation runs from 11th May to 22nd June 2016.

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Email: worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	TERENCE
Last name	CHAPMAN
Organisation (where applicable)	
Address line 1	
Address line 2	
Address line 3	
Post Code	
Email address	

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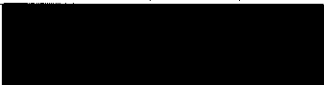
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[Empty box for comments]

Please continue on separate sheets as necessary

Name:	TERENCE CHAPMAN	Signature	
Date:	15.6.16		



I have the following comments:

Tourism

Q5 a) Yes, apart from my suggestion at b);

b) The Council does not adequately advertise the town's tourist sites. For example, the annually published leaflet 'Sussex Top Attractions' contains details of 66 tourist attractions in the 2016 edition, but none of them, apart from the South Downs National Park, are in Worthing. Surely Worthing has some attractions that could be included!

Environment

Q8 a) Yes.

b) The Teville gate area is a disgrace and has been left in a state of dereliction for too long. Given the need for housing, this area should be given over entirely to housing and the development of high rise flats which would help towards meeting the housing need. If necessary, the area should be the subject to compulsory purchase if the present owners continue their inactivity.

c) Yes: no development should be permitted in the gaps between settlements.

d) Very high value: given the lack of green spaces in Worthing they should all be retained free of any sort of development.

Housing The objectively assessed housing need of 12,720 dwellings (2013-33) 636 dwellings per year is no more than educated guess work at best and the figures should be treated as such.

Q9 a) Yes

b) Affordable homes should form a part of all housing developments.

c) Do not build on greenfield sites.

d) Yes

Development Options within the town

Q10 a) Yes

b) In all these sites housing should be paramount.

c) No

T. Chapman

Edge of Town Development Opportunities

Q11 a) Given the lack of green spaces within Worthing none of these areas should be developed and all should be protected.

d) No.

T Chapman

REFERENCE

Comment number: WIO-M-55

Date received: 20/06/2016



Office Use only

Comment number:

Date received: 20 JUN 2016

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Consultation Document May 2016
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Email: worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	ANDREW
Last name	BATES-JOYCE
Organisation (where applicable)	
Address line 1	
Address line 2	
Address line 3	
Post Code	
Email address	

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RE EDGE OF TOWN DEVELOPMENT:-

SITE 4 - GORING/FERRING GAP

SITE 5 - CHATSMORE FARM.

KEY ISSUES - BOTH SITES ARE A CHARACTERISTIC NEED OF THE SEA SIDE WITH BEACH AND COUNTRYSIDE CRITICAL TO CONTINUE TO BE PROTECTED FOR COMMUNITY, ECONOMY, ENVIRONMENT AND HERITAGE CONSERVATION. THESE ARE VITAL LIVING/BREATHWING AREAS.

Please continue on separate sheets as necessary

Name:	Andy Bates-Joyce	Signature	
Date:	16-6-2016		

REFERENCE

Comment number: WIO-M-56

Date received: 16/06/2016

Adur District Council response to Worthing Local Plan Consultation Document published May 2016.

Please note this is an officer-level response.

General Comments:

The Memorandum of Understanding (MOU) between Adur District Council and Worthing Borough Council, signed March 2016, sets out Adur District and Worthing Borough Council's situation with regards to potentially unmet OAN for housing and employment. (Please be aware Adur is likely to update its OAN work with regards to 2014 population and household projections; it is likely that the District's shortfall will increase).

Both authorities share common planning issues and problems including the difficulty of providing new homes and employment floorspace to meet future needs within a highly constrained environment and with infrastructure pressures. Both local authorities are constrained to meet their full objectively assessed housing and employment needs. Adur may also have a small Gypsy and Traveller pitch accommodation shortage subject to further work on the relocation of the Withy Patch site.

The knowledge and understanding between the two Councils of issues and constraints impacting on both authorities is significant; the MOU states that the two authorities will continue to cooperate actively and diligently on all cross-boundary planning matters with a view to achieving the proper planning of the wider area.

Specific Comments:

Strategic Objectives: the Community section might benefit from a recognition of the challenges arising from ageing population. Given the predicted growth in the older age groups, this is likely to be a matter that Adur and Worthing will both need to address.

Transport: Adur will continue to work with Worthing to ensure that issues relating to the transport network experienced in Adur and Worthing areas (particularly those affecting the Strategic Road Network) are addressed by the relevant authorities.

Q11 Edge of Town development Opportunities. The inclusion of site 3, land at Upper Brighton Road, is noted. You will be aware that this site lies adjacent to land within Adur District, currently designated as strategic gap and countryside in the adopted Adur Local Plan 1996. This area is also designated as countryside and Local Green Gap in the emerging Adur Local Plan. (Please see Amendments to the Proposed Submission Adur Local Plan (2016)). Please note also the boundaries of the Sompting Conservation Area; any adverse impact on the setting of the conservation area should be avoided.

In addition you will be aware that the emerging Adur Local Plan allocates land at West Sompting for a total of 480 dwellings. Please have regard to this allocation in any assessment of this (or other relevant) sites particularly with regards to transport (relevant studies may be found at: <http://www.adur-worthing.gov.uk/planning-policy/adur-background-studies-and-info/infrastructure-transport/>).

New pedestrian and cycle links are likely to be created from this allocation, eastwards across the gap to Worthing (please see Policy 6 of the emerging Adur Local Plan, and emerging Sompting Neighbourhood Plan). The evidence base for the Adur Local Plan also includes several documents in relation to landscape, which include this area (please see Landscape and Ecological Survey of Key Sites within Adur 2012 and Landscape Study Update 2016 for further information).

Please also note Policy 10: Sompting, which states in part:

"... Improvements to West Street and/or the A27 and wider transport network to reduce through-traffic in Sompting village will be sought; these should respect the character of the conservation area."

Thank you for providing the opportunity to comment.

Moira Hayes,
Principal Planning Officer.

16th June 2016

REFERENCE

Comment number: WIO-M-57

Date received: 17/06/2016

Pauline Morris [REDACTED]

18 Jun (3 days ago)

to me

Pauline Morris
[REDACTED]

Protection of Goring Gap and Chatsmore Farm.

I strongly believe that the above Greenfield sites should be protected and remain as they are.

These areas are very welcome green spaces in a heavily residential area and provide an interlude between Goring and Ferring.

It should not be underestimated how much beauty and benefit are enjoyed by countryside and farmed fields. The wealth of flora and fauna which are associated with these spaces are very important and must be protected. Quality of life would be much reduced for those living in Goring if these areas were to be developed.

More traffic, more congestion, more pollution would result if a large housing development were to replace valuable farmed land. Walking around these areas now I can forget I am in the busy south of England and while houses clearly, must be built, please protect these particular sites and allow us, albeit briefly, to believe we are in the countryside!

Pauline Morris.

REFERENCE

Comment number: WIO-M-58

Date received: 18/06/2016

Theresa Bevans [REDACTED]

18 Jun (3
days ago)

to me

Dear Sir/Madam,

Please see attached completed comments form on the new local plans for our town of Worthing. Please let me know if you need a signature. Thank you for taking my views into consideration.

Section B - Comments

The consultation document summarises issues and options within thematic sections. General comments can be inserted in the box below and comments about specific sections of the Plan can be made in response to some key questions that follow.

Firstly, I applaud your intent to keep green places in Worthing free from being built on. However, I must write and voice my concerns over the amount of building that is going on everywhere. Already we have areas of flooding and a couple of summers ago Southern Water had to pump raw sewage into the sea as it could not cope, Building more houses on previous green meadows has a knock on effect for the current population of Worthing and of course for the wild life. I notice than when new houses are crammed into areas there are no fairly big open spaces left with nice garden areas for adults and children to enjoy near their new homes that is pleasing on the eyes, a calming place for both adults and children to enjoy and relax. Our environment has an effect on our health.

Being surrounded by concrete is not good for the psyche. Seeing nature is. Then there are the extra at least 1,000 cars on the local roads for 1,000 houses! Some of these building companies do not even live in the town and return to their lovely environments, leaving us to live in a concrete jungle happily having made fat profits. We must also think of the capacity of our local hospital as well and the effect more people living in Worthing will have on the already overstretched health care.

I was born and raised in Worthing and have lived here all my life – 62 years and I could cry at the amount of grazing and farm land being concreted over. God forbid we ever need to feed ourselves as a country, we will have little area left to grow anything. Perhaps we should help the farmers so that they do not feel they have to sell to these building companies. We need green open spaces. Our mental and physical health depend on it. Please consider the Worthingites who already live here.

I sincerely hope I do not live to see Goring gap filled to capacity with concrete and cars. We need to protect our green areas, especially those separating areas such as Ferring and Goring. These green areas are habitats for our wildlife and essential for our wellbeing, as stated above. The council members will be remembered for their effect on the town whilst in control.

Thank you for giving us the opportunity to give our views.

Theresa Bevans

(If you need a signature I can sign and scan the document and resend, please let me know)

VISION

Q1a - Do you agree with the Vision we are aiming and aspiring to achieve?

See comments above

Q1b - Does it provide a clear direction for the Worthing Local Plan?

Q1c - Is there anything you think we have missed which you would like to see incorporated in the Vision?

See comments above

STRATEGIC OBJECTIVES

Your Town - Your Future

A new Local Plan for Worthing Consultation Document May 2016 Comments Form

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Email: please email this completed form to worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council,
Portland House, 44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

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	Bevans		
Organisation (where applicable)			
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Address line 2	Goring-by-sea		
Address line 3	West Sussex		
Postcode	BN126AR	Telephone	01903 503514
Email address	theresabevans@googlemail.com		

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Q2a - Do you agree with the proposed objectives set out above? If not, what changes would you like to see?

Q2b - Are the objectives sufficiently distinctive and locally specific?

ECONOMY

Q3a - Do you agree with the key challenges identified for the economy? Are any missing?

Q3b - Should the Local Plan continue to protect key employment areas or should it be more flexible in its approach?

Q3c - In addition to the sites already identified as having the potential to deliver employment land are there any other sites that could accommodate employment growth?

RETAIL AND THE TOWN CENTRE

Q4a - Have all the key challenges for retail areas and the Worthing town centre been identified, if not what has been missed?

Q4b - Are retail centres functioning well - how can they be improved?

Q4c - How could new development in the town centre enhance the town's identity and attract more visitors?

TOURISM

Q5a - Have the key challenges for tourism been addressed?

Q5b - In what ways can the tourism offer be improved?

COMMUNITY AND LEISURE FACILITIES

Q6a - Do you agree with the main challenges identified in planning for the provision of different infrastructure needs? Are any missing?

Q6b - Do you have suggestions for how the Local Plan could resolve these?

Q6c - Are you aware of any particular community and leisure needs?

We need ore areas of public gardens and benches for people to enjoy

TRANSPORT

Q7a - Do you agree with the main challenges identified? Are any missing?
Q7b - Do you have any suggestions for how the Local Plan could better promote sustainable transport?

ENVIRONMENT

Q8a - Do you agree with the main environmental challenges identified? Are any missing?
See comments above
Q8b - Do you have any suggestions for how the Local Plan could reach a balance between competing needs?
Areas of housing development should include green open spaces for the community to enjoy
Q8c - Are there any circumstances you consider where regardless of mitigation, development would be inappropriate?
On land that separates communities eg Ferring and Goring
Q8d - What value do you place on the borough's green spaces, particularly those around the town?
The green spaces should be preserved for people and wildlife.

HOUSING

Q9a - Should housing delivery be given higher priority than other development needs (e.g. employment land, community facilities)?
See comments above
Q9b - How should we best address specialist housing needs (e.g. affordable housing; family housing; self-build housing; sheltered & extra care; houses in multiple occupation)?
Q9c- Efficient use of land will help to raise densities and will contribute towards meeting development needs. What potential impacts of this should the Council try to mitigate?
Q9d - Should the Council include a policy that would resist the inappropriate development of residential gardens?
Absolutely that is essential for the harmony of residents of the town

DEVELOPMENT OPTIONS WITHIN THE TOWN

Q10a - Do you agree that the sites listed above provide the most significant redevelopment and regeneration opportunities to deliver housing, employment and leisure uses within the town?
See comments above
Q10b - Do you have any particular comments on how any of the identified sites should be developed and for what mix of uses?
Q10c - Are there any other potential development sites within the current built up area that should be assessed?

EDGE OF TOWN DEVELOPMENT OPPORTUNITIES

Q11a - Given the housing needs in the Borough do you have any views as to which of these sites should be developed or protected?
See comments above
Q11b - If any of these sites (in full or in part) are to be allocated for development do you have any views on how they should be developed?
Q11c - If any of these sites are not allocated for development do you have any views on how they should be protected, enhanced or used?
Q11d - Land West of Fulbeck Avenue (site 7) and Land north of West Durrington (site 8) are already within the Built Up Area boundary. In light of significant housing needs should the Council take a positive approach and look to bring forward these sites in advance of the adoption of the new Local Plan?

PLANNING POLICIES
Q12a - Do you have any views on how any of the listed policies should be worded?
Q12b - Are there any policies missing from the list?
Q12c - Are all of the listed policies required?

Please continue on separate sheets as necessary

Name:	Theresa Bevans	Signature	
Date:	18th June 2016		

REFERENCE

Comment number: WIO-M-59

Date received: 19/06/2016

Joan Muller 

19 Jun (2 days ago)

to me

Public consultation Goring Gap and Chatsmore Farm:

This area should very definitely be protected from any kind of development.

It separates the two communities and their Councils of Goring and Ferring.

The gap offers beautiful views from the Downs to the sea and sea to the Downs and the whole character and beauty of the area would be spoilt.

Development would mean the destruction of agricultural land and the effect on wildlife would be detrimental.

Apart from that the area is known to be at risk of flooding.

At least some 'countryside' around Goring-by-sea/Worthing should be preserved.

It is sad to see green field sites lost to rather hideous developments such as where the Sixth Form College playing fields used to be.

J Muller


REFERENCE

Comment number: WIO-M-59a

Date received: 20/06/2016

Joan Muller [REDACTED]

11:12 (21 hours ago)

to me

Public consultation: HMRC offices area

Important as stated under "Strategic Objectives: Community"

to "Safeguard family homes and the character and amenity of residential areas".

So, if this area is developed for "mixed use" any structures should be sensitively chose to blend in as far as possible with the existing character of the area to the south of this site, which means no high rise buildings.


Best use: probably doctors' surgery and offices.

Also, any development should if possible not result in any substantial increase in traffic flow, as access to Shaftesbury Avenue is already difficult enough.

REFERENCE

Comment number: WIO-M-60

Date received: 19/06/2016

Ian Fairclough 

19 Jun (2 days ago)

to me

Dear Planning Policy Team

I attach my comments form for the Worthing Borough Council Local Plan consultation.

Regards

Ian Fairclough

High Salvington Windmill

Your Town - Your Future

**A new Local Plan for Worthing
Consultation Document May 2016
Comments Form**

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Website: www.adur-worthing.gov.uk/worthing-local-plan

Email: please email this completed form to worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council,
Portland House, 44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	Ian		
Last name	Fairclough		
Organisation (where applicable)	High Salvington Windmill		
Address line 1	[REDACTED]		
Address line 2	Worthing		
Address line 3			
Postcode	[REDACTED]	Telephone	[REDACTED]
Email address	[REDACTED]		

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Section B - Comments

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I note there is no mention of the High Salvington windmill in the plan. The windmill, which is fully operational, is a very valuable community asset to Worthing as a tourist attraction and as an educational benefit to local school children. It is essential that it is included in the plan to ensure that no planning action can be implemented that would be detrimental to the preservation and operation of this historic structure.

VISION

Q1a - Do you agree with the Vision we are aiming and aspiring to achieve?

Q1b - Does it provide a clear direction for the Worthing Local Plan?

Q1c - Is there anything you think we have missed which you would like to see incorporated in the Vision?

STRATEGIC OBJECTIVES

Q2a - Do you agree with the proposed objectives set out above? If not, what changes would you like to see?

Q2b - Are the objectives sufficiently distinctive and locally specific?

ECONOMY

Q3a - Do you agree with the key challenges identified for the economy? Are any missing?

Q3b - Should the Local Plan continue to protect key employment areas or should it be more flexible in its approach?

Q3c - In addition to the sites already identified as having the potential to deliver employment land are there any other sites that could accommodate employment growth?

RETAIL AND THE TOWN CENTRE

Q4a - Have all the key challenges for retail areas and the Worthing town centre been identified, if not what has been missed?

Q4b - Are retail centres functioning well - how can they be improved?

Q4c - How could new development in the town centre enhance the town's identity and attract more visitors?

TOURISM

Q5a - Have the key challenges for tourism been addressed?

Q5b - In what ways can the tourism offer be improved?

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Q6a - Do you agree with the main challenges identified in planning for the provision of different infrastructure needs? Are any missing?

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Q6c - Are you aware of any particular community and leisure needs?

TRANSPORT

Q7a - Do you agree with the main challenges identified? Are any missing?

Q7b - Do you have any suggestions for how the Local Plan could better promote sustainable transport?

ENVIRONMENT

Q8a - Do you agree with the main environmental challenges identified? Are any missing?

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Q12a - Do you have any views on how any of the listed policies should be worded?
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Q12b - Are there any policies missing from the list?
--

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Q12c - Are all of the listed policies required?

--

Please continue on separate sheets as necessary

Name:	Ian Fairclough	Signature	
Date:	20th June 2016		

REFERENCE

Comment number: WIO-M-61

Date received: 19/06/2016

19 Jun (2 days ago)

[REDACTED]
to me

Dear Sirs

Not happy that with both the proposed widening of the A27 through Worthing and these plans of building more houses, we only find out through gossip and rumour and not officially told through proper channels. Makes me think that you don't want us to find out until it is too late to do anything! Certainly not happy that you seem to be proposing to build houses on the proposed site for Bramber Primary schools playing field. My children currently attend there and have not got a playing field which is an absolutely disgraceful!

The proposed plan of building houses at the top of Beeches Avenue was rejected last time due to the fact that the local infrastructure couldn't cope with the additional amount of traffic the houses would bring, this is still the case! Also where do you propose to move Worthing F.C?

The proposed widening of the A27 has many different plans of where it is going to go and therefore will effect any proposed building plans you may have. It would be best of all the tackle that issue first as these plans in the past have been abandoned with many people losing there homes from compulsory purchasing.

It would be nice if we could here the truth of what is going on rather than just rumour. Also it would be good to think that this has been well thought out which I don't and therefore I am strongly against these plans, but I feel you will do as you please regardless.

Yours sincerely

REFERENCE

Comment number: WIO-M-62

Date received: 20/06/2016

20 Jun (1 day ago)


to me, Kathryn, John, Barry, Vernon

Please find attached the Ilex Conservation Group's comments on the Worthing Local Plan consultation document, May 2016

Regards

Bob Niall
(Secretary, Ilex Conservation Group)

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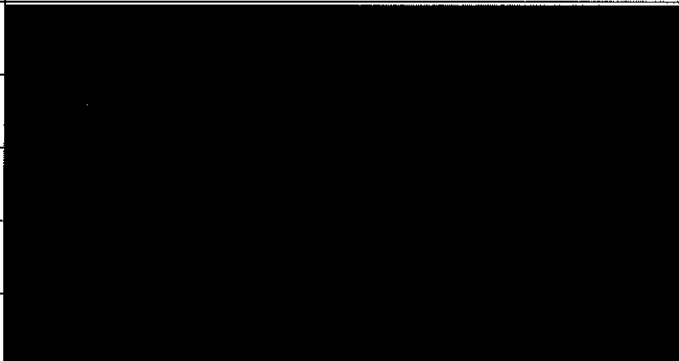
Website: www.adur-worthing.gov.uk/worthing-local-plan

Email: please email this completed form to worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council,
Portland House, 44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	Robert
Last name	Niall
Organisation (where applicable)	Illex Conservation Group
Address line 1	
Address line 2	
Address line 3	
Postcode	
Email address	

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Section B - Comments

The consultation document summarises issues and options within thematic sections. General comments can be inserted in the box below and comments about specific sections of the Plan can be made in response to some key questions that follow.

We would request that sites 4 and 5 be referred to Goring Gap south and north respectively as we feel that to name the northern part as "Chatsmore Farm" detracts from the cohesive nature and worth of the gap as a whole, part of the value being in the uninterrupted views to and from Highdown over both parts of the gap.

Whilst the attraction of business to the borough is essential to maintain and improve the perceptions and quality of life, we also feel that promotion as a seaside destination is important and this is where we seem to be lacking in recent years. A popular, vibrant destination for tourists must also benefit the inhabitants of the borough both in the amenities necessary but also in prosperity.

VISION

Q1a - Do you agree with the Vision we are aiming and aspiring to achieve?

Yes

Q1b - Does it provide a clear direction for the Worthing Local Plan?

Generally

Q1c - Is there anything you think we have missed which you would like to see incorporated in the Vision?

Perhaps priority for affordable housing should be given to local people or workers

STRATEGIC OBJECTIVES

Q2a - Do you agree with the proposed objectives set out above? If not, what changes would you like to see?

We should like to see consideration of small possibly electric buses and park and ride as part of the sustainable modes of transport. We should also like to see adequate toilet facilities across the town.

Q2b - Are the objectives sufficiently distinctive and locally specific?

We hope to see more development of detail as the plan progresses and explanation of definitions such as "appropriate" (level of affordable housing) and "enhance" when considering green spaces.

ECONOMY

Q3a - Do you agree with the key challenges identified for the economy? Are any missing?

No - Where will the tourist accommodation be (the latest loss is the Kingsway) We consider that there is adequate food provision (Tripadvisor currently lists 255 restaurants, take aways and coffee shops in Worthing) Where and how would pharmaceuticals expand (GSK is now a small cog in a very large wheel) Storage and distribution suggests an RDC again unlikely as congested transport links and only a 180 degree distribution spread. Is education provision linked to housing provision / children's needs or also to cater for needs outside the Borough?

Q3b - Should the Local Plan continue to protect key employment areas or should it be more flexible in its approach?

More flexible

Q3c - In addition to the sites already identified as having the potential to deliver employment land are there any other sites that could accommodate employment growth?

Yes – GSK playing fields

RETAIL AND THE TOWN CENTRE

Q4a - Have all the key challenges for retail areas and the Worthing town centre been identified, if not what has been missed?

Quality – Worthing does not have the feel of Chichester or Bognor. The plan mentions fewer stores needed following the internet revolution. Possibly smaller rather than fewer would be the target.

Q4b - Are retail centres functioning well - how can they be improved?

Too many charity shops and pawnbrokers – reflecting the local populace and lack of quality independent retailers.

Q4c - How could new development in the town centre enhance the town's identity and attract more visitors?

Attract diverse high quality small independent businesses perhaps by reducing business rates – especially for start-up businesses.

TOURISM

Q5a - Have the key challenges for tourism been addressed?

No

Q5b - In what ways can the tourism offer be improved?

Better child facilities – Available paddling pool. Boating lake in the centre or dedicated transport to Brooklands. Encourage coach trips from Worthing such as we used to have with boards on the sea front available to book there the same or next day. Encourage operators of small boats for trips either from the pier / beach or arrangement with Littlehampton / Shoreham / Brighton. Encourage an aquarium or other such seaside attraction. Recently Worthing seems to forget it is a seaside town.

COMMUNITY AND LEISURE FACILITIES

Q6a - Do you agree with the main challenges identified in planning for the provision of different infrastructure needs? Are any missing?

Yes

Q6b - Do you have suggestions for how the Local Plan could resolve these?

No

Q6c - Are you aware of any particular community and leisure needs?

No

TRANSPORT

Q7a - Do you agree with the main challenges identified? Are any missing?

Yes. The A27 west of Worthing is also very congested and easing by an Arundel by-pass would greatly help. Road congestion outside of peak periods is also very frequent on the A259 and the A27 east.

Q7b - Do you have any suggestions for how the Local Plan could better promote sustainable transport?

Park and ride. Electric buses. Provision for electric car charging and consideration to free parking for electric cars.

ENVIRONMENT
Q8a - Do you agree with the main environmental challenges identified? Are any missing?
Yes – none missing but mention is made of Worthing as an area of serious water stress. How will new development sit with this while retaining good clean available water supply?
Q8b - Do you have any suggestions for how the Local Plan could reach a balance between competing needs?
No
Q8c - Are there any circumstances you consider where regardless of mitigation, development would be inappropriate?
Current green spaces including the Goring Gap(s) – North and south.
Q8d - What value do you place on the borough's green spaces, particularly those around the town?
Essential for wellbeing and for maintenance and enhancement of Worthing's environment for both residents and visitors.

HOUSING
Q9a - Should housing delivery be given higher priority than other development needs (e.g. employment land, community facilities)?
No – community facilities should come first
Q9b - How should we best address specialist housing needs (e.g. affordable housing; family housing; self-build housing; sheltered & extra care; houses in multiple occupation)?
With a high percentage of workers having their work outside the town, we need to be careful of becoming a dormitory town. With the latest government initiatives, is the demand for buy to let and holiday homes diminished? We consider that in the main, "affordable" homes (unless association rented" are only affordable on first purchase. We consider that the concentration should be on quality family housing and to maintain current provisions of sheltered and extra care accommodation. HMOs should not be encouraged.
Q9c- Efficient use of land will help to raise densities and will contribute towards meeting development needs. What potential impacts of this should the Council try to mitigate?
If this refers to high rise blocks on the seafront, this is reverting to the 60s and 70s which we believe downgraded Worthing. Should high rise away from the seafront be contemplated, this should target families without young children and should be of a density appropriate to avoid estates or potential poor and overcrowded areas and "sinks".
Q9d - Should the Council include a policy that would resist the inappropriate development of residential gardens?
Yes


DEVELOPMENT OPTIONS WITHIN THE TOWN
Q10a - Do you agree that the sites listed above provide the most significant redevelopment and regeneration opportunities to deliver housing, employment and leisure uses within the town?
Yes but redevelopment of the Guildbourne Centre would offer many opportunities.
Q10b - Do you have any particular comments on how any of the identified sites should be developed and for what mix of uses?
No
Q10c - Are there any other potential development sites within the current built up area that should be assessed?
The Plaza bingo hall.

EDGE OF TOWN DEVELOPMENT OPPORTUNITIES
Q11a - Given the housing needs in the Borough do you have any views as to which of these sites should be developed or protected?

Sites 4 and 5 (Goring Gap) should be protected, site 6 (caravan club) should be updated and retained as an amenity. There is concern over where site 2 (WUFC) would be relocated.
Q11b - If any of these sites (in full or in part) are to be allocated for development do you have any views on how they should be developed?
High quality family housing
Q11c - If any of these sites are not allocated for development do you have any views on how they should be protected, enhanced or used?
Sites 4 and 5 should be afforded as much protection as possible as an invaluable asset with no "enhancement" in the foreseeable future. Site 6 should be updated to encourage more usage and retention as a tourist attraction and amenity
Q11d - Land West of Fulbeck Avenue (site 7) and Land north of West Durrington (site 8) are already within the Built Up Area boundary. In light of significant housing needs should the Council take a positive approach and look to bring forward these sites in advance of the adoption of the new Local Plan?
No

PLANNING POLICIES
Q12a - Do you have any views on how any of the listed policies should be worded?
No
Q12b - Are there any policies missing from the list?
Re-position Worthing as a seaside resort
Q12c - Are all of the listed policies required?
Yes

Please continue on separate sheets as necessary

Name:	Robert Niall	Signature	
Date:	19.06.16		

REFERENCE

Comment number: WIO-M-63

Date received: 20/06/2016

ong, Catherine
(NE) <Catherine.Tonge@naturalengland.org.uk>
to me

12:35 (20 hours ago)

Thank you for giving Natural England the opportunity to comment on the Issues and Options Consultation for Worthing's Local Plan. We trust that you are still considering our comments on earlier stages of this Plan. My brief additional comments are as follows:

The Environment section (p12) should ideally specifically reference the need to avoid harm to designated sites and irreplaceable habitats.

Care may be needed during consideration of the Aquarena, Stagecoach Marine Parade and Grafton sites (and, to a lesser extent the Goring – Ferring Gap site) to ensure that the England Coastal Path National Trail route will be unaffected

The development potential of sites which include: the best and most versatile agricultural land, habitats and wildlife corridors and stepping stones, or areas likely to be used by protected species; should be carefully considered. It may be inappropriate to use all or parts of such sites, unless there is no less valuable land suitable for the proposed development or the need for development outweighs the value of the site in terms of its biodiversity and/or its function as part of the habitat network.

Due to the current pressure of consultations on land-use plans, I have not been able to spend the time I would have wished reviewing this document. Nevertheless, I hope you have found the comments helpful. If there are issues I have not covered, please let me know and I will respond as quickly as possible. If discussion would be helpful, please contact me.

If you wish to comment on the service provided by Natural England please use the appended form.

Catherine

Catherine Tonge
Lead Adviser
Sustainable Development
Natural England
Mobile: [REDACTED]

Home-based. Post to:

Mail Hub: Natural England, County Hall, Spetchley Road, Worcester WR5 2NP

<https://www.gov.uk/government/organisations/natural-england>

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing

Teleconference details – 0800 073 0694 access code 739 489 6800

Natural England is accredited to the Cabinet Office Customer Service Excellence Standard

REFERENCE

Comment number: WIO-M-64

Date received: 20/06/2016

12:57 (20 hours ago)

[REDACTED]
to me

Comments for land north of Beeches Avenue, Worthing

Names: John Martin, Sally Nichols, Warren Nichols
[REDACTED]

Our comments:

Beeches Avenue is currently a quiet cul-de-sac. Building to the north will greatly increase the traffic flow and create even more problems exiting the road at the south end where it meets the main A27.

This is already a problem.

The north end of properties are all bungalows, which are not overlooked which will not be the case if houses are built, which will completely destroy the character of the road.

We reside in Number 49, which is the most northern bungalow which has views across open fields and is not overlooked, an aspect which is reflected in its value.

Houses built right next to our property will affect our privacy and property value.

We understand there are several colonies of bats in the area of the paddocks which are protected.

We all trust the correct appropriate decision will be made in the interests of the area, our property, the environment and us.

Many thanks

REFERENCE

Comment number: WIO-M-65

Date received: 20/06/2016

[REDACTED]

13:08 (19 hours ago)

to me

I attach my reply to the Local Plan for Worthing Consultation Document May 2016.

Philip Barber
Attachments area

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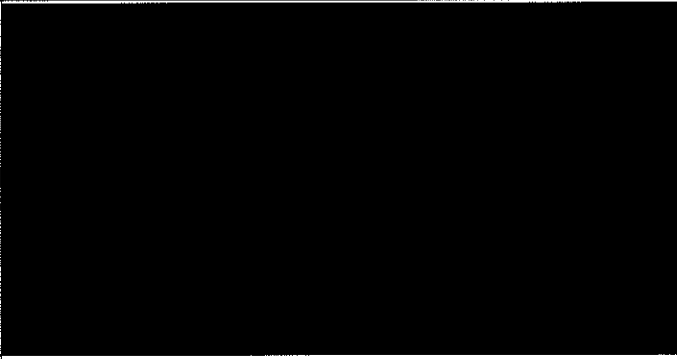
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Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council,
Portland House, 44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	Philip
Last name	Barber
Organisation <i>(where applicable)</i>	
Address line 1	
Address line 2	
Address line 3	
Postcode	
Email address	

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EDGE OF TOWN DEVELOPMENT OPPORTUNITIES

Q11a - Given the housing needs in the Borough do you have any views as to which of these sites should be developed or protected?

George Orwell in 1940 wrote that "the gentleness of English civilisation is its most marked characteristic", this applies equally to the land as well.

The Goring Gap both North & Southside should be protected from development at any time.

They separate the two communities of Goring & Ferring, each a separate and important identity.

The gap offers an uninterrupted and unique view from the sea to the South Downs.

Building would have a significant and detrimental effect on the character of the landscape.

This land is grade 1 agricultural land and will be destroyed if developed.

What a lot of people do not see is that once land is developed on it will never be able to return to its original form.

Once it's gone it's gone.

What with the rise in sea levels and unpredictable weather patterns and living adjacent to this land I am very concerned that it will no longer act as a sponge and a barrier for excess water.

Not only will the developed properties be prone to possible flooding but my own property will suffer.

We need this land untouched under any circumstances.

The gap is also a habitat for sea and wading birds who are roosting or resting during migration and inclement weather.

It is a rural environment with easy urban access.

Decisions on this land should be made by local people for local people as in the cause of true

democracy, not by some government official who has never visited the Gap, knows its geography or the feeling of local people.

In 1962 patriotic Labour leader Hugh Gaitskell warned that European rule would mean "the end of a thousand years of history" for Britain, this also applies to decisions made to the land.

If the gaps are built upon the prediction will swiftly become a reality

Please keep the gaps free.

Q11b - If any of these sites (in full or in part) are to be allocated for development do you have any views on how they should be developed?

Q11c - If any of these sites are not allocated for development do you have any views on how they should be protected, enhanced or used?

Q11d - Land West of Fulbeck Avenue (site 7) and Land north of West Durrington (site 8) are already within the Built Up Area boundary. In light of significant housing needs should the Council take a positive approach and look to bring forward these sites in advance of the adoption of the new Local Plan?

PLANNING POLICIES

Q12a - Do you have any views on how any of the listed policies should be worded?

Q12b - Are there any policies missing from the list?

Q12c - Are all of the listed policies required?

Please continue on separate sheets as necessary

Name:	Philip Barber	Signature	
Date:	20/06/2016		

REFERENCE

Comment number: WIO-M-66

Date received: 20/06/2016

14:53 (18 hours ago)


to me

Dear Sir/Madam

I submit the following comments to the Local Plan on behalf of Transition Town Worthing – Transport Group, as attached

Regards

Rod Thick – Chair of Transport Group

Your Town - Your Future

A new Local Plan for Worthing Consultation Document May 2016 Comments Form

Worthing Borough Council has started work on preparing a new Local Plan which will have a big influence on the town in the period up to 2033. The publication of the 'Your Town - Your Future' consultation document provides the first opportunity to comment on relevant issues and options.

This consultation runs from **11th May to 22nd June 2016**

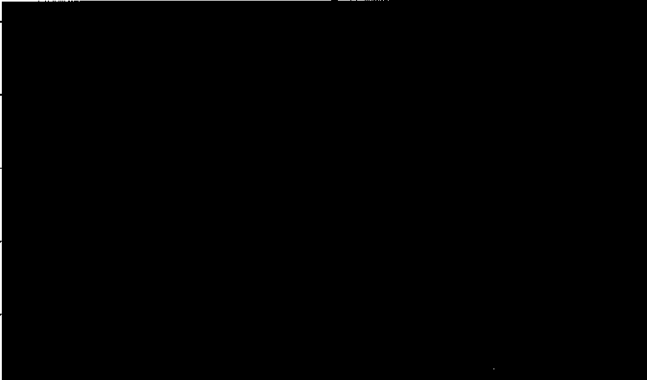
Website: www.adur-worthing.gov.uk/worthing-local-plan

Email: please email this completed form to worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council,
Portland House, 44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	Rod
Last name	Thick
Organisation (where applicable)	Transition Town Worthing – Transport Group
Address line 1	
Address line 2	
Address line 3	
Postcode	
Email address	

You can respond to this consultation online or by email. However, if your preference is to make comments manually this form can be photocopied as many times as necessary.

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Section B - Comments

The consultation document summarises issues and options within thematic sections. General comments can be inserted in the box below and comments about specific sections of the Plan can be made in response to some key questions that follow.

Dear Sir/Madam

I submit the following comments to the Local Plan on behalf of Transition Town Worthing – Transport Group

Regards

Rod Thick – Chair of Transport Group

1/ Meeting the required national guidelines regarding air quality should be complied with in all instances within the Local Plan

2/ Solar vehicle charging points should be fitted to all public car parks within Worthing & Adur plus in the town centre's of Worthing, Shoreham, Lancing & Southwick by June 2017

3/ The Local Plan should state that Worthing & Adur will aim to become carbon neutral by 2020

4/ There should be more evening bus services to allow the public an alternative form of transport to the car

**5/ We consider one of the most cost-effective and popular intervention: provide decent cycleways to get around town
Worthing has high rates of cycling, despite the horribly dangerous road conditions: the KSI rate for cyclists in the town is double that of other West Sussex towns. We have a decades-old cycle network plan that has been completely neglected, we have funding for a fix to the mess at the western end of the Prom yet progress has halted, and we have £4.8 million of "sustainable transport" funding being mis-spent on Montague Street repaving. Imagine what cycleways could be built with £4.8 million!**

VISION

Q1a - Do you agree with the Vision we are aiming and aspiring to achieve?

Q1b - Does it provide a clear direction for the Worthing Local Plan?

Q1c - Is there anything you think we have missed which you would like to see incorporated in the Vision?

STRATEGIC OBJECTIVES

Q2a - Do you agree with the proposed objectives set out above? If not, what changes would you like to see?

Q2b - Are the objectives sufficiently distinctive and locally specific?

ECONOMY

Q3a - Do you agree with the key challenges identified for the economy? Are any missing?

Q3b - Should the Local Plan continue to protect key employment areas or should it be more flexible in its approach?

Q3c - In addition to the sites already identified as having the potential to deliver employment land are there any other sites that could accommodate employment growth?

RETAIL AND THE TOWN CENTRE

Q4a - Have all the key challenges for retail areas and the Worthing town centre been identified, if not what has been missed?

Q4b - Are retail centres functioning well - how can they be improved?

Q4c - How could new development in the town centre enhance the town's identity and attract more visitors?

TOURISM

Q5a - Have the key challenges for tourism been addressed?

Q5b - In what ways can the tourism offer be improved?

COMMUNITY AND LEISURE FACILITIES

Q6a - Do you agree with the main challenges identified in planning for the provision of different infrastructure needs? Are any missing?

Q6b - Do you have suggestions for how the Local Plan could resolve these?

Q6c - Are you aware of any particular community and leisure needs?

TRANSPORT

Q7a - Do you agree with the main challenges identified? Are any missing?

Q7b - Do you have any suggestions for how the Local Plan could better promote sustainable transport?

ENVIRONMENT

Q8a - Do you agree with the main environmental challenges identified? Are any missing?

Q8b - Do you have any suggestions for how the Local Plan could reach a balance between competing needs?

Q8c - Are there any circumstances you consider where regardless of mitigation, development would be inappropriate?

Q8d - What value do you place on the borough's green spaces, particularly those around the town?

HOUSING

Q9a - Should housing delivery be given higher priority than other development needs (e.g. employment land, community facilities)?

Q9b - How should we best address specialist housing needs (e.g. affordable housing; family housing; self-build housing; sheltered & extra care; houses in multiple occupation)?

Q9c - Efficient use of land will help to raise densities and will contribute towards meeting development needs. What potential impacts of this should the Council try to mitigate?

Q9d - Should the Council include a policy that would resist the inappropriate development of residential gardens?

DEVELOPMENT OPTIONS WITHIN THE TOWN

Q10a - Do you agree that the sites listed above provide the most significant redevelopment and regeneration opportunities to deliver housing, employment and leisure uses within the town?

Q10b - Do you have any particular comments on how any of the identified sites should be developed and for what mix of uses?

Q10c - Are there any other potential development sites within the current built up area that should be assessed?

EDGE OF TOWN DEVELOPMENT OPPORTUNITIES

Q11a - Given the housing needs in the Borough do you have any views as to which of these sites should be developed or protected?

Q11b - If any of these sites (in full or in part) are to be allocated for development do you have any views on how they should be developed?

Q11c - If any of these sites are not allocated for development do you have any views on how they should be protected, enhanced or used?

Q11d - Land West of Fulbeck Avenue (site 7) and Land north of West Durrington (site 8) are already within the Built Up Area boundary. In light of significant housing needs should the Council take a positive approach and look to bring forward these sites in advance of the adoption of the new Local Plan?

PLANNING POLICIES

Q12a - Do you have any views on how any of the listed policies should be worded?

Q12b - Are there any policies missing from the list?

Q12c - Are all of the listed policies required?

Please continue on separate sheets as necessary

Name:	Rod Thick	Signature	R. Thick
Date:	20-6-16		

REFERENCE

Comment number: WIO-M-67

Date received: 20/06/2016

16:30 (16 hours ago)

[REDACTED]
to me, Anne

Dear Sirs, please find attached the duly completed WLP Comments Form from the Field Place Area Resident's Association (FPARA)

Please confirm receipt and that FPARA has met the deadline.

Best Regards

Martyn Bell- Chairman, FPARA



Office Use only
Comment number:
Date received:

Your Town - Your Future

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Website: www.adur-worthing.gov.uk/worthing-local-plan

Email: please email this completed form to worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council,
Portland House, 44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	Martyn
Last name	Bell
Organisation <i>(where applicable)</i>	Field Place Area Residents' Association (FPARA)
Address line 1	
Address line 2	
Address line 3	
Postcode	
Email address	

You can respond to this consultation online or by email. However, if your preference is to make comments manually this form can be photocopied as many times as necessary.

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Section B - Comments

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FPARA agrees with the need for a Local Plan and supports its general direction. Hopefully an approved WLP will prevent ad hoc Development and help protect our 'strategic gaps' and other green spaces. However we do have a number of specific issues which are raised below and an overall concern about lack of details concerning Doctor's Surgeries, Schooling, Cycle Paths and Parking Provision. Adequate Infrastructure must go hand-in-hand with Development and be treated as an equal priority.

VISION

Q1a - Do you agree with the Vision we are aiming and aspiring to achieve?

Generally Yes, but more emphasis needed on enhancing quality of life for residents

Q1b - Does it provide a clear direction for the Worthing Local Plan?

Yes

Q1c - Is there anything you think we have missed which you would like to see incorporated in the Vision?

Quality of Life, designed discouragement of car use, adequate infrastructure at same time as Development

STRATEGIC OBJECTIVES

Q2a - Do you agree with the proposed objectives set out above? If not, what changes would you like to see?

Yes

Q2b - Are the objectives sufficiently distinctive and locally specific?

Include adequate car parking provision and cycle paths /storage

ECONOMY

Q3a - Do you agree with the key challenges identified for the economy? Are any missing?

YES-but help support evening economy with adequate public transport

Q3b - Should the Local Plan continue to protect key employment areas or should it be more flexible in its approach?

Be more flexible

Q3c - In addition to the sites already identified as having the potential to deliver employment land are there any other sites that could accommodate employment growth?

Retail/services within new Developments

RETAIL AND THE TOWN CENTRE

Q4a - Have all the key challenges for retail areas and the Worthing town centre been identified, if not what has been missed?

Affordable Parking Provision/ Covered Bike Racks

Q4b - Are retail centres functioning well - how can they be improved?

Not really. Bus Depot on Seafront environmentally/ visually very negative. More specialist shops eg Ackerman's Music. Create a Brighton 'Lanes' environment

Q4c - How could new development in the town centre enhance the town's identity and attract more visitors?

Have more 'destination' stores & excellent Café's like 'Sea Lane' in Goring

TOURISM

Q5a - Have the key challenges for tourism been addressed?

Beach front Homelessness/Street Drinking a real negative- and these people need help.

Q5b - In what ways can the tourism offer be improved?

Have 'Sunny Worthing' slogan backed by actual Met statistics. Encourage existing water sports expertise. Worthing also as a Gateway to the SDNP. Improve sea front 'street scene' at Grafton Car Park adjacent to M&S.

COMMUNITY AND LEISURE FACILITIES

Q6a - Do you agree with the main challenges identified in planning for the provision of different infrastructure needs? Are any missing?

Yes,

Q6b - Do you have suggestions for how the Local Plan could resolve these?

Work closely with local Residents' Associations

Q6c - Are you aware of any particular community and leisure needs?

Allotments must be protected and more made available. Ensure Leisure activities in residential areas are appropriate and do not create noise pollution and other disturbance. Provide adequate parking for Splashpoint and the Aquarena development.

TRANSPORT

Q7a - Do you agree with the main challenges identified? Are any missing?

Yes. A27 improvement a priority. Development of Cycle paths and Storage (under-cover) needed behind seafront/across Borough. 'Boris Bikes' potential?

Q7b - Do you have any suggestions for how the Local Plan could better promote sustainable transport?

Ensure adequate/disciplined car parking at Railway Stations. Develop proper network of Cycle Paths and Storage (undercover where poss.)

ENVIRONMENT

Q8a - Do you agree with the main environmental challenges identified? Are any missing?
YES
Q8b - Do you have any suggestions for how the Local Plan could reach a balance between competing needs?
Focus on Brownfield.
Q8c - Are there any circumstances you consider where regardless of mitigation, development would be inappropriate?
The Strategic Gaps must be protected. 'Mitigation' a pre-requisite & must be meaningful.
Q8d - What value do you place on the borough's green spaces, particularly those around the town?
An extremely high value.

HOUSING
Q9a - Should housing delivery be given higher priority than other development needs (e.g. employment land, community facilities)?
No, they must all go hand-in-hand – particularly Medical and Schooling facilities. Also adequate Policing.
Q9b - How should we best address specialist housing needs (e.g. affordable housing; family housing; self-build housing; sheltered & extra care; houses in multiple occupation)?
Affordable Housing should be truly affordable. HMO's must have adequate parking provision or consent refused.
Q9c - Efficient use of land will help to raise densities and will contribute towards meeting development needs. What potential impacts of this should the Council try to mitigate?
Once again, parking problems.
Q9d - Should the Council include a policy that would resist the inappropriate development of residential gardens?
In general yes, but there may be some appropriate opportunities

DEVELOPMENT OPTIONS WITHIN THE TOWN
Q10a - Do you agree that the sites listed above provide the most significant redevelopment and regeneration opportunities to deliver housing, employment and leisure uses within the town?
YES
Q10b - Do you have any particular comments on how any of the identified sites should be developed and for what mix of uses?
Regeneration of Teville Gate(5) & Grafton Car Park frontage(3) crucial & urgent. Houses for families needed, not just flats eg HMRC site. Mixed retail & residential but also incorporating Medical facilities eg GP Surgeries & appropriate Leisure eg Gyms, as well as schools.
Q10c - Are there any other potential development sites within the current built up area that should be assessed?
Not that we are aware of.

EDGE OF TOWN DEVELOPMENT OPPORTUNITIES
Q11a - Given the housing needs in the Borough do you have any views as to which of these sites should be developed or protected?
Goring-Ferring Gap (4) and Chatsmore Farm (5) must be protected. Where will relocated sites (2) and (6) go?
Q11b - If any of these sites (in full or in part) are to be allocated for development do you have any views on how they should be developed?
Houses not flats.

Q11c - If any of these sites are not allocated for development do you have any views on how they should be protected, enhanced or used?

Nature Reserves/Open Space public amenity

Q11d - Land West of Fulbeck Avenue (site 7) and Land north of West Durrington (site 8) are already within the Built Up Area boundary. In light of significant housing needs should the Council take a positive approach and look to bring forward these sites in advance of the adoption of the new Local Plan?

No. await approval. Supply should be adequate in medium term.

PLANNING POLICIES

Q12a - Do you have any views on how any of the listed policies should be worded?

No

Q12b - Are there any policies missing from the list?

Emphasise Drainage system requirements for new Developments, parking provision/discipline at Transport Hubs eg Durrington-on-Sea Railway Station, Specific needs for GP Surgeries & Schools.

Prevent destruction of Grass Verges by rogue parkers and HGV's specific policy.

Q12c - Are all of the listed policies required?

Yes

Please continue on separate sheets as necessary

Name:	Martyn Bell	Signature	
Date:	20.6.16		

REFERENCE

Comment number: WIO-M-68

Date received: 20/06/2016

19:32 (13 hours ago)

[REDACTED]
to me

From: Pauline Reymond,
Resident

[REDACTED]
re. Site north of Beeches Avenue, and Worthing United Football Ground.

On 4 April 2006 The Planning Inspectorate dismissed the appeal by Hargreaves Residential Developments Ltd against Worthing Borough Council's decision to reject Hargreaves application to build 92 dwellings on this land.

One of the main reasons for dismissal was that it was unsafe to permit access from Beeches Avenue onto A27 for this proposed development.

That was in 2006 - since then traffic numbers have increased significantly and usage of A27 has increased, so the argument for not including this land for future development in a Local plan remains. and I consider it unwise to include this land in a Local Plan as being suitable for development.

Although this land is not in SDNP it forms the start of the South Downs - if this land were lost to housing where would development stop? We could end up losing all our downland to development.

I believe strongly that development within the Borough should be upwards, so long as it does not scar the coastline or downland.

Worthing United Football Club provides an important sporting facility that should not be lost to housing.

REFERENCE

Comment number: WIO-M-69

Date received: 20/06/2016

22:50 (10 hours ago)


to me

Hi

Please find feedback relating to the 'Your Town - Your Future' consultation.

Regards

Your Town - Your Future

**A new Local Plan for Worthing
Consultation Document May 2016
Comments Form**

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Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council,
Portland House, 44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	Barry		
Last name	Borrett		
Organisation (where applicable)			
Address line 1	[REDACTED]		
Address line 2	[REDACTED]		
Address line 3			
Postcode	[REDACTED]	Telephone	[REDACTED]
Email address	[REDACTED]		

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Section B - Comments

The consultation document summarises issues and options within thematic sections. General comments can be inserted in the box below and comments about specific sections of the Plan can be made in response to some key questions that follow.

--

VISION

Q1a - Do you agree with the Vision we are aiming and aspiring to achieve?

Yes. I believe its just as important to attract employers as well as build homes. House building seems to be taking priority. I am also pleased to the seafront clearly recognised. The current seafront is beautiful, however I feel more can be added to the seafront in regards additional visitor attractions.

Q1b - Does it provide a clear direction for the Worthing Local Plan?

Q1c - Is there anything you think we have missed which you would like to see incorporated in the Vision?

STRATEGIC OBJECTIVES

Q2a - Do you agree with the proposed objectives set out above? If not, what changes would you like to see?

Q2b - Are the objectives sufficiently distinctive and locally specific?

ECONOMY

Q3a - Do you agree with the key challenges identified for the economy? Are any missing?

Q3b - Should the Local Plan continue to protect key employment areas or should it be more flexible in its approach?

Q3c - In addition to the sites already identified as having the potential to deliver employment land are there any other sites that could accommodate employment growth?

RETAIL AND THE TOWN CENTRE

Q4a - Have all the key challenges for retail areas and the Worthing town centre been identified, if not what has been missed?

Q4b - Are retail centres functioning well - how can they be improved?

Q4c - How could new development in the town centre enhance the town's identity and attract more visitors?

Towns in the local area have clear visitor attractions. Harbour Park, Butlins and Brighton Pier are clear visitor attractions on the south coast. Worthing is no more than a bridge with a cafe at the end. Building something new near our coastline will highlight Worthing in regards visitor attractions. There are shops in most town centres so unique restaurants should be allowed to flourish.

TOURISM

Q5a - Have the key challenges for tourism been addressed?

Q5b - In what ways can the tourism offer be improved?

We have some attractions i.e. theatres and the Dome but they are ageing and it need of refurbishment to all of these places. I would suggest saving yearly and working towards full refurbishments of all those places rather than continuous minor adjustments. Theatres in Crawley and Horsham and much more appealing.

COMMUNITY AND LEISURE FACILITIES

Q6a - Do you agree with the main challenges identified in planning for the provision of different infrastructure needs? Are any missing?

I agree with the options. I would also suggest that upgrading of these facilities is included as the plan is due to last 20 years. Has the leisure centre improved? It offers a variety of activities but I cannot recall it money being spent to improve it. The Astroturf was replaced. The pitch was exactly the same size as before. Large fences were erected to separate the pitches but the amounts of Astroturf were the same as before.

Q6b - Do you have suggestions for how the Local Plan could resolve these?

Local facilities seem to be managed by local non profit making trusts. This may take the burden off the council but if they are not making any money where will the money come from to upgrade these places? It appears to keep the status quo.

Q6c - Are you aware of any particular community and leisure needs?

TRANSPORT

Q7a - Do you agree with the main challenges identified? Are any missing?

Q7b - Do you have any suggestions for how the Local Plan could better promote sustainable transport?

--

ENVIRONMENT

Q8a - Do you agree with the main environmental challenges identified? Are any missing?
--

--

Q8b - Do you have any suggestions for how the Local Plan could reach a balance between competing needs?

--

Q8c - Are there any circumstances you consider where regardless of mitigation, development would be inappropriate?
--

--

Q8d - What value do you place on the borough's green spaces, particularly those around the town?
--

--

HOUSING

Q9a - Should housing delivery be given higher priority than other development needs (e.g. employment land, community facilities)?

No. Building houses for the sake of the OAN number will only add pressure to other facilities i.e. schools, hospitals, leisure facilities. Any building should take into consideration other needs.

Q9b - How should we best address specialist housing needs (e.g. affordable housing; family housing; self-build housing; sheltered & extra care; houses in multiple occupation)?

--

Q9c - Efficient use of land will help to raise densities and will contribute towards meeting development needs. What potential impacts of this should the Council try to mitigate?
--

Ensure efficient use of space is not out of character of the area.
--

Q9d - Should the Council include a policy that would resist the inappropriate development of residential gardens?

Yes. We will always needs areas of beauty with town/cities with appropriate suitable seating these areas allow various residents to congregate in the same place.

DEVELOPMENT OPTIONS WITHIN THE TOWN
--

Q10a - Do you agree that the sites listed above provide the most significant redevelopment and regeneration opportunities to deliver housing, employment and leisure uses within the town?
--

Yes. 1-5 should be considered for leisure facilities due to their excellent location within the town. 6-10 should be given priority of house building.
--

Q10b - Do you have any particular comments on how any of the identified sites should be developed and for what mix of uses?

--

Q10c - Are there any other potential development sites within the current built up area that should be assessed?
--

--

EDGE OF TOWN DEVELOPMENT OPPORTUNITIES

Q11a - Given the housing needs in the Borough do you have any views as to which of these sites should be developed or protected?
--

North of Beeches Avenue: I recall building was rejected in this area previously. The A27 is busy enough without adding several hundred homes up there and all trying to get onto the A27.

Upper Brighton Road: Access would again be on the A27 one way or via West Street. This is currently a rat run but any additional cars would make the road unusable. West street has street parking and is basically a single lane carriage way for both directions. Traffic management must be considered for all these areas.

Q11b - If any of these sites (in full or in part) are to be allocated for development do you have any views on how they should be developed?

Q11c - If any of these sites are not allocated for development do you have any views on how they should be protected, enhanced or used?

Q11d - Land West of Fulbeck Avenue (site 7) and Land north of West Durrington (site 8) are already within the Built Up Area boundary. In light of significant housing needs should the Council take a positive approach and look to bring forward these sites in advance of the adoption of the new Local Plan?

PLANNING POLICIES

Q12a - Do you have any views on how any of the listed policies should be worded?

Q12b - Are there any policies missing from the list?

Q12c - Are all of the listed policies required?

Please continue on separate sheets as necessary

Name:		Signature	
Date:			

REFERENCE

Comment number: WIO-M-70

Date received: 17/06/2016

PlanningSSD

17 Jun (4
days ago)

to me, Ian

Dear Ian and Tracy,

Thank you for consulting the Environment Agency on your Issues and Options document. Our advice relates to specific comments regarding the Issues and options, Strategic Objectives, Key Challenges, and Areas of Change and then continue on to the Policies themselves.

Environment Strategic Objectives

Page 12

The objectives set out in the box on Page 12 relate to the Environment. We support the objective which seeks to 'Make full and efficient use of previously developed land in recognition of the environmental and physical constraints to development posed by the sea and the South Downs.'

We would like to see the inclusion of an objective that refers to avoiding development in areas with the greatest risk of flooding.

We would also like to see the inclusion of an objective that refers to the water environment. In particular that refers to the protection of both groundwater and surface water quality, makes direct reference to the Water Framework Directive, water resources and water efficiency.

Page 19

Page 19 paragraph 3 refers to how the Strategic Flood Risk Assessment can be used to make informed decisions on development, and inform the appropriateness of any potential sites in areas at a high risk of flooding. However, it does not go far enough. It should be made clear that the flood risk hierarchy should be followed in the allocation and development of sites with highest areas of flood risk being avoided.

Page 19 paragraph 4 correctly identifies Worthing as being in an area of serious water stress given that water efficiency is mentioned later in the document as a planning policy topic area, this would be a good place to refer to it so that specific challenges can be identified.

Environment Key Challenges

Page 20

In answer to questions on page 20 with reference to the challenges not identified, there is no identified key challenge that relates to the water environment. Direct reference should be made to the Water Framework Directive and its aims to enhance and protect water quality. As a co

deliverer of the Directive your plan should contribute to its aims and objectives through the delivery of development.

We support the inclusion of 'minimise pollution and other adverse effects on the local/natural environment' however we feel that it should go further and include the 'remediation of land through redevelopment'.

We support the inclusion of the Key Challenge to 'Take into account climate change over the long term' but feel that it should go further to include the mitigation and adaptation to the impact of climate change

We support the inclusion of enhancement and management of networks of biodiversity and green infrastructure.

Areas of Change

With regard to the Strategic sites under Areas of Change, we are somewhat concerned that no reference is made in the supporting text as to how these sites have been through the process of sequential testing with regard to flood risk as is required by paragraphs 100-102 of the NPPF. The Sequential Test should be undertaken when allocating sites to ensure development is directed to the areas of lowest flood risk. The Sequential Test should be informed by the Local Planning Authorities Strategic Flood Risk Assessment (SFRA).

We have concerns with the following sites;

- 1 Aquarena
- 2 - Stagecoach Site, Marine Parade
- 3 - Grafton Site
- 4 - Decoy Farm
- 5 - Goring-Ferring Gap
- 6 - Chatsmore Farm

At this time feel that the allocation of these sites would be unsound as there is no evidence to demonstrate that the sequential test has been passed. If you can demonstrate that the sequential test can be passed then there should also be evidence provided to determine that these sites are deliverable in terms of flood risk. As far as we are aware this evidence has not yet been provided. It is important that your Plan considers whether the flood risk issues associated with these sites can be safely managed to ensure development can come forward. Without this understanding we are unsure how your Plan can demonstrate compliance with the NPPF.

We also have site specific comments on the following sites that need to be considered in the allocation process and would that they are dealt with as development criteria within any allocation.

Areas of Change – Development Options within the Town

Teville Gate

Any development around the station area should take into account the culverted watercourse that runs through the site and has historically resulted in flooding. The course and capacity of this should be taken into account. You should look for opportunities where appropriate to deculvert.

British Gas Site

We support the redevelopment of this site. Any remediation must be appropriate to the proposed end use. Consideration must be given to the surface water drainage scheme due to the likely contamination of the site and any remediation options. Surface water must not be discharged through contaminated soils. As a result consideration of the land take implications for surface water drainage are needed.

Marletts Way

The redevelopment of this potentially contaminated site is supported. The site lies on a major aquifer and remediation of this site would aid in the protection of groundwater resources.

Decoy Farm

This area of change includes parts of flood zones 2 and 3. The sequential approach needs to be taken when allocating this site.

The Decoy Farm site is adjacent to the Teville stream. This would need to be protected against any adverse effects of future development. It should also be noted that construction of any bridges over the Teville stream would be required to be of clear span design. We would be opposed to any culverting of the watercourse. An adequate buffer of the Teville stream would also be required to mitigate against any adverse effects of potential development. It has also been noted that invasive plant species are present on the site and a scheme to eradicate these would need to be put in place if the site was to be taken forward.

Opportunities should also be sought to enhance and restore the Teville stream, this would include the removal of culverts wherever possible and restoring the stream to a more natural state. Any development in this area should help to deliver the objectives of the Water Framework Directive.

From a groundwater perspective we would support the redevelopment of the site with appropriate remediation to ensure the protection of controlled waters. Surface water drainage must not be discharged through contaminated soils and therefore appropriate consideration should be given to the necessary land take implications of the drainage design.

Areas of Change – Edge of Town Development Opportunities

The following sites are located within a groundwater Source Protection Zone 1 and therefore the following comments are applicable to all of them;

- 1 - North of Beeches Avenue
- 2 - Worthing United FC
- 3 - Upper Brighton Road
- 4 - North of West Durrington

We have defined Source Protection Zones (SPZs) for 2000 groundwater sources such as wells, boreholes and springs used across the country for public drinking water supply. These zones are more sensitive to contamination from activities that might cause pollution in the area. The closer the activity, the greater the risk. SPZ1s are the areas designated as most at risk from contamination and development activities.

When drawing up wastewater treatment proposals for any development, the first presumption is to provide a system of foul drainage discharging into a public sewer to be treated at a public sewage treatment works (those provided and operated by the water and sewerage companies). We

recommend development is phased to ensure the appropriate infrastructure is in place to support growth. We advise consultation with Southern Water to understand any constraints in the local area.

Caravan Club, Titnore Way

If the site is to be taken forward it would be important to retain the green corridors such as the tree and woodland belts with a green infrastructure strategy, providing multifunctional green space being vital. From GIS screening this site appears to mainly comprise of grassland habitat with a large lake to the north of the site.

It will also be important to retain and adequately buffer the existing wetland features on and adjacent to the site and if the caravan club site is to be taken forward opportunities should be sought for wetland and pond creation. It will be necessary to undertake the relevant surveys prior to the submission of applications for development at all of the proposed sites to fully assess the impact on nature conservation.

Planning Policies

Sustainable Design – We support the inclusion of the policy topic.

Biodiversity - We support this policy topic and would encourage an emphasis on the creation and enhancement of an integrated green infrastructure network within Worthing. We support the inclusion of the Green Infrastructure policy topic.

Pollution and Contamination – We support the inclusion of this policy topic and would encourage that the policy would go further to encourage remediation and opportunities to improve sites through development.

Water Quality and Protection – We support the inclusion of this policy topic and would like to encourage the inclusion of direct reference to the Water Framework Directive, as this will aid in efforts to seek the improvement of waterbodies.

Flood Risk and Sustainable Drainage – We support the inclusion of this policy topic and would encourage that the policy follows the flood risk management hierarchy and goes further to state that development be directed away from areas at the highest risk of flooding.

I trust that the above comments and recommendations are useful. If you require any further information or wish to discuss further please do not hesitate to contact me using the details below. We are keen to continue to work with you on this process as your plan develops.

Yours sincerely

Sophie Brown

Sophie Brown | Planning Advisor | Sustainable Places | Solent and South Downs Area | Environment Planning and Engagement
Environment Agency | Guildbourne House | Chatsworth Road | Worthing | BN11 1LD
Tel: 02030257250 | Internal: 57250 | [REDACTED]
sophie.brown@environment-agency.gov.uk

REFERENCE

Comment number: WIO-M-71

Date received: 20/06/2016

Helen Silman

23:18 (10 hours ago)

to me

Dear Tracy,
I have attached below the High Salvington Residents' Association's response to the Local Plan Consultation.
Thank you for all your help with documentation etc.
With kind regards

Response to Local Plan Consultation 2016

NAME: Helen Silman

ORGANISATION: High Salvington Residents' Association (HSRA)

ADDRESS: c/o [REDACTED]

PHONE NUMBER: [REDACTED]

Email: [REDACTED]

General Comments.

HSRA is an association with 840 households as members (so more than 840 people!) I have been a committee member for 2 and a half years, first for planning matters and since last year for the A27 project and the wider environment.

I have formed responses to the consultation based on what I have heard from residents and from discussions with other committee members.

The similarity with Transition Town Worthing's response is because I prepared the initial notes for the TTW submission.

I have emphasised WBC's limited powers to implement its ambitions because it seems to me from many conversations with local people that it is not apathy which deters people from taking part in local/national elections and consultations. Rather it is because many people feel despair because the WBC (and others) do not take their views seriously and too often WBC promises actions which WBC lacks the powers to deliver. Would it be better only to propose modest policies which WBC can actually hope to carry out rather than grand visions which will not come to fruition?

It is clear that a lot of thought and effort has been invested in this first stage of producing a new Local Plan. The HSRA really appreciates this and hopes that some of the well-intentioned responses given here will influence what comes next.

VISION AND OBJECTIVES

VISION

Q1 a. b. and c.

The vision is unimaginative and could be said of any south east coastal community.

It takes insufficient account of 3 key factors:

1. Continuing global economic instability
2. Accelerating climate change resulting in continuing weather and environmental instability
3. The fact that WBC has very little, if any, influence or control over infrastructure. Consequently, privatised services such as bus and rail services and house building; public services such as roads, local health care and (increasingly) education are beyond local control. For these reasons many of the challenges highlighted in this document cannot be met locally and we are all subject to ever more centralised government.

The sustainability of all developments and every development's resilience to economic and weather turbulence should feature in every aspect of the local plan.

We have the opportunity to become a town which leads by example in facing up to these huge challenges positively and creatively.

STRATEGIC OBJECTIVES

COMMUNITY Q2

a. and b. The sentiments are excellent BUT most of it is beyond WBC control and even points 5 and 6 which WBC may want to achieve and may try to ensure are subject to central government demands. WBC has insufficient money to take on developers in appeal proceedings (there are occasional exceptions) Conditions attached to planning approvals are rarely enforced for the same reason.

ECONOMY Q2

Again excellent ambition but WBC has little/no power to deliver.

WBC has no control over privatised public transport – buses and trains – It has no control over the vehicular entrance routes to Worthing because either Highways England for the Ministry for Transport or West Sussex County Council controls roads.

WBC has not even been able to facilitate the development of Teville Gate, the worst eyesore in Worthing visible to everyone arriving at the station or crossing over the railway bridge.

The Local Plan has not confronted the intention by central government to widen the A27 to 4 lanes through heavily populated residential areas in north Worthing. This issue more than any other will impact communities throughout Worthing and not just along the A27 corridor itself. Homes and gardens will be demolished at a time of acute housing shortage. North/south roads will become ever more congested. The destruction of vegetation along the route coupled with the increased traffic will result in ever worsening air pollution and so ever worsening health conditions associated with pollution. The northern entrance to our town will be irreparably degraded. The adverse impact on our town's economy during the demolition and construction phases and the consequent surge of traffic onto the A259 and other smaller local residential roads will not be easily overcome. There is absolutely no sign that rail links will improve – ever – and bus services between north and south Worthing and along the A27 will be severely disrupted for months/years and some bus routes may be closed altogether. All this will be going on during the first few years of our new Local Plan, yet nowhere are there suggestions as to how to mitigate the adverse impacts either in the long or short term.

ENVIRONMENT Q2

a. and b. This is an outstanding declaration of intent but quite at odds with the very limited powers of WBC.

Point 6 highlights the gap between WBC's fine aspirations and its incapacity to deliver them.

KEY ISSUES

ECONOMY Q3

- a. Community spaces and public services are not mentioned. Is a hierarchy of need really necessary .
- b. Flexibility is good

- c. Does working from home or running a business from home make a house count as 'employment land'?

RETAIL AND WORTHING TOWN CENTRE Q4

- a. no comment
- b. later opening hours in the evenings – at least during summer months. After 5.30pm the centre is almost deserted. There is no café culture or late night shopping opportunity at present - only pubs and restaurants.
- c. Put the band stand back or some similar structure offering shelter. Install more seating and flower planters. Add more shade by planting new trees and of course keeping the existing ones. Better street cleaning and litter enforcement would help improve the ambience in the centre.

TOURISM

- a. and b.

Worthing need not mimic on a small scale what other coastal towns do already. Should Worthing waste resources trying to compete with and outdo Brighton and Chichester?

Leafy Worthing has its own unique charm and can offer a range of outdoor/indoor pursuits as well as cultural events. There is an opportunity here perhaps to promote a slightly calmer, friendlier, less frenetic seaside holiday centre as an alternative to Brighton.

Make better use of the sea.

Set up a maritime heritage museum/education centre.

Introduce small boat trips to view the coastal strip and the wind farm.

COMMUNITY and LEISURE FACILITIES Q6

- a. and b. The Plan has excellent aims. Infrastructure needs are identified but how will they be funded and implemented.
- c. Infrastructure for disabled people (to include visually impaired and special needs children) needs to be improved everywhere especially for motorised wheel chairs.

TRANSPORT Q7

What concerns residents in our area most of all is the proposed widening of the A27 . Will WBC guarantee that bus services from High Salvington and Findon Valley will continue to run uninterrupted during

construction and thereafter? What will happen to Emergency Services access during and after the road widening? What proposals will WBC implement to improve cycling lanes in the area?

How will north- south access be maintained before and after the widening? These issues cannot just be ignored by WBC in the preparation of a new Local Plan to present to an Inspector. The road widening will change the character of north Worthing and will have knock on effects for Worthing's local roads to the south and north. An integrated, sustainable transport system is everyone's desire, but where are the powers and proposals to deliver it?

ENVIRONMENT Q8

This is an excellent summary, including climate change constraints.

a. Yes.

b. Only when specific competition arises. ALL developments should include areas for trees, vegetation and public/community spaces. ALL hard surfaces should be permeable. ALL new and refurbished buildings should be properly insulated and have solar PV and solar thermal panels to reduce dependence on fossil fuel energy and centralised supply networks.

c. Yes. eg Goring Gap, Titnore Lane woodland and areas of the SDNP.

d. Residents in HSRA place immeasurable value on Worthing's remaining green spaces. They give Worthing distinctiveness, contribute to the good health and well being of everyone regardless of age and income. They make Worthing a kind of oasis in the coastal concrete ribbon and the increasingly toxic road networks surrounding us all.

HOUSING Q9

This is probably the most difficult issue.

a. If it is divorced from other infrastructure issues: water stress, energy consumption, schools, health care, transport, parking, leisure and overarching environmental concerns more social problems will arise. So WBC has the most difficult task to synchronise house building with parallel infrastructure improvements.

b. Identify needs early on in the development process. Developments should include units for individuals and families of different sizes. There should be public green spaces incorporated and community building(s) too.

- c. Population density should keep pace with infrastructure improvements. All developments should have electric vehicle charging points and permeable hard surfaces.
- d. YES for all the health/environmental aspects already mentioned. This should apply to the proposed A27 widening as well.

DEVELOPMENT OPPORTUNITIES WITHIN THE TOWN Q10

- a. The development priority should be brown field sites. Brown field sites are NOT in short supply, whereas green spaces are few relative to the built environment.
- b. Mixed use should definitely include low cost/subsidised/free spaces for community use. c. not known

EDGE of TOWN DEVELOPMENT OPPORTUNITIES Q11

- a. None should be developed until brown field sites are exhausted. This will require more initial outlay, but the benefits to everyone of keeping green spaces will outweigh the additional short term costs.
- b. Subject to a.) above such sites should be developed for long term cost effectiveness. ie good quality sustainable materials, design to integrate buildings with the landscape. Priority should be given to local residents and green sites, if used, should NOT be developed to attract new residents from out of town. Green sites if developed should be used to provide homes for people needing housing who already living in Worthing.
- c. Yes, plant more trees, maintain access for leisure use, perhaps allow a volunteer community group to keep an eye on them, to keep them litter free and even to enhance them. Consider allowing community groups to grow edible plants and herbs in some areas. Otherwise, leave them alone with minimal maintenance.
- d. Yes, subject to everything written above about infrastructure and environmental considerations and DEVELOP BROWN SITES FIRST.

PLANNING POLICIES Q12

- a. The item starting 'Travellers and travelling show people' should be rephrased positively as follows: 'to consider favourably applications by Gypsies, travellers and travelling show people provided they conform to established and published criteria.'

b. and c. Does low carbon include fracked gas? No mention of energy efficiency. 'Sustainable' design only mentions water, nothing else.

What is an acceptable level of pollution?

Disabled access / facilities are not mentioned and should be.

REFERENCE

Comment number: WIO-M-72

Date received: 21/06/2016

Sarah Nelson <Sarah.Nelson@southdowns.gov.uk>

10:05 (3 minutes ago)

to me

Dear all

Please find attached the comments from the SDNPA. I'm really sorry, as per normal we have not used your form or answered your particular questions! If you need it in another format please let me know.

Best wishes

Sarah

Sarah Nelson
Strategic Planning Lead
South Downs National Park Authority

Tel: 01730 819285
South Downs Centre, North Street, Midhurst, West Sussex, GU29 9DH
www.southdowns.gov.uk | [facebook](#) | [SDNPA twitter](#) | [Ranger twitter](#) | [youtube](#)



21 June 2016

Planning Policy Team
Worthing Borough Council
Portland House
44 Richmond Road
Worthing
BN11 1HS

Dear Sir / Madam

Worthing Borough Local Plan: Issues & Options May 2016

Thank you for consulting the South Downs National Park Authority (SDNPA) on your emerging Local Plan.

As you will be aware the SDNPA has published and consulted on the South Downs Local Plan: Preferred Options. Through the preparation of this plan a set of strategic cross boundary planning issues have been identified by the Authority. These 6 key issues for the National Park, set out below, form the basis of the Authority's comments on the Worthing Local Plan (WLP).

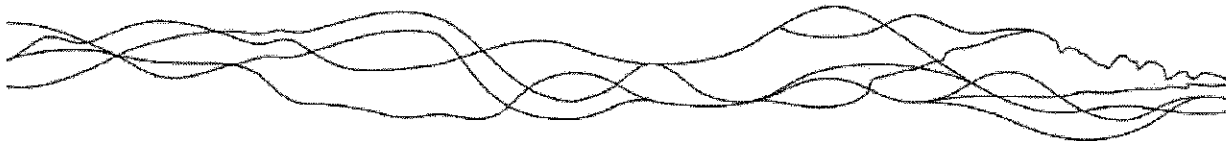
1) Conserving and enhancing the natural beauty of the area.

The SDNPA has noted the references throughout the emerging WLP to the South Downs National Park and welcome the use of the Hankisson Duckett Landscape Capacity Study at such an early stage in the assessment of land that may be available for development. The SDNPA and all relevant authorities including Worthing Borough Council are required to have regard to the dual Purposes and Duties of the South Downs National Park as set out in Section 62 of the Environment Act 1995. In future iterations it is important to set out this duty alongside other matters (such as the NPPF) that the WLP must take into account and we would support the inclusion of a policy specifically relating to the setting of the National Park – to assist we have attached (Appendix 1) an example of one recently agreed between ourselves and Mid Sussex District Council and complies with NPPF para 113 which states that *'Local Planning Authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity or landscape areas will be judged.'* and Section 62 of the Environment Act.

In progressing with the Local Plan you may also wish to consider the SDNP Partnership Management Plan, the State of the Park report which includes the Special Qualities of the SDNP.

Within the context of the National Park, the need to conserve and enhance the natural beauty of the area goes beyond the traditional consideration of landscape character and also includes issues such as tranquility, dark night skies and views. In this regard the SDNPA is now a recognised International Dark Skies Reserve and we would welcome any continuing support that can be given by Worthing through the preparation of its planning policies to ensure this initiative is successful. To assist you, more information is available via our website www.southdowns.gov.uk/enjoy/explore/dark-night-skies/ and our Local Plan: Preferred Options

2) Conserving and enhancing the region's biodiversity (including green infrastructure issues)



We have no further comments to add in relation to the main environmental challenges you have identified.

3) **The delivery of new homes, including affordable homes and pitches for Gypsies and Travellers.**

The level of growth

The SDNPA recognises the development pressures being experienced in Worthing, the limited development opportunities available in and around the town and the likelihood that the Borough will not be able to meet its need for new housing. The National Park has no view on the ability or otherwise of Worthing Borough to increase the delivery of housing and considers that it is a matter for the Examination of the Local Plan to test the evidence. Given these obvious constraints the SDNPA does not expect to be asking Worthing to meet any unmet housing need arising from the South Downs Local Plan.

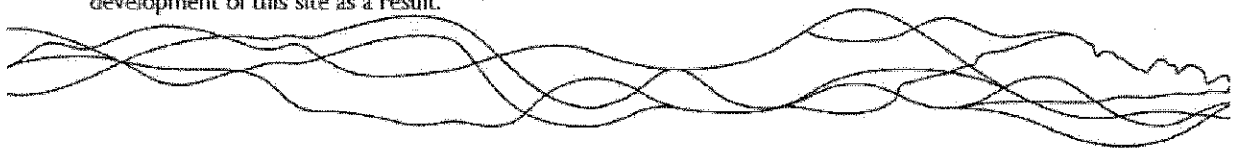
The SDNPA notes that Worthing Borough falls within the Sussex Coast HMA. For your information, the SDNPA is currently preparing a Local Plan for the period to 2032. The Preferred Options consultation concluded in October 2015. A Strategic Housing Market Assessment (SHMA) was prepared in support of the recent consultation and calculated the objectively assessed housing need of between 416 and 454 homes p.a. across the National Park. Through the Local Plan: Preferred Options we recently consulted on achieving 255 homes p.a. (4,596 net additional in total). This was accompanied by a Sustainability Appraisal which concluded that the National Park will not be able to meet its objectively assessed need for housing without significant harm to the special qualities of the National Park, especially its landscape. The delivery of these homes will be strongly influenced by the need to conserve and enhance the natural beauty, wildlife and cultural heritage of the area in accordance with the first purpose of a National Park. Within the Sussex Coast HMA (which includes parts of Adur, Arun, Brighton & Hove, Chichester, Lewes and Worthing) the annual shortfall for the part which lies within the National Park is in the region of 69 - 88 homes p.a. (extract from SDNPA SHMA, 2015, Table 70)

Site Specific Comments

These comments refer to development option sites identified in the options consultation where there are likely impacts on the SDNP. Broadly speaking the Hankisson Duckett Landscape Capacity Study is supported. The relative sensitivities of the greenfield sites appear to be appropriate. Sites 1, 2, 5, & 8 are likely to have impacts on the National Park by virtue of their location and relationship with the SDNP in terms of character and views. In general these issues are well addressed in the study.

Sites 1 & 2 are off Lyons Park on the east side of Worthing and are considered to be sensitive to the SDNP. The relationship between these sites and the adjacent PROW could be made more explicit in the site assessment – this would better reflect the dual purposes of the SDNP. High quality landscape and urban design of any development could potentially enhance the settlement edge in this location.

Site 5 Chatsmore Farm, would be likely to have significant impacts on views to and from the SDNP – including those from Highdown Hill, a noted local visitor destination and accessible area of downland for local residents. Highdown Hill is viewpoint 32 in the SDNP Viewshed Study – a screen print of the panorama photo from this location overlooking the site is included below. This shows the prominence of the site in these views and also shows site 4 on the skyline. Both sites contribute to the Goring/Ferring Gap which is perceivable in views from the SDNP and provides an important visual break to development on the coastal plain. The SDNPA would consider objecting to development of this site as a result.





<http://www.southdowns.gov.uk/viewshed/panoramas/VP31/VP31.html>

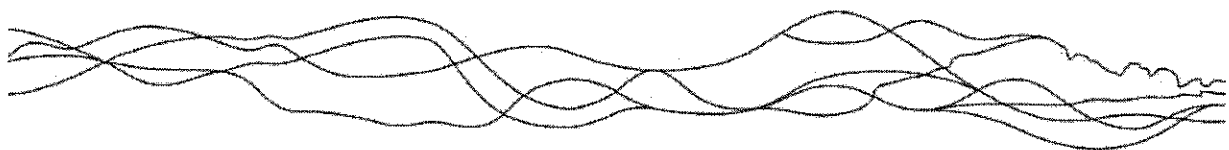
The following is a link to the ZTV for this viewpoint from the SDNP Viewshed Study:

<https://www.southdowns.gov.uk/wp-content/uploads/2015/11/VP31-Highdown-Hill.pdf>

Site 6, Caravan Club, Titnore Way, also known as the Northbrook Farm Caravan Site is an 85 pitch site which provides an excellent location for visitors to both Worthing and the SDNP. The South Downs Visitor Accommodation Review (2014) identifies among many things that there are clear prospects for future growth in the demand for all types of visitor accommodation. The review also highlighted the significant supply of visitor accommodation in the immediate areas bordering the National Park. The SDNPA is keen to work with local authorities to enable opportunities to support the visitor economy in and around the National Park and would be concerned if this large site was to be allocated for residential development. The ability to find an alternative site for such a use in the locality is very limited. Tourism in the National Park is driven substantially by day visitors who spend much less than overnight stayers. Albeit that this site is not within the National Park, its proximity is such that facilities and attractions within the South Downs are likely to benefit from it to a greater extent than it does from merely day visitors. This is likely to be the case for Worthing as well.

Site 8, North West of Durrington, is assessed as partly developable in the Hankisson Duckett Study and in broad terms the potential limit of development on the site is considered acceptable, however the following points need further consideration:

- The Castle Goring conservation area boundary has now been extended to include all of the parkland to the south of Castle Goring, effectively meaning that the western



boundary of site 8 now abuts the Conservation Area boundary for its entire length. This would lead to an assessment of increased sensitivity for this part of the site.

- Zone b within site 8 is identified as having less sensitivity but the site analysis does not include reference to the views from the PROW which runs between zone b & c. These views are towards the SDNP and the Conservation Area and include Highdown Hill and Ancient woodland in the backdrop. It is suggested that these are sensitive views which should be flagged. (see photo below)

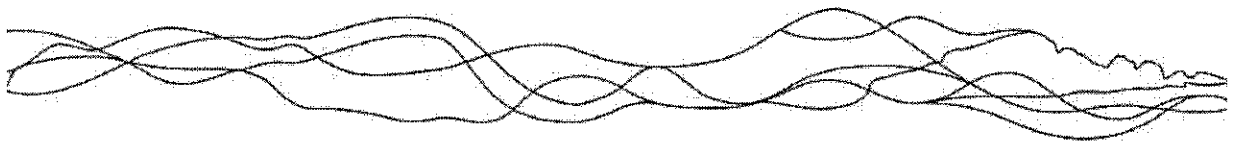


- The new features proposed as part of West Durrington strategic development zone do not appear to have been considered as part of the assessment and how development would affect the permitted open space area along the southern boundary of the site and views towards the Downs and the Castle Goring Estate.
- We support conclusions on this site which find that Zone A is not suitable for development and it is suggested that taking into account the extended conservation area that this area is even more sensitive than the existing assessment allows for. In finding the area unsuitable for development it is suggested that Zone A should be laid out as parkland to complement the setting of the SDNP and Castle Goring. In addition Zone b, if included for development should provide a street structure and GI network which allows for the long distance views identified to the west.

These comments are written on the basis of assessing impacts on the landscape and views of the South Downs National Park Authority only. There may be other landscape and visual impacts which go beyond the scope of this response and should be assessed by the Local Authority Landscape Architect/ Consultant.

4) The promotion of sustainable tourism

The SDNPA supports the recognition of the need to improve links to the National Park, particularly through sustainable modes of transport. Please see our comments on Site 6: Caravan Club, Titmore Way.



5) Improving the efficiency of transport networks by enhancing the proportion of travel by sustainable modes and promoting policies which reduce the need to travel.

In addition to the key challenges already identified (Q7: Transport) it would be good to include reference to making better sustainable transport options out into the SDNP, thereby giving a better experience for locals and visitors which is linked to boosting the local economy and helping to support other health and wellbeing objectives.

6) Development of the rural economy.

This is a key strategic issue for the National Park Authority but not one which is of significance for Worthing Borough. However there may be opportunities for the Borough to consider the allocation of land for small business units to allow residents to work near to home and in response to Q3: Economy, it is agreed that the WLP should continue to protect key employment areas albeit following a review of their role and future viability. The loss of employment sites in Worthing not only affects local residents but also some within the National Park and the ability of the SDNP to identify further employment land is severely constrained.

In response to the more detailed questions set out throughout the consultation document we have the following limited comments:

- Q2: Strategic Objectives – It is suggested the objectives include reference to maximising the positive contribution that the SDNP makes to the quality of life for local residents and that enhancing existing and creating new connections and access between the towns, downs and the sea is a key objective;
- Q12: Planning Policies.
 - Appendix I contains wording recently agreed with Mid Sussex in relation to proposals near to the SDNP which you may find helpful.
 - The visitor economy policy should seek to retain existing visitor facilities and accommodation not just support new.
 - The pollution and contamination policy should include reference to lighting and evidence used in support of the SDNP Dark Nights Skies reserve may be useful to you.

We wish you well with the progression of the District Plan. If you have any queries please do not hesitate to contact me.

Yours faithfully

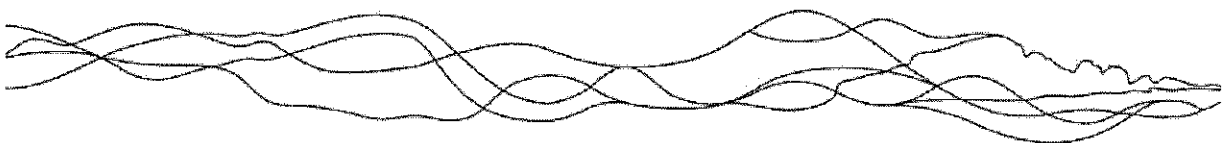


Lucy Howard
Planning Policy Manager
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Enc

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Chief Executive: Trevor Beattie



Appendix 1: Mid Sussex District Plan – Draft Policy DPI6: Setting of the South Downs National Park

The areas of land surrounding the South Downs National Park make a contribution to the setting of the South Downs National Park. The South Downs Integrated Landscape Character Assessment (2011) provides information on the landscape character of the National Park. The Assessment examines the factors that may bring change on the National Park and the adjacent areas. The Assessment identified issues outside the National Park boundaries that can impact on the character of the National Park such as light pollution and increased development and the associated landscape change. Mid Sussex District Council works in partnership with the South Downs National Park Authority to protect and enhance the natural beauty of the National Park.

The South Downs National Park Authority has purposes as specified in the Environment Act 1995. In meeting these purposes there is also a duty to seek to foster the economic and social well-being of the communities within the National Park. The purposes of the National Park are:

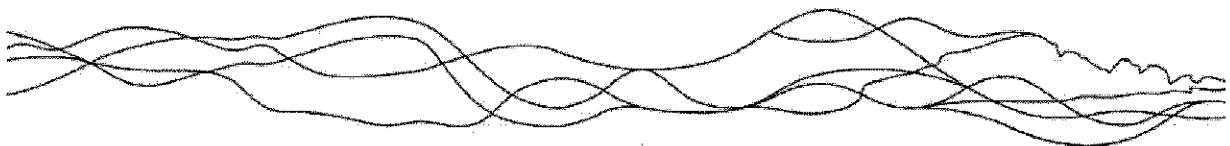
- (i) To conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park area; and
- (ii) To promote opportunities for the understanding and enjoyment of the Park's special qualities by the public.

DPI6: Setting of the South Downs National Park

Evidence Base: The South Downs Partnership Management Plan, South Downs Integrated Landscape Character Assessment, Defra Duty of Regard.

Development within land that contributes to the setting of the South Downs National Park will only be permitted where it does not detract from, or cause detriment to, the visual and special qualities (including dark night skies), tranquillity and essential characteristics of the National Park, and in particular should not adversely affect transitional open green spaces between the site and the boundary of the South Downs National Park, and the views, outlook and aspect, into and out of the National Park by virtue of its location, scale, form or design.

Development should be consistent with National Park purposes and must not significantly harm the National Park or its setting. Assessment of such development proposals will also have regard to the South Downs Partnership Management Plan and emerging National Park Local Plan* and other adopted planning documents and strategies.



REFERENCE

Comment number: WIO-M-73

Date received: 20/06/2016

LocalDevelopment Framework <ldf@arun.gov.uk>

16:37 (19
hours ago)

to me

Hello

Please find below the officer response to this consultation.

Thank you for consulting Arun District Council on your Issues & Options document. After reviewing the document we have the following officer response that will be presented to our Local Plan Sub-Committee on 30th June and then Council for final sign off.

The Council is glad to see that all development opportunities are being investigated through the evidence base for delivering the objective needs of Worthing Borough. Considering the position of need against supply, it will be important for consideration of higher densities and mixes of uses to be investigated. Additionally, an approach that is flexible towards development of larger residential gardens would seem a more pragmatic approach than resisting all developments of this nature. Finally, it will be important for all the evidence to have fully incorporated as much mitigation as possible.

We would wish to be kept informed of developments both in terms of evidence and approach towards the sites against the Borough boundary with Arun District and furthering our respective needs through the Duty to Co-operate.

Kind Regards

Charlotte Hardy | Senior Environmental Assessment Officer, Planning, Arun District Council | Location: First Floor,
Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF

Internal: 37794 | External: +44 (0) 1903 737794 | E-mail: Charlotte.Hardy@arun.gov.uk

Visit Arun's web site at

REFERENCE

Comment number: WIO-M-74

Date received: 20/06/2016

Jane Harrison/GBR <Jane.Harrison@dtz.com>

17:23 (18
hours ago)

to me

Dear Sir / Madam,

Please find attached a representation to the Worthing Local Plan Issues and Options consultation on behalf of our client Royal Mail Group Ltd.

Please keep us informed of future consultation stages of the new Worthing local plan.

Kind regards,

Jane

Jane Harrison
Assistant Consultant – Development Consultancy

Direct: +44(0) 203 296 3207

jane.harrison@cushwake.com

125 Old Broad Street, London EC2N 1AR



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20 June 2016

Dear Sir / Madam

ROYAL MAIL GROUP REPRESENTATIONS:

Worthing Local Plan – Issues and Options Consultation

We are instructed by our client, Royal Mail Group Ltd (Royal Mail), to submit representations to the *Worthing Local Plan – Issues and Options Consultation*.

Background

Royal Mail is the UK's designated Universal Postal Service Provider, supporting customers, businesses and communities across the country. This means it is the only company to have a statutory duty to collect and deliver letters six days a week (and packets five days a week) at an affordable and geographically uniform price to every address in the UK. Royal Mail's services are regulated by Ofcom. It also operates Parcelforce Worldwide which is a parcels carrier.

The United Kingdom letter post business was fully liberalised in January 2006 and Royal Mail operates in a highly competitive market place. Royal Mail is continually seeking to find ways to improve the efficiency of its business, anticipate its customers' needs and respond flexibly to changes in communications technology.

Land use planning is therefore an important issue for Royal Mail with regard to protecting their assets and operations, and in planning future investment across their estate and supporting its infrastructure. On this basis, Royal Mail's involvement in the plan making process and working with Local Planning Authorities to sharpen and influence planning policy is considered critical to the future success of their business and in their continued role as the UK's designated Universal Postal Service Provider.

Worthing Delivery Office and Parking

Royal Mail has a statutory duty to provide efficient mail sorting and delivery services for the District of Worthing. This service is currently provided by Worthing Delivery Office (DO) which is located to the North of the junction of Chapple Road and Union Place. The DO is supported by offsite parking in close proximity to the delivery office. There is very limited onsite parking which is not sufficient to support Royal Mail's operational needs in relation to delivery vehicles and staff parking. As such, Royal Mail have an agreement to use 25 parking spaces in the NCP carpark to the south of Union Place.

Representation

Cushman & Wakefield have reviewed the issues and options consultation version of the emerging *Worthing Local Plan* in the context of its impact on Royal Mail's operations. The key issues are identified below.

Parking

As explained above, Royal Mail has a small amount of onsite parking at their Worthing Delivery Office which is not sufficient to cater for their parking needs and, as such, is significantly supplemented by the use of the NCP carpark to the south of Union Place. The Local Plan Issues and Options Map of Sites allocates the NCP site, 'Union Place South', for comprehensive mixed use redevelopment. This may lead to a loss of this important car parking facility. Careful consideration should be given to ensure businesses operating in the local area, such as Royal Mail, are not adversely affected through a loss of car parking provision. A loss of car parking, without re-provision, would negatively impact upon businesses within Worthing in relation to the requirements of their staff, customers and business operations. As such, we respectfully request that either the policy relating to the redevelopment of this site should ensure there is no loss in car parking provision for public use on the site, or a suitable alternative car park is provided within the locality. A car parking survey should be undertaken by the council to ensure there is sufficient unrestricted on-street parking capacity to fully compensate for the loss of the off-street car parking facility.

Protection of employment uses

The protection of existing operations and amenity is a crucial issue for Royal Mail, particularly where there is potential for sanctions to be placed upon them when uses of a sensitive nature are introduced in close proximity to existing Mail Centres and Delivery Offices. For example, due to the nature of their delivery requirements and targets, Delivery Offices and Mail Centres often operate in sensitive hours in the early mornings and late evenings, generating large volumes of vehicular movements and associated mail sorting and loading activity, all of which result in noise, light and other associated impacts. Such operational amenity implications are not considered to be complementary to residential land uses.

The issue of neighbouring land uses and their compatibility, including potential environmental / amenity impacts is therefore fundamental to Royal Mail, particularly where Local Planning Authorities are assessing the suitability of future land use allocations and development sites. This particular issue is clearly recognised within the National Planning Policy Framework (NPPF) at Paragraphs 123 and 109, which support the protection of existing businesses and their operations. In a similar vein, Paragraph 123 states that planning policies and decisions should aim to recognise that existing businesses wishing to develop in continuance of their business needs should not have unreasonable restrictions placed upon them because of subsequent changes to nearby land uses.

As above, the site directly to the south of the delivery office, 'Union Place South' is allocated for mixed-use redevelopment. It is requested that a robust policy position is adopted by the council to ensure that any sensitive land uses within the redevelopment, such as residential use, do not prejudice the future operations of existing surrounding uses.

Conclusion

Royal Mail would welcome further engagement with Adur and Worthing Council particularly where any such proposals would impact upon parking provision and allocations / sites adjacent to the Delivery Office coming forward for redevelopment.

I trust that these representations are acceptable and I would be grateful if you could acknowledge receipt and keep me informed of future stages of the preparation of the *Worthing Local Plan* and other planning policy documents.

Yours faithfully,

Jane Harrison

Development Consultancy, Cushman & Wakefield

Cc Tony Haines Royal Mail Group
Holly Trotman Royal Mail Group

REFERENCE

Comment number: WIO-M-75

Date received: 21/06/2016

Daniel Ramirez <daniel.ramirez@turley.co.uk>

21 Jun (8
days ago)

to me

Dear Sirs,

We are pleased to have this opportunity to comment on the Worthing Local Plan, Your Town - Your Future (YTYF) consultation document dated May 2016.

Turley is acting on behalf of Persimmon Homes Thames Valley who is promoting the site identified in the document as 'Upper Brighton Road' for residential development.

Please find attached our client's representation to the YTYF Consultation Document, and the following supporting information in relation to the Upper Brighton Road site:

- Site Transport Appraisal, prepared by iTransport
- Landscape and Visual Overview, prepared by CSA Environmental

Should you wish to discuss any of the points raised in our letter or require any further clarification, please do not hesitate to contact us.

We look forward to confirmation of receipt.

Kind Regards,

Daniel Ramirez
Planner

Turley

6th Floor North
2 Charlotte Place
Southampton SO14 0TB
T 02380 724 888
M 07801 079 557
D 02380 724 876

Turley

21 June 2016

Delivered by email and post

Planning Policy Team
Worthing Borough Council
Portland House
44 Richmond Road
Worthing
BN11 1HS

worthinglocalplan@adur-worthing.gov.uk

Dear Sirs

**Representation to Worthing Local Plan – Your Town - Your Future - Consultation Document
May 2016**

We are pleased to have this opportunity to comment on the Worthing Local Plan, Your Town - Your Future (YTYF) consultation document dated May 2016. Turley is acting on behalf of Persimmon Homes Thames Valley who is promoting the site identified in the document as 'Upper Brighton Road' for residential development.

The site is located on the eastern edge of Worthing and comprises two unequal parcels of land located either side of Upper Brighton Road. The site currently lies adjacent, but outside of Worthing's defined settlement boundary and would provide a logical extension to the built-up area. The site is located approximately 2 km from the centre of Worthing and benefits from a number of local services and facilities within walking distance. East Worthing railway station is also located approximately 1.5 km to the south and provides services to Brighton and Portsmouth. Our client has commissioned site assessment and master planning work in order to better understand the opportunities and constraints at the site. We enclose copies of the initial landscape and transport work, which indicate that the site may be capable of accommodating approximately 150 dwellings. This and further technical work will be shared with the Council in due course in order to support either an allocation within the forthcoming plan or an early planning application.

We are pleased to provide our comments on the YTYF consultation, which are set out in the table below.

Section / Question	Comment
Foreword / Introduction	Our client supports the review of the Worthing Local Plan (WLP) and the acknowledgement by the Council that it needs to plan for the future now. However the urgency to secure housing delivery is significant and will require action ahead of the lengthy WLP review process. This position is compounded by the Council's lack of a five

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Registered in England Turley Associates Limited no. 2235257. Registered office: 1 New York Street, Manchester, M1 4ND

	<p>year housing land supply and the out of date housing policies in the WLP. In this context the Council should be looking to release sites ahead of the review process in order to go some way to addressing the urgent housing need. Land at Upper Brighton Road does present the Council with an opportunity to release land early in this process as it is available and deliverable.</p>
<p>Key Challenges</p>	<p>Our client agrees with the key challenges set out in the document and would particularly highlight:</p> <ul style="list-style-type: none"> • the aspiration to deliver growth within a very constrained Borough; and • the wish to ensure that an appropriate mix of development comes forward to respond to needs – for example provision for family housing and not to over rely upon denser urban development. <p>It is considered that these objectives can only be met through the release of a number, if not all of the 'edge of town development opportunities' given the scarcity of potentially developable land within the Borough.</p>
<p>Vision and objectives (Q1-2)</p>	<p>Our client agrees that the future is bright for Worthing, and that the Vision in YTYF is an appropriate one. The town is fortunate in its location and setting, which contribute towards its inherent character. High quality new development in suitable locations has the potential to add to the physical attributes, economy and community well-being of the Borough. Our client believes that the Strategic Objectives under the headings of Community, Economy and Environment are appropriate.</p>
<p>Key Issues (Q8, 9, 10, 11 & 12)</p>	<p>Our client considers that within the Key Issues section a number of factors should be underlined:</p> <p><u>Environmental</u></p> <p>The published Landscape and Ecology Study is just one background document that is topic specific and needs to be seen in the context of other elements of the planning balance. This would include the economy and the need to provide as many decent homes to meet Objectively Assessed Need (OAN) as is reasonable. This should be on suitable sites that are limited in their constraints by flood risk, settlement pattern, ecology or a range of other environmental or technical factors.</p> <p><u>Housing</u></p> <p>The YTYF analysis of why Worthing needs more homes is considered to be a reasonable one and it is helpful to have the OAN set out as this informs the context. The benefits to be brought by more homes are</p>

also reasonably portrayed. The issues and importance expressed around OAN underlines the task ahead for the Council, with some timely and potentially challenging decisions needing to be made. Failing to provide as many suitable homes as reasonably possible is not a matter for procrastination, as it is a fundamental need for all people to have a decent home. The provision of new homes should therefore be included as a development priority.

Development Options within the Town / Areas of Change

Our client has no specific comments on the sites identified, but would make the general point about the recognised difficulties of delivering homes in some of these areas, many of which have been identified for housing delivery for a number of years. On this basis and given the scale of the current OAN, our client would stress the importance of avoiding an overreliance on the housing supply from urban sites. It should also be acknowledged that the urban sites will lend themselves more readily to the delivery of flatted development, rather than family accommodation, which is in significant need. In addition, the Greenfield opportunities that exist generally take less time to deliver much needed homes, which can also bring forward funds for much needed infrastructure across the Borough through the adopted CIL.

Edge of Town Development Opportunities

Setting aside our client's land interest at 'Upper Brighton Road' (Site 3) the document may well identify the appropriate key issues for the other 7 potential sites and it is clear that in some cases the planning difficulties may be very pronounced.

The sub-section fairly points out that the Landscape Study Findings "will need to be balanced with all other evidence to determine the suitability of sites for development", and our client would support this stance.

In terms of Site 3, attached is our client's landscape evidence which clearly shows that, in landscape terms the land to the north of Upper Brighton Road does have some development potential. This is subject to development that is appropriate in scale and sensitively landscaped. We have also attached a Transport Note, which confirms that development of up to 150 dwellings would be acceptable in transport terms. This work supports our client's belief that land at Upper Brighton Road has the potential to provide housing development in the short term at a scale that could assist significantly in the Council's delivery of much needed new homes.

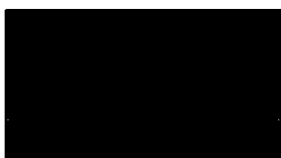
Planning Policies

Our client supports the broad summary of suggested planning policies for the plan, and will make detailed comments on their wording at the Publication stage, to ensure they accord with national planning policy

	and latest guidance.
--	----------------------

We trust the above comments are helpful and look forward to participating in the next stage of the plan. In the meantime should you wish to discuss any of the points raised in our letter or require any further clarification, please do not hesitate to contact us.

Yours sincerely



Associate Director

will.cobley@turley.co.uk

Additional Attachments

- 1- Landscape and Visual Overview --report no CSA/2983/01-Part A
- 2- Landscape and Visual Overview --report no CSA/2983/01-Part B
- 3- Transport Appraisal

REFERENCE

Comment number: WIO-M-76

Date received: 21/06/2016

21 Jun (8
days ago)

[REDACTED]
to me

From Robert Potts [REDACTED]

Dear Sirs,

The new plan does not appear to consider the more rural aspects of the area but leaves the protection to The South Downs national Park Authority, and only seems to concentrate on the town centre and the building plots.

There has recently been discussion in the council chamber about the preservation of the wind corridors around High Salvington windmill which are very important in continuing to operate the mill as "working", (one of very few left in the country) The mill is owned by the Worthing Council and they do not appear to be protecting the adjacent area from development.

The plan must consider all the environments in the area including public parks, gardens and places of special interest and historic note, such as Highdown, Tarring, Beach House and Homefield parks, Field Place etc....

I appreciate that the council must build X number of homes but without a decent environment they will only be slums of the future.

I trust that the council will consider ALL the comments made by the public.

Yours faithfully,
Bob Potts

REFERENCE

Comment number: WIO-M-77

Date received: 21/06/2016

21 Jun (8 days ago)

to me

Comments.

ENVIRONMENT

Question 8b.

Local Plan & competing needs: Liaise with Regulators/other local authorities to agree mutually beneficial decisions regarding developments, should this be legally possible.

Question 8c.

High rise development at or very near sea-front should not be allowed.

HOUSING

Question 9b.

Specialist housing needs in this category would be better met by developing and improving, where possible, sites in communities with necessary amenities/services/schools etc. already in the area.

Adapting a mix of different types of housing in different areas would help to keep intact the character of a particular neighbourhood and mitigate against the disadvantages of major developments.

Question 9c.

Worthing is already the most densely populated area in West Sussex (In 2011 -104,600 = 3220 persons per sq.km) and projected to rise by 22% in 2033 [Office for National Statistics figures]. Compare the population density per sq.km in other areas of West Sussex per ONS 2011 figures e.g. Arun 676, Chichester 145, Mid Sussex 419, Adur 1464, Crawley 2370, Horsham 248)

Therefore any potential developments need to be carefully considered so as not to over-develop this area and its unique environment to the detriment of the present community. A requirement or target to deliver x units of housing should not necessarily lead to the construction of more roads and infrastructure (*more cost*) and the acquiring of even more, scarce land.

Development of the Land North of Beeches Avenue and the adjoining site of Worthing United Football Club would have a huge detrimental impact on Worthing.

The local community, the town of Worthing and its setting and amenities also the South Downs National Park.

A full and comprehensive Environmental Impact Assessment (EIA) would identify the impacts of any housing and commercial development on this area in particular, and any other designated areas under consideration for development. An EIA would lead to a serious and considered decision on any projected development and help to obviate any requirement to build there.

An EIA would identify the impacts, temporary and permanent on the actual specific areas *and* adjacent areas of any developments, including those during any construction phases, such as:

- Increased traffic volumes (Construction phase)
- Increased traffic volumes (Permanent)
- Road Safety
- Ecology (Immediate area and South Downs National Park)
- Aesthetic Views (Worthing Residents, to/from SDNP)
- Recreational amenities
- Local Services (Doctors/Dentists/Schools).

EDGE OF TOWN DEVELOPMENT OPPORTUNITIES.

Question 11a.

The land North of Beeches Avenue and the Worthing United Football Club should be protected from development.

Any development of these sites will deprive not only the local residents of their green spaces and local football club but also the wider community in Worthing. Any building on these sites, because of their elevation, will virtually lock local residents into a claustrophobic concrete jungle with no views. Building here **will** impact detrimentally on the SDNP too. Any buildings **will be highly visible** both from the north (in the SDNP) and from the south. (See also comments in ENVIRONMENT question 9c)

Question 11c.

The sites in question as above in Question 11a should be protected from any development. As Worthing is already the most densely populated part of West Sussex, these sites on North the edge of town should remain protected. The South edge is protected by the sea.

Mr. N. Mitchell, [REDACTED]
[REDACTED]

REFERENCE

Comment number: WIO-M-78

Date received: 21/06/2016

Consultation <Consultation@tetlow-king.co.uk>

21 Jun (8 days ago)

to me, Sue

Please find attached letter and documents in respect of the above.

Regards.

Elaine Elstone

Secretary

TETLOW KING PLANNING

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Planning Policy Team
Worthing Borough Council
Portland House
44 Richmond Road
Worthing
BN11 1HS

Date: 21 June 2016

Our Ref: MR M15/0715-60

By email only:
worthinglocalplan@adur-worthing.gov.uk

Dear Sirs

RE: WORTHING LOCAL PLAN: YOUR PLAN - YOUR FUTURE ISSUES AND OPTIONS CONSULTATION

We represent **Rentplus**, a company providing an innovative affordable housing model aimed at delivering discounted rented homes to buy for people who are unable to acquire a property on the open market.

The Council's decision to review its policies in light of the changing national policy framework is welcomed; our response seeks policies that fully reflect the Government's intention to widen opportunities for home ownership and maximise growth. The constraints within which Worthing Borough is placed makes the drafting of its Plan policies critical to the successful delivery of high quality housing that meets the full breadth of local needs and aspirations. Enclosed with this consultation response is an Affordable Housing Statement setting out the Rentplus model's compliance with the NPPF definition of affordable housing. We ask that this be read, by planning and housing officers, alongside our representation so that the Council's strategic approach to housing delivery takes into account this innovative model.

Q1. Vision

Whilst the Vision is aspirational with an element of pragmatism in its approach to meeting housing and other needs, it would be improved by the following wording:

Limited land resources will have been developed in the most efficient way to maximise the delivery of housing and infrastructure to meet the widest range of identified needs and aspirations, whilst at the same time ensuring that the Borough's intrinsic character and its beach and countryside setting have been protected and enhanced. High quality, affordable new development will have been integrated with existing communities and opportunities taken to deliver new and improved facilities and services.

These amendments would provide a better focus for the Plan, ensuring that the Borough Council and all other stakeholders seek to be ambitious in their approach to delivering housing and other infrastructure in Worthing whilst respecting the Borough's constraints.

Q2. Strategic Objectives

As recognised in the Issues and Options document, Worthing is facing a significant challenge in being able to provide the housing types and tenures to suit the ongoing and high level of needs of the Borough. Affordability is a critical issue, with many households being unable to access housing that adequately addresses their needs or aspirations for home ownership. In light of the changes proposed by the Government to the definition of affordable housing, and in particular the introduction of rent to buy affordable housing, we recommend that any further updates to the housing studies for Worthing specifically include analysis of the contribution that Rentplus homes could make to delivering affordable housing locally. The inclusion at this early stage would help plan for the long term strategic

approach to delivery and also fully understand the whole-Plan viability impacts of the delivery of this model.

As with the Vision, the Strategic Objectives should aim to maximise delivery of affordable housing to meet local needs, but also to meet local aspirations for home ownership. Rentplus can help meet the needs of those households aspiring to home ownership but currently locked out of both affordable and market housing, with a focus on the need to provide 2- and 3-bedroom homes at an affordable price. As set out in the accompanying Affordable Housing Statement, Rentplus homes bridge the gap presented by households not being able to afford a mortgage deposit by enabling them to save while renting at an affordable level. In this way Rentplus extends the opportunity of home ownership to those in Worthing otherwise trapped in expensive private rented accommodation, inappropriately housed in social rented housing or still living with parents. The Strategic Objectives should be amended as below:

- Deliver a range of high quality new homes that best reflect the identified needs and aspirations within the Borough (in terms of size, type and tenure).
- Ensure that developments ~~provide an appropriate level of~~ maximise delivery of affordable housing to help those in housing need.

Q9. Housing

As already noted, the Government has set out its intention to change the definition of affordable housing to include rent to buy. The footnote on page 23 of the Issues and Options document fails to recognise this tenure; the *Proposed Changes to National Planning Policy* consultation in December 2015 explicitly stated (with our emphasis added):

"We propose that the definition will continue to include a range of affordable products for rent and for ownership for households whose needs are not met by the market, but without being unnecessarily constrained by the parameters of products that have been used in the past which risk stifling innovation. This would include products that are analogous to low cost market housing or intermediate rent, such as discount market sales or innovative rent to buy housing. Some of these products may not be subject to 'in perpetuity' restrictions or have recycled subsidy. We also propose to make clearer in policy the requirement to plan for the housing needs of those who aspire to home ownership alongside those whose needs are best met through rented homes, subject as now to the overall viability of individual sites."

Rentplus homes do not rely on Government funding to be delivered, and due to the ready availability of private funding for Rentplus there is significant scope for this tenure to be delivered early in the phasing of sites. This should be fully considered by the Council in relation to developing its new housing and affordable housing policies. We recommend the following be incorporated in the new Local Plan to recognise the importance of rent to buy models which can make a valuable contribution in the Borough:

Affordable housing in the Borough comprises social and affordable rented, intermediate and affordable rent to buy housing. The Council will:

- i. require residential developments on suitable sites to provide affordable housing which is accessible to local people in housing need;*
- ii. state the threshold above which affordable housing is to be sought;*
- iii. state the amount of affordable housing to be provided on suitable sites above the threshold;*
- iv. state the target tenure split between affordable rented, intermediate and affordable Rent to Buy that will be sought;*
- v. allow for the negotiation of points ii-iv where viability is compromised, with the aim of maximising the overall level of affordable housing to be delivered on individual sites.*

The new policy should take into account the reinstatement of the national affordable housing threshold for small sites in the Planning Practice Guidance, which seeks to exclude sites of 10 units or below from providing affordable housing or any tariff-style contributions. The review of the existing Core Strategy policy will need to consider this guidance, and the emerging definition of affordable housing that includes both Starter Homes and rent to buy affordable housing.

Q12. Planning Policies

The list of policies to be included in the Plan includes a policy to meet the national space standards. We note that the space and accessibility standards are optional, and are intended to be adopted only where justified by local needs and evidence that this will not adversely affect the viability of the Plan. The Council should only seek to adopt these standards where robustly justified, and not simply because they are available. We would expect to see a thorough assessment of local need for either.

As already noted in response to Question 9, the Local Plan should include an updated policy (or policies) on the delivery of affordable housing, taking into account the Government's changing definition of this and the need to maximise delivery to meet local needs. As Rentplus homes can improve overall scheme viability, there will need to be a robust viability appraisal of the Plan prior to formal policy consultation. Should the Council consider it useful, a meeting between relevant planning and housing officers and Rentplus would assist in discussing the practical implications of delivering Rentplus homes and the use of a Memorandum of Understanding (MoU) to establish a working relationship to provide affordable homes across Worthing.

We would like to be notified of any other Local Plan consultations, by email only to consultation@tetlow-king.co.uk. Please ensure that Rentplus is retained on the consultation database, with Tetlow King Planning listed as their agents.

Yours faithfully



MEGHAN ROSSITER BSc (Hons.) MSc MRTPI
PRINCIPAL PLANNER
For and On Behalf Of
TETLOW KING PLANNING

Enc.: Affordable Housing Statement (Tetlow King Planning)
Rentplus Briefing Note
Rentplus Model – Compliance (Ashfords)
Rentplus Planning and Policy Review (Aecom)

Cc: Sue Coulson

REFERENCE

Comment number: WIO-M-79

Date received: 21/06/2016

Danny Trussler <DannyTrussler@rabbitgroup.co.uk>

21 Jun (9 days ago)

to me

Dear Sir/Madam,

I attach a copy of your Local Plan Comments Form with my Company's representations and comments, including my Company's Initial Development Proposals Brief for the Decoy Farm site with regard to the Worthing Consultation Document (May 2016).

Should you require any further information from my Company on this matter, please do not hesitate to contact me.

Yours sincerely,

Danny Trussler
Head of Planning, Minerals & Waste

Rabbit Waste Management Ltd
Units 1- 2, 37 Chartwell Road
Lancing Business Park
Lancing
BN15 8TU

tel 01903 762020 | fax 01903 762030

Your Town - Your Future

A new Local Plan for Worthing Consultation Document May 2016 Comments Form

Worthing Borough Council has started work on preparing a new Local Plan which will have a big influence on the town in the period up to 2033. The publication of the 'Your Town - Your Future' consultation document provides the first opportunity to comment on relevant issues and options.

This consultation runs from **11th May to 22nd June 2016**

Website: www.adur-worthing.gov.uk/worthing-local-plan

Email: please email this completed form to worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council,
Portland House, 44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	Danny		
Last name	Trussler		
Organisation (where applicable)	Rabbit Waste Management Ltd.		
Address line 1	Units 1-2		
Address line 2	37 Chartwell Road		
Address line 3	Lancing Business Park		
Postcode	BN15 8TU	Telephone	01903 762020
Email address	dannytrussler@rabbitgroup.co.uk		

You can respond to this consultation online or by email. However, if your preference is to make comments manually this form can be photocopied as many times as necessary.

To keep you informed on progress all respondents will be added to the Worthing Planning Policy consultee database unless you request otherwise.

Use of information: Names and comments we receive will be available for public inspection and may be reported publicly as part of the Local Plan process. Contact details will not be published. Further information about how personal information is processed can be found on the Council's website. Unfortunately we cannot accept or report confidential or anonymous responses. All data will be stored securely in line with the Data Protection Act 1998.

Section B - Comments

The consultation document summarises issues and options within thematic sections. General comments can be inserted in the box below and comments about specific sections of the Plan can be made in response to some key questions that follow.

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VISION

Q1a - Do you agree with the Vision we are aiming and aspiring to achieve?

Yes, we agree with the vision you are aiming and aspiring to achieve in Worthing, particularly with regard to places to live, work and visit.

Q1b - Does it provide a clear direction for the Worthing Local Plan?

Yes, it does provide a clear direction for the Worthing Local Plan, particularly with regard to high quality new development being integrated with existing communities and opportunities taken to deliver new and improved facilities and services.

Q1c - Is there anything you think we have missed which you would like to see incorporated in the Vision?

--

STRATEGIC OBJECTIVES

Q2a - Do you agree with the proposed objectives set out above? If not, what changes would you like to see?

Yes, we agree with the general thrust of the proposed objectives, particularly those relating to the community, economy and the environment.

Q2b - Are the objectives sufficiently distinctive and locally specific?

Yes, we believe that the objectives are sufficiently distinctive and locally specific.

ECONOMY

Q3a - Do you agree with the key challenges identified for the economy? Are any missing?

Yes, we agree with the key challenges identified for the economy, particularly with regard to the key role of the new Local Plan which we also agree is to contribute to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure, for companies such as ours, within the waste management sector.

Q3b - Should the Local Plan continue to protect key employment areas or should it be more flexible in its approach?

We believe that the Local Plan should continue to protect key employment areas.

Q3c - In addition to the sites already identified as having the potential to deliver employment land are there any other sites that could accommodate employment growth?

RETAIL AND THE TOWN CENTRE

Q4a - Have all the key challenges for retail areas and the Worthing town centre been identified, if not what has been missed?

Q4b - Are retail centres functioning well - how can they be improved?

Q4c - How could new development in the town centre enhance the town's identity and attract more visitors?

TOURISM

Q5a - Have the key challenges for tourism been addressed?

Q5b - In what ways can the tourism offer be improved?

COMMUNITY AND LEISURE FACILITIES

Q6a - Do you agree with the main challenges identified in planning for the provision of different infrastructure needs? Are any missing?

Q6b - Do you have suggestions for how the Local Plan could resolve these?

Q6c - Are you aware of any particular community and leisure needs?

TRANSPORT

Q7a - Do you agree with the main challenges identified? Are any missing?

Q7b - Do you have any suggestions for how the Local Plan could better promote sustainable transport?

ENVIRONMENT

Q8a - Do you agree with the main environmental challenges identified? Are any missing?

Q8b - Do you have any suggestions for how the Local Plan could reach a balance between competing needs?

Q8c - Are there any circumstances you consider where regardless of mitigation, development would be inappropriate?

Q8d - What value do you place on the borough's green spaces, particularly those around the town?

HOUSING

Q9a - Should housing delivery be given higher priority than other development needs (e.g. employment land, community facilities)?

Q9b - How should we best address specialist housing needs (e.g. affordable housing; family housing; self-build housing; sheltered & extra care; houses in multiple occupation)?

Q9c- Efficient use of land will help to raise densities and will contribute towards meeting development needs. What potential impacts of this should the Council try to mitigate?

Q9d - Should the Council include a policy that would resist the inappropriate development of residential gardens?

DEVELOPMENT OPTIONS WITHIN THE TOWN

Q10a - Do you agree that the sites listed above provide the most significant redevelopment and regeneration opportunities to deliver housing, employment and leisure uses within the town?

Yes, we agree that the sites listed above, provide the most significant redevelopment and regeneration opportunities to deliver housing, employment and leisure uses within the town.

Q10b - Do you have any particular comments on how any of the identified sites should be developed and for what mix of uses?

With regard to particular comments on how any of the sites should be developed and for what mix of use, I attach a copy of my Company's Development Proposal Brief (July 2013) for the Decoy Farm Site (ie Area of Change no. 8). This Brief was initially submitted by my Company to Adur and Worthing Council in 2013 and again discussed with Planning Officers in January 2016. Our Proposed Development Brief for the Decoy Farm site proposes two scenarios for a waste management facility. Scenario 1 proposes a land take for the whole site (ie 8 hectares) for waste management purposes, whilst Scenario 2 proposes a smaller land take (ie 2 to 4 hectares) for a smaller waste management operation. Further details of how this site could possibly be developed may be seen in the Development Brief.

It is also considered that Policy W3 of The West Sussex Waste Local Plan (April 2014): Location of Built Waste Management Facilities, would support this type of facility in this location.

We believe that our proposals are robust and deliverable and that we would invest heavily over the development period and which would also bring employment for at least 50 additional personnel once completed.

We would also be happy to discuss our proposals further with A&WC's and hope that our proposals may be supported by the Council through the Local Plan process.

Q10c - Are there any other potential development sites within the current built up area that should be assessed?

EDGE OF TOWN DEVELOPMENT OPPORTUNITIES

Q11a - Given the housing needs in the Borough do you have any views as to which of these sites should be developed or protected?

Q11b - If any of these sites (in full or in part) are to be allocated for development do you have any views on how they should be developed?

Q11c - If any of these sites are not allocated for development do you have any views on how they should be protected, enhanced or used?

Q11d - Land West of Fulbeck Avenue (site 7) and Land north of West Durrington (site 8) are already within the Built Up Area boundary. In light of significant housing needs should the Council take a positive approach and look to bring forward these sites in advance of the adoption of the new Local Plan?

PLANNING POLICIES

Q12a - Do you have any views on how any of the listed policies should be worded?

Q12b - Are there any policies missing from the list?

Q12c - Are all of the listed policies required?

Please continue on separate sheets as necessary

Name:	Danny Trussler Head of Planning, Minerals and Waste	Signature	
Date:	21st July 2016		



CREATING ENERGY FROM WASTE

DECOY FARM DEVELOPMENT PROPOSAL BRIEF

Initial Brief Presented to Adur & Worthing Council



JULY 4, 2013

RABBIT GROUP

Units 1-2, 37 Chartwell Road, Lancing Business Park, Lancing, BN15 8TU

01903 762020

04/07/13

Cover Page

Author: Mick Adams

Rabbit Group Initial Development Proposal Brief For The Decoy Farm Site Located In Worthing

Introduction

The Rabbit Group have expressed an interest in the Decoy Farm site located on the East Worthing Industrial Estate. The local authority have a desire to bring this site back into use and the Rabbit Group believe they can tailor a proposal to meet with the local authorities requirements and Core Strategy in this regard.

On 2nd July 2013 a short meeting was held between the two parties in the interest of Rabbit Group further understanding the Local Authorities vision for the site and for the Rabbit Group to give an overview of how they would propose to develop the site.

The Rabbit Groups preference would be to take the site on a freehold basis, however as with the initial proposal remain flexible on all aspects including land take and the potential to include enhancements to public utility within the adjacent vicinity to fit with the local authority's strategy for the immediate environment.

The Rabbit Group are currently tendering for the Adur & Worthing local authority Commercial & Industrial waste disposal contract.

Summary

The following is kept to a brief set of bullet points to summarise the Rabbit Groups position regarding the site and outlines two potential scenarios based on allocated land take;

Scenario 1 - Land Take is Total Site, approximately 8 hectares

- Relocation from Chartwell Road, Lancing Business Park of existing Construction & Demolition Materials Recycling Facility, allowing expansion and improvement to the operating capability of the Group to include a Commercial & Industrial MRF, diversion from landfill of plastics to recycling, onsite baling of cardboard for recycling, IBA to IBAA processing producing a recycled product from IBA produced at the Groups existing 5MW electrical Energy Recovery Facility avoiding the current transportation to Chichester. The facility would also include a Small Traders (ie jobbing builders) Commercial & Industrial waste reception at the MRF; Rabbit have identified there is a demand and need for this type of facility locally, the current closest alternatives being Littlehampton, Hove and Shoreham Port.
- Relocation from Marlborough Business Centre, Lancing Business Park of existing vehicle maintenance and fabrication workshops.
- Relocation of open storage for empty containers from Blenheim Road, Lancing Business Park; Riverbank, Shoreham-by-Sea and Fargro, Littlehampton.
- Relocation and business expansion from Spencer Road, Lancing Business Park of open Plant storage and workshop/office facilities for growing Plant Hire business.
- New Anaerobic Digestion facility for recovery of renewable electrical/heat energy.
- New In Vessel Composting facility for production of composts to BSI PAS100.

Value Adds of Scenario 1

- Consolidation of Rabbit Group activities to one site improving interaction between business units, reducing inter site vehicle movements giving reductions in the Groups overall carbon footprint.
- Contribution to Central Government targets for generation of energy from renewable sources.
- Contribution to Central Government targets to reduce reliance on landfill.
- A broad spectrum of employment opportunities including Managerial, Clerical, Administrative, Skilled and Manual labour requirements.
- Indirect employment of professional, engineering & construction services during development phases.

Scenario 2 - Land Take is approximately 2 to 4 hectares

- Relocation of open storage for empty containers from Blenheim Road, Lancing Business Park; Riverbank, Shoreham-by-Sea and Fargro, Littlehampton.
- Relocation and business expansion from Spencer Road, Lancing Business Park of open Plant storage and workshop/office facilities for growing Plant Hire business.
- New Commercial & Industrial Material Recycling Facility with diversion from landfill of plastics to recycling, onsite baling of cardboard for recycling, IBA to IBAA processing producing a recycled product from IBA produced at the Groups existing 5MW electrical Energy Recovery plant avoiding the current transportation to Chichester
- Small Traders (ie jobbing builders) Commercial & Industrial waste reception at MRF; Rabbit have identified there is a demand and need for this type of facility locally, the current closest alternatives being Littlehampton, Hove and Shoreham Port.
- New Anaerobic Digestion facility for recovery of renewable electrical/heat energy.
- New In Vessel Composting facility for production of composts to BSI PAS100.

Value Adds of Scenario 2

- Contribution to Central Government targets for generation of energy from renewable sources.
- Contribution to Central Government targets to reduce reliance on landfill.
- A reduction in the Groups carbon footprint.
- A broad spectrum of employment opportunities including Managerial, Clerical, Administrative, Skilled and Manual labour requirements.
- Indirect employment of professional, engineering & construction services during development phases.

REFERENCE

Comment number: WIO-M-80

Date received: 22/06/2016

Charlotte Yarker <Charlotte.Yarker@montagu-evans.co.uk>
to me

21 Jun (9 days ago)

Dear Sir or Madam

Please find attached representations made to the Worthing Local Plan on behalf of Stagecoach.

Kind regards

**Charlotte Yarker MRTPI
Associate**

Montagu Evans LLP

5 Bolton Street, London W1J 8BA

Direct: 020 7312 7532 [REDACTED] Switchboard: 020 7493 4002

Email: charlotte.yarker@montagu-evans.co.uk

Website: www.montagu-evans.co.uk

Your Town - Your Future

A new Local Plan for Worthing Consultation Document May 2016 Comments Form

Worthing Borough Council has started work on preparing a new Local Plan which will have a big influence on the town in the period up to 2033. The publication of the 'Your Town - Your Future' consultation document provides the first opportunity to comment on relevant issues and options.

This consultation runs from **11th May to 22nd June 2016**

Website: www.adur-worthing.gov.uk/worthing-local-plan

Email: please email this completed form to worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council,
Portland House, 44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	Charlotte		
Last name	Yarker		
Organisation (where applicable)	Montagu Evans LLP on behalf of Stagecoach		
Address line 1	5 Bolton Street		
Address line 2	London		
Address line 3			
Postcode	W1J 8BA	Telephone	020 7312 7532
Email address	charlotte.yarker@montagu-evans.co.uk		

You can respond to this consultation online or by email. However, if your preference is to make comments manually this form can be photocopied as many times as necessary.

To keep you informed on progress all respondents will be added to the Worthing Planning Policy consultee database unless you request otherwise.

Use of information: Names and comments we receive will be available for public inspection and may be reported publicly as part of the Local Plan process. Contact details will not be published. Further information about how personal information is processed can be found on the Council's website. Unfortunately we cannot accept or report confidential or anonymous responses. All data will be stored securely in line with the Data Protection Act 1998.

Section B - Comments

The consultation document summarises issues and options within thematic sections. General comments can be inserted in the box below and comments about specific sections of the Plan can be made in response to some key questions that follow.

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VISION

Q1a - Do you agree with the Vision we are aiming and aspiring to achieve?

Q1b - Does it provide a clear direction for the Worthing Local Plan?

Q1c - Is there anything you think we have missed which you would like to see incorporated in the Vision?

STRATEGIC OBJECTIVES

Q2a - Do you agree with the proposed objectives set out above? If not, what changes would you like to see?

Q2b - Are the objectives sufficiently distinctive and locally specific?

ECONOMY

Q3a - Do you agree with the key challenges identified for the economy? Are any missing?

Q3b - Should the Local Plan continue to protect key employment areas or should it be more flexible in its approach?

Q3c - In addition to the sites already identified as having the potential to deliver employment land are there any other sites that could accommodate employment growth?

RETAIL AND THE TOWN CENTRE

Q4a - Have all the key challenges for retail areas and the Worthing town centre been identified, if not what has been missed?

Q4b - Are retail centres functioning well - how can they be improved?

Q4c - How could new development in the town centre enhance the town's identity and attract more visitors?

TOURISM

Q5a - Have the key challenges for tourism been addressed?

Q5b - In what ways can the tourism offer be improved?

COMMUNITY AND LEISURE FACILITIES

Q6a - Do you agree with the main challenges identified in planning for the provision of different infrastructure needs? Are any missing?

Q6b - Do you have suggestions for how the Local Plan could resolve these?

Q6c - Are you aware of any particular community and leisure needs?

TRANSPORT

Q7a - Do you agree with the main challenges identified? Are any missing?

Q7b - Do you have any suggestions for how the Local Plan could better promote sustainable transport?

ENVIRONMENT

Q8a - Do you agree with the main environmental challenges identified? Are any missing?

Q8b - Do you have any suggestions for how the Local Plan could reach a balance between competing needs?

Q8c - Are there any circumstances you consider where regardless of mitigation, development would be inappropriate?

Q8d - What value do you place on the borough's green spaces, particularly those around the town?

HOUSING

Q9a - Should housing delivery be given higher priority than other development needs (e.g. employment land, community facilities)?

Q9b - How should we best address specialist housing needs (e.g. affordable housing; family housing; self-build housing; sheltered & extra care; houses in multiple occupation)?

Q9c - Efficient use of land will help to raise densities and will contribute towards meeting development needs. What potential impacts of this should the Council try to mitigate?

Q9d - Should the Council include a policy that would resist the inappropriate development of residential gardens?

DEVELOPMENT OPTIONS WITHIN THE TOWN

Q10a - Do you agree that the sites listed above provide the most significant redevelopment and regeneration opportunities to deliver housing, employment and leisure uses within the town?

Stagecoach supports the area of change identified at Marine Parade.

Stagecoach strongly supports the continued identification of the site to deliver a mix of uses on this site in accordance with the adopted Core Strategy Policy 2, which refers to the site as Area of Change 2.

Q10b - Do you have any particular comments on how any of the identified sites should be developed and for what mix of uses?

There are a number of considerations that will determine the quantum of development and mix of uses that can be accommodated on the site. Therefore, Stagecoach requests that a flexible approach is adopted by the Council regarding the amount and mix of uses that can be accommodated on the site.

Q10c - Are there any other potential development sites within the current built up area that should be assessed?

EDGE OF TOWN DEVELOPMENT OPPORTUNITIES

Q11a - Given the housing needs in the Borough do you have any views as to which of these sites should be developed or protected?

Q11b - If any of these sites (in full or in part) are to be allocated for development do you have any views on how they should be developed?

Q11c - If any of these sites are not allocated for development do you have any views on how they should be protected, enhanced or used?

Q11d - Land West of Fulbeck Avenue (site 7) and Land north of West Durrington (site 8) are already within the Built Up Area boundary. In light of significant housing needs should the Council take a positive approach and look to bring forward these sites in advance of the adoption of the

new Local Plan?

PLANNING POLICIES

Q12a - Do you have any views on how any of the listed policies should be worded?

Any policy that applies to the Stagecoach site at Marine Parade should be flexible in terms of the quantum and mix of uses that the site is capable of delivering. This is owing to the detailed consideration that is required in order to ascertain the capacity of the site and the quantum and mix of uses that may be deliverable.

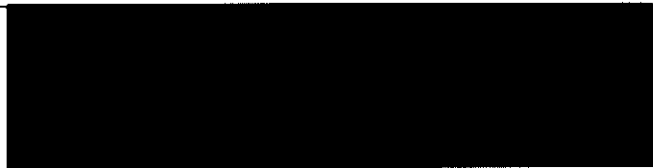
Q12b - Are there any policies missing from the list?

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Q12c - Are all of the listed policies required?

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Please continue on separate sheets as necessary

Name:	Montagu Evans LLP on behalf of Stagecoach	Signature	
Date:	21/06/2016		

REFERENCE

Comment number: WIO-M-81

Date received: 22/06/2016

Rebecca Hoad <RHoad@eceplanning.com>

22 Jun (8 days ago)

to me, Sam, Chris

To whom it may concern,

Please find attached our comments form for the 'new Local Plan for Worthing'.

I would be grateful if someone could acknowledge receipt of this email.

If you have any queries, please do not hesitate to contact us.

Kind Regards

Rebecca Hoad

Planning Technician

ECE Planning



Office Use only

Comment number:

Date received:

Your Town - Your Future

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Website: www.adur-worthing.gov.uk/worthing-local-plan

Email: please email this completed form to worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council,
Portland House, 44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	Chris		
Last name	Barker		
Organisation (where applicable)	ECE Planning		
Address line 1	11 Goring Road		
Address line 2	Worthing		
Address line 3			
Postcode	BN12 4AP	Telephone	
Email address	CBarker@ECEPlanning.com		

You can respond to this consultation online or by email. However, if your preference is to make comments manually this form can be photocopied as many times as necessary.

To keep you informed on progress all respondents will be added to the Worthing Planning Policy consultee database unless you request otherwise.

Use of information: Names and comments we receive will be available for public inspection and may be reported publicly as part of the Local Plan process. Contact details will not be published. Further information about how personal information is processed can be found on the Council's website. Unfortunately we cannot accept or report confidential or anonymous responses. All data will be stored securely in line with the Data Protection Act 1998.

Section B - Comments

The consultation document summarises issues and options within thematic sections. General comments can be inserted in the box below and comments about specific sections of the Plan can be made in response to some key questions that follow.

A number of background evidence documents and studies are out of date as noted within the Issues and Options document. These require updating for decisions on the Local Plan to be based on up-to-date evidence. The following are considered to be priority documents that require updating:

- Strategic Flood Risk Assessment
- Infrastructure Delivery Plan
- Transport Assessment

VISION

Q1a - Do you agree with the Vision we are aiming and aspiring to achieve?

We consider that the vision should be more positive about meeting development needs. We suggest the Vision is redrafted to reflect the provisions of the NPPF to meet all identified development needs in full.

Q1b - Does it provide a clear direction for the Worthing Local Plan?

Q1c - Is there anything you think we have missed which you would like to see incorporated in the Vision?

STRATEGIC OBJECTIVES

Q2a - Do you agree with the proposed objectives set out above? If not, what changes would you like to see?

Under COMMUNITY, we would suggest that the first bullet point is redrafted to reflect the requirements of the NPPF to meet all identified development needs in full.

With regard to the ECONOMY section, we would request that more flexibility is offered with regards to the release of employment land that is no longer considered viable. We would therefore suggest the following amendment to the first bullet point:

Retain and enhance key employment areas and to provide a choice of employment sites to meet the needs of existing and future businesses.

As noted within the Economy Research and Employment Land Review, not all employment sites are fit for purpose and therefore a blanket retention approach would not be considered to be an evidenced based approach.

With reference to gateway locations, these must be clearly stated and identified within the Local Plan for the avoidance of doubt.

Reference to 'enhanced infrastructure' is vague. A clear statement of what infrastructure investment is planned and where would be welcomed.

Lastly, the ECONOMY section must recognise the important role that the provision of new housing (and having a diverse range and active housing market) plays in promoting growth within an area. Creating a diverse and flexible housing market is important in creating liveable and attractive places where employees and employers wish to live and work. Furthermore, the construction industry itself supports jobs and businesses, many of which are located within the Worthing area.

With respect to the ENVIRONMENT category, the objectives should include making Worthing an appropriately compact (and therefore) more sustainable town. This includes maximising the potential of brownfield land. The third bullet should be reworded to be much more positive. Suggested wording is set out below.

Make full and efficient use ~~Maximise the development potential of previously developed land in recognition of the environmental and physical constraints to development posed by the sea and the South Downs and the important green gaps surrounding the town.~~

Q2b - Are the objectives sufficiently distinctive and locally specific?

See comment above.

ECONOMY

Q3a - Do you agree with the key challenges identified for the economy? Are any missing?

Q3b - Should the Local Plan continue to protect key employment areas or should it be more flexible in its approach?

The Local Plan must be much more flexible in its approach to employment sites. It should not protect all employment uses but focus on protecting just those **higher quality** employment sites. The requirements of the Core Strategy (2011) as currently drafted in retaining employment uses outside of protected employment sites is too stringent. This element of the policy should be removed to ensure much greater flexibility.

Q3c - In addition to the sites already identified as having the potential to deliver employment land are there any other sites that could accommodate employment growth?

RETAIL AND THE TOWN CENTRE

Q4a - Have all the key challenges for retail areas and the Worthing town centre been identified, if not what has been missed?

Q4b - Are retail centres functioning well - how can they be improved?

Q4c - How could new development in the town centre enhance the town's identity and attract more visitors?

TOURISM

Q5a - Have the key challenges for tourism been addressed?

Q5b - In what ways can the tourism offer be improved?

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COMMUNITY AND LEISURE FACILITIES

Q6a - Do you agree with the main challenges identified in planning for the provision of different infrastructure needs? Are any missing?
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Q6b - Do you have suggestions for how the Local Plan could resolve these?

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Q6c - Are you aware of any particular community and leisure needs?
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TRANSPORT

Q7a - Do you agree with the main challenges identified? Are any missing?
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Q7b - Do you have any suggestions for how the Local Plan could better promote sustainable transport?
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ENVIRONMENT

Q8a - Do you agree with the main environmental challenges identified? Are any missing?
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Q8b - Do you have any suggestions for how the Local Plan could reach a balance between competing needs?

The Local Plan should seek to deliver a denser form of development in the Borough. This is particularly important in and around the town centre and other centres within the Borough where sustainable transport nodes, key services and local facilities are located.
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The Council should also consider allocating sites suitable for taller development or identifying tall building corridors or areas. The Local Plan needs to be more positive about opportunities for taller and therefore denser buildings within the Borough. This is essential to ensure the Borough meets its development needs.
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Q8c - Are there any circumstances you consider where regardless of mitigation, development would be inappropriate?
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Q8d - What value do you place on the borough's green spaces, particularly those around the town?
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HOUSING

Q9a - Should housing delivery be given higher priority than other development needs (e.g. employment land, community facilities)?

The demand is clearly highest for housing. As such, and given the positive impact that increasing housing provision can have on the local economy, we would argue that housing must be given a higher priority than other development needs.
--

Q9b - How should we best address specialist housing needs (e.g. affordable housing, family housing, self-build housing, sheltered & extra care, houses in multiple occupation)?

Q9c- Efficient use of land will help to raise densities and will contribute towards meeting development needs. What potential impacts of this should the Council try to mitigate?

This is the most suitable, efficient and sustainable way to meet the full objectively assessed housing need as set out in the NPPF. It is our view that the Council should identify all potential sites for taller buildings and allocate suitable sites and / or corridors. Potential impacts should be mitigated ensuring appropriate design policy and through upfront infrastructure planning to ensure no impact on future provision.

It is our view the SHLAA has thus far provided a very conservative view of development potential within the Borough. Given the provisions of the NPPG, the SHLAA should be reviewed accordingly to seek to meet in full the housing needs of the Borough.

Q9d - Should the Council include a policy that would resist the inappropriate development of residential gardens?

This is a very loaded question. It is our view that the Council should not resist development of residential gardens as a matter of course. There are instances when development (i.e. residential development) on garden land can provide for much needed homes with minimal impact. In these instances development should be allowed. It is not clear what 'inappropriate' development refers to. There is no explanation within the text. It is unclear what the evidence base for supporting such a 'key issue' is and why garden land should be protected in the first instance. Further clarification and a robust evidence base for where such a policy is required and is certainly needed for the next round of consultation on the Local Plan.

The table below provides a clear indication of the importance of windfall sites to housing delivery in Worthing as well as the poor delivery rates on Areas of Change sites. The importance of windfall sites (of which gardens make a proportion) is clear.

Year	Units Delivered on Area of Change / Allocated Sites	Total Units Delivered Within Worthing (Net)	Proportion of Units Delivered on Windfall Sites
2011 / 12	0 (0/0)	143	100%
2012 / 13	0 (0/0)	172	100%
2013 / 14	84 (84/0)	245	66%
2014 / 15	133 (133/0)	351	62%
Total	217	911	76%

DEVELOPMENT OPTIONS WITHIN THE TOWN

Q10a - Do you agree that the sites listed above provide the most significant redevelopment and regeneration opportunities to deliver housing, employment and leisure uses within the town?

Area of Change One: Aquarena – this should read 'residential – led, mixed use development site'. Furthermore, the table should refer to the significant potential public benefits of development on this site.

Q10b - Do you have any particular comments on how any of the identified sites should be developed and for what mix of uses?

We do not consider that the Areas of Change policies provide the best approach to development delivery and strongly suggest that site allocations are included within the Plan.

Without the inclusion of allocated sites the Plan cannot be said to be compliant with the NPPF which clearly requires Local Authorities to allocate sufficient land to meet development needs.

The Areas of Change sites have thus far failed to deliver any meaningful amount of development

within the Borough and it is our view that a far more detailed and considered approach by the Council is required.

Q10c - Are there any other potential development sites within the current built up area that should be assessed?

EDGE OF TOWN DEVELOPMENT OPPORTUNITIES

Q11a - Given the housing needs in the Borough do you have any views as to which of these sites should be developed or protected?

Q11b - If any of these sites (in full or in part) are to be allocated for development do you have any views on how they should be developed?

Q11c - If any of these sites are not allocated for development do you have any views on how they should be protected, enhanced or used?

Q11d - Land West of Fulbeck Avenue (site 7) and Land north of West Durrington (site 8) are already within the Built Up Area boundary. In light of significant housing needs should the Council take a positive approach and look to bring forward these sites in advance of the adoption of the new Local Plan?

PLANNING POLICIES

Q12a - Do you have any views on how any of the listed policies should be worded?

The Local Plan must be much more flexible in its approach to employment sites. It should not protect all employment uses but focus on protecting just those **higher quality** employment sites. The requirements of the Core Strategy (2011) as currently drafted in retaining employment uses outside of protected employment sites is too stringent. This element of the policy should be removed to ensure much greater flexibility.

Q12b - Are there any policies missing from the list?

Allocations of land for development (instead of Areas of Change).
Tall Buildings Policy.

Q12c - Are all of the listed policies required?

Protecting and enhancing existing employment sites.

Please continue on separate sheets as necessary

Name:	Chris Barker	Signature	Chris Barker
Date:	21/06/2016		

REFERENCE

Comment number: WIO-M-82

Date received: 22/06/2016

Caroline West <Caroline.West@westsussex.gov.uk>

22 Jun (8 days ago)

to me

Dear Sir/Madam

Thank you for the opportunity to comment on the Worthing Local Plan Issues and Options consultation. Please find attached officer level comments from West Sussex County Council to the consultation.

Kind regards

Caroline West

Caroline West MSc MRTPI | Principal Planner, Planning and Transport Policy Team,
Strategic Planning Business Unit, Economy Planning and Place Directorate, West Sussex
County Council

Location: Ground Floor, Northleigh

Internal: 25225 | External: 03302 225225 | E-mail: caroline.west@westsussex.gov.uk

Worthing Borough Council Local Plan Consultation **West Sussex County Council Officer Level Response**

The draft Local Plan 'Your Town – Your Future' identifies key challenges and the options that could help address them and sets out how the Borough Council will move forward to plan for future of the Borough to 2033. The County Council welcomes the positive approach to considering how best to balance the delivery of growth and regeneration across the borough to meet future needs whilst protecting what is valued about the town and surrounding area. Further work is required in the preparation of the strategy and accompanying evidence base, including identifying the necessary infrastructure and transport mitigation package alongside the allocation of sites and preparation of planning policies.

As well as strategic policies, the Local Plan will include policies to cover many land uses including homes, businesses, retail, transport, community facilities and green infrastructure in order to address the needs of the District. The draft Local Plan does not set a housing target for the Borough of Worthing at this stage, but sets out the evidence to-date regarding the objectively assessed housing need. Worthing Borough Council is intending to set a housing target for the Borough once a review of the balance of housing need, alongside other evidence, has been undertaken in order to assess what level of housing can be delivered in a sustainable manner when taking significant environmental and land availability constraints into account. Comments received, alongside other evidence, will be given consideration when decisions are made on which sites will be proposed for allocation and which policies are produced.

This note sets out West Sussex County Council's officer response to the consultation on the draft Local Plan. It highlights key issues and suggested changes to which Worthing Borough Council is requested to give consideration. The 'general' section contains comments on cross-cutting issues or subjects. These are followed by specific comments, which have subheadings corresponding to the Local Plan sections.

General

In relation to its own statutory functions, the County Council expects local planning authorities preparing local plans and parish councils preparing neighbourhood plans to take due account of its policy documents and their supporting sustainability appraisals. These documents include the West Sussex Waste Local Plan, Minerals Local Plan and West Sussex Transport Plan. It is also recommended that published County Council service plans, for example Planning School Places and West Sussex Rights of Way Improvement Plan, are also taken into account in the preparation of the Local Plan. Infrastructure capacity, for example in schools, and the mitigation that would be needed as a result of development, is a key consideration when allocating development sites.

Minerals - A steady and adequate supply of minerals and the achievement of sustainable waste management can help to achieve a District or Borough Council's goals in relation to the economy, housing, transport, communications, strategic infrastructure and the environment. Therefore, District and Borough Local Plans should recognise the importance of minerals and waste issues as relevant to the scope of their overall strategies.

The National Planning Policy Framework requires that Local Planning Authorities have regard to the need to protect mineral resources from sterilisation. The mechanism for such protection is the designation of Mineral Safeguarding Areas. West Sussex County Council will, through the Joint Minerals Local Plan, set out the formal approach to Minerals Safeguarding (MSAs). The draft West Sussex Joint Minerals Local Plan (April, 2014) identifies draft Mineral Safeguarding Areas which do not include Worthing Borough. However, if there are any changes to the Mineral Safeguarding Areas during the preparation of the Joint Minerals Local Plan, these should be reflected in the Worthing Local Plan to ensure effective consultation between Worthing Borough Council and the Mineral Planning Authority. This would include making reference to the principle of mineral safeguarding, the purpose of MSAs and the likely extent within the Worthing Local Plan and when allocated, will be added to the Proposals Map. This will ensure that minerals are not sterilised by non-mineral developments and encourage the potential need for prior extraction. The Planning & Transport Policy Team can provide further assistance with the wording of a reference to MSAs.

Waste - Policy W2 of the West Sussex Waste Local Plan requires the safeguarding of existing waste sites / infrastructure from other (non waste) development which may prevent or prejudice their continued operation for such purposes. The implementation of W2 requires cooperation between West Sussex County Council and the local planning authorities. Applications for any development at, adjacent or proximal to existing waste sites / infrastructure should be the subject of consultation with West Sussex County Council.

Vision

West Sussex County Council considers that the vision should include reference to the town enhancing its sustainability and ensuring ease of access to its recognised beach and countryside setting. Considering comments on other sections of the document, related to the importance of the wider area on the Borough of Worthing for the economy, tourism and recreation, it is considered how the town links and moves forward positively with the wider area, could also be incorporated within the vision.

Strategic Objectives

Under 'Community' is the objective to safeguard family homes and reference to the delivery of affordable homes. As recognised later in the document, Worthing is an area of an increasingly older population, therefore reference to smaller properties and those that can be adapted, in order to enable people to live independently for longer, would also be supported.

Under 'Environment' it is suggested that access to green spaces within the town and outside is also incorporated.

Retail and Worthing Town Centre

When considering the network of centres and how to best meet the current and future needs across the town, ease of access and sustainable travel options should be considered and incorporated for all users.

Tourism

This is the only section which recognises the links to the South Downs National Park (SDNP) to the north of the Borough and the importance this area plays to the Borough. It is considered that access to this area should also be considered elsewhere in the document, as it is also important for the resident community of Worthing to have clear, sustainable and safe access links into the wider area including the SDNP.

The location of the town, in order for people to access wider tourism facilities and places of interest within and outside West Sussex, could be incorporated within this section. Recognising the importance of the wider area and the role Worthing can play in tourism in West Sussex and beyond.

Community and Leisure Facilities

West Sussex County Council will continue to work with Worthing Borough Council through the preparation of the Local Plan, in order to ensure that the necessary infrastructure and mitigation is set out in order to meet the needs of proposed development.

Transport

The County Council supports the intention of the Borough Council to undertake a Transport Study, in consultation with West Sussex County Council and Highways England, in order to test strategic impacts of proposed site allocations across the Borough and examine how impacts could be mitigated. The transport evidence base for the Local Plan will need to comply with the National Planning Practice Guidance on transport evidence bases in plan making and decision taking.

Evidence will need to ensure that development scenarios, with mitigation, provide confidence that the package of local transport infrastructure improvements and smarter choices measures (or a similar package of measures) is likely to provide sufficient mitigation so that any residual cumulative impacts would not be severe. This is the key test imposed by the National Planning Policy Framework (NPPF).

A new strategic transport model is currently being developed by Highways England representing the Worthing, Adur and Arun areas which is due for completion later this year. It is agreed by the Planning and Highways authorities that the Worthing Local Plan transport evidence base study should be undertaken using the new model, which will place it on a common technical base with Highways England's investigation of major improvements to the A27 through Worthing and Lancing.

When thinking about 'what the local plan must do' there should be a focus on safe and suitable transport infrastructure, which meets the needs of the community, all modes of transport and mitigates against the effects of development.

Housing section, Development Options within the Town and Edge of Town

When considering the Borough housing requirement and proposed development sites, the delivery of the necessary infrastructure should be a key consideration. Safe and sustainable links across the Borough and into the wider area, including

the South Downs National Park, should be considered within the Plan with a range of measures including grade separation to provide access for non-motorised users, if appropriate, in order to reduce severance. West Sussex County Council will continue to work with Worthing Borough Council through the preparation of the Local Plan considering proposed sites for allocation and advising on the infrastructure requirements from proposed development, flooding (considering our duties as the Lead Local Flood Authority having an oversight for all flood actions in West Sussex), as well as on the transport evidence base which will consider the mitigation of development. West Sussex County Council can also assist in the consideration of the needs for the increasing older population in the Borough and how best to plan for the needs of older people through the preparation of the Local Plan.

Policies

West Sussex County Council supports the preparation of detailed Development Management policies and would support inclusion in the 'delivering infrastructure' policy of the requirement for timely delivery of infrastructure to mitigate the impacts of development. We would also support a requirement to protect and enhance the network of Public Rights of Way across the Borough, including the provision of new links within the borough and to the wider area including the SDNP.

Depending on the location and type of proposed development a new transport and connectivity route or community facility may be required. Therefore, ensuring that the relevant policies support the delivery of new routes and community facilities, not just improvements, would be supported.

West Sussex County Council
June 2016

REFERENCE

Comment number: WIO-M-83

Date received: 22/06/2016

Doug Cramond <dcramond@dcpltd.co.uk>

22 Jun (8
days ago)

to me

Please see attached comments on behalf of the West Durrington Northern Sector Consortium....

Doug Cramond
DC Planning Ltd

01202 773080 T

dcramond@dcpltd.co.uk

Your Town - Your Future

**A new Local Plan for Worthing
Consultation Document May 2016
Comments Form**

Worthing Borough Council has started work on preparing a new Local Plan which will have a big influence on the town in the period up to 2033. The publication of the 'Your Town - Your Future' consultation document provides the first opportunity to comment on relevant issues and options.

This consultation runs from **11th May to 22nd June 2016**

Website: www.adur-worthing.gov.uk/worthing-local-plan

Email: please email this completed form to worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council,
Portland House, 44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	Doug		
Last name	Cramond – DC Planning Ltd		
Organisation (where applicable)	for: West Durrington Northern Sector Consortium		
Address line 1	c/o The Studio		
Address line 2	39 Twemlow Ave		
Address line 3	Poole		
Postcode	BH14 8AL	Telephone	01202 773080
Email address	dcramond@dcpltd.co.uk		

You can respond to this consultation online or by email. However, if your preference is to make comments manually this form can be photocopied as many times as necessary.

To keep you informed on progress all respondents will be added to the Worthing Planning Policy consultee database unless you request otherwise.

Use of information: Names and comments we receive will be available for public inspection and may be reported publicly as part of the Local Plan process. Contact details will not be published. Further information about how personal information is processed can be found on the Council's website. Unfortunately we cannot accept or report confidential or anonymous responses. All data will be stored securely in line with the Data Protection Act 1998.

Section B - Comments

The consultation document summarises issues and options within thematic sections. General comments can be inserted in the box below and comments about specific sections of the Plan can be made in response to some key questions that follow.

Forward / Introduction

For the reasons given in the YTYF document the Council is right to review the WLP. However the urgency to secure housing delivery is greater than the lengthy WLP review process would permit. Housing supply policies in the present Core Strategy are out of date in the absence of a five year supply of deliverable housing sites (NPPF para 49) following work on Objectively Assessed Housing Need (OAN).

Key Challenges

The Consortium would agree with the key challenges and would particularly highlight:

- the aspiration to deliver growth within a very constrained Borough; and
- the wish to ensure that an appropriate mix of development comes forward to respond to needs – for example provision for family housing and not over reliance upon denser urban development.

VISION

Q1a - Do you agree with the Vision we are aiming and aspiring to achieve?

It is agreed that the future is bright for Worthing – the Vision in YTYF is an appropriate one – the town is fortunate in its location and setting. It has inherent character and high quality new development in suitable locations will only add to the physical attributes, economy and community well-being.

Q1b - Does it provide a clear direction for the Worthing Local Plan?

Q1c - Is there anything you think we have missed which you would like to see incorporated in the Vision?

STRATEGIC OBJECTIVES

Q2a - Do you agree with the proposed objectives set out above? If not, what changes would you like to see?

The Strategic Objectives under the headings of Community, Economy and Environment are entirely reasonable.

Q2b - Are the objectives sufficiently distinctive and locally specific?

ECONOMY

Q3a - Do you agree with the key challenges identified for the economy? Are any missing?

Q3b - Should the Local Plan continue to protect key employment areas or should it be more flexible in its approach?

Q3c - In addition to the sites already identified as having the potential to deliver employment land are there any other sites that could accommodate employment growth?

RETAIL AND THE TOWN CENTRE

Q4a - Have all the key challenges for retail areas and the Worthing town centre been identified, if not what has been missed?

Q4b - Are retail centres functioning well - how can they be improved?

Q4c - How could new development in the town centre enhance the town's identity and attract more visitors?

TOURISM

Q5a - Have the key challenges for tourism been addressed?

Q5b - In what ways can the tourism offer be improved?

COMMUNITY AND LEISURE FACILITIES

Q6a - Do you agree with the main challenges identified in planning for the provision of different infrastructure needs? Are any missing?

Q6b - Do you have suggestions for how the Local Plan could resolve these?

Q6c - Are you aware of any particular community and leisure needs?

TRANSPORT

Q7a - Do you agree with the main challenges identified? Are any missing?

Q7b - Do you have any suggestions for how the Local Plan could better promote sustainable transport?

ENVIRONMENT

Q8a - Do you agree with the main environmental challenges identified? Are any missing?

The Consortium would underline that the published Landscape and Ecology Study is just one background document which is topic specific and needs to be seen in the context of other elements of the planning balance. This would include the economy and the need to provide as many decent homes to meet OAN as is reasonable. This should be on suitable sites which are limited in their constraints by flood risk, settlement pattern, ecology or a range of other environmental or technical factors.

Q8b - Do you have any suggestions for how the Local Plan could reach a balance between competing needs?

Q8c - Are there any circumstances you consider where regardless of mitigation, development would be inappropriate?

Q8d - What value do you place on the borough's green spaces, particularly those around the town?

HOUSING

Q9a - Should housing delivery be given higher priority than other development needs (e.g. employment land, community facilities)?

The YTYF analysis of why Worthing needs more homes is a fair one and it is helpful to have the OAN set out and a context laid. The benefits to be brought by more homes are also reasonably portrayed. The issues and importance expressed around OAN underlines the task ahead for the Council; some timely and potentially challenging decisions will need to be made. Failing to provide as many suitable homes as reasonably possible is not a matter for procrastination. As it is a fundamental need for all people to have a decent home, the provision of these should be a development priority in answer to this question 9a.

Q9b - How should we best address specialist housing needs (e.g. affordable housing; family housing; self-build housing; sheltered & extra care; houses in multiple occupation)?

Q9c - Efficient use of land will help to raise densities and will contribute towards meeting development needs. What potential impacts of this should the Council try to mitigate?

Q9d - Should the Council include a policy that would resist the inappropriate development of residential gardens?

DEVELOPMENT OPTIONS WITHIN THE TOWN

Q10a - Do you agree that the sites listed above provide the most significant redevelopment and regeneration opportunities to deliver housing, employment and leisure uses within the town?

The Consortium would make no comment on site identification. It would however point to the proven and recognised difficulties of delivering homes on some of these long identified areas. It would reiterate that there must be no over-reliance on housing supply from urban sites and that when or if such sites do eventually deliver this will generally provide flatted rather than family accommodation.

Q10b - Do you have any particular comments on how any of the identified sites should be developed and for what mix of uses?

Q10c - Are there any other potential development sites within the current built up area that should be assessed?

EDGE OF TOWN DEVELOPMENT OPPORTUNITIES

Q11a - Given the housing needs in the Borough do you have any views as to which of these sites should be developed or protected?

Setting aside the Consortium's land at North of West Durrington (YTYF No 8 of 8) the document may well identify the appropriate key issues for the other 7 potential sites but it is abundantly clear that planning difficulties are very pronounced in some cases.

Q11b - If any of these sites (in full or in part) are to be allocated for development do you have any views on how they should be developed?

The sub-section fairly points out that the Landscape Study Findings "will need to be balanced with all other evidence to determine the suitability of sites for development". The Consortium would support that stance.

In terms of Site 8, the Consortium will be supplying evidence which will show that the Study's findings on the potential difficulties of the western section are in any event resolvable through suitable mitigation and sympathetic layout. The merits of this WDNS site ("PFDA" in the adopted LP) have been set out comprehensively in previous submissions; the wider 2011 EIA has covered the area; and (unusually for the 8 sites) it lies within the defined Built Up Area Boundary (BUAB).

Q11c - If any of these sites are not allocated for development do you have any views on how they should be protected, enhanced or used?

Q11d - Land West of Fulbeck Avenue (site 7) and Land north of West Durrington (site 8) are already within the Built Up Area boundary. In light of significant housing needs should the Council take a positive approach and look to bring forward these sites in advance of the adoption of the new Local Plan?

The WDNS site's development will complete the community at West Durrington; make best use of, and contribute to, infrastructure and facilities locally; and provide family housing on an accessible site suited to such provision. As a follow-on to the rapidly progressing Southern Sector of West Durrington to enable efficient development, but more importantly for the Borough, timely new housing, the planning process needs to move apace.


To this end, on a site which is both higher in a planning ranking than most and more benign environmentally, the answer to Q11(d) is – yes, the Council should take a positive approach and look to bring forward the WDNS (and other BUAB sites) in advance of adoption of the new WLP.

PLANNING POLICIES

Q12a - Do you have any views on how any of the listed policies should be worded?

Q12b - Are there any policies missing from the list?

Q12c - Are all of the listed policies required?

Name:	D Cramond	Signature	
Date:	22.6.16		

REFERENCE

Comment number: WIO-M-84

Date received: 22/06/2016



22 Jun (8 days ago)

to me

Dear Worthing council,

Please find attached (same is copied below).

Many thanks,
Katy

Q1. Vision

- a) I agree with the spirit of the vision that you have laid out but was disheartened to see that business is the focus of the first few words – for me, business should not be prioritised over fulfilling our basic human responsibility to look after vulnerable people in the town. All the while Worthing prioritises business over everything else, it will not meet its potential to be the most diverse, creative, vibrant town that it could be.
- b) Yes, but it is a little too safe – Worthing should have the confidence to be bold and take risks, e.g. with its architecture.
- c) That Worthing aspires to be a compassionate, caring town and have a reputation for this.

Q2.

- a) Community – yes, but ‘affordable’ must relate to rents as much as property to buy, and bold steps should be taken to ensure that residents of Worthing on average and lower wages can afford to have a home in the town, along with enough disposable income to participate in the town’s social and cultural events (helping to achieve the stated aim of reducing inequalities).
Public transport should be vastly improved – made much better value for money and coverage of routes improved.
I don’t believe you have been specific enough about exactly how inequalities will be reduced.

3. Economy

a) If Worthing commits to investing in and encouraging investment in green energy (e.g. wind farms) and local co-operatives, it will have the ability to meet some of the challenges. The scientific evidence supporting the need for such measures is there, such as the flood risk you outline throughout the consultation document.

It is the council’s responsibility to take decisive action to make our energy greener, which may involve challenging residents who take a ‘NIMBY’ attitude to green energy. (There won’t be lovely scenery to spoil if people continue on the same path and the climate becomes more and more extreme!)

Use of solar panels should be encouraged by residents, businesses and the public sector – proper incentives that will actually increase the likelihood of this option being taken up rather than token gestures.

Worthing should encourage all employers to pay a Living Wage (rather than low wages being propped up through benefits like Worthing Tax Credit).

- b) Yes, it should take a flexible approach and look beyond key employment areas.

4. Retail and the town centre

a) It is essential that public spaces around shops in the town centre remain public and are not transferred at any point to become property of the businesses there. The public space between shops must always be owned publically (unlike what has happened in Churchill Sq in Brighton).

Not enough has been made of how Community spaces - used democratically – can be incorporated into the space available in the town centre. E.g. some should be used for projects

that create things for young people to do in the town, which would also reduce anti-social behaviour.

- b) There could be more small businesses rather than chains (Worthing has a number of independent businesses and this should be supported as much as possible). Retail centres would be improved by more diversity which will be more likely to happen if new businesses are supported to thrive.
Where commercial properties are empty, these could be much better used as pop-up shops and/or for community purposes, as outlined above.
Events supported by the council encouraging residents to buy local should be encouraged, along with the rationale for this being to support a diverse and vibrant town centre.
- c) I believe that any more large OR local supermarkets in the town would not enhance Worthing's identity and should be avoided.

5. Tourism

- b) Worthing needs a proper tourist information centre in a logical area of town (ie. Near the train station)

6. Community/leisure

- a) Despite challenges, recreation parks must be protected from any private development or lack of maintenance.

Despite current challenges, Worthing council must also wholly commit to protecting the NHS and schools from outsourcing and privatisation, which we all know does not save the money suggested in the long run (corners are cut and things go wrong, we have solid research proving that the NHS is one of the absolute best in the world and excellent value for money). People will not be able to enjoy and contribute to making Worthing a great place to live if their healthcare is in tatters and private businesses are responsible for educating their children in an unregulated way.

- b) I think the free exercise equipment on the grass are on the seafront are brilliant and there should be more of this / the existing equipment should be well maintained and protected.

Existing resources which are under-used (such as the Lido) could be made much better use of. When I first moved to Worthing in 2010, there were live gigs at the Lido on Sundays, but these didn't last long. This would be the perfect space to have more community events at low cost.

- d) Mental health services need much more investment.
Worthing needs a central community centre where community projects can be nurtured and can reach more of the general public. This could give rise to better political engagement.

7. Transport

- a) I agree that cycle routes need to be improved – there need to be continuous routes throughout the county, and that bus routes are not adequate and need to be audited and improved.
- b) The above could be achieved by working with train providers to have better bike storage (space for 3-4 bikes per train is woefully short of what is needed) and also by working with Sustrans.

8. Environment

a) Yes, I agree that unique aspects of Worthing's geography e.g. the South Downs must be protected. This should include banning pesticides and fracking which pose huge risks to wildlife and fragile eco-systems.

b) All residents, including children and young people need to be better educated about how to recycle (e.g. what can be recycled and what to do with items that can be recycled but are not every-day recyclables).

9. Housing

a) yes, housing delivery should be given higher priority than other development needs.

b) We have a surplus of housing that is unaffordable for most residents and a huge need for social housing and genuinely affordable housing – this needs to be addressed in planning. Social housing should always be prioritised and never sold. Any income generated from social housing should be re-invested back into new social housing.

Homeless people in the town should be supported by the provision of all-year night shelters.

Extortionate agency fees should be banned as this adds to the unaffordable nature of renting for many residents and should be covered by landlords who profit from the properties. Landlords should be held more accountable for fulfilling their duty to maintain properties to a standard that you and I would expect. Rents should be capped to the LHA. Landlords should not be able to discriminate against people receiving benefits.

It should be ensured that any section 106 funding that the council is eligible for, goes directly to that purpose to support social and community infrastructure necessary to cater to new developments – the council must ensure that such funding is not diverted into other areas.

10. Development options

As above, it should be ensured that any section 106 funding that the council is eligible for, goes directly to that purpose to support social and community infrastructure necessary to cater to new developments – the council must ensure that such funding is not diverted into other areas.

11. Edge of town development opportunities

12. Planning policies

All suitable plots of land (especially derelict areas) should be given to housing associations in preference to property investors and developers.


It should be ensured that any section 106 funding that the council is eligible for, goes directly to that purpose to support social and community infrastructure necessary to cater to new developments – the council must ensure that such funding is not diverted into other areas.

Also, as above, we do not need any more supermarkets in Worthing, especially 'local' supermarket outlets, which are better given to smaller businesses / fair-trade / not for profit providers.

REFERENCE

Comment number: WIO-M-85

Date received: 22/06/2016

 22 Jun (8 days ago)

to me, Barry, clarkhodson, croppern, gilltucker, goringmalones, Jessica, mascha.richards, Susan, susan, Ted

Dear Sir

I attach comments by the Worthing Society on the paper on Issues and Options for the new Local Plan.

David Sawers



THE WORTHING SOCIETY

Issues and Options

Comments

The Worthing Society considers that the priorities for the new Local Plan should be:

1. Preserve the open spaces which now provide a green belt at the western and eastern edges of the town.
2. Preserve the present character of the town, while providing more homes, by ensuring that new buildings are well designed and harmonise with their surroundings. Height should not normally exceed four to five storeys. The Supplementary Planning Document on Tall Buildings should be revised to reflect this policy, and the rejection of tall buildings at the Aquarena and West Parade sites.
3. Protect and improve the town's heritage, especially those aspects represented by listed buildings and conservation areas. These assets and their history attract visitors to the town.
4. Spend more on promoting entertainment and cultural activities in the town to attract more visitors.
5. Encourage business activities which are appropriate for the character of the town, such as tourism and conferences.

The Vision

This section should point out that the intrinsic character of Worthing is its heritage assets and the related history. In Worthing of 2033, these assets should have been protected and enhanced to provide a more interesting and attractive town.

Strategic Objectives

Community

When discussing the provision of Infrastructure, the Local Plan should explain how adequate supplies of water for an increased population will be obtained. It could also provide that the location and density of new development should facilitate the use of public transport and minimise the need to travel.

Economy

This section could mention the desirability of providing facilities to make Worthing an attractive location for conferences.

Environment

The Society strongly supports the objective of protecting the green spaces on the east and west sides of the town, and the small section of undeveloped coast. The objective should be to secure permanent protection for these areas.

Key Issues

Economy

The Local Plan should include proposals for making Worthing more attractive as a location for conferences. They are a potential source of business for the town and especially its hotels. Unlike tourism, they provide business all year round. Worthing is near enough to London and Gatwick to be an attractive location for conferences; Eastbourne has successfully exploited this business. The use of the Assembly Hall and Dome cinema for conferences should be explored. Both are little used during the day.

Retail and the Worthing Town Centre

The main influence of the Borough Council over the health of retailing and the town centre derives from its role in maintaining and improving the public spaces, and its ability to refuse planning permission for developments which would reduce the attractions of the town centre. Its third possible role, as arranger of large-scale redevelopment projects, has proved difficult to execute in the recent past. It should therefore concentrate on the activities it can perform. It should spend more on improving the appearance of the town centre, while preventing developments which would damage its attractions and alter character.

Tourism

The heritage assets and history of Worthing are features that can attract visitors to the town. They should be exploited in the town's tourism strategy.

In seeking to promote opportunities for leisure and cultural activities in the town, to attract more tourists, the Council has to accept that it can do little to improve the "offer" without spending more. It should be prepared to support theatrical and musical performances, the facilities of the museum, and activities which make the town's heritage more visible. Planning policies are not enough. Voluntary activities, such as the Worthing Society's Blue Plaque Trail and its leaflets, already provide information on Worthing's history and heritage, but they need amplifying by the Council's action.

Community and Leisure Facilities

The Plan ought to spell out how revenue from the CIL will be spent. Medical facilities are especially important in Worthing because of the age of its population.

Transport

The Plan should consider the relevance of public transport to the desire to make the town centre attractive to visitors during the day and the evening. These issues should be examined in the proposed study of transport. If it shows a need for improved bus services, the Council should urge West Sussex County Council to finance improvements.

Environment

The Plan should contain policies which provide permanent protection from development for the gaps in development between Worthing and Sompting and between Goring and Ferring. It is especially important to protect the short stretch of undeveloped coast at Goring. If the designation Local Green Space is not appropriate for these areas and the government does not encourage the designation of new green belts, can the Council propose another designation that would give these areas permanent protection?

Smaller open spaces within the built up area should be designated Local Green Spaces where residents want to ensure their long-term protection from development.

Housing

The Society agrees that the Council should plan to accommodate part of the need for housing within the built up area by increasing the density of development. However, the amount of development should not be limited only by considerations of sustainability. It should also be limited by the desire to preserve the character of Worthing. New development should therefore be designed to harmonise with the surrounding buildings and the character of the town more generally. Heritage assets, including buildings on the Local List, should be well protected. Tall buildings would not normally be appropriate; four to five storeys, as at present characterises Worthing town centre, would be high enough to permit substantial increases in density, without being so tall that the skyline of the town is altered.

Such an emphasis on moderate building heights conflicts with the provisions of the Supplementary Planning Document on Tall Buildings. Its policy recommendation that the seafront is a suitable location for tall buildings has already been shown to be contrary to the policies of the Core Strategy, and to the policies of the National Planning Policy Framework, by the refusal of planning permission for tall buildings on the site of the Aquarena and in West Parade. The number of sites where tall buildings would be acceptable is small, limited to sites near railway stations. The

SPD on Tall Buildings therefore needs to be amended to reflect such a policy; it may be concluded that an SPD for so few potential sites is unnecessary.

The Society agrees that Worthing is unlikely to be able to find sites for 636 dwellings a year. It considers that an allowance of around 250 a year for windfalls should be the starting point for an assessment of the potential supply of sites; but it would be difficult to provide much more than half of the estimated need for dwellings without harming the character of the town.

Development options within the town

The ten sites listed are all suitable for some development; but in every case the design and scale of any development must be appropriate for its surroundings.

Edge of town development opportunities

Some of the sites listed in the table on pp29-30 may be suitable for development, as indicated in the comments on their features. However, members of the Society's committee are not sufficiently familiar with most of the sites to be able to express an informed opinion on their suitability for development. They are, however, familiar with Sites 3,4 and 5 and, as stated in the section on the environment, consider that these areas should be given permanent protection from development.

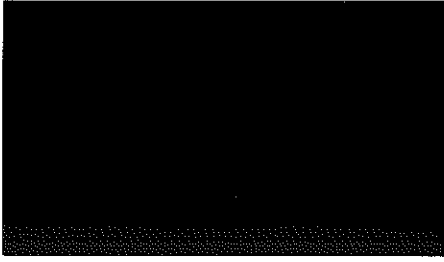
Planning policies

Quality of the built environment. The new plan should contain policies resembling policies 9 and 16 of the Core Strategy and the saved policies from the Local Plan of 2003, to ensure that new development is of good and appropriate design, so that it preserves and enhances the appearance of the town, and does not harm the amenities of existing buildings.

The historic environment. The buildings on the Local Interest List and in Conservation Areas, as well as those with statutory listing, should be mentioned as deserving protection. The Local List merits a policy of its own, to set out the criteria for selecting buildings for the list. The list would then need to be reviewed, to assess the buildings now on the list against the criteria. More resources would have to be devoted to conservation if these objectives are to be realised.

The visitor economy. Visitor facilities should include facilities which present the heritage and history of Worthing to visitors.

The Worthing Society



REFERENCE

Comment number: WIO-M-86

Date received: 22/06/2016

22 Jun (8 days ago)


to me

Hello,

Please find attached our completed consultation document. Please feel free to contact us if you have any questions.

Regards,

Jeff & Vickie



Office Use only
Comment number:
Date received:

Your Town - Your Future
A new Local Plan for Worthing
Consultation Document May 2016
Comments Form

Worthing Borough Council has started work on preparing a new Local Plan which will have a big influence on the town in the period up to 2033. The publication of the 'Your Town - Your Future' consultation document provides the first opportunity to comment on relevant issues and options.

This consultation runs from 11th May to 22nd June 2016

Website: www.adur-worthing.gov.uk/worthing-local-plan
 Email: please email this completed form to worthinglocalplan@adur-worthing.gov.uk
 Phone: 01903 239999
 Address: Planning Policy Team, Worthing Borough Council,
 Portland House, 44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	Mr. Jeffrey and Mrs. Vickie
Last name	Glick
Organisation (where applicable)	na
Address line 1	
Address line 2	
Address line 3	
Postcode	
Email address	na

You can respond to this consultation online or by email. However, if your preference is to make comments manually this form can be photocopied as many times as necessary.

To keep you informed on progress all respondents will be added to the Worthing Planning Policy consultee database unless you request otherwise.

Use of information: Names and comments we receive will be available for public inspection and may be reported publicly as part of the Local Plan process. Contact details will not be published. Further information about how personal information is processed can be found on the Council's website. Unfortunately we cannot accept or report confidential or anonymous responses. All data will be stored securely in line with the Data Protection Act 1998.

Section B - Comments

The consultation document summarises issues and options within thematic sections. General comments can be inserted in the box below and comments about specific sections of the Plan can be made in response to some key questions that follow.

We have tried to provide lots of comments which we hope you will find useful. We would be happy to discuss any of our comments further if you would like to follow up.

Our family loves living in Goring. We love the beach, the green spaces and parks. We utilise the libraries regularly and have attended many performances at the Assembly Hall as well as the Connaught and Pavilion theatres. The town centre is relatively vibrant and crime is low. When ever we come back for a day in London we smell the clean air and savour the silence as we walk home.

That said we would like to see some vision incorporated in the local plan, not the same old same old. Our children are important, climate change is happening and must be reversed, income inequality is at an all time high and public dietary health is declining.

- We would very much like the council to strongly consider establishing a public banking system with the sole purpose to better the community instead of reaping vast financial profits. operate as any other bank with the exception of their profits are put back into the community instead of shareholder pockets.
- We would like Adur and Worthing council to take the lead on environmental sustainability and energy efficiency. Demand new builds take advantage of the latest environmental products and encourage residents to maximise energy efficiency when retrofitting with low interest loans provided by the new public bank.
- We would like to see schemes which encourage community gardens which produce food locally. We are not referring to allotments but areas which can be turned into one small garden jointly managed by members of the community. Perhaps the council could provide sheds for tools.
- Lastly we would like to see greater investment in our children. There are some fantastic facilities but further improvement and expansion would not go amiss. Think roller skating, ice skating, climbing wall, miniature (aka crazy) golf and fun risky playgrounds.

VISION

Q1a - Do you agree with the Vision we are aiming and aspiring to achieve?

Yes

Q1b - Does it provide a clear direction for the Worthing Local Plan?

Yes

Q1c - Is there anything you think we have missed which you would like to see incorporated in the Vision?

Yes, I would like the following or some close approximation of the following added to the vision statement.

"High quality new, environmentally sustainable and energy efficient development, which, promote low carbon and methane lifestyles will be integrated..."

--

STRATEGIC OBJECTIVES

Q2a - Do you agree with the proposed objectives set out above? If not, what changes would you like to see?
--

Yes except I would add in "...high quality new, environmentally sustainable and energy efficient development, which, promote low carbon and methane lifestyles will be integrated..." to bullet point 1 in the Community Strategic Objectives.
--

In addition I would like to see the Economic Strategic Objectives include the establishment of a public banking option for the benefit of both Worthing residents and businesses.

Q2b - Are the objectives sufficiently distinctive and locally specific?

Yes

ECONOMY

Q3a - Do you agree with the key challenges identified for the economy? Are any missing?

They seem reasonable but I don't feel that I can really comment, I just don't have the knowledge.

Q3b - Should the Local Plan continue to protect key employment areas or should it be more flexible in its approach?

Again I feel that I am commenting blind. I don't understand the implications of "flexible" as opposed to ridged. I would have preferred the consultation document to expand on the significance of these approaches. Without this information I am unable to provide an informed comment.

Q3c - In addition to the sites already identified as having the potential to deliver employment land are there any other sites that could accommodate employment growth?
--

Not that readily come to mind.

RETAIL AND THE TOWN CENTRE

Q4a - Have all the key challenges for retail areas and the Worthing town centre been identified, if not what has been missed?

I would like the following two bullet point added to the key challenges:
--

<i>"Improve the aesthetic quality of retail amenities."</i>

<i>"Improve accessibility of retail amenities for disabled residents and tourists."</i>

Q4b - Are retail centres functioning well - how can they be improved?

Generally yes I guess but I'm only thinking of Goring and West Worthing where parking is available. West Worthing in particular has a nice feel especially now with the Saturday market stalls.

The town centre has a nice feel but dies off completely after 16:00 which is a shame. Not everyone wants to go to a pub. It would be wonderful to have a few cafés open later into the evenings especially during the summer months.
--

Tarring Road (between Worthing and West Worthing stations) on the other had is exceptionally run down and difficult to utilise due to parking limitations. In addition it doesn't give one the
--

impression of safety and security.

Q4c - How could new development in the town centre enhance the town's identity and attract more visitors?

Not sure.

TOURISM

Q5a - Have the key challenges for tourism been addressed?

Yes

Q5b - In what ways can the tourism offer be improved?

1. Consider encouraging shops and cafés to stay open until 22:00 hours once a month on a Friday and/or Saturday during the months of May, June, July and August. The council could do this by offering to reduce business rates by x% to help offset additional labour costs.
2. Create a theme such as art or music. Once a month encourage local artists to set up stalls along the promenade. Day rates could be on a sliding scale so if it is your first few times, it's free or at a heavily reduced cost.
3. The same with music. Promote it! Actively seek local musicians to perform in the green space between hotels near the Pavilion theatre and/or in the centre of town.
4. We would like to see the old Aquarena turned into an ice skating rink. How hard would that be? Fill in the pool with concrete, put in a refrigeration unit, rip out a wall so you can move in a ice scraper truck doodad and Bob's your uncle. It's already got bleachers for people to sit and watch. Add in a small concessions stand at the entrance and away we go. How could it not turn a profit?
5. Install an American style miniature golf course in the green space next to Splashpoint Leisure Centre.
6. Hold science and technology seminars in the assembly hall. Invite in guest speakers from Sussex University, Brighton University etc. to talk about their research.
7. Reduce theatre rental rates for local non-profit and low profit groups and businesses. It thinking of things like scouts, and local dance and drama groups.

The difficulty with all these things is price. Like most people, the 'cost of living increases' I receive each year constantly lag inflation so in real terms I have less and less discretionary capital. At the end of the day I need to pay for things like food, shelter, clothing, water, gas and electricity before I spend it leisure activities no mater how good they are.

COMMUNITY AND LEISURE FACILITIES

Q6a - Do you agree with the main challenges identified in planning for the provision of different infrastructure needs? Are any missing?

Yes.
Not that we can think of.

Q6b - Do you have suggestions for how the Local Plan could resolve these?

To identify infrastructure needs, conduct a survey. Set up a stand in town and ask people what they think. Or hold some evening workshops at the Assembly hall. Invite people in, have some

coffee and cakes set up. Deliver a short presentation then ask people to get together to discuss ideas. You will need to provide some fascinatons to ensure you are capturing sensible comments but that's not hard. Heck you can probably get some people to volunteer from the community to lead the small group discussions.

Q6c - Are you aware of any particular community and leisure needs?

As mentioned above we would like to see the old Aquarena turned into an ice skating rink. How hard would that be? Fill in the pool with concrete, put in a refrigeration unit, rip out a wall so you can move in a ice scraper truck doodad and Bob's your uncle. It's already got bleachers for people to sit and watch. Add in a small concessions stand at the entrance and away we go. How could it not turn a profit?

Turn one of the old disused light-industrial warehouses over by the tip into a roller-skating rink and run it at costs so kids can afford it.

We would also like to see more community centres which can be utilised a low cost. For example there is facility in Durrington near the Tesco, could one be built in Goring?

Install paved paths through green spaces for elderly residents or those residents confined to a wheelchair so that they can more easily enjoy these areas.

I would like to see more bike stands so people have a place to lock up their bikes.

Improve the play areas for children and increase the numbers. I realise that the majority of residents are old and grump but seriously children are our future. It is important that they have areas to play which offer some challenge. I'm not calling for replacing the shock absorbent surfaces with asphalt and broken glass but a degree of risk wouldn't go un-missed. Seriously, the play grounds are so namby-pamby now a days it's not even funny.

We think an outdoor fitness area similar to what you can find on Lancing on the beach would be a good improvement. Something like that could be built on Goring Green or further west along the beach. Ideally it could be spread over a half mile to a mile. We also think a military style obstacle course would be loads of fun but that my be pushing it a bit.

TRANSPORT

Q7a - Do you agree with the main challenges identified? Are any missing?

Yes
Not that we can think of.

Q7b - Do you have any suggestions for how the Local Plan could better promote sustainable transport?

We would like to see more cycle paths which don't abruptly end in potholes. Also, more bike racks could be provided so people have some place to lock up their bike.

Perhaps the bike path along the sea front could be widened and extended to Sea Lane Café so that both cyclists and pedestrians can move along safely.

How about Bores Bikes? They could be placed in Goring, West Worthing, Worthing, East Worthing, Durrington, Broadwater, Worthing etc. Pilot the concept in one or two areas. May it would work, maybe not.

Install electric car charging points in the multi story car parks and in the car park behind the library in town.

ENVIRONMENT

Q8a - Do you agree with the main environmental challenges identified? Are any missing?

Yes

Q8b - Do you have any suggestions for how the Local Plan could reach a balance between competing needs?

???

Q8c - Are there any circumstances you consider where regardless of mitigation, development would be inappropriate?

Yes, all along the coast, Goring Gap, and Goring Green. I think development in these areas would be completely inappropriate but as a resident of Goring, I'm probably a bit biased. That said, when we have friends to visit they always comment about what a lovely space it is and how lucky we are to have essentially a small rural setting within in a town.

Q8d - What value do you place on the borough's green spaces, particularly those around the town?

I very high value. It's such a wonderfully open and peaceful area full of wildlife. The health of the community is greatly enhanced by it's presence.

HOUSING

Q9a - Should housing delivery be given higher priority than other development needs (e.g. employment land, community facilities)?

I'm not sure. It feels with a target like 643 houses/yr (taking in local constraints of course) imposed by central government it must take on a high priority. That said I personally think infrastructure such as roads, doctor surgeries, schools, emergencies services etc. must be developed in line with any proposed housing increases.

Q9b - How should we best address specialist housing needs (e.g. affordable housing; family housing; self-build housing; sheltered & extra care; houses in multiple occupation)?

What options are there? With out options or some type of guidance I find it hard to comment.

I think special hosing is incredibly important but the communities where these types of accommodations are established need support as well.

We would like to see 'no strings attached' social housing for homeless people in Worthing. This model is working very well in Utah, U.S.A. and I'm sure could be adopted here. Happy to provide reference if anyone in interested.

Q9c - Efficient use of land will help to raise densities and will contribute towards meeting development needs. What potential impacts of this should the Council try to mitigate?

Traffic congestion, school and doctor surgery over subscription, increased impact on emergency services.

Q9d - Should the Council include a policy that would resist the inappropriate development of residential gardens?

What is "inappropriate" development? If you're talking block of flats in a 15x15 metre garden, then yes but if your are talking about limiting extensions or the addition of renewable energy generation

systems then no.

DEVELOPMENT OPTIONS WITHIN THE TOWN

Q10a - Do you agree that the sites listed above provide the most significant redevelopment and regeneration opportunities to deliver housing, employment and leisure uses within the town?

Yes.

Q10b - Do you have any particular comments on how any of the identified sites should be developed and for what mix of uses?

Yes, Site 5. We think due to its location to the train station that it should be developed in such a way as to welcome people to Worthing. I'm sure we can all agree that it doesn't look very nice right now and it feels rather scary at night.

Q10c - Are there any other potential development sites within the current built up area that should be assessed?

Not that come to mind. We think you did a good job identifying them.

EDGE OF TOWN DEVELOPMENT OPPORTUNITIES

Q11a - Given the housing needs in the Borough do you have any views as to which of these sites should be developed or protected?

Yes. Protect Sites 4 & 5 from development. We think development in these areas would be completely inappropriate but as a resident of Goring, we are probably a bit biased. That said, when we have friends to visit they always comment about what a lovely space it is and how lucky we are to have essentially a small rural setting within such a short distance from our home. In the summer loads of people pour down Aldsworth Avenue from Goring train station to enjoy the space. It's so popular.

Q11b - If any of these sites (in full or in part) are to be allocated for development do you have any views on how they should be developed?

IF and ONLY IF Site 4 had to be developed we would want the new houses to look similar and have a similar density to the houses west of Sea Lane and east of Aldsworth Avenue. The last thing we would want to see would be those cardboard cut-out houses currently being thrown up where Worthing sixth form collage use to be located.

Site 5 should mirror those houses east and north of Goring train station.

Q11c - If any of these sites are not allocated for development do you have any views on how they should be protected, enhanced or used?

I would like to seek the farm land stay as it is but if it had to go I would like it be turned into a park filled with trees. Maybe some fixed shelters with BBQ pits, a decent play ground, paved trails for disabled people to use. Put in a small pond.

Q11d - Land West of Fulbeck Avenue (site 7) and Land north of West Durrington (site 8) are already within the Built Up Area boundary. In light of significant housing needs should the Council take a positive approach and look to bring forward these sites in advance of the adoption of the new Local Plan?

Yes, we think that sounds reasonable. Anything to save Goring.

PLANNING POLICIES

Q12a - Do you have any views on how any of the listed policies should be worded?

Sustainable design: Require higher water, energy (electricity/gas/wood/pulp) efficiency levels above national standards.

Energy: Support standalone energy schemes and require a high proportion of energy used in development to be from renewable or low carbon sources. *Possibly define "high" as economically feasible or practicable.*

Housing Mix and quality: Ensure an appropriate architectural mix of dwelling types, tenures and sizes that respond to local need, *exceed national energy and sustainability standards and meet nation minimum space standards (and ...)*

Density: *Ensure new housing development does not exceed ten houses per acre*

The visitor economy: *Support provision of visitor facilities (i.e. toilets, map kiosks/stands benches etc.) With regards to maps kiosks, think Covent Garden up in London. There are maps on every corner.*

Planning for sustainable communities: Protect, support improvements and *increase the number of local social and community facilities.*

Pollution and contamination: Ensure development does not lead to an *unacceptable level of pollution risk.*

Water quality and protection: add in *NO High Volume Hydraulic Fracturing (HVHF) operations in Worthing.*

Telecommunications: Establish approach for managing telecommunications development *which avoids the placement of cellular communication towers in close proximity to schools, residential areas, hospitals, retirement homes and community centres.*


Q12b - Are there any policies missing from the list?

Not that we can think of.

Q12c - Are all of the listed policies required?

Yes

Please continue on separate sheets as necessary

Name:	JEFFREY M. GLICK	Signature	
Date:	22/06/16		

REFERENCE

Comment number: WIO-M-87

Date received: 22 /06/2016

Rebecca Gunn <rebecca.gunn@rapleys.com>

22 Jun (8 days ago)

to me, Robert

Dear Sir/Madam

We act on behalf of our client, Rabbit Group, and have been instructed to submit representations in relation to the above consultation. As such please find enclosed the following:

- Covering letter,
- Completed issues and options form, and
- Site location plan.

We look forward to receiving written confirmation that these representations have been received and duly made as part of this consultation exercise.

Kind regards

Rebecca

Rebecca Gunn
BA (Hons) MSc MRTPI
Senior Planner
Town Planning



RAPLEYS

RLG/1109/101/1

22 June 2016

Planning Policy Team
Worthing Borough Council
Portland House
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BN11 1HS

51 Great
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0370 777 6292
info@rapleys.com
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BIRMINGHAM
BRISTOL
EDINBURGH
HUNTINGDON
LONDON
MANCHESTER

Dear Sir/Madam


Re: Worthing Local Plan Consultation May 2016

We act on behalf of our client, Rabbit Group, and have been instructed to submit representations in relation to the above consultation. Our client owns the freehold interest of the land to the rear of Juno Close, Barrington Road (as identified on the enclosed Site Location Plan).

As such, please find our representations detailed in the completed Issues and Options Form. We respectfully request that the local authority fully considers the representations to ensure that our client's primary objective to bring forward the site for development is reflected in the Local Plan.

We look forward to receiving written confirmation that these representations have been received and duly made as part of this consultation exercise, and we request that all correspondence is sent to Rebecca Gunn at the London Office.

Yours sincerely,


Rebecca Gunn (Jun 22, 2016)

Rebecca Gunn
BA (Hons) MSc MRTPI
Senior Planner
Town Planning
Rebecca.gunn@rapleys.com


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Comment number:

Date received:

Your Town - Your Future
A new Local Plan for Worthing
Consultation Document May 2016
Comments Form

Worthing Borough Council has started work on preparing a new Local Plan which will have a big influence on the town in the period up to 2033. The publication of the 'Your Town - Your Future' consultation document provides the first opportunity to comment on relevant issues and options.

This consultation runs from 11th May to 22nd June 2016

Website: www.adur-worthing.gov.uk/worthing-local-plan

Email: please email this completed form to worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council,
Portland House, 44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	Rebecca		
Last name	Gunn		
Organisation (where applicable)	Rapleys LLP		
Address line 1	51 Great Marlborough Street		
Address line 2	London		
Address line 3			
Postcode	W1F 7JT	Telephone	██████████
Email address	Rebecca.Gunn@rapleys.com		

You can respond to this consultation online or by email. However, if your preference is to make comments manually this form can be photocopied as many times as necessary.

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Section B - Comments

The consultation document summarises issues and options within thematic sections. General comments can be inserted in the box below and comments about specific sections of the Plan can be made in response to some key questions that follow.

We act on behalf of our client, Rabbit Group, and have been instructed to submit representations in relation to the current consultation. Our client owns the freehold interest of the land to the rear of Juno Close, Barrington Road (as identified on the enclosed Site Location Plan).

As such, please find our representations detailed on the completed Issues and Options Form below. We respectfully request that the local authority fully considers the representations to ensure that our client's primary objective to bring forward the site for development is reflected in the Local Plan.

ECONOMY

Q3b - Should the Local Plan continue to protect key employment areas or should it be more flexible in its approach?

It is assumed that the "Key Employment Areas", as referenced in this question above, relate to Policy 4 of the adopted Core Strategy April 2011. For industrial estates, this comprises a list of facilities from Broadwater Business Park to Yeoman Way, with key office locations being identified from Liverpool Terrace to Farncoombe Road.

Expressly, therefore, land at Martlets Way does not comprise a Key Employment Opportunity, or Area. Our client supports this position, particularly having regard to its comments relative to Question 10a, as relating to development options within the town.

On this basis, it is considered that the emerging Local Plan should continue to protect the cited Key Employment Areas, which have been identified through interrogation, and examination, as part of adoption process of the Core Strategy, April 2011.

These Key Employment Areas are suited to provide a range of employment opportunities and, therefore, will assist in meeting the identified employment needs of the recent study by Nathaniel Litchfield (entitled "Worthing Economic Research and Employment Land Review", April 2016). Such sites should only be lost, therefore, to alternative uses under exceptional circumstances.

There are a number of sites which are identified as "Areas of Change" which represent opportunities for redevelopment and renewal. These sites provide the appropriate mechanism to more provide for a balance between the distribution of employment and other land uses. Specifically, these sites, unlike Key Employment Areas, are already acknowledged – in principle – as offering redevelopment opportunities to contribute towards the delivery of, inter alia, housing within the Borough.

HOUSING

Q9a - Should housing delivery be given higher priority than other development needs (e.g. employment land, community facilities)?

The NPPF, paragraph 14, advises that planning authorities should positively seek opportunities to meet the development needs of their area. In this case, two matters arise:

- Worthing has an Objectively Assessed Housing (OAN) need, up to 2033, of 12,720 dwellings, with 4,049 being required between 2015-2020 (with 5% buffer). The supply, however, equates to a little over 2000 dwellings (up to 2020) or, in other language, demonstrates a 2.5 year supply of deliverable sites (Worthing Annual Monitoring Report, 2014-15).
- Worthing has an overall gross Class B employment floorspace requirement of between 54,690sq.m to 122,940sq.m, during the period up to 2033, which in broad terms equates to a need between 11.6 and 26.6 hectares. The range depends on a number of factors, including labour demand, completion rates and labour supply (which is directly linked to the number of dwellings per annum).

In light of the above, there are clearly ongoing requirements – over the plan period – for both employment and residential land. It is questionable whether the planning authority can meet its needs, having regard to its geographical and environmental constraints. It is bound, to the south, by the English Channel and, further, is enclosed to the north by the defined South Downs National Park.

As a consequence, therefore, the planning authority will need to balance, and as appropriate, prioritise its land use delivery strategy. The NPPF advises that, at paragraph 22, the long term protection of land for employment use should be regularly reviewed. It continues, at paragraph 49, by advising that there is a presumption in favour of sustainable housing development and, where housing supply does not meet its 5 year target, relevant policies should not be considered up to date. This, coupled with the nature of the employment projections, as informed, in part, by housing supply, indicates that housing delivery should, as appropriate, be given higher priority than other development needs.

DEVELOPMENT OPTIONS WITHIN THE TOWN

Q10a - Do you agree that the sites listed above provide the most significant redevelopment and regeneration opportunities to deliver housing, employment and leisure uses within the town?

These representations focus on Area of Change 7 (Martlets Way) and, due to its proximity, Area of Change 9 (HMRC Offices, Barrington Road).

These sites, in principle, are agreed to provide significant redevelopment and regeneration opportunities to deliver a range of uses, including housing.

In this respect, whilst the Worthing Economic Research and Employment Land Review (prepared by Nathaniel Litchfield and Partners, April 2016) assumes that Martlets Way will come forward, in its entirety, for employment use (although our client reserves its position to interrogate this matter further), the opportunity – as noted in the Issues and Options Consultation Document (May 2016) – is less prescriptive. It merely seeks to focus on employment uses, rather than assume comprehensive employment development.

In practice, however, Martlets Way should be recognised – more readily – as a residential site, not least because:

- Residential development should be given priority, as appropriate, over other land uses (see representations relative to Q9A above)
- The site represents an underutilised, brownfield site within the urban area of Worthing in

close proximity to Mulberry Local Centre. Its redevelopment, for housing, would be highly sustainable, in accordance with National and Local Policies.

- The site has, previously, benefited from employment consents, albeit without the implementation, which clearly indicates potential challenges for bringing forward employment usage.
- The site is bounded, to the south, by residential development and thus its redevelopment, for such use, will be in keeping with the existing context of the area. Further, the residential nature of the area could be a constraint for bringing forward particular industrial activities at the site.
- The planning authority is failing to meet its Objectively Assessed Housing (OAN) needs, by some margin, with a 2.5 year housing land supply. As such, residential development at this site, would contribute to meet the identified shortfall.


Overall, therefore, the site is suited for residential development which, as a minimum, should be utilised to enable employment floor space elsewhere on the land.

That aside, and given the proximity of Area of Change 9 (HMRC Site) to Area of Change 7 (Martlets Way), there is logic in combining these into one opportunity and promoting joint working between the land owners. This methodology would assist the planning authority in maximising the opportunities to realise the effective distribution, and balance of land uses, between residential and employment (not least because the HMRC site is recognised, by the recent study Nathaniel Litchfield Study, as an important employment resource and, therefore, any alternative uses need to be considered in this context).

Any policy, in this regard, would need to "equalise" the benefits arising on the respective land holdings. Put simply, any desire to accommodate employment in one part of an extended Area of Change would need to be "compensated" by residential floor space elsewhere within the area. Otherwise, the extended Area of Change may struggle to be delivered.

Our client will be pleased to investigate this matter further with the adjoining land owners, and liaise with officers to inform the next stage of plan preparation.

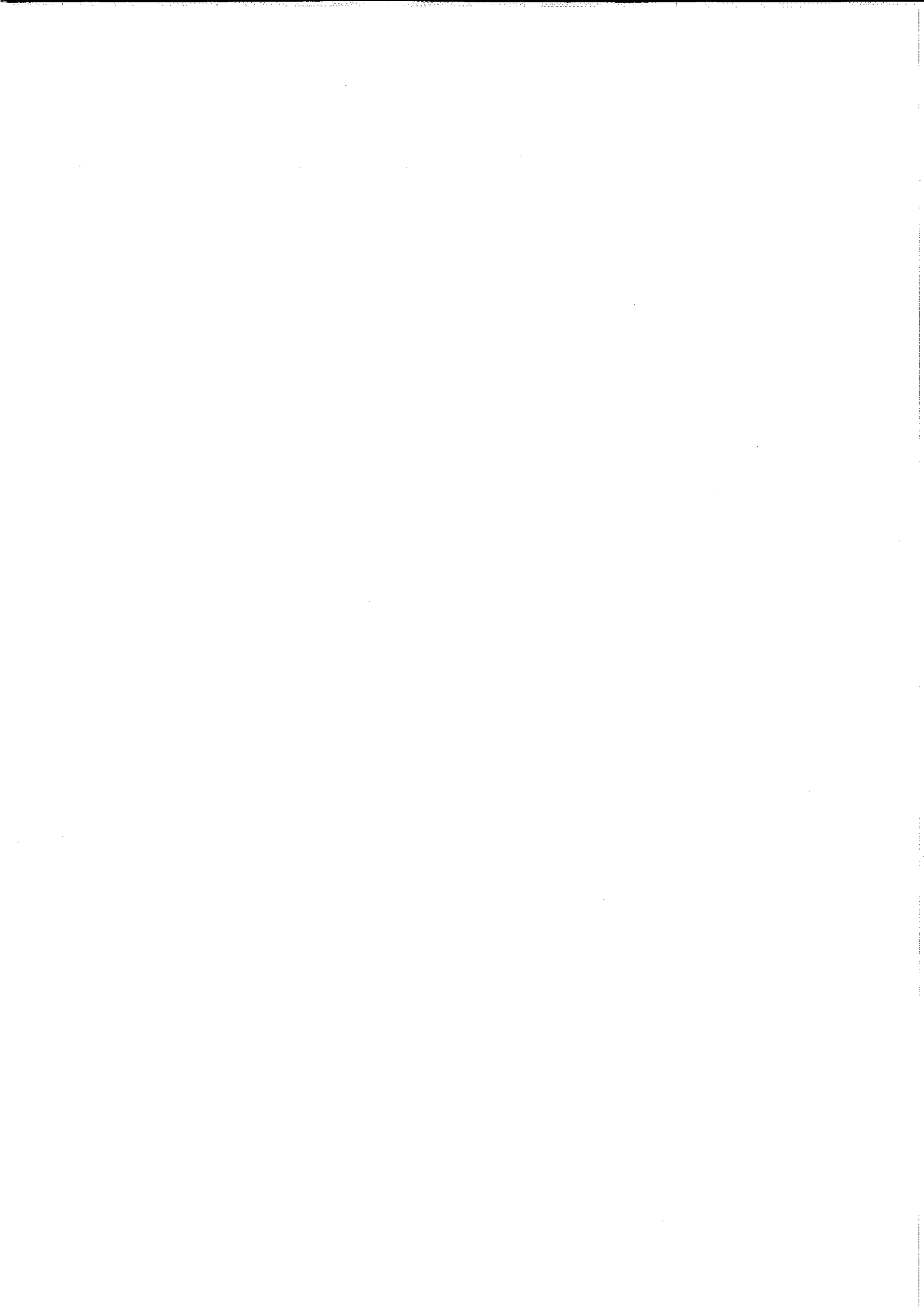
Please continue on separate sheets as necessary

Name:	Rebecca Gunn	Signature	 <small>REBECCA GUNN (22 JUN 2016)</small>
Date:	22 June 2016		

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0570 777 6282

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REFERENCE

Comment number: WIO-M-88

Date received: 22/06/2016

Dear Ian and Tracy,

On behalf of Steve Norris, and with regard to your letter dated 11th May 2016, please find attached our response in relation to the Teville Gate site and Worthing's Local Plan Issues and Options consultation.

Kind regards

Chris

Christopher Cooper
Senior Planner

For and on behalf of Carter Jonas LLP
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Your ref: AOC 5 (Teville Gate)

Our ref: Teville Gate

Mr I Moody
Planning Policy Team
Worthing Borough Council
Portland House
44 Richmond Road
Worthing
BN11 1HS

21st June 2016

Dear Mr Moody

WORTHING LOCAL PLAN ISSUES AND OPTIONS CONSULTATION

SITE REFERENCE: AOC 5 – TEVILLE GATE, WORTHING

I write further to your letter dated 11th May 2016 regarding the Council's preparation of its new development plan, the Worthing Local Plan, and the first stage of consultation on it (the Issues and Options stage) which is published for consultation and running until 22nd June 2016.

The new Plan, which looks ahead to 2023, will provide the strategy for the growth of the Borough, setting out what development will take place and where. Once adopted, it will replace the Borough's existing local planning policies and will be an important consideration in deciding planning applications.

This initial consultation seeks the views and suggestions on how Worthing should grow and develop in the future. It identifies the challenges facing the Borough and the options that could address them. Unlike many other local authority areas spread over wide areas, there are only a limited number of development options in and around the town. The Council is therefore asking views on how best to balance the delivery of growth and regeneration across the Borough to meet future needs whilst at the same time protecting the things the Council value about the town. The comments received will help the Council inform the drafting of the Preferred Options Local Plan which is expected to be published for consultation in early 2017.

As part of the current review, the Council are looking at which sites will be needed to deliver the appropriate mix of land uses. All realistic options in the Borough will need to be tested to assess whether they can contribute towards meeting the identified development needs (housing, retail, leisure, employment etc). In line with Government requirements, the starting point in this process is to encourage the effective use of land by reusing sites that have been previously developed (brownfield land).

In this regard, you have written to us regarding our client's site, known as Teville Gate, in Worthing. The site lies north of the town centre, almost immediately south of the railway station and forms an important strategic route through from the station down to the town centre to the south. The site is one of twelve Areas of Change (AOC) which were identified in the adopted Core Strategy (2011) and were considered to present the best opportunities to deliver regeneration and help provide for some of the housing, leisure and employment opportunities within the Borough. You have indicated that the Council are proposing that the approach for previously developed sites, which was endorsed at the Core Strategy Examination, is taken forward within the new Local Plan.

The site is identified within Adur and Worthing's Strategic Housing Land Availability Assessment (SHLAA) (Ref: WB08039) as a potential housing site having the potential to deliver 260 residential units. The latest SHLAA report, published in December 2015, has regard to the Teville Gate site and as with other significant opportunities identified in the SHLAA, will be taken forward as an Area of Change within the new Local Plan. Whilst some of the identified Areas of Change have now been delivered, the appropriate redevelopment of the remainder is still supported by the Council.

The Teville Gate site is currently identified in the Core Strategy (2011) as Area of Change 5 (AOC 5) and is considered by the Council as an opportunity to establish a distinctive mixed use gateway site that delivers a range of uses. At the time the Core Strategy was adopted, the Council had resolved to grant planning permission on the site for 235 residential units and a mix of leisure and retail space. Subsequently, outline planning permission was granted pending the completion of a legal agreement. The outline mixed use scheme comprised of a multi-screen cinema, restaurants and cafes, a food store, hotel, health and fitness suite, offices, conference and exhibition centre and 260 residential units. The legal agreement was never signed and the site has since changed ownership and is now owned by our client, Mosaïque Capital Ltd.

You have indicated that you are aware of ongoing discussions in relation to the redevelopment of the site but for completeness have stated that it is essential for the process surrounding the emerging Local Plan that the Council has the most up to date information. This is because the SHLAA and the identification of our client's site will be the subject of close scrutiny by the Inspector at the examination of the plan.

Teville Gate – Deliverability and Mix of Uses

In response to your letter and the above, I can therefore confirm on behalf of our client, Mosaïque Capital Ltd, that they still have an active interest in the Teville Gate site. This is demonstrated by the current ongoing conversations that are taking place with James Appleton and the Planning Performance Agreement which the client is entering into with the Council to help guide the proposed development on the site through the planning process from pre-application stage to determination.

In short, the site, which currently excludes Teville Gate House, is earmarked to provide a high quality, mixed use development, providing up to 450 mixed residential units, a retail supermarket and other ancillary retail uses, including the potential for cafés and restaurants. The proposals will provide landmark buildings in a sustainable urban environment, and a high quality pedestrian route for the public to pass through from the station down to the town centre to the south.

In terms of timing, the client is intending to submit a planning application in the second half of 2016 with planning permission expected in early 2017. Construction is therefore expected to start on site in early to mid-2017. The Council's aforementioned letter to which this response relates is therefore correct in its assumption that the site is still suitable, available and achievable.

Issues and Options Consultation Document: Your Town – Your Future (May 2016).

In direct response to the Council's Issues and Options Consultation Document ("*Your Town – Your Future*" – May 2016), the site will contribute to the Council's vision of the regeneration of Worthing, as laid out in the Document, bringing back into use an important strategic gateway site into the town centre.

The site will be developed in the most efficient and sustainable way possible to maximise the delivery of the widest range of identified needs, whilst ensuring that the Borough's intrinsic character is protected and enhanced. It will also contribute to the Borough's strategic objectives, providing high quality new homes for the community that will reflect the identified needs within the Borough and contributing to the town's economy, providing employment opportunities.

It will also enhance one of the key gateway approaches and transport corridors leading into the town centre, whilst also delivering high quality public realm and enhanced infrastructure to attract inward investment.

Lastly, it will make full and efficient use of previously developed land in recognition of the environmental and physical constraints to development posed by the sea and the South Downs. The site will balance the Borough need for new housing and employment opportunities.

The proposed retail provision on the site will be acceptable in this location and will contribute to the success of the town centre, providing for current and future needs, complementing the offers in the town centre. The proposal will contribute to the role of the emerging Local Plan by promoting a competitive, attractive and diverse town centre that provides choice and a diverse retail offer which would reflect the individuality of the town.

In terms of transport, the site is located in close proximity to the station and town centre and therefore will promote sustainable modes of travel for residents as far as possible, which will respond to the challenges facing the Borough.

The Council has already started to update key components of the housing evidence base, including a study which examines the level of housing need in the Borough. This work concludes that the need for new housing is considerably higher than the Council is currently planning for within the existing Core Strategy. The Issues and Options Consultation Document sets out that, given the lack of available land within the Borough and significant environmental constraints, it is highly unlikely that the Council will be able to achieve this. The role of the new Local Plan review is to assess what level of growth we can reasonably and sustainably provide for.

The Worthing Housing Study, published in June 2015, sets out that the objectively assessed need for housing in the Borough between 2013 and 2033 is 636 dwellings per annum, which is significantly more than is currently being delivered or planned for. The Teville Gate site will respond to the Borough's housing need, seeking to maximise the site's potential for housing, above the level of provision that was sought previously under historic planning applications. The client recognises the clear need for housing in the Borough, as well as the site's strategic location, and as a result seeks to develop at a higher density than previously. The higher density will be acceptable given the site's location close to the town centre, in close proximity to the station and other transport links. The relevant contributions stemming from the development on the site will deliver the relevant and necessary economic benefits and funding from developers to help mitigate housing pressures. Maximising the housing potential on a brownfield site like this helps to relieve pressure on greenfield land from inappropriate development; a key challenge in the Borough of Worthing.

Conclusion

The SHLAA update (2015) explains that the site was considered in 2009 as part of the SHLAA review and at that time was considered to be suitable, achievable and deliverable. Since that time it has been identified as an Area of Change in the Borough's adopted Core Strategy and has also benefited from a resolution to grant outline planning permission, pending completion of a legal agreement, albeit that was never signed. Again in 2013/14, it was concluded that the site remained suitable, available and achievable and should be taken forward at that time.

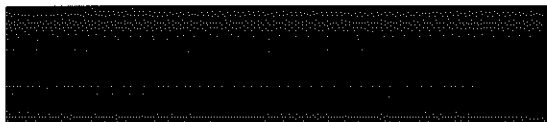
Since that time, our client has bought the majority of the site, with Teville Gate House currently outside of his ownership. They have confirmed their commitment to redevelop the site and have been working with the Council with an aim to submit a planning application for a mixed use development on this site in Autumn 2016.

The SHLAA update in December 2015 reconfirms that the site status should remain as potential and is taken forward in that study.

We would reiterate the site's important potential for Worthing and the regeneration of the wider area, particularly given its important strategic location adjacent to the railway station and adjacent to one of the main highway links into town. The site remains one of the most important regeneration sites within Worthing and our client is determined to ensure that the site is suitable, available and achievable. The site should therefore be taken forward as an Area of Change within the emerging Local Plan.

Carter Jonas

Yours sincerely



Dr Steven Norris
Partner

E: steve.norris@carterjonas.co.uk
T: 020 7529 1527



REFERENCE

Comment number: WIO-M-89

Date received: 22/06/2016

From: **Bowie, David** <David.Bowie@highwaysengland.co.uk>
Date: 22 June 2016 at 13:09
Subject: Worthing Local Plan - Issues and Options Consultation 11 May -22 June 2016
To: "ian.moody@adur-worthing.gov.uk" <ian.moody@adur-worthing.gov.uk>, Tracy Wigzell <tracy.wigzell@adur-worthing.gov.uk>
Cc: Planning SE <planningse@highwaysengland.co.uk>, "Cleaver, Elizabeth" <Elizabeth.Cleaver@highwaysengland.co.uk>, "Pettyt, Thomas" <Thomas.Pettyt@highwaysengland.co.uk>

Dear Tracey,

Thank you for your email and attached letter of the 11th May advising Highways England of the Worthing Local Plan Issues and Options Consultation and inviting Highways England to comment.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the strategic road network.

We note that the OAN for the Borough is 636 dwellings per annum, a total of 12720 dwellings to be delivered over the life of the Local Plan between 2013-2033. This is quite a considerable number of new homes and along with employment, retail, educational development etc. to support such growth it is highly likely that even with careful transport planning and promotion / development of sustainable public transport infrastructure there are likely to be significant cumulative traffic impacts on the SRN in this case the A27 Trunk Road. It will therefore be essential to robustly model the transportation impacts of the local plan proposals and provide mitigation measures on the SRN where detrimental impacts are identified. It should be noted that where the network has capacity Highways England would not expect mitigation provided the cumulative impacts of the development did not cause the network to become over capacity. Where the network is already over capacity or would otherwise have been with normal background growth at the end of the local plan period mitigation to provide a no worse situation will be required. The Council should ensure that such mitigations are affordable and deliverable within the context of the local plan and that a robust funding mechanism is sought to ensure the cost of mitigation works will be covered by local plan development and/or other such available funding for growth.

Highways England is already working with the Council in dealing with several sites currently being brought forward which are included within the Issues and Options such as North of West Durrington, West of Fulbeck Avenue and Upper Brighton Road. We note that the council are considering several sites which were not previously identified in the core strategy and our view is that provided they subject to robust Transport

Assessment and the resulting impacts managed within the local plan context to ensure they are deliverable we would not be opposed to such.

Ultimately, the Local Plan must demonstrate that it's proposals are affordable and deliverable and for our part ensuring that the Strategic Road Network is carefully considered and that where mitigations are required they are agreed and included within the Local Plan and that an appropriate funding mechanism is found to pay for such mitigations at the appropriate times.

I trust that the above is of assistance to you at this stage in the Local Plan process and look forward to our continued involvement in its development as well as collaboratively working with the Council to achieve mutually beneficial outcomes.

Regards

David

David Bowie

Highways England Company Limited | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ | Registered in England and Wales No. 9346363

Mobile: [REDACTED]

Web: www.highwaysengland.co.uk

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Highways England Company Limited | General enquiries: 0300 123 5000
| National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park,
Birmingham B32 1AF | [https://www.gov.uk/government/organisations/highways-](https://www.gov.uk/government/organisations/highways-england)
[england](http://www.highwaysengland.co.uk) | info@highwaysengland.co.uk

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Consider the environment. Please don't print this e-mail unless you really need to.

REFERENCE

Comment number: WIO-M-90

Date received: 22/06/2016

Anthony
Heslehurst <anthony.heslehurst@thakeham.com>
to me

22 Jun (8 days ago)

Dear Sirs,

Please find attached representations to the consultation on the Worthing Local Plan Issues and Options document by and on behalf of Thakeham Homes Ltd.

If you could kindly acknowledge receipt of this submission, and if you require any further information then please do not hesitate to contact me.

Yours Sincerely

Anthony Heslehurst
Graduate Planner

Tel 01403 787300 | DD 01403 787388 | E anthony.heslehurst@thakeham.com

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THAKEHAM

Planning Policy Team
Worthing Borough Council
Portland House
44 Richmond Road
Worthing
West Sussex
BN11 1HS

22nd June 2016

Dear Sirs,

Worthing Local Plan Issues and Options consultation – Representations

Thakeham Homes Ltd are submitting representations to the Worthing Local Plan Issues and Options consultation as local stakeholders. We are a house builder based near Horsham with a proven track record for delivering high quality, sustainable schemes across Sussex, Surrey and Hampshire.

We have reviewed the material that the Council has published for consultation in the context of the relevant evidence base documents, and we are broadly supportive of the Vision and Objectives outlined within the Issues and Options Document. At this stage, it is clear that the Council are adopting a positive approach to the emerging plan, and we are particularly encouraged to see the National Planning Policy Framework (NPPF) presumption in favour of sustainable development included as a proposed policy within the document, reflecting its role as a golden thread running through the planning system.

We are aware that Worthing is a spatially constrained Borough with very little developable land when compared against other neighbouring Authorities, and that this has been exacerbated further by the creation of the South Downs National Park in 2011. With this in mind, we wish to make representations with regard to the urgent need for cooperation with neighbouring Authorities to deliver the development that the Borough needs over the plan period. We also wish to make comments in relation to proposed policies on affordable housing and design standards for new housing, to ensure that the Local Plan is aligned with the relevant national policy and guidance.

Duty to Cooperate (Question 9. Housing and Question 11. Edge of Town Development Sites)

National planning policy requires that Local Planning Authorities cooperate on planning issues that cross administrative boundaries, including the delivery of the full objectively assessed housing needs. This duty is primarily contained within Paragraphs 178-181 of the NPPF, which states the following:

“Local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans. Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for

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instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework."

NPPF, Paragraph 179

As noted above, Worthing is a spatially constrained Borough with limited developable land when compared against neighbouring Authorities. This is acknowledged within the consultation document, which describes the ability of Worthing to deliver its objectively assessed housing needs as 'very unlikely':

"Given the lack of available land within the Borough and significant environmental constraints it is highly unlikely that we will be able to achieve this [delivery of housing need] but it is now the role of the Local Plan review to assess what level of growth we can reasonably and sustainably provide for"

Worthing Local Plan Issues and Options, Page 21

We note that the consultation document does include an acknowledgement of the NPPF duty to cooperate, which is listed within the 'Key Challenges' relating to housing. The duty does not however feature in any of the consultation questions, and there are currently no indications of how the Council intend to collaborate with neighbouring Authorities in delivering its unmet housing need, which is likely to be very substantial given the housing sites identified so far. This is exacerbated by ongoing under delivery in the wider sub-region, including Brighton and Hove, which is itself highly constrained and has an estimated under supply of 16,920 dwellings in the plan period 2010-2030. Furthermore, the consultation document acknowledges the significant cross-boundary planning relationship with other Authorities, noting in the Key Facts on Page 8 that 'most people move to Worthing from Adur or Brighton'.

As such, we consider it to be critical that the Council cooperate with neighbouring Authorities to help address some of its unmet housing needs, in particular Arun District, which is subject to a suspended Local Plan Examination, and the SDNP which is currently in the process of preparing its Pre Submission Local Plan following Preferred Options consultation in the Spring.

There is potential ability within larger Districts such as Arun, as well as the SDNP, to provide much needed housing, therefore we expect to see a clear and concerted effort on all sides to find a solution, in accordance with the NPPF duty to cooperate.

With regard to Question 11 concerning edge of town development sites, we consider that given the spatial constraints facing the Borough, the Local Plan should also consider the potential for release of a much wider range of edge-of-settlement sites throughout the Borough to assist with meeting the full objectively assessed housing needs.

Affordable Housing (Question 12. Planning Policies)

We note that the consultation document includes affordable housing within the list of likely planning policies for the emerging Local Plan. As mentioned above, the central thrust of Government policy is on increasing the supply of housing and meeting the objectively assessed housing needs of the area. A significant part of this is to ensure that there are sufficient and adequate housing types and tenures to address the needs of each community.

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Within recent months, affordable housing has experienced a number of significant changes, most notably following the Housing and Planning Act, which placed a requirement on Local Planning Authorities to promote starter homes on new proposals for residential development.

The Department for Communities and Local Government (DCLG) technical consultation launched on 24th March 2016 also outlined a requirement for 20% starter homes on schemes of 10 or more units or on sites 0.5 hectares in size, provided that it would not make schemes unviable.

In accordance with the NPPF tests for soundness, affordable housing policies need to be consistent with national policy, effective to ensure delivery over the plan period, and flexible enough to deal with changing circumstances. As the plan progresses and policies are developed therefore, we consider it important that policies relevant to the supply of affordable housing should be flexible enough to allow the delivery of the Government's starter homes, which are a key component of affordable housing.

Design Standards (Question 12)

The list of policies expected to be included within the Local Plan includes Housing Mix and Quality, which lists adherence to national minimum space standards among its aims and intentions.

National Planning Practice Guidance (NPPG) states that where a Local Planning Authority wish to require internal space standards, they should only do so by reference within the Local Plan to the Nationally Described Space Standard, which came into effect on 1st October 2015. The NPPG at paragraph 56-020 states that when considering whether to apply the national standards, Local Planning Authorities should take account of the following areas:

- **need** – *evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.*
- **viability** – *the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.*
- **timing** – *there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.*

National Planning Practice Guidance, 56-020

In accordance with the NPPG, national minimum space standards can therefore only be applied through a Policy in a Local Plan where the Local Planning Authority has demonstrated through evidence that there is a need for space standards and that viability is not compromised. As such, any policy in the emerging Worthing Local Plan which intends to require compliance

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with the Nationally Described Space Standard must be supported by clear evidence of need, viability and timing.

Conclusions

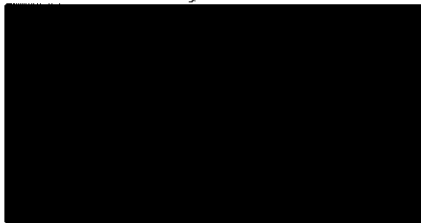
Thakeham supports the ongoing work on the Worthing Local Plan and is grateful for the opportunity to participate in this early consultation. We are encouraged by the generally positive approach that has been taken with the identification of a number of sites throughout the District. In order for the plan to meet the tests for soundness and to provide the full objectively assessed housing needs however, we consider that further work is required with regard to the identification of additional sites, particularly in sustainable edge-of-settlement locations.

We consider that the importance of the duty to cooperate is heightened by the constrained nature of the District with respect to its boundaries following the creation of the South Downs National Park. There is also substantial existing unmet need in other coastal authorities, most notably Brighton and Hove, which in our view underscores the need to cooperate with other authorities, including Arun and the SDNP to help accommodate some of this need.

In the formulation of planning policies, we wish to see a robust evidence-based approach adopted by the Council, in particular where nationally described space standards are pursued then this should be supported by clear evidence showing a demonstrable local need.

We trust that these representations have been useful and informative, and should you have any questions relating to this submission then please do not hesitate to contact me.

Yours Sincerely



Anthony Heslehurst
Graduate Planner

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Comment number:

Date received:

Your Town - Your Future

A new Local Plan for Worthing Consultation Document May 2016 Comments Form

Worthing Borough Council has started work on preparing a new Local Plan which will have a big influence on the town in the period up to 2033. The publication of the 'Your Town - Your Future' consultation document provides the first opportunity to comment on relevant issues and options.

This consultation runs from 11th May to 22nd June 2016

Website: www.adur-worthing.gov.uk/worthing-local-plan

Email: please email this completed form to worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council,
Portland House, 44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	Anthony		
Last name	Heslehurst		
Organisation (where applicable)	Thakeham Homes Ltd		
Address line 1	Thakeham House, Summers Place		
Address line 2	Stane Street		
Address line 3	Billingshurst		
Postcode	RH14 9GN	Telephone	01403 787 300
Email address	Anthony.heslehurst@thakeham.com		

You can respond to this consultation online or by email. However, if your preference is to make comments manually this form can be photocopied as many times as necessary.

To keep you informed on progress all respondents will be added to the Worthing Planning Policy consultee database unless you request otherwise.

Use of information: Names and comments we receive will be available for public inspection and may be reported publicly as part of the Local Plan process. Contact details will not be published. Further information about how personal information is processed can be found on the Council's website. Unfortunately we cannot accept or report confidential or

anonymous responses. All data will be stored securely in line with the Data Protection Act 1998.

Section B - Comments

The consultation document summarises issues and options within thematic sections. General comments can be inserted in the box below and comments about specific sections of the Plan can be made in response to some key questions that follow.

Please see attached representations relating to Question 9, 11 and 12.

VISION

Q1a - Do you agree with the Vision we are aiming and aspiring to achieve?

Q1b - Does it provide a clear direction for the Worthing Local Plan?

Q1c - Is there anything you think we have missed which you would like to see incorporated in the Vision?

STRATEGIC OBJECTIVES

Q2a - Do you agree with the proposed objectives set out above? If not, what changes would you like to see?

Q2b - Are the objectives sufficiently distinctive and locally specific?

ECONOMY

Q3a - Do you agree with the key challenges identified for the economy? Are any missing?

take a positive approach and look to bring forward these sites in advance of the adoption of the new Local Plan?

Please see attached representations

PLANNING POLICIES

Q12a - Do you have any views on how any of the listed policies should be worded?

Q12b - Are there any policies missing from the list?

Q12c - Are all of the listed policies required?

Please see attached representations

Please continue on separate sheets as necessary

Name:	Anthony Heslehurst	Signature	
Date:	22.06.2016		

REFERENCE

Comment number: WIO-M-91

Date received: 22/06/2016

Hello,

John Tripcony ([REDACTED]) has sent you an enquiry from the Adur & Worthing Councils website. The page they sent the message from was:

<http://www.adur-worthing.gov.uk/worthing-local-plan/consultation/>

Account / Reference number (if supplied):

Postal address (if supplied):

Contact telephone (if supplied):

Their enquiry was:

I understand the Council is considering planning arrangements for extra housing in Worthing and appreciate your problem in finding new sites and giving sanction to the development of existing properties, which has caused me to draw your attention to and seek your care for an historic building - High Salvington Windmill.

This mill, built about 1760 on the site of an earlier mill which existed in 1615 (400 years!) has been owned by the Council for some time and was a total wreck and a dangerous structure when taken over by a group of volunteers in 1976. It is now a totally restored and working mill and, until the recent boundary changes was the only working mill in West Sussex and this what attracts so many visitors.

I wrote a letter, dated 14.12.2014, to the Senior Planning Officer objecting to the building of a very large garage at No. 1 Furze Road wherein I listed the schools, youth organisations and other local clubs etc. who had visited the mill and who, together with public open days, had attracted nearly 5000 visitors during the year.

This month 80 young children from the Durrington First School were shown around the building and saw it working and next week 90 children will be coming from The Vale School - the main attraction is the fact people can see the mill working, a silent motionless structure would not create the same interest and the number of visitors would decline.

It is for this reason we would ask the people on the planning panel to carefully consider any proposed new development or extensions to existing properties close to the mill which might obstruct the visual aspect and/or the natural wind flow which drives the sails that makes this Council property so attractive to local people and visitors alike. Thank you.

Please reply to this email.

Thank you.

REFERENCE

Comment number: WIO-M-92

Date received: 22/06/2016

daniel.wiseman <daniel.wiseman@wyg.com>

22 Jun (8 days ago)

to me

Dear Sir/Madam

I attach a completed Comments Form in respect of the Worthing Local Plan : Your Town – Your Future consultation that ends today.

I submit this form on behalf of our client Mapeley Estates Limited who own the Inland Revenue Offices Site on Barrington Road in Durrington.

The comments on the form should be self-explanatory; but if you should have any queries, please do not hesitate to contact me.

Best regards

Dan

Daniel Wiseman
Associate Director

WYG

The Pavilion, 1st Floor, Botleigh Grange Office Campus, Hedge End, Southampton, Hampshire, SO30 2AF

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Comment number:

Date received:

Your Town - Your Future
A new Local Plan for Worthing
Consultation Document May 2016
Comments Form

Worthing Borough Council has started work on preparing a new Local Plan which will have a big influence on the town in the period up to 2033. The publication of the 'Your Town - Your Future' consultation document provides the first opportunity to comment on relevant issues and options.

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Website: www.adur-worthing.gov.uk/worthing-local-plan

Email: please email this completed form to worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council,
Portland House, 44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	Daniel		
Last name	Wiseman		
Organisation (where applicable)	WYG		
Address line 1	1 st Floor, The Pavillion, Botleigh Grange Office Campus		
Address line 2	Hedge End		
Address line 3	Southampton		
Postcode	SO30 2AF	Telephone	023 8202 2800
Email address	daniel.wiseman@wyg.com		

You can respond to this consultation online or by email. However, if your preference is to make comments manually this form can be photocopied as many times as necessary.

To keep you informed on progress all respondents will be added to the Worthing Planning Policy consultee database unless you request otherwise.

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Section B - Comments

The consultation document summarises issues and options within thematic sections. General comments can be inserted in the box below and comments about specific sections of the Plan can be made in response to some key questions that follow.

WYG are appointed as planning agents for Mapeley Estates Limited who own the Inland Revenue Office Site on Barrington Road in Durrington.

VISION

Q1a - Do you agree with the Vision we are aiming and aspiring to achieve?

The general tone of the Vision is agreed and supported.

Q1b - Does it provide a clear direction for the Worthing Local Plan?

The Vision acknowledges that Worthing has limited land resources, and states that "limited land resources will have been developed in the most efficient way". The Vision also seeks to "maximise the delivery of the widest range of identified needs, whilst at the same time ensuring that the Borough's intrinsic character and its beach and countryside setting have been protected and enhanced". The Vision does not however mention matters of density and sustainability.

Q1c - Is there anything you think we have missed which you would like to see incorporated in the Vision?

We consider that reference should be made to increased density at key sustainable locations; which should be seen as a positive planning tool that can focus development to more urban locations thereby reducing pressure on land around the town in the countryside.

STRATEGIC OBJECTIVES

Q2a - Do you agree with the proposed objectives set out above? If not, what changes would you like to see?

We agree with the Strategic Objectives with regards to 'Community' and 'Environment'. We have concerns however with regards to the 'Economy' Objective which states that "The Local Plan will: retain and enhance key employment areas". We are concerned that there is insufficient flexibility within the approach to 'retain and enhance' key employment areas. We are not aware of any consultation carried out by the Council with owners of the 'Key Employment Areas' to understand their performance, viability, strengths, weaknesses, opportunities and likely threats.

Q2b - Are the objectives sufficiently distinctive and locally specific?

We consider that the objectives are high level in their content, Borough-wide and generic; the objectives do not readily reflect planning matters at the sub-area level and do not appear to acknowledge individual matters that affect individual sites. This may result in objectives that cannot be delivered and do not have local support.

ECONOMY
Q3a - Do you agree with the key challenges identified for the economy? Are any missing?
The Worthing Economic Research and Employment Land Review, Final Report, April 2016 prepared by Nathaniel Lichfield and Partners (NLP) advises that there is an issue in terms of the viability of bringing forward new office schemes in the Borough, with uncertain levels of demand and low values*. The fragile state of the commercial property market, as expressed by NLP is not clearly set out as a key challenge for the economy.
Q3b - Should the Local Plan continue to protect key employment areas or should it be more flexible in its approach?
Flexibility is key in regeneration. Market forces change during the life of Local Plans in ways that are always unforeseen. Restrictive policies must be resisted if development is to come forward during the plan period.
Q3c - In addition to the sites already identified as having the potential to deliver employment land are there any other sites that could accommodate employment growth?
The Issues and Options Consultation Document appears to ignore the significant potential of the town centre to deliver new development that can accommodate employment growth.
RETAIL AND THE TOWN CENTRE
Q4a - Have all the key challenges for retail areas and the Worthing town centre been identified, if not what has been missed?
The challenge of high levels of empty commercial floorspace in the town centre, particularly on upper floors, and an understanding of the reasons for this high level of vacancy has not been expressed.
Q4b - Are retail centres functioning well - how can they be improved?
We have no specific comments relating to the current performance of the retail centres.
Q4c - How could new development in the town centre enhance the town's identity and attract more visitors?
Employment generating uses in town centres contribute to a vibrant town centre, and help to bolster the need for, and success of a variety of shops, cafes, bars and restaurants that in turn help to increase patronage of the town centre. This approach is recognised by Government in national planning policies as the 'Town Centres First' approach.
TOURISM
Q5a - Have the key challenges for tourism been addressed?
We do not wish to make comments regarding tourism.
Q5b - In what ways can the tourism offer be improved?
COMMUNITY AND LEISURE FACILITIES
Q6a - Do you agree with the main challenges identified in planning for the provision of different infrastructure needs? Are any missing?
We do not wish to make comments regarding community and leisure facilities.
Q6b - Do you have suggestions for how the Local Plan could resolve these?
Q6c - Are you aware of any particular community and leisure needs?

TRANSPORT
Q7a - Do you agree with the main challenges identified? Are any missing?
We have no specific comments to make regarding the transport challenges identified.
Q7b - Do you have any suggestions for how the Local Plan could better promote sustainable transport?
We feel that the Local Plan should acknowledge the importance of rail travel and the need to increase densities of development near transport hubs.

ENVIRONMENT
Q8a - Do you agree with the main environmental challenges identified? Are any missing?
We do not wish to make comments regarding the environment.
Q8b - Do you have any suggestions for how the Local Plan could reach a balance between competing needs?
Q8c - Are there any circumstances you consider where regardless of mitigation, development would be inappropriate?
Q8d - What value do you place on the borough's green spaces, particularly those around the town?

HOUSING
Q9a - Should housing delivery be given higher priority than other development needs (e.g. employment land, community facilities)?
There is a chronic and urgent need for new homes to be delivered in the Borough. It is apparent that housing delivery should be prioritised. Furthermore, housing growth will in turn lead to greater need for employment space, and this would be expected to result in an increase in the viability of projects that seek commercial floorspace.
Q9b - How should we best address specialist housing needs (e.g. affordable housing, family housing, self-build housing, sheltered & extra care, houses in multiple occupation)?
Flexibility is key. It is important that market demand is allowed to influence housing provision. Policies must be flexible in their approach to ensure that specialist housing needs are met.
Q9c - Efficient use of land will help to raise densities and will contribute towards meeting development needs. What potential impacts of this should the Council try to mitigate?
The Council needs to promote higher densities in a positive manner with an emphasis on high quality development that helps to create vibrant places to meet an urgent need.
Q9d - Should the Council include a policy that would resist the inappropriate development of residential gardens?
Planning applications involving the development of residential gardens should be considered on their merits. In some circumstances, infill development and the development on former large gardens can help to meet the wider objectives of a Local Plan. A blanket ban or restrictive policy would simply stifle development in the Borough and is not a positive approach.

DEVELOPMENT OPTIONS WITHIN THE TOWN
Q10a - Do you agree that the sites listed above provide the most significant redevelopment and regeneration opportunities to deliver housing, employment and leisure uses within the town?
We are not familiar with all of the sites referred to and we have not carried out a review of potential sites. We are very familiar with Area of Change 7 – Martletts Way and Area of Change 9 – HMRC Offices, Barrington Road. We note that these two areas of change are heavily constrained in terms of their location, accessibility, viability and potential for land contamination. We agree that these two Areas of Change are important sites, and in principle they could be

redeveloped; but the Council needs to understand that the sites are challenging sites and may not come forward for redevelopment if policies are too restrictive.

Q10b - Do you have any particular comments on how any of the identified sites should be developed and for what mix of uses?

Area of Change 9 is located in a highly sustainable location with good transport links, including rail links to the wider area. A high density residential development should be sought to meet the Borough's housing needs. In our opinion, and based on our involvement with the site; residential development is required to ensure that the development of the site is viable.

Q10c - Are there any other potential development sites within the current built up area that should be assessed?

We have not carried out a review of other potential development sites.

EDGE OF TOWN DEVELOPMENT OPPORTUNITIES

Q11a - Given the housing needs in the Borough do you have any views as to which of these sites should be developed or protected?

We have no specific comments to make regarding edge of town development opportunities.

Q11b - If any of these sites (in full or in part) are to be allocated for development do you have any views on how they should be developed?

Q11c - If any of these sites are not allocated for development do you have any views on how they should be protected, enhanced or used?

Q11d - Land West of Fulbeck Avenue (site 7) and Land north of West Durrington (site 8) are already within the Built Up Area boundary. In light of significant housing needs should the Council take a positive approach and look to bring forward these sites in advance of the adoption of the new Local Plan?

PLANNING POLICIES

Q12a - Do you have any views on how any of the listed policies should be worded?

We reiterate our concerns that planning policies need to be positively prepared and flexible in their approach to ensure that the Local Plan can respond to changing market forces; rather than hinder development and prevent development sites from coming forward.


Q12b - Are there any policies missing from the list?

It is difficult to ascertain what policies will be created in the Local Plan. For example 'education' is not specifically mentioned; but an education policy could be created within the themes of infrastructure and sustainable communities. We will review the emerging Local Plan when it is published for consultation and make further comments.

Q12c - Are all of the listed policies required?

We consider that the 'Protecting and Enhancing Existing Employment Sites' policy could be harmful to the wider objectives of the Plan if worded in a restrictive manner.

Please continue on separate sheets as necessary

Name:	Daniel Wiseman	Signature	
Date:	21 June 2016		

REFERENCE

Comment number: WIO-M-93

Date received: 22/06/2016

22 Jun (8 days ago)


to me

Please

Find attached your form duly completed

However it should be noted that it does not contain a signature as I do not have an electronic version

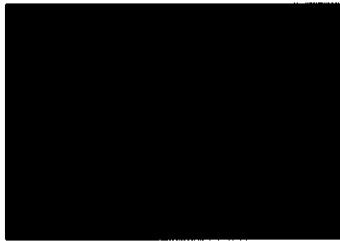
I should also note that your switchboard closed at 16:55 - not 17:00 as stated by your automated reply system

Yours

Prof. Bryan R.M.Manning

Visiting Professor in Cross-Sectorial Behavioural Compunetics Research,

Home Address:



Your Town - Your Future

**A new Local Plan for Worthing
Consultation Document May 2016
Comments Form**

Worthing Borough Council has started work on preparing a new Local Plan which will have a big influence on the town in the period up to 2033. The publication of the 'Your Town - Your Future' consultation document provides the first opportunity to comment on relevant issues and options.

This consultation runs from **11th May to 22nd June 2016**

Website: www.adur-worthing.gov.uk/worthing-local-plan

Email: please email this completed form to worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council,
Portland House, 44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	Bryan		
Last name	Manning		
Organisation (where applicable)	Visiting Professor, University of Westminster		
Address line 1	[REDACTED]		
Address line 2	[REDACTED]		
Address line 3			
Postcode	[REDACTED]	Telephone	[REDACTED]
Email address	[REDACTED]		

You can respond to this consultation online or by email. However, if your preference is to make comments manually this form can be photocopied as many times as necessary.

To keep you informed on progress all respondents will be added to the Worthing Planning Policy consultee database unless you request otherwise.

Use of information: Names and comments we receive will be available for public inspection and may be reported publicly as part of the Local Plan process. Contact details will not be published. Further information about how personal information is processed can be found on the Council's website. Unfortunately we cannot accept or report confidential or anonymous responses. All data will be stored securely in line with the Data Protection Act 1998.

Section B - Comments

The consultation document summarises issues and options within thematic sections. General comments can be inserted in the box below and comments about specific sections of the Plan can be made in response to some key questions that follow.

--

VISION

Q1a - Do you agree with the Vision we are aiming and aspiring to achieve?

Broadly – Inward economic investment could be problematic

Q1b - Does it provide a clear direction for the Worthing Local Plan?

In very general non-specific terms

Q1c - Is there anything you think we have missed which you would like to see incorporated in the Vision?

Impossible to say without access to the details

STRATEGIC OBJECTIVES

Q2a - Do you agree with the proposed objectives set out above? If not, what changes would you like to see?

Worthy, but inevitably short on detail and impact

Q2b - Are the objectives sufficiently distinctive and locally specific?

Sensible, but balance between infrastructure aims and viability questionable

ECONOMY

Q3a - Do you agree with the key challenges identified for the economy? Are any missing?

Economic value imbalance between local and “exported” resident expertise needs positive action.

Q3b - Should the Local Plan continue to protect key employment areas or should it be more flexible in its approach?

Needs to focus on attracting high value innovation expertise into an attractive environment

Q3c - In addition to the sites already identified as having the potential to deliver employment land are there any other sites that could accommodate employment growth?

Probably – High-value SME’s need office/lab space rather than industrial premises

RETAIL AND THE TOWN CENTRE

Q4a - Have all the key challenges for retail areas and the Worthing town centre been identified, if not what has been missed?

Increasing rate of closures demonstrates a mismatch between customers and providers interests

Q4b - Are retail centres functioning well - how can they be improved?

Patently not. The central area lacks the bustling, innovative image of a "true/traditional" town

Q4c - How could new development in the town centre enhance the town's identity and attract more visitors?

With difficulty – without attracting businesses that project an attractive, innovative and novel image

TOURISM

Q5a - Have the key challenges for tourism been addressed?

Partially. The "vision" and how to achieve is missing, and thus loses credibility

Q5b - In what ways can the tourism offer be improved?

By practical innovations that enhance/re-create what is being lost

COMMUNITY AND LEISURE FACILITIES

Q6a - Do you agree with the main challenges identified in planning for the provision of different infrastructure needs? Are any missing?

Yes. Community well-being depends on sensitive enhancement of existing facilities

Q6b - Do you have suggestions for how the Local Plan could resolve these?

Would need access to greater details – e.g social, leisure and recreational community dynamics

Q6c - Are you aware of any particular community and leisure needs?

Possibly. Better intergenerational interests/interaction

TRANSPORT

Q7a - Do you agree with the main challenges identified? Are any missing?

Yes. But capacity issues are the biggest issues

Q7b - Do you have any suggestions for how the Local Plan could better promote sustainable transport?

Not off-hand without access to detailed population dynamics data

ENVIRONMENT

Q8a - Do you agree with the main environmental challenges identified? Are any missing?

Flood risk emergency potential is unacceptably high – e.g Goring Way evacuation from Ferring

Q8b - Do you have any suggestions for how the Local Plan could reach a balance between competing needs?

The Goring Gap issue needs to be resolved by integration into the South Downs National Park

Q8c - Are there any circumstances you consider where regardless of mitigation, development would be inappropriate?

Install automatic flood run-off barrier to Rife in North Goring Gap agricultural land south of A259

Q8d - What value do you place on the borough's green spaces, particularly those around the town?

Vey high – if residential well-being is to sustained/improved

HOUSING

Q9a - Should housing delivery be given higher priority than other development needs (e.g. employment land, community facilities)?

No. Not without turning Worthing into a dormitory, with massive transport overloads

Q9b - How should we best address specialist housing needs (e.g. affordable housing, family housing, self-build housing, sheltered & extra care, houses in multiple occupation)?

With considerable care. Whilst HMO's are valuable, they can easily become ASB problems

Q9c - Efficient use of land will help to raise densities and will contribute towards meeting development needs. What potential impacts of this should the Council try to mitigate?

Raised densities raise social stress. Infrastructure and recreation are key mitigation issues

Q9d - Should the Council include a policy that would resist the inappropriate development of residential gardens?

Yes. Handled delicately, working WITH residents to take pleasure/pride in their spaces is key

DEVELOPMENT OPTIONS WITHIN THE TOWN

Q10a - Do you agree that the sites listed above provide the most significant redevelopment and regeneration opportunities to deliver housing, employment and leisure uses within the town?

Yes. Provided that that they are designed to complement the townscape environment

Q10b - Do you have any particular comments on how any of the identified sites should be developed and for what mix of uses?

Not without access to detailed proposals

Q10c - Are there any other potential development sites within the current built up area that should be assessed?

No sufficiently aware to comment positively

EDGE OF TOWN DEVELOPMENT OPPORTUNITIES

Q11a - Given the housing needs in the Borough do you have any views as to which of these sites should be developed or protected?

Outer areas should only be developed to contribute to the environment – not destroy it further

Q11b - If any of these sites (in full or in part) are to be allocated for development do you have any views on how they should be developed?

Yes. True – as opposed to Statistical Need should be validated and density tightly controlled

Q11c - If any of these sites are not allocated for development do you have any views on how they should be protected, enhanced or used?

Yes. "Green" environment corridors towards the centre are essential for residential well-being

Q11d - Land West of Fulbeck Avenue (site 7) and Land north of West Durrington (site 8) are already within the Built Up Area boundary. In light of significant housing needs should the Council take a positive approach and look to bring forward these sites in advance of the adoption of the new Local Plan?

Only if need is properly measured and validated – and then justified

PLANNING POLICIES

Q12a - Do you have any views on how any of the listed policies should be worded?


Some reworking might improve it somewhat
Q12b - Are there any policies missing from the list?
Inevitably without access to more detail and time
Q12c - Are all of the listed policies required?
Broadly yes

Please continue on separate sheets as necessary

Name:	Prof. Bryan Manning	Signature	
Date:	22rd June 2016		

Some reworking might improve it somewhat
Q12b - Are there any policies missing from the list?
Inevitably without access to more detail and time
Q12c - Are all of the listed policies required?
Broadly yes

Please continue on separate sheets as necessary

Name:	Prof. Bryan Manning	Signature	
Date:	22rd June 2016		

REFERENCE

Comment number: WIO-M-94

Date received: 22/06/2016

swtconservation@sussexwt.org.uk

22 Jun (8 days ago)

to me

Please find attached the Sussex Wildlife Trust's response to the Worthing Local Plan Issues and Options Consultation.

Kind regards

Jess Price

Conservation Officer

<<SWT Response to Your Town Your Future June 2016.pdf>>

www.sussexwildlifetrust.org.uk



Sussex
Wildlife Trust

By email only to:
worthinglocalplan@adur-worthing.gov.uk

Contact: Laura Brook
Direct Dial: 01273 497508
E-mail: swtconservation@sussexwt.org.uk
Date: 20/06/16

The following comments are made on behalf of the Sussex Wildlife Trust in relation to the Worthing Local Plan 'Your Town - Your Future' Consultation Document (2016).

Q1: Vision

c) The Sussex Wildlife Trust supports the use of 'protecting and enhancing' however we feel that 'countryside setting' is too ambiguous. As it stands, the Vision does not set a clear ambition to ensure that the Environmental dimension of sustainable development is achieved through the Local Plan. The Vision needs to incorporate a greater commitment to the Natural Environment. We recommend that is amended as follows:

Limited land resources will have been developed in the most efficient way to maximise the delivery of the widest range of identified needs, whilst at the same time ensuring that the Borough's intrinsic character and natural environment, including the beach, have been protected and enhanced...

Additionally we would encourage the use of specific environmental terminology such as:

The Borough's natural capital will have been increased by protecting and enhancing biodiversity through an integrated green infrastructure approach.

This would reflect the aims of the National Planning Policy Framework (NPPF) for us to move from no net loss of biodiversity towards achieving net gains in biodiversity (Paragraphs 9 and 109). This would also ensure that the Worthing Local Plan complemented the objectives of Adur's Plan (please see our comments for Q2 below).

Woods Mill, Henfield, West Sussex BN5 9SD
01273 492630 enquiries@sussexwt.org.uk sussexwildlifetrust.org.uk

President: David Streeter MBE Chairman: Carol Nicholson Chief Executive: Dr. Tony Whitbread

Sussex Wildlife Trust is a company limited by guarantee under the Companies Act. Registered in England, Company No. 698851. Registered Charity No. 207005. VAT Registration No. 191 305969. Registered Office: Woods Mill, Henfield, West Sussex BN5 9SD

Q2: Strategic Objectives

a) We welcome the vital inclusion of the environment within the strategic objectives, but would like to see the Local Plan reflect the details of Objective 1 in the 2011 Core Strategy. The objectives listed in the consultation document are much vaguer and do not include sufficient commitment to achieving a net gain in biodiversity.

We recommend the following changes to the wording of the environmental strategic objectives:

In the first bullet point remove the wording '*where possible*' so the bullet point reads '*protect and enhance valued green space*'

We would also recommend additional objectives to demonstrate that the Local Plan will result in:

- 'Net gains to biodiversity' reflecting NPPF paragraph 109
- 'The creation, protection and enhancement and management of networks of biodiversity and green infrastructure' as per NPPF paragraph 114

The plan should ultimately be aiming to increasing the Borough's natural capital.

We recommend that the above points are incorporated into Worthing's Strategic Objectives by the addition of the following bullet points:

- Add to the Borough's natural capital by ensuring that development delivers net gains to biodiversity.
- Set out a strategic approach in order to plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure

The above would be in line with the stated requirements of the 'What the Local Plan must do' section of the Environmental Key Issues (page 20 of the consultation document).

The Trust would like to see Worthing Local Plan reflect the wording of Objective 6 within the emerging Adur Local Plan, which highlights Adur District Council's commitment to Natural Capital:

*'Adding to natural capital by improving biodiversity, recreation and leisure facilities in order to provide an interlinked network of multifunctional open spaces (within the context of a Green Infrastructure strategy) - through and from urban areas (including Shoreham Harbour) to the coast and countryside, the provision of open space and greater opportunities for (and access to) informal recreational uses within the **countryside and** Local Green Gaps. Public access to the National Park and other countryside assets will be improved'*

Due to the close working nature of both authorities, great strides could be taken in delivering net gains in natural capital from collaborative working. This would also demonstrate how the duty to co-operate could lead to really positive outcomes for biodiversity.

Q8: Key Issues - Environment

The consultation document consistently recognises the constraints on the Borough and particularly the pressures that the OAHN could put on it. Therefore the Local Plan's commitment to the environment needs to be strong and in particular, recognise the need to increase natural capital in order to truly deliver sustainable growth.

The Trust feels that whilst there are some good points in the 'What the Local Plan must do' section, it does not currently reflect the full requirements of Chapter 11 of the NPPF. In particular the Local Plan should be aiming to achieve net gains in biodiversity.

We therefore recommend that an additional requirement for the plan should be to:

'Ensure that developments create and enhance networks of green infrastructure and result in a net gain in biodiversity'

a) The key challenges section is missing any acknowledgement of the challenge of valuing and protecting the Borough's green spaces and green gaps given the pressure for development.

We would therefore recommend an additional Key Challenge to the effect of:

Ensuring the Borough's green spaces are adequately valued and protected both for their individual value and that of the value they have as a collective in delivering towards the Borough's natural capital.

This would align with bullet point seven in the 'What the Local Plan must do' section.

The Trust objects to the commitment to only 'no net loss of biodiversity' in Key Challenge point 5. As stated above the Local Plan must aim to achieve net gains for nature.

c) The Trust considers that any development that is unable to achieve net gains to biodiversity would always be inappropriate. We would also object to any development proposal that did not include up-to-date information about the ecological value of the site. We therefore recommend that the Local Plan includes policy wording to ensure that net gains and up-to-date environmental information are both a requirement of development. This would be in line with paragraphs 9, 109, 118 and 158 of the NPPF.

d) The Local Plan needs to recognise the importance of green sites for the multifunctional benefits they can deliver through green infrastructure. A 'green site' does not have to have a designation attached to it to make it of value to the Borough's natural capital.

All the small areas of green spaces from road verges through to green squares within housing developments form part of the Borough's natural capital and offer or have the potential to deliver benefits from flood alleviation, nutrient cycling, health and recreation benefits, alongside delivering biodiversity value. The Local Plan should not simply protect the obvious designated site, but should achieve a holistic approach to the protection of the Borough's natural capital assets. A greater recognition of the need to embed this approach into the plan should be demonstrated.

Policy 14 of the 2011 Core Strategy states the Council's commitment to producing a green infrastructure SPD, as far as we are aware this has not been produced. We would encourage a renewed sense of urgency in producing a green infrastructure strategy and would welcome a commitment to a GI SPD in a future policy.

Q9: Key Issues – Housing

c) The revised housing evidence base for the Local Plan indicates that the level of housing need in the Borough is considerably higher than what is currently planned for in the adopted Core Strategy. Whilst the text indicates that it is unlikely that the plan will be able to deliver the predicted need, this increase in suggested growth highlights the imperative nature of assessing the Borough's natural capital to ensure capacity is available to facilitate sustainable growth.

d) Given the urban area that this plan represents, we feel it is imperative that the Council adopts a policy to protect gardens. The consultation document highlights the urban nature of the plan area, as a result gardens both front and back offer vital stepping stones within a green network.

By including a policy on inappropriate garden development you would be conforming to paragraphs 48 and 53 of the NPPF. Alongside this it would set out a case for demonstrating the importance of gardens for biodiversity in urban areas.

Given that the consultation document highlights key challenges for a number of sectors including the environment, the Trust would like to see the next round of consultation include information on how the Council intend to approach these challenges. Otherwise the consultation document simply highlights some very legitimate concerns, without a proactive approach to how they can be overcome within the lifetime of the Local Plan.

Q10: Development Options within Town

While the majority of these sites have already been identified through the 2011 Core Strategy process, we take this opportunity to remind the Council that the development of these sites should be now be delivering towards the aims of the NPPF and therefore achieving a net gain in biodiversity.

Policies for these sites could be strengthened in the proposed plan by the Council having a Green Infrastructure Strategy in place. As a result we would be able to see where the sites fit within the overall strategy and the amount of gains and types of gains that should be sought, to deliver the best value for the boroughs natural capital assets.

Q11: Edge of Town Development Opportunities

We are very pleased to see the up to date ecological survey work within the evidence base for proposed site allocations. This demonstrates commitment to section 40 of the NERC Act 2006 and a recognition of the sentiments of NPPF paragraph 158. We encourage the Council to ensure that the approach remains at the heart of the decision making process as the plan progresses.

The Trust would like to see all further information requirements listed in the Preliminary Ecological Reports for each of the sites carried out before any decisions on allocations are made.

Q12: Planning Policies

a) The Sussex Wildlife Trust would be keen to submit views on the wording of policies relating to the natural environment when they are presented for consultation. We take this opportunity to remind the council of the key points within chapter 11 of the NPPF and how these should be integral to the development of local plan policy. In particular any policies should:

- *'plan for biodiversity at a landscape-scale across local authority boundaries*
- *identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation'*
- *'promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan'* (NPPF paragraph 117).

We would like to see policies that include a requirement for developments to achieve net gains to biodiversity and contribute to Worthing's ecological network (NPPF paragraph 109).

The Trust would also recommend policy wording to protect locally designated sites and priority habitats with an aim that they should be protected and enhanced.

We would encourage any biodiversity policy to include mention of Worthing beach and the marine environment. The Council should look for opportunities to improve the connection between people and the marine environment in order to protect and enhance it.

b) The Trust would like to see the following additional policies included within the Local Plan:

Policy on the Green Gap (NPPF paragraphs 99 and 114)

Policy on the inappropriate development residential gardens (NPPF paragraphs 48 and 53)

Policy on the protection of Ancient Woodland and trees (NPPF paragraph 118)

We also assume that there will be site specific policies for any sites selected for development. These should include the requirement for net gains to biodiversity and up-to-date ecological information. The Trust would also support the inclusion of suggestions for the site-specific biodiversity enhancements that would be required for a development proposal on each site to be acceptable. These should be based on the Council's ecological evidence base, in particular the recommendations included in the Preliminary Ecological Reports for each of the sites.

Please do not hesitate to contact us about any of the above points.

Yours sincerely

Laura Brook
Conservation Officer

REFERENCE

Comment number: WIO-M-95

Date received: 22/06/2016

Pat Anderson <pat@jubilee-church.co.uk>

22 Jun (8 days ago)

to me

Dear Sirs,

Please find attached a letter response to the WLP consultation document, a hard copy will also be delivered to the council office today before close of business.

yours faithfully



Jubilee Community Church
Pilgrim House - 51-53 St Dunstan's Road
Worthing - West Sussex - BN13 1AA

Tel: 07767 115943

Email: office@jubilee-church.co.uk

Church website: jubilee-church.co.uk

Joint website: thinkinc.org.uk

22nd June 2016

Dear Sir/Madam

Thank you for the opportunity to contribute towards the new Worthing Local Plan (WLP).

We are submitting our comments in letter form as the online document doesn't really enable us to respond as we should like. We have also submitted a joint response with 3 other local churches.

Our primary concern is one of the value placed on Community and Spiritual Life. As the town grows and develops there could be a tendency to focus heavily on the development of the economic and commercial needs of the town, and have the development of Community Life and Wellbeing as lesser factors.

We would ask that as the WLP goes forward it contains more provision for this, including a flexible view on the potential to change the use of Buildings and/or land in circumstances where doing so could be seen to serve the good of the Community and contribute to Community cohesion and Wellbeing.

With it's lack of flexibility regarding the potential for Change of Use Worthing would seem to be reluctant to recognise the need for those organisations within the town seeking to enhance Community and Spiritual Life to have space from which to serve the community. This includes but is not exclusively the needs of the many vibrant churches within the town, all of whom are actively seeking to serve their communities and enhance the experience of life within the town.

We would ask that officers consider this and work to make more provision within the WLP for churches seeking to provide a forward thinking WLP that reflects the commitment of all parties in working together for the good of the town, and removes obstructions to a flexible approach where this is warranted.

We would ask in particular that more specific mention is made regarding provision for churches and other places of worship. An ever increasing number of people living and working in Worthing are becoming involved in the various churches within the town, and churches operate best when able to feel rooted in their community. A big part of this is having somewhere to operate from and this isn't met by the long term hire of premises that cannot be fully utilised for their needs and those of their community. A church with it's own building can serve it's community and greater Worthing so much more effectively than when it has to hire premises week by week.

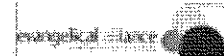
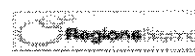
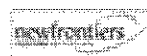
I hope that Worthing will take this opportunity to see the value in churches working within their community and adopt a more sympathetic view regarding Change of Use to release buildings for Community needs, as has been done very effectively in many other councils in West Sussex and beyond.

Yours faithfully

Rodney Haggart

Leader, Jubilee Church

Jubilee Community Church is an associate with Newfrontiers, part of
Regions Beyond and a member of the Evangelical Alliance



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Registered Office: Jubilee Community Church, Pilgrim House, 51-53 St Dunstan's Road, Worthing, West Sussex, BN13 1AA.



and is an initiative
of Jubilee Church

REFERENCE

Comment number: WIO-M-96

Date received: 22/06/2016



22 Jun (8 days ago)

to me

Please see attached.

Regards

Tony Barber

Your Town - Your Future

**A new Local Plan for Worthing
Consultation Document May 2016
Comments Form**

Worthing Borough Council has started work on preparing a new Local Plan which will have a big influence on the town in the period up to 2033. The publication of the 'Your Town - Your Future' consultation document provides the first opportunity to comment on relevant issues and options.

This consultation runs from **11th May to 22nd June 2016**

Website: www.adur-worthing.gov.uk/worthing-local-plan

Email: please email this completed form to worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council,
Portland House, 44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	Anthony
Last name	Barber
Organisation (where applicable)	
Address line 1	
Address line 2	
Address line 3	
Postcode	
Email address	

You can respond to this consultation online or by email. However, if your preference is to make comments manually this form can be photocopied as many times as necessary.

To keep you informed on progress all respondents will be added to the Worthing Planning Policy consultee database unless you request otherwise.

Use of information: Names and comments we receive will be available for public inspection and may be reported publicly as part of the Local Plan process. Contact details will not be published. Further information about how personal information is processed can be found on the Council's website. Unfortunately we cannot accept or report confidential or anonymous responses. All data will be stored securely in line with the Data Protection Act 1998.

Section B - Comments

The consultation document summarises issues and options within thematic sections. General comments can be inserted in the box below and comments about specific sections of the Plan can be made in response to some key questions that follow.

The Local Plan lacks specificity and a clear vision for a successful sustainable future for Worthing.

The restricted amount of new land for development within Worthing's boundaries should be recognised as an impetus for positive thinking. These restrictions will stop further wasteful and unsightly sub-urban sprawl, preserve agricultural land, woodland and natural amenity and should cause us to reflect on more effective ways of using land more sustainably. The preservation of agricultural and natural amenity are invaluable especially in relation to future population growth and environmental/ climate issues. And if global warming does cause significant sea level rise it will make effective land use a key sustainability factor.

Cries that 'the way to resolve the problem is to go up' are partially sensible. However 'intensification', which implies increased density and mix of uses, reduces unnecessary travel and creates a more sustainable town. If this strategy is adopted it is then a question of how dense and how high do we build. There are plenty of examples demonstrating that it is possible to achieve greater density in desirable, and viable, form within medium rise schemes (up to seven storeys) and even within low rise schemes – 3/4 storeys) without resorting to very tall buildings.

One of the present characteristics of Worthing is its relatively low rise quality with a large proportion of green landscape. If, for example, Worthing would like to quadruple its density, it is perfectly possible to achieve this within a 7 storey maximum limit. It depends on the clarity of the vision, its desirability, sustainable credentials and commitment. The Worthing plan needs to be a more far sighted vision to create a sustainable future.

A local policy is needed that discourages further dispersal of retail development, and low density residential development on the periphery of the town. All new development on the periphery needs to be denser and better connected by public transport.

A policy needs to encourage future development in the centre to rekindle its commercial heart and regenerate a thriving, lively, and culturally stimulating town centre that both residents and visitors want to be in. In conjunction with this there also needs to be a commitment to intensifying the town in terms of residential density and intensity of commercial, leisure and work activity. An increase in density will create more demand for retail, leisure and work opportunities. Residential density and mixed use will be mutually supportive and help stimulate a more vibrant town centre that will attract visitors. It will also enhance the attractiveness of the town to seaside visitors and help support seaside tourism.

A planning policy needs to be established that specifies residential density and mixed developments that reduce the necessity to travel by car to carry out basic activities. Greater intensity, accommodating most amenities within a ten minute walking distance, helps reduce pollution, traffic jams and encourages walking and cycling that in turn generate a healthier and more social lifestyle.

At present $\frac{3}{4}$ of the housing in Worthing is 1 and 2 storey detached and semi-detached.

This creates a density of up to 30 dwellings per hectare. It is dispersed and poorly supported by public transport. This automatically generates travel, often one car per person, and consequently particulate and carbon monoxide pollution, greater expenditure on more roads and longer service runs. Given there are now very limited opportunities for new development land, then using the opportunities Worthing has more effectively is important.

Even stipulating that new housing be 1 to 4 storey terraced would double the density and typically provide up to 60 dwellings per hectare. This is the typically density of the central terraced areas of Brighton and Hove which often have other amenities mixed in amongst them. There are good contemporary examples. These include Accordia in Cambridge, the RIBA 2008 Stirling prize winner, as an expensive private market example and William Street Quarter, Barking, London, as totally privately funded and affordable social housing.

When providing 4 storey flatted accommodation the density would increase to typically 120 dwellings per hectare. In London, Edinburgh, and Glasgow core parts of the city are good quality, thriving, examples of Victorian 4 storey, flatted accommodation with other activities mixed in, with residential densities typically 120 dwellings per hectare.

Worthing's projected need for housing is 40% for 1 bed, 30% for 2 bed, 25% for 3 bed and 5% for 4 bed. The major proportion of homes, (1 and 2 bedroom) could be provided in flatted form and ideally in the centre of town. This would increase the demand for other amenities, support existing and additional retail, make the centre a more active area, provide passive policing and reduce the need for travel. Commercial and retail uses could also be included at ground level that keep the streets active and policed by the public. This would increase the density and mix in the town centre and contribute to a more sustainable centre.

Much of the recent research and thinking about good sustainable urban development recommends higher densities with mixed uses. In urban areas mixed use developments typically of 120 dwellings per hectare are considered desirable. As previously outlined there is no necessity to resort to high rise or over dense developments. High rise is suitable in tropical locations where the sun is higher and shade and cooling is desirable. In places with temperate, more northern climates, such as Worthing, very tall buildings cause problems of overshadowing and wind turbulence. These are only really resolved by placing them in larger open sites and very careful detail design. By designing them sensibly with adequate landscaped surroundings to remove the problems the density rational is inevitably and dramatically reduced.

The London Plan Matrix provides guidance for suitable densities for sites with different qualities, locations and particular relationships to public transport. It would be much more strategic and sensible for Worthing Local Plan to take the long view and outline a medium rise vision with specified heights, as higher densities are achievable within medium rise schemes.

Most of central Paris rises up to 7 storeys and at times achieves 200 dwellings per hectare and most would consider it to be a desirable and attractive city. Even Worthing's Warnes scheme with 7 and 4 storey accommodation and car parking achieves a density of 142 dwellings per hectare.

These two examples alone demonstrate that it is possible to achieve a good density and create a reasonable townscape within a medium rise limit. Teville Gate is the only available site at present that could justifiably accommodate a much higher density similar

to that of a central Paris because of its rail station location and relative good bus links. St Johns Lane, London by Eric Van Egeraats Architects is just one contemporary example that shows that it is perfectly possible to reach a high density with supermarket, commercial, live/ work, accommodation and car parking all within a 7 storey medium rise development .There are numerous other Danish and Dutch examples that also demonstrate different approaches.

Recent protests over very tall buildings indicate that Worthing needs a clear policy supported by the town's residents and not one that developers can manipulate to their own advantage. The present Tall Buildings policy is too loose, especially when it facilitates very tall building speculation that is contested by the general public.

A townscape vision is needed. It would provide an aspirational outline for the physical quality of the town's built environment specifying height, massing and scale in relation to streetscape and public realm.

Given the scale and character of the townscape I would recommend the following additions to the Local Plan:

Limit the height of new buildings to 7 storeys or 23 metres.

Intensify the town centre with predominantly residential flats with ground level retail and commercial use.

Introduce this strategy on all the brown field sites identified in the local plan, and on all ground level car parks eg. Liverpool Road north of Liverpool gardens, Worthing General Hospital, and retail store carparks such as Morrisons and Waitrose.

Stipulate the policy of densification on all future redevelopment of sites.

Add housing to the top levels of multi storey car parks.

Increase the density of peripheral sites to a minimum of 60 dwellings per hectare

Revamp and upgrade the Guildbourne Centre to make it an attractive, viable, commercial asset.

Reconfigure the promenade to respond to growing flood issues, 21st century promenading and its role as Coastal Route One and significant recreational and sporting facility.

Revamp/reconfigure the existing pavilions and add new ones that combine public toilets and/or leisure/café /retail/recreational amenities, eg, Lancing beach café/gym. Or possibly Paris La Vilette style pavilions that offer facilities for pop up events , art displays, medical stops for fun runs, childrens events etc

Restore and revamp the Lido.

Require all beach front development to include beach amenities.

Reinvest in the public parks to enhance their neglected state and stimulate healthy recreational and sporting activity.

Improve public transport particularly to serve the more dense areas, the connections between town and rail and Chichester /Worthing /Brighton to reduce private car use.

The vision would be to build on Worthing's existing qualities, strengthen the advantages of being a town on the coast and enhance the leisure and recreational amenity to make a desirable, thriving and culturally rich sustainable medium rise town.

VISION

Q1a - Do you agree with the Vision we are aiming and aspiring to achieve?

Lots of good statistical information and analysis. But vision is not clear. Inadequate strategic planning and no strategic masterplanning or townscape strategies.

Q1b - Does it provide a clear direction for the Worthing Local Plan?

Q1c - Is there anything you think we have missed which you would like to see incorporated in the Vision?

A townscape ambition. An aspirational outline for the physical quality of the town's built environment specifying height, massing and scale in relation to streetscape and public realm.

STRATEGIC OBJECTIVES

Q2a - Do you agree with the proposed objectives set out above? If not, what changes would you like to see?

Q2b - Are the objectives sufficiently distinctive and locally specific?

ECONOMY

Q3a - Do you agree with the key challenges identified for the economy? Are any missing?

Q3b - Should the Local Plan continue to protect key employment areas or should it be more flexible in its approach?

Protect key employment areas and be flexible enough to accommodate new initiatives.

Q3c - In addition to the sites already identified as having the potential to deliver employment land are there any other sites that could accommodate employment growth?

RETAIL AND THE TOWN CENTRE

Q4a - Have all the key challenges for retail areas and the Worthing town centre been identified, if not what has been missed?

Large retail stores both in and out of the town centre should make better use of the land they occupy, be more environmentally sustainable and contribute qualitatively to the physical environment. They typically have large, hard landscaped car parks (one car high) which cause rapid surface water run off that contributes to flash flooding and are single storey volumes that contribute little to townscape. The car parks are a waste of space.

When development land is restricted more effective ways of using the land must be encouraged. There are precedents where ground level is retail store and perimeter activity and facades contribute to the streetscape and activity. Car parking is below ground and/or above the store and housing is provided at the upper levels. In Almere, Holland, for example the housing above a department store is 1 and 2 storey terraced wrapping round the perimeter creating a semi-public central green space.

Q4b - Are retail centres functioning well - how can they be improved?

No. See above.

Q4c - How could new development in the town centre enhance the town's identity and attract more visitors?

Investment in good public realm encourages greater use and business and pride. Buchanan Street, Glasgow and New Road/Jubilee Street, Brighton are just 2 examples. What is important is the quality. Worthing is committing money to improving Montague Street. It's spending good money on the labour (the workmanship is well crafted) but the materials are cheap and I'm not convinced about the design quality.

The multi storey carparks are well placed but their contribution to street activity and streetscape is limited. If the ground levels were remodelled and utilised for retail or commercial use it would enhance the streetscape and if flats were added to the top floor this would take of advantage of roof level assets and increase the density.

The sea front needs remodelling(retaining key historic qualities) to meet future sea level changes and provide a more attractive promenade asset.

TOURISM

Q5a - Have the key challenges for tourism been addressed?

Q5b - In what ways can the tourism offer be improved?

COMMUNITY AND LEISURE FACILITIES

Q6a - Do you agree with the main challenges identified in planning for the provision of different infrastructure needs? Are any missing?

Q6b - Do you have suggestions for how the Local Plan could resolve these?

Q6c - Are you aware of any particular community and leisure needs?

TRANSPORT

Q7a - Do you agree with the main challenges identified? Are any missing?

Q7b - Do you have any suggestions for how the Local Plan could better promote sustainable transport?

ENVIRONMENT
Q8a - Do you agree with the main environmental challenges identified? Are any missing?
Q8b - Do you have any suggestions for how the Local Plan could reach a balance between competing needs?
Q8c - Are there any circumstances you consider where regardless of mitigation, development would be inappropriate?
Q8d - What value do you place on the borough's green spaces, particularly those around the town?

HOUSING
Q9a - Should housing delivery be given higher priority than other development needs (e.g. employment land, community facilities)?
Q9b - How should we best address specialist housing needs (e.g. affordable housing; family housing; self-build housing; sheltered & extra care; houses in multiple occupation)?
Q9c - Efficient use of land will help to raise densities and will contribute towards meeting development needs. What potential impacts of this should the Council try to mitigate?
Q9d - Should the Council include a policy that would resist the inappropriate development of residential gardens?

DEVELOPMENT OPTIONS WITHIN THE TOWN
Q10a - Do you agree that the sites listed above provide the most significant redevelopment and regeneration opportunities to deliver housing, employment and leisure uses within the town?
Yes
Q10b - Do you have any particular comments on how any of the identified sites should be developed and for what mix of uses?
Predominantly residential with a density of around 120 dph and ground level commercial/retail/leisure uses.
Q10c - Are there any other potential development sites within the current built up area that should be assessed?
The numerous car park areas that are an inefficient use of land. See introductory statements

EDGE OF TOWN DEVELOPMENT OPPORTUNITIES
Q11a - Given the housing needs in the Borough do you have any views as to which of these sites should be developed or protected?
Do not develop Goring/ Ferring Gap, Chatsmore Farm, nor the northern part of West Durrington If other sites are developed the must be at least 60 dwellings per hectare.
Q11b - If any of these sites (in full or in part) are to be allocated for development do you have any views on how they should be developed?

Q11c - If any of these sites are not allocated for development do you have any views on how they should be protected, enhanced or used?

Q11d - Land West of Fulbeck Avenue (site 7) and Land north of West Durrington (site 8) are already within the Built Up Area boundary. In light of significant housing needs should the Council take a positive approach and look to bring forward these sites in advance of the adoption of the new Local Plan?

PLANNING POLICIES

Q12a - Do you have any views on how any of the listed policies should be worded?

Q12b - Are there any policies missing from the list?

See above

Q12c - Are all of the listed policies required?

Please continue on separate sheets as necessary

Name:		Signature	
Date:			

REFERENCE

Comment number: WIO-M-97

Date received: 23/06/2016

Byrne, Alan <Alan.Byrne@historicengland.org.uk>

23 Jun (7 days ago)

to me

Dear Sir

With apologies for the slight delay in getting a response to you, I attach Historic England's comments on the above consultation document.

Alan Byrne
Historic Environment Planning Adviser
National Planning and Conservation Department
Direct Line: 01483 252020
Historic England | South East | Eastgate Court
195-205 High Street | Guildford | GU1 3EH



Historic England

worthinglocalplan@adur-worthing.gov.uk

Our ref: Seast/Worthing/LP
Your ref:

By email only

Telephone 01483 252020
Fax 01483 252001
Email e-seast@historicengland.org.uk
Date 22 June 2016

Dear Sir / Madam

Worthing Local Plan *Your Town, Your Future* Consultation

Thank you for your email of 11 May 2016 inviting comments on the above consultation document. Please note that since 1 April 2015 English Heritage has become Historic England for the purposes of statutory consultations on planning and related matters.

As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages of the planning process. This includes formulation of local development policy and plans, supplementary planning documents, area and site proposals, and the on-going review of policies and plans.

There are many issues and matters in the consultation document that are beyond the remit and concern of Historic England and our comments are, as required, limited to matters relating to the historic environment and heritage assets. We note that as an early stage in the formulation of a local plan the current document may be subject to significant change and consequently we consider it appropriate to limit our comments to more general matters; we will comment more specifically and in detail at later stages in the plan making process as appropriate. In this respect, you should not take the comments below as the definitive view of Historic England on the matters contained in the plan; they are provided for general guidance in the iterative process of preparing appropriate policies for the historic environment. In particular, it focusses on the objective of the National Planning Policy Framework, inter alia, to set out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment (NPPF, Paragraphs 126 and 157); and contain strategic policies to deliver the conservation and enhancement of the historic environment (NPPF, Paragraph 156).



Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone 01483 25 2020 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.





Historic England

A positive strategy in the terms of NPPF paragraphs 9 and 126 is not a passive exercise but requires a plan for the maintenance and use of heritage assets and for the delivery of development including within their setting that will afford appropriate protection for the asset(s) and make a positive contribution to local character and distinctiveness.

This strategic approach can inform all aspects of the planning system by recognising and reinforcing the historic significance of places. As part of a sound conservation strategy, policies for local housing, retail and transport, for example, may need to be tailored to achieve the positive improvements in the historic environment that the NPPF expects (NPPF, Paragraph 8). Conservation is certainly not a stand-alone exercise satisfied by stand-alone policies that repeat the NPPF objectives.

Consequently, the Worthing Local Plan might need to consider the inter-relationship of the objectives for the historic environment with the following issues of local importance:

- Building a strong, competitive economy – How might the plan conserve and enhance the quality of the historic environment in order to encourage tourism, help create successful places for businesses to locate and attract inward investment? What opportunities are there for heritage-led regeneration?
- Ensuring the vitality of town centres and villages – What role can the historic environment play in increasing the vitality and attractiveness of town and village centres?
- Supporting a prosperous rural economy – What opportunities does the reuse or adaptation of traditional buildings provide for supporting the rural economy or providing homes for local people? What potential is there for new heritage-led tourism initiatives?
- Promoting sustainable transport – How might new or improved roads and other transport infrastructure be delivered in a manner which also conserves the historic environment of the area? Could the introduction of sustainable transport initiatives offer related opportunities for heritage through improving street/ traffic management or public realm enhancement at the same time?
- Delivering a wide choice of high quality homes – How might the plan encourage adaptive reuse of historic buildings? How might new residential developments best be integrated into historic areas?
- Requiring good design – How might the defining characteristics of each part of the Wealden plan area be reinforced in the approach to design?



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Historic England

In formulating the strategy it is advisable and often necessary to consider the following factors:

- How the historic environment can assist the delivery of the positive strategy and the economic, social and environmental objectives for the plan area (NPPF, Paragraphs 126 and 132 and Sections 66 and 72 of the Planning (Listed Buildings & Conservation Areas) Act 1990);
- How the plan will address particular issues identified during the development of the evidence base, including heritage at risk and the reuse of buildings;
- The location, design and use of future development and how it can contribute to local identity and distinctiveness;
- The interrelationship between conservation of heritage assets and green infrastructure, landscape, regeneration, economic development, transport works, infrastructure planning, tourism, social and cultural assets, town centres and climate change mitigation/adaptation (NPPF, Paragraph 126);
- The means by which new development in and around designated heritage assets might enhance or better reveal their character and significance (NPPF, Paragraph 137);
- The means by which new development in Conservation Areas and within the setting of heritage assets might enhance or better reveal their significance (NPPF, Paragraph 137);
- How Article 4 Directions may be employed to provide an additional conservation mechanism;
- How Historic Environment Records and local lists might assist in identifying and managing the conservation of non-designated heritage assets;
- How the archaeology of the plan area might be managed;
- The possible role for CIL and/or s106 in delivery of required infrastructure;
- Whether master plans or design briefs need to be prepared for significant sites where major change is proposed;
- What implementation partners need to be identified in order to deliver the positive strategy;
- What indicators should be used to monitor the heritage strategy's effectiveness; and,
- In order to deliver an effective strategy for the conservation of the historic environment, is there a need for the plan to include Development Management Policies and where appropriate specific policies for specific assets or specific areas within the plan area?

The plan will be the starting point for decisions on planning applications, and neighbourhood plans are only required to be in general conformity with the strategic policies of the Local Plan (NPPF, Paragraph 184). Consequently, sustainably managing the historic environment is best achieved by identifying clear strategic policies for heritage, in order to assist those preparing neighbourhood plans.

The local plan needs to assess whether or not it should identify any areas where certain types of development might need to be limited or would be inappropriate due to the impact that they might have upon the historic environment (NPPF, Paragraph 157). This might include, for example, tall buildings within identified view corridors.



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Historic England

Specific Development Management Policies may be needed in order for decision-takers to determine how they should react to an application affecting a heritage asset. Such circumstances could include the following:

- Those areas where Development Management Policies are necessary to amplify a general, overarching, Strategic Policy for the historic environment – for instance, to deal with particularly distinctive or important historic environment features or significance;
- Those areas where further clarity would be useful – for instance, how Worthing Borough Council will determine applications affecting archaeological remains of less than national importance;
- Those areas where Development Management Policies may be necessary to address the local circumstances of the Plan area - for example, to clarify the approach to development within an Archaeological Notification Area, or to protect or enhance important views and vistas;
- Those circumstances where Development Management Policies are needed to address particular cross-boundary issues – such as the South Downs National Park whose management is carried out by joint working between several local planning authorities, or the management of e.g. those extensive historic landscapes which run across a number of authority areas.

A conservation strategy can help with site allocations in terms of considering environmental and policy constraints against the evidence in the relevant Strategic Housing Market Assessment (ref. Planning Minister's letter to Chief Planners 19 December 2014 www.gov.uk/government/publications/strategic-housing-marketassessments).

It can identify opportunities to conserve the historic environment, such as site allocations positively addressing heritage assets at risk, and can help to ensure that site allocations avoid harming the significance of heritage assets (including effects on their setting). The strategy can also be used to inform the nature of allocations so development responds to and reflects local character. Site allocations should be informed by an evidence base and an analysis of potential effects on heritage assets.

A heritage SPD (or heritage strategy) brought forward in line with paragraph 153 of the NPPF can be a useful tool to amplify and elaborate on the delivery of the positive heritage strategy in the Local Plan and some local planning authorities have chosen to support their conservation strategy within the Local Plan using a topic-specific SPD.



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Historic England

We would welcome the inclusion of policies for the historic environment in the local plan that meet the obligation for preparing the positive strategy required by the NPPF. However, you will note from the above comments that we do not consider stand-alone policies in themselves to be sufficient. The policies and proposals throughout all sections of the plan should be tested against the potential effects they will have on the historic environment and the significance of heritage assets. This, also, will be a key test of the soundness of the plan and the achievement of sustainable development as defined in the NPPF when it is subject to examination.

If you would like further advice on the content of this letter or to discuss how the draft Worthing Local Plan could be revised to better reflect the intention of the NPPF, please contact me.

Yours sincerely



Alan Byrne
Historic Environment Planning Adviser



REFERENCE

Comment number: WIO-M-98

Date received: 21/06/2016

Comment number:

Date received: 7 JUN 2016

Your Town –Your Future

**A new Local Plan for Worthing
Consultation Document May 2016
Comments Form**

Worthing Borough Council has started work on preparing a new Local Plan which will have a big influence on the town in the period up to 2033. The publication of the 'Your Town- Your Future' consultation document provides the first opportunity to comment on relevant issues and options.

This consultation runs from 11th May to 22nd June 2016.

Website: www.adur-worthing.gov.uk/worthing-local-plan

Email: worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

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You can respond to this consultation online or by email. However, if your preference is to make comments manually this form can be photocopied as many times as necessary.

To keep you informed on progress all respondents will be added to the Worthing Planning Policy consultee database unless you request otherwise.

Use of Information: Names and comments we receive will be available for public inspection and may be reported publicly as part of the Local Plan process. Contact details will not be published. Further information about how personal information is processed can be found on the Council's website. Unfortunately we cannot accept or report confidential or anonymous responses. All data will be stored securely in line with the Data Protection Act 1998.

Section B - Comments

The consultation document summarises issues and options within thematic sections and goes on to set out some key questions. Whilst comments are invited on all aspects of the emerging Local Plan it would help us if you could clarify which section of the document or which question you are responding to.

- A27 ALREADY HAS HIGH VOLUME OF TRAFFIC THROUGH TO EARLY EVENING (90 HOUSES POTENTIAL OF 180⁺ EXTRA CARS COMING DOWN BECHES AVE TO JOIN A27)
- DRAINAGE SYSTEM FLOODS NOW AND CANNOT COPE
- INCREASE IN CARBON FOOTPRINT - POLLUTION
- IMPACT ON DOWNS NATIONAL PARK & WILDLIFE
- CAN LOCAL EDUCATION SYSTEM COPE - MORE CHILDREN IN AID SPACES - ALREADY STRUGGLING

Please continue on separate sheets as necessary

Name:	CHRIS CAUSDALE SUE CAUSDALE	Signature	
Date:	20/6/16		



REFERENCE

Comment number: WIO-M-99

Date received: 21/06/2016

Comment number:

Date received: 1 JUN 2016

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Section A - Contact Details

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Last name	Evans
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Email address	

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There are several reasons why I think it should be refused.

1. This is Grade 1 listed farming land. We should grow as much as we can to feed the UK and to limit imports. Brown field site building should be used first.
2. As the local flood report acknowledges a flood plain + high water table with respect to the area means in winter flooding and standing water happens most winters. For this reason building on this area is not sensible.
3. The local area has + will continue to see, because of existing developments a massive increase in the population. The infrastructure schools particularly primary and doctor's surgeries are already overstretched and GP's giving up practices because of the excess pressure.
4. For me + many locally who don't find it offends an open space of countryside which encourages a range of outdoor activities. To lose it will not aid the drive to discourage and limit the obesity crisis in the population.

Please do not allow planning permission

Please continue on separate sheets as necessary

Name:	Alison Evans	Signature	
Date:	21st Jun 2016		

REFERENCE

Comment number: WIO-M-100

Date received: 21/06/2016

Mr M A Clement

21 JUN 2016

16th June 2016.

Dear Sir/Madam,

I am writing to show my support for the plan the Worthing Borough Council have for the Goring Gap South side and Chatsmore Farm, ref. Question 11 "Edge of town development opportunities.

I ask the Independent Government Planning team to consider the feelings of the local people who have strong views on the subject of keeping, what is known as "The Goring Gap" free of any development.

It may look "on paper" a suitable site, but oh, what a loss it would be if local people views were ignored.

Yours faithfully,

To Worthing Borough Council,
Worthing,
West Sussex.

REFERENCE

Comment number: WIO-M-101

Date received: 21/06/2016

18-06-2016

ref: pages 28-32. Q11

Worthing local plan.



21 JUN 2016

Dear Sir/Madam,

We would like to express our support for the Greenfield sites in the Goring gap to remain protected and unspoilt. As residents of many years it has always been an asset for children young & old and a great tourist attraction as there are few unspoilt green spaces in such a heavily populated area.

Yours sincerely,



REFERENCE

Comment number: WIO-M-102

Date received: 21/06/2016



Office Use only

Comment number:

Date received: **21 JUN 2016**

Your Town –Your Future

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Consultation Document May 2016
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Website: www.adur-worthing.gov.uk/worthing-local-plan

Email: worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	DOREEN
Last name	HONEYBALL MRS
Organisation (where applicable)	
Address line 1	
Address line 2	
Address line 3	
Post Code	
Email address	

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Section B - Comments

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My view for the protection of Goring/Ferring Gap + Chatsmore Farm Q11

- 1, This is an area of outstanding natural landscape from Highdown Hill, an ancient Anglo-Saxon settlement, with uninterrupted access to the coast & should not be considered for building development.
- 2, a change of agriculture land such as this site would mean a loss of a natural gap along the coast.
- 3, In the past, this land has been flooded, so is unsuitable for house development.
- 4, Planners must protect this landscape, agriculture land, open land & keep access to all, as it is part of the South Downs National Park heritage & as such should remain undeveloped.

Please continue on separate sheets as necessary

Name:	D.S. HONEYBANK	Signature	
Date:	20 June 2016		



REFERENCE

Comment number: WIO-M-103

Date received: 21/06/2016

Once Use Only

Comment number:

Date received: **21 JUN 2016**

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Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	MARY PAULINE
Last name	GORHAM
Organisation (where applicable)	—
Address line 1	[REDACTED]
Address line 2	
Address line 3	
Post Code	
Email address	

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The Goring Gap South & Chatsmore
Fare

We should protect the gap.
1) People Need to have open
walking spaces, for leisure
near houses in spaces which
give lovely views, we are
meant to be more mobile, by
the government!!

Who is going to live here?
NOT people from other areas
London! why?

Please continue on separate sheets as necessary

Name:	MARY GORHAM	Signature	
Date:			



REFERENCE

Comment number: WIO-M-104

Date received: 21/06/2016

Office Use only

Comment number:

Date received:

1 JUN 2016

Your Town –Your Future

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Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	WENDY
Last name	NORTON
Organisation (where applicable)	
Address line 1	
Address line 2	
Address line 3	
Post Code	
Email address	

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The Goring Gap South side of Chatsmore Farm


Pp 28-32

P.32 Q11

As the Landscape Study has found, development would have a detrimental effect on the landscape & separation between Ferring & Goring. It is the only gap along the coast between Brighton & west of Littlehampton where fields run down to the sea, and is very precious.

The Goring Gap fields are a haven for seabirds and other wildlife. wildflowers, butterflies, birds and mammals such as foxes and squirrels abound. The fields & footpaths are a wonderful amenity for local walkers, and are well used by them.

Please continue on separate sheets as necessary

Name:	MRS. WENDY NORTON	Signature	
Date:	17/6/16		

REFERENCE

Comment number: WIO-M-105

Date received: 21/06/2016



Office Use only

Comment number:

Date received: 21 JUN 2016

Your Town –Your Future

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Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	Pamela
Last name	Baker
Organisation (where applicable)	
Address line 1	
Address line 2	
Address line 3	
Post Code	
Email address	

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FUTURE OF GORING GAP

I wish to submit the following representation regarding any future development of Goring Gap North and South of the Railway Line.

From the South, as part of the strategic gap, the area represents one of the few remaining Sites along the Sussex coast from the Seven Sisters, where a clear view of the South Downs from the beach can be enjoyed. This is particularly important when the view is of Highdown, which has such strong historical and emotional links with the local people.

The area should be an amenity for the enjoyment and recreation of the local people, and its value in being one of the few flat locations that facilitates access for the disabled and also for the very young and elderly alike, cannot be overstated.


It is also recorded as an important stopover for migrating birds and a habitat for wildlife.

The erection of any buildings on this site would, without doubt, create a precedent for all further proposed developments and will destroy one of the last areas we have for informal recreation.

This is also true of the site to the North of the railway line, it is absolutely essential that we preserve at least a little of the green lung for the town, so many of our open spaces have now been built upon, or are fenced and caged off for the exclusive use of a minority. The obvious benefits from a health point of view of these two areas are immeasurable.

I would like to feel that the Planning Team and Local Council will have the courage and foresight to secure the future of this area for the benefit of all local people in perpetuity; there are already far too many fences and cages around.

Please continue on separate sheets as necessary

Name:	PAMELA BAKER	Signature	
Date:	20-06-16		



REFERENCE

Comment number: WIO-M-106

Date received: 21/06/2016

Office Use only

Comment number:

Date received: 1 JUN 2016

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Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
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Section A - Contact Details

First name	Michael
Last name	Baker
Organisation (where applicable)	
Address line 1	
Address line 2	
Address line 3	
Post Code	
Email address	

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I would like to feel that the Planning Team and Local Council will have the courage and foresight to secure the future of this area for the benefit of all local people in perpetuity; there are already far too many fences and cages around.

Please continue on separate sheets as necessary

Name:	MICHAEL BAKER	Signature	
Date:	20-06-16		

REFERENCE

Comment number: WIO-M-107

Date received: 21/06/2016



Office Use only

Comment number:

Date received: **21 JUN 2016**

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Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	GLADYS
Last name	DEWEY
Organisation (where applicable)	
Address line 1	[REDACTED]
Address line 2	
Address line 3	
Post Code	
Email address	

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I AM WRITING TO VOICE MY CONCERNS REGARDING THE WORTHING LOCAL PLAN AND IN PARTICULAR THE AREAS COVERED BY QUESTION 11 PAGES 28-32 EDGE OF TOWN DEVELOPMENT OPPORTUNITIES. I MOVED TO WORTHING FROM LONDON 10 YEARS AGO BECAUSE OF THE BEAUTY OF THE AREA. THE GORING GAP IN PARTICULAR HAS ALLOWED ME TO WALK IN THE COUNTRY AND EXPERIENCE THE TRANQUILITY OF THE UNIQUE COMBINATION OF GREENSWARD, FARMERS FIELD, WOODS AND OF COURSE ILEX WAY WITH ITS WONDERFUL LINE OF HOLMOAK TREES. THIS UNSPOILT AREA ALLOWS ME TO SEE NUMEROUS FLORA AND FAUNA WHICH RELY ON THIS AREA BEING LEFT EXACTLY AS IT IS. EVEN THE SMALLEST AMOUNT OF DEVELOPMENT WOULD RUIN THIS STRATEGIC GAP. THE LOCAL AREA IS ALREADY OVERPOPULATED WITH HOSPITALS, SCHOOLS, DOCTORS SURGERIES AND ROADS AT BREAKING POINT. THE AREA IS PRONE TO FLOODING AND THE EXISTING SEWERAGE SYSTEM PRONE TO OVERLOAD OFTEN CAUSING POLLUTION IN THE SEA. THERE ARE MANY OTHER SITES IN WEST SUSSEX THAT COULD BE DEVELOPED BEFORE ANY SACRIFICES ARE MADE AT GORING GAP OR CHATSMORE FARM.

Please continue on separate sheets as necessary

Name:	GLADYS PEWLEY	Signature	
Date:	19. 6. 2016.		



REFERENCE

Comment number: WIO-M-108

Date received: 21/06/2016



Office Use only

Comment number:

Date received: **21 JUN 2016**

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Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name

Gwendolyn

Last name

DAVIES

Organisation
(where applicable)

Address line 1

Address line 2

Address line 3

Post Code

Email address

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Please continue on separate sheets as necessary

Name:	Gwendolyn Davies	Signature	
Date:	19th June 2016		

REFERENCE

Comment number: WIO-M-109

Date received: 21/06/2016



Office Use only

Comment number:

Date received: 21 JUN 2016

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Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	MAATYN
Last name	DAVIES
Organisation (where applicable)	
Address line 1	
Address line 2	
Address line 3	
Post Code	
Email address	

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Please continue on separate sheets as necessary

Name:	MARTYN DAVIES	Signature	
Date:	19 TH /JUNE/2016		

REFERENCE

Comment number: WIO-M-110

Date received: 21/06/2016



Office Use only
Comment number:
Date received: 21 JUN 2016



20 JUN 2016

Customer Services

Your Town - Your Future A new Local Plan for Worthing Consultation Document May 2016 Comments Form

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Email: please email this completed form to worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council,
Portland House, 44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	Philip
Last name	Barber
Organisation (where applicable)	
Address line 1	
Address line 2	
Address line 3	
Postcode	
Email address	

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Section B - Comments

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--

VISION
Q1a - Do you agree with the Vision we are aiming and aspiring to achieve?
Q1b - Does it provide a clear direction for the Worthing Local Plan?
Q1c - Is there anything you think we have missed which you would like to see incorporated in the Vision?

STRATEGIC OBJECTIVES
Q2a - Do you agree with the proposed objectives set out above? If not, what changes would you like to see?
Q2b - Are the objectives sufficiently distinctive and locally specific?

ECONOMY
Q3a - Do you agree with the key challenges identified for the economy? Are any missing?
Q3b - Should the Local Plan continue to protect key employment areas or should it be more flexible in its approach?
Q3c - In addition to the sites already identified as having the potential to deliver employment land are there any other sites that could accommodate employment growth?

RETAIL AND THE TOWN CENTRE
Q4a - Have all the key challenges for retail areas and the Worthing town centre been identified, if not what has been missed?
Q4b - Are retail centres functioning well - how can they be improved?
Q4c - How could new development in the town centre enhance the town's identity and attract more visitors?

TOURISM
Q5a - Have the key challenges for tourism been addressed?
Q5b - In what ways can the tourism offer be improved?

COMMUNITY AND LEISURE FACILITIES
Q6a - Do you agree with the main challenges identified in planning for the provision of different infrastructure needs? Are any missing?
Q6b - Do you have suggestions for how the Local Plan could resolve these?
Q6c - Are you aware of any particular community and leisure needs?

TRANSPORT
Q7a - Do you agree with the main challenges identified? Are any missing?
Q7b - Do you have any suggestions for how the Local Plan could better promote sustainable transport?

ENVIRONMENT
Q8a - Do you agree with the main environmental challenges identified? Are any missing?
Q8b - Do you have any suggestions for how the Local Plan could reach a balance between competing needs?
Q8c - Are there any circumstances you consider where regardless of mitigation, development would be inappropriate?

Q8d - What value do you place on the borough's green spaces, particularly those around the town?

Q9a - Should housing delivery be given higher priority than other development needs (e.g. employment land, community facilities)?

Q9b - How should we best address specialist housing needs (e.g. affordable housing; family housing; self-build housing; sheltered & extra care; houses in multiple occupation)?

Q9c - Efficient use of land will help to raise densities and will contribute towards meeting development needs. What potential impacts of this should the Council try to mitigate?

Q9d - Should the Council include a policy that would resist the inappropriate development of residential gardens?

Q10a - Do you agree that the sites listed above provide the most significant redevelopment and regeneration opportunities to deliver housing, employment and leisure uses within the town?

Q10b - Do you have any particular comments on how any of the identified sites should be developed and for what mix of uses?

Q10c - Are there any other potential development sites within the current built up area that should be assessed?

Q11a - Given the housing needs in the Borough do you have any views as to which of these sites should be developed or protected?

George Orwell in 1940 wrote that "the gentleness of English civilisation is its most marked characteristic", this applies equally to the land as well.
The Goring Gap both North & Southside should be protected from development at any time. They separate the two communities of Goring & Ferring, each a separate and important identity. The gap offers an uninterrupted and unique view from the sea to the South Downs. Building would have a significant and detrimental effect on the character of the landscape. This land is grade 1 agricultural land and will be destroyed if developed.
What a lot of people do not see is that once land is developed on it will never be able to return to its original form.
Once its gone its gone.
What with the rise in sea levels and unpredictable weather patterns and living adjacent to this land I am very concerned that it will no longer act as a sponge and a barrier for excess water. Not only will the developed properties be prone to possible flooding but my own property will suffer.
We need this land untouched under any circumstances.
The gap is also a habitat for sea and wading birds who are roosting or resting during migration and inclement weather.
It is rural environment with easy urban access.
Decisions on this land should be made by local people for local people as in the cause of true

democracy, not by some government official who has never visited the Gap, knows its geography or the feeling of local people.
 In 1962 patriotic Labour leader Hugh Gaitskell warned that European rule would mean "the end of a thousand years of history" for Britain, this also applies to decisions made to the land.
 If the gaps are built upon the prediction will swiftly become a reality
 Please keep the gaps free.

Q11b - If any of these sites (in full or in part) are to be allocated for development do you have any views on how they should be developed?

Q11c - If any of these sites are not allocated for development do you have any views on how they should be protected, enhanced or used?

Q11d - Land West of Fulbeck Avenue (site 7) and Land north of West Durrington (site 8) are already within the Built Up Area boundary. In light of significant housing needs should the Council take a positive approach and look to bring forward these sites in advance of the adoption of the new Local Plan?

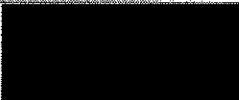
PLANNING POLICIES

Q12a - Do you have any views on how any of the listed policies should be worded?

Q12b - Are there any policies missing from the list?

Q12c - Are all of the listed policies required?

Please continue on separate sheets as necessary

Name:	Philip Barber	Signature	
Date:	20/06/2016		



REFERENCE

Comment number: WIO-M-111

Date received: 21/06/2016

Date received: **21 JUN 2016**



20 JUN 2016

Customer Services

Your Town - Your Future

A new Local Plan for Worthing
Consultation Document May 2016
Comments Form

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This consultation runs from **11th May to 22nd June 2016**

- Website:** www.adur-worthing.gov.uk/worthing-local-plan
- Email:** please email this completed form to worthinglocalplan@adur-worthing.gov.uk
- Phone:** 01903 239999
- Address:** Planning Policy Team, Worthing Borough Council,
 Portland House, 44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	Angela
Last name	Barber
Organisation (where applicable)	
Address line 1	
Address line 2	
Address line 3	
Postcode	
Email address	

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Q8d - What value do you place on the borough's green spaces, particularly those around the town?

HOUSING

Q9a - Should housing delivery be given higher priority than other development needs (e.g. employment land, community facilities)?

Q9b - How should we best address specialist housing needs (e.g. affordable housing; family housing; self-build housing; sheltered & extra care; houses in multiple occupation)?

Q9c - Efficient use of land will help to raise densities and will contribute towards meeting development needs. What potential impacts of this should the Council try to mitigate?

Q9d - Should the Council include a policy that would resist the inappropriate development of residential gardens?

REDEVELOPMENT OPPORTUNITIES WITHIN THE TOWN

Q10a - Do you agree that the sites listed above provide the most significant redevelopment and regeneration opportunities to deliver housing, employment and leisure uses within the town?

Q10b - Do you have any particular comments on how any of the identified sites should be developed and for what mix of uses?

Q10c - Are there any other potential development sites within the current built up area that should be assessed?

RANGE OF TOWN CENTRE DEVELOPMENT OPPORTUNITIES

Q11a - Given the housing needs in the Borough do you have any views as to which of these sites should be developed or protected?

The Goring Gap, both North and Southside should be protected from development at any time. They separate the two communities of Goring and Ferring, each a separate and important identity. If the gaps are developed they would then turn the villages into an urban sprawl of "Greater Worthing", which is totally unacceptable. The gap offers an uninterrupted and unique view from the sea to the South Downs and any building would have a significant and detrimental effect on the character of the landscape. This land is grade 1 agricultural land and will be destroyed if developed. Once built on it can never be returned to its original form, its gone forever!

The gaps are also a vital protection against flooding from heavy rain. Not only would developments on the gaps be at risk from flooding, but also existing properties adjacent to the gaps would be at an increased risk.

And most importantly, decisions regarding this land should be made by local people for local people and not by some government official, who has never visited the gaps and knows nothing of its geography or the feeling of local people.

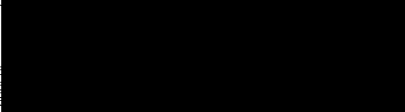
In any case, there would be room for some 1100 dwellings on this land. Developers seem to promise all manner of infrastructure to get planning permission. Do they keep these promises? Very unlikely!!

I live on the Goring/Ferring border. Can I easily get a doctors appointment? No. I have been waiting for a hospital appointment for months. More people in the area would make waiting lists even longer.

PLEASE KEEP THE GAPS FREE!!!!!!
Q11b - If any of these sites (in full or in part) are to be allocated for development do you have any views on how they should be developed?
If anything, put some wind turbines on the gaps. Then the land can remain as agricultural land.
Q11c - If any of these sites are not allocated for development do you have any views on how they should be protected, enhanced or used?
Q11d - Land West of Fulbeck Avenue (site 7) and Land north of West Durrington (site 8) are already within the Built Up Area boundary. In light of significant housing needs should the Council take a positive approach and look to bring forward these sites in advance of the adoption of the new Local Plan?

PLANNING POLICIES
Q12a - Do you have any views on how any of the listed policies should be worded?
Q12b - Are there any policies missing from the list?
Q12c - Are all of the listed policies required?

Please continue on separate sheets as necessary

Name:	Angela Barber	Signature	
Date:	20/06/2016		

REFERENCE

Comment number: WIO-M-112

Date received: 22/06/2016



Office Use only

Comment number:

Date received:

Your Town –Your Future
A new Local Plan for Worthing
Consultation Document May 2016
Comments Form

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Email: worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

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Post Code	
Email address	

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Section B: Comments

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South Side GORING GAP + CHATSMORE FARM

- 1 - This Greensward is a beautiful, open, green space & what sets Goring-by-Sea apart from so many other seaside areas. People come from everywhere to enjoy the area - walk, Picnic, Fly kites, Play etc. Any ^{new} development would spoil this and have a totally detrimental effect on the area which would never recover
- 2 - Parking would become a major as would the extra traffic
- 3 - This area is a habitat for many birds who are resting or roosting during migration time

Please continue on separate sheets as necessary

Name:		Signature	
Date:	19/06/16		

REFERENCE

Comment number: WIO-M-113

Date received: 22/06/2016



Office Use only

Comment number:

Date received:

Your Town –Your Future

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Phone: 01903 239999

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44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

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Last name	WELCH
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- Q 11. 4. Goring Gap South Side
5. Goring Gap North side / Chatsmore farm.

- A. These sites should be protected at all costs for many reasons:-
1. Building here would have a significant & detrimental effect on the character of the landscape.
 2. Risk of flooding due to over building
 3. Grade 1 farmland would be destroyed, if developed
 4. This area is a wildlife habitat to include Sea birds, wading birds also our native birds.
 5. This area offers an uninterrupted unique views from the sea to the south downs
 6. Natural countryside for the residents of Goring & Ferning
- B. These sites should not be developed for the above reasons, there is no need for housing here - let's keep it as rural as it already is. Once countryside has gone it will never be replaced, only with concrete. The environment would alter considerably & there would be loss of wildlife.
- C. Keep these sites just as they are - agricultural land is important.

Please continue on separate sheets as necessary

Name:		Signature	
Date:	13. 6. 16		



REFERENCE

Comment number: WIO-M-114

Date received: 22/06/2016

Office Use only

Comment number:

Date received:

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Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	MARGARET
Last name	WELCH
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Address line 2	
Address line 3	
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Email address	

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Q11 4 Goring Gap South Side
5 Goring Gap North side / Chatsmore farm

(A) These sites should be protected for reasons given below

Building would have a significant & detrimental effect on the character of the landscape.

If developed it will destroy agricultural land which is an important commodity.

Flood risk

Natural habitat for sea birds & wading birds & native species would disappear for good, if developed

The gap offers an uninterrupted & unique views from the sea to the south downs

(B) These 2 sites should not be allocated for development leave the countryside natural, it is fast disappearing

(C) These sites should be left as natural surroundings due to its proximity to the sea & downs, which most people enjoy.


Please continue on separate sheets as necessary

Name:		Signature	
Date:	15.6.16		

REFERENCE

Comment number: WIO-M-115

Date received: 22/06/2016


Development Management
Adur-Worthing Council
Portland House
44 Richmond Road
Worthing
West Sussex
BN11 1HS

20 June 2016

Dear Sirs

Worthing Local Plan

I am writing to raise objections to any proposed regeneration and growth throughout the borough and in particular those areas in and around Goring including The Goring Gap and Chatsmore Farm. I am not so concerned about the HMRC offices and Martletts Way as there are already buildings on these sites and one building is merely being replaced by another and that might not be a bad thing for the HMRC offices in particular.

My wife and I lived in Weybridge, Surrey for the last 36 years and during that time we have watched a small town reposition itself into a bustling commuter community with good travel connections both road, rail and airports. What were small houses with gardens have been bought up, demolished and replaced by state of the art town houses fetching mega bucks.

Both my wife and I are retired and we spent much time and effort looking for somewhere to live out our lives. We settled on Worthing and in particular Goring where we found a small new build development which seemed to tick most of the boxes. It should be said that life at a completely different speed with clean air to breathe has greatly reduced my blood pressure problems.

We liked the proximity of the South Downs National Park which we can see every day from our house as we look northwards over the fields of Chatsmore Farm. The open spaces of the Farm provide a welcome break from the built up areas along the coast from east of Brighton to Littlehampton and Bognor Regis. The thought of a housing estate being built on this agricultural land providing an almost uninterrupted wall of a dense complex beggars belief. To have the openness of Chatsmore and Roundstone farms provide welcome relief from creeping and relentless urbanisation.

There is much to be said for standing on the top of Highdown Hill and looking out to the English Channel with hardly a dwelling in sight. Who would want to stand on this hill and look onto rows and rows of brick and into people's back gardens. Its bad enough looking onto Asda and the small industrial/commercial activities on the north side of the A259.

If planning applications are passed for development of the Goring Gap and Chatsmore Farm my wife and I might as well sell up and move back to the commuter land of SW Surrey where the air we breathe leaves much to be desired and the roads are full of Chelsea Tractors and the pavements full of double income no kids or young upwoody mobile 30 year olds

Yours Faithfully



REFERENCE

Comment number: WIO-M-116

Date received: 22/06/2016



Office Use only

Comment number:

Date received: **22 JUN 2016**

Your Town – Your Future

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Consultation Document May 2016
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Email: worthinglocalplan@adur-worthing.gov.uk

Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	ALEXANDER
Last name	RICE
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Address line 2	
Address line 3	
Post Code	
Email address	

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RE QUESTIONS PAGE 32 Q11 EDGE OF TOWN DEVELOPMENT OPPORTUNITIES

I write in support of Northwiny Council's very strong feeling that

THE GORING GAP SOUTHSIDE AND CHATSMORE FARM

must be protected in development and remain as they are.

These are part of our natural heritage and are unique in the environment they present, not only to residents but also to visitors, many of whom come from miles around to enjoy the beauty and special relaxation activities that are barely available anywhere else.

Personally I walk the gap and the beach every day with my two dogs and enjoy the fresh air, and the peace and quietness all of which would be destroyed for ever and for our future generation if it were to be developed in any way.

The woodland provides sanctuary to many forms of wild life

In the past month I have seen Robins, Blackbirds, Thrushes, Gold finches, Goshawk, Wagtails, Woodpecker, Squirrels and Rabbits all in this confined area. Do we really need to deprive them of their habitat.

I accept that there is a need for further housing etc but these are right and wrong places for development.

Goring Gap is unquestionably THE WRONG PLACE.

Please continue on separate sheets as necessary

Name:		Signature	
Date:	19 TH JUNE 2016		

REFERENCE

Comment number: WIO-M-117

Date received: 22/06/2016



Office Use only

Comment number:

Date received: 22 JUN 2016

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Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	Susan
Last name	Kallend
Organisation (where applicable)	
Address line 1	
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Post Code	
Email address	

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South Side - Goring Gap and Chatsmore Farm

- 1 - This area is a habitat for many birds who are roosting or resting during migration time
- 2 - Development of this area will destroy Grade I agricultural land.
- 3 Building could increase the risk of flooding
4. Development would have a detrimental effect on the character of the landscape
5. Parking would become a major problem as would the extra traffic

These are the main reasons why I am very much against any development in this area

Please continue on separate sheets as necessary

Name:		Signature	
Date:	16 th June 2016		

REFERENCE

Comment number: WIO-M-118

Date received: 22/06/2016



Office Use only

Comment number:

Date received: **22 JUN 2016**

Your Town –Your Future

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Phone: 01903 239999

Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	PAMELA
Last name	MOSS
Organisation (where applicable)	
Address line 1	
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Goring Gap South Side
Goring Gap North Side.

Both these areas are green places essential for physical & mental health. South side is the only place in the country that farm land joins the sea. On the north side the green & 'soft' area adds to the wonderful views from the downs & Higdon Hill. The blocks of flats beside Goring station are more than enough asphalt concrete. Why spoil these green spaces.

Both areas join the river Rife & the S side in particular is very wet all winter, where would all this water go. Washing apart from a very few areas such as these is concrete, don't make it worse. Traffic in the Goring area is appalling. As a pedestrian I can take ages to cross the coast road, which has long stretches without refuges. Cars driving at high speeds is very intimidating.

Mantleds Way area
this area is difficult to see, but appears to be a space left green. I have lived in Woking since 1968 & have no idea what happens here. Again it is a green space & precious. I can't imagine how roads serving an estate of housing could cope, especially with the railway track on the north side. Would the Barrington Rd. Footpath be lost, a quiet area well used. A huge area of housing up to the Goring has already been sacrificed to concrete.

Please continue on separate sheets as necessary

Name:		Signature	
Date:	15-06-2016		



REFERENCE

Comment number: WIO-M-119

Date received: 27/06/2016

Office Use only

Comment number:

Date received: **27 JUN 2016**

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Phone: 01903 239999

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44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

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Section B - Comments

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I am responding to the Planning of
the Goring Gap - and am concerned about the
unique landscape & Flood risk and wild life

Please continue on separate sheets as necessary

Name:		Signature	
Date:	19-06-16		

REFERENCE

Comment number: WIO-M-120

Date received: 27/06/2016



Office Use only

Comment number:

Date received: **27 JUN 2016**

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22 JUN 2016

Customer Services

Section A - Contact Details

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Last name	FRANCE
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Address line 3	
Post Code	
Email address	

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Section B - Comments

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Q11 EDGE OF TOWN DEVELOPMENT OPPORTUNITIES,
THIS AREA OFFERS PEACE AND TRANQUILITY FOR
LOCALS AND VISITORS. IT IS VIRTUALLY THE LAST
REMAINING OPEN SPACE BORDERING THE SEA. MY WIFE
AND I OFTEN CYCLE HERE AND ARE ABLE TO ENJOY
THE BEAUTY OF AN UNSPOILT AREA BY THE SEA. SWIMMING,
PICNICS, BALL GAMES AND COMMUNITY CLUBS AND ACTIVITIES
DOMINATE THIS AREA, FOR IT TO BE DEVELOPED FOR
HOUSING OR ANY OTHER PURPOSE WOULD RUIN THE
CHARACTER OF GOING AND FEELING FOR EVER.

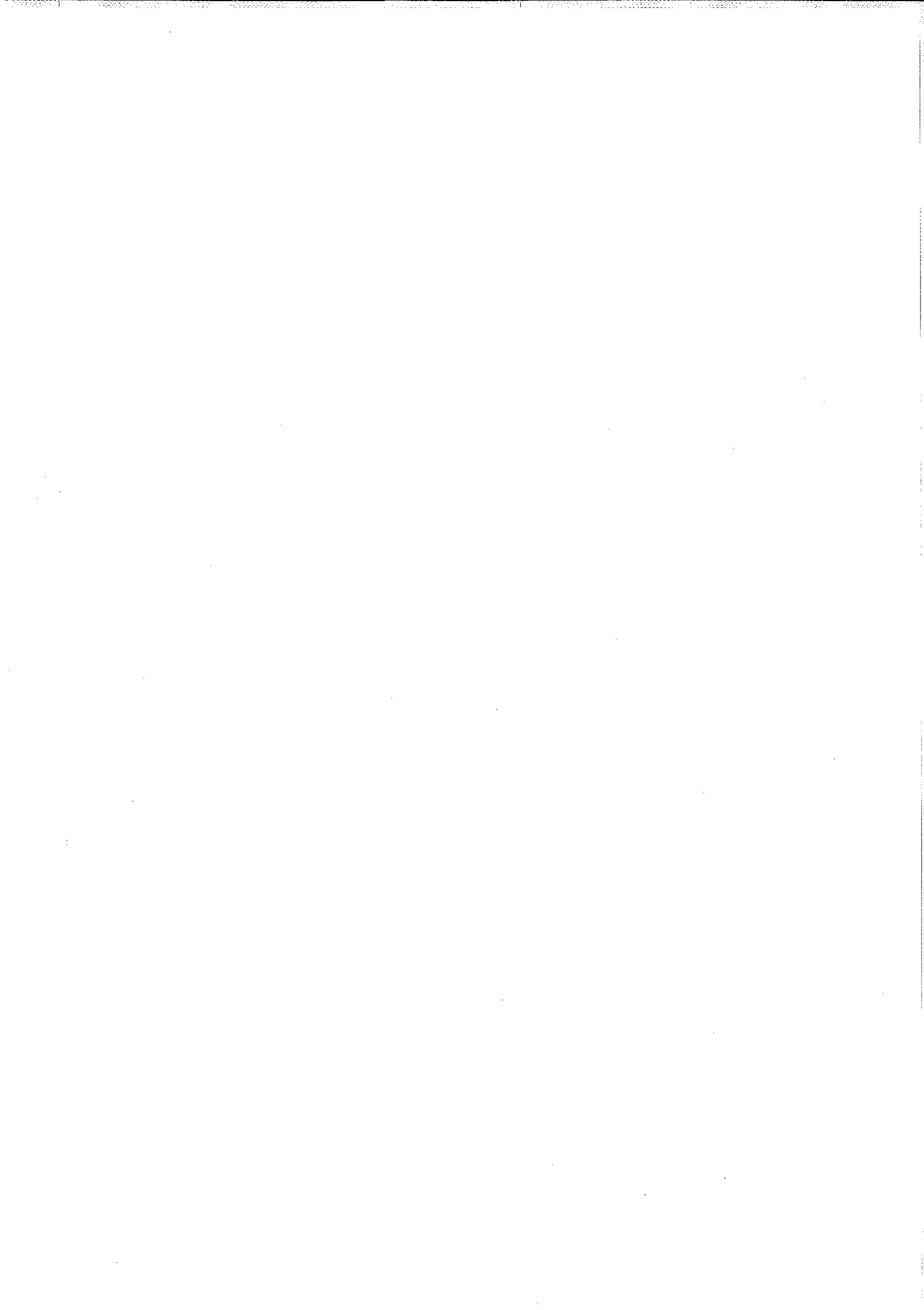
IT IS GRADE 1 AGRICULTURAL LAND ESSENTIAL
FOR THE UK TO BECOME SELF SUFFICIENT IN FOOD AND
FOR FOOD PRODUCTION SUSTAINABILITY.

ANY DEVELOPMENT WOULD CONSTITUTE A FLOOD
RISK AND THE AREA IS A PRECIOUS HABITAT FOR
SEABIRDS AND WADING BIRDS.

ANY COMMUNITY MUST HAVE UNPOLLUTED
OPEN SPACES TO BE ABLE TO ENJOY NATURE AT ITS
BEST. ANY DEVELOPMENT WOULD CONSTITUTE
ENVIRONMENTAL VANDALISM.

Please continue on separate sheets as necessary

Name:		Signature	
Date:	17-6-2016		



REFERENCE

Comment number: WIO-M-121

Date received: 27/06/2016



Office Use only
Comment number:
Date received: 27 JUN 2016

Your Town –Your Future

**A new Local Plan for Worthing
Consultation Document May 2016
Comments Form**

Worthing Borough Council has started work on preparing a new Local Plan which will have a big influence on the town in the period up to 2033. The publication of the 'Your Town- Your Future' consultation document provides the first opportunity to comment on relevant issues and options.

This consultation runs from 11th May to 22nd June 2016.

- Website: www.adur-worthing.gov.uk/worthing-local-plan
- Email: worthinglocalplan@adur-worthing.gov.uk
- Phone: 01903 239999
- Address: Planning Policy Team, Worthing Borough Council, Portland House
44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	SYLVIA
Last name	SAUNDERS
Organisation (where applicable)	CORING RESIDENTS / ST LAURENCE CHURCH
Address line 1	[REDACTED]
Address line 2	[REDACTED]
Address line 3	[REDACTED]
Post Code	[REDACTED]
Email address	[REDACTED]

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GORING GAP (South Side) GORING GAP (North side)
PAGES 28-32 CHATSMORE FARM.

These are Greenfield Sites and should remain protected. Goring Gap (N) especially would be unpleasant if built upon.

We feel (husband and I) that this gap protects the individuality of the two communities. It is a unique view from the sea. (We are regular Waverley Fravelles)

The view up to Highdown Hill South Downs is marvellous and good for the soul and spiritual refreshment.

The gap is a nesting place for sea birds.

We have lived here for 45 years.

Please continue on separate sheets as necessary

Name:	
Date:	21 June 2016.

REFERENCE

Comment number: WIO-M-122

Date received: 27/06/2016



Office Use only

Comment number:

Date received: **27 JUN 2016**

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22 JUN 2016

Customer Services

Section A - Contact Details

First name	William
Last name	Saunders
Organisation (where applicable)	—
Address line 1	[Redacted]
Address line 2	
Address line 3	
Post Code	
Email address	—

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HMRC Offices & Mautlets Way (pages 24-27)
Q10 No objection to redevelopment of these sites provided any housing is of appropriate design and includes a degree of social housing. A small amount of small business units may be acceptable.

Chatsmore Farm - (pages 28-32)
Q11. It is essential that this site should be protected from development to maintain agricultural land, prevention of ribbon development and maintain a degree of unspoilt landscape.

Graving Gap Southside (pages 28-32)
Q11. As a resident of over 40 years it is one of my delights to walk this gap and to look up to Highdown. With the tree cover of Ilex Way one has the impression of unspoilt countryside up to the South Downs - a unique opportunity and enrichment for many miles in both directions. The Gap maintains a separation of Graving and Feving, provides a habitat for migration and nesting birds and provides prime agricultural land. It provides a breathing space for urban dwellers. It must be maintained at all costs.

Please continue on separate sheets as necessary

Name:		Signature	
Date:	22/5/16		



REFERENCE

Comment number: WIO-M-123

Date received: 22/06/2016

Office Use only

Comment number:

Date received: **27 JUN 2016**

Your Town –Your Future

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Section A - Contact Details

First name	WILLIAM AND VALERIE
Last name	GRAY
Organisation (where applicable)	(GORING RESIDENTS ASSOCIATION)
Address line 1	
Address line 2	
Address line 3	
Post Code	
Email address	

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Chatsmore Farm

Highdown Hill The Famous Beauty Spot is just above Chatsmore Farm site, if any concrete or New buildings were put on this Agricultural land, there would be a great risk of flooding of the new buildings & surrounding areas.

The Ferring Rife has flooded in the past.

Rain from Highdown Hill must as with surrounding areas go somewhere!

Please continue on separate sheets as necessary

Name:	[Redacted]	Signature	[Redacted]
Date:	21-6-2016		

REFERENCE

Comment number: WIO-M-124

Date received: 27/06/2016



Office Use only

Comment number:

Date received: **27 JUN 2016**

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Section A - Contact Details

First name	DAPHNE
Last name	BRETON
Organisation (where applicable)	
Address line 1	[REDACTED]
Address line 2	
Address line 3	
Post Code	
Email address	

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Goring Gap Southside
With imagination the above area can be protected.
Rural interests could be established with tree planting undertaken by interested groups in the communities.
There is space for an educational centre, specifically based on country and sea.
The flooding could be seen as an asset to establish a Marshland Area for local and migratory birds. The R.S.P.B might be interested in a new project, also the National Trust at Highdown.
Finally the historical connection of St Mary's Goring and St Andrew's Ferring, linked by the superb flux way.
After years of agricultural use the essence of the area can be maintained for generations to come.

Please continue on separate sheets as necessary

Name:		Signature	
Date:	20/5/16		

