

Chris Thomas
Outdoor Advertising Consultant

REFERENCE

Comment number: DWLP-M-1

Date Received: 2/11/18

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

1 November 2018

Dear Sir/Madam,

**Worthing BC - Local Plan – Consultation Draft –
November 2018**

These representations are submitted on behalf of the British Sign and Graphics Association (BSGA) in response to the consultation on the above draft Local Plan document. In particular, we are concerned with Policy CP6(e) "Public Realm".

The BSGA represents 65% of the sales of signage throughout the UK and monitors development plans throughout the country to ensure the emerging Local Plan Policies do not inappropriately apply more onerous considerations on advertisements than already apply within The National Planning Policy Framework, Planning Practice Guidance and the Town and Country Planning (Control of Advertisements)(England) Regulations 2007.

We consider that supporting text paragraph 4.74, second and third sentences, encapsulate all that need be said about advertisement control policy. When read with the requirements of Policy CP5 "Quality of Built Environment" (of which advertisements are a part), the relevant considerations will apply.

Policy CP6(e), in the first sentence, properly reflects the requirements of the Advertisements Regulations in requiring regard to be had to amenity and public safety. This will include an assessment of all the attributes of any proposed advertisement. Why the last sentence of CP6(e) should particularly single out illumination for special consideration is not clear. If an illuminated advertisement causes no harm to amenity or public safety, then it must be acceptable regardless of what form of illumination it includes. And there is no question of the Council having the power to determine what is acceptable "in principle". In part, this equates to a consideration of the "need" for the advertisement in illuminated form. This is not

permitted by the Regulations as advised in paragraph ID 18b-026020140306 of Planning Practice Guidance. We therefore consider that the last sentence of Policy CP6(e) should be deleted as it implies that the Council has powers which it does not have; and it is entirely unnecessary. This first sentence of CP6(e) is adequate for the effective and proper control of advertisements in accordance with the requirements of the law and National Planning Policy and Practice.

It is hoped that these comments are found to be useful and informative, if you have any further questions, please contact me.

Yours faithfully



Chris Thomas
for British Sign and Graphics Association

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	Clive White
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General comments

I appreciate that future developments are needed but I fail to see how more housing around Lambleys Lane / A27 is a benefit. Traffic is a real problem in this area and until a proper by-pass is in place, the quality of life due to traffic pollution continues to deteriorate.

The recent installation of underground high voltage power cables and the historic public footpath which is in constant use which cross the fields will also limit its potential.

The IKEA development in Lancing will also increase the volume of traffic trying to pass through Worthing.

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	Ronald & June Sullivan
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General comments

We would like to register our support that Both the goring gaps, north and south are to be kept as green spaces and remain as a strategic gap between goring and Ferring (SP5 SP6) pages 25-37

Similarly we support worthing council in keeping the Brooklands as a local green area (SP5 & SP6-LP Pages 25-37

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	Sean Maher
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General comments

I am writing to you to confirm that I agree with the following proposals:

GORING GAP SOUTH AND GORING GAP NORTH (known as Chatsmore Farm) (SP5 & SP6-LP pages 25-37)

Brooklands - We also ask you to support Worthing Council on keeping Brooklands (SP5 & 6-LP pages 25-37) as a local green gap.

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	Graham Moore
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General comments

I wish to give my full support to the proposed plans to keep GORING GAP SOUTH AND GORING GAP NORTH (known as Chatsmore Farm) (SP5 and SP6-LP pages 25-37) as a local green space and a continued strategic gap between Goring and Ferring.

I also wish to give my full support to keeping Brooklands as a local green gap (SP5 & 6 pages 25-37)

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	Colin Pilling
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General comments

GORING GAP SOUTH AND GORING GAP NORTH (known as Chatsmore Farm)
(SP5 & SP6-LP pages 25-37)

I agree with the idea that the Council should designate and provide protection to both the Goring gap South and the North

Brooklands SP 5 and 6 LP pages 25-37. I support the Council to keep Brooklands as a local green gap

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	Ann Sharp
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General comments

GORING GAP SOUTH AND GORING GAP NORTH (known as Chatsmore Farm)
(SP5 & SP6-LP pages 25-37)

BROOKLANDS (SP5&SP6)

I should like to support the proposal to retain both of these items as open green spaces and strategic green gaps

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	David Sharp
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General comments

GORING GAP SOUTH AND GORING GAP NORTH (known as Chatsmore Farm)
(SP5 & SP6-LP pages 25-37)

BROOKLANDS (SP5&SP6)

I should like to support the proposal to retain both of these items as open green spaces and strategic green gaps

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	Rosie OHara
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General comments**BEECHES AVENUE –**

I understand that this proposal has been raised again. It was originally raised in 2004 reference number 04/00803/OUT. There is a meeting on 23/11 which I cannot make due to work commitments so I would like my objections to this planning noted please. Unless a Worthing bypass can be agreed the A27 cannot take anymore traffic, as a resident I have enough difficulty getting in and out of my road, the traffic to the Lyons Farm Superstores frequently grind to a halt and this road cannot cope with anymore cars coming at it from the north. Apart from that this area borders on the South Downs National Park and is an area of natural beauty. I have filmed the badgers and other wildlife who live on this land. Also there are horses some of which are very old who have grazed on these fields all their lives. I know my views on beauty of the land and wildlife will not be taken into account but the issue of traffic must be. The Sompting Road dairy site should have been for houses not factory units.

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	Carol & Barrie Evans
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General comments

We would like to pass on our support for the Local Plan, particularly those sections which refer to the Goring Gaps- North and South and Brooklands - SP5,SP6-LP

The preservation of Green space in the Worthing area is essential for the well being of the residents. We live in a stretch of the country which squeezes a high population into a narrow belt between the sea and The Downs. Our children need fresh air and to be able to walk to, and play in, areas which are open and safe. At all times of the year, Goring Gap is frequented by young and old alike and we believe that it would be detrimental to the health and well being of all if it were allowed to be built upon.

We believe that the need for housing could be met within current brownfield sites, however because of the awful problems we currently have in Worthing, and particularly A259, regarding traffic congestion, it would be better to postpone any new housing until there is a relief road of some description that could remove the through traffic and create a proper South Coast route.

In addition, Private housing development in the Goring Gap area would definitely not be affordable housing! Our young people need to have affordable housing in areas which are close to transport links and near to schools etc. If the Goring Gap area were redeveloped it would be with high value/ high profit housing, whatever promises the developers made!

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	Nick and Carol Harvey
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General comments

I would like to add my and my wife's support to the decision below set out in the local plan notified to me by the Goring Residents Association. This area is so important to be preserved as a green space for us and future generations, and I believe it will also contribute to the essential balance we must maintain regarding over development. I'm sure it will also be regarded as a valuable asset for the area in the future.

GORING GAP SOUTH AND GORING GAP NORTH (known as Chatsmore Farm) (SP5 & SP6-LP pages 25-37)

The GRA welcome the decision made to designate and provide protection to the Goring Gap South and Goring Gap North as a Local Green Space and a continued Strategic Gap between Goring and Ferring.

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	Mr G. K. & Mrs M. S. Ray
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General comments

We both agree and support the councils decision to designate the area known as Goring Gap South and North as a Local Green Space and a continued Strategic Gap between Going and Ferring SP5 & SP6.

Also Brooklands as a local green gap

Office use only	Date Received:
21/11/2018	
Date received	REFERENCE

Draft Local Plan for Worthing
<mailto:worthinglocalplan@adur-worthing.gov.uk?subject=Local>
Plan Consultation Document October 2018
Comments Form

**This consultation runs from Wednesday 31st October
to 5pm on Wednesday 12th December 2018**

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

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

Phone: 01273 263000

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

Section A - Contact Details

First name	Derek		
Last name	Wigzell		
Organisation			
Address line 1			
Address line 2			
Town			
Postcode		Telephone	
Email address			

Name	Derek Wigzell	Date	18/11/18
Signed			

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.

<p>Note: Unless you request otherwise (by putting a cross in the box to the right), all respondents will be added to the Worthing Local Plan consultee database and will be notified at all subsequent stages of Local Plan progression.</p>	<p>No: please don't add me</p>	
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In addition, if you would like to subscribe to the Worthing Planning Policy Newsletter (which covers a wide range of Planning Policy issues) then please put a cross in this box:	
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SECTION B – COMMENTS

As set out below, this consultation document is formed of four parts. It would be helpful if you provide your comments under the relevant sections together with relevant policy number, paragraph and page numbers. However, if your comments are more general then your comments can be inserted in the box below.

GENERAL COMMENTS

I wish to comment on the following.

Chatsmore Farm SP5 & SP6 LP pages 25-37.

I am in favour for keeping these spaces as open green areas. For the benefit of all peoples in Worthing and the surrounding area.

Brooklands SP5 & 6LP Pages 25-37.

Again, I am in favour of keeping this as a green space for the benefit of the town.

HMRC Offices Barrington Road. AOC5 LP pages 68-69 and Martlets Way AOC6-LP 70-71.

This is way of releasing a large site for much needed houses also some units. I am in favour of this. As the town needs more houses.

Leisure Centre AOC -LP Pages 66-67.

This is needed as the old one is in need of modernisation. Also, another pool must be good for the town. There needs to be bigger car park catered for as well. I am in favour of this.

Thank you for this opportunity to comment.

Sorry it is on this page but the instructions are very hard to follow.

D Wigzell

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	Pauline Nicholson
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General comments

I wish it to be known that I am supporting the following:

GORING GAP SOUTH AND GORING GAP NORTH (known as Chatsmore Farm)
(SP5 & SP6-LP pages 25-37)

The GRA welcome the decision made to designate and provide protection to the Goring Gap South and Goring Gap North as a Local Green Space and a continued Strategic Gap between Goring and Ferring.

Brooklands - We also ask you to support Worthing Council on keeping Brooklands (SP5 & 6-LP pages 25-37) as a local green gap.

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	J. Maycock
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General comments

I am writing to inform you of my support for the following areas of the plan.

- GORING GAP SOUTH AND GORING GAP NORTH -SP5 & SP6-LP pages 25-37. The decision to designate and provide protection to the Goring Gap South and Goring Gap North as a Local Green Space and a continued Strategic Gap between Goring and Ferring.
- Brooklands (SP5 & 6-LP pages 25-37) a local green gap.

It is essential to keep green spaces in the coastal plain. Not just for wild life bit for humans too. Central government must be told and made to realise that Worthing has extremely limited places to build upon. We cannot go south into the sea, neither can we go north in to the Downs National Park. There is also the added burden that more houses will put on the infrastructure especially the A27, overloaded and no sign of a proper bypass, and the A259.

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	Trevor & Jennie Rollings
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General comments**GORING AREA**

I believe it is imperative to maintain the Greensward as protected green space between Goring and Ferring.

Also, skylarks nest there.

I also believe there is a strong case for widening the cycle path between the end of the prom and Ferring. It is currently dangerous, as cyclists regularly ignore the No Cycling signs.

I am very pleased that the issue of overnight camper vans along the Greensward seems to have been addressed.

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	Jesse & Valerie Lyons
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General comments

We would like to agree to the following two proposals.

1. Goring gap south and Goring gap north. (SP5 and SP6-LP pages 25-37)

We agree to keep these areas as Local Green space.

2. Brooklands (SP 5&6-LP)

We agree to keep Brooklands as a local green gap.

Office use only	Date Received:
Comment number	23/11/2018
Date received	

Draft Local Plan for Worthing **Consultation Document October 2018** **Comments Form**

This consultation runs from Wednesday 31st October
to 5pm on Wednesday 12th December 2018

Website: www.adur-worthing.gov.uk/worthing-local-plan
Email: Please email this completed form to worthinglocalplan@adur-worthing.gov.uk
Phone: 01273 263000
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	TRANSITION TOWN WORTHING		
Address line 1			
Address line 2			
Town			
Postcode		Telephone	
Email address			

Name	ROD THICK	Date	23/11/18
Signed			

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.

Note: Unless you request otherwise (by putting a cross in the box to the right), all respondents will be added to the Worthing Local Plan consultee database and will be notified at all subsequent stages of Local Plan progression.	No: please don't add me
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In addition, if you would like to subscribe to the Worthing Planning Policy Newsletter (which covers a wide range of Planning Policy issues) then please put a cross in this box:	<input checked="" type="checkbox"/>
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GENERAL COMMENTS

In view of the recent IPCC report on climate change will the Council revise the local plan to give ~~put~~ environmental issues/carbon reduction a more prominent position especially as the IPCC report states ~~we~~ we have 12 years to sort out this major problem.

Please continue on separate sheet(s) at the end if necessary

Please continue on separate sheet(s) at the end if necessary

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	Peter R. & Jean Tooth
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General comments

SECTION SP5 & SP6 - LP GORING GAP SOUTH & GORING GAP NORTH

SP5 & 6 - LP BROOKLANDS (GREEN GAP)

Local Green Space - We ask you to protect our green areas which are of particular importance to the local communities they serve. PLEASE protect them KEEP THE GAP

AOC4 - LP WORTHING LEISURE CENTRE

We agree that with the vast amount of people using the facilities at WORTHING LEISURE CENTRE, SHAFTESBURY AVENUE, it will be beneficial to develop and improve these facilities and to include a new swimming pool on the West side of the town. The main consideration we would like taken into account is that the parking area is not decreased so that the improvements do not impinge on local residents.

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Phone: 01273 263000
Address: Planning Policy Team, Worthing Borough Council,
 Portland House, 44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	Alison		
Last name	Chapman		
Organisation			
Address line 1			
Address line 2			
Town			
Postcode		Telephone	
Email address			

Name	Alison Chapman	Date	26.11.18
Signed			

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GENERAL COMMENTS

- 1 Welcome protection of Goring Gap, north and south and Brooklands. Essential green spaces.
- 2 Would like to see acknowledgement of Goring Geensward 'Village Green ' status and protection of this.
- 3 Would like to see a real commitment to protect the shoreline and beach from detrimental development, such as extra beach huts which take away vistas and view from the many to service the needs of the few.

This box is a fixed size - please continue on separate sheet(s) at the end if necessary

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 1 - INTRODUCTION AND CONTEXT

(this 'part' includes characteristics of the borough/issues and challenges and vision & strategic objectives)

PART 2 - SPATIAL STRATEGY

(this 'part' sets out the proposed spatial strategy (what development and where) and the policies to deliver it)

I support the Council's proposals to designate and provide protection to the Goring Gap South and North(SP5), I also support the Council's proposal to protect Brooklands (SP5). Local Green Spaces are critical to the health and wellbeing of residents and also provide an attractive environment for visitors to the area which helps boost the local economy and Local Gaps are essential to protect the identity of settlements and leisure opportunities for people(and dogs!). There is no turning back the clock once these green spaces are developed, and the Council are wise to realise that even if every green space were built on then it would not meet the unrealistic targets set by Central Government

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 3 - DEVELOPMENT SITES

(this 'part' includes details of the proposed future development sites)

HMRC Offices, Barrington Road(AOC5) Worthing Leisure Centre and Martlets Way(AOC6)

- 1 Plans must be integrated and cohesive for these potential areas of development.
- 2 Sufficient regard must be given to traffic flow and management and the provision of services such as Schools and Health services.
- 3 There should be adequate parking for residents and integral green areas/play facilities
- 4 Developments should be sympathetic with existing buildings and should not exceed the height of buildings in neighbouring areas
- 5 There should be a focus on reducing carbon footprint with eco friendly, sustainable buildings and limitations on air and road pollution
- 6 Existing trees and green spaces should be protected
- 7 A new swimming pool would be welcomed at Worthing Leisure Centre.
- 8 Efforts should be made to maintain the provision of other leisure services at the Leisure Centre while building work going on

PART 4 CORE POLICIES - HOMES AND NEIGHBOURHOODS **(Policies CPI – CP6)**

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	Mr & Mrs M. Beesley
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General comments

Arun Plan safeguards parts of both parts of the Gap that are within the Borders and that it is Vital to give the Worthing areas the Protection -for its Landscapes, Wildlife it's Tranquillity and it's clear break between the built up Areas along our Coast.

Office use Only:	
Comment number	DWLP-M-22
Date received	28/11/18

Draft Local Plan for Worthing Consultation Document October 2018 Comments Form

**This consultation runs from Wednesday 31st October
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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: 01273 263000

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

Section A - Contact Details

First name	Barbara		
Last name	Wills		
Organisation			
Address line 1			
Address line 2			
Town			
Postcode		Telephone	
Email address			

Name	Barbara Wills	Date	28/11/18
Signed	B Wills		

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.

Note: Unless you request otherwise (by putting a cross in the box to the right), all respondents will be added to the Worthing Local Plan consultee database and will be notified at all subsequent stages of Local Plan progression.	No: please don't add me	X
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GENERAL COMMENTS

I have read the Local Plan and my comments are:

I agree and support the decision to protect the green areas on your map. As one of the largest towns in West Sussex Worthing does need a new Sports Centre. The Greensward's designation of Village Green must be observed and upheld and development which restricts this use or any development which will restrict the enjoyment and sea views along the foreshore should not be allowed, e.g. more beach huts. These draft plans would meet the priorities promoting healthy lifestyles, mental health awareness and tackling loneliness.

I have concerns that the Marine Parade car park, Civic Centre car park, Grafton car park, Union Place car park and Teville Gate car park are all earmarked for housing development but there is no indication if or where these town centre car parking spaces will be re-sited or where the Council Workers at the Civic Centre, people attending the Assembly Halls or the Dome Cinema will be able to park. Also what will happen to the Bowling Alley. There is no sense behind developing Worthing Town if no-one goes there. Your local economy draft plan states tourism is of significant importance to the local economy and visitor attractions should be supported especially those that provide 'all year round activity'.

Finally with all the extra housing and local development, e.g. Shoreham, what is being done about huge congestion on the roads. It is almost impossible to move around or get to or leave Worthing without sitting in traffic (which adds to pollution) and this applies most times of the day and not only at peak times.

This box is a fixed size - please continue on separate sheet(s) at the end if necessary

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	D Guile
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General comments

I wish to comment regarding Sections SP5 and SP6 (LP).

I am fully in favour of these areas being designated as Local Green Space and a continued Strategic Gap. The thought of housing appearing at these sites is most alarming and would be of significant detriment to the town and it's citizens.

23 November 2018

Dear Sir / Madam

**Worthing Council: Draft Worthing Local Plan Consultation
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Wood 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:

Hannah Lorna Bevins
Consultant Town Planner

n.grid@amecfw.com

Wood E&I Solutions UK Ltd
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]

Hannah Lorna Bevins
Consultant Town Planner

cc. Spencer Jefferies, National Grid

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	Nicola Hoy
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General comments

I understand that you are reviewing the status of the two areas of open land called Goring Gap and Chatsmore Farm. I would urge you to preserve these areas of land as they currently are, wonderful open farming areas that are havens for wildlife and and for people to enjoy.

The southern Goring Gap is the only piece of undeveloped farmland along the coastal strip of Sussex and is enjoyed by locals and visitors alike.

It forms a wonderful break between what has become a concrete jungle. Our local roads and services are currently at breaking point and building hundreds of new dwellings in both these open spaces would massively add to this problem, adding nothing of value to the environment in the area and depriving people and wildlife of the rural habitat that the spaces currently offer. At he moment both areas are being used for growing crops, something we should be looking to preserve in light of climate change, ensuring locally produced food is available for local shops. Added to this with the threat of rising sea temperatures and sea levels the southern Goring Gap could be badly effected if it were to be built on.

It's not only local people who use the areas daily to walk their dogs, enjoy the environment for fresh air, exercise and photographing the abundant wildlife, during the summer months visitors come from far and wide to the southern Goring Gap to enjoy the beach and surrounding rural area. It's not overdeveloped but discreetly has all the facilities; toilets, shower, cafes within striking distance for them to really enjoy a rural day out, it's been like this for over 60 years. In these days of high stress living it would be madness to erode another piece of tranquility.

[REDACTED]

[REDACTED] I have lived in the road for over 50 years. I, along with many other people, have enjoyed the rural aspect of this area since I was a child, my own children grew up here and made the most of the trees, beach and fields to enjoy nature. It would be a terrible shame to deprive future generations of such a beautiful place to live, therefore I would urge you to protect the whole of this land for prosperity.

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	Antony Hart
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General comments

Goring Gap (SP5 & SP6-LP pages 25-37) Agree decision to provide protection as local green space. No commercial development should be considered. EVER!!

Brooklands (SP5&6 pages 25-37) should also be maintained as a green gap. I have some sympathy for the retention of the Go-cart facility and the train tack around the lake.

Worthing Leisure Centre (AOC4-LP pages 66/7). I am all for regeneration. Let's not repeat the mistakes of Splash point. Build a proper 50M pool!! Function over architectural design! Let's have good parking (the current parking overflows into neighborhood on occasion), a proper crèche. No loss of current activities / facilities / playing fields. Do something regarding exit from car park, the current arrangement is quite dangerous. Stop non users of the Leisure centre parking there. You hound car parkers elsewhere in town why not here where it abused daily. I don't believe there is sufficient area for much housing without compromising the intended purpose of the Leisure Centre.

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	Geoffrey & Margaret Trueman
------	-----------------------------

General comments

Goring Gap South and Goring Gap North - We support Worthing Borough Council's decision to designate and provide protection to the Goring Gap South and the Goring Gap North as a local Green Space and a continued Strategic Gap between Goring and Ferring.

Brooklands - We also support Worthing Borough Council on keeping Brooklands as a local green gap.

HMRC Offices, Barrington Road and Martlets Way - We support the regeneration but we would request no high rises which would overshadow existing residential properties and also there would have to be junction improvements at Barrington Road/ Shaftesbury Avenue.

Worthing Leisure Centre - We support the provision of a new Leisure Centre, swimming pool, sports hall and fitness centre and housing with adequate on-site parking.

GORING RESIDENTS' ASSOCIATION

Est: 1944

www.goringresidents.org.uk

REFERENCE

Comment No: DWLP-M-28

Date Received: 01/12/18

Chairman

Mrs Eleanor Millward

Planning Policy Team
Worthing Borough Council
Portland House
44 Richmond Road

26th November 2018

WORTHING LOCAL PLAN

Goring Residents' Association is a well-established resident's membership organisation (founded in 1944). About 25% of Goring residents are members. One of our aims is to preserve and enhance the amenities of Goring.

GORING STRATEGIC GAP - South and North (known as Chatsmore Farm)

The Goring Residents' Association (GRA) welcomes the Worthing Borough Council's decision to designate and provide protection to the Goring-Ferring strategic gap. We also thank them for recognising the input from the GRA who provided documented information to make these areas a Local Green Space (2.60/2.69/2.73). The request for this was formally presented to WBC in June 2014.

The GRA will gladly support WBC's belief that -

- These Local Gaps (SP5) are important in preserving Worthing's character and identity by preventing settlement coalescence
- These Local Gaps (SP5) are the only part of the undeveloped coastline between Littlehampton and Roedean which provides a visual connection between the undeveloped coastline and the South Downs National Park
- The Local Gap (North) (SP5) has substantial ecological value with rare and protected birds and bats
- These Local Gaps (SP5) offer people leisure activities which promote health and well-being in our community
- These Local Gaps (SP5) have informal footpaths that allow locals and visitors to walk and exercise their dogs.
- These Local Gaps become designated as a Local Green Space (SP6) which will help protect this area for future generations
- This Local Gap (SP5) and Local Green Space (SP6) is valued for its historic association, views, wildlife and bird-watching, black skies to enjoy stargazing and tranquillity which is not found in other parts of Worthing due to it being built up.
- This Local Green Space (SP6) is a valued place for relaxation and exercise

The GRA would not support, at this time, approval for any structures associated with any informal or formal recreation activities which could damage qualities for which the Local Gap and Local Green Space is valued.

The Greensward - Village Green status (CP8)

The GRA note the WBC recognises the demand for parks and open spaces. With reference to this commitment, the GRA request that specific recognition of the Goring Greensward's Village Green status with its associated legal protection is identified in the plan

The Coastline (CP13)

The GRA is concerned that the natural coastline with its associated vistas and access to views are protected for the enjoyment of Worthing Residents and visitors. This not only enhances the wellbeing of residents and visitors, it is also a causal factor in people choosing to live in and visit Worthing and a major contributor to the local economy.

The GRA would definitely object should WBC continue with their plans on increasing the beach huts from George V to Sea Lane Café.

Worthing Leisure Centre, Shaftsbury Avenue (AOC4)

HMRC Offices, Barrington Road (AOC5)

Martlets Way (AOC6)

At this time, until detailed plans are available, the GRA will neither support nor object to potential development for Worthing Leisure Centre, HMRC offices or Martlets Way. However, we ask the Council to ensure

- A cohesive plan between these areas
- No high rise buildings which overshadow existing residential properties
- Junction improvements at Barrington Road/Shaftsbury Avenue
- Junction improvements from the leisure centre to Shaftsbury Avenue
- Junction improvements on the Martlets Way development
- Adequate onsite parking for residents, workers and those using leisure facilities
- Employment units will not impinge on local residents with noise or pollution
- Adequate amenities such as schooling, doctors, transportation links etc., are considered prior to any regeneration taking place

Brooklands Recreation Area (SP5) and (SP6)

The GRA will definitely support WBC with their plans on making Brooklands Park into a Local Green Gap and Local Green Space

The GRA would like to thank Worthing Borough Council for their continued commitment to Goring and with the things that the residents hold dear and what makes Goring - Goring.

Yours faithfully

Eleanor Millward

Eleanor Millward (Chairman)
for and on behalf of the GRA committee

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	Jan Anderson
------	--------------

General comments

I am writing to support the Local Plan SP5 and SP6 as my husband and I place great value on the Goring-Ferring Gap and Chatsmore Farm as both a Local Green Gap and Local Green Space for their informal recreation, tranquility, important views and wildlife.

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	Rosemary Bayes
------	----------------

General comments

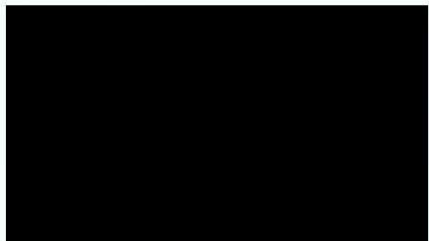
Many thanks for your decision concerning the Goring Gap. I am a resident of Goring and very much appreciated your decision.

29/11

REFERENCE

Comment No: DWLP-M- 31

Date Received: 29.11.18



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

27th November 2018

Dear Sir,

In reference to policies SP5 and SP6 for both the Ferring - Goring Gap and Chatsmore Farm.

I wish to give total support designating both areas as Local Green Space (SP6) as they play such an important part of our lives in terms of Local Green Space for wildlife, informal recreation, tranquillity and important views.

These areas are so important in maintaining the unique environment we so cherish in our community and to protect them would greatly enhance the chances of future sustainability for generations to come.

Yours faithfully

A black rectangular redaction box covering the signature of David J Phipp.

David J Phipp

REFERENCE

Comment No: DWLP-M- 32

Date Received: 29.11.18

29/11

Worthing Borough Council

Planning Policy

Portland House

44 Richmond Road

Worthing BN12

Sir / Madam

We fully support the proposal in The Draft Worthing Local Plan for designating the Goring – Ferring Gap and Chatsmore Farm as both a Local Green Gap and Local Green Space.

These areas are greatly valued by those who use them. And by most for their intrinsic value as natural space.

Yours sincerely

Alfred Franklin

Mark Franklin

PLANNING Policy TEAM,
WORTHING BOROUGH COUNCIL,
FORNAND HOUSE,
44, RICHMOND ROAD,
WORTHING
BN11 1HS.

REFERENCE

Comment No: DWLP-M- 33

Date Received: 29.11.18

29/11

WORTHING LOCAL PLAN

Dear Sirs,

My wife and I attended the last session
you held in the Gorda Room and gained more of
an understanding on the overall plan.

Our comments on the relevant sections are as
follow:-

Brooklands (SP5 and 6-LP) - we agree with the Council
Chatsmore Farm (SP5 and SP6-LP) - we agree with the
Council. The gap must be preserved and protected.

Marine Offices (AOc6-LP) and Worthing Leisure Centre
(AOc4-LP). We can neither support nor object to
these until detailed plans are available.

Yours faithfully,

(M.F. WISHTMAN)

REFERENCE

Comment No: DWLP-M- 34

Date Received: 29.11.18

27 November 2018

Dear Sirs

I would like to whole heartedly **support** the Local Plan which seeks to designate the **Goring-Ferring Gap and Chatsmore Farm as both a Local Green Gap (SP5) and Local Green Space (SP6)**. The Gap and the Farm offer unrivalled and totally unique areas for wildlife, informal recreation, tranquillity and important views.

It would be a tragedy if this iconic and unique piece of unspoilt ground were not conserved as an area of natural beauty and as an environment for local wildlife. By protecting these areas it will also ensure that the avenue of trees leading up to Goring Hall are also safeguarded.

The Goring Gap acts as natural water drainage.

One of the joys of this area is to see so many people enjoying a myriad of activities. This area is enjoyed not only by residents, but also by all Worthing locals and equally importantly, people from further away. Just to walk along the coast with its uninterrupted view of the Downs is both special and unique in this area and is why it attracts so many visitors from far and wide and helps to put Worthing "on the map" as the saying goes.

I definitely support the plan to designate the Goring-Ferring Gap and Chatsmore Farm as both a Local Green Gap (SP5) and Local Green Space (SP6).

Yours sincerely

D C Austin (Mrs)

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	J M Lee
------	---------

Comments: Development Sites

Beeches Avenue – A number of concerns are raised with regards to the potential development of this field. This includes reference to historic ownership issues.

REFERENCE

Comment No: DWLP-M- 36

Date Received: 30.11.18

30/11

29th November 2018

Dear Sir

Worthing Local Plan
Goring Gap South + Goring Gap North

I very much support the Council's decision ~~not~~^{to} protect Goring Gap South and Goring Gap North as a Local Green Space and a continued Strategic Gap between Goring and Ferring.

This is a beautiful area that needs to be preserved. I value it highly - as do very many others in the local community.

Yours faithfully

**Draft Local Plan for Worthing
 Consultation Document October 2018
 Comments Form**

**This consultation runs from Wednesday 31st October
 to 5pm on Wednesday 12th December 2018**

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

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

Phone: 01273 263000

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

Section A - Contact Details

First name	John		
Last name	Darcy		
Organisation	/		
Address line 1	[REDACTED]		
Address line 2	[REDACTED]		
Town	[REDACTED]		
Postcode	[REDACTED]	Telephone	[REDACTED]
Email address	[REDACTED]		
Name	John Darcy	Date	28.11.18
Signed	[REDACTED]		

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

Note: Unless you request otherwise (by putting a cross in the box to the right), all respondents will be added to the Worthing Local Plan consultee database and will be notified at all subsequent stages of Local Plan progression.	No: please don't add me	<input type="checkbox"/>
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In addition, if you would like to subscribe to the Worthing Planning Policy Newsletter (which covers a wide range of Planning Policy issues) then please put a cross in this box:	<input checked="" type="checkbox"/>
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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. However, contact details will not be published. Unfortunately, we cannot accept or report confidential or anonymous responses. Further information about how personal information is processed can be found on the Council's website in the Planning Policy Privacy Notice:

<https://www.adur-worthing.gov.uk/planning-policy/privacy-notice/>

All data will be stored securely in line with the GDPR.

SECTION B - COMMENTS

As set out below, this consultation document is formed of four parts. It would be helpful if you provide your comments under the relevant sections together with relevant policy number, paragraph and page numbers. However, if your comments are more general then your comments can be inserted in the box below.

GENERAL COMMENTS

Re Teville Gate, Gas site, Stage road site, Connaught
Site.

Is it appropriate to allow any more retail? We know
retail is going through a fundamental structural
change, any new retail will probably serve to
further weaken already struggling existing retail. I
would suggest that to protect existing retail and no
new retail is permitted or alternatively that any
new retail is ~~restricted~~ by an square foot reduction
in ~~existing~~ existing provision.

Re Letwin Road Housing.

Is further retirement housing really needed? Currently
there is a glut of 2nd hand retirement flats on
the housing market in Worthing, as an internet tour
I found over 100 same type for under £100K within
a few minutes.

Please continue on separate sheet(s) at the end if necessary

Please continue on separate sheet(s) at the end if necessary

PART 1 - INTRODUCTION AND CONTEXT

(this 'part' includes characteristics of the borough/issues and challenges and vision & strategic objectives)

STUDIO FLATS.

There is a crisis in student accommodation for single people.
Why is this not specifically referred to in the plan.
~~From~~ A similar internal brief (see retirement homes)
shows 23 properties available 3 of which are at
the government single person rate allowed for a 1 bed
flat. ~~For~~ In the last 10 years just 50 studio
flats have been granted P.P. I suggest the demand
should be established and a specific policy put in
place to meet that demand. I am aware
that current minimum space standards for studios

PART 2 - SPATIAL STRATEGY

(this 'part' sets out the proposed spatial strategy (what development and where) and the policies to deliver it)

flats need consideration in economic hence the
lack of provision. I suggest that specific steps
be taken to address this deficiency within
the plan.

GENERAL

Having said all of the above I ~~think~~ think
that overall this is an excellent plan and
those who put forward it are to be complemented
on it.

Please continue on separate sheet(s) at the end if necessary

PTO

PART 3 - DEVELOPMENT SITES

(this 'part' includes details of the proposed future development sites)

Do you think it is realistic in the
current high speed / developed world to set
so much fixed ~~to~~ for 5 years. Could not
an annual review of essential components. i.e.
housing needs
retail needs.
structural business changes.
be factored in to respond to changes in requirements.

28.11.16

PART 4 CORE POLICIES - HOMES AND NEIGHBOURHOODS (Policies CPI - CP6)

Please continue on separate sheet(s) at the end if necessary

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	John Davey
------	------------

General comments:

I understand that before adoption of minimum space standards for flats and houses WBC should demonstrate need and viability through testing and assessment. Has this been done and if so how is it that policies dont appear to address the chronic shortage of single person accomodation available in the town.

Comments: Local Economy and Transport & Connectivity

What is being done to allocate sites for local 'infrastruncrue' organisations such as Compass Travel, these are public 'amenities' and can't necessarily sustain full commercial rates for the large parking areas needed for their fleets of buses.

Comments: Part 4 - Core Policies: Transport and Connectivity

see previous comment re bus parking



WORTHING BOROUGH
COUNCIL



REFERENCE

Comment No: DWLP-M- 38

Date Received: 03.12.18

Draft Local Plan for Worthing Consultation Document October 2018 Comments Form

This consultation runs from Wednesday 31st October
to 5pm on Wednesday 12th December 2018

Website: www.adur-worthing.gov.uk/worthing-local-plan
Email: Please email this completed form to worthinglocalplan@adur-worthing.gov.uk
Phone: 01273 263000
Address: Planning Policy Team, Worthing Borough Council,
Portland House, 44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	ANN		
Last name	GLY		
Organisation			
Address line 1			
Address line 2			
Town			
Postcode		Telephone	
Email address			

Name	MRS. ANN GLY.	Date	1/12/2018.
Signed			

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

Note: Unless you request otherwise (by putting a cross in the box to the right), all respondents will be added to the Worthing Local Plan consultee database and will be notified at all subsequent stages of Local Plan progression.	No: please don't add me	
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1/12/2018
Worthing Borough Council
Planning Policy
Portland House
44 Richmond Road
Worthing.
BN11 1HS

Ref; Policies SP5 & SP6

Dear Sir /Madame

It has been brought to my notice that Persimmon is seeking to challenge policies SP5 and SP6.

I have been living within a short distance of Ilex way for over twenty years, I have walked my dog many long hours enjoying our lovely green spaces, being able to walk to the beach through the fields is a privilege I do not want loose.

There are many young families that use the recreation areas to cycle around the paths, we do not have a lot of amenities for youngsters in and around Worthing we need our Local Green Gaps and should not be deprived of them in any circumstances.

The sheer thought of losing our quite tranquil spaces where we all enjoy walking and looking at the magnificent trees fills me with horror ! I'm sure some of the trees must have preservations on as they are so large and important to our local wildlife which needs to be cherished for future families.

WE NEED OUR GREEN PLACES AND WILL FIGHT TO KEEP THEM.

Yours sincerely,



Mrs ANN GHY.

REFERENCE

3/12

Comment No: DWLP-M- 39

Date Received: 03.12.18



1/12/2018

Worthing Borough Council
Planning Policy
Portland House
44 Richmond Road
Worthing.
BN11 HIS

Ref; Policies SP5 & SP6

Dear Sir /Madame

It has been brought to my notice that Persimmon is seeking to challenge policies SP5 and SP6.

I have been living within a short distance of Ilex way for over twenty years, I have walked my dog many long hours enjoying our lovely green spaces, being able to walk to the beach through the fields is a privilege I do not want loose.

There are many young families that use the recreation areas to cycle around the paths, we do not have a lot of amenities for youngsters in and around Worthing we need our Local Green Gaps and should not be deprived of them in any circumstances.

The sheer thought of losing our quite tranquil spaces where we all enjoy walking and looking at the magnificent trees fills me with horror ! I'm sure some of the trees must have preservations on as they are so large and important to our local wildlife which needs to be cherished for future families.

WE NEED OUR GREEN PLACES AND WILL FIGHT TO KEEP THEM.

Yours sincerely,



MR JAMES ALBERT Guy

~

REFERENCE

Comment No: DWLP-M- 40

Date Received: 04.12.18

December 2, 2018

Worthing Borough Council,
Planning Policy,
Portland House,
44 Richnond Road,
Worthing
BN11 HIS

Dear Sirs,

Ref Local Plan for Goring-Ferring Gap and Chatsmore Farm

We entirely agree that the above areas should be designated as Local Green Gaps (SP5) and Local Green Spaces (SP6). We moved to this area from London because it provided the green spaces, pleasant walks by the sea and views, upon which we place great value. We would be most disappointed if the area was developed as potential building land.

Yours faithfully,

Gerald C Sweet

Pamela I Sweet

Worthing Borough Council LOCAL PLAN SP5 and SP6 for Goring Gap

WBC is proposing to designate the Goring Gap and Chatsmore Farm as Local Green Gap/Local Green Space areas. As residents of the Greensward (in itself part of the Gap), we wholeheartedly endorse these proposals. Why? Because they are nationally recognised as areas of natural beauty and tourist attractions, and a much-needed rural break between the highly developed areas to the east (Worthing) and to the west (Ferring, Littlehampton). To reduce or deface them would reduce or deface the overall tourist values of the entire area.

We recognise the pressures on all communities (whether or not locally such pressures can be justified, given the geographic limitations on building space - far better to urgently tackle the UK's current immigrant rate of over 200,000 pa) to provide more and more housing. Especially as there remain many brownfield sites and unoccupied facilities/areas within the towns of Worthing and Ferring. Nevertheless to scour unique natural breaks such as the Gap would detract from rather than enhance Worthing's perceived destination values, thereby having adverse effects on the town's finances.

Tourist perceptions of the area? Taking as examples

1 - <https://www.thebeachguide.co.uk/south-east-england/west-sussex/goring-beach.htm>

The 'Beach Guide' quotes the Gap as 'your classic West Sussex beach; a long stretch of pebbles and shingle, beyond which is an expanse of flat sand, and to the rear of which is a large grassy area, separated from the beach by a narrow paved area running from the Bluebird café past Sea Lane Cafe to Worthing. Much of this path is lined with traditional wooden beach huts. Unlike some of its south coast neighbours Goring has avoided many of the tackier seaside town developments. Instead of amusement arcades you are more likely to find fishing boats pulled up on Goring beach'.

2 - www.goring-by-sea.uk.com/

Goring is praised within Worthing websites: 'Goring has record sunshine each year. Between Goring and Ferring is an expanse of trees and green fields called the Goring Gap, a strategic separation to hold back the tide of houses, fiercely protected by the Goring Gap Preservation Trust. The mile-long Ilex Avenue runs from Goring church to Ferring, glorious, evergreen holm oaks, the finest planting of such trees in England. And from the avenue down to the sea are three more avenues of trees, down Sea Lane Goring, down Sea Lane Ferring, and down The Plantation where only walkers are welcome. There are no hotels, no slot machines, no candyfloss. Just a row of beach huts, and three excellent cafes. Fishing boats are hauled up above the high water mark. The beach is good for swimming around the high tide, and excellent for sailing, jet-skis, and at low tide for horses galloping in the surf. A wide expanse of neatly mown grass attracts school and church outings on summer weekends, flyers of kites, and dog walkers every day, rain or shine'.

Who in their right mind would deface such a gem? No, the proposal has our full support.

M&J Blackwell

REFERENCE

Comment No: DWLP-M- 41

Date Received: 04.12.18

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	John & Rosemary Munson
------	------------------------

General comments

We have read the suggested local plan and agree with plans to protect Goring Gap South and North and to keep Brooklands as a local green gap.

We do have concerns about development of Worthing Leisure Centre and HMRC as this will increase traffic in an already busy area as well as putting strain on local services i.e. Schools, doctors also impinging on noise and pollution levels.

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	Mike & Anne Taylor
-------------	--------------------

General comments

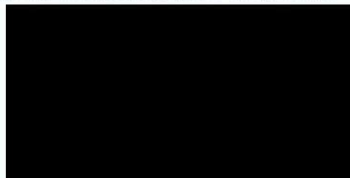
We are writing to confirm our support for Worthing Council Proposal to designate and provide protection to the goring gap south and goring gap north as a local green space and a continued strategic gap between goring and ferring (known as Chatsmore farm) SP5-SP6-LP pages 25-37).

REFERENCE

Comment No: DWLP-M-44

Date Received: 06.12.18

Mr M Hodiak & Mrs A Hodiak



Worthing Borough Council
Planning Policy
Portland House
44 Richmond Road
WORTHING
West Sussex
BN11 1HS

RE:- The Draft Worthing Local Plan - Goring-Ferring Gap and Chatsmore Farm Local Plan

We are writing to support the Draft Worthing Local Plans designation for Goring-Ferring Gap and Chatsmore Farm as both a 'Local Green Gap' (SP5) and a 'Local Green Space' (SP6).

Both these areas are of outstanding natural beauty and support a rich and varied wildlife, such as, migrating birds, informal recreation, tranquillity and on top of all that stunning and important views to the sea and to the South Downs looking North with no interruption in view, an exceptionally fine feature.

Persimmon Homes should in no way be allowed, ever, to build on either of these strategic sites of outstanding and natural beauty. They should be saved, protected and preserved for everyone to enjoy currently and more importantly for future generations.

Yours Sincerely



Mr M Hodiak & Mrs A Hodiak

Ref. Green Gap.
Goring-Fleming and
Chatsmore Farm.
C

27th Nov. 2018

Do you realise how much
these areas are enjoyed and
loved by Locals and Visitors?

I was particularly horrified
that the appalling Company
Pettimmons wanted the land. Not
a house builder to be admitted.

PLEASE please let this
gorgeous area be protected.

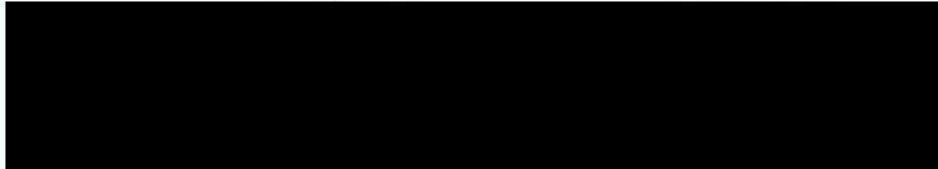
Many thanks
Regards

REFERENCE

Comment No: DWLP-M- 45

Date Received: 06.12.18

3 December 2018



REFERENCE

Comment No: DWLP-M- 46

Date Received: 06.12.18

Draft WORTHING Local Plan

Dear Sir

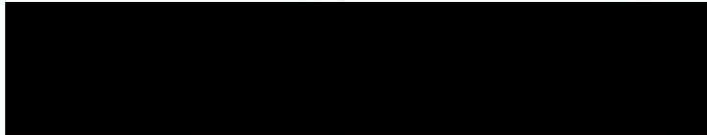
Goring-Ferring Gap and Chatsmore Farm

I understand that the proposed plan seeks to designate these areas **SP5** and **SP6** as both a Local Green Gap and a Local Green Space.

I am writing to support this proposal: I and local residents place great value on these areas as both local green gaps and local green space for their wildlife, informal recreation, tranquillity and unfettered views of sea and downland.

I hope these designations will be finalised successfully.

Yours faithfully



(Terence Chapman)

REFERENCE



Comment No: DWLP-M- 47	
Office use Only:	
Date Received: 06.12.18	
Date received	

Draft Local Plan for Worthing Consultation Document October 2018 Comments Form

**This consultation runs from Wednesday 31st October
to 5pm on Wednesday 12th December 2018**

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

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

Phone: 01273 263000

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

Section A - Contact Details

First name	KATHRYN		
Last name	WALKER		
Organisation			
Address line 1			
Address line 2			
Town			
Postcode		Telephone	
Email address			

Name	KATHRYN WALKER	Date	28/11/2018
Signed			

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.

Note: Unless you request otherwise (by putting a cross in the box to the right), all respondents will be added to the Worthing Local Plan consultee database and will be notified at all subsequent stages of Local Plan progression.	No: please don't add me	<input type="checkbox"/>
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In addition, if you would like to subscribe to the Worthing Planning Policy Newsletter (which covers a wide range of Planning Policy issues) then please put a cross in this box:	<input type="checkbox"/>
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PART 1 - INTRODUCTION AND CONTEXT

(this 'part' includes characteristics of the borough/issues and challenges and vision & strategic objectives)

Environment

page 14.

I support Policy S015 - to protect and where possible enhance valued green spaces, stretches of undeveloped coastline, gaps between settlements and the quality of the natural environment

and Policy S017 - make efficient use of previously developed land in recognition of the environmental and physical constraints to development posed by the sea and the South Downs.

PART 2 - SPATIAL STRATEGY

(this 'part' sets out the proposed spatial strategy (what development and where) and the policies to deliver it)

Page 19.

I support Policy SP2 iii Open Spaces/Countryside/Gaps

I support Policy SP5 (Page 30) to preserve the Local Green Gaps.

Page 31

para 2.62 - There is an error in this paragraph. It states: 'The view to the north provides a visual connection between the undeveloped coastline and the South Downs National Park as the substantial oak avenue along Ilex Way obscures the settlement in between. It is not Ilex Way. Ilex Way is the two roads on either side of The Ilex Avenue between Goring Church and Aldsworth Avenue. The correct name is THE ILEX AVENUE, which stretches to Sea Lane Ferring.

I support Policy SP6 (page 36) as sites of local Green Space, particularly the Goring-Ferring Gap and Chasemore Farm.

Please continue on separate sheet(s) at the end if necessary

PART 3 - DEVELOPMENT SITES

(this 'part' includes details of the proposed future development sites)

Page 71 OSI: Land East of Titnore Lane

I would not like to see the development of this site as I believe that any development would lead to the potential widening of Titnore Lane, compromising the adjacent South Downs National Park and the adjoining ancient woodland and the valuable wildlife associated with Titnore and Goring Woods.

The West Durrington housing development required the implementation of a large scheme of sustainable urban drainage, which had to be overseen by the Environment Agency. This development has not yet been completed so the provisions of a SUDS scheme has not yet been confirmed as adequate to prevent flooding or evaluated. The potential for flooding elsewhere as a result of this development has not been tested.

PART 4 CORE POLICIES - HOMES AND NEIGHBOURHOODS (Policies CPI - CP6)

Please continue on separate sheet(s) at the end if necessary

**PART 4 CORE POLICIES – HISTORIC ENVIRONMENT
(Policies CP15 – CP16)**

Page 139

CP15 A strategic approach to the Historic Environment.
I am in support of the Council's policy

Page 140

CP16 The Historic Environment.
I am also in support of this Council Policy.

**PART 4 CORE POLICIES – ENVIRONMENT AND CLIMATE CHANGE
(Policies CP17 – CP23)**

Page 150 CP19 Biodiversity.

I am in support of this policy particularly

- c) Proposals for local Wildlife Sites
(including ancient woodlands, ancient/veteran trees, wildlife corridors and stepping stones) and
- g) Tree Planting and the protection of trees with the Tree Preservation Orders (page 151)

Page 155 CP21 Flood Risk and Sustainable Drainage. I support the aims of this policy but SUDS schemes need to be evaluated by technical expertise such as The Environment Agency.

Page 158 CP22 Water Quality and Protection

I support all the aims of this policy.

Please continue on separate sheet(s) at the end if necessary

Comment No: DWLP-M- 48

Date Received: 06.12.18


Wednesday, 5 December 2018

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

Dear Sir / Madam

The Draft Worthing Local Plan

I support the designation of the Goring-Ferring Gap and Chatsmore Farm as both a Local Green Gap (SP5) and Local Green Space (SP6).

These areas are of vital importance in terms of providing green space for wildlife, recreation, tranquillity and important views.

I do not support the development of the site 'Land East of Titnore Lane'. The site abuts ancient woodland, the SDNP plus there are concerns about access and flooding.

Yours faithfully


Susan Gill

REFERENCE

Comment No: DWLP-M- 49

Date Received: 06.12.18

5/12



Wednesday, 5 December 2018

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

Dear Sir / Madam

The Draft Worthing Local Plan

I support the designation of the Goring-Ferring Gap and Chatsmore Farm as both a Local Green Gap (SP5) and Local Green Space (SP6).

These areas are of vital importance in terms of providing green space for wildlife, recreation, tranquillity and important views.

I do not support the development of the site 'Land East of Titnore Lane'. The site abuts ancient woodland, the SDNP plus there are concerns about access and flooding.

Yours faithfully



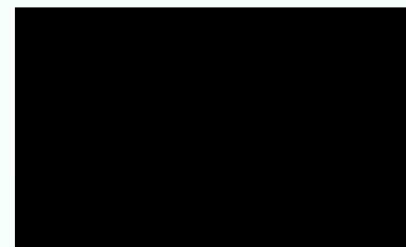
Jessica Gill

REFERENCE

Comment No: DWLP-M- 50

Date Received: 06.12.18

G/12



4th December, 2018

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

Dear Sirs,

**Draft Worthing Local Plans for: Goring-Ferring Gap and Chatsmore Farm
- Local Green Gap (SP5) and Local Green Space (SP6)**

We understand you are presently considering the above Policies in relation to the Goring-Ferring Gap and Chatsmore Farm areas.

In drawing up these Plans, we should be grateful if you would take into consideration how much we, and many others, value these open spaces which give protection to our wildlife and are the only remaining open spaces in this area giving an unbroken view between the coast and up to the South Downs. To remove this natural landscape would destroy the local environment for ever.

We do feel very strongly on this subject and urge you to take into account the wishes of present local residents for themselves and for their families for the future.

Yours faithfully,



D. Beechinor and M. Beechinor (Mrs)

REFERENCE

Comment No: DWLP-M- 51

Date Received: 06.12.18

Worthing Borough Council
Planning Policy
Portland House
Worthing BN11 1HS

4th December 2018

Dear Sir,

I support the policies SP5 & SP6
to protect Green Belt status to the Goring -
Ferry Gap and Chatsworth Farm as both
a local Green Gap and local Green Space

Yours faithfully

REFERENCE

Comment No: DWLP-M- 52

Date Received: 06.12.18

[REDACTED]

Jack Calvert age 9

REF POLICIES SP5 AND SP6

Dear worthing Council

I think building on goring gap is a bad ~~for~~ idea because we get a lot off crops. ~~The~~ The idea is not a great Plan because fernhurst is right next to it and if a dog ran into the houses how would you find your dog so my point I am making is I think you should not build on goring gap. There for we should keep our freindly enviroment how it is.

Sincerely [REDACTED]

REFERENCE

Comment No: DWLP-M- 53

Date Received: 06.12.18

Wednesday 5th December 2018

Amie Calwert (Age 13)

Dear Worthing Borough Council,

I am writing in reference of policies SP5 and SP6. I believe that this consideration is utterly ignorant towards the neighbours of Goring-Ferring Gap and Chatsmore Farm.

If you build on this land it will ruin the aesthetically pleasing look of our town. Also it will create a greater strain on schools and NHS funding this can lead to more job strikes and it will jeopardise childrens education as well as peoples health. By building more housing traffic will increase which could eventually lead to a longer journey time then leading to lateness as people wouldn't be able to get to their destination on time.

I also believe that this green area should be used to have a fun, enjoyable, relaxing time and for locals to enjoy the views instead of building unnecessary, unathestically pleasing housing.

Yours Faithfully

Dear Worthing borough council,

Ref policies Sp5 and Sp6

I think that "goring gap" should not be built over it is such a lovely environment and is used as much more than just a farmers field for example family walks, dog walks and big adventures. I think if you were to build an estate on the field it would ruin our friendly environment and it is a known fact that in estates crime rate goes up. If you were to build any sort of housing/estate it may put pressure on local schools and less children will get into their chosen school.

Doctor surgeries are already under huge pressure due to increasing population. I believe that goring and ferring are beautiful places and building over our landscape will just ruin it. People come to Worthing for views like that!

Yours Sincerely

age 11

REFERENCE

Comment No: DWLP-M- 54

Date Received: 06.12.18

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	Molly Janes
------	-------------

General comments

I would like to see Goring Gap defended for the following reasons.

1. It is used and enjoyed a great deal in the summer months by people of a mixed age range which is hugely positive for the quality of life for residents and visitors to the area. Increasing the lure for people to spend time outdoors and socialising in a natural environment. This has been scientifically proven to improve health and aid in building a community.
2. The ground occasionally floods, after heavy rainfall and stormy seas, debris and rainwater often build up on the grass at Goring Gap. When this is considered, it is clear that to add more homes to the location would increase surface water run off into the roads and drains causing more wear and tear on infrastructure. I do not agree that this is a wise choice to make and that instead the land ought to be protected from development.
3. The need for homes is not due to the lack of homes available but rather down to the way housing is managed and distributed. We have empty properties waiting for inhabitants which are owned by councils and the military. These homes should be filled as a matter of urgency. Disused buildings must be restored and re purposed before beautiful green spaces are even considered for sites to build upon.

I trust my local government to listen to and act accordingly to to the wishes of its constituency.



REFERENCE

DWLP-M -56

**Date received:
07/12/2018**

Arun District Council
Civic Centre
Maltravers Road
Littlehampton
West Sussex. BN17 5LF

Tel: (01903) 737500

web: www.arun.gov.uk

email: localplan@arun.gov.uk

7th December 2018

Please ask for: Kevin Owen
Planning Policy Team
Directorate of Place
Direct Line: (01903) 737853

Attention:

Dear Ian Moody,

Worthing Local Plan – Regulation 18 Public Consultation

Thank you for the opportunity to comment on the above Worthing Local Plan consultation. Please find attached Arun District Council's conditional response which was considered and agreed at the Planning Policy Sub-Committee meeting on Wednesday 5th of December 2018.

You will find that the report attached, concludes that Arun has no choice but to make a formal objection to Worthing's emerging Local Plan and identifies actions that both authorities need to progress urgently, in order to try to resolve this objection going forward under the 'Duty to Cooperate'.

I would be grateful if you could acknowledge receipt of this letter and the attached Local Plan Sub-Committee report setting out Arun's response.

I will be happy to discuss the response and will shortly send a letter suggesting dates for potential opportunities for meetings to address the matters raised in Arun's response under the 'Duty to Cooperate'. Please don't hesitate to contact me by writing to or emailing Planning Policy & Conservation team at localplan@arun.gov.uk (or telephone:01903 737853).

Yours sincerely,

A handwritten signature in black ink, appearing to read "K Owen".

Kevin Owen (Planning Policy Team Leader)

Arun District Council

ARUN DISTRICT COUNCIL

REPORT TO AND DECISION OF PLANNING POLICY SUB-COMMITTEE ON 5TH DECEMBER 2018

PART A : REPORT

SUBJECT: Response to Draft Local Plan for Worthing Borough

REPORT AUTHOR: Kevin Owen, Planning Policy Team Leader

DATE: 12 November 2018

EXTN: X 37853

PORTFOLIO AREA: Planning

EXECUTIVE SUMMARY:

This report advises members on Worthing District Councils Local Plan consultation. The Draft Worthing Local Plan covers the period 2016 to 2033 and has been put to public consultation for six week 31st October to 12th December 2018. The proposed plan sets out a strategy, site allocations and policies to deliver Worthing's housing and development needs over this period. Arun will need to make a response because of the cross boundary implications of this plan which does not propose to meet all of its overall Objectively Assessed Housing Need (OAN) which is significant because Worthing is within a shared housing market area (HMA) with Arun and Adur, Brighton & Hove, Chichester, Lewes, Worthing and the South Downs National Park Authority.

RECOMMENDATIONS:

1. That the Conclusions set out in paragraphs 1.14 to 1.16 (inclusive) to this report be agreed as Arun District councils' formal response to the Worthing draft Local Plan Regulation 18 Consultation.
2. Arun District Council considers that it has no choice but to object to the draft Local Plan as proposed, because it leaves a significant unmet need unresolved.

1. BACKGROUND:

- 1.1 Worthing has been progressing the preparation of a new development plan called the 'Worthing Local Plan' which covers the plan period 2016 to 2033. An Issues and Options consultation took place in 2016 and this current stage is known as the Regulation 18 draft plan consultation stage which responds to comments previously submitted on issues and options. Arun submitted a response to this issues and options consultation as follows:-

"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.”

- 1.2 The Local Plan (Plan) will replace the Worthing Core Strategy (2011 - 2026) and will cover Worthing District but exclude those areas within the South Down's National Park (SDNP) planning authority area. The plan states that it aims to meet Worthing's OAN and infrastructure requirements, identify land where development would be appropriate and provide a strategy and core policies for securing growth and regeneration through securing local facilities and infrastructure while protecting and enhancing the natural and built historic environment.
- 1.3 The Plan consultation is accompanied by numerous evidence studies including Worthing Housing Study June 2015 and a Housing Implementation Strategy. The latter document concluded that Worthing's OAN based on the standard housing methodology introduced by the revised National Planning Policy Framework (NPPF18) and the 2016 based household projections (published September 2016) equates to 12,801 dwellings or 753 dwellings per annum (dpa) over the plan period to 2033.

REPORT

- 1.4 The draft Plan sets out a vision and 20 supporting strategic objectives. The vision talks about Worthing continuing to provide an attractive location for people visit, live and work in and to attract high calibre business but also recognises that because Worthing has very little land (92% of the Borough is developed - excluding the part that lies within SDNP) the Plan must develop land in the most efficient way to maximise the widest range of identified needs whilst at the same time ensuring that the Borough's quality environment is protected and enhanced.
- 1.5 The Plan's Strategy for the future development of Worthing consequently focuses on achieving as much of Worthing's needs as possible through regeneration and transforming 6 'Areas of Change' and developing 8 brownfield and 3 omission sites within the Built up Area Boundary (BUAB). Smaller sites will also be expected to make a contribution.
- 1.6 Outside the Worthing BUAB, because of the potential danger of coalescence with Ferring in the west to Lancing in the east, there are only considered to be a limited number of sites that could be positively looked at. Consequently, following

Sustainability Appraisal, three sites will provide potential development without damaging the character and environment of the Borough (i.e. without threatening development on open spaces in important protected Local Green Gaps e.g. Goring-Ferring Gap and Chatsworth Farm).

- 1.7 To recognise the constrained context for growth the housing target has therefore, been tested against land supply (as established by the 2017 published SHLAA and 'brownfield register' and following a 'call for sites' exercise). The Housing Implementation Strategy concludes that there is only capacity to provide 4,182 dwellings (i.e. a minimum of 242 dpa) over the plan period. This would leave a significant shortfall of 8,600 dwellings or 77% of the OAN over the Plan period.
- 1.8 In line with the NPPF (2018) the Plan emphasises the need for maximising the use of land through setting minimum densities through a design led approach, related to transport accessibility, anticipating 35 dwelling per hectare for family housing up to 50 dwellings per ha within the town centre (e.g. through flatted development).
- 1.9 With regard to employment needs, the Plan proposes B class floor space allocations (circa 11 ha) to reflect the capacity constrained housing target. The Employment Land Review 2016 considers that most of the employment land is well used and occupied and of good or reasonable standard and should be retained. There are some poorer elements of supply (e.g. poor access/amenity) but these are well occupied with reasonable prospect for continuing employment use. Worthing has sustained some B1 and B2 stock losses and coupled with the need to stimulate new sectors and growth but with little opportunity for new land allocations, the approach is to protect employment land and keep the matter under review.

Key Issues

- 1.10 It is in Arun's interests to see that "neighbouring" local authorities (including those that are within the Housing Market area but not immediately adjacent to Arun) do all they can to accommodate their own growth needs sustainably – under the 'Duty to Cooperate' authorities must identify cross boundary matters and try to resolve these matters through cooperation leading to Statements of Common Ground or Memoranda of Understanding. The NPPF places more emphasis on resolving such cross boundary matters early in plan making to ensure that needs are met and plans are sound and deliverable.
- 1.11 Arun has an adopted Local Plan and has already made provision under the 'Duty to Cooperate' to accommodate some of the need arising in Worthing (and Chichester) which when combined amounts to some 1,600 dwellings. Any additional shortfall arising from Worthing from their new plan would be a matter for the next Arun Local Plan review in a few years' time. Worthing have not asked Arun to address any further unmet need arising from their Plan preparation under the 'Duty to Cooperate' at this stage.
- 1.12 Worthing cite the 'Duty to Cooperate' engagement process already committed to by the West Sussex Coastal and Greater Brighton authorities in progressing the Local Strategic Statement (LSS) 2 to LLS3 as the appropriate framework for agreeing how unmet needs across the coastal authorities should be resolved. However, this

process has been delayed pending resource and governance arrangements being adequately put in place in order to secure real outcomes on the future distribution of any unmet needs. Authorities within the sub region therefore, face significant political challenges unless the LSS3 matters are progressed swiftly. Consequently, there is a big risk to plan making within the sub-region with emerging plans potentially being found unsound or failing under the 'Duty to Cooperate'.

- 1.13 While the Worthing Local Plan will significantly undershoot its OAN, it is apparent that the economic strategy is commensurate with this and so will not pose significant imbalances that lead to increased commuting pressures across neighbouring authorities (although it should be noted that Arun is assisting with Worthing's employment land shortfall and this strategy will influence some commuting). Nevertheless, the regeneration emphasis coupled with husbanding of employment land in Worthing should help to reduce further pressure for out commuting. However, as it stands, there is likely to be significant housing pressure and an impact on local services in neighbouring authorities because people will be forced to seek to live close to but outside of Worthing's District.

Conclusions

- 1.14 It is recognised and acknowledged, that the current proposed strategy within the emerging Worthing Local Plan has been based on a considerable amount of evidence work and effort in trying to identify land to meet Worthing's OAN and other needs. However, despite these efforts a significant shortfall in the OAN remains. Arun considers that the expectation and reliance placed on the LSS3 process has proved to be too optimistic (which is also the case for all of the other relevant authorities – including Arun) and in particular, Arun considers that there are still some actions within the remit of Worthing that have been left unresolved which may bring other sources of supply and more deliverable solutions.
- 1.15 For this reason, Arun considers that it has no choice but to object to the draft Local Plan as proposed because it leaves a significant unmet need unresolved which will be prejudicial to Arun's own Local Plan preparation over the next few years. Indeed, this may similarly be the case for other neighbouring authorities embarking on plan making within the Housing Market Area (HMA). Nevertheless, Arun considers that through the Duty to Cooperate and proposed actions set out below, that both authorities (including with other neighbouring authorities within the HMA) can work together to remove Arun's objection in progressing Worthing's Local Plan. The key actions that need to be addressed are as follows :-
- Worthing District review its plan making timetable in order to engage on a process that would seek to align plan making timetables with other neighbouring plan reviews within the HMA including where feasible, to an agreed a revised strategic timetable for the LSS3 process, should concrete actions be taken to accelerate deliverable outcomes;
 - Before progressing Worthing's plan timetable further, undertake specific bi-lateral Duty to Cooperate meetings with Worthing's neighbouring authorities in order to fully understand the potential cross boundary matters and necessary mitigations that would be needed to resolve impacts - to be secured through updated Statements of Common Ground or Memoranda of Understanding in accordance

<p>with the NPPF as early as possible in plan making;</p> <ul style="list-style-type: none"> • Undertake further detailed evidence on urban capacity within the District with regard to 'Design led' solutions to securing housing delivery through mixed use development, maximising the efficiency of land use and setting minimum densities at appropriate public transport accessible locations (including scope for high rise flatted development where appropriate as well as using car parking land more efficiently), in order to update its housing capacity assessment; • In particular, review Worthing's lower order employment sites to determine whether there is scope for employment regeneration through potential mixed use schemes that improve viability both to improve the employment stock while also securing a contribution towards other needs such as housing over the plan period; • In any event, build in trigger and early review mechanisms into Worthing's draft Local Plan to ensure that Worthing's development strategy can be adjusted to reflect needs and opportunities identified through its ongoing evidence preparation, including joint evidence preparation and studies where necessary, and to coordinate with plan making in neighbouring areas. 														
<p>1.16 Should Worthing not be able to accommodate these actions, then Arun will not be able to resolve its objection to the proposed Plan strategy because of the significant impacts that would arise on the communities and environment of Arun (and indeed other neighbouring authorities). In particular, should Worthing adopt a plan based on this strategy, the prejudicial uncertainty that would be posed to Arun's own future plan review and risk to soundness would be unacceptable given the absence of strategic unmet needs having been satisfactorily resolved via the Duty to Cooperate and insufficient progress on LSS3.</p>														
<p>2. PROPOSAL(S):</p> <p>That the report be noted and the recommendation agreed as the Councils formal response to the Worthing Draft Local Plan Regulation 18 public consultation.</p>														
<p>3. OPTIONS: To object to Worthing's draft Local Plan</p>														
<p>4. CONSULTATION:</p> <table border="1"> <thead> <tr> <th>Has consultation been undertaken with:</th> <th>YES</th> <th>NO</th> </tr> </thead> <tbody> <tr> <td>Relevant Town/Parish Council</td> <td></td> <td>x</td> </tr> <tr> <td>Relevant District Ward Councillors</td> <td></td> <td>x</td> </tr> <tr> <td>Other groups/persons (please specify)</td> <td></td> <td></td> </tr> </tbody> </table>			Has consultation been undertaken with:	YES	NO	Relevant Town/Parish Council		x	Relevant District Ward Councillors		x	Other groups/persons (please specify)		
Has consultation been undertaken with:	YES	NO												
Relevant Town/Parish Council		x												
Relevant District Ward Councillors		x												
Other groups/persons (please specify)														
<p>5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)</p> <table border="1"> <thead> <tr> <th></th> <th>YES</th> <th>NO</th> </tr> </thead> <tbody> <tr> <td>Financial</td> <td></td> <td>x</td> </tr> <tr> <td>Legal</td> <td></td> <td>x</td> </tr> </tbody> </table>				YES	NO	Financial		x	Legal		x			
	YES	NO												
Financial		x												
Legal		x												

Human Rights/Equality Impact Assessment		X
Community Safety including Section 17 of Crime & Disorder Act		X
Sustainability		X
Asset Management/Property/Land		X
Technology		X
Other (please explain)		X

6. IMPLICATIONS:

The potential impact on Arun's environment, infrastructure and communities arising from unmet needs from a neighbouring local authority and implications for the soundness of plan making including risks under the 'Duty to Cooperate' as well as coordination of plan making timetables.

7. REASON FOR THE DECISION:

To ensure that Arun can continue to ensure that development is plan led and consistent with sustainable development in addressing its own needs as well as ensuring that "neighbouring areas" meet their own needs including any unmet needs through an agreed strategic approach across the West Sussex Coastal and Greater Brighton area.

8. EFFECTIVE DATE OF THE DECISION:

9. BACKGROUND PAPERS:

All relevant documents, including the evidence base, summary leaflets and response form can be viewed on the Council's website from 31st October at:

www.adurworthing.gov.uk/worthing-local-plan/.

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	Angela Barker
------	---------------

General comments

As a member of Goring Residents' Association I support the recommendations made by Worthing Council to designate and provide protection to the **Goring Gap South and Goring Gap North** as a Local Green Space and a continue Strategic Gap between Goring and Ferring.

I would also support the recommendation to keep **Brooklands** as a local green gap.

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	Margaret Horton
-------------	-----------------

General comments

Goring Gap South and Goring Gap North (known as Chatsmore Farm) (SP5 & SP6-LP pages 25-37)

I agree with the Council to designate and provide protection to the Goring Gap South and Goring Gap North as a Local Green Space and a continued Strategic Gap between Goring and Ferring

I also agree to support the Council on keeping Brooklands (SP5 & 6-LP pages 25-37) as a local green gap.

Contact:

Planning Policy, Telephone: 01444 – 477053
E-mail: planningpolicy@midsussex.gov.uk

Your Ref:

Date: 10th December
2018

Our Ref: Worthing Reg 18 Local Plan

worthinglocalplan@adur-worthing.gov.uk

By e-mail only

REFERENCE

DWLP-M -59

Date received:
10/12/2018

Dear Sir/Madam,

Worthing Draft Local Plan: 2033 - Regulation 18 Consultation

Mid Sussex District Council welcomes the opportunity to comment on the Regulation 18 consultation on the Worthing Draft Local Plan 2033 ('the Plan').

Housing Need

The Worthing Housing Study 2015 identified that the Borough has an Objectively Assessed Housing Need of 12,801 units to 2033, or 753 dwellings per annum. However, the Plan only makes provision for 4,182 dwellings over the Plan period, or 246 dwellings per annum. The Plan provision therefore represents approximately one third of the Council's objectively assessed housing need.

MSDC recognises the challenge that Worthing Borough Council (WBC) has in meeting its Objectively Assessed Housing Need, due to the constrained nature of the Borough, with the South Downs National Park to the north, and the sea to the south, as well as the fact that 24% of the Borough lies in the South Downs National Park. MSDC supports WBC's need to balance the efficient use of land while '*protecting the Borough's environment, intrinsic character and its coastal and countryside setting*', as set out in the Plan's Vision.

However, despite the constraints set out above, it is noted that, over the last three years, WBC has delivered 351 homes in 2014/2015, 484 units in 2015/2016, and 347 units in 2016/2017. This demonstrates that the Borough can consistently deliver more than the 246 dwellings per annum identified in the Local Plan.

While it is recognised that brownfield land is a finite resource, changes in other land uses such as retail closures, employment restructuring or changes in technology do provide a continuing source of previously developed land and therefore it is considered that WBC could be more ambitious in allocating sites which could come forward during the Plan period.

Specifically, MSDC believes that there are three key areas of the Plan where more housing delivery could be secured.

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1. Areas of Change

The Plan identifies six brownfield Areas of Change, where change is expected and encouraged over the Plan period.

Paragraph 3.6 of the Plan states that:

‘There is currently insufficient delivery certainty for these sites that would justify a specific allocation’.

MSDC strongly encourages WBC to work with the relevant developers to be sufficiently certain of delivery of these sites so that they can be identified as draft allocations in the Regulation 19, pre-submission publication of the Plan.

Allocating Areas of Change would provide a significant boost to the land supply identified in the Plan. Table 1 of the Plan identifies that currently, sites for 853 new homes are allocated for development, with a further 495 dwellings in Areas of Change. The inclusion of the six sites identified as Areas of Change would increase the number of homes that the Plan allocates by 58%, which would take the total housing supply to 4,677 dwellings.

2. Small Sites

Policy SP2 *‘seeks to increase the rate of housing delivery from small sites.’* However, it is not clear what mechanisms WBC will use to encourage small sites to come forward. MSDC encourages WBC to provide more information in the Plan about how proposals for development of small sites will be encouraged.

3. Density

Paragraph 123 of the NPPF states that:

‘Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. Plans should contain policies to optimise the use of land in their area and meet as much of the identified housing need as possible. This will be tested robustly at Examination, and should include the use of minimum density standards for city and town centres and other locations that are well serviced by public transport.’

Paragraph 123 goes on to note that:

‘These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this is inappropriate.’

The NPPF text provides a clear signal that densities should be optimised where at all possible. However, Policy SP2 – Spatial Strategy only states that, in the Built Up Area, *‘Development should make efficient use of previously developed land but the density of development should be appropriate for its proposed use and also relate well to the surrounding uses and the character of the area.’*

Policy CP2 – Density sets out a requirement that family housing should achieve a minimum density of 35 dwellings per hectare, and that flats, mixed residential development,

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INVESTOR IN PEOPLE

Planning Policy and Economic Development
Business Unit



developments in the town centre and sites near public transport provision should achieve densities in excess of 50 dph.

There does not appear to be a paper on density in the evidence base supporting the Plan. However, the Guide for Residential Development SPD (November 2013) sets out density standards for new developments in the Borough. Paragraph 4.24 notes that:

'Densities of 100 dph and above may even be permissible in appropriate locations and there are many examples of high quality development where densities in excess of this have been achieved.'

In this context, MSDC encourages WBC to review whether higher densities could be achieved across the Borough, particularly in sustainable locations with good or excellent accessibility to public transport provision, and on large sites which will create their own character.

Local Green Gaps

The Plan notes that within the Borough, there are more than 360 hectares of parks and open recreation spaces. In addition, 24% of the Borough lies within the South Downs National Park, which is highly accessible, immediately to the north.

The Plan identifies four Local Green Gaps, two on the western side of Worthing, and two on the eastern side. It is noted that these gaps are contiguous with gaps identified in Arun and in Adur districts, which are also designated in their respective Local Plan as Local Green Gaps.

MSDC notes that the Green Gaps prevent coalescence between Worthing and Ferring to the west, and Sompting/Lancing to the east, and that three of these gaps are also likely to be designated as Local Green Spaces.

MSDC therefore accepts that these Green Gaps have multiple important functions in the relatively built up Borough of Worthing.

Joint Working

MSDC is currently working with Worthing Borough Council and with the other Coastal West Sussex and Greater Brighton Authorities to prepare the Local Strategic Statement 3 (LSS 3), which will identify and manage spatial planning issues that impact across the authorities. This Plan will cover the period between post 2030 and 2050.

In the meantime, MSDC would be happy to work with WBC on a revised Memorandum of Understanding (MoU), to update the MoU which was signed by both authorities in 2016, to ensure that the MoU is robust, and reflects the current issues which are the subject of discussion.

Yours sincerely,



Cllr. Andrew MacNaughton
Cabinet Member for Housing and Planning

Working together for a better Mid Sussex

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	Anne Jackson
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General comments

In response to the Worthing local plan, as a resident of 35 years in the Goring by Sea area, I feel I must strongly advocate the continued presence of the Goring Gap (and Brooklands on the other side of town) as a public amenity. Besides being an important strategic green space, it affords wildlife (and birds in particular) an opportunity to flourish and survive in this area. Migrating birds are known to use the trees in the Plantation in Goring as a respite area.

As a public amenity used by many walkers and dog walkers alike, it should be preserved as one of the very few green spaces on the over crowded West Sussex south coast. Goring Gap should be preserved for generations to come, any development would be a blight on the landscape and not in keeping with the beauty that this area possesses.

REFERENCE

Comment No: DWLP-M- 61

Date Received: 10.12.2018

Laurence & Eleanor Millward



Policy Planning Team
Worthing Borough Council

9th December 2018

WORTHING LOCAL PLAN

GORING STRATEGIC GAP – South & North (known as Chatsmore Farm)

We most definitely welcome and fully support Worthing Borough Council's decision to designate and provide protection to the Goring-Ferring strategic Gap.

This Gap (SP5) is important in preserving Goring's character and identity by preventing settlement coalescence.

This local gap (SP5) offers people leisure activities which promote health and well-being in our community.

This local gap (SP6) is a valued place for relaxation and exercise

This local gap (SP5) and Local Green Space (SP6) is valued for its historic association, views, wildlife and bird-watching, black skies to enjoy stargazing and tranquillity which is not found in other parts of Worthing due to it being built up.

BROOKLANDS PARK (SP5 & SP6)

We would support the council in their plans for making Brooklands Park into a Local Green Gap and Local Green Space

GORING RE-BUILD

We appreciate Worthing does need to do its bit to provide more housing and until we see plans for generating more houses we are not able to comment on their suitability - BUT - we would say now, that new builds MUST NOT be to the detriment of those already living in the area. New projects must be sensitive to the existing area by not building too close to existing boundary lines, not overshadow existing properties, ensure sufficient off road parking, road junction improvements are developed. We also urge the Council to ensure that there are adequate amenities put in place such as schooling, doctors, transportation links etc., and prior to any regeneration taking place and if

funding for these amenities are coming from the developers this funding is put up front before they conveniently run out of funds at the end of the project.

WORTHING COASTLINE (CP13) & (CP13)

We hope the Council will continue to keep the natural coastline with its associated vistas and access to views are protected for the enjoyment of Worthing Residents and visitors. It benefits the wellbeing of residents and brings visitors from far and wide to enjoy our climate and vistas and helps with Worthing's local economy.

Beach Huts and Promenade (CP8) - Visitor Economy (CP13)

We know there are plans to increase the beach huts and with a possibility of extending the promenade along to Sea Lane Café. We have no objection to you increasing beach huts as long as the promenade runs in front of the beach huts, in areas where the promenade is behind beach huts then there is a massive objection. Visitors come to Worthing to shop and walk beside the sea, many walk from the pier to Marine Gardens and along to Goring to Sea Lane Café. They walk, chat and want to see the sea, not the backs of beach huts. Should you infill the beach hut gaps there would be no enjoyment walking on the sea front which would lessen the visitor economy to Marine Gardens and Sea Lane Café.

WORTHING TOWN CENTRE

Retail (CP14)

We find this a good shopping area but we are concerned that more and more outlets are being put over to food/coffee. Whilst there is a need for such establishments without sufficient commercial outlets there is nothing to draw people into the town centre. The town centre brings in local but mainly visitor economy and having too many rough sleepers and beggars in the town centre is a definite deterrent to not visit the town centre, other town centres have solved this problem and Worthing must attack this issue before it becomes more the norm.

Yours faithfully



Eleanor and Laurence Millward

REFERENCE

DWLP-M -62

Date received:
10/12/2018

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

If calling please ask for: Mike Allgrove/Tim Guymer

Our ref:

Your ref:

10 December 2018

Dear Ian,

Re: Worthing Draft Local Plan Consultation

Thank you for consulting Chichester District Council (CDC) on the Worthing Draft Local Plan, published 30 October 2018. The Council's Development Plan and Infrastructure Panel have carefully considered the Plan as presented and endorsed the officer's recommended response as summarised below.

As a partner authority in the West Sussex and Greater Brighton Strategic Planning Board, we welcome the recognition given to the ongoing work of the Board in addressing cross-boundary and sub-regional matters to ensure that the strategic development and infrastructure needs of the overall area are met as far as possible within the context of the provision of the National Planning Policy Framework (NPPF).

We note that a revised timetable for the ongoing preparation of the Local Plan has yet to be published. Nevertheless, it is evident that the Local Plan is unlikely to be adopted for at least another 12-18 months. In this context, and bearing in mind the requirement in the NPPF that local plans should cover a minimum 15 year period from the anticipated date of adoption, the current planned end date of the Plan of 2033 is unlikely to be in accordance with this requirement. The justification for this is not clear.

The draft Local Plan makes provision for a minimum of 246 dwellings per annum (dpa) for the period 2016-2033 with the figure acknowledged in the draft Local Plan as a 'capacity-based' rather than a supply that is likely to meet an identified objectively assessed housing need. Clearly this approach, if pursued through to the submission version of the Local Plan, has the potential to lead to significant unmet needs (approximately 630 dpa if measured against 2014-based projections) arising from the preferred strategy of the Plan.

Given the potential effect of this strategy, we would encourage Worthing Borough Council to further investigate all potential opportunities to increase housing provision within its plan area. This includes ensuring that no stone is left unturned by the Council in maximising the potential of the existing urban areas to regenerate and be intensified, where appropriate to do so.

In relation to the proposed employment and retail/leisure needs, we note that the draft Local Plan proposes to largely meet these identified needs, albeit that the effect of the current plan period could be regarded as serving to under-estimate the development requirements that should be planned for.

Finally, the Council supports the principle of the gaps policy, subject to further detailed evidence being forthcoming to justify their extent in the context of balancing the development needs of the plan area

We trust that this response is helpful to you in your considerations. We look forward to continue working with you and the other members of the West Sussex and Greater Brighton Strategic Planning Board in addressing the longer term cross-boundary and sub-regional matters that could arise from your Local Plan and other plans in preparation.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Mike Allgrove', with a stylized, cursive script.

Mike Allgrove
Planning Policy Manager

REFERENCE

DWLP-M -63

Date received:
10/12/2018

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

Our ref: HA/2014/115582/OT-
02/SB1-L01
Your ref:
Date: 10 December 2018

Dear Ian

Worthing Draft Local Plan 2016-2033 Regulation 2018

Thank you for consulting us on your draft Local Plan. Please find below comments on specific aspects of the Plan.

Part 3 – Sites

We have reviewed the Sequential and Exceptions Test background document and agree with the methodology used to ensure that allocations comply with requirements in the NPPF. The following provides site specific comments on those sites with environmental constraints and/or opportunities. For those sites with flood risk the comments below are based on your assessment that the Sequential Test has been passed.

Decoy Farm, East Worthing (A4)

We have reviewed the development requirements set out for this site. We support the requirements but would wish to see the following amendments and additions translated in to a policy for the site as your Plan develops:

- Ensure that potential contaminated land is appropriately assessed and where necessary appropriate remediation takes place;
- Adopt the sequential approach so that the most vulnerable uses are located in the areas at lowest risk of flooding and no built development is located in Flood Zone 3;
- An adequate buffer between the watercourse and any potential development would be required to ensure protection of the Teville Stream; and
- Opportunities for the enhancement and restoration of the Teville Stream will be sought, with the removal of culverts actively encouraged. Any crossings of the Teville Stream should be clear span in nature.
- A scheme to eradicate the invasive plant species present would be needed to support any development on the site.

In addition to the above consideration should be given to the surface water drainage

Environment Agency
Portfield Depot Oving Road, Chichester, West Sussex, PO20 2AG.
Customer services line: 03708 506 506
www.gov.uk/environment-agency
Cont/d..

scheme due to the likely contamination of the site and any remediation options. Surface water must not be discharged through contaminated soils and as a result there may be a land take implication for surface water drainage that should be considered. This requirement could be met through a specific policy requirement for this site allocation or you may consider that it will be met through policy CP2.

Teville Gate (A5)

We are pleased to see specific reference to contaminated land in the development criteria. As above we would wish to see policy criteria make specific reference to potential contaminated land being appropriately assessed and where necessary appropriate remediation taking place.

Grafton Site, Marine Parade (A7)

Given the flood risk constraints on this site we would wish to see any policy allocation have clear criteria as to the detailed requirements that would need to be met prior to the site being developed. Whilst the development requirements you have included are relevant these could be strengthened to specify key aspects of a site specific Flood Risk Assessment that would be required for this site.

British Gas Site, Lyndhurst Road (AOC2)

As we have previously said we support the redevelopment of the site and are pleased to see the issues of contamination are well represented.

Consideration should 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 and as a result there may be a land take implication for surface water drainage that should be considered.

We also support the need for the comprehensive redevelopment of the whole site.

Stagecoach Bus Depot, Library Place (AOC3)

Given the flood risk constraints on this site we would wish to see any policy allocation have clear criteria as to the detailed requirements that would need to be met prior to the site being developed. Whilst the development requirements you have included are relevant these could be strengthened to specify key aspects of a site specific Flood Risk Assessment that would be required for this site.

We are pleased to see specific reference to contaminated land in the development criteria. As above we would wish to see policy criteria make specific reference to potential contaminated land being appropriately assessed and where necessary appropriate remediation taking place.

Part 4 – Core Policies

CP4 – Gypsy and Traveller and Travelling Showpeople

We are pleased to see specific criteria included in this policy to ensure no development of this type is undertaken in flood zone 3 and that appropriate consideration is given to foul drainage and connection to mains sewer.

CP17 – Sustainable Design

We support the specific requirements of this policy to ensure development meets high standards for water efficiency. We are also pleased to see the requirement for a Sustainability Statement for major development to encourage the implementation of

the policy.

CP19 – Biodiversity

As drafted this is a comprehensive policy which addresses the need for developments to consider their impact on biodiversity.

Whilst we support the mitigation hierarchy identified in the policy we would wish the policy to be enhanced/changed in emphasis to ensure that the primary intention is that harm would be avoided.

Bullet (f) sets out that major development should “where possible” achieve environmental net gain. We support this intention but again recommend it could be strengthened in line with paragraph 174 of the NPPF which sets out that plans should identify and pursue opportunities for securing measurable net gains for biodiversity. This is also in line with the government’s intention to mandate biodiversity net gain in new development to ensure habitats are protected and enhanced for the future as set out in their consultation document which was published on 2nd December 2018.

CP20 – Green Infrastructure

We support the inclusion of this policy and your commitment to the creation and enhancement of a green infrastructure network within the Borough.

CP21 – Flood Risk and Sustainable Drainage

We support this policy. We would recommend that the policy makes some reference to the need for sites to meet the sequential test and ensure that development be directed away from the areas at the highest risk of flooding.

We note the discussion set out in your Sequential and Exceptions Test background document regarding Windfall Sites and the conclusion that the sequential test is deemed passed for all windfall sites, however, we still consider that the policy should make reference for this stage to be applied regardless of the conclusion that is made. For clarity the supporting text could then be amended to reference the Sequential and Exceptions Test document.

We are pleased to see reference within your plan that opportunities for natural flood management would be taken forward. We would be happy to work with you to identify the types of natural flood management that would be appropriate within your Borough and any priority areas.

CP22 – Water Quality and Protection

We support the inclusion of this policy and are particularly pleased to see direct reference to the Water Framework Directive in the policy.

Bullet (c) refers to the need for a preliminary risk assessment where there is a potential risk of contamination of controlled waters. It should be noted that in some instances further assessments would be required. Perhaps the wording could be worded to state “as a minimum, a preliminary risk assessment will be required...”

CP23 – Pollution and Contamination

We support the inclusion of this policy.

I trust that the above comments are helpful to you. If you would like to discuss anything further as you prepare your proposed submission Plan please do not hesitate to contact me.

Yours sincerely,

Hannah Hyland
Planning Specialist

Direct dial 0203 0257088

Direct e-mail hannah.hyland@environment-agency.gov.uk

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	P & M Green
------	-------------

General comments

I am responding on behalf of myself, Mr Peter John Green and my wife Mrs Marilyn Ann Green to the Draft Worthing Local Plan and whole heartedly support and agree the decision made to designate and provide protection to the Goring Gap South and Goring Gap North as both a Local Green Gap (SP5) and Local Green Space (SP6). LP pages 25-37.

We also agree with your decision to keep Brooklands (SP5 & 6-LP pages 25-37) as a Local Green Gap. Thank you.

REFERENCE

Comment No: DWLP-M- 65

Date Received: 10.12.18

Mr. & Mrs. K. Hall

[REDACTED]

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

We would like to support the Council, by keeping the Goring-Ferring Gap and Chatsmore Farm as Local green Gap (SP5) and Local Green Space (SP6) areas, for all people to enjoy as natural open space where they can see wildlife, with stunning views towards the sea and South Downs.

[REDACTED]

Kevin Hall

REFERENCE

DWLP-M -66

Date received:
10/12/2018



10 December 2018

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

Dear Sir/Madam

SDNPA representation to Worthing Draft Local Plan 2016-2033 Regulation 18 Consultation

Thank you for consulting the South Downs National Park Authority (SDNPA) on the Worthing Draft Local Plan.

The SDNPA and all relevant authorities are required to have regard to the purposes of the South Downs National Park (SDNP) as set out in Section 62 of the Environment Act 1995. The purposes are 'to conserve and enhance the natural beauty, wildlife and cultural heritage of the area' and 'to promote opportunities for the understanding and enjoyment of the special qualities of the national park by the public.'

Duty to Cooperate

The SDNPA has a set of six strategic cross-boundary priorities. I would like to take the opportunity to again highlight these which provide a framework for ongoing Duty to Cooperate discussions:

- Conserving and enhancing the natural beauty of the area.
- Conserving and enhancing the region's biodiversity (including green infrastructure issues).
- The delivery of new homes, including affordable homes and pitches for Gypsies, Travellers and Travelling Showpeople.
- The promotion of sustainable tourism.
- Development of the local economy.
- Improving the efficiency of transport networks by enhancing the proportion of travel by sustainable modes and promoting policies which reduce the need to travel.

SP4: Countryside and Undeveloped Coast

Support in particular part f) of this policy on the setting of the SDNP, respecting the Designated International Dark Skies reserve and improving access to the National Park. SDNPA reiterates its commitment to the Council in working in partnership on these issues to ensure residents benefit from the special qualities of the National Park.

SP5: Local Green Gaps and SP6: Local Green Space

The SDNP is bounded by the A259 opposite to the land at Chatsmore Farm. Significant features in this area are Highdown Gardens and Bronze Age and Iron Age earthworks on Highdown Hill within the National Park. The land at Chatsmore Farm provides a break in the settlements on the coastal plain and is significant in terms of views from the above mentioned features in the SDNP. The sensitivity of views of the coastal plain is a feature of the landscape in this area of the SDNP. This is evidenced by the South Downs Landscape Character Assessment (SDILCA) Appendix B, Landscape Type B: Wooded Estate Downland and B4: Angmering and Clapham Wooded Estate Downland.

<http://www.southdowns.gov.uk/wp-content/uploads/2015/03/ILCA-Appendix-B-Wooded-Estate-Downland.pdf>

The land at Chatsmore Farm is of significant importance in maintaining the views from the SDNP of the coastal plain with the separation of settlements. The proposed designation as a Local Green Gap in Policy SP5 and Local Green Space in Policy SP6 and justification in the supporting text is strongly supported.

CP24: Transport

Support in particular part b) iii) for the development of improved access across the A27 and better connectivity with the South Downs National Park from the borough in partnership with West Sussex County Council and relevant agencies including the SDNPA.

Site Allocations

A1: Caravan Club

The SDNPA position regarding this site remains the same as the response of 21/6/2016 to the previous consultation. Those comments are reproduced here. “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 South Downs National Park (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.”

A3: Land at Upper Brighton Road

This site is visually sensitive in views from the SDNP in particular from Lambleys Lane and the adjoining footpath on the opposite side of the A27. It is strongly suggested that the landscape character needs to inform the policy for this proposed allocation and therefore the design of any development.

The wording in the Site Constraints that the site is in close proximity to the SDNP is unhelpful in understanding this constraint. It is strongly recommended that the constraints and opportunities of this site in relation in the National Park are fully expressed and understood to ensure these sensitivities are successfully and appropriately addressed in any future scheme. The following wording is suggested. “The site contributes to the landscape and/or visual setting of the National Park at this location by virtue of its characteristic land use and contribution to the open ‘gap’ between Sompting and Worthing – a pattern of settlements and floodplains along the coast that add significantly to both the National Park’s landscape character and visual experience afforded by looking south from the chalk dip slope.” The evidence for this approach is in the South Downs Integrated Landscape Character Assessment (SDILCA) in particular Appendix A, Landscape Type A: Open Downland, A3: Arun to Adur Open Downs. <http://www.southdowns.gov.uk/wp-content/uploads/2015/03/ILCA-Appendix-A-Open-Downland.pdf>

To improve the visual impact of any development the policy should include mitigation that will strengthen the landscape character of the site including reinforcing hedgerow boundaries using planting reflecting existing species. The policy should refer to following existing boundaries and avoid the use of arbitrary boundaries reinforced by planting. In the Development Requirements, it is suggested that trees reflecting the landscape character of the site are integrated into any future development to mitigate visual impact from the SDNP. This is considered more effective than the proposed block of woodland in Parcel B that is inconsistent with the local landscape character.

Omission Sites

OS1: Land East of Titnore Lane

The boundary of the SDNP runs along the north of the site and to the west on the opposite side of Titnore Lane. The landscape immediately surrounding the site is designated as the Titnore and Goring Woods Complex Local Wildlife Site. Development here will have a significant impact on the landscape character of woodland including areas of ancient woodland in the surrounding SDNP. The landscape of the SDNP adjacent to the site is characterized by the SDILCA as Appendix B, Landscape Type B: Wooded Estate Downland and more particularly B4: Angmering and Clapham Wooded Estate Downland. <http://www.southdowns.gov.uk/wp-content/uploads/2015/03/ILCA-Appendix-B-Wooded-Estate-Downland.pdf>

The specific Landscape and Development considerations refer to conserving the covering woodland particularly areas of ancient woodland.

It is strongly recommended this site remains omitted from the Local Plan. Amendment of the Policies Map is supported with the eastern boundary of the site forming the new Built Up Area Boundary. The site being removed from the West Durrington Strategic Development Area.

OS2: Land North of Beeches Avenue and OS3: Worthing United FC

We support the Council’s position that both sites remain constrained unless the football club can be successfully relocated within Worthing. If the football club were successfully relocated any development would need to consider the following. Both sites are in a visually sensitive location in close proximity to the SDNP. Development would need to be of a high quality seeking to conserve and enhance the setting of the SDNP. Any design needs to respect the boundary location with the SDNP. It is suggested the design would need to be led by

landscape character using the South Downs Integrated Landscape Character Assessment, specifically Appendix A, Landscape Type A: Open Downland and A3: Arun to Adur Open Downs. <http://www.southdowns.gov.uk/wp-content/uploads/2015/03/ILCA-Appendix-A-Open-Downland.pdf>

Yours



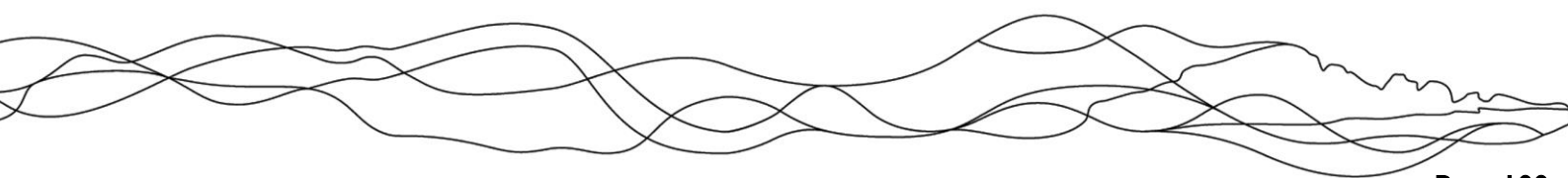
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South Downs Centre, North Street,
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Chief Executive: Trevor Beattie



REFERENCE

DWLP-M -67

Date received:
10/12/2018



Historic England

Worthing Borough Council
Planning Policy
Portland House, 44 Richmond Road
Worthing, West Sussex BN11 1HS

By email only to worthinglocalplan@adur-worthing.gov.uk

Our ref: PL00021751

Your ref:

Telephone 01483 252020

Fax 01483 252001

Email e-seast@historicengland.org.uk

Date 10 December 2018

Dear Sir or Madam

Worthing Draft Local Plan Regulation 18 Consultation

Thank you for your email of 31 October 2018 inviting comments on the above document.

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 and levels of the local planning process, and welcomes the opportunity to comment upon this key planning document.

Historic England's comments are set out detail below:

1. Introduction

We note that the **Vision** for Worthing does not include any reference to the borough's historic environment, although the **Strategic Objective SO18** does relate to the protection, enhancement of aspects of the area's character and heritage. We question whether this a strong enough commitment in itself to sustaining the future of the borough's heritage in view of the level of change promoted by the draft local plan, and if it provides the "positive strategy for the historic environment" required by paragraph 185 of the National Planning Policy Framework. It would help towards achieving this if the Vision included specific and explicit reference to the historic environment; e.g. by amendment of **V3** to:

*"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 **historic** environment, intrinsic character, **heritage assets**, and its coastal and countryside setting have been protected and enhanced."*

This is significant in respect of the **Overarching Development Principles** referred to in **paragraph 3.9** which relates the assessment of development proposals back to the Vision and Strategic Objectives.

2. Spatial Strategy

See the comments below in relation to Policy CP15 regarding inclusion a strategic policy for the historic environment in Part 2 of the Local Plan.

3. Key Sites in Worthing Borough

A3: Land at Upper Brighton Road - as mentioned in the 'constraints' section the site adjoins a conservation area and the grade II listed Upton Farm House; the 'Development Requirements' should, therefore, include a requirement to protect the setting of both the listed building and the conservation area.

A6: Union Place – there are a number of listed buildings directly facing this site on Union Place and High Street; the wording in the 'Description' and 'Site Requirements' should be revised to more clearly identify these and to require that development explicitly seeks to preserve and enhance their significances, including their settings.

A8: Civic Centre Car Park – the 'Site Description' and 'Constraints' fails to mention that the Town Hall and Assembly Room and adjacent Museum are listed buildings; the status and settings of these heritage assets will be key considerations in the assessment of any development proposals that come forward for this site and this should be reflected in the wording of the policy.

AOC3: Stagecoach Bus Station and Library Place – while the adjacent heritage assets are recognised in the 'Site Description' we would suggest that the 'Requirements' in respect of these should go further than development being "*sensitive to the surrounding conservation areas and listed buildings*" and, given their close proximity (and possible physical attachment) should require the proactive conservation and enhancement of their significance and setting.

4. Core Policies

We note the references in **Policy CP2 Density** to historic character.

We are disappointed that there are no requirements relating specifically to the conservation, enhancement and promotion of enjoyment of heritage assets in **Policy CP5 Quality of the Built Environment** despite some positive references in the supporting text. The policy can be improved and made more compliant with the NPPF by specific reference to the need to preserve and enhance the significance of heritage assets and their setting (ref. paragraph 185); by promoting the beneficial use and enjoyment of heritage assets; and, by drawing on conservation area character appraisals and other historic character tools (e.g. characterisation studies) to determine the appropriateness in design terms of new development.

We welcome the inclusion of policies **CP15 A Strategic Approach to the Historic Environment** and **CP16 The Historic Environment** and broadly support their wording. However, we find it slightly confusing that these two policies, one strategic and one (ostensibly) intended for more detailed development management purposes, are located together and have similar titles. We wonder if it would strengthen the purpose of the Local Plan if the first policy, perhaps in a refined form, was included in **Part 2 Spatial Strategy** of the Local Plan with other strategic policies, and is more closely related to the Vision and Strategic Objectives.

Policy **CP16** would have more clarity, we suggest, if the title was amended to **Development Affecting the Historic Environment**.



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 would strongly advise that the Council's own conservation staff are closely involved throughout the preparation of the Local Plan, as they are often best placed to advise on local historic environment issues and priorities, sources of data and, consideration of the options relating to the historic environment, in particular the requirement to set out a positive strategy for the conservation and enjoyment of the historic environment (NPPF para 185).

These comments are based on the information provided by you at this time and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the plan and which may, in our view, have adverse effects on the historic environment.

Yours sincerely



Alan Byrne
Historic Environment Planning Adviser



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.



REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	Gillian Hall
------	--------------

General comments

I am pleased that the Plan intends to keep Goring Gap north and Goring gap south as undeveloped areas

I object to increasing the number of beach huts between George V Ave and Sea Lane. This would restrict the view of the sea

The plans for a proposed new leisure complex must be scrutinised before approval
There must be provision of adequate parking space.
There must be improvement to nearby road junctions.

I support the plan to make Brooklands Park local green space and green park.



ADUR DISTRICT COUNCIL

Planning and Development

Mr I Moody
Worthing Planning Policy Manager
Adur and Worthing Councils
Portland House
Richmond Road
Worthing
BN11 1HS

REFERENCE

DWLP-M -69

Date received:
10/12/2018

Our Ref: BB/MR/lja
Your Ref:

10th December 2018

Dear Ian,

Representation from Adur District Council on the Draft Worthing Local Plan October 2018

Thank you for consulting Adur District Council (ADC). ADC welcomes the progress made on the Worthing Local Plan (WLP).

Worthing Borough shares many of the constraints experienced by Adur – its location between the SDNP and the English Channel means that development opportunities are severely constrained, which the WLP clearly reflects.

Adur and Worthing Councils have of course been working together for a number of years to deliver joint services, although the District and Borough retain separate Local Plans.

Adur DC and Worthing BC both signed a Memorandum of Understanding (MOU) in 2016, which establishes the basis for co-ordination and planning for the cross-boundary strategic planning issues that exist and/or are likely to arise in the foreseeable future.

This joint approach has been reflected in the joint endeavours to address the housing shortfalls experienced by both local authorities, as evidenced by the several joint MOUs and SCGs in the Worthing Duty to Co-operate Statement.

Furthermore, Worthing, as with Adur, have been engaging with other local authorities in the HMA and further afield via the West Sussex and Greater Brighton Strategic Planning Board to explore how the sub-region's development needs can be met in the longer term.



The following proposals within the Worthing Local Plan (WLP) are of specific interest to Adur:

Spatial Strategy

ADC supports the Spatial Strategy (Policy SP2), which clearly identifies the various sources from which development needs will come forward; the need for appropriate densities; the need for regeneration of identified Areas of Change, plus the importance of balancing these against the need for protecting valued open spaces, gaps and landscapes. In addition the supporting text indicates a thorough assessment of available opportunities.

Local Gap:

Policy SP5 of the WLP indicates land east of the Borough to be designated as Local Gap; this includes land at Upper Brighton Road, as well as land at Brooklands Recreation Area (and associated allotments) both of which would adjoin the Worthing –Sompting Local Green Gap. This is supported.

Upper Brighton Road (Allocation A3)

This proposed allocation lies adjacent to the Worthing-Sompting Local Green Gap as allocated in the Adur Local Plan 2017; across the gap is the West Sompting housing allocation. These allocations within the Adur Local Plan were carefully assessed with regards to the need to avoid coalescence of the Worthing and Sompting settlements. It would be beneficial for the need to avoid coalescence to be specifically referred to on pages 48/49 where the details of the proposed allocation are set out.

In addition, Policy SP5 of the WLP states that land east of the proposed allocation is designated as Local Green Gap. (See comments above). However, the Local Green Gap does not appear to be referred to on pages 48/49. ADC request that should the Upper Brighton Road allocation be progressed, the allocation policy should make clear that the eastern extent of the allocations (parts A and B) will form part of the Local Green Gap, for the avoidance of doubt.

The Site Description on page 48 should refer to Sompting *Village* Conservation Area. The text would benefit from rewording to make clear that the 'small linear settlement' lies *within* the conservation area.

The development requirements section (currently on page 49) would also benefit from clarifying that not only should parcel B maintain separation due to the more rural character of the area to the east, but also to reflect the setting of the conservation area and listed building, (should detailed assessment find that this land forms part of the setting). Similarly Parcel A also needs to take into account the setting of the conservation area. Capturing these matters within the relevant allocation policy would ensure these factors are taken into account.

ADC request that, should this allocation be progressed, careful attention is paid to the avoidance of coalescence, landscape matters, transport movement, (particularly with regards to West Street) and potential impact on the Sompting Village Conservation Area.

Decoy Farm East Worthing (A4)

ADC note this site is allocated for commercial use. Again we would request that careful regard is given to the potential impact of development on the Worthing-Sompting Local Green Gap which lies adjacent to this potential allocation, particularly given the height of some parts of the site. You will also be aware that Policy 6 of the adopted Adur Local Plan 2017 seeks the delivery of a footpath/cycleway across the Worthing-Sompting Local Green Gap to facilitate access from West Sompting allocation to East Worthing. The eastern end of this footpath/cycleway is likely to be in the vicinity of Decoy Farm, and we ask that this is had regard to, and reflected in emerging policy.

Other Matters:

Since the adoption of the Adur Local Plan, permission has been granted (subject to signing of s106 and call-in) for development at New Monks Farm (including 600 dwellings and Ikea store) and Shoreham Airport. Again I would ask that the transport implications of these developments be taken into account in any future work.

General comment: references to major development (eg, Policy CP1) should be referred to as '10 dwellings or more' rather than '10+ dwellings' in order to avoid confusion, and be consistent with the definition set out in the Town and Country Planning (Development Management Procedure) (England) Order 2010. The full definition also refers to sites of 0.5 hectares or more. The definition within the Glossary also refers to '10 or more houses' – this should be corrected to 'dwellings'.

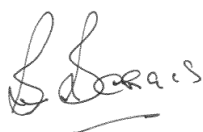
Adur DC welcomes Policy CP24s recognition of the need to continue working with WSCC and other agencies to support improvements to the A259 and A27 (capacity and consequent congestion problems). Adur will continue to address a range of transport matters with WBC, including the currently emerging Adur and Worthing Local Walking and Cycling Plan.

Conclusion:

ADC welcomes the progress made on the WLP, and acknowledges the efforts made to maximise opportunities to meet development needs in the Borough.

Adur DC invite Worthing to continue joint working with Adur on relevant planning policy evidence studies, where relevant, which could include further explorations of residential development capacity and/ or innovation housing solutions.

Yours sincerely



Brian Boggis
Executive Member for Regeneration

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	Jeff Barker
------	-------------

General comments

I am writing to inform you that I agree with your decision made under the following:

GORING GAP SOUTH AND GORING GAP NORTH(known as Chatsmore Farm) (SP5 &SP6-LP pages 25-37) to designate and provide protection for that area.

REFERENCE

DWLP-M -71

Date received:
11/12/2018

Mr T Moseley

11 December 2018

james.appleton@adur-worthing.gov.uk
ian.moody@adur-worthing.gov.uk

Dear Mr Appleton and Mr Moody

Draft Worthing Local Plan

I am writing to defend my land (WSX264408) from your intentions of making it Local Green Space. I find the application astonishing, my land is of some 2 acres along the southern part of your Local Green Space proposal, to my south is Marine Drive and then greensward leading to the seafront. I have engaged with the Planning Department and have expressed my interest in working with yourselves and the local community to use the land for other means whereby people can truly enjoy the area, ie seasonal campsite, watersports centre, cycling centre, cafe etc; there are lots of options other than housing. The land is the last piece of land in Worthing which is in a position to facilitate other means. Its location is in an area which the Local Plan has expressed it would like to enhance and also is in an area which can help the Local Plan fulfill its requirements for tourism and accommodation and also well-being (regeneration) etc and an area local groups are passionate about, this would also allow people to enjoy the areas by giving them access.

The government guidelines are quite clear as to what land qualifies as Local Green Space and the Goring Gap, where my land is located, clearly does not fill the criteria on all counts and, therefore, clearly demonstrates non suitability.

The Goring Gap is 33 ha (82 acres) of agricultural land (an extensive tract of land) and is also made up of a further 4 ha (10 acres) of playing fields and another area with a recreation area. The two playing fields would be a sensible application for Local Green Space, however, there is also a huge amount of land not included - the large amounts of land surrounding the application which are Ilex Way, a one mile long tree avenue, the Plantation leading down to the sea and also the 20 ha (50 acres) of Goring greensward, all of which have public access and are in close proximity to housing; none of these are in the proposal for Local Green Space, but are fully available for the public to enjoy.

The application has just simply taken all the fields of agricultural land, which have no public access. However, the Suitability Report suggests dog walkers use this land, but omits that they are trespassing and damaging crops. The Landscape Report Open Space Assessment of my land quotes "as a natural/semi-natural greenspace with low quality score of 14% and value score of 32%" (one of the worst in district) and the fields are of little to low wildlife value. For what reason would this application help this area when all the surrounding area has more wildlife value, beauty enjoyment and access and yet these areas are not in the Local Green Space application?

Natural England ANG st, used by Cheltenham Borough Council, referred to in the Suitability Report recommends that everyone, wherever they live, should have accessible natural green space, 5 acres for 300 metres away 20 hectares 1.25 miles from home - the National Park South Downs which is 628 sq mi 87 miles long is within a stones throw away! This area already well exceeds these figures further demonstrating your Local Green Space application is not suitable. The district enjoys over 20% open green space and this is not including the South Downs and the beach. Adur and Worthing Open Space, Playing Pitch and Sports Study refers to usable space amenity - the fields have no access and are private land. It is of no reason to red tape this land making it more difficult for land owners for the future. The application for the Goring Gap is motivated and has no grounds for Local Green Space as per government guidelines. The Suitability Report refers to two other example sites (Cheltenham and Havant) to try to justify the large extract of land in the application; these two areas, however, do not enjoy the vast areas of green and sea already available to the Worthing community.

Persimmon Homes Severn Valley at the Backwell Neighbourhood Plan Examination were successful in their submissions. The Examiner, Mr McGurk, in his report of 29 October 2014 clarified that Farleigh Fields which measures 19 hectares comprises an extensive extract of land. Goring Gap is 33 hectares in size! This does meet the criteria of Paragraph 77 NPPF.

The Suitability Report refers to the Issues and Options Consultation (a questionnaire) which allowed people to have their say on the Local Plan. The Consultation from the Issues and Options referred to the Goring Gap and Chatsmore Farm area as having overwhelming concerns for future development, ie houses. It contained two loaded questions and only included Goring Gap and Chatsmore Farm. Following the Consultation, out of 106,640 residents only 261 people responded of which 183 ticked these two boxes and half of these people were not in the District! Also the Suitability Report omitted the comments of people who thought differently.

The maps used for the application are inconsistent (Landscape Architect Masterplanning Ecology) plan HDA 1 to plan HDA 3, one is missing the recreation ground and the Local Plan map only showing in part Ilex Way. Not one is the same area? Of all the maps, what are the reports referring to? The report is using the positives of the playing fields and yet these are not separated from the agricultural fields and so the report muddies the water to make the whole application look good.

The photos used in the Suitability Report are years old. Photograph A (looking south from Highdown Hill fort) excludes the Rampion Windfarm which, in my opinion, now dominates the view. HDA 3 drawing refers to views from this same perspective and refers to an undeveloped coast line - this is clearly not the case. If this was the viewing platform for planning considerations the current and newly proposed tower blocks in Worthing on the seafront would never have been approved, also to the left of Photograph A is a commercial recycling centre on the hill!

Referring to drawing HDA 3, Goring Gap can only be viewed from the south elevation. This elevation is also able to enjoy the English channel with views to Brighton and the Isle of Wight the other way. When walking along the seafront (greensward) it is a popular place for parking so the view from the south is generally encumbered by cars, motorhomes etc.

I am not sure why the Council is proposing to take such a large extensive tract of land which will make it impossible for it to fulfill its requirements for the future Local Plan - government requirements are that it must be capable of enduring beyond the end of the plan period.

The land owners can work with the Council and the community to enhance the area and keep its appearance; putting Local Green Space on this land is just a back door to stop any future development to land that is already protected with Article 4. I kindly ask that you remove my land from this draft proposal.

Finally, I was not aware of this consultation. I have spoken direct to Mr Moody and can advise that these are my initial comments and Mr Moody has stated that I will be able to put further views to you in writing after the consultation period has expired and he has confirmed that these will be taken into consideration.

Yours sincerely

Tim Moseley

REFERENCE

Comment No: DWLP-M- 72

Date Received: 10.12.18

Mr and Mrs I Hunt



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

9 December 2018

Dear Sir

WORTHING LOCAL PLAN

We moved to Goring from Gloucestershire in May 2016. We chose this area because it was by the sea, largely bungalows, flat and close to amenities. It also had the feel of the countryside due to its nearby open spaces. We like to walk regularly away from the built-up area and prefer to be able to do so from home rather than having to drive somewhere else to do so. We also enjoy seeing the birdlife on the Goring Gap (South).

In the short time we have lived in Goring we have noticed with concern the increase in traffic on the local roads and believe that any large-scale residential development in the area will greatly worsen the situation.

GORING STRATEGIC GAP – South and North (known as Chatsmore Farm)

We welcome Worthing Borough Council's decision to designate and provide protection to the Goring-Ferring strategic gap.

We strongly support WBC's belief that –

- These Local Gaps (SP5) are important in preserving Worthing's character and identity by preventing settlement coalescence
- These Local Gaps (SP5) are the only part of the undeveloped coastline between Littlehampton and Roedean which provides a visual connection between the undeveloped coastline and the South Downs National Park
- The Local Gap (North) (SP5) has substantial ecological value with rare and protected birds and bats
- These Local Gaps (SP5) offer people leisure activities which promote health and well-being in our community
- These Local Gaps (SP5) have informal footpaths that allow locals and visitors to walk and exercise their dogs.
- These Local Gaps become designated as a Local Green Space (SP6) which will help protect this area for future generations
- This Local Gap (SP5) and Local Green Space (SP6) are valued for their historic association, views, wildlife and bird-watching, black skies to enjoy stargazing and tranquillity which is not found in other parts of Worthing due to it being built up.
- This Local Green Space (SP6) is a valued place for relaxation and exercise

We enjoy the qualities for which the Local Gap and Local Green Space is valued.

The Greensward – Village Green status (CP8)

We note the WBC recognises the demand for parks and open spaces and Worthing does appear to be lacking in the number of such areas. With reference to this commitment, we request that specific recognition of the Goring Greensward's Village Green status with its associated legal protection is identified in the plan

The Coastline (CP13)

One of the things we enjoy most is the natural coastline with its associated vistas and access to views which we would see protected for the enjoyment of Worthing Residents and visitors. This not only enhances the wellbeing of residents and visitors, it is also a causal factor in people choosing to live in and visit Worthing and a major contributor to the local economy.

Whilst not in the Local Plan we would **definitely object** should WBC continue with their plans on increasing the beach huts from George V to Sea Lane Café as these would further detract from the views of the sea currently gained by walkers along the coastal path. We would question the need given the lack of use made of many of the existing huts.

We would like to thank Worthing Borough Council for their continued commitment to Goring and with things that the residents hold dear and what makes Goring – Goring.

Yours faithfully

IAN & NICOLA HUNT

REFERENCE

DWLP-M -73

Date received:
11/12/2018



Our ref: LN3628

Ian Moody

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

11 December 2018

Dear Ian,

DRAFT WORTHING LOCAL PLAN CONSULTATION - RESPONSE ON BEHALF OF MR CLEM SOMERSET

On behalf of our client, Mr Clem Somerset, please find enclosed the following in response to the consultation on the Regulation 18 Draft Local Plan:

- Completed consultation form
- Statement to justify allocation
- Drawing no A111471_LA_001_Rev A – Opportunities and Constraints
- Drawing no A111471_LA_002_Rev B – Illustrative Masterplan

I look forward to discussing these representations with officers.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Nigel Abbott'.

Nigel Abbott

Director - Planning

WYG Environment Planning Transport Limited

Enc

Cc C Somerset Esq

11th Floor, 1 Angel Court, London, EC2R 7HJ
Tel: +44 (0)20 7250 7500 Fax: +44 (0)20 7250 7501
Email: nigel.abbott@wyg.com Website: www.wyg.com

WYG Environment Planning Transport Limited. Registered in England & Wales Number: 03050297
Registered Office: Arndale Court, Otley Road, Headingley, Leeds, LS6 2UJ



creative minds safe hands

Office use Only:	
Comment number	
Date received	

Draft Local Plan for Worthing Consultation Document October 2018 Comments Form

**This consultation runs from Wednesday 31st October
 to 5pm on Wednesday 12th December 2018**

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


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

Phone: 01273 263000

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		
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Address line 2	1 Angel Court		
Town	London		
Postcode	EC2R 7HJ	Telephone	020 7250 7511
Email address	nigel.abbott@wyg.com		

Name	Nigel Abbott	Date	11.12.18
Signed			

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.

Note: Unless you request otherwise (by putting a cross in the box to the right), all respondents will be added to the Worthing Local Plan consultee database and will be notified at all subsequent stages of Local Plan progression.	No: please don't add me	<input type="checkbox"/>
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In addition, if you would like to subscribe to the Worthing Planning Policy Newsletter (which covers a wide range of Planning Policy issues) then please put a cross in this box:	<input type="checkbox"/>
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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. However, contact details will not be published. Unfortunately, we cannot accept or report confidential or anonymous responses. Further information about how personal information is processed can be found on the Council's website in the Planning Policy Privacy Notice:

<https://www.adur-worthing.gov.uk/planning-policy/privacy-notice/>

All data will be stored securely in line with the GDPR.

SECTION B – COMMENTS

As set out below, this consultation document is formed of four parts. It would be helpful if you provide your comments under the relevant sections together with relevant policy number, paragraph and page numbers. However, if your comments are more general then your comments can be inserted in the box below.

GENERAL COMMENTS

-

This box is a fixed size - please continue on separate sheet(s) at the end if necessary

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 1 - INTRODUCTION AND CONTEXT

(this 'part' includes characteristics of the borough/issues and challenges and vision & strategic objectives)

-

PART 2 - SPATIAL STRATEGY

(this 'part' sets out the proposed spatial strategy (what development and where) and the policies to deliver it)

Our comments relate to the Council's proposed Policy SP3 which sets out the proposed delivery of substantially less than the objectively assessed level of housing need. Whilst the reasons for this proposed under delivery against need are acknowledged and understood, we would comment that this position presents a clear imperative for the Council to allocate the proposed Omission sites, particularly site OSI (Land East of Titnore Lane).

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 3 - DEVELOPMENT SITES

(this 'part' includes details of the proposed future development sites)

Our comments are made in relation to Omission Site 1 (OS1) (Land east of the Titnore Lane) – see attached statement which sets out in more detail our comments to provide greater confidence that the site can be delivered.

PART 4 CORE POLICIES - HOMES AND NEIGHBOURHOODS (Policies CPI – CP6)

-

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 4 CORE POLICIES – SUSTAINABLE COMMUNITIES
(Policies CP7 – CP10)

-

PART 4 CORE POLICIES – LOCAL ECONOMY
(Policies CP11 – CP14)

-

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 4 CORE POLICIES – HISTORIC ENVIRONMENT
(Policies CP15 – CP16)

-

PART 4 CORE POLICIES – ENVIRONMENT AND CLIMATE CHANGE
(Policies CP17 – CP23)

-

This box is a fixed size - please continue on separate sheet(s) at the end if necessary

PART 4 CORE POLICIES – TRANSPORT AND CONNECTIVITY
(Policies CP24 – CP25)

-

This box will grow to allow you to add extra comments

Additional comments continuation sheet(s) -
please mark clearly which section your comments carry on from

-



LEGEND

Red line boundary

20m buffer to Ancient Woodland

5m buffer to existing landscape features

Landscape buffer to South Down NP

Proposed green corridor connections

Proposed site access

Proposed access to northern field

Existing overhead pylon





LEGEND

- Red line boundary
- Pedestrian routes and connections

73 Plots of mixed tenure of detached, semi-detached and terraced housing



Statement to justify Omission Site OS1 (Land East of Titnore Lane) as an allocation

On behalf of our client and the landowner of Omission Site OS1, Mr Clem Somerset, we provide below our further comments in response to the issues that the local planning authority, Worthing Borough Council have highlighted need addressing to convince the local planning authority to allocate the site for development in the Local Plan.

Before doing so, in principle we welcome the Council's interim position of denoting the site as an Omission Site meaning that it considers the site could be suitable for development subject to addressing the identified concerns.

As the text notes, the current Core Strategy Proposals Map shows the land as falling within the West Durrington Strategic Development Area. We note that the Council's Landscape Study concluded that "the site is potentially suitable in landscape, visual and ecology terms for limited development proposals, but would need to demonstrate no adverse impacts on the setting of the adjacent National Park, the adjacent ancient woodland or the wider landscape."

The text on page 73 of the Regulation 18 Draft Worthing Local Plan sets out why the site is not currently considered suitable for development.

The first reason is that it has not been demonstrated that residential development would not result in the loss or deterioration of ancient woodland (an irreplaceable habitat) or have a negative impact on the Local Wildlife Site. Comments are provided by the Council's Landscape consultant in relation to the previously submitted masterplan housing layout for 126 units, who felt that the scheme would compromise the integrity of the internal woodland and hedgerow and potentially reduce the screening potential of the roadside hedgerows. Any proposals should respect current Natural England standing advice with regard to ancient woodland. It is stated that a less intensive land use than shown on the previously submitted layout may provide a more acceptable solution to the development of the site.

The second reason is that subject to a reduction in the current speed limit, safe and suitable access may be achievable from Titnore Lane, but further evidence is required to demonstrate this.

In response to these comments, the landowner has commissioned WYG Urban and Landscape Design team to prepare a revised masterplan layout that specifically addresses the concerns expressed above and is included as part of our representations.

An Opportunities and Constraints drawing (A111471_LA_001_Rev A) has been prepared that clearly shows we have identified the range of constraints that a revised layout must consider and address.

These constraints and opportunities include:

- The need to maintain a 20-metre buffer to the ancient woodland along both the northern (with the National Park) and southern boundaries to the site;
- The provision of a 5-metre buffer to existing landscape features;
- Providing a landscape buffer to the western boundary facing that section of the National Park;
- The opportunity to provide green corridor connections north south through the site and to the east;
- The provision of a link through the central woodland shaw via the pylon routing corridor to provide road access through to the northern field.

Having regard to the above constraints and opportunities, the comments made by Hankinson Duckett on the previous masterplan layout and recommendations in the Phase 1 Ecological Survey, a revised illustrative masterplan layout drawing (A111471_LA_002 Rev B) has been produced that reduces the number of dwelling plots from the previously shown 126 to 73 whilst retaining the previously proposed access point onto Titnore Lane which was originally selected based on detailed traffic and modelling by our transport team. The scheme has been amended as follows:

- The route and alignment of the spine road has been amended so instead of looping around the eastern end of the site, the road serving the plots on the northern side of the shaw is provided through the existing gap;
- The spine road is provided around the outside of the developable zone with the house plots pulled away from the 20-metre buffer beyond the road;
- The plots are orientated so that the frontages of the houses face the ancient woodland and back gardens are placed well away;
- The hedgerow at the eastern end of the site is proposed to be retained and enhanced and a semi-natural woodland and glade habitat created linking with the central woodland shaw with informal public open space access to the area;
- The existing western boundary, with the exception of the section needed for the new access off Titnore Lane, is retained and is proposed to be widened to provide a wider landscape buffer to the South Downs National Park opposite;
- Green corridors are provided across the middle of the site from north to south to provide opportunities for links across the site.
- A link access track as a spur in the south east corner of the site has been introduced to Somerset Lake in lieu of the existing access along the southern edge of the southern field to the lake

The following comments are provided by our landscape design team and our Ecology team are fully supportive of the layout proposed. There are a number of existing landscape and ecological features that enhance the site, create a mature setting and provide biodiversity for wildlife. All these elements have been retained and enhanced: the central woodland shaw is retained and also extended to the east linking with the wider woodland complex beyond the site. Additional green corridor connections have been created: the existing hedgerow in the northern field is retained and enhanced with an

additional section added continuing it through the southern component of the site creating a meaningful connection for wildlife and attractive landscape feature within the site. Appropriate landscape and ecological buffers are proposed to the Ancient Woodland and existing landscape and ecological features. The existing western boundary planting to the National Park will be retained and extended to create a wide buffer to the park limiting intervisibility and impact from development onto it.

We have shown 73 plots on the layout. This mixture of detached, semi-detached and terraced plots is an appropriate, low density tenure in this attractive and contained setting on the edge of Worthing bounding the South Downs National Park, Ancient Woodland and countryside beyond. The housing layout responds to the opportunities and constraints of the site creating an attractive set of character areas within the varying landscape settings. All housing positioned along the Ancient Woodland fronts onto it to minimise impact onto the sensitive habitat. The robust 20m buffers of native vegetation will further offset and screen the development and go beyond the minimum 15m offset required by Natural England guidance.

The proposals include an area of POS to the western boundary which will provide attractive open space for new residents and set development further back from the National Park boundary. A new area of semi-natural woodland on the eastern boundary of the site will create new habitat and an area of informal open space for residents. A series of footpaths will link the open spaces and residential areas for people to move easily through the site.

The second issue that the local planning authority has indicated needs addressing is that subject to a reduction in the current speed limit, safe and suitable access may be achievable from Titnore Lane but further evidence is required to demonstrate this. Our transport team has undertaken considerable work to establish that a suitable access can be provided to the site from Titnore Lane. A Site Accessibility Appraisal and Transport Feasibility Study Report was produced by our transport team in April 2017 and this was submitted to the local planning authority in support of the allocation. Subsequent to this, a Speed Limit Appraisal Report was prepared and issued to the local planning authority in March 2018 which concluded:

"A review of Titnore Lane has been undertaken with a view to reducing the speed limit from 60mph to 40mph. The assessment has been undertaken in accordance with DfT circular 01/2013 together with the Speed Limit Appraisal Tool as requested by West Sussex County Council Highways Officers.

Traffic data from 2017 has been used, along with updated accident data, and a review of the

geometry and roadside environment has been undertaken to determine vehicle speeds and their effect on road safety, such as forward visibility and the composition of vehicular and non-motorised traffic.

An accident cluster was identified around a bend at South Lodge, approximately 550m north of junction of Titnore Lane and Titnore Way. The cluster was concentrated on a kink in the road which forms an S-bend. Several of the incidents involved one vehicle leaving the carriageway, with no other vehicles involved.

It is considered that these incidents in the vicinity of South Lodge could be attributed to excessive speed at the bend, given the pattern of accidents and road geometry in the location. Consequently, it is proposed to reduce the speed limit along Titnore Lane for a distance of 750m north of its junction with Titnore Way. This would be enforced with new Traffic Regulation Orders and the addition of signing and lining from the Titnore Lane Speed Management and Hazard Awareness Scheme required as a planning condition to the West Durrington Southern Sector development currently under construction. Furthermore, the need for the reduction in the speed limit would be logical and further justified by the installation of traffic signals at the junction of Titnore Lane with Titnore Way as identified in the West Durrington Northern Sector Planning Application. The residential development proposal for Titnore Lane would generate additional frontage on Titnore Lane that would change the perception of the road to being more urban and thereby further encouraging slower traffic speeds.

Application of the SLAT assessment tool has shown that the adverse economic impact of the small increase in journey times generated by the reduced speed limit would be significantly offset by the significant economic benefit brought about from a reduction in accidents along Titnore Lane.

Consequently, it is considered appropriate to reduce the speed limit along Titnore Lane from 60mph to 40mph, and this would be realistic and enforceable based on existing and projected traffic speeds”.

As set out above, works to the immediately surrounding highway network are required both through the existing Section 106 Agreement for the main West Durrington Southern Sector development as well as the signalisation of the Titnote Way / Titnore Lane junction as required by Schedule 3 of the soon to be completed Section 106 Agreement for the West Durrington Northern Sector scheme. It should also be remembered that the work undertaken for the Titnore Lane Omission Site was on the basis of 126 dwellings as were previously shown on the illustrative Masterplan Layout whereas the layout now is for a lower number of units, 73.

From discussion with officers at the recent drop in session, it was indicated that the greatest concern over whether the police would support the principle of reducing the speed limit along Titnore lane to

40mph. The average speed of vehicles using Titnore Lane as set out in paragraph 2.18 of the Speed Limit Appraisal is 41.4mph with an 85th percentile speed of 46.2mph. This is not significantly above the assumed 40mph speed limit and therefore we assume the Police are unlikely to object.

We have also noted the information relating to the site provided in Appendix D of the WSP produced Worthing Local Plan Transport Assessment report dated August 2018. In particular that WSP state: "It is considered that the principle of safe access from this site is possible with the introduction of a 40mph speed limit on Titnore Lane. The design for the site access junction would have appropriate visibility for a 40mph speed limit on the major road. It is considered that the junction of Titnore Way will also require signalisation, and appropriate junction designs will need to be agreed with the local highway authority."

WSP's comments in relation to the need to provide footway provision was acknowledged and included in the WYG Transport April 2017 Report in any event.

We consider that the above information, combined with the revised masterplan layout should be considered sufficient enough to address the concerns of the local planning authority that are currently preventing the site from being identified as a proposed allocation.

Finally, we wish to express concern at the note at the end of the Omission Site OS1 text which states if the site is allocated for development in the Local Plan, the Council's Policies Map will be amended so that the Built-Up Area Boundary runs along the eastern boundary of the site. Whilst we have provided what we consider to be sufficient information to address the concerns, we would object to the site being deleted from the Built Up Area Boundary given that there is an acknowledged acceptance that development of the site could be considered appropriate, the site has been located within the boundary for many years and the overwhelming need to provide housing within a severely constrained borough that cannot meet its own housing needs.

Draft Local Plan for Worthing Consultation Document October 2018 Comments Form

**This consultation runs from Wednesday 31st October
 to 5pm on Wednesday 12th December 2018**

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

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

Phone: 01273 263000

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	Mayall		
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Address line 2	Lewes Road		
Town	Brighton		
Postcode	BN1 9PY	Telephone	01273 663742
Email address	Planning.policy@southernwater.co.uk		

Name	C Mayall	Date	11 December 2018
Signed	C Mayall		

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.

Note: Unless you request otherwise (by putting a cross in the box to the right), all respondents will be added to the Worthing Local Plan consultee database and will be notified at all subsequent stages of Local Plan progression.	No: please don't add me	
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In addition, if you would like to subscribe to the Worthing Planning Policy Newsletter (which covers a wide range of Planning Policy issues) then please put a cross in this box:	
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PART 2 - SPATIAL STRATEGY

(this 'part' sets out the proposed spatial strategy (what development and where) and the policies to deliver it)

Policy SP5 Local Green Gaps and SP6 Local Green Space

Request boundary amendment to Policy Map

Southern Water understands the council's desire to maintain gaps between settlements as well as protecting areas of recreational green space for the benefit of the community. However, we note that the gap/local green space designated to the east of the Borough, identified as Brooklands Recreation Area, includes a parcel of land that forms the northernmost tip of East Worthing Wastewater Treatment Works (WTW) – an area of land that is owned by Southern Water. East Worthing WTW treats wastewater arising from all of Worthing Borough, as well as Lancing to the east.

Although there are no current plans, Southern Water may in future need to increase processes and/or capacity at this WTW in order to meet the demands of population growth across the catchment, or to meet stricter environmental standards. Our concern is that the designation of Southern Water's land under Policies SP5 and SP6 could restrict its ability to carry out its statutory functions by precluding the development of further essential wastewater treatment infrastructure on its land.

For health, safety and security reasons, the area of land in question is not publically accessible, and is fenced off to prevent unauthorised access to the WTW. It is therefore not connected to the recreational uses associated with Brooklands Park.

Southern Water would therefore request that the boundary of the designated Brooklands Recreation Area be realigned to exclude Southern Water's land in order to reflect its association with the land use of the WTW, rather than with the Park. A map outlining Southern Water's land ownership is attached.

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 3 - DEVELOPMENT SITES

(this 'part' includes details of the proposed future development sites)

Development Sites A2-A7, AOC1 and AOC3

Additional criteria required

In line with paragraph 162 of the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG), Southern Water has undertaken an assessment of existing infrastructure capacity and its ability to meet the forecast demand for each of the development sites set out in the Worthing Draft Local Plan. That assessment reveals that reinforcement of the local sewerage network would be required to accommodate the proposed development at the following sites;

A2 Land West of Fulbeck Avenue
A3 Land at Upper Brighton Road
A4 Decoy Farm
A5 Teville Gate
A6 Union Place
A7 Grafton Site, Marine Parade
AOC1 Centenary House
AOC3 Stagecoach Bus Depot, Library Place

This reinforcement will be provided through the New Infrastructure charge but Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development.

Therefore, whilst a lack of capacity is not a fundamental constraint to development, new or improved infrastructure would need to be provided in parallel with the development.

Southern Water has limited powers to prevent connections to the water and sewerage networks, even when capacity is limited. Planning policies and planning conditions, therefore, play an important role in ensuring that development is coordinated with the provision of the necessary infrastructure.

Unless planning policies support delivery of necessary underground sewerage infrastructure there is a risk that it will not be delivered in parallel with the development, leading to an unacceptable risk of foul water flooding in the area to both new and existing residents. This situation would be contrary to paragraph 109 of the NPPF, which requires the planning system to prevent both new and existing development from contributing to pollution.

In addition, our assessments revealed that Southern Water's underground infrastructure crosses the each of the above named sites. This needs to be taken into account when designing the site layout. Easements would be required, which may affect the site layout or require diversion. Easements should be clear of all proposed buildings and substantial tree planting.

We therefore request the following provision be added to the Development Requirements section of each of the sites listed above;

- Phase occupation of development to align with the delivery of sewerage infrastructure, in collaboration with the service provider.
- Layout is planned to ensure future access to existing water and/or wastewater infrastructure for maintenance and upsizing purposes.

Additional comments continuation sheet(s) - PART 3 - DEVELOPMENT SITES

Site A7: Grafton Site

Additional criteria required

In addition to the above, site A7 incorporates Southern Water's Grafton Car Park Wastewater Pumping Station (WPS) and Surface Water Pumping Station (SWP), and we note this has been acknowledged within the site constraints/requirements. We would add that, where relocation of existing Southern Water infrastructure is not feasible, easements may be required (in the case of underground infrastructure), and a 15 metre gap between the pumping station and any residential dwelling would be required in order to mitigate noise and vibration arising from the operation of the pumping stations.

We therefore request the following provision be added to the Development Requirements section of Site A7:

- A 15 metre gap between the pumping station and any sensitive development (such as housing) should be taken into consideration in the site layout.

PART 4 CORE POLICIES – SUSTAINABLE COMMUNITIES (Policies CP7 – CPI0)

Policy CPI0 Infrastructure Delivery

Support

Southern Water is the statutory water and wastewater undertaker for the Borough of Worthing. We are pleased to note that the delivery of utility infrastructure is supported within this policy. This will help to ensure the timely provision of additional capacity to meet the demand arising from new and existing development.

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 4 CORE POLICIES – ENVIRONMENT AND CLIMATE CHANGE (Policies CP17 – CP23)

Policy CP17 Sustainable Design

Support

Southern Water's supply area is designated as an 'area of serious water stress' as advised by the Environment Agency (EA Final Classification 2013), and Southern Water has focussed on a twin track approach of reducing leakage across its network whilst also encouraging greater water efficiency in homes and businesses. Southern Water therefore supports the inclusion of part a) iii of Policy CP17 which sets higher water use efficiency standards of 110 l/p/d for all new dwellings.

Policy CP22 Water Quality and Protection

Support

Southern Water welcomes the inclusion of a policy that seeks to protect the quality and yield of water resources, whilst also mitigating the risk of pollution, either through foul flooding (that may be caused by occupation of development ahead of the wastewater infrastructure required to serve it) or groundwater contamination.

This box is a fixed size - please continue on separate sheet(s) at the end if necessary



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

REFERENCE

DWLP-M -75

Date received: 11/12/2018

10th December 2018

By Email: worthinglocalplan@adur-worthing.gov.uk

Dear Sir/Madam,

WORTHING DRAFT LOCAL PLAN 2016 – 2033– REGULATION 18 CONSULTATION

This is a joint representation made on behalf of Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living (referred to in the representations as “The Consortium”).

We are a group of independent and competing housebuilders specialising in sheltered housing for the elderly. Together as a group, we are responsible for delivering circa 90% of England’s specialist owner occupied retirement housing.

These representations are made in respect of the Worthing Draft Local Plan 2016 – 2033– Regulation 18 Consultation. My Client would like to commend the Council’s willingness to positively address the projected rise in the elderly population within the Borough and the serious issues this raises with regards to the future provision of adequate support and accommodation for elderly persons. We also have some concerns over some aspects of the wording of the wording and supporting text of **Draft Policy CP1 Housing Mix, Draft Policy CP3 Affordable Housing and CP8 Open Space, Recreation and Leisure** for the reasons set out below.

The NPPF stipulates that the planning system should be supporting strong, vibrant and healthy communities by providing the supply of housing required to meet the needs of present and future generations. Paragraph 61 of the NPPF highlights that the *‘the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes.’*

The National Planning Practice Guidance reaffirms this in the guidance for assessing housing need in the plan making process entitled **“How should the needs for all types of housing be addressed?”** (Paragraph: 021 Reference ID: 2a-021-20140306) and a separate subsection is provided for **“Housing for older**

people". This stipulates that *"the need to provide housing for older people is critical given the projected increase in the number of households aged 65 and over accounts for over half of the new households (Department for Communities and Local Government Household Projections 2013). Plan makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to move. This could free up houses that are under-occupied. The age profile of the population can be drawn from Census data. Projections of population and households by age group should also be used. The future need for older persons housing broken down by tenure and type (e.g. Sheltered, enhanced sheltered, extra care, registered care) should be assessed and can be obtained from a number of online tool kits provided by the sector. The assessment should set out the level of need for residential institutions (use class C2). But identifying the need for particular types of general housing, such as bungalows, is equally important"* (My emphasis).

The recently published 'Housing White Paper: Fixing our broken housing market' clearly signals that greater consideration must be given to meeting the needs of older persons' in Local Plans stipulating that:

*'Offering older people a better choice of accommodation can help them to live independently for longer and help reduce costs to the social care and health systems. We have already put in place a framework linking planning policy and building regulations to improve delivery of accessible housing. To ensure that there is more consistent delivery of accessible housing, **the Government is introducing a new statutory duty through the Neighbourhood Planning Bill on the Secretary of State to produce guidance for local planning authorities on how their local development documents should meet the housing needs of older and disabled people.** Guidance produced under this duty will place clearer expectations about planning to meet the needs of older people, including supporting the development of such homes near local services⁸². It will also set a clear expectation that all planning authorities should set policies using the Optional Building Regulations to bring forward an adequate supply of accessible housing to meet local need. **In addition, we will explore ways to stimulate the market to deliver new homes for older people.**'* (Para 4.42) (My emphasis).

Draft Policy CP1 Housing Mix

Overall such a policy supporting the provision of older people is encouraging but there are aspects of the supporting text which may constrain the delivery of this much needed accommodation. For example:

CP1 Housing Mix Part c) states the following:

To provide suitable housing and genuine choice for Worthing's population, including disabled people, older people and families the Council will expect all relevant applications to meet the optional higher Building Regulations standard for Accessible and Adaptable dwellings where feasible and viable. In particular, residential development must ensure that: i. all new build dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'; ii. for major developments (10+ dwellings), that at least 10 percent of new build dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings', i.e. designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users.

This approach is inconsistent with national policy. Paragraph 56-009 of PPG states that: *"Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling."* The Council

should therefore not apply the higher level Part M4(3) to market homes. The Council should amend this part of the policy and clearly state that this will not apply to market homes.

We consider that the best approach towards meeting the diverse housing needs of older people is one that encourages both the delivery of specialist forms of accommodation such as sheltered / retirement housing and Extra Care accommodation and a separate requirement for homes to be built to a standard that is *suitable* for the elderly.

Draft Policy CP3 Affordable Housing

It is of course well established that most forms of affordable housing are inappropriate for a retirement housing scheme and that the delivery of affordable housing is more appropriately dealt with by way of an offsite financial contribution. The nature of typical retirement housing sites is such that sites are small and constrained making it impossible in most cases to provide separate cores to facilitate different management arrangements. Mixed tenure single core buildings have been found to be impracticable in terms of achieving sustainable communities due to the requirement for all residents to pay equal service charges. As such, it is common practice to agree to off-site contributions or cash in lieu payments towards the provision of affordable housing on nearby sites or to be invested in Registered Provider of council development programmes. The including of an allowance for offsite contributions in exceptional circumstances is therefore encouraging.

The Council has not considered the economic viability of development to inform the targets set out within the Local Plan. We cannot find an updated Viability Assessment and it is therefore assumed that the Council is relying on the Adams Integra viability research undertaken in 2007. To inform the local plan review on an outdated document would seem to directly contravene NPPF Para 31 which states that the *“preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals”*.

In light of the recent changes to the NPPF, we would ask to be kept updated on any supplemental information that is prepared in support of the viability evidence and to be kept informed on the progress of the local plan and in particular the submission to the Examination Inspector.

CP8 Open Space, Recreation and Leisure

This policy requires all residential development to contribute towards Recreation and Open Space Facilities. Picking up on the Community Infrastructure Levy Regulations 2010, which with the inclusion of paragraph 122(2) states;

A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is—

(a) necessary to make the development acceptable in planning terms;

(b) directly related to the development; and

(c) fairly and reasonably related in scale and kind to the development.

This is now a legal requirement as opposed to previous policy guidance meaning that any planning obligations have to be ‘necessary’ to make the consent lawful. Unfortunately, the use of such a wide-reaching tariff to cover all types of residential including specialist retirement housing would fail the “necessary” test as well as contributions not being calculated in a fair and reasonable way relating in scale and kind to the nature of specialist residential developments for older people.

It is assumed that specialist retirement housing would be exempt from elements of the contributions towards the provision of recreation and open space facilities where there is limited or no direct relevance or mitigation to be addressed. This perhaps needs to be clarified further in the policy. The need for play areas and open space elements would clearly not be directly relevant to specialist accommodation for older people and yet may be treated the same as say a 4-bedroom house.

Specialist housing for the elderly by its very nature does not accommodate children and in so doing the contributions related to infrastructure for children does not meet the test of the Community Infrastructure Levy Regulations 2010, paragraph 122(2).

We note that contributions will be sought to mitigate the effects of residential development on Recreation, sports and leisure in an area. Retirement Living developments are aimed at the elderly. Residents of such developments tend to be on average 79 years old and suffer from lower mobility. Consequently, the cumulative impact on sports and recreation facilities arising from residents in such developments would be less than that of family or 'general needs housing'.

Seeking development contributions from older persons housing developments at a fixed rate does not therefore *'fairly and reasonably relate in scale and kind to the proposed development'*.

On this basis we request that the requirement to seek contributions for play areas, schools, education and open space elements is either:

- A) Reduced to reflect lower cumulative impact on the facilities arising from these forms of development, or,
- B) Decided on a case by case basis with developer contributions mitigating the impact on facilities likely to be impacted by older persons housing.

Thank you for the opportunity to comment.

Yours sincerely,

Carla Fulgoni

The Planning Bureau on behalf of the Retirement Housing Consortium

Office use Only:	
Comment number	
Date received	

Draft Local Plan for Worthing Consultation Document October 2018 Comments Form

**This consultation runs from Wednesday 31st October
to 5pm on Wednesday 12th December 2018**

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

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

Phone: 01273 263000

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

Section A - Contact Details

First name	Carla Fulgoni		
Last name			
Organisation	The Retirement Housing Consortium		
Address line 1	c/o 100 The Planning Bureau		
Address line 2	100 Hopldenhurst Road		
Town	Bournemouth		
Postcode	BH8 8AQ	Telephone	01202291455
Email address	Planning.policy@theplanningbureau.ltd.uk		

Name	Carla Fulgoni	Date	10/12/18
Signed	C Fulgoni		

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.

Note: Unless you request otherwise (by putting a cross in the box to the right), all respondents will be added to the Worthing Local Plan consultee database and will be notified at all subsequent stages of Local Plan progression.	No: please don't add me	
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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. However, contact details will not be published. Unfortunately, we cannot accept or report confidential or anonymous responses. Further information about how personal information is processed can be found on the Council's website in the Planning Policy Privacy Notice: <https://www.adur-worthing.gov.uk/planning-policy/privacy-notice/> All data will be stored securely in line with the GDPR.

SECTION B – COMMENTS

As set out below, this consultation document is formed of four parts. It would be helpful if you provide your comments under the relevant sections together with relevant policy number, paragraph and page numbers. However, if your comments are more general then your comments can be inserted in the box below.

GENERAL COMMENTS

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PART 1 - INTRODUCTION AND CONTEXT

(this 'part' includes characteristics of the borough/issues and challenges and vision & strategic objectives)

PART 2 - SPATIAL STRATEGY

(this 'part' sets out the proposed spatial strategy (what development and where) and the policies to deliver it)

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 3 - DEVELOPMENT SITES

(this 'part' includes details of the proposed future development sites)

PART 4 CORE POLICIES - HOMES AND NEIGHBOURHOODS (Policies CP1 – CP6)

Draft Policy CP1 Housing Mix,

The NPPF stipulates that the planning system should be supporting strong, vibrant and healthy communities by providing the supply of housing required to meet the needs of present and future generations. Paragraph 61 of the NPPF highlights that the *'the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes.'*

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Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

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PART 4 CORE POLICIES – LOCAL ECONOMY (Policies CPI1 – CPI4)

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 4 CORE POLICIES – HISTORIC ENVIRONMENT
(Policies CPI5 – CPI6)

PART 4 CORE POLICIES – ENVIRONMENT AND CLIMATE CHANGE
(Policies CPI7 – CP23)

This box is a fixed size - please continue on separate sheet(s) at the end if necessary

**PART 4 CORE POLICIES – TRANSPORT AND CONNECTIVITY
(Policies CP24 – CP25)**

This box will grow to allow you to add extra comments

**Additional comments continuation sheet(s) -
please mark clearly which section your comments carry on from**

Continuation from Policy CP1 -6

can be drawn from Census data. Projections of population and households by age group should also be used. The future need for older persons housing broken down by tenure and type (e.g. Sheltered, enhanced sheltered, extra care, registered care) should be assessed and can be obtained from a number of online tool kits provided by the sector. The assessment should set out the level of need for residential institutions (use class C2). But identifying the need for particular types of general housing, such as bungalows, is equally important” (My emphasis).

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‘Offering older people a better choice of accommodation can help them to live independently for longer and help reduce costs to the social care and health systems. We have already put in place a framework linking planning policy and building regulations to improve delivery of accessible housing. To ensure that there is more consistent delivery of accessible housing the Government is introducing a new statutory duty through the Neighbourhood Planning Bill on the Secretary of State to produce guidance for local planning authorities on how their local development documents should meet the housing needs of older and disabled people. Guidance produced under this duty will place clearer expectations about planning to meet the needs of older people, including supporting the development of such homes near local services⁸². It will also set a clear expectation that all planning authorities should set policies using the Optional Building Regulations to bring forward an adequate supply of accessible housing to meet local need. In addition, we will explore ways to stimulate the market to deliver new homes for older people.’ (Para 4.42) (My emphasis).

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This approach is inconsistent with national policy. Paragraph 56-009 of PPG states that: “*Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.*” The Council should therefore not apply the higher level Part M4(3) to market homes. The Council should amend this part of the policy and clearly state that this will not apply to market homes.

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Draft Policy CP3 Affordable Housing

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The Council has not considered the economic viability of development to inform the targets set out within the Local Plan. We cannot find an updated Viability Assessment and it is therefore assumed that the Council is relying on the Adams Integra viability research undertaken in 2007. To inform the local plan review on an outdated document would seem to directly contravene NPPF Para 31 which states that the “*preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals*”.

In light of the recent changes to the NPPF, we would ask to be kept updated on any supplemental information that is prepared in support of the viability evidence and to be kept informed on the progress of the local plan and in particular the submission to the Examination Inspector.

Continuation from CP8

We note that contributions will be sought to mitigate the effects of residential development on Recreation, sports and leisure in an area. Retirement Living developments are aimed at the elderly. Residents of such developments tend to be on average 79 years old and suffer from lower mobility. Consequently, the cumulative impact on sports and recreation facilities arising from residents in such developments would be less than that of family or 'general needs housing'.

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Decided on a case by case basis with developer contributions mitigating the impact on facilities likely to be impacted by older persons housing

REFERENCE

DWLP-M -76

Date received: 11/12/2018



Mr Ian Moody
Planning Policy Manager
Worthing Borough Council
Portland House
44 Richmond Road
Worthing BN11 1HS

Our ref:
Your ref:

Date: 10 December 2018

Dear Mr Moody,

Worthing Draft Local Plan 2016-2033 - Regulation 18 Document

Horsham District Council welcomes the opportunity to comment on the Regulation 18 Draft Worthing Local Plan. Our comments focus on draft policy SP3 “Development Sites” but we also provide comments on draft policies CP1 “Housing Mix”; CP2 “Density”; and CP7 “Healthy Communities”.

Strategic Policy 3 “Development Sites” deals with the provision of housing and employment floorspace in Worthing Borough between 2016 and 2033 (a 17 year Plan period). Policy SP3 states that “During the period 2016-2033, a minimum of 4,182 dwellings (net) will be delivered in Worthing”. This equates to a supply of 246 dwellings per year for the Plan period. We also note the text in paragraph 2.28 which states that Worthing Council intends to carry out further work on housing supply, which will be published in the next draft Local Plan.

Paragraph 2.16 of the draft Local Plan makes reference to “the most up-to-date assessment of objectively assessed local need (based on the standard method and 2016 household projections)”, which equates to a requirement for Worthing Council to provide 753 dwellings per year. In addition, we would point out that the Government’s current consultation on the use of the standard methodology states that it is proposing that the 2014 household data projections be used, instead of the 2016 ones. The 2014 household projections for Worthing Council equate to a requirement for 873 dwellings per year. Horsham Council is very concerned that the new housing target being proposed by Worthing is substantially below both of these Government standard methodology housing targets, equating to less than a third of the calculated provision of housing the Government’s methodology suggests should be provided to meet the needs of the Borough. In a worst-case scenario, and over a 17 year Plan period, a delivery rate of 246 dwellings per year would leave an annual shortfall of 627 dwellings per year, or 10,659 dwellings over the entire Plan period.

Horsham Council acknowledges there are a number of constraints to housing delivery in Worthing Borough but urges Worthing to “leave no stone unturned” in attempting to meet as much of its identified housing need as it possibly can over the Plan period. HDC has examined the Supporting Documents/Evidence Base to the draft Worthing Local Plan. We are unable to find evidence of a detailed urban capacity study having been carried out to test the densities that could be delivered in Worthing Borough. Has this work been done, or is it planned to be carried out? We also note that as part of the Supporting Documents/Evidence Base, there is a Housing Implementation Strategy and Strategic Housing Land Availability Study. The most up-to-date SHLAA is dated December 2017. Indeed, the Housing Implementation Strategy (Working Draft, October 2018) states at paragraph 5.6 that “The SHLAA Update 2017-2018 is currently being undertaken and will be published in December

2018 as part of the AMR. It will reassess all potential site opportunities (and any new sites) to consider their development potential. Whilst the focus in previous SHLAA's has been on previously developed sites in the built up area, a rigorous assessment of edge of town opportunities (including greenfield sites) has also been undertaken". It is therefore unclear whether the new housing target set out in draft Policy SP3 is based on work that has been carried out as part of the latest SHLAA, or is work carried out in 2017. It is vitally important that Worthing Council critically assesses all the capacity available for housing development in the Borough, and clarification is therefore sought on this point.

There are a number of references in the draft Worthing Plan to "regeneration" and "transforming key sites within the urban area". Draft Policy SP3 contains eight allocated sites and six "Areas of Change". These fourteen sites have an estimated housing capacity (but no employment floorspace, apart from "Decoy Farm") attributed to them. It appears from reading paragraph 2.28 that these estimated housing capacities are not based on a thorough capacity study: "In addition, further work is ongoing to clarify both the mix of uses and development capacity of the proposed allocated sites and the Areas of Change". If Worthing Council is serious about regenerating its development sites, then it should be carrying out a thorough examination of the development potential of its key allocated sites and "Areas of Change" with a realistic level of development suggested, rather than estimating a figure, which isn't based on evidence.

The draft Worthing Plan discusses the Government's Standard Housing Methodology, and accepts at paragraph 2.34 that Worthing Borough will only be meeting a third of its housing need over the Plan period. In terms of Duty to Cooperate, though, the only body referred to here is the "Sussex Coast Housing Market Area". Horsham is a member of this group, however work is progressing at a slow rate and it is not considered that this Group will necessarily be able to provide the answer to providing for Worthing's substantial unmet needs. Horsham Council would like to see reference to Worthing Council working with its immediate neighbours on a regular 1:2:1 basis to address Worthing's significant housing needs, and for Horsham Council to be convinced that Worthing Council has undertaken a thorough analysis of development capacity within its Borough. Horsham Council would also like to know what the consequences would be for Worthing Council not meeting its level of Objectively Assessed Local Housing Need. This is not addressed in the draft Local Plan. "Omission sites" are described as "sites where, in principle, a level of development might be acceptable. However, for the reasons set out for each site, the Council has reached a conclusion that, at this stage, sufficient and robust evidence has not been submitted that would provide confidence that the identified constraints could be overcome". Horsham Council considers it vitally important that Worthing Council talks to the relevant landowners (Land East of Titnore Lane; Land North of Beeches Avenue; Worthing United Football Club) to ensure that every effort is made to bring these sites forward for development. In addition, Horsham Council asks that Worthing Council review the merits of the Local Gaps and the proposed Local Green Space designations, given the significant shortfall in housing.

Policy SP3 also sets out the demand for "an indicative minimum of 50,000 sqm of employment floorspace (B1, B2 and B8) and 11,957 sqm of commercial floorspace (retail and leisure)" in the Plan period. The development sites listed in Policy SP3, though, do not (with the exception of A4 Decoy Farm – 28,000+ sqm of employment uses) provide any indication of the quantum of employment and commercial floorspace that might be provided. We would be grateful if this table were updated to give an indicative guide to how much employment and commercial floorspace might be provided at these key sites. There is also a lack of clarity in the plan over whether the future employment requirements take into account of the potential loss of 20,830sqm at the HMRC Offices, Barrington Road (Area of Change 5).


Horsham District Council supports the intention of Draft Policy CP1 'Housing Mix', which states that "the Council will expect all relevant applications to meet the optional higher Building Regulations standard for Accessible and Adaptable dwellings where feasible and viable". We question, however, whether the words "feasible and viable" need to be included, given guidance in the Revised NPPF (paragraph 57) which states that "Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable".

Horsham District Council supports policy CP2 "Density". The terminology requiring residential development to 'optimise' the housing density is supported (CP2.d) and helps to ensure appropriate regard is given to on-site delivery of all commensurate needs, which may include cycle/car parking and areas suitable for children's play. We would, though, like to see further clarity in terms of practice (or additional policy wording) to set out how this might be achieved in practice.

Policy CP7 "Healthy Communities" is supported in principle but we would suggest that the draft policy provides greater clarity over what developments will be expected to do in respect of a) i-vi. In addition, clarity should be provided over what a **Health Impact Assessment** needs to address, so that it is not unduly onerous for developers.

I trust these comments are helpful. We are very concerned, however, at the current lack of detailed evidence provided in the draft Plan as to why Worthing Council is only proposing to meet approximately one third of its identified housing need. We would therefore request an urgent and, following that, regular 1:2:1 meetings between our two councils, so that Worthing can demonstrate in detail to Horsham Council that they have carried out a rigorous testing of development capacity in the Borough, and that "No stone has been left unturned" in seeking to meet identified development needs. Unless this work is carried out, Horsham Council will be left with no option but to object at Worthing's Local Plan Examination.

Yours sincerely



pp. Councillor Claire Vickers
Cabinet Member for Planning and Development

Cc Barbara Childs
Trevor Saunders
Catherine Howe

Mark



Office use Only:	
Comment number	
Date received	

Draft Local Plan for Worthing Consultation Document October 2018 Comments Form

**This consultation runs from Wednesday 31st October
to 5pm on Wednesday 12th December 2018**

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

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

Phone: 01273 263000

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

Section A - Contact Details

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Name	Mark McLaughlin	Date	10 December 2018
Signed			

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.

Note: Unless you request otherwise (by putting a cross in the box to the right), all respondents will be added to the Worthing Local Plan consultee database and will be notified at all subsequent stages of Local Plan progression.	No: please don't add me	
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In addition, if you would like to subscribe to the Worthing Planning Policy Newsletter	X
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(which covers a wide range of Planning Policy issues) then please put a cross in this box:	
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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. However, contact details will not be published. Unfortunately, we cannot accept or report confidential or anonymous responses. Further information about how personal information is processed can be found on the Council's website in the Planning Policy Privacy Notice: <https://www.adur-worthing.gov.uk/planning-policy/privacy-notice/> All data will be stored securely in line with the GDPR.

SECTION B – COMMENTS

As set out below, this consultation document is formed of four parts. It would be helpful if you provide your comments under the relevant sections together with relevant policy number, paragraph and page numbers. However, if your comments are more general then your comments can be inserted in the box below.

GENERAL COMMENTS

Please see enclosed letter from Horsham District Council.

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 1 - INTRODUCTION AND CONTEXT

(this 'part' includes characteristics of the borough/issues and challenges and vision & strategic objectives)

PART 2 - SPATIAL STRATEGY

(this 'part' sets out the proposed spatial strategy (what development and where) and the policies to deliver it)

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 3 - DEVELOPMENT SITES

(this 'part' includes details of the proposed future development sites)

PART 4 CORE POLICIES - HOMES AND NEIGHBOURHOODS **(Policies CPI – CP6)**

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Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 4 CORE POLICIES – SUSTAINABLE COMMUNITIES (Policies CP7 – CPI0)

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PART 4 CORE POLICIES – LOCAL ECONOMY

(Policies CPI1 – CPI4)

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

**PART 4 CORE POLICIES – HISTORIC ENVIRONMENT
(Policies CPI5 – CPI6)**

**PART 4 CORE POLICIES – ENVIRONMENT AND CLIMATE CHANGE
(Policies CP17 – CP23)**

This box is a fixed size - please continue on separate sheet(s) at the end if necessary

**PART 4 CORE POLICIES – TRANSPORT AND CONNECTIVITY
(Policies CP24 – CP25)**

This box will grow to allow you to add extra comments

**Additional comments continuation sheet(s) -
please mark clearly which section your comments carry on from**

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	Pat & Barry Blackham
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General comments

We write to Worthing Council in support for keeping Brooklands (SP5 & 6-LP pages 25-37) as a green gap.

We also write to Worthing Council in support of Goring Gap South and Goring Gap North (known as Chatsmore Farm) (SP5 & SP6-LP pages 25-37) to remain as Local Green Space and a strategic gap between Goring and Ferring.

THE WORTHING SOCIETY RESPONSE TO THE DRAFT LOCAL PLAN 2018

PART 1 INTRODUCTION AND CONTEXT

The Worthing Society welcomes the opportunity to contribute to the Consultation process for the Draft Worthing Local Plan. This plan will be the most important strategic policy document in shaping the town's future development for the next 15 years. The Local Plan Policies present a significant opportunity to ensure all aspects of the town's character are protected whilst encouraging ongoing good quality sustainable growth.

The Society which was formed in 1982, celebrates 36 years of safeguarding and preserving the town's unique built heritage. We also act as 'a watchdog' over the quality of new development schemes and regularly review plans affecting heritage buildings or conservation areas. Whilst we appreciate regeneration is vital to provide homes, amenities and economic security, we consider new development should complement the town's distinctive unique historic environment.

The following comments reflect the views of the Worthing Society Committee who have considered the Draft Local Plan in great depth. I hope our comments will make a positive contribution to the consultation process.

PART 2 SPATIAL STRATEGY

We support the Strategic Objective SO 18 (Page 14) which states:

'Protect maintain and enhance the distinctive character heritage and setting of the borough.'

This is a good basis on which to build the spatial strategy of the new Local Plan. Worthing has an extensive 'heritage map' including 26 Conservation Areas, over 360 listed buildings and one thousand buildings listed as being of local interest. The traditional seafront also forms a major part of the town's identity with a distinctive Regency and Victorian character, creating a positive effect on the local economy. There are important opportunities for development of both the town centre, flowing through to the seafront area, but the challenge will be how change is managed in this unique heritage environment. We note Policy SO 16 of the draft seeks to:

'Improve the quality of the natural environment and public realm within the town and along the seafront.'

The Society also accepts that the geographical setting of Worthing with the protected South Downs National Park (SDNP) forming the northern boundary and the sea to the south limits the amount of land available to meet housing targets, presenting a considerable challenge. Nevertheless this challenge should not override the need to protect Worthing's highly valued open green spaces for this and future generations. The Society supports Strategic Objective SO15:

'Protect and where possible enhance valued green spaces, stretches of undeveloped coastline gaps between settlements and the quality of the natural environment.'

Furthermore we appreciate the significant emphasis on regenerating and taking advantage of the opportunity to redevelop various key sites (brownfield sites) and 'areas of change' as they become

available. This should balance development alleviating the pressure on more sensitive heritage sites and these valued green spaces.

PART 3 DEVELOPMENT SITES

Following examination of the proposed sites and categories our observations are as follows:

1.PROTECTED AREAS: POLICY FOR THE COUNTRYSIDE

The Society particularly welcomes and fully supports the Council's proposal to protect the following sites through Local Green Space designation :

A Goring-Ferring Gap

B Chatsmore Farm

C Brooklands Recreation Area

These three areas are of significant local character offering beauty, important views and recreation in relatively built up areas. The Goring-Ferring Gap has important historical connections to Grade II Listed Goring Hall bordered by Ilex Avenue . Chatsmore Farm contributes to the 'setting' of the South Downs National Park and the Highdown Conservation Areas. Brooklands Park offers important leisure facilities for local communities in a tranquil setting within the urban area.

We note these areas have been assessed by a Landscape Consultant on behalf of Worthing Borough Council to determine their potential for Local Green Space designation in (2018) and were found to fully meet the necessary National Planning Policy Criteria (NPPF criteria) . The Society understands that land designated as Local Green Space is 'subject to the same strong development restrictions as Green Belt land.' These green spaces are an irreplaceable resource, so in our view fully merit this designation.

The Goring Residents Association and the Ilex Conservation Group (supported by the Ferring Conservation Group and Parish Council) submitted the request to designate the land as Local Green space. The Local Plan also states a considerable number of respondents to the 2016 ' Issues and Options Consultation' supported the protection of these green spaces within the Local Plan. This demonstrates how highly valued these areas are by local residents.

Relevant Policies: Local Green Gap (SP5) + Local Green Space (SP6) Pages (25-37) refer plus SO 15 and the NPPF.

2.ALLOCATIONS:

The Worthing Society is broadly supportive of the sites in this category. Redevelopment of previously used key sites (brownfield sites) is desirable, relieving pressure on more 'sensitive' areas. However, for the following reasons, we consider development of the following site A1 should be precluded:

SITE A1 CARAVAN CLUB Site: (Page 44): The Society objects to the inclusion of this site for proposed development for the following reasons:

*The site offers a green 'peaceful oasis' and is outside the identified 'Built Up Area Boundary.'

*Titnore Woods Local Wildlife Site also borders this countryside site to the north and west, and there are views of the SDNP.

*The land is prone to flooding and is located close to Titnore lake on the north east of the site.

*The Caravan Club is a well run and well used amenity for Worthing. To build an estate of 75 residential units immediately adjacent to the club site would destroy its tranquillity and appeal to caravanners.

Further observations on the large-scale selected sites in this category are as follows:

TEVILLE GATE Site: A5 (Page 52). The regeneration of this derelict site is welcomed with the opportunity to deliver a high quality mixed use 'landmark' development with links to the town centre. The following points are relevant considerations:

* Height, size and mass to complement the surrounding area will be a relevant consideration

* the development should not 'harm' the setting of the GII Listed Grand Victorian Hotel and the original Worthing Railway Station. Policies CP15 and CP16 plus NPPF refer

UNION PLACE Site : A6 (Page 54). CP5 is particularly relevant to the proposed mixed use site which is close to the Chapel Road Conservation Area, opposite a Grade II Listed Building and adjacent to the locally listed Connaught Theatre. Policies CP15 and CP16 plus the NPPF refer.

GRAFTON CAR PARK Site: A7 (Page56). Seafront redevelopment (mixed leisure/retail/residential) . A sensitive site with potential major impact on the setting of Worthing's much valued traditional seafront, the character of which is desirable to retain. Close scrutiny needed in line with Policies CP5, CP15 and CP 16 plus NPPF and SO15 and SO16

AREAS OF CHANGE

The Society considers these areas to have been well selected and ripe for regeneration during the life of the Local Plan. Policies CP5 and CP 4.53 will be relevant during the later development process.

Our only comments relate to the Stagecoach site which falls within the South Street Conservation Area as follows:

AOC3 (Page64) Stagecoach Site, Marine Parade.

*The historic Library Place, previously a 'Public Right of Way' runs north-south through the bus yard connecting the seafront to Stanford Square and the Grade II Listed building (Pizza Express) with connections to Jane Austen

* Library Place is an historic right of way, featured on the Hyde Map circa 1820. A 'Stopping-Up Order' was issued several years ago for 'health and safety' reasons due to the frequency of bus movements. When redevelopment occurs we suggest an application be made by the Council to revoke the Stopping Up order to restore this historic right of way.

* That consideration be given to extending the site boundary to encompass the parking areas running north /south on the east side of Bedford Row to potentially reinstate the historic garden area opposite the early Grade II Listed terrace. If achievable a public garden could be laid out enhancing the Conservation Area

Draft Policies CP16, national policies: NPPF and the (Planning) Listed Buildings and Conservation Areas Act 1990 are relevant.

OMMISSION SITES: we appreciate the pressure on housing targets but remain concerned about the selection of sites on the edge of the 'Built up Boundary' with the potential to begin erosion of the valuable countryside. We are strongly opposed to the inclusion of the following site being identified for potential longer term development for the following reasons:

OS1 Land East of Titnore Lane Page (72):

- * These two fields form an environmentally sensitive site being adjacent to the SDNPA and bordered by ancient woodland and should be protected: Paras 109-125 of the NPPF refer.
- * The development could harm the setting of the SDNP, Para 115 of the NPPF refers
- * The proposed intensive layout for 126 dwellings would be harmful to the natural environment
- * Ancient Woodland within and surrounding the site is part of the Titnore and Goring Woods complex Local Wildlife Site
- * Strategic Objectives SO15 and SO16 are a relevant consideration.
- * This area is prone to groundwater flooding and access is difficult

The fact that this site was previously excluded from the West Durrington development due to 'environmental sensitivity' indicates that the constraints here are serious. The Council's Landscape Consultant concluded the scheme would compromise the integrity of the internal ancient woodland and hedgerow 'buffer' running across the site. Combined with this advice, the guidance from Natural England and the NPPF, the Draft local Plan should in our view be amended to recognise this site as being permanently excluded from development. Our natural environment is an irreplaceable resource.

PART 4 DRAFT LOCAL PLAN CORE POLICIES
CORE POLICIES HISTORIC ENVIRONMENT-Page 132-13
POLICIES CP15 and CP16 refer.

Designated Heritage Assets.

The Worthing Society welcomes the robust approach of Policies CP15 and CP 16 to support and protect our Historic Environment which is an irreplaceable resource. These proposed Local Plan Policies appear stronger than those in the current Core Strategy and will further complement the National Planning Policy Framework and Planning Policy Guidance. We support in particular Local Plan Core Policy16 para 4.210 (page 137):

'...It is vital that the historic character of the built and natural environment is taken into account in the design of new development whether it is directly or indirectly affected.'

Our Designated and Non Designated Heritage assets give Worthing its unique character and sense of place, contributing positively to the town's economy. Therefore it is vital that clearly defined policies are defined within the Draft Local Plan giving guidance to Planning Committees, owners, developers and local heritage groups. This guidance is paramount when planning applications are submitted which affect Worthing's heritage assets. This guidance should be readily available on the Worthing Borough Council website.

The Society further supports the Policies CP1 6a,b,c and d in protecting our Designated Heritage Assets and Undesignated Heritage Assets from harmful development but ensuring good quality design and the use of appropriate materials where work is necessary.

The Society's Listed Buildings and Conservation Area Sub-Committee (LCAS) regularly review matters affecting our heritage assets. We consider that Policies CP15 and CP16 can be further strengthened by amendments in two specific areas:

- *1. Managing the Local Interest List -undesignated heritage assets

- * 2. A commitment to adequately resource the management of Worthing's Conservation Areas :

1). AMENDMENT TO THE LOCAL INTEREST LIST-Undesignated Heritage Assets -CP15 and CP16 .

Historic England advise that these undesignated heritage assets have been identified for their architectural design features ,interest and contribution to Worthing's unique historic environment. We consider therefore that the Local Interest List should in future be given a higher profile and recorded within Worthing's ' Historic Environment Record.' Local lists reinforce a sense of local character, identity and distinctiveness. Historic England also recommend involving communities with a role in nominating assets for addition to the Local List to increase involvement in supporting the heritage environment.

Our Listed Buildings and Conservation Areas Sub-Committee (LCAS) regularly review matters affecting the town's heritage assets. Significantly the Historic England Designation Officer has advised LCAS that the majority of Worthing's buildings which would satisfy the stringent tests for Statutory Listing have already been designated. Therefore the Local Interest List assumes greater importance both now and in the future as a 'tool' for protecting Worthing's non-designated heritage assets.

To provide adequate protection for undesignated heritage assets, the Local Interest List must be fit for purpose, accurate and readily accessible. At present there are two concurrent lists causing significant confusion and possible inaccuracies. We would like to propose the following amendments to the Draft Local Plan to increase the effectiveness of the Policies CP15 and CP16:-

- *Review the constituents of the WBC Local List, in particular those on the Supplementary List

- *Amalgamation of the Local List and Supplementary List (Saville Jones Survey: Buildings Architectural interest).

- * Clear process for submitting new applications for the Local List

- * Consider community involvement in nominating heritage assets for inclusion

- * Easily accessible information on the criteria for selection.

- * Improved online and comprehensive public access to the Local List.

- * Ensure Planning Committees fully appreciate the significance of the Local List.
- * The NPPF requires the Local Interest List to be taken into account as a material consideration when determining the outcome of a planning application involving a Locally Listed heritage asset
- * A regular annual review of the performance of the Local Interest List.
- * To provide adequate resources and ongoing staff time to support the Local List.
- * A commitment to include this amendment in the body of the Draft Local Plan

2). AMENDMENT - MANAGEMENT OF CONSERVATION AREAS-CP16e

There are 26 conservation areas contributing significantly to the backdrop of Worthing's Historic Environment. The Society supports Policy16e requiring high quality development preserving important feature within these important areas. In addition we welcome the proposal to carry out the long overdue Conservation Area Review, updating the Appraisal Documents, (CAAD).

This is a vital exercise as the CAAD's referred to in planning meetings or letters of objection are 10 years out of date. A structured Conservation Area Review is urgently required. These documents are an important tool in protecting the conservation areas and defining opportunities for sensitive improvement. The following amendments to the Local Plan are therefore proposed to further support Policies CP 15 and CP16:

- * Clear process for applying to designate new conservation areas such as the Marine Gardens area and surrounding street layout,
- * Commitment to giving the Conservation Officer adequate staff resources for the Appraisal Review and ongoing management of the areas.
- * Ensure the Planning Enforcement Team is adequately resourced to pursue Article 4 Directives where needed, inappropriate development and Section 215 Notices to protect heritage assets from falling into disrepair.

QUALITY OF THE BUILT ENVIRONMENT CORE POLICY CP5

The Worthing Society considers Local Plan Policy CP5 and SO18 provide a comprehensive strategy to ensure all new development is of good design complementing the surrounding areas. This is supported by CP15 and 16 acknowledging the importance of protecting Worthing's heritage assets. Attention to design, height, size and mass will be particularly relevant with the major developments likely to be submitted for approval in 2019.

Equally important is the sensitive integration of new development covered by SO6. We support PolicyCP5 4.60 to ensure that when development is necessary the 'most effective use of land is

positively encouraged’ and must not result in ‘losing important green space.’ The policies we have referred to show overall a positive way forward.

In addition we consider there are two further opportunities to strengthen the Local Plan Policies CP 5, CP16 and CP20. These possible amendments relate to Worthing’s seafront and green infrastructure:

1.WORTHING SEAFRONT: Policies CP and CP15 give very little specific detail about the seafront, a major heritage asset and only states:

*‘Improve the quality of the natural environment and public realm within the town centre and along the seafront ‘

By contrast we note, the Saved Policies of The Worthing Local Plan 2003 CT3 (paras 4.5 and 4.6) gives more defined guidance when referring to the criteria for development referring to:

* ‘ the importance of respecting and enhancing the character of the seafront area and is that it is appropriate in terms of scale massing, height layout and in relation to adjoining buildings’.

The seafront is a major heritage asset for Worthing and many visitors and tourists identify with its traditional Regency /Victorian style. Whilst appropriate development is desirable great care must be taken so as not to harm the character of this important area. We suggest therefore that Draft Local Plan Policy 15 is strengthened to give more defined protection to this unique area .

PART 4 CORE POLICY 20 GREEN INFRASTRUCTURE CORE POLICY

*Our open green spaces are an important amenity and social benefit to local communities. The Society is keen to see the implementation of a Green Infrastructure Strategy. Worthing has a considerable number of preserved trees, woodland, parks and open spaces. Ilex Avenue and Titnore Woods are significant examples.

* There are also pockets of countryside bordering the Built Up Area Boundary preventing coalescence. Some areas have close proximity to the SDNP. These areas should be assessed.

* There are important green areas within conservation areas and generally within the town centre.

In accordance with the NPPF it is important to achieve a definitive layout to clarify the status of these green spaces and preclude inappropriate development by producing a readily accessible Green Infrastructure Map for planners, developers and residents.

We consider that overall the Local Plan Policies we have referred to offer a very positive way forward for the built environment and public realm particularly if the amendments we have referred to can be incorporated. .

PART 4 CORE POLICY CP13 – THE VISITOR ECONOMY

Although somewhat outside our remit, The Society would welcome an overarching policy framework ambitious in progressing the further development of Worthing’s key tourist industry

*Policy Section CP13- The Visitor Economy includes CP3a and CP13b. Although broadly supportive of existing visitor attractions and providing facilities, the policies overall are quite neutral. They do

not in our view maximise the potential of promoting Worthing's character and seafront experience for both residents and visitors. An ambitious strategy would add to a healthy economy. Here are our observations and suggestions:

- * To further highlight the display of collections at Worthing Museum and consider specific arts and literary events .
 - *. A 'Dedicated Tourist Office' situated in a highly visible seafront location would contribute positively to the economy and provide linked information to other venues such as the museum.
 - * The Tourist Office would give be focal point in highlighting Worthing's unique facilities in a coordinated way, enhancing the visitor experience. The town has a great deal to offer with a vibrant arts community, theatre venues and lively restaurant quarter.
 - * The Blue Plaque Heritage Trail, Town Trails and the Crumbs Coastline Trail for younger families contribute positively to experiencing and enjoying the heritage environment. They could be displayed and advertised more effectively in a dedicated, manned Tourist Office.
 - * The Worthing Society together with WBC is devising a dedicated Town Centre Trail particularly for tourists featuring historical figures such as Jane Austen and Harold Pinter. Whilst exploring the trails families are likely to visit restaurants and coffee shops.
-

PART 4 CORE POLICIES -TRANSPORT AND CONNECTIVITY CP24

The Worthing Society Committee want to ensure that the proposals of the Draft Local Plan include the well-being and inclusion of all sections of the community. People want to feel safer in their homes and within the town. They particularly want their children to feel safe and we consider the following points would contribute to achieving this:

- Safe affordable and reliable public transport is a way of achieving this and is one of the aims in CP24
 - Ideally transport should run later in the evening.
-

GENERAL COMMENTS ABOUT WIDER ASPECTS OF THE PLAN

1.Sustainable Communities

Unfortunately 'green' open spaces such as parks and sports facilities are currently not as safe as we would like. Ideally, the presence of uniformed, patrolling 'park keepers' would help people (especially children} to feel secure. Sadly we suspect that the current 'economic climate' rules this out.

2. Involving Young People in The Worthing Local Plan

This is a very important issue, yet we are not aware that the opinion of the town's younger inhabitants has been sought. If not, as this 15-year plan we suggest that all local secondary and colleges students of around 13 years of age and over should be invited to take part in an appropriate survey regarding these issues (tailored to be relevant to that age group) as they will certainly be

greatly affected by its conclusions. NB-even the younger participants will be around 28 years of age by year 15 of the plan.

We suggest for instance that they be asked what additional or improved sports facilities they would like to see in Worthing and, very importantly to them, what other social/leisure facilities are felt to be currently lacking within their price range. These should encompass safe 'coffee bars'; snack fast food venues selling healthy food : 'youth clubs' etc. It goes without saying that all venues should be safe and affordable places.

CONCLUSION

The Worthing Society Committee highlighted this paragraph from the Local Plan document:

'By 2033 we will be recognised as a highly desirable place to live work and visit, continuing to attract high calibre business and significant inward competitiveness.'

We consider the town is already a desirable place to live with a distinctive character supporting a vibrant artistic community. The challenge in our view is how to build on these very positive assets whilst respecting the historic environment and coping with the geographical land constraints. The Draft Local Plan represents a significant step forward to achieving these aims and avoiding the planning mistakes of the past.

Susan Belton

Worthing Society Chairman

11th December 2018

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

REFERENCE

DWLP-M -79

Date received: 12/12/2018



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

11/12/2018

Dear Sir/ Madam

Response by the House Builders Federation to the Draft Worthing Local Plan

Thank you for consulting the Home Builders Federation (HBF) on the Draft Local Plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

Plan period

We note that the plan period starts in 2016. This start date is not in conformity with national policy and guidance. Paragraph 2a-004 of PPG states that the baseline for the calculation of the standard methodology is the current year. Given that the uplift for affordability applied in step two of the standard method seeks to address the affordability concern created due to poor delivery in previous years logic dictates that the start date for the plan should start from the same period. We would therefore suggest for the purposes of soundness that the Plan period is adjusted to the year in which the plan is submitted. Alongside this it is important to note that Paragraph 22 of the NPPF states that the Council should seek to prepare a plan that looks ahead for a minimum of 15 years. If the plan is to be submitted and examined in 2019 the plan should therefore, as a minimum, be extended to 2034 to be consistent with national policy.

Housing needs and supply

The Local Plan and Housing Implementation Strategy state that the housing needs using the standard methodology is 753 dwellings per annum (dpa), which gives a total for the plan period of 12,801 homes. In arriving at this figure, the Council used the 2016 based household projections, however, it looks likely that this dataset will not form the basis of the standard methodology and the Council will need to revert to use of the 2014 projections. Using these projections would require the Council ensure the delivery of 865 dpa if the are to provide the necessary uplift in housing delivery that is will address the growing affordability concerns in Worthing.

With regard to the supply of homes to meet this need the Local Plan outlines that it will not be possible to deliver the number of homes requires to meet the figure established



in using the standard methodology. The Plan cites a range of physical and environmental constraints that will prevent the Council from meeting this target and lead to only 4,182 new homes being delivered in the Borough, less than half of the homes that the Government considered to be required to meet needs and improve affordability in Worthing.

In considering the soundness of the Council's decision not to meet needs we appreciate that Worthing is constrained by the national park to the north and the coast to the south. Alongside this the Borough's boundary is drawn relatively tight of the urban edge and as such the opportunities for further development are more constrained than in many other Boroughs. As such it will be essential that the Council ensures that any homes that are not delivered in this Local Plan are delivered elsewhere. This is a fact that is recognised by the Council but at present there is no evidence to show where these homes will be delivered. All co-operation would appear to have achieved at present is agreement on the cross boundary and strategic concerns but with very little progress as to the solutions. Paragraph 61-007 of PPG outlines the expected activities that need to be documented and this includes the preparation of strategic policies in relation to the delivery of unmet housing needs. It will therefore be essential that such policies are prepared in partnership with neighbouring authorities to identify how development in the area can be substantially increased.

SP5 - Local Green Gaps

One such area where the Council will need to work in co-operation with its neighbours is how it can increase development between those settlements along the coast. Give the other constraints faced by the Council it seems contradictory that they should then seek to limit opportunities even further by the inclusion of policy SP5. By including green gaps around Worthing with the aim of preventing coalescence the Council are in effect creating a Green belt around Worthing and its neighbouring settlements. This is not consistent with national policy, even more so considering the Council's inability to meet housing needs.

The Government have established in foot note 6 of paragraph 11 those parts of the framework that may prevent an authority from meeting needs. This footnote does not include green gaps and we would suggest that consideration needs to be given as to the allocation of land in these locations could help to meet needs. As such we consider this policy not to be consistent with national policy and it must be deleted. In steads the Council should work with its neighbouring authorities to see how they could deliver development jointly in these areas rather than placing a further constraint on development in their local plans.

SP6 – Local green Space

In designating local Green Space, it is important to ensure that they conform the paragraph 100 of the NPPF. IN particular we are concerned that the Council is seeking to designate extensive tracts of land in order to prevent development rather than to

protect demonstrably special local green spaces that have a particular local significance. The NPPF is clear that these should not be extensive tracts of land and each of the areas designated in this policy could be considered as extensive tracts of land. We therefore consider that this policy should be deleted as the land designated as Local Green Space to be inconsistent with requirements set out in paragraph 100 of the NPPF.

CP1 – Housing mix

Housing mix

Part a) of the policy does not provide the necessary flexibility to for site sot respond to the market. The Council's evidence as established in the SHMA provides a snapshot in time of needs for the Borough as a whole. The Council should look to ensure this broad level of mix I achieved but it must also recognise that different sites in different areas will be seeking meet more specific needs and demands. It is therefore important to allow the developer to define the mix of development on that site with regard to the broad evidence of need but without the expectation that the mix should be reflected. We would therefore suggest that part a) is amended as follows:

"In order to deliver sustainable, mixed and balanced communities, the Council will expect all applications for new housing ~~housing developments (both market and affordable)~~ to ~~incorporate a range of dwelling types, tenures and sizes~~ that reflect and respond to consider the most up-to-date evidence of housing needs and demands."

Adaptable homes

This policy requires all of new affordable and market housing on schemes of more than ten dwellings to meet Building Regulations requirement M4(2) for accessible and adaptable homes. The HBF is supportive of providing homes for older and disabled persons, however, it is essential that where local plans seek to apply the optional technical standards they are fully justified. This situation was clearly established in the Written Ministerial Statement dated 25th March 2015 which stated that '*the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG*'. Therefore, if the Council wishes to adopt the higher optional standards for accessible and adaptable homes the Council should only do so by applying the criteria set out in the PPG.

PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for Worthing which justifies the inclusion of optional higher standards for accessible and adaptable homes.

However, the HBF does not consider that there is a justification for all homes to be built to part M4(2) and 10% to Part M4(3). We could not find sufficient evidence to support part c of this policy and as such suggest that it be deleted. With regard to M4(2) we recognise that there is an ageing population within the Borough. However, given that this is the same for all Boroughs across the Country this cannot be considered sufficient to require all new homes to be built to this standard. If it were the Government would not have made this an optional technical standard. We would suggest that a more appropriate way of meeting the needs of older people is by identifying specific opportunities to meet the needs of the ageing population rather than hoping to meet needs through the optional technical standards.

We would also suggest that part b of this policy be deleted as it does not serve a clear purpose as is required of policies under paragraph 16 of the NPPF.

CP3 – Affordable housing

We could find no up to date viability evidence to support the approach to affordable housing set out in this policy. The 2018 NPPF places more weight on ensuring that the viability of development is established at the plan making stage. There is clear drive by Government to have less negotiation on a site by site basis in relation to affordable housing and as such policies must not be set at the margins of viability and allow for a greater degree of uncertainty with regard to the cost of delivering new development. Council's will need to ensure that the majority of development will not be made unviable by the cumulative impact of the policies in the local plan. Without a viability study we therefore cannot state whether this will be the case for Worthing. Given the approach to the viability of local plans set out in paragraph 57 of the NPPF we would suggest that the Council carefully considers its viability evidence and whether or not this is reflected by its policies in the local plan.

Part d of this policy should be deleted. The distribution of the affordable housing on a site and its appearance should not be dictated by the Council. Given that the return from an affordable unit is significantly less than from the market housing it's the appearance may well differ from that of the market housing being provided. Indeed, on some sites the developer of those homes may well differ if a site is being developed in partnership with a registered provider. We do not consider there to be any justification for this policy.

Conclusion

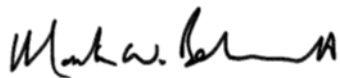
At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF, in the following key areas:

- Plan period is inconsistent with national policy
- The plan does not meet housing needs and has not identified using the duty to co-operate how these needs will be met;
- Restricts potential for development through the inappropriate designation of local green gaps and local green space.
- Policy on housing mix does not offer sufficient flexibility

- Insufficient evidence to support the requirement for all homes to be built to part M4(2) and 10% to part M4(3);
- Until an up to date viability assessment has been published it is not possible to consider the affordable housing policy to be justified.

We hope these representations are of assistance in taking the plan forward to the next stage of plan preparation and examination. I would also like to express my interest in attending any relevant hearing sessions at the Examination in Public. Should you require any further clarification on the issues raised in this representation please contact me.

Yours faithfully



Mark Behrendt MRTPI
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Date: 11 December 2018

Tel: 01903 221389

REFERENCE

DWLP-M -80

Date received:
12/12/2018

Re: **Draft Worthing Local Plan Regulation 18 Consultation (October 2018)**

Dear Sir/Madam,

This representation to the Draft Worthing Local Plan Regulation 18 Consultation is made by Worthing Borough Council's Major Projects and Investment Team, in conjunction with London & Continental Railways Ltd. ('LCR'). For context, LCR is a Department for Transport ('DfT') owned property and regeneration company that has been managing, developing and disposing of property assets for over 20 years. LCR has a Government remit to deliver homes, jobs and economic growth, and has been working closely with Worthing Borough Council ('WBC') to consider development options for the Union Place site.

Background

Union Place has previously been considered as part of the Worthing Investment Prospectus, which following a high-level site analysis concluded that the 1.3ha (3.21 acre) site had the potential to accommodate c.200 new homes and c.9,500 sqm (c.102,257 sq ft) retail and leisure space. It should be noted that this work considered a wider area than the land proposed for allocation in the Draft Local Plan (site A6).

The Investment Prospectus specifically acknowledges the potential to assemble a larger site through the inclusion of the adjacent Union Place surface car park to the west (which currently does not benefit from a draft allocation) which in the longer-term would enable a comprehensive development of the site.

The Growth Deal 2017 – 2022 agreed by WBC and West Sussex County Council sets out a joint commitment to align resources to deliver sustainable growth and unlock opportunities for new homes, new commercial and leisure floorspace. Union Place has been identified as a key development site within this agreement.

Following agreement at Joint Strategic Committee (JSC) in April 2018, WBC and LCR have been working together to understand site constraints at Union Place, and to work up and test, a range of development options for the site. WBC and LCR have entered into a land-pool agreement, under which LCR has acquired the freehold interest of the High Street surface car park from WBC, thereby giving it a minority interest in the site. At JSC on 6 November 2018 a development strategy was agreed which will now enable the preparation of a planning application for Union Place.

The following sections provide our initial comments on the Draft Local Plan.

General Comments

Policy CPI4 defines the approach to retail frontages that will be taken forward in the Draft Local Plan. Paragraph 4.184, together with the accompanying table on page 127, set out the proposed amendments to the town centre's Primary Shopping Area. One significant change is the proposal to create a new "Secondary Zone B" ('SZB') that will include the Connaught Theatre and Cinema, recognising its role as a 'main town centre use'.

The Policy emphasis supports the application of a more flexible policy approach that is generally permissive of all A-use class uses within the SZB, alongside other appropriate leisure uses. We fully support this policy position as it is considered that this flexibility will be an important factor in achieving continued animation, vibrancy and vitality in this area. This relaxation is evidence based and recognises the general shift in the way that this area of the Town Centre is now being used. This shift away from retail towards leisure uses will be further reinforced and enhanced once the Union Place site is developed. Point G of the policy provides policy support for proposals that help develop and enhance the evening and night-time economy, and this is also supported. It is considered that Policy CPI4 provides a suitable policy basis to help support the future delivery of new development at Union Place, by supporting a dynamic and vibrant surrounding area.

Site Specific

The adopted Worthing Joint Core Strategy (2011) designates Union Place South as an "Area of Change". The designation includes the extent of WBC and LCR's interests, together with a much wider area extending to Ann Street at the south. As an Area of Change, the extant Core Strategy proposed a series of development principles which broadly comprised the creation of a new mixed-use quarter.

The Draft Local Plan seeks to move away from this broad designation approach, and instead formally allocates the corner of Union Place & High Street as site A6. This departure in approach from the adopted Core Strategy is supported insofar as it provides a greater degree of certainty through the inclusion of the site as a formal allocation with a defined boundary. However, it is considered that the boundary of the site should be adjusted to include in some form the Union Place surface car park to the west as a subsequent phase of development, thereby aligning with the boundary considered through the Worthing

Investment Prospectus (2016). Firstly, this approach would provide a greater degree of alignment between the evidence base documents and the Local Plan, whilst secondly this would provide a greater degree of support for the comprehensive masterplan approach and regeneration of the site that WBC Major Projects & Investment and LCR are advocating.

Policy A6 provides a series of development requirements that a future scheme will be required to take into account. The sixth bullet point sets a requirement for the development to manage 'Right of Light' implications appropriately. Whilst this general policy thrust is supported, it should be noted that Right to Light issues (including associated compensatory measures) are a civil matter and therefore outwith the planning system. Indeed, Right to Light is a separate issue to Daylight and Sunlight issues, which do fall within the vires of the planning system. It is therefore considered that this bullet point should be amended to state:

- "[...] manage ~~'Right of Light'~~ daylight and sunlight implications appropriately"

At bullet point eight the Draft Local Plan sets the requirement for development to provide a new electricity sub-station. Having reviewed the Council's Infrastructure Delivery Plan, it is not immediately clear where this requirement has come from. Whilst we do not object to the fact that a new electricity substation may be required, this requirement would be determined through pre-development enquiries with UKPN who will be able to appraise a potential scheme to determine whether or not a new electricity substation is in fact required to support the proposed development on the site. As such it is not considered that this is an issue best addressed through planning policy, rather it should be a requirement agreed between UKPN and the developer based upon the scheme's specific requirements at the point in time when the development is brought forward. This should therefore be reflected in the policy wording, and we would request that this formalised Policy requirement is removed.

We would also wish to clarify the assumptions which sit behind the Draft Local Plan's indicative capacity of 128 residential units and 2,390 sqm commercial and 3,088 sqm of leisure floorspace for the smaller 0.6ha proposed allocation site. This quantum of development should align with the assumptions underpinning Worthing Investment Prospectus which we understand was informed by concepts design produced by Allies & Morrison for WBC. Despite the Prospectus considering a larger site area, totalling some 1.3ha, the assessment showed that to achieve policy compliance, Union Place could only achieve c.200 residential units and c.9,500sqm of retail and leisure space. This difference in assumptions is further compounded by the October 2018 Draft Infrastructure Delivery Plan Part C, PDL sites – Town Centre Sites, which suggests that Union Place has a "realistic capacity" of 250 residential units, 6,000sqm of leisure and 2,322sqm of retail. Given the work that has already been undertaken to scenario test potential site capacity and underpin the Investment Prospectus, it is considered that the Local Plan assumptions should be amended to align with this work. This would have the added benefit of providing an

evidenced policy position that would justify the Council's assessment of realistic Town Centre site capacities at Examination. We consider that the plan should identify an indicative capacity of: 200 residential units, c.9,500 sqm (c.102,000 sq ft) retail and leisure space.

Conclusion

Overall, we are fully supportive of the Draft Local Plan. We would welcome the opportunity to undertake early engagement with the Planning Policy Team to discuss the points raised in this letter, ahead of the Council progressing towards Regulation 19 plan making stage. Given the shared interests of WBC and LCR on this site, continued engagement with the Policy Team will assist not only the regeneration of Union Place, but also support the overall production of the Local Plan.

Yours sincerely

Cian Cronin, Head of Major Projects & Investment, Worthing Borough Council

Ray Willis, Development Manager, London & Continental Railways Ltd

REFERENCE

DWLP-M -81

Date received: 12/12/2018

Carter Jonas

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Portland House
44 Richmond Road
Worthing
BN11 1HS

12 December 2018

Dear Sir/Madam

WORTHING BOROUGH COUNCIL DRAFT LOCAL PLAN CONSULTATION (REGULATION 18) OCTOBER 2018

I am writing on behalf of our Client Southern Gas Networks ('SGN') in respect of their landholding at Park Road, Worthing, BN11 2AN, a site plan is appended to this letter. SGN manages a gas network that distributes natural and green gas to approximately 5.8 million homes and businesses across Scotland and the South of England. Advances in technology and changes in gas provision across the country enables gas to be stored within the underground pipes, which makes the existing gasholder structures redundant. In 2013 SGN commenced a programme of decommissioning all of its gas holders, dismantling the existing gas infrastructure and redeveloping sites.

The 0.34ha site is located west of Park Road and comprises one gasholder and associated gas infrastructure. The gas holder has been decommissioned and is currently being dismantled and should be removed from site by January 2019. The site will then be ready for redevelopment.

Within the current Core Strategy (adopted 2011) the site is allocated as Area of Change 7 (British Gas Site, Lynhurst Road), for mixed-use residential-led development. This proposed use for the site has been reflected in the emerging Plan, within site allocation AOC2: British Gas Site, Lynhurst Road. However, allocation AOC2 includes the neighbouring NHS car park, increasing the site area to approximately 1.14ha and sets an indicative capacity of 85 residential units.

SGN considers the allocation for a mixed-use residential-led development to be acceptable for this site, as it aligns with uses in the surrounding area and suitable with this sustainable location. SGN further supports the approach of an 'indicative capacity', which will ensure that the development potential of the site is optimised and enable a design-led approach to be applied for future redevelopment.

The approach to optimise the development potential of this site aligns with the recently adopted NPPF (July 2018). Paragraph 118 states that all sites should make effective use of land and giving substantial weight to the value of using suitable brownfield land within settlements for homes.

Paragraph 123 also confirms that where there is an existing or anticipated shortage of land for meeting identified housing need. The latest annual monitoring report outlined that the District could only identify a 2.4 year housing supply, therefore it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that development will make optimal use of the potential for each site. We are satisfied that the approach taken to this site adopts the principles outlined in the NPPF.

Overall, SGN are supportive of the approach being taken by the Council in preparing its new Local Plan and proposed allocation AOC2, which will optimise the development potential of the current gasholder site at Park Road.

I trust you will find the above comments useful at this stage, however, should you require any additional information please do not hesitate to contact myself or my colleagues Alister Henderson (alister.henderson@carterjonas.co.uk) or Ruby Wilkinson (ruby.wilkinson@carterjonas.co.uk).

In the meantime, I would be grateful if you could continue to keep me informed of progress of the Local Plan.

Yours Faithfully

A handwritten signature in black ink, appearing to read 'Adam Conchie', is centered within a light gray rectangular box.

Adam Conchie

Associate

E: Adam.conchie@carterjonas.co.uk

T: 020 7529 1516

SITE PLAN



Office use Only:	
Comment number	
Date received	

Draft Local Plan for Worthing Consultation Document October 2018 Comments Form

**This consultation runs from Wednesday 31st October
 to 5pm on Wednesday 12th December 2018**

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


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

Phone: 01273 263000

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

Section A - Contact Details

First name	Adam		
Last name	Conchie		
Organisation	Carter Jonas, for and on behalf of Southern Gas Networks (SGN)		
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Address line 2	London		
Town			
Postcode	W1G 0BG	Telephone	020 7529 1516
Email address	adam.conchie@carterjonas.co.uk		

Name	Adam Conchie	Date	12.12.18
Signed			

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.

Note: Unless you request otherwise (by putting a cross in the box to the right), all respondents will be added to the Worthing Local Plan consultee database and will be notified at all subsequent stages of Local Plan progression.	No: please don't add me	
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In addition, if you would like to subscribe to the Worthing Planning Policy Newsletter (which covers a wide range of Planning Policy issues) then please put a cross in this box:	X
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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. However, contact details will not be published. Unfortunately, we cannot accept or report confidential or anonymous responses. Further information about how personal information is processed can be found on the Council's website in the Planning Policy Privacy Notice: <https://www.adur-worthing.gov.uk/planning-policy/privacy-notice/> All data will be stored securely in line with the GDPR.

SECTION B – COMMENTS

As set out below, this consultation document is formed of four parts. It would be helpful if you provide your comments under the relevant sections together with relevant policy number, paragraph and page numbers. However, if your comments are more general then your comments can be inserted in the box below.

GENERAL COMMENTS

Representations are made in respect of Site allocation AOC2: British Gas Site, Lynhurst Road, please see the submitted letter for further details.

This box is a fixed size - please continue on separate sheet(s) at the end if necessary

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 1 - INTRODUCTION AND CONTEXT

(this 'part' includes characteristics of the borough/issues and challenges and vision & strategic objectives)

Please refer to the submitted letter.

PART 2 - SPATIAL STRATEGY

(this 'part' sets out the proposed spatial strategy (what development and where) and the policies to deliver it)

Please refer to the submitted letter.

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 3 - DEVELOPMENT SITES

(this 'part' includes details of the proposed future development sites)

Representations are made in respect of Site allocation AOC2: British Gas Site, Lynhurst Road, please see the submitted letter for further details.

PART 4 CORE POLICIES - HOMES AND NEIGHBOURHOODS **(Policies CPI – CP6)**

Please refer to the submitted letter.

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

**PART 4 CORE POLICIES – SUSTAINABLE COMMUNITIES
(Policies CP7 – CP10)**

Please refer to the submitted letter.

**PART 4 CORE POLICIES – LOCAL ECONOMY
(Policies CP11 – CP14)**

Please refer to the submitted letter.

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

**PART 4 CORE POLICIES – HISTORIC ENVIRONMENT
(Policies CP15 – CP16)**

Please refer to the submitted letter.

**PART 4 CORE POLICIES – ENVIRONMENT AND CLIMATE CHANGE
(Policies CP17 – CP23)**

Please refer to the submitted letter.

This box is a fixed size - please continue on separate sheet(s) at the end if necessary

**PART 4 CORE POLICIES – TRANSPORT AND CONNECTIVITY
(Policies CP24 – CP25)**

Please refer to the submitted letter.

This box will grow to allow you to add extra comments

**Additional comments continuation sheet(s) -
please mark clearly which section your comments carry on from**

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Section A - Contact Details

First name	Adam		
Last name	Conchie		
Organisation	Carter Jonas, for and on behalf of Southern Gas Networks (SGN)		
Address line 1	One Chapel Place		
Address line 2	London		
Town			
Postcode	W1G 0BG	Telephone	020 7529 1516
Email address	adam.conchie@carterjonas.co.uk		

Name	Adam Conchie	Date	12.12.18
Signed			

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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GENERAL COMMENTS

Representations are made in respect of Site allocation AOC6: Martlets Way, please see the submitted letter for further details.

This box is a fixed size - please continue on separate sheet(s) at the end if necessary

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 1 - INTRODUCTION AND CONTEXT

(this 'part' includes characteristics of the borough/issues and challenges and vision & strategic objectives)

Please refer to the submitted letter.

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(this 'part' sets out the proposed spatial strategy (what development and where) and the policies to deliver it)

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Please refer to the submitted letter.

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(Policies CP7 – CP10)

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(Policies CP24 – CP25)**

Please refer to the submitted letter.

This box will grow to allow you to add extra comments

**Additional comments continuation sheet(s) -
please mark clearly which section your comments carry on from**

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

12 December 2018

Dear Sir/Madam

WORTHING BOROUGH COUNCIL DRAFT LOCAL PLAN CONSULTATION (REGULATION 18) OCTOBER 2018

I am writing on behalf of our Client Southern Gas Networks ('SGN') in respect of their landholding at the former gas holder site accessed off Barrington Road, a site plan is appended to this letter.

SGN manages a gas network that distributes natural and green gas to approximately 5.8 million homes and businesses across Scotland and the South of England. Advances in technology and changes in gas provision across the country enables gas to be stored within the underground pipes, which makes the existing gasholder structures redundant. In 2013 SGN commenced a programme of decommissioning all of its gas holders, dismantling the existing gas infrastructure and redeveloping sites.

The gas holder on this site has already been removed and the site is ready to be redeveloped.

Our client is currently in active discussions with the adjacent landowner (to the west) who owns the land to the rear of Martlets Way in the interests of bringing forward development at the earliest possible juncture. Evidently the outcome of these discussions cannot be definitively predicted. However, at this stage it is envisaged that the two sites will come forward either as a comprehensive development, or as part of a phased, complementary set of proposals.

Within the latest draft of the Local Plan, currently out to consultation, our client's site is included within Policy AOC6, alongside the aforementioned neighbouring land to the rear of Martlets Way.

Our client supports the development requirements set out in this policy, in particular:

- Providing mixed-use development of employment and residential uses;
- Ensuring that the layout and access arrangement for any development does not constrain or prevent the ability of development to come forward elsewhere within the site as a whole, and
- Considering the potential for a comprehensive redevelopment with AOC5 to the east of the site.

However, as it is currently drafted, the policy is unsound in terms of the identified indicative capacity of development, as:

- It does not include residential development, and
- The level of employment floorspace is too high.

The indicative capacity should be amended to increase the commitment of residential development and lower the level of employment to reflect that employment development on the site is only viable if brought forward with a substantially larger quantum of residential development. Further:

- The District has an acute shortage of housing land, reflected in the fact that in its latest published annual monitoring report only a 2.4 year housing supply is identified;
- The site, located close to local centres and Durrington railway station, is in a highly sustainable location for high-density residential development, and
- High-density residential development offers the best opportunities to provide the maximum level of affordable housing.

Further, the policy should be amended to make it clear that employment generating uses, beyond those falling in B Class uses will be supported on the site, for example care home facilities. This is necessary to reflect:

- The lack of viability of B class uses in the current market;
- Due to changes in the demography and the economy, recognition that employment growth is increasingly being focussed within non B class uses, and
- That non B class uses often have the capacity for generating more jobs, for example a Class C2 care home in comparison to a Class B8 warehouse.

Finally, whilst writing, it should be noted that our client and EM Goring are also in active negotiations with the promoter of the adjacent former HMRC site (allocated for development by draft policy AOC5) in the interests of promoting a comprehensive solution relative to the three sites. It is considered that, if developed comprehensively, the three sites could deliver a substantially higher level of residential development than would be possible if they were developed separately. Correspondingly, a larger quantum of residential development not only offers the potential to deliver higher levels of affordable housing, but could also support a much larger amount of employment floorspace than would otherwise be the case.

I trust you will find the above comments useful at this stage, however, should you require any additional information please do not hesitate to contact myself or my colleagues Alister Henderson (alister.henderson@carterjonas.co.uk) or Ruby Wilkinson (ruby.wilkinson@carterjonas.co.uk).

In the meantime, I would be grateful if you could continue to keep me informed of progress of the Local Plan.

Yours Faithfully



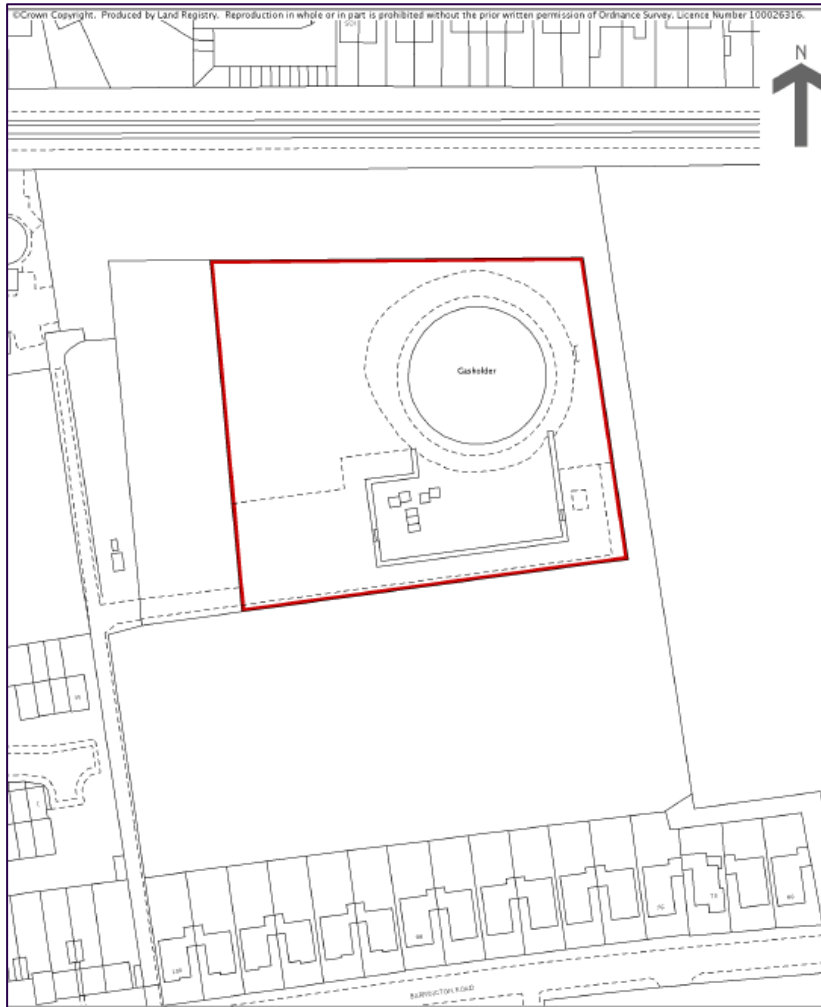
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SITE PLAN



WBC Draft Local Plan 2018-2033 Consultation - Response from The A&W Green Space & Positive Public Health Group

REFERENCE

Re: Proposed sites - fully in support of retaining protected areas below.

- Protected Areas: - Goring Gap, Chatsmore Farm, Brooklands

DWLP-M -82

Re: Sustainable Communities - Fully support the Local Plan proposals.

Date received:
12/12/2018

- Full support for Health Impact Assessments for development proposals with reference to research within the **2016 WHO Urban Green Spaces and Health Report**. http://www.euro.who.int/_data/assets/pdf_file/0005/321971/Urban-green-spaces-and-health-review-evidence.pdf?ua=1
- The report summarises the available evidence of beneficial effects of urban green spaces on, for instance:-
 - Improved mental health and cognitive function
 - Reduced cardiovascular morbidity and mortality
 - Reduced obesity and risk of Type 2 diabetes
- The research conclusions and highlights were considered in relation to Adur and Worthing Councils in the **A&W Green Spaces and Positive Public Health Report of November 2017** produced by a cross-departmental officer working group as part of the last public health strategy work plan. Full document as separate attachment.
- Full support for CP7 Reduction in health inequalities through greening of urban spaces and existing and new development at design stage. Encourage landscaping schemes at the design stage - advice from lessons learnt at Highdown gardens?
- Ensure research on improved mental health and cognitive function is included within planning policy to ensure new developments and redevelopments are designed in such a way as to promote walking and stress reduction outcomes as the norm.
- With reference to the Open Space Strategy, do all wards currently meet the minimum standard for provision of open space? Do all residents have walking access to a green space within 15 minutes?
- Also consider private green spaces - garden provision - lessons learnt - green v driveway. Supportive guidance via local policy?
- Create more 'pocket parks' for deprived areas.
- Encouraging safe active travel, improved mental health and requiring attractive environments within developments, incorporating high quality green space.
- Consider orientation of buildings early on, to protect these amenity areas from noise and air pollution from roads. Maximise distance between receptor and source or use barriers/orientation within design principles. There are proven mental health benefits from obscuring the source of pollution (noise and air) ie if the source is unseen, the brain tends not to register the source eg traffic.
- Refer to the Air Quality and Emission Mitigation Guidance for Sussex 2013:- <https://www.adur-worthing.gov.uk/environmental-health/pollution/air-quality-and-pollution/air-quality-and-planning/> and the Planning Noise Advice Document for Sussex Local Authorities 2015:- <https://www.adur-worthing.gov.uk/noise/planning/>
- CP8 Open space - look at Council owned land - overwhelming evidence of the benefits of green space and positive public health. Recommend signposting to green

spaces and pocket parks. Create 'serene' areas in green spaces aimed specifically for people to have peace and quiet.

Re:- Environment & Climate Change

- Support integrated green infrastructure - Green Corridors for people and wildlife.
- Recommend integration with the public realm strategy to green up the urban areas.
- Recommend encouraging a mixture of planting with low maintenance species.

Re:- Connectivity

- Support walking in and between green spaces, connecting town to the Downs - Green Corridors
- Recommend designing and advertising nature/green walking routes.
- Recommend finding ways to connect up the urban areas with green spaces, creating a natural environment.
- Recommend inclusion of pathways with quality vegetation and greenery alongside to enrich the walking experience.

A handwritten signature in black ink, appearing to read 'Kathryn Adderson', with a stylized, flowing script.

Kathryn Adderson
Lead A&W Green Spaces and Positive Public Health Group
Public Health & Regulation Manager A&W



ADUR & WORTHING
COUNCILS

Green Spaces and Positive Public Health

Co-Authors: Joy Moir, Kathryn Adderson, Daniel Ross, Tracy Wigzell, Nadeem Shad, Michael Lavender & Ian Winters on behalf of Adur & Worthing Councils. November 2017



Goring Gap to the sea

Contents

Aims	2
Objective	2
Introduction	2
What do we mean by Green spaces?	3
Health impacts under consideration	3
How does this fit with our Council's priorities?	4
So what? What does this mean for Adur & Worthing?	5
The 'So What' Grid - Research & Local considerations	6
Why is this report important for our Planning Policy in Adur & Worthing?	12
What other local data do we have to support this research?	15
In conclusion and what you can do	16
References	18
Appendices	19

Aims

To change the conversation around greenspace. In essence, to bring new critical greenspace research to the forefront of development, redevelopment and enhancement plans. To accelerate the importance of the health and wellbeing benefits of green space.

Objective

Provide a set of recommendations for Adur & Worthing Councils, Worthing & Adur Local Plans, Developers, Communities and Councillors to adopt and aspire to when considering the inclusion or exclusion of Green space during the design or re-development of an area, building or complex.

Introduction

Why should you read this report?

You should read this report because though we all know the benefits of being in green space we do not give it enough of our time to understand why it is important for our health and well being. We are busy doing what we need to do and when we have free time, many of us chose to be in the outdoors of some description, but, did you know that we can make a material difference to the immune system of our local children just by frequently exposing them to various forms of greenery within their first year of life? What could the long term positive NHS impacts be, if more children had stronger immune systems from an earlier age? This is just one example of new and emerging research.

We might think we know what a good green space offers us, but it is becoming increasingly apparent that actually we do not, because if we did, we would redevelop differently. New studies are discovering the benefits are far greater than we could have imagined, way beyond just getting fitter and feeling more relaxed.

We want you to read this report because it is important that we re-think how we develop our place because green space is critical for our societies long term physical and mental well being and health benefits.

The research and data available to substantiate these statements is overwhelming and it is increasing the credibility of reviewing a green space not just from an ecology, biology and biodiversity perspective for the preservation and protection of non humans, but for it's critical benefits for the quality of life it enables humans as well.

The 2016 WHO Urban Green Spaces & Health Report summarises the available evidence of beneficial effects of urban green spaces on, such as, but not exhaustive:

- Improved mental health & cognitive function
- Reduced cardiovascular morbidity and mortality
- Reduced obesity and risk of type 2 diabetes

What do we mean by 'Green Space'?

The scope of the green space definition for the purpose of this report is to be found in the A&W Council's' Open Space Study Assessment Report of March 2014 (aligned to PPG17) and comprises:-

1. Parks & Gardens
2. Natural and semi-natural greenspaces
3. Amenity green spaces
4. Allotments
5. Green corridors
6. Cemeteries, disused churchyards, burial grounds.
7. Residential & Commercial re-developed and new build locations

Health impacts under consideration

This report will share UK and global research and evidence showing results for each of the below health impacts that receive direct benefits of close and/or regular proximity to Green space. The data in the main comes from the The 2016 WHO Urban Green Spaces & Health Report. We share a small fraction of what is currently available and would encourage more reading as the evidence is compelling. Below, are the key ailments we have focused on.

- **Improved relaxation and restoration** - It has been recognised and well documented for centuries that contact with nature can be restorative and evidence of mental health benefits from having contact with nature and green spaces
- **Immune system** - Research suggests that immune systems may benefit from relaxation provided by the natural environment or through contact with certain physical or chemical factors in the green space
- **Enhanced physical activity, increased fitness, reduced obesity** - Physical inactivity is identified as the fourth leading risk factor for global mortality (WHO, 2010a)
- **Natural sounds versus anthropogenic noise buffering** - Noise pollution is a major and increasing threat to human health, due to continuing urbanization, rising traffic volumes, industrial activities, and a decreasing availability of quiet places in cities.
- **Air pollution** - Vegetation (trees, shrubs, herbs and grasses of certain species) have been shown to dampen the impacts of road traffic and industries in urban residential areas providing benefits for public health
- **Improved sleep** - Adequate sleep is crucial for good health, while sleep deprivation has been linked to adverse health outcomes, green space access may benefit health through increasing people's exposure to natural patterns of daylight, hence helping to maintain circadian rhythms.
- **Heat related morbidity** - Heat related morbidity in cities is a major public health concern. It arises due to replacement of vegetation with impervious heat-absorbing surfaces in urban areas.

- **Mental health and Cognitive function** - Studies of green spaces and health have demonstrated stronger evidence for mental health benefits, and for stress reduction, compared with other potential pathways to health
- **Reduced cardiovascular morbidity** - Studies have found an association between low quantities of neighbourhood green space and elevated risk of circulatory disease
- **Reduced type 2 diabetes** - It is well-known that type 2 diabetes can be prevented by lifestyle interventions that improve physical activity and reduce obesity
- **Improved pregnancy outcomes** - Systematic reviews have shown access to green space in close proximity to the homes of pregnant women was positively associated with birth weight.
- **Reduced morbidity** - Evidence that exposure to urban green space is linked to reduced mortality rates is accumulating.

This report will delve into each of the above to showcase just some of the research and data available that demonstrates beyond doubt that the quality, quantity, availability and accessibility of green spaces is paramount for how our local area can develop in close proximity to nature to increase the health and wellbeing of those who live and work in the area.

How does this fit with our Council's priorities?

This report fits with our Adur & Worthing priorities as follows:-

1. Platforms for our Places - 'Stewarding our Natural Resources'

3.2.4 - Develop new collaborative/integrated models of management of our parks, public spaces and biodiversity, & engagement of our community and;

3.4.1 - Better use our open spaces for health & wellbeing eg. using parks & open spaces more, for exercise & relaxation

2. The 'Ways of Living Principles' for a sustainable Council (Commitment 5c)
Connecting people to nature. Access too and a strong relationship with nature are critical to our health and wellbeing.

3. Public Health Delivery Plan Brief 16/17:

Promoting Public Health using existing resources & a diverse team of officers from different disciplines. The study involved a cross-cutting Team of officers from Planning Policy, Sustainability, Environmental Health (Noise/Air Quality), Parks & Digital.

So what? What does this mean for Adur & Worthing?

See the below Grid of information which looks at each of the following:

- Health impact
- The research available
- What might Adur & Worthing do about it.

The Grid breaks down each impact and shares some of the latest research is saying. It then makes suggestions on what Adur & Worthing might do to mitigate the adverse impact and help to future proof our place to minimise these health impacts over the long term.

These are suggestions, but we aim to get people thinking of what could be possible and to start a new way of thinking around the design and use and utility of each existing space we have.

We also want you to consider what else could be achieved thinking about the new development and redevelopment that is happening around our place. Where are the opportunities and how might we make them include this research and suggestions?

Green spaces research & Adur & Worthing considerations

Health Impact	Researcher/s	Research conclusions and highlights	Adur & Worthing considerations as a result
Improved relaxation & restoration	Ulrich (1983) & Ulrich et al., (1991)	Psychophysiological stress reduction theory proposes that contact with nature (e.g. views of natural settings) can have a positive effect for those with high levels of stress, by shifting them to a more positive emotional state. As people are innately predisposed to find non-threatening natural stimuli relaxing, exposure to these stimuli triggers a parasympathetic nervous system response leading to feelings of enhanced well-being and relaxation.	1. With reference to the Open Space Strategy, do all the Wards meet the minimum standard for provision of open space and provision of new? Use the planning process & the Local Plan process to enable this. 2. Do all residents have walking access to a green space within 15 min? This is the most critical question to be asked and delivered on. Quote relevant research. 3. Design and deliver promotion of spaces, enhancement, events and what the key individual health benefit are from by being closer to nature. Champion greenspace partnership work and opportunities. Connect with other organisations.
	Gidlow et al.,(2016)	Walking in natural environments produces stronger short-term cognitive benefits than walking in the residential urban environment	4. Local Plan process can help provide a policy framework to help protect/improve existing green space and encourage a high standard of design of all new development including landscape/green space amenity space provision/private including garden space.
	Roe et al., (2013), Ward Thompson et al., (2012); Beil & Hanes (2013)	Using the diurnal cortisol pattern as a biomarker of chronic stress is an innovative approach that was applied in the United Kingdom to demonstrate that exposure to green space reduces chronic stress in adults living in deprived urban neighbourhoods.	5. New public realm strategy should provide an opportunity to improve the town centres public space. 6. Design and advertise nature/green space walking routes around Adur & Worthing. 7. Enhance and encourage urban design using the public realm strategy to 'green' up the built up areas. Find ways to 'connect' the urban areas to the greenspaces, creating a natural environment. 8. Design programs that target the public to 'clock up' time in our natural spaces. Sign post in our parks 'quiet spaces' or areas to 'clock up' nature time? 9. Create more 'pocket parks' for deprived areas.
Improved functioning of the	Lynch et al (2014)	Children with the highest exposure to specific allergens and bacteria, provided by interaction with various forms of vegetation during their first year were	1. Share this information with all doctor surgeries and hospitals. Work with primary education and NHS, nurseries, early years to enable interventions and education.

immune system		least likely to have recurrent wheeze and allergic sensitization	<p>2. Make sure all green spaces have a mixture of planting to support this research.</p> <p>3. Encourage all new developments and redevelopments have mixed greenery to support this research, especially in family orientated areas. Issues of viability eg low maintenance species?</p> <p>4. What value do we hold for domestic garden space and driveways to prevent reduction in size and quality? How do we share good practice from Highdown to all to enable knowledge shift.</p> <p>5. Planning policy via supportive local policies could help support aspirations here.</p> <p>6. Development management at application stage could support/encourage landscaping schemes that encourage most appropriate planting.</p> <p>7. How do we ensure we have internal landscaping advice on planning applications? How can we bring this fact alive in our green spaces?</p>
	Rook (2013)	Another suggested immunological pathway is through exposure to diverse microorganisms in the natural environments which can play an immunoregulatory role.	
	Kuo (2015)	Suggested there is a central role for enhanced immune functioning in the pathway between nature and health	
Enhanced physical activity, improved fitness & reduced obesity	Schipperijn et al., (2013); Lachowycz and Jones, (2014); Sugiyama et al., (2014); Gardsjord et al., (2014); James et al., (2015)	Several studies in various countries have demonstrated that recreational walking, increased physical activity and reduced sedentary time were associated with access to, and use of, green spaces in working age adults, children and senior citizens	<p>1. Put 'step counts' between parks or in parks to highlight the benefits of moving around. Identifying the local walks that exist and promote them - improve signage/mapping etc.</p> <p>2. Are we proactively going out to the community with particular focus on those groups that may benefit most from this research?</p> <p>3. Grade our current spaces in line with this research and design all future spaces accordingly. Upgrade current open space study combining health layer - Planning Policy/Parks.</p> <p>4. Baseline all green spaces in line with Green Flag but in the future aspire to emulate a best in class green space for all parks, greenspaces and development, whether new or re-development.</p> <p>5. Carry out a review of our spaces in line with proximity to care homes and ageing neighbourhoods. Are they green and good enough to promote and close enough, to encourage use by the older generation? What would need to be added/changed to increase this?</p> <p>6. How is this impacted through our social housing program?</p>
	Björk et al. (2008) and De Jong et al. (2012)	They found a positive association between high quality green spaces in the neighbourhood and higher levels of physical activity, as well as improved self-assessed health. High quality green space was defined as having a comparatively high number of recreational attributes, out of a total of five assessed by experts, including qualities associated with historical and cultural associations, spaciousness, richness of natural species, peaceful qualities and wildness.	
	Aspinall et al., (2010). Sugiyama & Ward Thompson	The quality of the urban green space and its proper maintenance may be important factors in green space usage by older adults. It was demonstrated an association between the quality of	

	(2008)	neighbourhood open space and increased walking in older people in the United Kingdom	
Anthropogenic noise buffering versus natural sounds	WHO, 2011	The range of disease burden from noise pollution is estimated at 1.0 – 1.6 million Disability Adjusted Life Years in the European Region	
	González-Oreja et al., (2010); Irvine et al., (2009)	Evidence suggests that a well-designed urban green space can buffer the noise, or the negative perception of noise, emanating from non-natural sources, such as traffic, and provide relief from city noise	
	Pathak et al., (2008)	Vegetation has been considered as a means to reduce outdoor noise pollution, mainly in areas with high volumes of traffic. A study in Uttar Pradesh, India showed significant reductions in traffic noise pollution from vegetation belts of 1.5 – 3 m width and a similar height range, with greater noise reduction as noise frequency increased (peak attenuation occurred between 2.5–5 KHz	
Reduced exposure to air pollution	Madureira et al., (2015)	Vegetation (trees, shrubs, herbs and grass) can dampen the impacts of road traffic and industries and improve air quality in urban residential areas providing benefits for public health. Urban residents in different countries (Portugal and France) have recognized the role of green space in improving perception of air quality	<p>1. Audit developments past and present to ensure quality planting, with the right width, depth and height has been achieved to future proof these developments for the long term. Current best practice is to ensure developments use good design principles to minimise exposure - e.g. maximise distance between receptor and source.</p> <p>2. Any 'gaps' to be planted with appropriate trees and vegetation.</p> <p>3. By holding this research as critical there are also proven mental health benefits from obscuring the source of the pollution (noise and air quality), in other words if the source is unseen the brain tends not to register the source and so it is perceived as not being there (e.g. traffic).</p> <p>4. Create an education program for local residents to highlight and exemplify what good noise and air pollution reduction remedies could be for residential properties to help increase the carbon collection and noise reduction throughout the locality.</p>
	(Liu and Li, 2012, Nowak et al., 2006, Vailshery et al., 2013, Baró et al., 2014, Nowak et al., 2013, Calfapietra et al., 2016)	Trees and other vegetation can decrease levels of air pollutants and reduce atmospheric carbon dioxide through carbon storage and sequestration.	
	Dadvand et al., (2012a)	Therefore, green spaces provide indirect health benefits in addition to those associated with direct contacts with greenery	

Heat related morbidity	WHO and WMO, (2015)	Heat related morbidity in cities is a major public health concern . The Urban Heat Island effect can be a serious health hazard during heat waves and extreme heat events. It arises due to replacement of vegetation with impervious heat-absorbing surfaces in urban areas	<p>1. Identify areas where little vegetation and trees exist. This is especially relevant where elderly populations live and where other vulnerable areas might be impacted by urban heat hot spots, especially as temperature rises are expected to increase over the coming decades.</p> <p>2. Create local 'adopt a tree' initiatives to engage the community as a way to educate and involve. Trees take years to grow so involving local children would also have long term benefits.</p> <p>3. Carry out further research from other nations who have adapted their city plans to mitigate this scenario, e.g Singapore.</p>
	Smargiassi et al., (2009); Basagaña et al., (2011)	Exposure to excessive heat is linked to increased morbidity and mortality, especially in vulnerable subpopulations, such as the elderly.	
	Shisegar (2014)	Another review indicated that urban greenery, including parks, street trees and green roofs, mitigate Urban Heat Island effects.	
Optimized exposure to sunlight & improved sleep	Gillie, (2005)	Humans get most of their vitamin D from exposure to sunlight, and optimum levels of vitamin D are important for overall health and well-being, especially bone density, so access to green space may contribute to better levels of vitamin D and associated health benefits.	<p>1. As this research is particularly important for northern Europeans whose environment lacks high level sunlight for significant parts of the year, and for older people, since the ability to synthesise Vitamin D decreases with age, create initiatives around the locality.</p> <p>2. Signpost 'sunspots' near care homes with benches to promote movement and rest for the older generation. (sunscreen advice to be provided at the same time)</p> <p>3. Promote healthy sleep initiatives by connecting the working professionals, especially men, to getting into green and blue spaces during lunchtimes.</p>
	Liu et al., (2014)	Recent research also suggests that UV-induced release of nitric oxide from skin may have unexpected health benefits, including lowering the incidence of hypertension and cardiovascular disease (CVD) that is particularly associated with lower latitudes and winter months	
	Schmid et al., (2015); Kohansieh & Makaryus,(2015); Miller, (2015)	Adequate sleep is crucial for good health, while sleep deprivation has been linked to adverse health outcomes, such as metabolic syndrome, cardiovascular morbidity and mortality, and neurocognitive disorders, such as dementia	
	Grigsby-Toussaint et al. (2015)	In the United States, it was found that access to natural environments reduced the prevalence of self-reported insufficient sleep in adults, especially men. Therefore, green space access may benefit health through increasing people's exposure to natural patterns of daylight, hence helping to maintain circadian rhythms.	

Improved mental health & cognitive function	Reviewed by de Vries, (2010); Gascon et al., (2015)	Studies of green spaces and health have demonstrated stronger evidence for mental health benefits, and for stress reduction, compared with other potential pathways to health	<ol style="list-style-type: none"> 1. Ensure this research is included within all planning policy to ensure new developments and redevelopments are designed in such a manner to promote walking and stress reduction outcomes as the norm. 2. Create Green space therapists (based on Japanese and South Korea forest therapists) They employ individuals as forest therapists to encourage and support the general public in nature to improve their wellbeing and understanding of the benefits of being out in nature. 3. Create initiatives and activities for schools and families to help support ADHD children spend quality time in nature. 4. Work with NHS and other health providers to use this research as a means to change policy for the long term to increase the knowledge and exposure in nature. 5. Create 'serene' areas in green spaces aimed specifically for people to have peace and quiet.
	Van den Bosch et al.,(2015)	In a longitudinal study, researchers in Sweden found a significant association between gained access to 'serene' green space and improved mental health in women	
	Pope et al., (2015)	A cross-sectional study in England linked the quality of, and access to, green space with reduced psychological distress	
	(Amoly et al., 2014)	Greater usage of green and blue spaces, and greater residential surrounding greenness, have been linked with improved behavioural development (reduced difficulties, emotional symptoms and peer relationship problems) and reduced rate of Attention Deficit Hyperactivity Disorder (ADHD) in children	
Reduced cardio vascular morbidity	Mitchell and Popham, (2008)	A study in the United Kingdom found an association between low quantities of neighbourhood green space and elevated risk of circulatory disease	<ol style="list-style-type: none"> 1. Work with NHS and other health providers to use this research as a means to change policy for the long term. 2. Ensure this research is included within all planning policy to ensure new developments and redevelopments are designed in such a manner to promote walkways to promote healthy movement, but to also include pathways with quality vegetation and greenery alongside to enrich the walking experience. 3. Create 'serene' areas in green spaces aimed specifically for people to have 'peace and quiet' to promote a reduction in blood pressure.
	Grazuleviciene et al. (2015b)	In a Lithuanian intervention study, found that walking in the park had a greater effect on reducing heart rate and diastolic blood pressure than walking in a busy urban street. They suggest that walking in a green space (such as a park) could be encouraged as rehabilitation from coronary artery disease	
	Pereira et al. (2012)	Found an association between the levels and variability of neighbourhood greenness, which was assessed using NDVI data, and coronary heart disease or stroke in Australia. The odds of hospitalization and self-reported heart disease were lower for those living in neighbourhoods with highly variable greenness, compared to those with low variability in greenness.	

Reduced prevalence of type 2 diabetes	Astell-Burt et al., (2014a); Maas et al., (2009b); Bodicoat et al., (2014)	Cross-sectional observational studies in The Netherlands, Australia and the United Kingdom demonstrated significant associations between neighbourhood greenness and reduced odds of having type 2 diabetes mellitus	<ol style="list-style-type: none"> 1. Work with NHS and other health providers to use this research as a means to change policy for the long term. 2. Ensure this research is included within all planning policy to ensure new developments and redevelopments are designed in such a manner to include the variety and specific types of planting that help to reduce air pollutants.
	Thiering et al., (2016)	A study in Germany demonstrated an inverse association between neighbourhood greenness (measured by NDVI) and insulin resistance in adolescents. The authors concluded that this apparent protective effect was due to vegetation reducing exposure to traffic-related air pollutants.	
Improved pregnancy outcomes	Dzhambov et al., (2014)	A systematic review and meta-analysis showed that access to green space in close proximity to the homes of pregnant women was positively associated with birth weight. Birth weight is a useful indicator of health in early life: low birth weight is one of the major predictors of neonatal and infant mortality, as well as long-term adverse effects in childhood and beyond	<ol style="list-style-type: none"> 1. Work with NHS and other health providers to use this research as a means to change policy for the long term. 2. Ensure this research is included within all planning policy to ensure new developments and redevelopments are designed in such a manner that particular care is taken where a development might be young family orientated to create green spaces that encourage positive engagement for pregnant mothers to enable an active pregnancy that can potentially positively aid birth weight. 3. Look at ways to ensure pregnant mothers can have easy access to all green spaces throughout pregnancy. 4. Involve and engage with pregnant mothers on what the requirements & designs should be to entice a closer bond between green spaces and pregnancy.
	Agay-Shay et al., (2014); Markevych et al., (2014); Dadvand et al., (2014b)	Recent studies in Israel, Germany and England also found a positive association between residential greenness measured by NDVI and birth weight	
	Grazuleviciene et al., (2015a)	A study in Lithuania demonstrated that a larger distance to a city park from the homes of pregnant women was associated with increased risk of preterm birth and reduced gestational age at birth	
Reduced mortality	Takano et al., (2002)	Studies in Japan have shown that the five-year survival rate in individuals aged over 70 was positively associated with having access to more space for walking and with parks and tree-lined streets near the residence	<ol style="list-style-type: none"> 1. Carry out a review of our green spaces in line with proximity to care homes and ageing neighbourhoods. Are they green and good enough to promote and close enough, to encourage use by the older generation? What would need to be added/changed to increase this? 2. Work with NHS and other health providers to use this research as a means to change policy for the long term. 3. Ensure this research is included within all planning policy to ensure new developments and redevelopments are designed in such a
	Mitchell and Popham, (2008), (Mitchell & Popham, (2007).	A study of pre-retirement age population in England showed evidence of the influence of the amount of green space in the neighbourhood on all-cause mortality. The study reinforced earlier findings based on the 2001 census population of England, which found that	

		a higher proportion of green space in an area was associated with better self-reported health	manner that particular care is taken where a development is planned for the older generation. What needs to be included from a green spaces perspective to enrich and enhance the residents lifestyles and longevity, especially as we have an ageing population.
	(Villeneuve et al., 2012)	A recent longitudinal study of approximately 575,000 adults in Canada found that increased residential green space was associated with a reduction in mortality ; the strongest effect was on mortality from respiratory diseases. It should be noted that such findings may also reflect the type of urban development and availability of public transport or walkable streets	

Once an understanding is held of what the health and well being impacts can be if we are to seriously consider the positive benefits of green spaces within our area, then we can start to look at how our Local Plans can influence developers to provide healthy green spaces and planting as a result.

This is explained in detail below.

Why is this report important for our Planning Policy in Adur & Worthing?

Worthing Core Strategy 2011

The Core Strategy is one of the key documents that will help to shape the town in the coming years, and, as such, it is essential that the strategy has been based on information collected at the local level. The Core Strategy provides the vision of how Worthing will look in 2026.

Upfront in the Vision is the ambition that *'By 2026 Worthing will have developed as a town with a healthy and diverse population that contributes fully to its future economic growth and prosperity. Development has provided the impetus for regeneration to ensure that Worthing plays a leading role within the wider sub-region.'*

Flowing from this Vision are seven strategic objectives. Of particular relevance to this report are :

- Strategic Objective 1 *Protect the Natural Environment and Address Climate Change*
- Strategic Objective 5 *Reduce Social and Economic Disparities and Improve Quality of Life for All*
- Strategic Objective 6 *Deliver High Quality Distinctive Places*

In order to help deliver these objectives there a number of site specific policies and policies that apply across the Borough. Overall policies seek to protect, provide new or improve existing valued green infrastructure.

Of particular relevance are the following policies;

- **Policy 13 The Natural Environment and Landscape Character**

The development strategy, linked to the importance placed on the surrounding greenfield areas and their landscape sensitivity, allows Worthing to include policy that is primarily protective.

However, it is still recognised that the countryside will, and needs to, change and adapt so it is therefore not intended to prevent opportunities to enhance these important areas.

As a result, development in the countryside will be controlled and will only be considered where a countryside location is justified in that the use can only take place in that location due to their nature, such as agriculture or informal leisure. If development can be justified, proposals must be sensitive to their surroundings in terms of type of activity, siting and appearance.

- **Policy 14 Green Infrastructure**

Worthing's green infrastructure includes parks and gardens, amenity green space, natural and semi-natural green space, sports facilities, allotments, beaches and green corridors.

Worthing also contains parts of a newly designated National Park. All of these areas make a significant contribution to the local character of Worthing and help to provide quality living environments for both residents and visitors alike.

These areas are key to the town's stock of green infrastructure and exhibit significant landscape sensitivity and value. As pressure for development grows over time it remains important to protect and enhance all of the borough's green assets and coastal topography.

These are integral elements of the town and are worthy of detailed consideration in the planning process. If development in and around these areas is to be considered it is important that it avoids any adverse environmental and visual impacts.

- **Policy 16 Built Environment and Design**

Good design will be seen to encompass: architectural design; form; height; massing; scale; proportions; siting; layout; density; orientation; prospect; materials & detailing; car parking; open space; parks and gardens; the relationship between built forms and open spaces; street furniture; the public realm; and public art.

Good design can encourage a sense of place, protect biodiversity, enhance visual appearance, be inclusive and promote economic vitality and healthy lifestyles.

Good design can also improve access requirements, help reduce crime, fear of crime and anti-social behaviour and ensure the prudent use of natural resources.

Emerging Worthing Local Plan

Whilst much of the work in the Core Strategy is still relevant, the new Plan, to be called a Local Plan rather than a Core Strategy, now needs to look ahead to 2033 and work out the

best places for new housing and other growth to go. Limited land availability and sensitive areas of countryside around the borough means that there is little room for expansion. The overarching challenge will therefore be the need to balance development and regeneration requirements against the limited physical capacity of Worthing.

Allocating land for housing is a key role of the Local Plan. Worthing will need to grow to meet the needs of an expanding population. New housing, while helping to meet needs, can also place pressures on existing infrastructure, the environment and natural resources. However, development delivers economic benefits and the opportunity of funding from developers and government to help mitigate those pressures.

Timescale of New Local Plan

The Local Plan consultation (the Issues and Options stage) was held in summer 2016. The consultation document, 'Your Town – Your Future', set out the issues and challenges facing the borough and ways we might address them. The responses received during that stage have helped to shape the emerging Plan and the evidence being gathered to support it. Evidence gathering is still underway and it is expected that consultation on the Draft Local Plan is expected to be undertaken in Spring 2018.

Submission Adur Local Plan

On 20th October 2016, Adur District Council formally submitted the Adur Local Plan and an independent examination of the Adur Local Plan, took place in early 2017. The Inspector's Report has now been received and it concludes that the Adur Local Plan is 'sound' and that it provides an appropriate basis for the planning of that part of the district within the Local Plan area, provided that a number of main modifications are made. The Inspector's Report and the Local Plan documents, incorporating the Inspector's Main Modifications, are to be considered by Adur Full Council on 14th December 2017. The modified Adur Local Plan will be recommended to the Council for adoption. Upon adoption it will form the Adur Local Plan and the development plan for development management purposes.

The vision sets out how Adur will have changed by 2031 if the strategy in this document is implemented successfully. The objectives form a link between the vision and the detailed strategy and will deliver the vision through the policies set out in the Local Plan. The plan has now reached its adoption stage and therefore the policies contained within it can no longer be influenced. However, the plan does contain a vision, objectives and policies that embed the principles of this current study.

Of particular note in relation to this work are the following elements of the vision:

- **V6: High standards of design** will have become an essential part of all new development to help create attractive, safer and healthier places. Significant improvements will have been made to the public realm.
- **V7: Adur's character and local distinctiveness** (urban and rural, coastal and countryside) will have been maintained and enhanced through protection and

enhancement of its landscape, townscape, cultural heritage and biodiversity. Important views will have been protected. Net gains in natural capital will have been delivered. Much of Adur's coastline will continue to be used for leisure and recreation, and public access to the river, harbour, countryside and coast will have been improved. Opportunities will be taken to capitalise on Adur's location adjacent to the South Downs National Park.

Of particular relevance are the following policies;

Site specific policies.

There are a number of specific site policies that reference the need for a Landscape/Green Infrastructure Strategy to deliver a number of elements that would assist in meeting some of the objectives of this study.

These include;

Policy 5: New Monks Farm, Lancing - includes ecological enhancements, provision of open space and recreation areas and formal sports, a county park and areas of woodland.

Policy 6: Land at West Sompting - includes nature conservation, community growing space/orchard, landscape buffers, open space and recreation space, playing pitches.

Policy 8: Shoreham Harbour Regeneration Area - (a more detailed policy will be contained within the Joint Area Action Plan)- includes public open space, improved access to green spaces including the SDNP.

Other spatial policies also emphasise the need for protection of valued characteristics and seek improvements to open space and the local environment as appropriate.

The plan also contains a number of specific policies which seek to protect countryside and coastal areas (and where possible enhance) from unacceptable development. Policies seek to improve access to green spaces, countryside and coast by various modes of sustainable transport.

Design policies for new developments include amongst other matters the need to 'respect the natural features of the site, including land form, trees and biodiversity. Policies also seek to improve public realm and the quality, accessibility and legibility of public street and space.

There are specific policies that seek to protect existing open spaces, provide new spaces and/or improve existing.

What other local data do we have to support this research?

Although we have monitoring and modelling information for air quality and noise level data for Adur and Worthing this is currently mainly tied in with nationally recognised health effects rather than the demonstrable effects on the local population.

The mapping we have carried out does provide proximity data to our green spaces and it can be seen that both high levels of noise and poorer air quality are correlated with the major roads and rail networks and that a large proportion of our green spaces are situated away from these networks. Even where green spaces are relatively close to roads, they tend to be situated at a distance from the carriageway, often behind buildings, so benefit from barrier effects.

Estimates from Public Health England (PHE) suggest the fraction of mortality associated with long term exposure to anthropogenic particulate air pollution is 5.1% in Adur (335 years lost) and 5% in Worthing (577 years lost).

By protecting our green spaces from the intrusion of air pollutants and excessive noise it can be argued that the users of green spaces will benefit to a greater degree. This is supported by the research on health benefits beyond just the visual presence of greenery.

We are mindful of the proven health & well being benefits of protecting the users of communal green spaces from high levels of noise and poorer air quality. In general, elevated noise levels and poor air quality across the area is associated with road and railway corridors - see maps in appendices.

The Public Health and Regulation Team's officers comment on the location and site orientation of buildings in planning applications to help protect not only the occupants of buildings, but also external amenity (green) spaces and have produced Noise and Air Quality guidance to assist developers with this¹.

In conclusion

The challenges ahead for Adur & Worthing are complex, we need housing, we have an ageing population, climate change is upon us and we are experiencing many health and well being impacts of our busy and stressful modern lifestyles.

We have known for a long time that being in nature is restorative and relaxing for us.

What is becoming more apparent recently, is the research from the international arena that for our physical health and well being, our relationship with green spaces and nature is far more important to our existence than has previously been understood.

How then, do we take this new research on board and ensure it doesn't just sit on the sidelines as another piece of 'we know that' data, but we don't have the money, resources or the will to do more with it?

How do we hold the attention of key influences and place shapers that this human need for a closer connection with good quality, diverse green space is actually critical to our mental and physical being and not just something nice to have if possible?

Our aim with this report, is to challenge you, the reader, to stop, and think about what really matters to you, your family and your community to ensure that 200 years from here when the future generations are living in our current homes and working in our locality they have a quality of life that they, and we, can be proud of.

We believe now is the critical time as investment, opportunity and knowledge are increasing at a great pace. We must use this time to ask the right questions and make sure that we future proof every new piece of green space, every current piece of green space, rules for the transformation of green space to urban and visa versa that those who can, and do make the decisions, have had time to sit and digest what is being shared here.

Having green space is good.

Having a great green space is vital.

Have accessible, good quality, green space is what we should strive for to make Adur & Worthing not only a lovely place to visit, but a very healthy place to live and work.

There are towns and cities all over the world who have aligned themselves to a new way of thinking in regard to green space and we must join that increasing stream of smart thinking and ensure our future place changes hold the relationship between human and outdoors green space as important, as having access to electricity, air and water.

We must live in balance with the natural environment around us, because without it, we are surviving, not living.

When we are living in a quality environment with access to good quality green spaces, the positive impacts this has on other systems around the place are also positively impacted. The NHS will see a positive trend of a reduction in admissions, the pressures on local GP's will reduce and this in turn will allow resources to be used elsewhere, saving everyone money, time and enabling a happier community all round.

Also, as is apparent in other countries, such as Japan and South Korea where they have created specific forest therapists, within the natural environment it helps enable a supportive space for people to engage with nature and gain education at the same time. This in turn enables a positive response, which again creates more positivity, reversing trends over time as more people gain a better understanding of what time in green space can actually do for them from a stress, cognitive and restorative perspective.

What you can do

Read and act on the grid in this report. Bring the suggestions to life, and maybe, you have other ideas that would work as well. We don't have all the answers, just the ones we are aware of at the time of writing this report.

It is time to act and ensure we change the conversation, we have one place and how we develop it for our health and wellbeing is in our hands.

It is ours to make better for everyone.

References

Urban Green Spaces & Health - A review of evidence, WHO 2016

Estimating Local Mortality Burdens associated with Particulate Air Pollution, PHE 2014

<https://www.theguardian.com/environment/2017/oct/02/natural-health-service-wildlife-volunteers-get-mental-health-boost>

<http://www.florencewilliams.com/books-1/>

Air Quality and Emission Mitigation Guidance for Sussex, Sussex-air -

<https://www.adur-worthing.gov.uk/environmental-health/pollution/air-quality-and-pollution/air-quality-and-planning/>

Planning Noise Advice Document Sussex, Sussex Local Authorities -

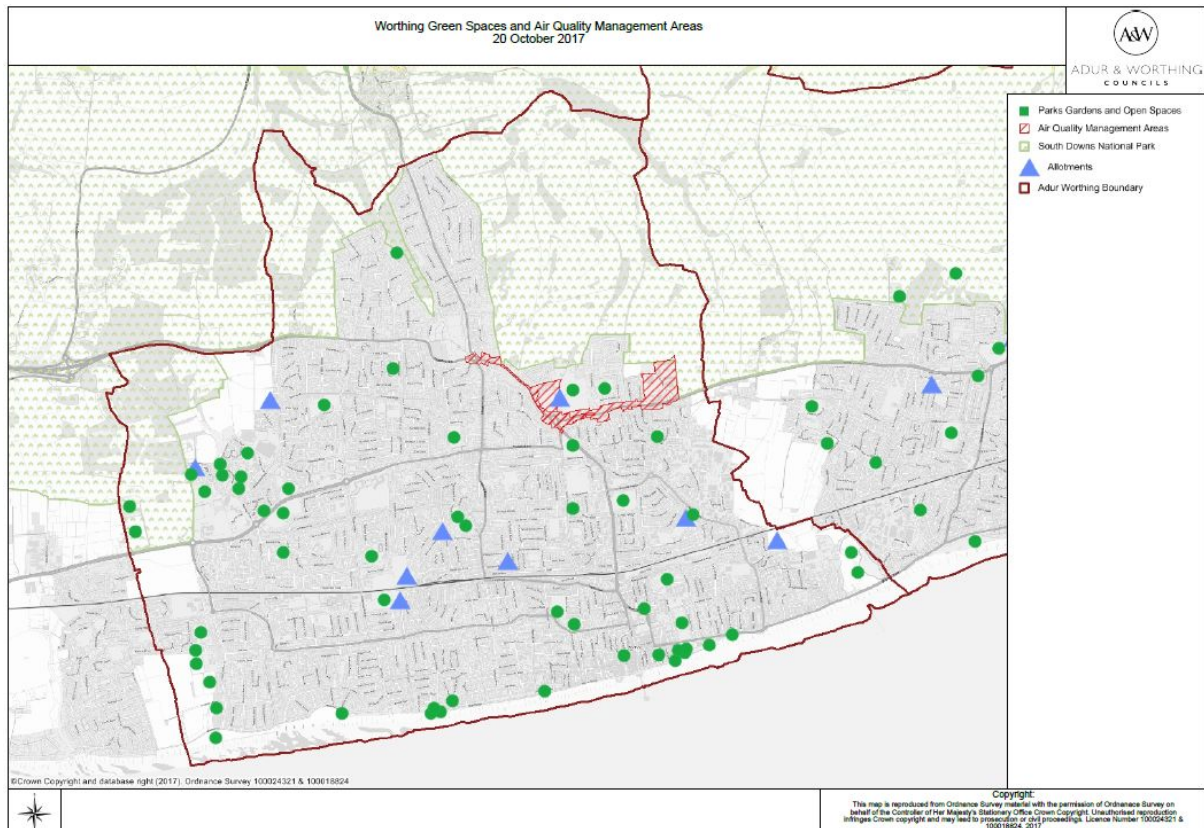
<https://www.adur-worthing.gov.uk/noise/planning/>

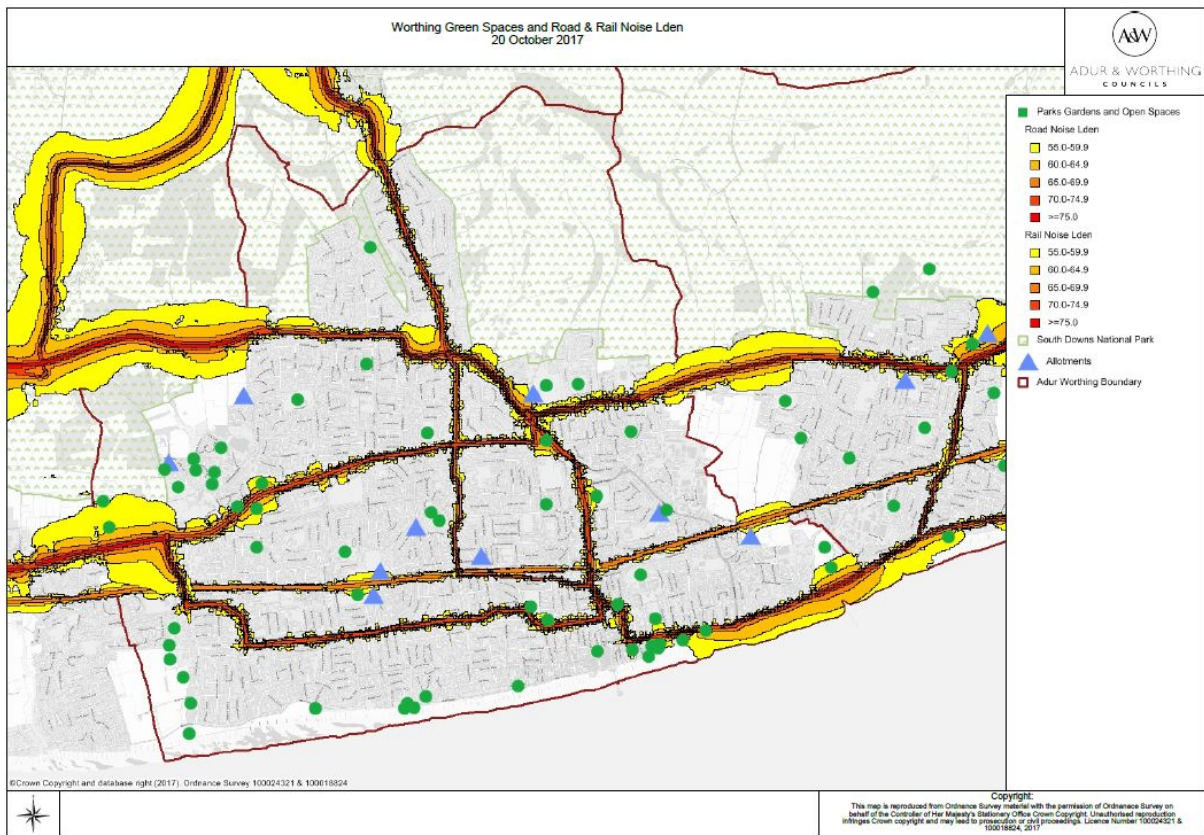
A&W Councils' Open Space Assessment - PPG17 Definitions

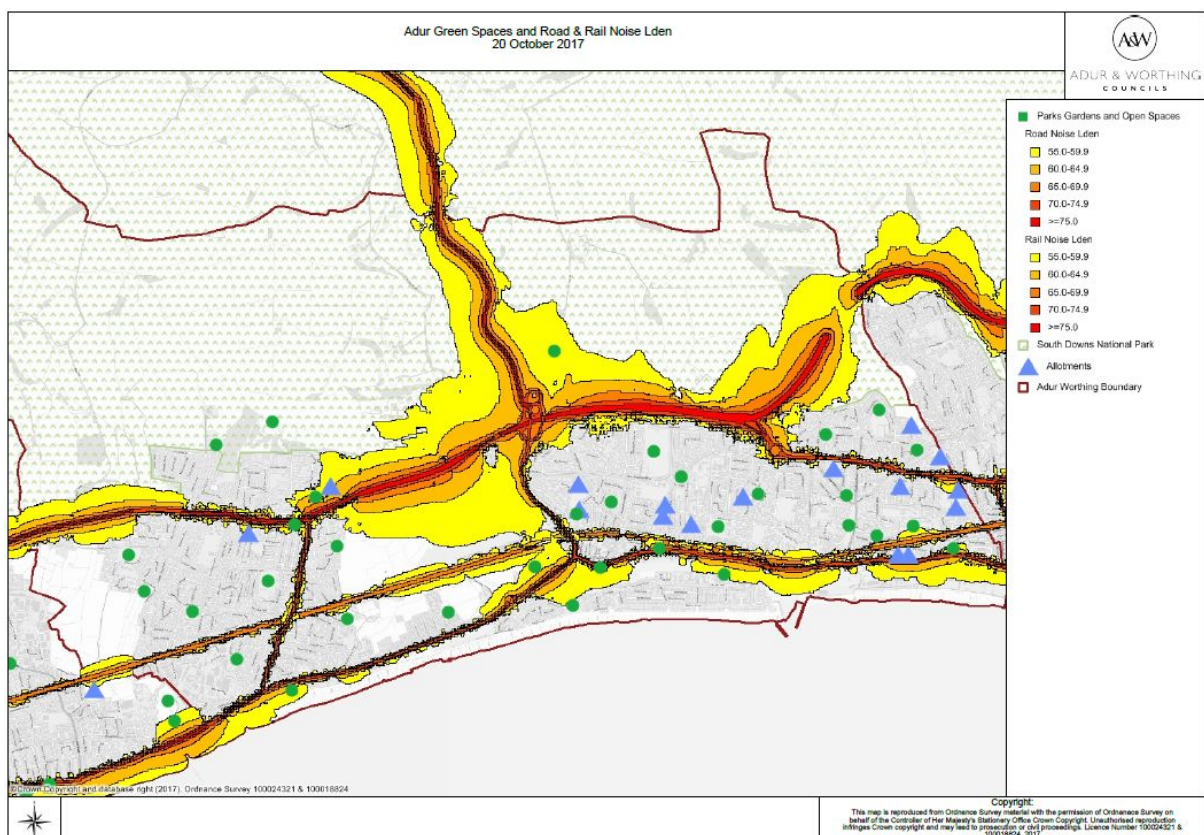
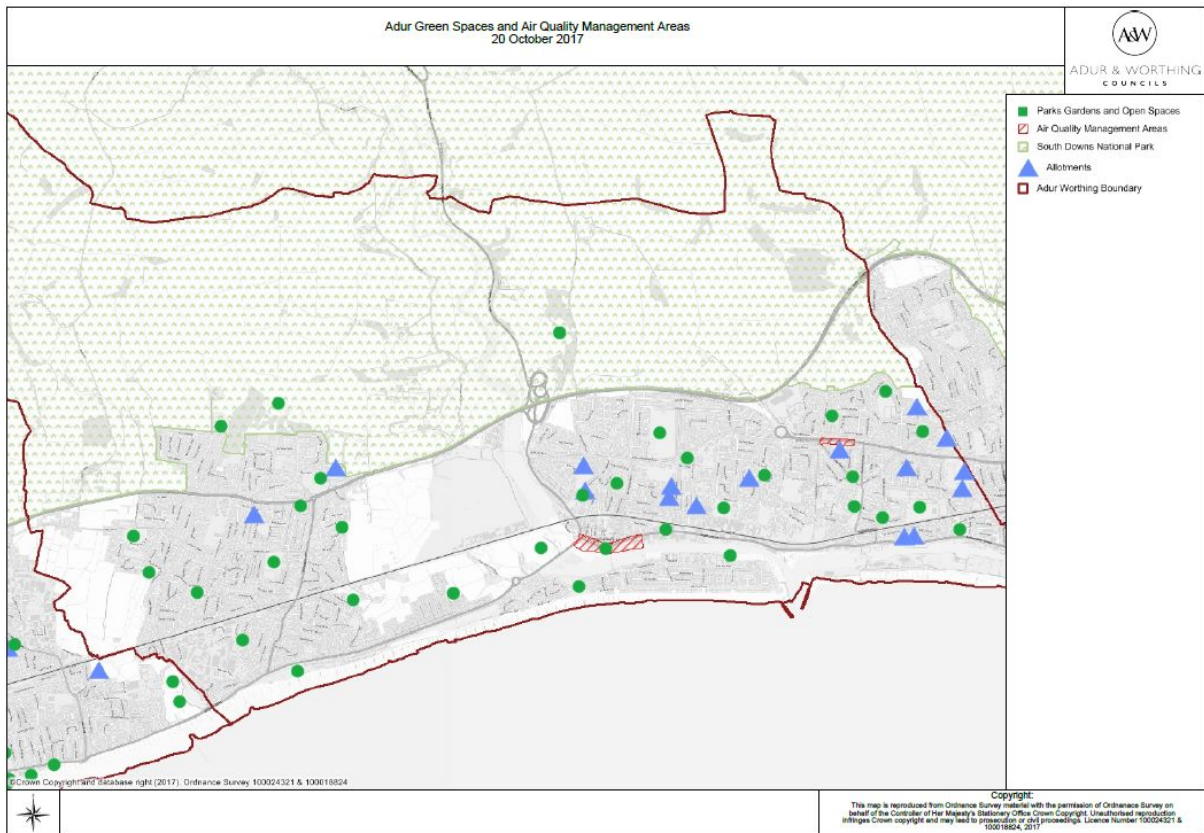
Appendices

Appendix 1

Maps Showing areas of high noise and Air Quality Management Areas for Worthing & Adur







REFERENCE

DWLP-M -83

Date received: 12/12/2018

Draft Local Plan for Worthing Consultation Document October 2018 Comments Form

This consultation runs from Wednesday 31st October
 to 5pm on Wednesday 12th December 2018

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

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

Phone: 01273 263000

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

Section A - Contact Details

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Name	Nathan Burns	Date	
Signed	<i>Nathan B.</i>		

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.

Note: Unless you request otherwise (by putting a cross in the box to the right), all respondents will be added to the Worthing Local Plan consultee database and will be notified at all subsequent stages of Local Plan progression.	No: please don't add me	<input type="checkbox"/>
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In addition, if you would like to subscribe to the Worthing Planning Policy Newsletter (which covers a wide range of Planning Policy issues) then please put a cross in this box:	<input type="checkbox"/>
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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. However, contact details will not be published. Unfortunately, we cannot accept or report confidential or anonymous responses. Further information about how personal information is processed can be found on the Council's website in the Planning Policy Privacy Notice: <https://www.adur-worthing.gov.uk/planning-policy/privacy-notice/>
All data will be stored securely in line with the GDPR.

SECTION B – COMMENTS

As set out below, this consultation document is formed of four parts. It would be helpful if you provide your comments under the relevant sections together with relevant policy number, paragraph and page numbers. However, if your comments are more general then your comments can be inserted in the box below.

GENERAL COMMENTS

This box is a fixed size - please continue on separate sheet(s) at the end if necessary

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 1 - INTRODUCTION AND CONTEXT

(this 'part' includes characteristics of the borough/issues and challenges and vision & strategic objectives)

Natural England welcomes the objectives regarding the environment. We particularly support the recognition of the need to make efficient use of previously developed land; and to protect and enhance greenspaces, undeveloped coastline, settlement gaps and the quality of the natural environment.

PART 2 - SPATIAL STRATEGY

(this 'part' sets out the proposed spatial strategy (what development and where) and the policies to deliver it)

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 3 - DEVELOPMENT SITES

(this 'part' includes details of the proposed future development sites)

A2: Land West of Fulbeck Avenue

Natural England notes that part of the site is deciduous woodland, which is a priority habitat under Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006). This habitat should be retained for the benefit of wildlife and new residents, and to provide a buffer between the development and the National Park.

A3: Land at Upper Brighton Road

Natural England welcomes the recognition of the need to avoid impacts on the setting of the National Park. We also welcome the requirement that development proposals should retain/create wetland and other habitats with high wildlife interest.

A4: Decoy Farm, East Worthing

Natural England welcomes the requirement for development proposals to deliver net gain in biodiversity.

Continued on additional sheet...

PART 4 CORE POLICIES - HOMES AND NEIGHBOURHOODS (Policies CPI – CP6)

CP5 QUALITY OF THE BUILT ENVIRONMENT

Positives – we support the requirement of all new development to respect the existing natural features of the site, especially the requirement to “contribute positively to biodiversity” which is a driver of biodiversity net gain.

Ensuring developments avoid causing light pollution benefits the existing ecological network and is especially important as the South Downs National Park is designated as an International Dark Sky Reserve (IDSR) named Moore’s Reserve.

Improvements – consider directly using the phrase “biodiversity net gain” in CP5 a)viii.

Consider mentioning the South Downs National Park’s role as an IDSR

Minimising impacts on biodiversity and providing biodiversity net gains is in line with the NPPF (8. 170. 174. & 175.) and the DEFRA 25 year plan’s aims (1.1.)

Limiting the impact of light pollution on local amenity, intrinsically dark landscapes and nature conservation is in line with the NPPF (180.) and the DEFRA 25 year plan (Chapter 4.)

CP6 PUBLIC REALM

Positives – we support expecting proposals to incorporate highest quality:

- Landscaping as it will minimise the impacts proposals have on the nearby South Downs National Park

...(continued at end)

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 4 CORE POLICIES – SUSTAINABLE COMMUNITIES (Policies CP7 – CP10)

CP7 HEALTHY COMMUNITIES

Positives – we support aspects of the policy which encourage people to visit natural spaces as this puts people at the heart of the environment. This also allows more individuals to access the benefits of GI assets which increases their value.

Incorporating, protecting and enhancing GI is in line with the NPPF (20. 91. 150. 171. & 181.) and the DEFRA 25 year plan (chapter 3 section 3.i.).

CP8 OPEN SPACE, RECREATION AND LEISURE

Positives – requiring new development to provide open space is a good source of GI which if implemented well could also provide improvements to existing ecological networks.

Improvements – CP8 b)iii. Should be strengthened to require all replacement open space provision to be an improvement of that which has been lost, ensuring a net gain in open space.

Incorporating, protecting and enhancing GI is in line with the NPPF (20. 91. 150. 171. & 181.) and the DEFRA 25 year plan (chapter 3 section 3.i.).

Incorporating, protecting and enhancing ecological networks is in line with the NPPF (170. & 174.).

Providing biodiversity net gains is in line with the NPPF (8. 170. 174. & 175.) and the DEFRA 25 year plan's aims (1.1.)

...(continued at end)

PART 4 CORE POLICIES – LOCAL ECONOMY (Policies CPI1 – CPI4)

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 4 CORE POLICIES – HISTORIC ENVIRONMENT
(Policies CPI5 – CPI6)

PART 4 CORE POLICIES – ENVIRONMENT AND CLIMATE CHANGE (Policies CPI 7 – CP23)

CPI7 SUSTAINABLE DESIGN

Positives – The requirements of this policies may contribute to reducing drivers of antropogenically driven climate change by reducing power use throughout Worthing.

Meeting the challenge of climate change is a key concept of section 14 in the NPPF and is ubiquitously mentioned throughout the DEFRA 25 year plan.

CPI8 ENERGY

Positives – supporting development of renewable and low carbon energy schemes may contribute to reducing drivers of antropogenically driven climate change by reducing Worthing's reliance on conventional fuel energy generation.

Improvements – as Worthing is within the setting of the South Downs National Park proposals for wind energy developments should be required to consider their visual impact on the South Downs National Park.

Meeting the challenge of climate change is a key concept of section 14 in the NPPF and is ubiquitously mentioned throughout the DEFRA 25 year plan.

Conserving and enhancing landscapes and the scenic beauty of landscapes within the setting of a national park is in line with both the NPPF (172.) and the DEFRA 25 year plan (Chapter 2.).

Comment [BN1]: This might be a redundant comment as wind turbine developments may have to consider impacts already

Comment [BN2]: see above

This box is a fixed size - please continue on separate sheet(s) at the end if necessary

PART 4 CORE POLICIES – TRANSPORT AND CONNECTIVITY (Policies CP24 – CP25)

CP24 – TRANSPORT

Positives – promoting and supporting development which encourages sustainable methods of transport reduces the impact of private vehicular emissions, thereby reducing air pollution and contributions as a driver anthropogenic climate change.

Supporting development of walking and cycling routes with better connectivity to the South Downs allows more people to experience the benefits of the South Downs National Park and increases the value people place on the National Park itself.

Reducing vehicular emissions and pollution is a key aim of the NPPF (148. & 170.) being is especially important in section 9.

Meeting the challenge of climate change is a key concept of section 14 in the NPPF and is ubiquitously mentioned throughout the DEFRA 25 year plan.

Increasing engagement with natural environment is a key part of target 6 in the DEFRA 25 year plan.

This box will grow to allow you to add extra comments

Additional comments continuation sheet(s) - please mark clearly which section your comments carry on from

CONTINUING PART 3 – DEVELOPMENT SITES

No site allocations have an impact on any SSSIs, Internationally designated sites.

OS 1, 2 & 3 could all have potential impacts on the setting of the south downs National Park as they are adjacent to the National Park's boundary and any development would have to demonstrate that they would not have a significant impact on the purposes of designation of the South Downs National Park.

OS1: Land east of Titnore Lane

Natural England is concerned that development of this site would affect a Local Wildlife Site, and priority habitat under the NERC Act (2006). Impacts to ancient woodland should also be avoided, in line with the requirements of the National Planning Policy Framework. Therefore, Natural England agrees with the Council's conclusion that this site is not suitable for development.

CONTINUING PART 4 CORE POLICIES - HOMES AND NEIGHBOURHOODS (Policies CP1 – CP6).

CP6 PUBLIC REALM

Positives...

- Green infrastructure as well designed green infrastructure can be a source of biodiversity net gains, natural capital and improvements to the existing ecological network.

Improvements – consider strengthening wording in CP6 b) from “It is expected that new development...” to “It is **required** that new development...”

Conserving and enhancing landscapes and the scenic beauty of landscapes within the setting of a national park is in

line with both the NPPF (172.) and the DEFRA 25 year plan (Chapter 2.).

Incorporating, protecting and enhancing GI is in line with the NPPF (20. 91. 150. 171. & 181.) and the DEFRA 25 year plan (chapter 3 section 3.i.).

CONTINUING PART 4 CORE POLICIES – SUSTAINABLE COMMUNITIES

(Policies CP7 – CP10)

CP10 PLANNING FOR SUSTAINABLE COMMUNITIES / COMMUNITY FACILITIES

Positives – we support the council committing to work with partners to ensure necessary environmental infrastructure is provided for development. As this ensures the infrastructure which is beneficial to the existing ecological networks and overall GI network are delivered.

Incorporating, protecting and enhancing ecological networks is in line with the NPPF (170. & 174.).

Incorporating, protecting and enhancing GI is in line with the NPPF (20. 91. 150. 171. & 181.) and the DEFRA 25 year plan (chapter 3 section 3.i.).

CONTINUING FROM PART 4 CORE POLICIES – ENVIRONMENT AND CLIMATE CHANGE (Policies CP17 – CP23).

CP19 BIODIVERSITY

Positives – requiring relevant coastal developments to demonstrate how they will address coastal squeeze may help lessen some of the pressure on threatened intertidal habitats.

Requiring assessment to be informed by up-to-date ecological information ensures that the impacts on the relevant existing ecological networks are being considered.

Supporting environmental net gain helps improve the overall biodiversity in Worthing while also possibly providing benefits for: existing ecological networks, GI within Worthing and the overall natural capital value of Worthing.

Encouraging tree planting and protecting important trees, especially that of native trees, is a good method to increasing GI within Worthing and if managed well can also be very beneficial for the existing ecological networks of Worthing.

Improvements – the requirement to address coastal squeeze should be strengthened to ensure existing pressures of coastal squeeze will also be reduced.

Contributing to environmental net gain should not be restricted to major developments instead all development (excluding householder applications) should be required to make appropriate environmental net gains which are relevant to the existing ecological network. Wording should also be strengthened by removing “where possible” phrase.

Policy g) should encourage the planting of native trees especially.

Minimising impacts on biodiversity and providing biodiversity net gains is in line with the NPPF (8. 170. 174. & 175.) and the DEFRA 25 year plan’s aims (1.1.).

Incorporating, protecting and enhancing ecological networks is in line with the NPPF (170. & 174.).

Incorporating, protecting and enhancing GI is in line with the NPPF (20. 91. 150. 171. & 181.) and the DEFRA 25 year plan (chapter 3 section 3.i.).

Incorporating and contributing to natural capital is in line with the NPPF (170. & 171.) and is a key concept within the DEFRA 25 year plan.

Suggested wording - “d) Where relevant, new development adjacent to the coast will have to demonstrate how it is **addressing reducing the issue impacts** of coastal squeeze”

“f) ~~Major~~ **All** development (**excluding householder applications**) should take account of and incorporate biodiversity features at the design stage and ~~where possible~~ **environmental net gains** should be achieved.”

CP20 GREEN INFRASTRUCTURE

Positives – the commitment of the council to facilitate an integrated GI network will be very beneficial to the wider ecological networks of Worthing.

Natural England strongly supports the commitment to produce a GI strategy as this will help shape the future of Worthing’s biodiversity and if done well could: contribute to biodiversity net gain, improve existing ecological networks and increase natural capital stocks within Worthing.

Requiring developments to demonstrate how they will contribute to GI strategy implementation ensures

GI assets will be improved and may result in benefits to existing ecological networks. The commitment to ensuring long term management and maintenance of GI is identified and secured ensures that GI assets continue to provide benefits both for Worthing's residents/visitors and existing ecological networks.

Incorporating, protecting and enhancing GI is in line with the NPPF (20. 91. 150. 171. & 181.) and the DEFRA 25 year plan (chapter 3 section 3.i.).

Minimising impacts on biodiversity and providing biodiversity net gains is in line with the NPPF (8. 170. 174. & 175.) and the DEFRA 25 year plan's aims (1.1.)

Incorporating, protecting and enhancing ecological networks is in line with the NPPF (170. & 174.).

Incorporating and contributing to natural capital is in line with the NPPF (170. & 171.) and is a key concept within the DEFRA 25 year plan.

CP21 FLOOD RISK AND SUSTAINABLE DRAINAGE

Positives – encouraging the implementation of effective sustainable drainage systems (SUDS) will provide filtration to surface water run-off thereby increasing the water quality, furthermore these SUDS can provide improvements to the existing ecological network. By encouraging opportunities to incorporate techniques which increase biodiversity and improve water quality it further supports these benefits provided by SUDS.

Ensuring management for ongoing maintenance of SUDS reduces the risk of derelict SUDS having detrimental effects on water quality, existing ecological networks and the GI network.

Improvements – we advise that major developments be required to renovate harmful, antiquated drainage systems such as gully pots with more suitable SUDs. Thereby enabling Worthing to start modernising its surface drainage system to prevent these antiquated drainage systems from introducing pollutants such as nitrates and heavy metals into the chalk aquifer without filtration (alternatively this could be incorporated into policy **CP22**).

Incorporating effective SUDS reduces flood risk and water pollution which is in line with the aims of the NPPF (163. 165. & 170.). it is also in line with the DEFRA 25 year plan's target 2. Clean and plentiful water and is the focus of chapter 1 section 5. ii.

Incorporating, protecting and enhancing ecological networks is in line with the NPPF (170. & 174.).

CP22 WATER QUALITY AND PROTECTION

Positives - this policy contributes to the protection and enhancement of water quality which benefits the wider existing ecological networks and the wider GI network.

Improvements – consider alternative implementation of suggested improvement for **CP21** into this policy instead of **CP21**

Reducing water pollution and water usage is in line with the NPPF (149. & 170.) and is in line with the DEFRA 25 year plan's target 2. Clean and plentiful water.

CP23 POLLUTION AND CONTAMINATION

Positives – this policy ensures development does not significantly increase pollution this should ensure that the existing ecological network is not detrimentally affected by pollution.

Improvements – incorporate light pollution into this policy, especially the impacts it can have on the South Downs National Park as it is designated as an IDSR with the name Moore's Reserve.

Reducing pollution is in line with the NPPF (8. 170. & 180.) and is in a key aim of the DEFRA 25 year plan being the focus of Chapter 4 section 2.

Limiting the impact of light pollution on local amenity, intrinsically dark landscapes and nature conservation is in line with the NPPF (180.) and the DEFRA 25 year plan (Chapter 4.)

REFERENCE

DWLP-M -84

Date received: 12/12/2018

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BN11 1HS

12 December 2018
Ref: BD/Let

Dear Sir / Madam

RE: Draft Worthing Local Plan 2016-2033 (Regulation 18) Consultation

This representation has been prepared by ECE Planning on behalf of Roffey Homes regarding the above consultation. We would like to express our concern regarding a number of elements of the Plan as set out below.

Housing Delivery

Despite Worthing having an Objectively Assessed Housing Need of 12,801 dwellings over the plan period (2016 to 2033), **Policy SP3 Development Sites** sets out a housing requirement of 4,182 dwellings. This is less than a third of the overall need.

Whilst we understand that Worthing has limited opportunities to expand the settlement boundaries due to its geographical location between the South Downs National Park and the coast, we consider that Worthing should be taking a far more proactive role through the emerging Plan to try and reduce this shortfall. This is particularly important given that neighbouring authorities have limited capacity to help meet Worthing's shortfall through the Duty to Cooperate.

Policy CP2 Housing Density sets out a Borough-wide minimum of 35 dwellings per hectare, and a minimum of 50 dwellings per hectare for developments of flats, mixed residential developments, and developments in the town centre and near public transport hubs. In light of the very large housing shortfall, Worthing BC should be far more ambitious in the way it delivers housing.

We consider that the minimum densities proposed under Policy CP2 are not high enough and, at the very least, the Plan should be identifying areas within the borough that are appropriate for higher densities. This could include areas along the seafront and other appropriate corridors, as well as identifying existing areas of low density that are not environmentally constrained where densities could be significantly increased. We would be happy to work with the Council to identify such areas.

Directors

Chris Barker MATP MRTPI Managing Director
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CIL/ S106 Contributions

Policy CP8: Open Space, Recreation and Leisure states that for major residential development, where it is not possible to provide open space on site, contributions will be required. This needs further clarification in the Plan as public open space is currently listed on the Council's Regulation 123 List and is therefore addressed through CIL payments.

This is also an issue that needs addressing for **Policy CP9: Planning for Sustainable Communities/Community Facilities**, as again, the policy states that the Council will seek planning obligations to secure new and improved community facilities and services when this is already addressed through CIL payments and community facilities are also on the Council's Regulation 123 list.

Both policies CP8 and CP9 risk charging developers for the same piece of infrastructure twice ('double dipping') contrary to Paragraph 093 (reference ID: 25-093-20140612) of the national Planning Practice Guidance. These policies either require further clarification or amendment to ensure that they are consistent with national guidance.

Additionally, through the review of the Council's CIL Charging Schedule as part of the production of the new Local Plan, there may be opportunities to incentivise and focus development on brownfield sites through the application of differential CIL rates or other appropriate incentives.

Economic Growth

Policy CP11: Economic Growth and Skills states that major development proposals will need to demonstrate how they contribute to addressing identified local skills shortages, and that the Council will negotiate on a case by case basis and, where appropriate, secure such opportunities by use of a S106 agreement. However, the plan is not at all clear on either how or why new development should address local skills shortages and what types of major development should be contributing to/addressing this. More explanation is required as we are currently not convinced that such a requirement is necessary to make a development acceptable, and consequently we are concerned that this policy does not meet the requirements of the Community Infrastructure Levy Regulations 2010.

We consider all of the above issues raised to be potential soundness issues for the Plan and would request that the Council consider these representations carefully.

ECE Planning

If you have any further queries or require further information please contact me on 01903 248777.

Yours sincerely
ECE Planning

A handwritten signature in black ink, appearing to be 'C. Barker', written in a cursive style.

Chris Barker MATP MRTPI
Managing Director

PD11621/RJC/ARS/EJD

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12 December 2018

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

REFERENCE

DWLP-M -85

Date received: 12/12/2018

Sent via email to
worthinglocalplan@adur-worthing.gov.uk

Corresponding representation form submitted

Dear Sir / Madam,

**WORTHING BOROUGH COUNCIL, DRAFT LOCAL PLAN (2016-2033) REGULATION 18 CONSULTATION
REPRESENTATIONS ON BEHALF OF MAPELEY STEPS LTD**

These representations are submitted by Montagu Evans LLP on behalf of Mapeley STEPS Ltd, in respect of the Worthing Borough Council, Draft Local Plan Regulation 18 consultation.

The Draft Local Plan (Regulation 18) document sets out the emerging policies for growth and change within the Borough up until 2033. The consultation is seeking views on the strategy for development and change in Worthing including possible future housing and other development sites, and development management policies that will guide future development.

It is understood that representations received will help inform the publication version (Regulation 19) of the Plan that will be consulted on and then submitted for Examination in 2019/2020.

Background and context to these representations

By way of background to these representations, Mapeley STEPS Ltd have an interest in the land identified in the Draft Local Plan under Area of Change Policy AOC 5 "HMRC Offices, Barrington Road". The site is not specifically allocated for development at this stage but is designated as an "Area of Change", which are defined as key sites which will play an important role in meeting development needs, but there is currently insufficient delivery certainty for these sites that would justify a specific allocation. It is welcomed that throughout this process, as more certainty is established, that AOC 5 will transfer into an allocation.

Draft Policy "AOC 5: HMRC Offices, Barrington Road" sets out identification of the site with an indicative housing capacity of 250 residential units and 2,500 sqm of B1 space. The Policy goes on to note the existing site characteristics and the fact that HMRC's lease on the site is due to come to an end in 2021, at which point the site will become available for "mixed use development". The draft policy goes on to state that any future development proposals will need to consider/meet a series of requirements, which include the following:

- Deliver of mix of residential and employment uses;
- Ensure that any contaminated land issues are appropriately assessed and managed;
- Retain high quality trees in and around the site;

- Mitigate any impacts if noise and vibration resulting from the presence of the railway line to the north of the site;
- Not prevent (or negatively impact) the potential for development on land lying adjacent to the west of the site (AOC6 – Martlets Way);
- Seek to improve access to and from Durrington Station;
- Provide appropriate junction improvements at Barrington Road/Shafesbury Avenue.

In June 2018, Montagu Evans formally submitted a pre-application enquiry on behalf of Mapeley STEPS Ltd for the redevelopment of the site for residential accommodation, a care home and extra care units, associated landscaping, parking, infrastructure and other associated works. The pre-application documentation demonstrated how the following development parameters could be delivered on site:

- 261 residential dwellings;
- 146 retirement flats;
- 68 bed care home; and
- 489 car parking spaces.

During initial pre-application discussions with the Council, the principle of land uses to be supported by the Council is currently ongoing, including the likely development parameters which could be supported. Application preparation is still in its infancy, whilst technical studies are being undertaken to inform design parameters. Further pre-application engagement with the Council, including attendance at Worthing's Major Projects Board, will be undertaken in the coming months prior to a programmed submission in early Spring 2019.

Residential capacity of the site

As evidenced through the pre-application enquiry lodged with the Council, we fully support the allocation of the site for residential development in order to assist the Council in meeting the identified housing need. However, we consider that the site can accommodate more than the indicative capacity of 250 dwellings, as per the pre-application submission.

The Council are clearly committed to increasing housing delivery, as paragraph 2.16 of the Draft Local Plan notes that to be consistent with the NPPF, the most up-to-date assessment of objectively assessed housing need (based on 2016 household projections) is 12,801 dwellings over the Plan period (to 2033) which equates to 753 dwellings per annum. The Draft Local Plan notes that this is significantly higher than the current Core Strategy requirement to deliver 200 dwellings per annum and the average annual delivery rate of 285 dwellings per annum delivered between 2006 and 2017. The Draft Local Plan in Policy SP3 (Development Sites) seeks to deliver the maximum amount of growth possible in order to meet the minimum housing target of 4,182 dwellings, at an annual rate of 246 dwellings from 2016 to 2033. The housing target, as referred to in Paragraph 2.32, notes that this is a capacity-based figure on the level of housing which can be delivered within the Plan period, having regard to the identified constraints and potential development capacity.

Policy SP3 represents the realistic level of housing development which although takes a positive approach to the allocation of sustainable sites, falls significantly below the levels of housing need identified with only 33% of the overall housing need being met, with a shortfall of approximately 8,600 dwellings.

The Draft Housing Implementation Strategy notes that the Council, when applying a 5% buffer against a target of 246 dwellings per annum can demonstrate a 10 year supply of deliverable sites. This demonstrates that a five year supply of deliverable land is achievable against the proposed housing target in this Draft Local Plan. However, in accordance with NPPF requirements measuring supply against the Standard Methodology, the Council can only demonstrate a 2.9 year supply of deliverable sites.

The NPPF states that applications should be considered in the context of sustainable development and that where there are no relevant development plan policies, or the policies which are most important to determining the application are out-of-date, permission should be granted. This includes applications involving the provision of housing and situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer, as set out in Paragraph 73 of the NPPF). The ability for the Council to demonstrate a 5 year land supply is at risk to external factors which are outside of the Council's hands such as any downturn in the economy affecting overall delivery.

AOC 5 is noted as the Council's largest identified site which will contribute to the future delivery of housing in the Borough. As such, its delivery and ability to maximise the site's capacity, whilst taking into consideration the site's constraints and surrounding context is key to housing delivery on this brown field site.

Paragraph 123 of the NPPF encourages the optimisation of land to meet as much of the identified need for housing as possible. This should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate.

This is reflected in draft Policy CP2 (density) of the Draft Local Plan, which states that new housing developments must make the most effective use of the land, taking into account the character of the local area, and on average seek to achieve around 35 dwellings per hectare. Part c of policy CP2 is supported where it is noted that where there are mixed residential developments or developments in the town centre or near public transport hubs these should achieve densities in excess of 50 dwellings per hectare (our emphasis).

The site is recognised as a key location for delivering housing and is allocated for considerable residential development. Therefore by accommodating up to 407 units, an additional 157 above the draft designation, the site would be able to optimise its housing potential and aid in meeting the Borough's housing requirements. The Council could make the Plan deliverable by being more ambitious in their housing targets for allocated sites in order to assist in meeting their five year housing land supply and seek to bridge the large gap between the identified need for housing and the Plan's targets in Policy SP3.

With the above in mind, the site measures 6.88 hectares and therefore applying the above draft policy for a 100% residential site the proposed 261 dwellings plus 146 retirement flats would equate to a density of 59 dwellings per hectare. This demonstrates that the density of the pre-application proposal for residential dwellings when part of a comprehensive redevelopment for the provision of retirement accommodation and a care home accords with both local policy and the principles of the NPPF.

Employment Floorspace

Draft allocation AOC5 sets out that the site has capacity for 2,500 sqm of B1 floorspace. In light of local demands and requirements within Worthing it is proposed that the employment allocation is widened to incorporate a range of employment uses including B1, B2 and B8 so to not prejudice the nature of employment brought forward on the site to reflect the demand within Durrington.

Although a point of detail, the western portion of AOC 5 adjacent to land reference AOC 6, should be considered the most appropriate location for employment floorspace.

Summary and Closing

It is clear that the AOC 5 represents a specific, reliable and developable site, offering a realistic prospect for the delivery of housing within the next five years. The site presents a major opportunity for the Council to address their housing delivery shortfall and it should be given precedent in seeking to maximise the site's capacity in the sustainable location adjacent to the railway.

For the reasons outlined above we consider that the site allocation should be amended to increase the capacity of the site to up to 407 residential dwellings (which includes 146 retirement flats), an additional 157 to the target prescribed in the draft Area of Change Policy. The representation also seeks to broaden the nature of employment floorspace on the site to cover B1, B2 and B8 uses.

Finally, whilst writing, it should be noted that Mapeley STEP Ltd are in active discussions with the promoter of the adjacent former Gas Holder Site and land at Martlets Way (allocated for development by draft policy AOC6) in the interests of considering a comprehensive solution relative to the three sites. It is considered that, if the three sites could potentially be brought forward on a comprehensive basis they could deliver increased levels of residential development than maybe be possible if they were developed separately. Correspondingly, a larger quantum of residential development not only offers the potential to deliver higher levels of affordable housing, but could also support a larger amount of employment floorspace than might otherwise be the case.

Mapeley STEPS Ltd intend to continue to engage with the Council throughout preparation of the new Local Plan and we therefore request that we are kept informed of any updates going forward. As per the accompanying Representations Form, we would like to have the right to participate at the oral examination if necessary.

Please do contact John Cohu or Anna Russell-Smith at this office if you have any queries or if you would like to discuss further.

Yours faithfully,



**R J COHU
PARTNER
MONTAGU EVANS LLP**

Office use Only:	
Comment number	
Date received	

Draft Local Plan for Worthing Consultation Document October 2018 Comments Form

**This consultation runs from Wednesday 31st October
 to 5pm on Wednesday 12th December 2018**

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


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

Phone: 01273 263000

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

Section A - Contact Details

First name	John		
Last name	Cohu		
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Town	London		
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Email address	John.cohu@montagu-evans.co.uk / anna.russell-smith@montagu-evans.co.uk		

Name	John Cohu	Date	12 December 2018
Signed			

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.

Note: Unless you request otherwise (by putting a cross in the box to the right), all respondents will be added to the Worthing Local Plan consultee database and will be notified at all subsequent stages of Local Plan progression.	No: please don't add me	
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In addition, if you would like to subscribe to the Worthing Planning Policy Newsletter (which covers a wide range of Planning Policy issues) then please put a cross in this box:	X
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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. However, contact details will not be published. Unfortunately, we cannot accept or report confidential or anonymous responses. Further information about how personal information is processed can be found on the Council's website in the Planning Policy Privacy Notice: <https://www.adur-worthing.gov.uk/planning-policy/privacy-notice/> All data will be stored securely in line with the GDPR.

SECTION B – COMMENTS

As set out below, this consultation document is formed of four parts. It would be helpful if you provide your comments under the relevant sections together with relevant policy number, paragraph and page numbers. However, if your comments are more general then your comments can be inserted in the box below.

GENERAL COMMENTS

Please see letter submitted as part of this representation prepared by Montagu Evans LLP on behalf of Mapeley STEPS Ltd.

This box is a fixed size - please continue on separate sheet(s) at the end if necessary

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 1 - INTRODUCTION AND CONTEXT

(this 'part' includes characteristics of the borough/issues and challenges and vision & strategic objectives)

PART 2 - SPATIAL STRATEGY

(this 'part' sets out the proposed spatial strategy (what development and where) and the policies to deliver it)

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 3 - DEVELOPMENT SITES

(this 'part' includes details of the proposed future development sites)

PART 4 CORE POLICIES - HOMES AND NEIGHBOURHOODS
(Policies CPI – CP6)

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 4 CORE POLICIES – SUSTAINABLE COMMUNITIES
(Policies CP7 – CP10)

PART 4 CORE POLICIES – LOCAL ECONOMY
(Policies CP11 – CP14)

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

**PART 4 CORE POLICIES – HISTORIC ENVIRONMENT
(Policies CPI5 – CPI6)**

**PART 4 CORE POLICIES – ENVIRONMENT AND CLIMATE CHANGE
(Policies CPI7 – CP23)**

This box is a fixed size - please continue on separate sheet(s) at the end if necessary

**PART 4 CORE POLICIES – TRANSPORT AND CONNECTIVITY
(Policies CP24 – CP25)**

This box will grow to allow you to add extra comments

**Additional comments continuation sheet(s) -
please mark clearly which section your comments carry on from**

REFERENCE

DWLP-M -86

Date received: 12/12/2018



Sussex
Wildlife Trust

By email only

worthinglocalplan@adur-worthing.gov.uk

Contact: Laura Brook

Direct Dial: 01273 497508

E-mail: swtconservation@sussexwt.org.uk

Date: 12 December 18

DRAFT LOCAL PLAN FOR WORTHING – CONSULTATION DOCUMENT OCTOBER 2018

The Sussex Wildlife Trust (SWT) recognises the importance of a plan led system as opposed to a developer led process and supports Worthing Borough Council's (WBC) desire to produce a cohesive Local Plan. Therefore we hope that our comments are used constructively to make certain that this draft plan properly plans for the natural capital needed within the Borough and ensures that any development is truly sustainable.

Where we are proposing a change to policy or the supporting text, recommended additions are highlighted in **bold** and deletions are ~~struck through~~.

Part 1 - Introduction

SWT supports the inclusion of the social, economic and environmental tables on pages 7- 9. It provides some interesting contextual information for people who may not be familiar with the area.

Reading through the plan we were surprised that section 1.38, which refers to the West Sussex Joint Strategic Needs Assessment, does not list the importance of the natural environment in promoting positive physical and mental health and a good quality of life. However, we do recognise that the paragraph goes on to state that the Local Plan will seek to address access to the natural environment through policies.

We are supportive of paragraph 1.39 which gives recognition to the challenge WBC will face in terms of climate change resilience.

Vision

The visions proposed in the draft plan should be ambitious in their intention to add to the Natural Capital of the Borough over the lifetime of the plan. We recognise that there is a clear commitment to protect and enhance the environment in (V3) which we support. However, to reflect the clear need to recognise the wider benefits of natural capital, ecosystem services and the requirement to deliver net gains for biodiversity as per section 170 of the National Planning Policy Framework (NPPF) 2018. We recommend the following changes to V3:

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 environment, intrinsic character

Woods Mill, Henfield, West Sussex, BN5 9SD
01273 492 630 | enquiries@sussexwt.org.uk | sussexwildlifetrust.org.uk

Chairman: Carole Nicholson Chief Executive: Tor Lawrence

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

and its coastal and countryside setting have been protected and enhanced, ***adding to the Borough's Natural Capital over the lifetime of the plan.***

Strategic Objectives

In the social objectives we are encouraged to see SO7 recognise the importance of access to nature in encouraging the creation of healthy environments for the community. However, reading the environmental objectives, we feel that there are opportunities to bring forward more ambitious objectives in line with the NPPF (2018).

In SO15, SWT recommends the removal of the 'where possible'. The NPPF (2018) is now very clear that net gains must be sought for biodiversity (section 170d). There is also currently a consultation being run by the Government on net gains which makes it clear that they will be seeking wider environmental net gains in the near future. Proposed modification to SO15:

*Protect, and ~~where possible~~ enhance, valued green spaces, stretches of undeveloped coastline, gaps between settlements and the quality of the natural environment **creating net gains to biodiversity.***

In relation to SO16, we encourage the council to not only improve quality, but take the opportunity to increase the quantity of the natural environment within the town centre and seafront. This could be achieved through small gains such as green roofs on the bus stops or increase pollinator friendly planting through the town. Proposed modification to SO16:

*Improve the quality **and quantity** of the natural environment and public realm within the town centre and along the seafront.*

Although we are generally supportive of the objectives, we feel that they could reflect the ambitions of environmental gains through development with greater strength. Section 175(d) of the 2018 NPPF talks about opportunities to integrate biodiversity improvements in and around development, while section 171 references the importance of green infrastructure. As a result we propose two further Strategic Objectives:

SO21 Protect and enhance the Borough's biodiversity and ensure all development integrates biodiversity which will deliver net gains.

SO22 Deliver high quality green infrastructure and ensure there is sufficient capacity to meet existing needs and the needs arising from new development.

Part 2 - Spatial Strategy

SWT supports the comments made by WBC in section 2.28 that acknowledges that many of the studies used to inform this plan will require an update.

SP2 Spatial Strategy

Having read policy SP2 SWT feel that it is necessary to seek clarity on the following matters. The first bullet point in section a)i. states:

- *seek to provide for the needs of local communities and balance the impact of growth through the protection and enhancement of local services and (where appropriate) the safeguarding of employment sites, leisure uses, community facilities and valued green/open spaces;*

We would like clarity on why *where appropriate* is used in this criterion as there is a clear requirement in the NPPF (2018) to deliver net gains for biodiversity.

Further to this, there is a reference to valued green/open spaces, we are unclear as to how it might be assessed. This section would benefit from referencing the need to steward the Borough's Natural Resources as set out in the Adur and Worthing Council's platforms for places criteria (2.9).

Point iii of the policy would benefit from reflecting the importance of features which connect open spaces and gaps and enable connectivity and climate change resilience as 170(d) the NPPF 2018.

We have raised points of clarity regarding this policy which when answered may lead to further modifications of the policy. However at the current time we make the following suggested amendments:

a) Up to 2033 delivery of new development in Worthing will be managed as follows:

i. Land within the Built Up Area Boundary-development will be permitted subject to compliance with other policies in the Local Plan. Development should make efficient use of previously developed land but the density of development should be appropriate for its proposed use and also relate well to the surrounding uses and the character of the area. The Local Plan will:

- seek to provide for the needs of local communities and balance the impact of growth through the protection and enhancement of local services and ~~(where appropriate)~~ the safeguarding of employment sites, leisure uses, community facilities, and valued green/open space **and natural resources**;
- help to deliver wider regeneration objectives, particularly in the town centre and seafront, through the allocation of key urban sites and the identification of Areas of Change;
- seek to increase the rate of housing delivery from small sites.

ii. Edge Of Town Sites -three edge of town sites are allocated for development.

iii. Open Spaces / Countryside / Gaps valued open space and landscapes outside of the Built Up Area Boundary are protected. This includes important gaps between settlements and the undeveloped coastline **and the features which provide connectivity between these sites**.

Within in this section of the plan land outside the built up area boundary is addressed. Section 2.37 states in the final sentence that:

'As the population density of Worthing increases the demand for and use of parks and open spaces throughout the borough will increase. The Plan therefore seeks to protect and enhance these assets and seek opportunities to provide new green spaces within development to promote health and wellbeing in our communities.'

We encourage WBC to be more confident in its approach by making the following amendments:

'As the population density of Worthing increases the demand for and use of parks and open spaces throughout the borough will increase. The Plan ~~therefore seeks to~~ will protect and enhance these assets and seek opportunities to provide new green spaces within development to promote health and wellbeing in our communities.'

Section 2.42 would benefit from a positive approach to the protection of the natural environment. We propose the following amendment, in light of section 170d of the NPPF 2018 which clearly sets out the need to deliver net gains for biodiversity:

Outside of the National Park, there are small pockets of countryside that represent a very small and finite resource that is valued for its open space, respite from intense urban activity, and intrinsic character. Therefore the countryside should be protected and ~~where possible~~ enhanced, particularly in terms of the additional benefits it can offer through agriculture, green infrastructure (for example to biodiversity and flood management/storage) and informal recreation such as cycling, walking and horse related activity. Given the limited amount of countryside in Worthing, it is important that the few uses that may be allowed in the

countryside genuinely require a countryside location; cannot be located within the Built Up Area Boundary and maintain its rural character.

SP4 Countryside and undeveloped Coast

Having considered policy SP4, SWT propose the following amendments to bring it in line with paragraphs 118b and 170 of the NPPF.

- a) Outside of the Built Up Area Boundary land will be defined as 'countryside and undeveloped coast'.*
- b) Development in the countryside will be permitted, where a countryside location is essential to the proposed use, it cannot be located within the Built Up Area Boundary, and it maintains its character **and function for natural resources**.*
- c) Development to support recreation uses on the coast will normally be permitted subject to:
 - i. built facilities being located within the adjacent Built Up Area Boundary;
 - ii. the need to maintain and improve sea defences.*
- d) Any development in the countryside and undeveloped coast should not result in a level of activity that has an adverse impact on the character **or biodiversity** of the area.*
- e) Improvements to green infrastructure, including **but not restricted to** enhanced pedestrian, cycle, equestrian access, and better access for those with mobility difficulties will be supported ~~where appropriate~~.*
- f) The setting of the South Downs National Park and the Designated International Dark Skies Reserve must be respected and opportunities to improve access to the National Park will be sought through joint working with other organisations including the Park Authority West Sussex County Council, Highways England and landowners.*

SP5 Local Green Gaps

We strongly support the inclusion of a strategic gaps policy, however we are disappointed that there is no acknowledgement within the policy or supporting text of the roles that these gaps play in terms of natural capital provision and green infrastructure (GI).

The 2018NPPF states in paragraph 171 that '*plans should: ...take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries*'. Similarly in paragraph 174 that '*To protect and enhance biodiversity and geodiversity, plans should: promote the conservation, restoration and enhancement of priority habitats, ecological networks...*'

Additionally, paragraph 118 of the NPPF states that '*Planning policies and decisions should:... recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production*'. We therefore recommend that policy SP5 is expanded to demonstrate the true value of this undeveloped land as follows:

'The four areas listed below are designated as Local Green Gaps between the settlements of Worthing & Ferring and Worthing & Sompting/Lancing, and will be protected in order to retain the separate identities and character of these settlements. Within these **Gaps** ~~areas~~ any development **will be carefully controlled and development will only be permitted in exceptional circumstances** and must be consistent with other policies of this plan, ~~and~~. **Development must not ensure** (individually or cumulatively)

- **it does not** lead to the coalescence of settlements:
- **it is unobtrusive and does not detract from the openness of the area**

- It conserves and enhances the benefits and services derived from the area's Natural Capital
- It conserves and enhances the area as part of a cohesive green infrastructure network...'

- Goring-Ferring Gap;
- Chatsmore Farm;
- Brooklands Recreation Area and abutting allotments; and
- Land east of proposed development (site A3) at Upper Brighton Road.

SP6 Local Green Space

Section 2.72 should be clarified as we understand that it was not a Sussex Biodiversity Record Centre officer that undertook the surveys, but the Sussex Local Wildlife Sites Initiative officer, who works for a broad partnership of local authorities.

We are supportive of the designation of Goring-Ferring Gap, Chatsmore Farm and Brooklands Recreation Area as Local Green Spaces. We continue to encourage the council to consider the value these sites can deliver for biodiversity and therefore support efforts to consider the suitability of these for designation as Local Wildlife Sites. Further to this, the sites should be managed positively in the future to ensure their potential to deliver towards a coherent ecological network (174(b) NPPF 2018).

In relation to the policy we seek clarity on the term '*reclamation*' used in bullet point h). While we think we understand the drive of this bullet point perhaps the term *reclamation* would be benefit from being replaced with the term '*management*'.

Part 3 - Sites

We have taken a broad look at the allocations within the plan and wish to make some overarching comments.

SWT recognise that each site allocation explains the site and potential constraints. What we are unclear of, is the degree of weight which will be given to the section referred to as 'site requirements'. Are these considered to be clear policy requirements and must be delivered as part of the application? Given the relatively small number of allocations in the Local Plan, we encourage the council to consider the value of a specific policy for each allocation. This may be easily achieved by inserting an overarching statement within each allocation which reads:

'Development coming forward within each allocation will be expected to deliver the site requirements as a minimum'

If WBC do not feel this is necessary and the approach is to ensure the current plan policies capture all proposed requirements, we ask the council to consider if the environmental policies within the plan are strong enough to capture the requirements of the allocations.

We recognise that a significant proportion of the allocations are brownfield sites within the town centre and they currently have no commitments to deliver biodiversity net gains or high quality GI in the allocation requirements. We really encourage the council to see the potential of these sites to deliver exemplar green infrastructure that is incredibly visible/accessible to the community. We know that the council is committed to delivering a green infrastructure strategy and really encourage the council to identify within it how allocations can play their part in delivering a resilient network (171, NPPF 2018).

Allocation 1 Caravan Club

Having looked at this site in conjunction with other allocations within this plan, our thoughts turn to the potential cumulative impact on the Local Wildlife Site. This pressure may come from the development and take a variety of forms for example recreational pressure or pressure from domestic pets (predation). Therefore we encourage the council to consider a masterplan for the potential sites in this area, so that if the sites progress the cumulative impact has been considered and avoided where possible.

The woodland directly to the north of the revised Caravan site is ancient woodland and is part of a wider complex of ancient woodland and woodland pasture/parkland priority habitat. The site description for this allocation talks about the caravan club using the north of the site, we are unclear whether the caravan operations will be the same capacity in a smaller area, and if so ask if the impact on the woodland has been considered?

As mentioned above we are unclear to the weight the site requirement section holds. However we feel as a minimum the following points should be captured within it:

- **A master plan for the site and surrounding allocations should inform the design and layout to avoid impacts on the LWS.**
- **This development should be informed by up to date ecological information**
- **Biodiversity net gains and high quality Green Infrastructure should be achieved by any development on the site.**

Allocation 2 Land West of Fulbeck Avenue

We do not support the development of a Greenfield site, however we do recognise the land sits next to another area that has been developed. Our records show that the site does have priority habitat of deciduous woodland upon it and it is clearly functionally linked with the adjacent LWS. As stated in our comments for (A1) we would encourage the council to consider a masterplan for the potential sites in this area, so that if the sites progress the cumulative impact on the LWS have been considered.

We also encourage the council to consider strengthening the requirement for the stream in relation to SuDS and runoff from the developed areas.

As stated previously we are unclear to the weight the site requirement section holds. However we feel as a minimum the following points should be captured within it:

- **A master plan for the site and surrounding allocations should inform the design, layout to avoid impacts on the LWS.**
- **This development should be informed by up to date ecological information**
- **Biodiversity net gains and high quality Green Infrastructure should be achieved by any development.**

Allocation 3 Land at Upper Brighton Road

For this Greenfield allocation we think that it is important for the site constraints to recognise that the Teville stream (a chalk stream) runs through field A and all the 'drains' to the east are designated chalk streams. Chalk streams are a priority habitat that must be protected and enhanced.

We note the development requirements reference the need to retain and enhance existing waterbodies and or create new wetland habitat. We ask the council to be aware of the Ouse and Adur Rivers Trust's (OARTs) project for habitat creation and ensure that the development requirements capture criteria that maybe needed, as per allocation 4 (A4).

SWT is pleased to see the requirements for this allocation do capture opportunities to retain and enhance some of the habitats on site. As stated previously we are unclear to the weight the site requirement section holds. However we feel as a minimum the following points should be added to the existing requirements:

- **This development should be informed by up to date ecological information**
- **Biodiversity net gains and high quality Green Infrastructure should be achieved by any development on the site.**

Allocation 4 Decoy Farm

With this allocation we note that the indicative capacity states a minimum of for the commercial space, this term has not been used in the other allocations and we seek clarity on its use here.

The policy states that the Teville stream runs to the west of the site and acknowledges in the requirements that it must have regard and facilitate the rerouting of the stream. We suggest that the council also ensure that the requirements for the allocation stipulate the need to for the development to be designed sensitively in relation to these enhancements.

With regards to the allocation requirements we note that the final requirement is to deliver net gains to biodiversity through enhancement of valued habits. We support the need to deliver net gains as this is clearly in line with the NPPF. SWT also feel that its inclusion within this policy means that it can be a requirements that is deliverable across other allocations.

However we feel as a minimum the following points should be added to the existing requirements:

- **This development should be informed by up to date ecological information**
- **Development on this site development will be designed sensitively in relation to the enhancements of the Teville Stream.**

Allocation 5 Teville Gate

We are pleased to see WBC considering brownfield sites. However we are disappointed the allocation requirements does not stipulate the need to integrate biodiversity within the development (175d, NPPF 2018). We encourage the council to ensure these site showcase opportunities to integrate biodiversity and deliver high quality green infrastructure (175d, NPPF 2018). We note that requirements for this site do reference SuDS, this could include green roofs and rain gardens.

As stated previously we are unclear to the weight the site requirement section holds. However we feel as a minimum the following points should be added to the existing requirements:

- **This development should be informed by up to date ecological information**
- **Biodiversity net gains and high quality Green Infrastructure should be achieved by any development on site.**

Allocation 6 Union Place

We are pleased to see WBC considering brownfield sites. However we are disappointed the allocation requirements does not stipulate need to integrate biodiversity within the development (175d, NPPF 2018). We encourage the council to ensure these site showcase opportunities to integrate biodiversity and deliver high quality green infrastructure.

As stated previously we are unclear to the weight the site requirement section holds. However we feel as a minimum the following points should be added to the existing requirements:

- **This development should be informed by up to date ecological information**
- **Biodiversity net gains and high quality Green Infrastructure should be achieved by any development on site.**

Allocation 7 Grafton Site, Marine Parade

We are pleased to see WBC considering brownfield sites. However we are disappointed the allocation requirements does not stipulate need to integrate biodiversity within the development (175 (d) NPPF 2018). We encourage the council to ensure these site showcase opportunities to integrate biodiversity and deliver high quality green infrastructure.

As stated previously we are unclear to the weight the site requirement section holds. However we feel as a minimum the following points should be added to the existing requirements:

- **This development should be informed by up to date ecological information**
- **Biodiversity net gains and high quality Green Infrastructure should be achieved by any development on site.**

Allocation 8 Civic Centre Car Park

We are pleased to see WBC considering brownfield sites. However we are disappointed the allocation requirements does not stipulate need to integrate biodiversity within the development (175 (d) NPPF 2018). We encourage the council to ensure these site showcase opportunities to integrate biodiversity and deliver high quality green infrastructure.

As stated previously we are unclear to the weight the site requirement section holds. However we feel as a minimum the following points should be added to the existing requirements:

- **This development should be informed by up to date ecological information**
- **Biodiversity net gains and high quality Green Infrastructure should be achieved by any development on site.**

Areas of Change

We understand from the explanation within the draft local plan (3.6/3.7) that there is insufficient certainty over delivery on these sites. However we encourage WBC to consider the potential to deliver high quality green infrastructure and net gains through development on these sites. The development requirements for each area of change currently propose some biodiversity enhancements. However given the acknowledged uncertainty of these areas means we cannot predict when they will come forward for development. As a result we suggest that the development requirements section for this area stipulate the need for development to be informed by up to date ecological information.

In addition where these areas are in close proximity to one another for example AOC4-6 we would encourage WBC to adopt a progressive approach and consider a Green Infrastructure master plan for the area as the Boroughs GI strategy progresses.

Omission Site 1 Land East of Titnore Lane

We support WBC conclusion that this site is not suitable for development due to impacts on a LWS, ancient woodland and the supporting complex.

We support the comment at the end of the plan relating to the change in the BUAB to ensure the land in question would no longer fall within the area illustrated as being the West Durrington Strategic Development.

Omission Site 2 Land North of Beeches Avenue and Omission Site 3 Worthing United Football Club

We note that these sites were not excluded on the grounds of biodiversity impacts. However as green sites on the edge of town we feel their ability to deliver net gains would need to be carefully considered as they are directly adjacent to each other. If the WBC find themselves in the position that both sites were put forward there should be cohesion in their design to ensure the maximum benefit for the environment.

Part 4 - Core Policies

CP2 Density

We are pleased to see section 4.29 of the supporting text for this policy acknowledging that even though national standards to not apply for external space, WBC recognise its importance for occupiers. External space can offer incredibly important opportunities in delivering green infrastructure, which can benefit health and wellbeing, climate change resilience as well as biodiversity. We support the council in ensuring the importance they place on external space is translated into wording with policy CP2 in bullet point e, however we seek clarity on what the councils local standards for external space are.

CP5 Quality of Built Environment

The draft local plan highlights in section 4.49 that 76% of respondents to the issues and options paper agreed that inappropriate development of residential gardens should be resisted. Given that the NPPF 2018 has carried this requirement over from the 2012 NPPF we feel this needs to be suitably reflected in the Worthing Local Plan. Section 4.57 covers development of private residential gardens. We understand that in a borough as constrained as Worthing, there is a need to consider each application on its own merit. However we feel that this paragraph is not in line with the NPPF 2018 and should set out clearly that the inappropriate development of residential gardens will be resisted.

We therefore propose the following modification to the supporting text in section 4.57:

*Private residential gardens within the Built Up Area are now excluded from the definition of previously developed land, **Inappropriate development of residential gardens will be resisted**, but their development in some circumstances may be acceptable. Applications for development of private residential gardens will be considered carefully and each case will be determined on its own merits. A range of issues, including the size and shape of the garden, impact on neighbouring dwellings, biodiversity, density, and the character of the area, will all be taken into account.*

As we progress to the policy for the built environment (CP5) we acknowledge and support bullet (viii) that recognises the importance of respecting and enhancing natural features and biodiversity. To ensure the wording adequate reflects the ethos of the NPPF (2018) section 170(d) we propose the following modifications to policy CP5 bullet point viii:

~~respect~~ **protect** the existing natural features of the site, including landform, trees and biodiversity and contribute positively to biodiversity **by delivering net gains**;

CP7 Healthy Communities

We would encourage this policy to recognise the importance of the natural environment and biodiversity more explicitly. We therefore propose the following modification to bullet point (ai)

- i. promoting healthy lifestyles, such as through improvements in the quality and accessibility of recreation opportunities, **quality and access to nature and open space** and the enhancement and accessibility of safe active travel routes to enable exercise and physical activity as part of everyday life;

CP8 Open Space, recreation and Leisure

The supporting text for this policy acknowledges in section 4.99 that there are deficiencies for a number of facilities including natural/semi natural and amenity green space. Therefore we recommend that the policy wording should seek to reflect the need to meet these deficiencies. We proposed the following modification to CP8 to be inserted as bullet point (d):

(d) Proposals should seek to address the deficiencies identified in by Worthing Borough Council for Open Space, Recreation and Leisure Study.

CP10 Delivering Infrastructure

We support the recognition in section 4.113 that green infrastructure is included in the council's requirements for infrastructure. However we recommend a modification is made to bullet point (b) of the policy, to replace development with the term communities:

*The Council will work with partners including infrastructure and service providers and stakeholders to ensure that the necessary physical, economic, social and environmental infrastructure is provided to support ~~development~~ **communities**.*

CP19 Biodiversity

We support section 4.243 where WBC acknowledges that it is important to conserve biodiversity outside of protected sites. Further to this the acknowledged need to deliver biodiversity nets gains in section 4.244 will be a welcome translation into policy.

We seek clarity on section 2.245 where the second sentence says:

It will also work towards increasing appropriate species of woodland cover for the benefit of people and wildlife as well as to improve landscape quality.

We are unclear what the WLP is trying to say here, but suggest that perhaps the word species simply needs replacing with the term types.

*It will also work towards increasing appropriate ~~species~~ **types** of woodland cover for the benefit of people and wildlife as well as to improve landscape quality.*

In relation to this sentence, although we support the suggestion of an increase of woodland cover, this must be informed by appropriate information that ensures other valued habitats suitable to the area are also considered. For example the replacement of unimproved/chalk grassland with trees would not be advised.

We support section 4.246 which references the boroughs ancient woodland and veteran tree resources. We note in Worthing Borough Councils Annual Monitoring report from the Sussex Biodiversity Record Centre that the approval of a planning application during 2017/2018 led to ancient woodland being infringed. Therefore we support the final sentence of this section which says that development that would result in the loss or deterioration of ancient woodland will not be permitted.

We would like to state that we are supportive of policy CP19 Biodiversity. However we have made a small number of modifications to ensure the policy reflects the ethos of the NPPF 2018 and to enable the effective understanding and delivery of the policy at development management stage.

We would especially like to highlight our **strong support** for the policy including the need for up to date ecological information, in our amendments we have recommended that this is moved to the top of the policy to make it clear from the start that applications should be supported by this information.

a) Planning applications should be supported by relevant environmental information, which is informed by appropriate up-to-date ecological information, prior to determination.

~~a~~**b) All development should ensure the protection, conservation, and where possible, enhancement of biodiversity, including:**

- Nationally and locally designated sites
- Marine habitats and other Biodiversity Action Plan (BAP) priority habitats ~~areas,~~
- Protected and priority species
- Biodiversity Opportunity Areas (BOAs)
- Wildlife corridors and stepping stones, ~~and~~

If significant harm cannot be avoided (by locating development on an alternative site with less harmful impacts **or through design**), then such harm should be adequately mitigated. Where it cannot be adequately mitigated then such harm must be compensated for. Where it cannot be compensated for, then planning permission should be refused. This process is ~~referred to below~~ **also known** as the mitigation hierarchy.

~~b~~**c) Proposed developments which would adversely affect a Site of Special Scientific Interest (SSSIs) (individually or cumulatively) will not normally be permitted. Exceptions will only be made where the benefits of the development on the particular site clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts. Where an exception is considered the mitigation hierarchy will apply.**

~~e~~**d) Proposals for development in, or likely to have an adverse effect (directly or indirectly) on a Local Wildlife Site, (including ancient woodlands, ancient/veteran trees, wildlife corridors, and stepping stones) or Local Geological Site will not be permitted unless it can be demonstrated that reasons for the proposal outweigh the need to safeguard the nature conservation value of the site/feature. Where an exception is considered the mitigation hierarchy will apply.**

e) Proposals for development that is likely to have an adverse effect on priority habitat or species will not be permitted unless it can be demonstrated that reasons for the proposal outweigh the need to safeguard the nature conservation value of the site/feature. Where an exception is considered the mitigation hierarchy will apply.

~~d~~**f) Where relevant, new development adjacent to the coast will have to demonstrate how it is addressing the issue of coastal squeeze.**

~~e~~**g) Assessment must be informed by appropriate up-to-date ecological information.**

~~f~~**g) Major Development should take account of and incorporate **existing and new** biodiversity features at the design stage and where possible environmental **biodiversity** net gains should be achieved.**

g/h) Tree planting is encouraged to improve the quality of the local environment. Tree Preservation Orders will be made to ensure that healthy locally important trees that make a positive contribution to the street scene are protected.

h/i) Where appropriate, the Council will use planning conditions or obligations to provide appropriate enhancement and site management measures, and where impacts are unavoidable, mitigation or compensatory measures.

CP20 Green Infrastructure

We would like to state that we are supportive of policy CP20 Green Infrastructure and of WBC commitment within the policy to deliver a green infrastructure strategy. By doing this and recognising its need to inform development across the borough and beyond its boundaries, it will focus the council on producing a document that is both robust in its evidence base and progressive in its approach to delivering GI through a heavily populated area.

The Sussex Wildlife Trust have previously corresponded with WBC and encouraged the council to ensure that Green infrastructure is strongly embedded in the Local Plan and associated documents such as the Infrastructure Development Plan.

We have made a small number of modifications to ensure the policy reflects the ethos of the NPPF 2018 and to enable the effective understanding and delivery of the policy at development management stage:

*a)The Council will work with relevant partners and developers to facilitate the creation of an integrated network of green infrastructure within and beyond Worthing. A Green Infrastructure Strategy will be produced by the Council and when in place, developments will be expected to comply with it. Until such time, applicants are encouraged to refer to existing information and records on green infrastructure assets **to inform how their development can protect, conserve, enhance and deliver Green/Blue Infrastructure across the borough.***

*b)All ~~major~~ developments will need to demonstrate how they will contribute to the implementation of the Green/**Blue** Infrastructure Strategy both at site level and with regard to the wider green infrastructure network. Opportunities should be taken to incorporate elements of green/**blue** infrastructure to create, protect, enhance and manage green infrastructure assets and/or networks. This should be based on up to date ecological evidence on, and information about, green/**blue** infrastructure assets and maximise multi-functional benefits.*

*c)Arrangements and funding for the management and maintenance of green infrastructure over the long term should be identified **and implemented**. Where appropriate, the Council will seek to secure this via planning obligations.*

CP21Flood Risk and Sustainable Drainage

We are supportive of bullet point (a) within the policy that recognises the importance and benefits of natural flood management. In addition we welcome bullet point (d) and the need to take opportunities to increase biodiversity through the use of Sustainable Urban Drainage Systems (SuDS). However in relation to this point we question whether the policy would benefit from the inclusion of wording which highlights the problems posed by invasive species

CP23 Pollution and Contamination

We are supportive of the fact that the policy has given recognition to the impact of pollution and contamination on nature conservation interest in bullet point (a). However we would like to raise the

specific issue of light pollution. Does WBC think that the policy should include a specific reference to light pollution, given that there are proposed changes to the BUAB and they are adjacent to the SDNP, which has a dark skies policy? This is also referenced in 180(c) of the NPPF 2018.

CP24 Transport and Connectivity.

We encourage the council to pursue a policy that enables the effective integration of sustainable transport across the Borough.

We note within the policy b (vi) states support for the improvements to the road network including the A259 and A27. We are concerned that this bullet point is supportive when we are currently unclear what the improvements fully entail.

CP25 Digital Infrastructure

Having considered the proposed policy wording we encourage the council to be more direct in its approach to restoration. We therefore make the proposed modifications to bullet point (d):

d) Conditions or planning obligations ~~may~~ will be used to secure landscaping as well as restoration of the site if operation ceases.

We hope that WBC find the Sussex Wildlife Trust comments constructive as the draft plan moves forward. If you wish to discuss any of our comments further please do get in contact.

Yours sincerely,

Laura Brook
Conservation Officer
Sussex Wildlife Trust

Draft Local Plan for Worthing Consultation Document October 2018 Comments Form

**This consultation runs from Wednesday 31st October
 to 5pm on Wednesday 12th December 2018**

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


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

Phone: 01273 263000

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

Section A - Contact Details

First name	Craig		
Last name	Noel		
Organisation	Strutt & Parker for the Sompting Estate Trustees		
Address line 1	201 High St		
Address line 2			
Town	Lewes		
Postcode	BN7 2NR	Telephone	01273 407045
Email address	Craig.noel@struttandparker.com		

Name	Craig Noel MRTPI	Date	XX/12/18
Signed			

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.

Note: Unless you request otherwise (by putting a cross in the box to the right), all respondents will be added to the Worthing Local Plan consultee database and will be notified at all subsequent stages of Local Plan progression.	No: please don't add me	
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In addition, if you would like to subscribe to the Worthing Planning Policy Newsletter (which covers a wide range of Planning Policy issues) then please put a cross in this box:	x
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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. However, contact details will not be published. Unfortunately, we cannot accept or report confidential or anonymous responses. Further information about how personal information is processed can be found on the Council's website in the Planning Policy Privacy Notice: <https://www.adur-worthing.gov.uk/planning-policy/privacy-notice/> All data will be stored securely in line with the GDPR.

SECTION B – COMMENTS

As set out below, this consultation document is formed of four parts. It would be helpful if you provide your comments under the relevant sections together with relevant policy number, paragraph and page numbers. However, if your comments are more general then your comments can be inserted in the box below.

GENERAL COMMENTS

The land subject to Site Allocation A3 lies within the ownership of Sompting Estate. It is also subject to a development agreement with Persimmon Homes. We understand that Persimmon will be responding separately in relation to this site. Our comments submitted on behalf of the landowner relate solely to the boundaries of the site allocation area as indicated on the OS extract reproduced on Page 48 of the draft Local Plan.

This box is a fixed size - please continue on separate sheet(s) at the end if necessary

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 1 - INTRODUCTION AND CONTEXT

(this 'part' includes characteristics of the borough/issues and challenges and vision & strategic objectives)

PART 2 - SPATIAL STRATEGY

(this 'part' sets out the proposed spatial strategy (what development and where) and the policies to deliver it)

We note that Policy SP5 concerns Local Green Gaps and these are identified on Figure 2. Sompting Estate own land on the east side of Worthing which appears to be subject to Policy SP5 as indicated on Figure 2. The comment here is in relation to the representation of policy on the plan included in support of Site Allocation A3. It is very difficult to see from Figure 2 the boundary of the Local Green Gap in this location. We believe that it will improve the clarity of the Plan if boundaries were identified on the inset plan supporting allocation A3.

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 3 - DEVELOPMENT SITES

(this 'part' includes details of the proposed future development sites)

Site A3 - It is noted that in the Site Constraints section reference is made to an area hatched black on the plan as constituting the easement strip for the Rampion offshore windfarm cabling. In turn, the western most extent of the easement represents the eastern boundary of site sub parcels A and B.

The Estate has been in discussion with Rampion representatives about the extent of the easement. By way of background, the additional width of the easement to the east of Parcel B reflects the technique originally employed by Rampion during the laying of the cabling, which involved tunnelling beneath the A27 rather than a cut and cover process. The additional width of the easement reflected the land take involved in delivering that operation.

However, the Estate has been discussing future easement requirements and Rampion has indicated that the width of the easement north of Upper Brighton Road can be reduced to reflect likely future maintenance requirements. However, as part of that agreement, the easement south of the road that bounds Parcel A is likely to widen slightly. Attached to these representations is a revised plan indicating the new intended easement arrangements. Given that it is the extent of the easement that defines the eastern boundaries of Plots A and B, it would seem logical for those boundaries to be adjusted to reflect the revised easement arrangements. These are now agreed with Rampion's agent.

It should be noted that the easement strips will not be suitable for tree planting. For this reason the requirement in relation to Parcel B that the proposals should include "*a block of woodland planting within the eastern area*" should be deleted.

PART 4 CORE POLICIES - HOMES AND NEIGHBOURHOODS (Policies CPI – CP6)

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 4 CORE POLICIES – SUSTAINABLE COMMUNITIES
(Policies CP7 – CP10)

PART 4 CORE POLICIES – LOCAL ECONOMY
(Policies CP11 – CP14)

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

**PART 4 CORE POLICIES – HISTORIC ENVIRONMENT
(Policies CPI5 – CPI6)**

**PART 4 CORE POLICIES – ENVIRONMENT AND CLIMATE CHANGE
(Policies CPI7 – CP23)**

This box is a fixed size - please continue on separate sheet(s) at the end if necessary

**PART 4 CORE POLICIES – TRANSPORT AND CONNECTIVITY
(Policies CP24 – CP25)**

This box will grow to allow you to add extra comments

**Additional comments continuation sheet(s) -
please mark clearly which section your comments carry on from**

Part 3 Comments (cont..)

Site A3 (cont..)

Provision should be made for the maintenance of suitable agricultural access to sustain future farming activity in south Sompting. Sompting Estate's private road access from the A27 through Lower Lambleys Lane, crosses Upper Brighton Road here to access the west end of Church Farm. This access, although infrequently used, is very important at harvest time and when bulky materials such as fertiliser are delivered. It also avoids the need for large farm vehicles to navigate West Street. This access may also support future cropping diversifications.

To maintain farming activities in this area and to manage farm traffic effectively, it will be necessary for the Estate to retain and (where possible) improve the design of the farm entrance and access alongside land use changes or landscaping proposed. A well designed and signed farm entrance will make clear to people travelling across the Local Green Gap in this area that they are entering a new character area around the Sompting Village Conservation Area, with an identity closely connected with its agricultural roots.

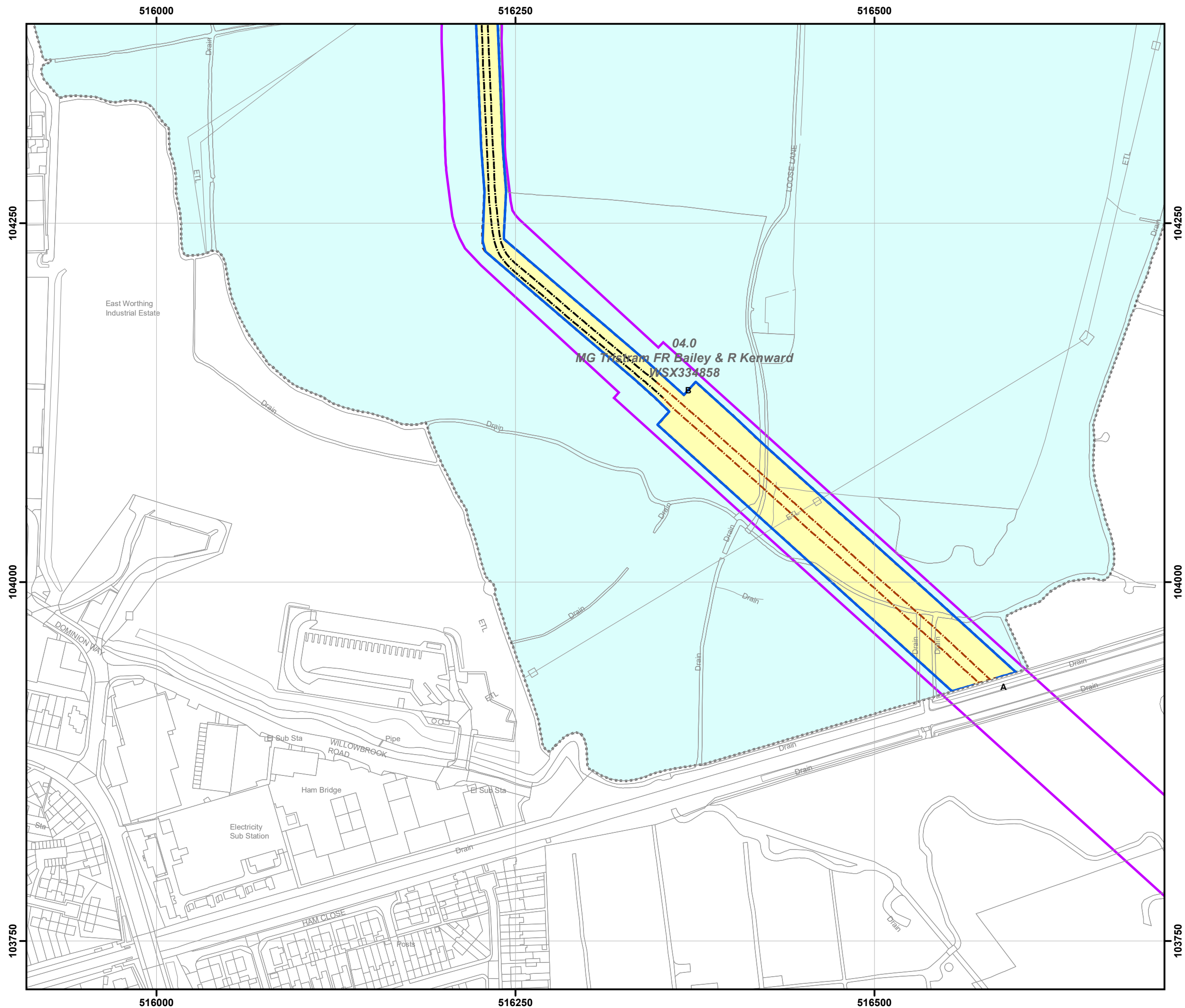
Site A4 – the draft plan allocates land at Decoy Farm for employment purposes. It is appreciated that development of its land has been a long standing ambition of Worthing Borough, and that the site which falls within the existing built up area boundary is suitable in principle for employment development.

We note that the development requirements listed in the policy include the need to '*have regard to and help facilitate and deliver plans to re-route the Teville stream and deliver a public right of way across the Local Green Gap*'. In addition, the proposal is to '*deliver a net gain in biodiversity through enhancement of valued habitats*'.



The Estate controls the land east of the proposed allocation that sits within the Local Green Gap. The Estate has publicly expressed its willingness to cooperate over the delivery of routes within this area that improve public access to countryside. Indeed, there are permissive routes which are to be delivered in association with the EPIC project in the immediate area, associated with works to the Teville stream.

A possible connection between Decoy Farm and these routes is noted as a policy aspiration.




It is noted that the policy does not promote a public connection between the Decoy Farm site and Dominion Way / Willowbrook Road. It is assumed therefore it is not Worthing Borough policy to look to secure a footpath connection between those roads and any routes that may be provided within the Local Green Gap. It therefore holds that any such connection must not be a requirement on the Estate in association with any other development proposals.



Legend

-  Proposed Demised Land
 Cable must sit within this Lease Area

**As-Laid Data Update Received from
Lukasz Gajda 16.08.2018**

-  HDD Drill Cable Route
 As-laid Cable Route
 DCO Boundary

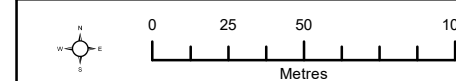
Owner
MG Tristram, FR Bailey and R Kenward

Signature:

Date:

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Ordnance Survey 0100031673

The Rampion Offshore Wind Farm Order 2014
Article 31



Client:



Title: MG Tristram, FR Bailey and R Kenward
As-Laid Cable Route and Lease Area Update
Sheet 1 of 3



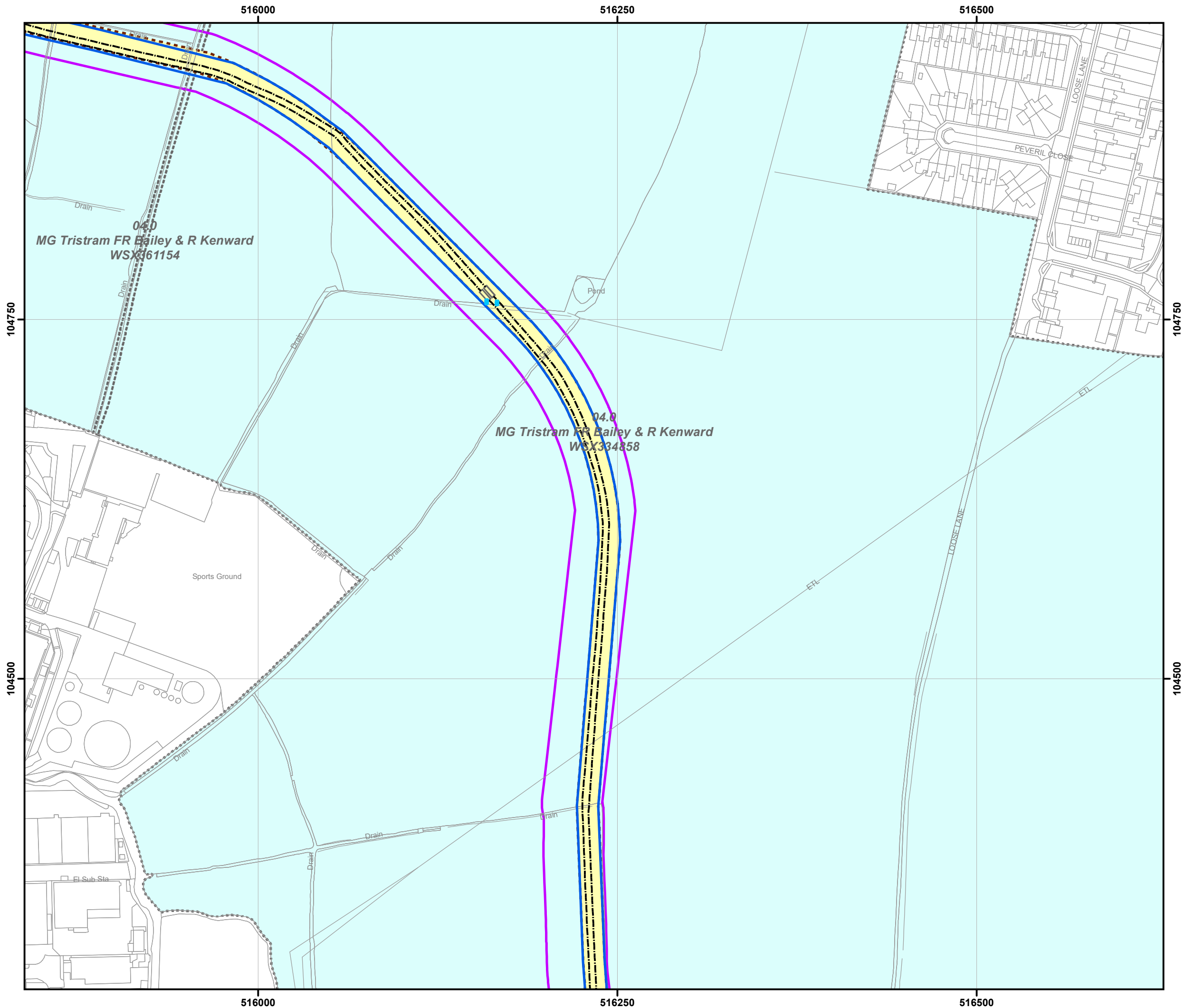
Drawing Ref:
MG Tristram FR Bailey & R Kenward LeaseUpdate 12102018

Revision: 1

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Paper Size: A3

Date: 15/10/2018



Legend

- Proposed Demised Land
- Cable must sit within this Lease Area
- As-laid Cable Route
- Link Box
- Joint Bay
- DCO Boundary

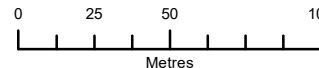

As-Laid Data Update Received from
Lukasz Gajda 16.08.2018


Owner
MG Tristram, FR Bailey and R Kenward
Signature:

Date:


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The Rampion Offshore Wind Farm Order 2014
Article 31

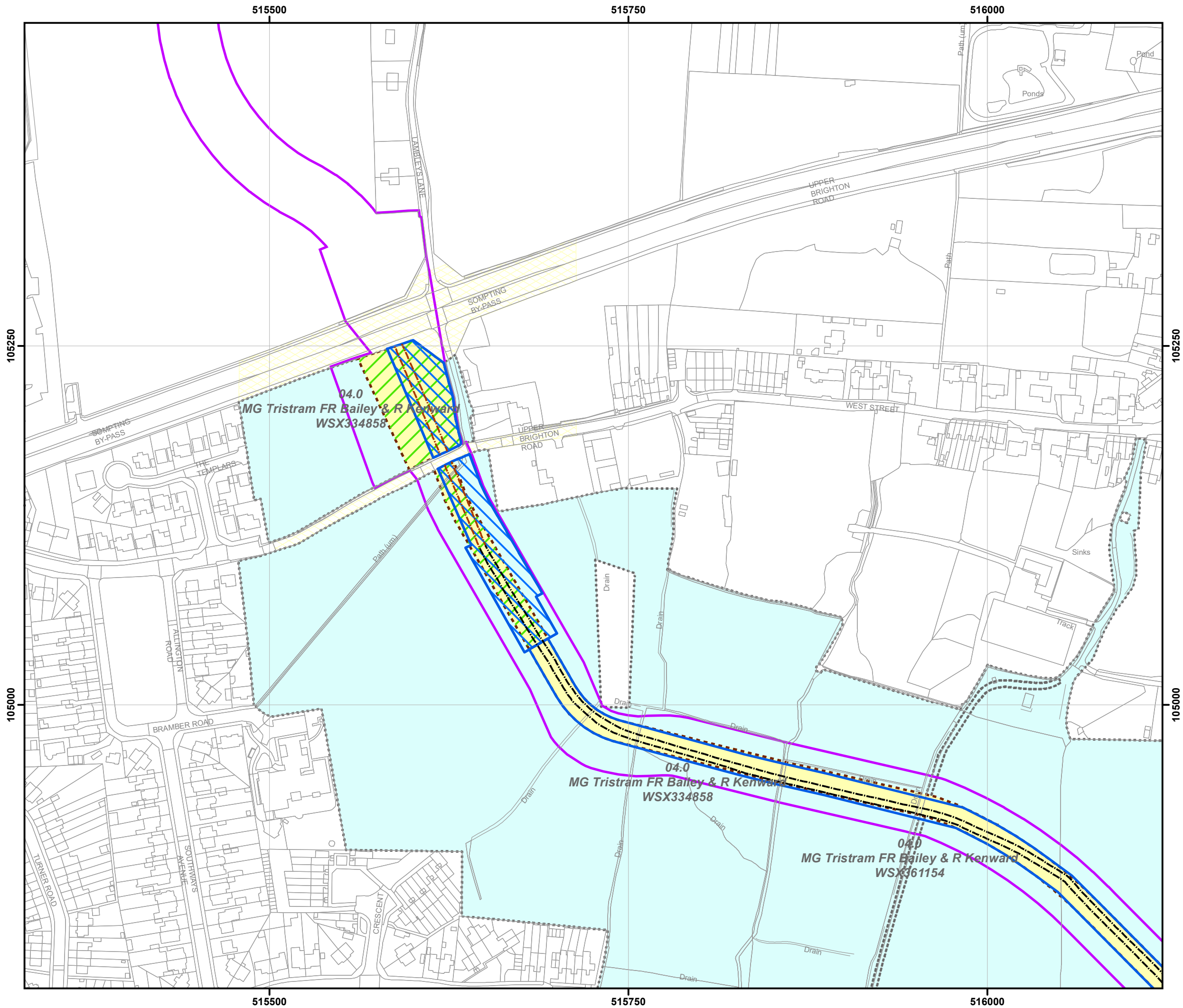


Client: 

Title: MG Tristram, FR Bailey and R Kenward
As-Laid Cable Route and Lease Area Update
Sheet 2 of 3

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Drawing Ref: MG Tristram FR Bailey & R Kenward LeaseUpdate 12102018		Revision: 1
1:2,500	Paper Size: A3	Date: 15/10/2018



Legend

- Proposed Demised Land
- Cable must sit within this Lease Area
- Original Lease Extent Used for Updated Demised Land Area: 5975 m2
- Updated Demised Land Area: 5975 m2

**As-Laid Data Update Received from
Lukasz Gajda 16.08.2018**

- HDD Drill Cable Route
- As-laid Cable Route
- DCO Boundary
- Adopted Highways

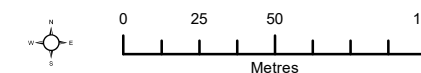
Owner
MG Tristram, FR Bailey and R Kenward

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Date:

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**The Rampion Offshore Wind Farm Order 2014
Article 31**



Client:

Title: MG Tristram, FR Bailey and R Kenward
As-Laid Cable Route and Lease Area Update
Sheet 3 of 3

**FISHER GERMAN
PRIESTNER LIMITED**
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Drawing Ref:
MG Tristram FR Bailey & R Kenward LeaseUpdate 12102018

Revision: 1

1:2,500

Paper Size: A3

Date: 15/10/2018

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	Michael Lavender
Organisation	Adur & Worthing Councils

General comments

DEFRA's noise action plans and the Planning Noise Advice Document - Sussex are living documents and as such are subject to change as and when new research or guidance become available.

Consultaion on new Noise Action Plan's are currently taking place and I would therefore recommend that you refer to the latest Noise Action Plan in the local plan document rather than a specific Noise Action Plan that will be superseded. The one referenced has already been superseded in 2012.

There are also plans in place to update the Planning Noise Advice Document - Sussex. To include; new guidance on good acoustic design; ventilation and overheating strategies for development that has to be protected from noise; World Health Organisation Noise Guidelines for the European Region; the Institute of Acoustics guidance on what should be included in a noise report; and finally, other British Standards referred to in the current document that have since been superseded by new standards will also be updated.

I would request that the local plan wording in this paragraph be tightened up to require developers to have regards to the Planning Noise Advice Document - Sussex before submitting planning applications where noise will have to be considered.



REFERENCE

DWLP-M -89

Date received: 12/12/2018

City Development and
Regeneration
First Floor, Hove Town Hall
Hove
BN3 3BQ

Mr Ian Moody
Planning Policy Manager
Planning Policy Team
Worthing Borough Council

Date: 12 December 2018
Phone: (01273) 292502
e-mail: planningpolicy@brighton-hove.gov.uk

Dear Ian,

Worthing Borough Council Local Plan Regulation 18 Consultation Brighton & Hove City Council Response

Thank you for the opportunity to comment on the Worthing Draft Local Plan consultation. We note this is a Regulation 18 consultation on the Local Plan and the intention is to move forward to Regulation 19 later next year. This response has been drafted on that basis.

Brighton and Hove City Council (BHCC) is committed to engaging positively with its neighbouring local planning authorities to address strategic planning matters. This is evidenced by ongoing working relationships established through the West Sussex and Greater Brighton Strategic Planning Board (established in 2013) which represents the local planning authorities of Adur, Arun, Brighton & Hove, Chichester, Crawley, Horsham, Lewes, Mid Sussex and Worthing, together with West Sussex County Council and the South Downs National Park Authority. The purpose of the Board is to identify and manage the spatial planning issues that impact on more than one local planning authority area and support better integration and alignment of strategic spatial and investment priorities.

The Board has agreed the preparation of Local Strategic Statement 3; the purpose of which is to explore options for meeting the area's unmet needs for housing, employment and to identify the strategic infrastructure required to support planned levels of growth. A programme of work has been agreed including the necessary commissioning briefs to ensure a consistent evidence base. In line with the requirements of the NPPF, this joint work demonstrates the level of commitment on behalf of the constituent local planning authorities to working together collaboratively.

The City Council welcomes the consultation on the draft Worthing Local Plan and notes that Worthing is facing similar issues and challenges to Brighton & Hove particularly in terms of limited land availability, infrastructure constraints, areas of flood risk and the need to protect and conserve significant heritage assets and high quality landscapes. In terms of taking the Worthing Local Plan forward, we also note that further work will be undertaken to meet requirements set out within the revised NPPF (2018). In particular the NPPF now requires at para.27 the preparation of statements of common ground.

Constraints, Options and Future Growth

The City Council supports the overall vision and strategy set out in the draft Plan. We acknowledge the challenges and constraints faced by Worthing Borough Council in planning for future growth, with extensive land within the South Downs National Park and/or other designations. We also note the evidence produced so far that has been used to inform the strategy for future growth and to identify key sites and areas of change that will help meet future development needs.

It is noted that Worthing has looked at a range of options in seeking to meet its objectively assessed housing need (which has been assessed as 753 dwellings per annum between 2016 and 2033), including looking at housing potential both within the existing built up area and potential edge of town land release, but that even with the latter, housing delivery is likely to fall significantly short of assessed local need. Brighton & Hove falls within the Coastal Urban Area Housing Market Area (HMA) and Functional Economic Market Area (FEMA) as defined in the 2017 GL Hearn¹ study. The report established that there were close functional relationships across authorities within this HMA. In light of this, and given the constrained land availability across neighbouring authorities, we would urge Worthing to thoroughly consider all reasonable alternatives for meeting projected development needs over the plan period.

It is noted that the draft Plan seeks to deliver a minimum of 4,182 net dwellings over the plan period 2016-2033 (an annual target of 246 dwellings per year). This would be around 25% higher than the target in the adopted Worthing Core Strategy. The City Council welcomes and strongly supports the aim to increase housing supply. Table 1 in the Plan indicates that achieving this target relies on delivery of 837 dwellings on identified SHLAA sites. Of these, 495 dwellings are on sites identified as 'Areas of Change' where the draft Plan (para 2.21) indicates there is less certainty about the likely mix of uses, site capacity and delivery timeframe. To increase the likelihood of meeting the draft Plan housing target, we would encourage the Borough Council to undertake further work to assess the development potential, capacity and deliverability of the sites identified as 'Areas of Change' and the remaining SHLAA sites with the intention of allocating as many as possible of these sites in the Plan before its submission.

We also note that the evidence for the draft Plan (para 2.26) has identified three edge-of-town sites referred to as 'Omission Sites' which have been assessed as potentially suitable for residential development, but are not proposed for allocation due to there being insufficient evidence that identified constraints could be overcome. Again, we would encourage the Borough Council to pursue additional work that may enable these sites to be allocated in the Plan before its submission.

Focus on Urban Areas

We generally support the principle to focus development within the existing built up area, including building at higher densities and making the most efficient and effective use of sites. Given the emphasis within the new NPPF of optimising the use of land through uplift

¹ Defining the HMA and FEMA, February 2017, GL Hearn.

in density, additional sensitivity testing of different urban density options could help to further inform the extent to which this could assist in meeting the Borough's housing needs.

Quality of Built Environment

We support the emphasis on good design and also support the recognition that green infrastructure is an important part of achieving a good quality environment.

Economy

Worthing's policy to promote and enable the continued development of a strong, sustainable and diverse local economy in particular promoting a 'town centre' first approach to new office space and safeguarding existing employment areas is supported. The identification and proposed allocation of Decoy Farm (Policy A4) in the Local Plan is welcomed as the delivery of new employment floorspace at Decoy Farm is recognised in the Local Strategic Statement 2 in terms of its importance to the sub-region for boosting employment opportunities and economic performance.

It is noted that the employment land requirements referred to in the Worthing Local Plan are based on a scenario that provides the most 'realistic' level of population / housing growth (300 dwellings per annum) and is considered to be a scenario that the council considers best reflects that approach being advanced in the Plan. It is recognised that the Borough is constrained in terms of land availability but it will be important to ensure that the Local Plan has identified sufficient employment land to meet the forecast requirements to ensure that the local economy is not constrained and to respond to market signals. Policy SP3 indicates an 'indicative minimum of 50,000 sq metres of B employment floorspace will be provided'. It would be helpful to clarify in the list of sites how much additional office, and in particular industrial floorspace, will be delivered during the Plan period on other in addition to Decoy Farm to meet the forecast needs.

The Greater Brighton City Deal recognises that Worthing has a strong engineering, manufacturing and pharmaceutical base and that there are opportunities for creating an enterprise hub for a developing technology cluster and potential to expand the creative and cultural industries. It would be helpful to see this reflected in the Plan.

Transport and Infrastructure implications

The increased level of development in Worthing is likely to have impacts upon the wider road networks, public transport systems and other infrastructure in the sub-region. It is noted that some of the suggested site allocations include possible mitigation measures and this is supported and welcomed.

I hope you find these comments helpful and we look forward to continuing to work with you in the future on areas of mutual interest.

Yours sincerely,



Sandra Rogers

Planning Manager, Policy, Projects and Heritage Team

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	Mr & Mrs M Dormer
------	-------------------

General comments

As local residents who regularly enjoy walking along the undeveloped section of coast line known as Goring Gap (SP5) both south, from Aldsworth avenue and north of the railway line, known as Chatsmore Farm and the associated green space (SP6) we would thank the planning team for endeavouring to preserve this local feature. Any attempts by contractors to build on this land will undoubtedly lead to there being an unbroken development of the coast from Goring further westwards.

We support the view expressed by the planning team, that this area should not be developed. Thank you for your efforts to preserve our local heritage.



THAKEHAM

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

REFERENCE

DWLP-M -91

Date received: 12/12/2018

12th December 2018

Dear Sirs,

Worthing Local Plan Regulation 18 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 the South East of England.

The Plan Period

The start date (2016) is not in conformity with national policy and guidance. Paragraph 2a-004 of PPG states that the baseline for the calculation of the standard methodology is the current year. Given that the uplift for affordability applied in step two of the standard methodology seeks to address the affordability concern created due to poor delivery in previous years, it would make sense that the start date for the plan should start from the same period. In order to make the plan sound, the plan period should be adjusted to the year in which the plan is submitted.

In addition, Paragraph 22 of the NPPF states that the Council should seek to prepare a plan that looks ahead for a minimum of 15 years. If the plan is to be submitted and examined in 2019 then the plan period should be extended to 2034.

Housing Needs

The Local Plan and Housing Implementation Strategy state that the housing needs using the standard methodology is 753 dwellings per annum (dpa), which gives a total for the plan period of 12,801 homes. This figure has been derived from the 2016 based household projections. Recent announcements indicate that this dataset is unlikely to form the basis of the standard methodology and, as a result, the Council will need to revert to use of the 2014 projections. Using the 2014 based household projections would require the Council ensure the delivery of 865 dpa rather than 753 dpa, if they are to provide the necessary uplift in housing delivery that is will address the growing affordability concerns in Worthing.

Thakeham House, Summers Place, Stane Street, Billingshurst, West Sussex, RH14 9GN

www.thakeham.com

Company Registration No. 07278594. Registered Office Address: Thakeham House, Summers Place, Stane Street, Billingshurst, West Sussex, RH14 9GN

Housing Supply

With regard to the supply of homes to meet this need the Local Plan states yhat it will not be possible to deliver the number of homes required to meet the figure established in using the standard methodology, with only 4,182 new homes being delivered in the Borough, less than half of the homes that the Government considers to be required to meet needs and improve affordability in Worthing. It is recognised that this reflects the fact that Worthing is constrained by the South Downs National Park to the north and the coast to the south, and that the Borough's boundary is drawn relatively tight of the urban edge and as such the opportunities for further development are more constrained than in many other Boroughs.

As a result of the above, the Council must ensure that any homes that are not delivered in this Local Plan are delivered elsewhere. There is presently no evidence to demonstrate how this will be secured. Paragraph 61-007 of PPG outlines the expected activities that need to be documented and this includes the preparation of strategic policies in relation to the delivery of unmet housing needs. It will therefore be essential that such polices are prepared in partnership with neighbouring authorities to identify how development in the area can be substantially increased.

Policy CP1 - Housing Mix

Policy CP1 requires all of new affordable and market housing on schemes of more than ten dwellings to meet Building Regulations requirement M4(2) for accessible and adaptable homes. It is essential that where local plans seek to apply the optional technical standards they are fully justified. This situation was set out in the Written Ministerial Statement dated 25th March 2015. It stated that *'the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG'*. Therefore, if the Council wishes to adopt the higher optional standards for accessible and adaptable homes the Council should only do so by applying the criteria set out in the PPG.

PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for Worthing which justifies the inclusion of optional higher standards for accessible and adaptable homes.

There is insufficient evidence to support part (c) of this policy and, as such, it is suggested that it is deleted.

CP2 - Density

The policy is unsound as it has not been justified. Paragraph 56-020-20150327 of PPG sets what is required of a local authority in order to adopt internal space standards. This paragraph reads as follows:

“Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. 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.”*

Whilst the Council have tested the impact on viability arising from the introduction of space standards, no evidence has been provided in relation to the need for such standards and whether this could impact on the deliverability of starter homes. Small homes for first time buyers form an essential part of delivery that will improve the affordability of homes for younger people who, as the Council’s evidence shows, are forming households far later than previous generations. It is important therefore important that any potential impacts in relation to needs is considered and without this evidence the Council cannot justify the inclusion of this policy.

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 faithfully



Katie Gilbert
Junior Planner

Draft Local Plan for Worthing Consultation Document October 2018 Comments Form

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 to 5pm on Wednesday 12th December 2018**

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

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

Phone: 01273 263000

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

Section A - Contact Details

First name	Kia		
Last name	Trainor		
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Address line 2	Blackboys		
Town	Uckfield		
Postcode	TN22 5HG	Telephone	Tel: 01825 890 975
Email address	info@cpresussex.org.uk		

Name		Date	
Signed			

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.

Note: Unless you request otherwise (by putting a cross in the box to the right), all respondents will be added to the Worthing Local Plan consultee database and will be notified at all subsequent stages of Local Plan progression.	No: please don't add me	
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SECTION B – COMMENTS

As set out below, this consultation document is formed of four parts. It would be helpful if you provide your comments under the relevant sections together with relevant policy number, paragraph and page numbers. However, if your comments are more general then your comments can be inserted in the box below.

GENERAL COMMENTS

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PART 1 - INTRODUCTION AND CONTEXT

(this 'part' includes characteristics of the borough/issues and challenges and vision & strategic objectives)

PART 2 - SPATIAL STRATEGY

(this 'part' sets out the proposed spatial strategy (what development and where) and the policies to deliver it)

SP4 Countryside and Undeveloped Coast . We welcome bullet point (f) in relation to the setting of the National Park.

SP5 Local Green Gaps. We strongly support the inclusion of a strategic gaps policy to ensure that each settlement maintains a distinct identity. We would also like this Policy to also recognise the roles that these gaps play in terms of natural capital provision and green infrastructure in line with the NPPF 2018.

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 3 - DEVELOPMENT SITES

(this 'part' includes details of the proposed future development sites)

Allocation 2 Land West of Fulbeck Avenue. We do not support the development of this greenfield site as it appears to be functionally linked to the adjacent Local Wildlife Site.

Omission Site 1 Land East of Titnore Lane. We support your conclusion that this site is not suitable for development due to impacts on the Local Wildlife Site and ancient woodland. We support the comment at the end of the plan relating to the change in the BUAB.

PART 4 CORE POLICIES - HOMES AND NEIGHBOURHOODS (Policies CPI – CP6)

PART 4 CORE POLICIES – SUSTAINABLE COMMUNITIES
(Policies CP7 – CPI0)

PART 4 CORE POLICIES – LOCAL ECONOMY
(Policies CPI1 – CPI4)

PART 4 CORE POLICIES – HISTORIC ENVIRONMENT (Policies CPI5 – CPI6)

PART 4 CORE POLICIES – ENVIRONMENT AND CLIMATE CHANGE (Policies CPI7 – CP23)

CP19 Biodiversity. We strongly support this policy, however the wording needs to be reviewed in some areas, for example; 4.245 “It will also work towards increasing appropriate species of woodland cover for the benefit of people and wildlife as well as to improve landscape quality.” This needs clarification.

In terms of the Policy itself we suggest minor amendments to points;

“c) Proposals for development in, or likely to have an adverse effect (directly or indirectly) on a Local Wildlife Site (including ancient woodlands, ancient/veteran trees, wildlife corridors and stepping stones) or Local Geological Site will not be permitted unless it can be demonstrated that **reasons for the proposal** outweigh the need to safeguard the nature conservation value of the site/feature. Where an exception is considered the mitigation hierarchy will apply.”

Perhaps this should be ‘benefits of the proposal’ instead of ‘reasons?’

“f) Major development should take account of and incorporate biodiversity features at the design stage and where possible environmental net gains should be achieved.”

We would like the requirement for net gains in biodiversity to be clear (i.e not ‘where possible’) with greater alignment to the NPPF 2018.

This box is a fixed size - please continue on separate sheet(s) at the end if necessary

**PART 4 CORE POLICIES – TRANSPORT AND CONNECTIVITY
(Policies CP24 – CP25)**

This box will grow to allow you to add extra comments

**Additional comments continuation sheet(s) -
please mark clearly which section your comments carry on from**

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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	Bending		
Organisation	Indigo Planning		
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Address line 2	10-15 Queen Street		
Town	London		
Postcode	EC4N 1TX	Telephone	02038482500
Email address	Louise.bending@indigoplanning.com		

Name	Louise Bending	Date	12/12/2018
Signed	Louise Bending		

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(this 'part' includes characteristics of the borough/issues and challenges and vision & strategic objectives)

PART 2 - SPATIAL STRATEGY

(this 'part' sets out the proposed spatial strategy (what development and where) and the policies to deliver it)

We support the spatial strategy put forward in this version of the Local Plan which seeks to enhance the retail offering in the town centre and provide additional commercial floorspace while retaining and enhancing the existing stock. We do believe, however, that the role of the town centre should be acknowledged to be changing and, as a result, flexibility in the use classes should be allowed. Albeit not a planning matter, a view on reducing business rates for small businesses should be taken so as to encourage the revitalisation of our town centres. This will contribute to the economic prosperity and resilience of the region.

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 3 - DEVELOPMENT SITES

(this 'part' includes details of the proposed future development sites)

We wish to promote the site located at 19-23 & 35-39 South Street and 5-13 Liverpool Buildings, Liverpool Road, Worthing for allocation within the Local Plan. A planning application (LPA Ref. AWD/1529/18) for this site was submitted in October 2018 for the creation of 45 apartments with flexible uses at ground floor at 5-12 Liverpool Buildings (A1/A2), and flexible use at ground floor level at 35-39 South Street (A1/A2/A3).

The proposed regeneration scheme will contribute to the housing requirements of the Council whilst ensuring that the Beales department store, an important retailer in the town for many years, is retained and refurbished to provide high quality retail floorspace in the established regional centre of Worthing. In providing new residential units in the town centre, the scheme benefits from the sites accessibility and will utilise the existing transportation links. The site meets the "Call for Sites" requirements of being larger than 0.25ha and can provide more than five dwellings. A completed "Call for Sites" form accompanies these representations.

PART 4 CORE POLICIES - HOMES AND NEIGHBOURHOODS (Policies CP1 – CP6)

Proposed Policy CP3 relates to Affordable Housing. Where affordable housing is sought on appropriate and viable sites, the policy should ensure that there is sufficient flexibility in terms of tenure and mix. Off-site contributions in lieu of affordable housing should also be collected in a discretionary manner, subject to the viability of the overall scheme, particularly where there are significant regeneration benefits resulting from proposals which must be prioritised. Therefore, the wording of draft policy CP3 should be amended to reflect a more variable percentage of affordable housing required, a principle used by Rother District Council in their Regulation 19 submission of the Development and Site Allocations Local Plan. This principle should be used in Worthing on, for example, regeneration schemes which deliver other public benefit, and which should therefore require a lower percentage of affordable housing to be received.

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 4 CORE POLICIES – SUSTAINABLE COMMUNITIES (Policies CP7 – CPI0)

Proposed Policy CPI0 refers to the delivery of infrastructure and the Community Infrastructure Levy. We suggest that the wording of the policy in the next stage of consultation allows for discretionary relief where required and when beneficial to regeneration schemes. The impact of CIL payments can significantly affect the delivery of new development which otherwise would secure significant public benefit. On sites where the viability of development and other public benefit is marginal, the Council would adopt formal measures that allow the awarding of discretionary relief to enable the delivery of marginally viable schemes.

PART 4 CORE POLICIES – LOCAL ECONOMY (Policies CPI1 – CPI4)

Proposed Policy CPI4 relates to retail provision.

In particular, this policy should ensure that town centre retail units have sufficient flexibility in terms of their use class to allow for units to meet retailer demand and applications for flexible uses (eg A1/A2/A3 or similar) which will allow resilience of the high street should be supported by planning policy. Allowing flexibility in the use classes (eg a higher proportion of food and beverage offerings, markets, festivals) will reduce the likelihood of vacant units and, in doing so, will contribute to the increase in average footfall and visitor numbers into the town centre.

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 4 CORE POLICIES – HISTORIC ENVIRONMENT (Policies CPI5 – CPI6)

PART 4 CORE POLICIES – ENVIRONMENT AND CLIMATE CHANGE (Policies CPI7 – CP23)

Proposed Policy CP21 refers to flood risk. Worthing, along with many other towns and villages along the South coast, are naturally at a higher risk of coastal flooding. Proposals for residential units falling within flood risk areas, and within designated urban centres should be supported where residential accommodation is proposed above ground floor level. While the proximity of town centres to the seafront should include appropriate flood risk mitigation, where development is clearly not proposing an increase of floorspace at ground floor level, the requirement to provide a comprehensive flood risk assessment should be addressed pragmatically. Furthermore, the policy should be clear that the County Council's requirement to improve drainage through the use of Sustainable Urban Drainage Systems should only apply to sites that are proposed to be comprehensively redeveloped. This view is supported within national policy in Paragraph 163 which seeks to ensure that the risk of flooding is not increased as a result of new development.

This box is a fixed size - please continue on separate sheet(s) at the end if necessary

**PART 4 CORE POLICIES – TRANSPORT AND CONNECTIVITY
(Policies CP24 – CP25)**

This box will grow to allow you to add extra comments

**Additional comments continuation sheet(s) -
please mark clearly which section your comments carry on from**





WORTHING BOROUGH C O U N C I L

Brownfield Land Register Part 1/ Strategic Housing Land Availability (SHLAA) Call for Sites response form

Please complete and return this form if you would like any additional sites to be considered in Part 1 of the Council's Brownfield Land Register and /or SHLAA. Sites must be at least 0.25 hectares in size OR capable of supporting at least 5 dwellings. Based on the information you provide and other publicly available information the Council will consider whether sites meet all the relevant criteria for inclusion.

PLEASE COMPLETE A SEPARATE FORM FOR EACH SITE SUBMITTED.

Further information about the Worthing SHLAA reports can be found on the Council's website: [Worthing SHLAA](#).

Use of information:

The information collected in this response form will be used by Worthing Council to inform the content of the Brownfield Land Register and future updates to the Council's Strategic Housing Land Availability Assessment.

By responding you are accepting that your response and the information within it will be in the public domain, and that it may be disclosed if requested under the Freedom of Information Act. However, any published information will not contain personal details of individuals. Further information about how personal information is processed can be found on the Council's website in the Planning Policy Privacy Notice: <https://www.adur-worthing.gov.uk/planning-policy/privacy-notice>
All data will be stored securely in line with the GDPR.

Your Details

Name	Louise Bending
Company Name (if applicable)	Indigo Planning on behalf of St Clair Developments Limited
Address	Indigo Planning Aldermay House 10-15 Queen Street London EC4N 1TX
Postcode	EC4N 1TX
Telephone Number	020 3848 2500
Email	Louise.bending@indigoplanning.com

Site Details

Site Address	19-23 & 35-39 South Street and 5-13 Liverpool Buildings, Liverpool Road, Worthing
Site Postcode	BN11 3AN
Area of whole site (hectares)	0.33
Developable area (hectares)	0.33
OS Grid Reference	Easting: 514906; Northing: 102522
<p>Please attach a plan outlining the precise boundaries of the whole site and the part which may be suitable for housing (if this is less than the whole).</p> <p>Note: <u>If you do not provide this we will be unable to consider the site for inclusion.</u></p>	

Ownership Details

Are you the site owner?	Yes
If 'yes', are you:	<p>Sole owner? Yes</p> <p>Part owner? Yes / No</p> <p>Please list other owners:</p>
If 'no', who is the owner? (please list if more than one)	n/a
Do all owners of the site know you are proposing it for development?	Yes
Have all owners of the site indicated their support for its use for housing-led development?	Yes

Additional Site Details

What is the current (or most recent) use of the site?	The site currently comprises a mixed-use site with retail on the ground and first floors and offices and storage on the first, second and third floors. A significant part of the retail floorspace is occupied by the Beales Department Store which is an important retail anchor in the town centre.
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Description of proposed residential development	The creation of 45 new residential apartments through the extension and change of use of the existing buildings including 3 additional storeys to Liverpool Buildings, elevation balconies at second and third floor levels and roof terrace at fourth floor. New shopfronts and external alterations to the elevation of Liverpool Buildings. New shopfronts and additional floor to South Street elevation with new windows at third and fourth floor. The creation of up to seven new retail units from existing retail floorspace with flexible A1/A2 use and the change of use of an existing A1 unit to flexible A1/A2/A3 use, car parking and associated works as per application ref. AWDM/1529/18.
Number of residential dwellings proposed	45 new dwellings.
Description of any proposed non-residential development (please specify floorspace)	Ground floor to remain in A-class retail use with residential development on the upper floors as per the description.

Site Constraints

Please identify any known constraints affecting the development of this land under the following headings:	
Access difficulties	The site is well located in the town centre and benefits from the town's good accessibility by public transport.
Contamination/pollution	N/a
Flood Risk	The site is partially located in Flood Zone 2 and 3a (Sea flooding). All residential development is proposed at first floor level and above.
Hazardous Risks	N/a
Infrastructure constraints	N/a
Legal issues	N/a
Other (please specify)	

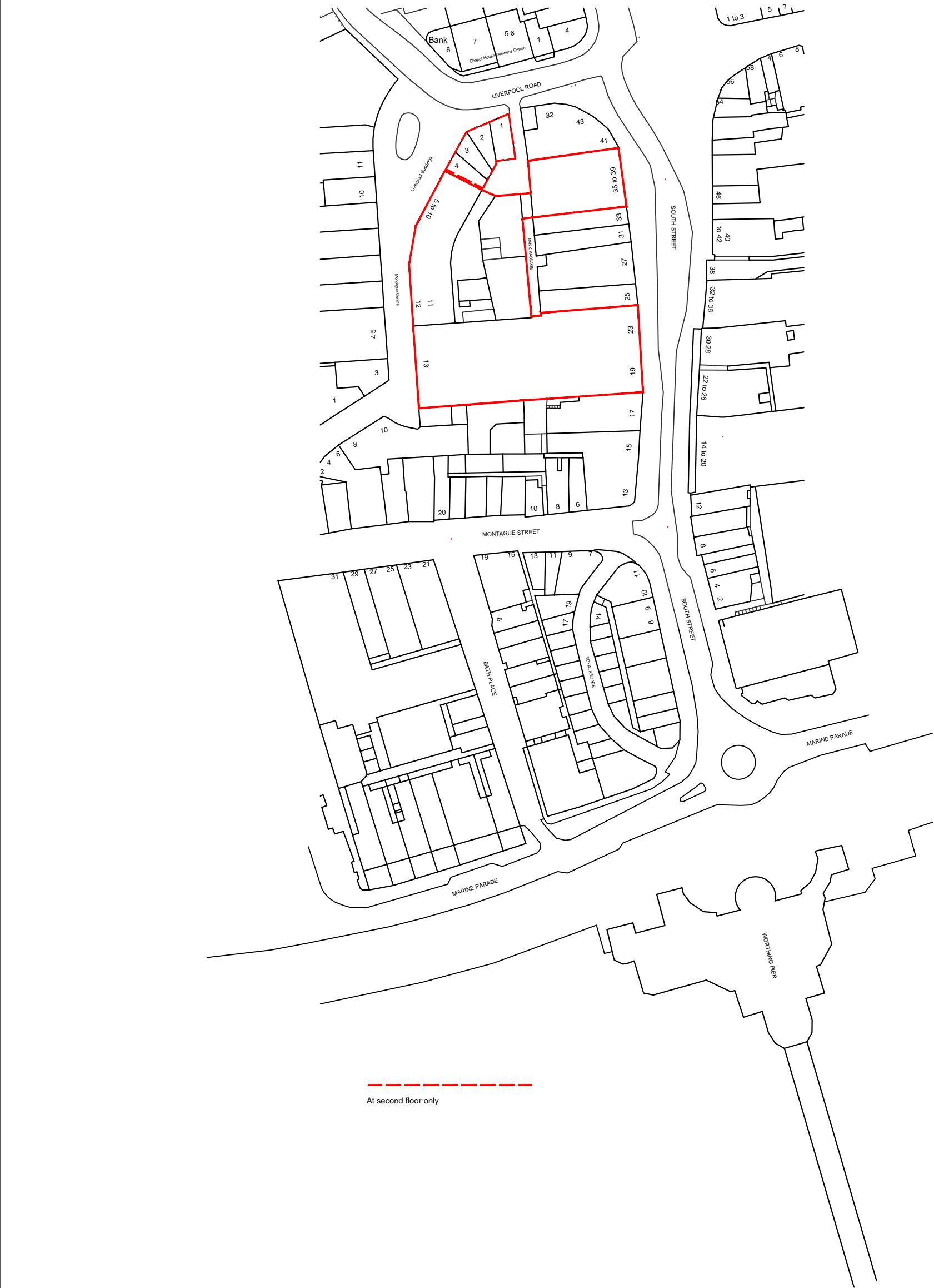
Timescale and phasing of development

When will the site be available?	Yes
Immediately	X
Up to Five Years	
6 – 10 years	
11 – 15 years	
More than 15 years	
How many years is construction likely to take?	
2	
Is development on the site likely to be phased – if yes please provide an indication?	
No.	



Please return the form and site plan to:

Worthing Planning Policy Team
Portland House
44 Richmond Road
Worthing
West Sussex
BN11 1HS

Or email: planning.policy@adur-worthing.gov.uk



A3

	Rev	Date	Amendment	Date	Project	Job Ref.	Job no.	
	A	10.09.2018	Planning Issue	June 2018	Worthing	WOR	217	
© 3W Architecture Limited. All rights reserved.				Scale @ A3 1:1250	Checked	Title Site Location Plan		
3W Architecture Limited registered in England.				Status Concept	Dwg. No. 217(05)001		Rev. A	
Company no. 3132871 Registered Office The Pines Boars Head East Sussex				Architect  Thames Wharf Studios Rainville Road London W6 9HA tel. 020 7835 5552 fax. 020 7835 5525 email. mail@3W.org				

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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	Huntley		
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Address line 2	Worthing Road		
Town	Rustington		
Postcode	BN16 3PS	Telephone	01344 762652
Email address	rob.huntley@talk21.com		

Name	Rob Huntley	Date	11 December 2018
Signed	<i>R. Huntley</i>		

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In addition, if you would like to subscribe to the Worthing Planning Policy Newsletter (which covers a wide range of Planning Policy issues) then please put a cross in this box:	X
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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. However, contact details will not be published. Unfortunately, we cannot accept or report confidential or anonymous responses. Further information about how personal information is processed can be found on the Council's website in the Planning Policy Privacy Notice:

<https://www.adur-worthing.gov.uk/planning-policy/privacy-notice/>

All data will be stored securely in line with the GDPR.

SECTION B – COMMENTS

As set out below, this consultation document is formed of four parts. It would be helpful if you provide your comments under the relevant sections together with relevant policy number, paragraph and page numbers. However, if your comments are more general then your comments can be inserted in the box below.

GENERAL COMMENTS

The draft plan makes insufficient provision for new housing development to address the scale of established need and demand.

Two parcels of land, to the north of Beeches Avenue and at the football ground at Lyons Way, are suitable for residential development in landscape, transport and other terms. These 2 sites should be specifically allocated for residential development in the plan, rather than being referred to as Omission Sites.

This box is a fixed size - please continue on separate sheet(s) at the end if necessary

PART 1 - INTRODUCTION AND CONTEXT

(this 'part' includes characteristics of the borough/issues and challenges and vision & strategic objectives)

Paragraph 1.3 of the draft plan identifies that one of the key purposes of the plan is to provide opportunities to create new homes for present and future generations. As drafted, the plan does not sufficiently fulfil this key purpose, because it omits to allocate land suitable for residential development at Beeches Avenue and Lyons Way.

The geographically constrained nature of Worthing Borough, acknowledged in paragraph 1.30 and elsewhere, makes it all the more important that best use is made of the limited availability of land suitable for residential development, so that local requirements can be addressed as far as possible. Allocating the sites at Beeches Avenue and Lyons Way for residential development would contribute positively to the extent to which local housing requirements in the Borough would be met over the plan period.

Promoting residential development on these 2 sites would directly accord with, and contribute positively to the achievement of, Strategic Objectives SO1 and SO2.

PART 2 - SPATIAL STRATEGY

(this 'part' sets out the proposed spatial strategy (what development and where) and the policies to deliver it)

The housing delivery target set out in the Spatial Strategy section of the draft plan is a wholly inadequate response to the scale of requirement for residential development in Worthing over the plan period to 2033. Paragraph 2.16 of the draft plan acknowledges that the national policy objective, as set out in the NPPF, is to meet the full need for market and affordable housing.

The calculation set out in the Housing Implementation Strategy makes clear that the level of new housing that the plan should make provision for is 12,800 homes over the plan period to 2033. This equates to an average rate of development of 753 homes per year. The plan as drafted seeks housing provision of only one third of the level representing the defined scale of objectively assessed need, with total provision of new homes to 2033 being only 4,182, equating to an Annual Delivery Target of 246 homes. Meeting even this very low level of planned provision from the sources identified will be challenging, as paragraph 2.33 acknowledges. It is unlikely that existing commitments, windfall sites and SHLAA sites will achieve the scale of completions assumed in table 1 of the plan. This will further depress the likely delivery of new homes in Worthing.

The plan acknowledges in paragraph 2.34, that only 33% of the overall housing need is proposed to be met and that there would be a resulting shortfall in housing delivery over the Plan period of approximately 8,600 dwellings. This low provision for development would perpetuate a severe shortage of housing in the Borough and would fail to contribute positively to the achievement of Strategic Objectives SO1 and SO2 or the aims of national policy. The housing provision aspects of the plan require to be augmented and additional land allocated for development, so as more closely to achieve the scale of housing provision required to meet the established requirement.

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 3 - DEVELOPMENT SITES

(this 'part' includes details of the proposed future development sites)

Land north of Beeches Avenue and Worthing United Football Club ground, Lyons Way (Sites OS2 and OS3)

These sites, identified in the draft plan as "omission sites", are inherently suitable for development to provide additional housing. They are well located in relation to the existing built-up area of Worthing. The football ground site is within the defined built-up area and the Beeches Avenue site is bounded on three sides by the defined built up area.

The plan identifies these as sites where, in principle, residential development would be acceptable. It makes clear that they could be allocated for development if what are currently regarded by the Council as delivery constraints can be suitably addressed. The constraints identified in the plan are the provision of appropriate access and, in the case of the football ground site, the potential relocation of that facility.

Separate sheets attached to this response form provides further detail explaining that there are no insuperable impediments to these 2 sites being brought forward for development. The 2 sites comprising land north of Beeches Avenue and the Worthing United Football Club ground at Lyons Way, should be allocated for residential development in the plan. In combination these could enable the provision of at least 150 homes, which would be a significant contribution towards lessening the very significant shortfall in housing provision Worthing over the plan period to 2033. These 2 sites should accordingly be allocated for development in the emerging plan, rather than being identified as Omission Sites (OS2 and OS3).

PART 4 CORE POLICIES - HOMES AND NEIGHBOURHOODS (Policies CPI – CP6)

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 4 CORE POLICIES – SUSTAINABLE COMMUNITIES
(Policies CP7 – CP10)

PART 4 CORE POLICIES – LOCAL ECONOMY
(Policies CP11 – CP14)

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 4 CORE POLICIES – HISTORIC ENVIRONMENT
(Policies CP15 – CP16)

PART 4 CORE POLICIES – ENVIRONMENT AND CLIMATE CHANGE
(Policies CP17 – CP23)

This box is a fixed size - please continue on separate sheet(s) at the end if necessary

PART 4 CORE POLICIES – TRANSPORT AND CONNECTIVITY (Policies CP24 – CP25)

This box will grow to allow you to add extra comments

Additional comments continuation sheet(s) - please mark clearly which section your comments carry on from

COMMENTARY REGARDING OMISSION SITES OS2 AND OS3 (LAND NORTH OF BEECHES AVENUE AND WORTHING UNITED FOOTBALL CLUB GROUND, LYONS WAY)

The consultation draft plan acknowledges that sites OS2 (Beeches Avenue) and OS3 (the football ground off Lyons Way), are suitable for development to contribute to meeting local housing requirements. The draft plan explains that, at the stage of preparing the draft, there appeared to be potential constraints on the ability of these sites to be brought forward for development. It comments that the purpose of drawing attention to these sites in the draft plan is to enable evidence to be provided to address these aspects so that these sites could be allocated for development in the next version of the plan, if it can be demonstrated that any delivery constraints can be suitably addressed.

Hargreaves Residential Developments Ltd has the benefit of an option agreement in respect of both the Beeches Avenue and football ground sites. It is able to bring both areas of land forward for development and to realise the significant contribution that their development would make to the delivery of necessary housing growth in Worthing.

The paragraphs below address the constraints referred to in the draft plan as affecting the potentially developability of these 2 sites, and explains that these can be readily overcome. Bearing this in mind, these 2 sites should be identified as specific allocations in the next version of the plan.

Site OS2 - Beeches Avenue

It is acknowledged that Beeches Avenue is not suitable to provide access for any significant level of development, because of the constraint imposed by its junction with the A27. However, as the WSP transport study undertaken for the Council acknowledges, Lyons Way has adequate capacity to cater for traffic from the 150 or so dwellings that would arise from development of both the Beeches Avenue and Lyons Way sites together. A suitable access road can be readily created from Lyons Way across the car parking area within the football club site, to enable suitable vehicular, cycle and pedestrian access to be provided to enable development of the Beeches Avenue land.

The Transport Appraisal prepared by consultants David Tucker Associates, which accompanies these representations, explains this in detail. The DTA appraisal also includes a drawing which shows the alignment and dimensions of this access road. This makes clear that the road would not interfere with the football pitch, which could remain in use unless and until that part of the land became available for development. The existing clubhouse building would also be able to be retained notwithstanding the construction of the access road. Although the road would cross land currently used for parking, a more efficient layout of spaces on the remaining land would permit the retention of on-site parking facilities in connection with the football ground.

From this it is apparent that a suitable access can be constructed to enable residential development of the Beeches Avenue (OS2) land to take place. This would not give rise to any additional traffic on Beeches Avenue or at its junction with the A27. Indeed, the provision of a new access via Lyons Way would reduce vehicular movements on Beeches Avenue as existing traffic associated with the car repair workshops would no longer need to use Beeches Avenue. Replacement of the car repair activities presently undertaken on part of the Beeches Avenue land by well-designed residential accommodation would also bring about amenity improvements, benefitting nearby residential properties.

For the above reasons, there is no constraint on the ability of the Beeches Avenue site to be brought forward to deliver around 90 dwellings. This should therefore be reflected in the Local Plan with the OS2 site being allocated for residential development accordingly.

Site OS3 – the Football Ground

As explained above in respect of the Beeches Avenue site, the provision of a suitable access does not require displacement of the use of the football ground, either of the football pitch or the clubhouse. Both aspects can continue in operation notwithstanding the residential development of the adjacent Beeches Avenue land, served by an access from Lyons Way. Car parking will also be able to be retained on the site, notwithstanding the construction of an access road across part of it. A more formalised layout of spaces on the remaining land would ensure that there need be no undue reduction in parking provision at the site.

Clearly, bringing forward the remainder of the football ground land for development would involve displacement of the existing football-related use. However, there is no guarantee that this use can remain in the medium to longer term, irrespective of any development proposal. The occupation of the football ground is permitted by a lease, the terms of which do not give long-term security to the continuation of the football ground use. The terms of the lease provide that the landowner may terminate the lease at any time on giving not less than 6 months notice. This has been the position for many years, since at least 1999 when a previous lease was entered into.

It is also the case that the facilities available at the site are less than ideal. The nature of the pitch and the accommodation for players and spectators are not of a standard that would permit the club to realise its ambitions to progress within the FA league structure. The absence of long term security of occupation, the limited size of the site, and poor quality of the current facilities, mean that there is no incentive or practical ability for investment to be made to enable the football facility to be enhanced.

The Council has commenced a review of the adequacy of recreational and sports provision in the

Borough. It is understood that this will address issues of both quality and the amount and type of provision. It seems likely that, when completed, this review will recognise the appropriateness of higher quality, all weather pitch provision, probably involving arrangements for ground sharing. In view of the practical and physical constraints outlined above, the Lyons Way site does not provide a realistic option to contribute long term to Worthing's sport and recreation needs.

It is recognised that it may be inappropriate for development to be undertaken which would necessitate displacement of the existing the football use ground site in the short term. However, with time being given for measures to be put in place in accordance with the Council's emerging strategy of sport and recreational enhancement, it would be appropriate for the Lyons Way site to be allocated for residential development in the local plan. This allocation would act as a catalyst to encourage positive steps to be taken by all parties (the landowner, the Council, the football club and Hargreaves) to move towards a sustainable long-term solution to facilitate the development of the site.

The local plan is intended to cover the period up to 2033. In the medium term, development of the football ground site would enable a valuable addition, equivalent to around 60 dwellings, to be made to housing land supply, contributing to the alleviation of the very substantial shortfall in supply that the draft plan acknowledges. This should therefore be reflected in the Local Plan with the OS3 site being allocated for residential development accordingly, albeit with a recognition that this may not come forward early in the early years of the plan period.

Conclusion

As explained above, the Beeches Avenue site can be satisfactorily developed, served by the creation of a new vehicular access from Lyons Way. This access, as illustrated on the plan contained within the DTA Transport Assessment accompanying these representations, would not require displacement of the football pitch or the clubhouse. The Beeches Avenue land can therefore be brought forward in the short term to enable the delivery of around 90 dwellings. This would make a valuable contribution to alleviating the acknowledged shortfall in housing provision in the town.

The Beeches Avenue site (OS2) should be specifically allocated for development in the emerging local plan, for development early in the plan period, to provide around 90 dwellings.

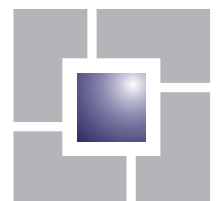
The football ground site at Lyons Way is also suitable for residential development. The access to be provided to serve the Beeches Avenue site would also be suitable to serve this additional development. In order to provide an impetus and the opportunity for appropriate arrangements for sports and recreational provision be made in the town, the local plan should make specific provision for residential development at the football ground site, albeit with the expectation that development would come forward as a second phase, after development of the Beeches Avenue land.

The construction of the proposed access road to serve residential development on the Beeches Avenue land, would provide ready-made access for development of the football ground land. This, and the associated provision of infrastructure and services in conjunction with the road construction, would ensure that development of the football ground site could be brought forward as soon as that land became available. This would thereby enable a further significant contribution to meeting Worthing's housing requirements to be realised in a timely manner.

The Lyons Way Football Ground site (OS23) should be specifically allocated for development in the emerging local plan, for development later in the plan period, to provide around 60 dwellings.

**Land at Beeches Avenue (Local Plan ref: OS2)
& Worthing United Football Club
(Local Plan ref: OS3)**

Transport Appraisal



**Land at Beeches Avenue &
Worthing United Football Club
(Local Plan ref: OS2 and OS3)**

Transport Appraisal

12th December 2018
SJT/RM/14047-04e Local Plan Representation
(transport)

Prepared by:

David Tucker Associates

Forester House, Doctors Lane
Henley-in-Arden
Warwickshire
B95 5AW

Tel: 01564 793598
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www.dtatransportation.co.uk

Prepared For:

**Hargreaves Residential
Developments Limited**

1. David Tucker Associates has been commissioned by Hargreaves Residential Developments Limited to advise on the transport and access implications for two sites identified within the emerging Local Plan: OS2: Land North of Beeches Avenue and OS3: Worthing United Football Club. It is envisaged that site OS2 could accommodate 90 dwellings and OS3 60 dwellings. In total the sites would provide 150 dwellings.
2. Both sites are within the same ownership however they are differentiated based on their existing uses:
 - OS2: Land North of Beeches Avenue currently takes access from Beeches Avenue. The site is a large paddock with a small scale commercial use on the southern part of the site (car repair business).
 - OS3 Worthing United Football Club currently takes access from Lyons Way. The northern part of the site is a football pitch whilst the southern part of the site contains the club house, car parking, and an all-weather surface that is also used for motorcycle training.
3. The off-site implications of the residential development of these two sites has already been appraised through the Strategic Transport Assessment (STA) dated August 2018. The STA was undertaken by WSP on behalf of the Borough Council and considers the cumulative traffic impact of the Local Plan development – taking forward earlier Highways England (HE) traffic modelling. The report/model considers the A27 corridor throughout Worthing Borough, also extending to include adjacent elements such as the Arundel Bypass. The main finding of the report is that ‘this transport assessment has shown that there is no material impact of the proposed Worthing Local Plan sites [*all land uses*] upon the performance of the SRN [*Strategic Road Network*]’.
4. Locally the STA queries the ability of Beeches Avenue to practically accommodate the existing level of traffic flow. Whilst technically the appraisal could be refined, it is nonetheless accepted that the right turn movement out from Beeches Avenue during the peak periods is very difficult. As such intensification of traffic on Beeches Avenue is problematic. The STA report recommends access via Lyons Way and onto the A27 for both sites and it is proposed to adopt this approach with no intensification of vehicular traffic using Beeches Avenue. The STA confirms that the A27-Lyons Way

junction has ample capacity to access both the Beeches Avenue site and the football club site.

5. The STA further considers the implications of the HE proposals to improve the A27 through Worthing (RIS1 scheme). Final details of this scheme are not currently available pending further development following public consultation. The STA however tests the emerging scheme and concludes that improvements would improve conditions on the A27. In any event, on the basis that the development does not load onto a critical junction on the A27 and that there is not a direct dependency between the RIS and Local Plan the delivery of these sites is not constrained by nor prejudicial to the A27 improvement plans.
6. Lyons Way is currently highway maintainable at public expense. Notwithstanding this, the road has been gated to the north of Downlands Business Park in order to prevent unauthorised access by way of caravans, parking on the road, fly tipping etc. This section of road has not been "stopped up" and remains a public highway. In order to facilitate full access to sites OS2 and OS3, land north of Beeches Avenue and Worthing United Football Club respectively, an agreement has been entered into between the freeholders and West Sussex County Council dated 14th June 2017 in order to provide for the removal of the existing gates and alternative methods of enforcement of the TRO; a copy of the agreement is attached to this report at **Appendix A**.
7. There is an existing access onto Lyons Way into the car parking area for the football club. At present this is a simple footway crossover however this would be upgraded to provide more formal kerb radii and bellmouth. This would be constructed with geometry appropriate to serve the development of both the Beeches Avenue land (site OS2) and the football ground (site OS3), with a combined potential of around 150 dwellings. The access road would be 5.5m in width with a 2.0m footway.
8. The development of the whole of the OS3 site would require the displacement of the football ground. However, adequate space is available to create an access from Lyons Way to enable development of the Beeches Avenue land (OS2) while retaining the football pitch, the clubhouse building and reconfigured car parking.
9. In order to allow for orderly arrangements to be made for the vacation of the football ground, it is likely that the Beeches Avenue land (OS2) would be brought forward for

development first. The creation of an access through the car parking area of the football club would enable this to be achieved while retaining the football pitch, reconfigured parking and clubhouse in use. The link road will be around 150m in length from Lyons Way to the Beeches Avenue site. In order to reflect the maximum length of straight section recommended within Manual for Streets, a traffic calming feature would be incorporated roughly mid-way. An indicative plan is attached, at **Appendix B**, showing these access arrangements (**DTA Drawing 14047-02a**).

10. Pedestrian and cycle access to the site would be via both Beeches Avenue and Lyons Way to ensure that the site is well integrated into the adjacent built areas so that residents will be able access local facilities and services in a sustainable manner. Further measures to exploit sustainable travel options can be considered at the planning application stage.
11. The STA identified measures to mitigate the traffic impacts of all local plan development. An appropriate contribution to such works would be made in conjunction with the development of these sites.
12. Overall the STA confirms that both sites can be developed without any unacceptable impact on the highway network. As explained above, the 2 sites can be developed sequentially or in tandem, with vehicular access taken from Lyons Way. Such an access onto Lyons Way can be formed and put into use to enable development at the Beeches Avenue land without any need for the football pitch or clubhouse building to be displaced. Development of the football pitch and related land could be completed at a later time, utilising the same access, when arrangements for the vacation of the football ground had been put in place.

SKP\RJM\14047-04e Local Plan Representation (transport)
12th December 2018

APPENDIX A

Traffic Regulation Agreement

DATED 14th June 2017

[REDACTED]

- and -

[REDACTED]

- and -

WEST SUSSEX COUNTY COUNCIL

AGREEMENT
relating to a proposed traffic regulation
order at Lyons Way, Worthing

Wedlake Bell

52 Bedford Row
London
WC1R 4LR

Direct Dial +44 (0)207 406 1636
Direct Fax +44 (0)20 7406 1602
Direct Email mmainstone@wedlakebell.com
HAR/0328/00329/WB1-13030854-1

DATE

14th June

2017

PARTIES

1. [REDACTED] ("the First Owner").
2. [REDACTED] ("the Second Owner").
3. WEST SUSSEX COUNTY COUNCIL of County Hall, Chichester, PO19 1RQ ("the Council").

INTRODUCTION

- (A) The Owner is the registered freehold owner of the Land at the Land Registry under title number WSX242995.
- (B) The Council is the highway authority for Lyons Way, Worthing, which provides access to the Land.
- (C) On 30 July 2015 the Council published a notice of its proposal to make the Traffic Regulation Order under sections 1(1), 2(1) and (2), and 4(1) of the Road Traffic Regulation Act 1984.
- (D) In connection with the Traffic Regulation Order the Council intends to erect and maintain a gate across Lyons Way in the approximate position identified on the Plan.
- (E) On 18 August 2015 the Owner submitted the Objection to the Council.
- (F) The Owner and the Council have agreed to enter into this agreement in order to enable the Owner to withdraw the Objection and the Council to proceed to make the Traffic Regulation Order.

OPERATIVE PROVISIONS

1. DEFINITIONS

In this agreement, except where a different interpretation is necessary in the context, the expressions set out below shall have the following meanings:

"the Objection" means the letter dated 18 August 2015 to the Council from Wedlake Bell, on behalf of the Owner, objecting to the Traffic Regulation Order, a copy of which is appended to this agreement at Annex A.

"the Owner" means together the First Owner and the Second Owner.

"Land" means the land edged red on the Plan.

"Plan" means the plan appended to this agreement at Annex B.

"the Traffic Regulation Order" means the West Sussex County Council (Worthing: Lyons Way (Prohibition of Driving) Order 2015, the draft of which is appended to this agreement at Annex C.

2. INTERPRETATION

- 2.1 The clause, paragraph and Annexure headings used in this agreement are inserted for ease of reference only and shall not affect construction.
- 2.2 Except where the context specifically requires otherwise, words importing one gender shall be treated as importing any gender, words importing individuals shall be treated as importing corporations and vice versa, words importing the singular shall be treated as importing the

plural and vice versa, and words importing the whole shall be treated as including a reference to any part of the whole.

- 2.3 If any condition or covenant contained in this agreement requires a party to it not to do an act or thing it shall be a breach of any such condition or covenant to permit or suffer such act or thing to be done.
- 2.4 References to statutory provisions or enactments shall include references to any amendment, modification, extension, consolidation, replacement or re-enactment of any such provision or enactment (whether before or after the date of this agreement) to any previous enactment which has been replaced or amended and to any regulation instrument or order or other subordinate legislation made under such provision or enactment (unless any such change imposes upon any party any liabilities or obligations which are more onerous than as at the date of this agreement).
- 2.5 Where a party consists of more than one person covenants and obligations of that party shall be deemed to be made jointly and severally.
- 2.6 Subject to clause 5, this agreement does not confer any rights on any person or party (other than the parties to the agreement) pursuant to the Contracts (Rights of Third Parties) Act 1999.

3. OWNER'S COVENANTS

- 3.1 In consideration of the Council entering into this agreement the Owner shall withdraw the Objection in writing to the Council within five working days of the date of this agreement.

4. COUNCIL'S COVENANTS

The Council agrees with the Owner as follows:

- 4.1 That the Traffic Regulation Order shall not be made other than in the form of the draft appended to this agreement at Annex C; and
- 4.2 Subject to the making of the Traffic Regulation Order to provide the Owner at the Owner's reasonable request with additional/replacement keys for the lock(s) or replacement lock(s) for any gate that is erected across Lyons Way in connection with the Traffic Regulation Order; and
- 4.3 Upon receiving written notice from the Owner that the Owner has submitted a planning application with the intention that the Land be developed to give full and proper consideration to appropriate methods of enforcement of the Traffic Regulation Order such consideration to include alternative traffic orders and revocation of the Traffic Regulation Order; and
- 4.4 If having followed the appropriate statutory procedure and decision making process under the Road Traffic Regulation Act 1984 the Council decides to either revoke the Traffic Regulation Order or introduce a new traffic regulation order the Council will use all reasonable endeavours to implement that decision.

5. ASSIGNMENT AND TRANSFER

- 5.1 The Owner shall be entitled to:
- 5.1.1 assign any of its rights under this agreement;
 - 5.1.2 transfer any of its obligations under this agreement;
 - 5.1.3 sub-contract or delegate any of its obligations under this agreement; and
 - 5.1.4 charge or deal in any other manner with this agreement or any of its rights or obligations.

6. GOVERNING LAW AND JURISDICTION

This agreement is governed by and is to be construed in accordance with English law. The parties irrevocably agree that the courts of England and Wales shall have exclusive jurisdiction to settle any dispute arising out of or in connection with this agreement.

7. SEVERANCE

If any provision of this agreement is held to be invalid or unenforceable by any judicial or other competent authority, all other provisions of this agreement will remain in full force and effect and will not in any way be impaired.

8. SURVIVAL ON TERMINATION

Termination or expiry of this agreement shall not affect the rights or liabilities of either party accrued prior to and including the date of termination or expiry and/or any terms intended expressly or by implication to survive termination or expiry.

9. WAIVER

9.1 Any omission to exercise or delay in exercising any right or remedy under this agreement shall not constitute a waiver of that or any other right or remedy.

9.2 The waiver by any party to this agreement of any of its rights or remedies arising under this agreement or by law shall not constitute a continuing waiver of that right or remedy or a waiver of any other right or remedy.

10. NOTICES

10.1 Any notice to be given under this agreement must be in writing and signed by the person giving it or some person authorised by them and will be duly served 48 hours after being sent by registered or recorded delivery post to the recipient at its address set out in this agreement or notified in writing to the other party from time to time or (if earlier) when delivered to the recipient.

10.2 Notices may not be served by electronic mail.

11. NO FETTER OF DISCRETION

11.1 Nothing (contained or implied) in this Agreement shall fetter or restrict the Council's statutory rights, powers, discretions and responsibilities.

THIS AGREEMENT is executed as a deed by the parties and is delivered and takes effect on the date at the beginning of this agreement.

Signed as a DEED by
[REDACTED] in the
presence of:

)
)
)

[REDACTED]

[SIGNATURE]

.....
[SIGNATURE OF WITNESS]

[NAME OF WITNESS]

[ADDRESS OF WITNESS]

[OCCUPATION OF WITNESS]

[REDACTED]

Signed as a DEED by
[REDACTED] in the
presence of:

)
)
)

[REDACTED]

.....
[SIGNATURE]

.....
[SIGNATURE OF WITNESS]

[NAME OF WITNESS]

[ADDRESS OF WITNESS]

[OCCUPATION OF WITNESS]

[REDACTED]

THE COMMON SEAL of
WEST SUSSEX COUNTY COUNCIL
was affixed to this deed in the presence of:

)
)
)

Delegated authority

[REDACTED]

- 4 -

[REDACTED]



WB1\13030854\1

Annex A
Objection

West Sussex County Council
TRO Team
The Grange
Tower Street
Chichester PO19 1RH

Date 18 August 2015
Your ref WOR8008-MM
Our ref MAIM/HAR/0328/00329/GALJ
Direct Dial +44 (0)207 406 1636
Direct Fax +44 (0)20 7406 1602
Email mmainstone@wedlakebell.com

Dear Sir/Madam

West Sussex County Council (Worthing: Lyons Way) (Prohibition of Driving) Order 2015 (the "Order")

We act for Hargreaves, the owners of land off Lyons Way, Worthing, to the north of Worthing Football Club and Lyons Way industrial estate.

On behalf of our client, we object strongly to the making of the above Order.

As currently drafted, the Order would prevent any vehicles driving along the section of Lyons Way hatched red on the plan attached to the Order and described in the Schedule to the Order. The effect of this would be to prevent the owners of land adjacent to that section of Lyons Way from accessing their property by vehicles. Our client is one of the owners that would be affected in that way.

This would be a serious and entirely unacceptable interference with our client's rights, and would be disproportionate to the Council's stated aim of seeking to prevent unlawful encampments. The Order would have a serious effect on land values of the affected land, as any business or future development would depend on there being unrestricted vehicular access, as is currently enjoyed.

We question whether authority exists for the Order to be made on the terms proposed. The statement of reasons, which we assume reflects the Council's intentions and authority for making the Order, states that "The Order will contain an exemption for vehicles accessing adjacent land with the consent of the landowners...". However, that exemption does not appear in the draft Order.

In addition, section 3 of the Road Traffic Regulation Act 1984 prohibits the making of a traffic regulation order which would have the effect of "preventing for more than 8 hours in any period of 24 hours access for vehicles of any class to any premises situated on or adjacent to the road". None of the exceptions in section 3(2) of the Act would apply.

Accordingly, the making of the Order as drafted would be unlawful and should not proceed.

Whilst our client objects to any order being made, should the Council decide to make a new order restricting vehicular access along Lyons Way, our client requests that wording is inserted to allow for all existing and future owners/occupiers to access their land adjacent to the road. This could be achieved by adding a new paragraph 4.(f), as follows:

WB1\10360855\1

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DX 166 London Chancery Lane | www.wedlakebell.com

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TELEFA
Associated offices
throughout Europe

Wedlake Bell

Continuation /2

"(f) with the permission of any current or future owners and/or occupiers of land adjacent to the length of the road specified in the Schedule to this Order."

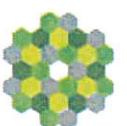
Yours faithfully

Wedlake Bell LLP
WEDLAKE BELL LLP

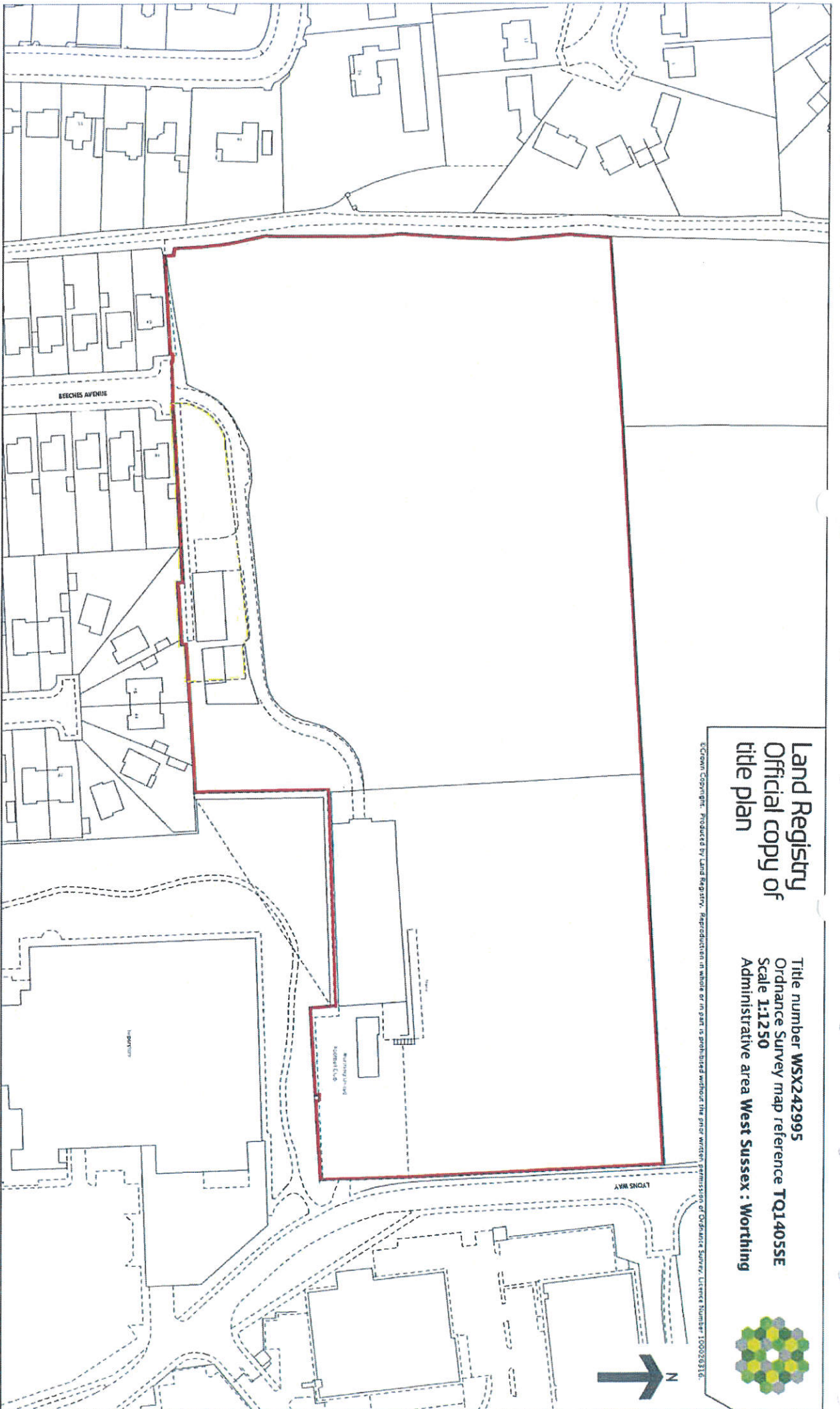
Annex B
Plan

Land Registry
Official copy of
title plan

Title number WSX242995
Ordnance Survey map reference TQ14055E
Scale 1:1250
Administrative area West Sussex : Worthing



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Annex C
Traffic Regulation Order

WEST SUSSEX COUTY COUNCIL
(WORTHING: LYONS WAY) (PROHIBITION OF DRIVING)
ORDER 2015

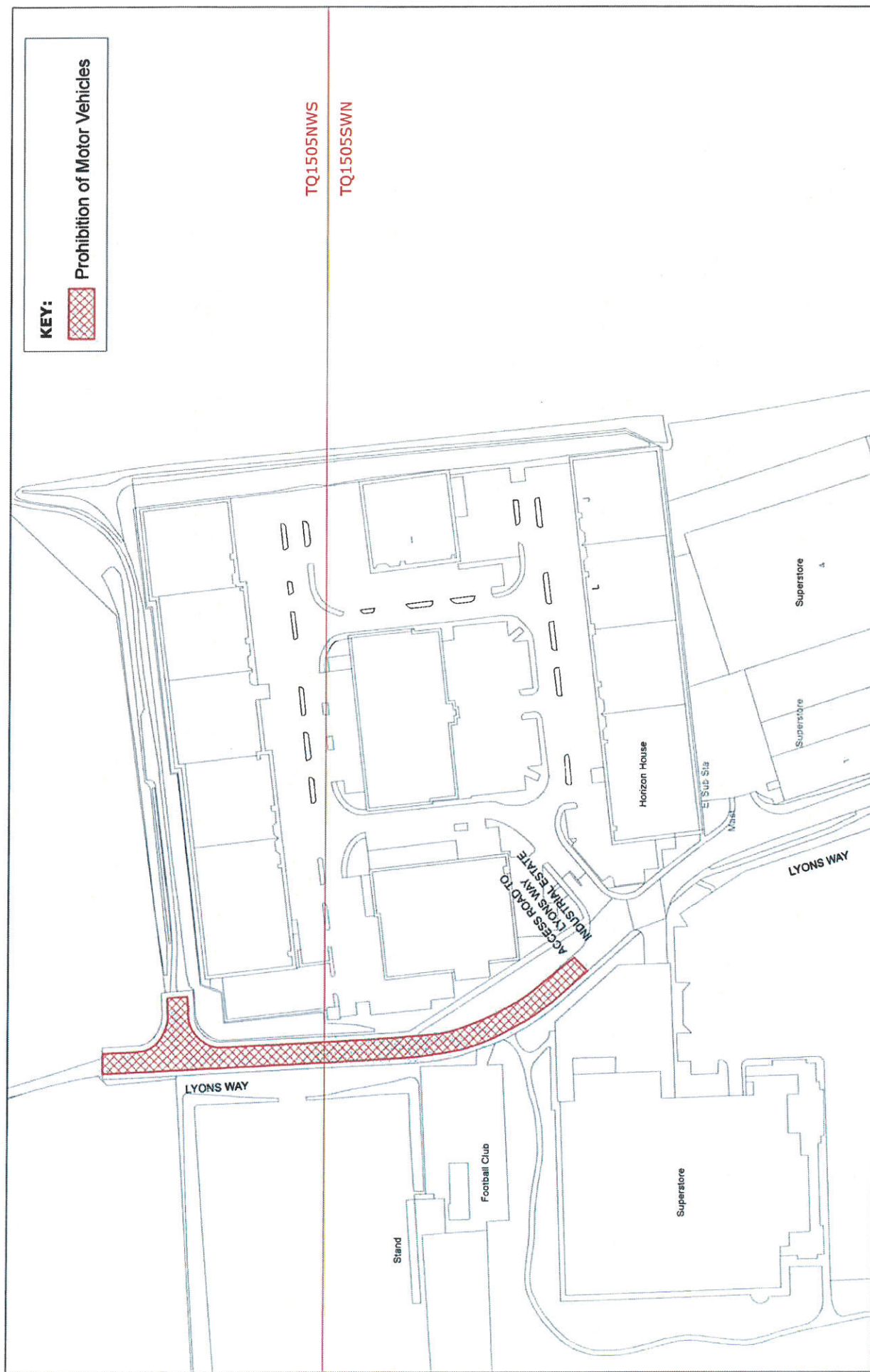
West Sussex County Council in exercise of their powers under Sections 1 (1) 2 (1) and (2), 4 (1), of the Road Traffic Regulation Act 1984 ("the Act") as amended and of all other enabling powers and after consultation with the Chief Officer of Police in accordance with Part III of Schedule 9 to the Act hereby make the following Order:-

PART 1
GENERAL

1. This Order shall come into operation on the ** day of ***** 2015 and may be cited as "West Sussex County Council (Worthing: Lyons Way) (Prohibition of Driving) Order 2015" hereinafter called "this Order".
2. The prohibitions imposed by this Order shall be in addition to and not in derogation from any restriction imposed by any regulations made or having effect as if made under the Act or by or under an enactment.

PART 2
Prohibition of Driving Provisions

3. Save as provided in Articles 4 and 5, no person shall cause or permit any motor vehicle to proceed on the length of road specified in the Schedule to this Order.
4. Nothing in Article 3 shall apply in respect of a motor vehicle being used:-
 - (a) For ambulance, fire brigade or police purposes in the event of an emergency; or
 - (b) With the permission or upon the direction of a police officer in uniform; or
 - (c) (with the prior permission of the Council) in connection with the laying, erection, inspection, maintenance, alteration, repair, renewal on or near the said roads of any sewer pipe, conduit, wire, cable or other apparatus for the supply of gas, water, electricity or of any telecommunications apparatus as defined in Schedule 2 of the Telecommunications Act 1984 resulting from works or an emergency; or
 - (d) In the service of a local authority in pursuance of its statutory powers; or
 - (e) In association with an event for which a road closure order under the Town Police Clauses Act 1847 has been made by Worthing Borough Council; or
 - (f) With the permission of any current or future owners and/or occupiers of land adjacent to the length of the road specified in the Schedule to this Order.
5. Nothing in Article 3 shall apply to a motor vehicle being used by a person proceeding in the affected length of road by arrangement with the West Sussex County Council Highway Manager, or by arrangement with a person authorised by the West Sussex County Council Highway Manager to confer such an arrangement on their behalf.



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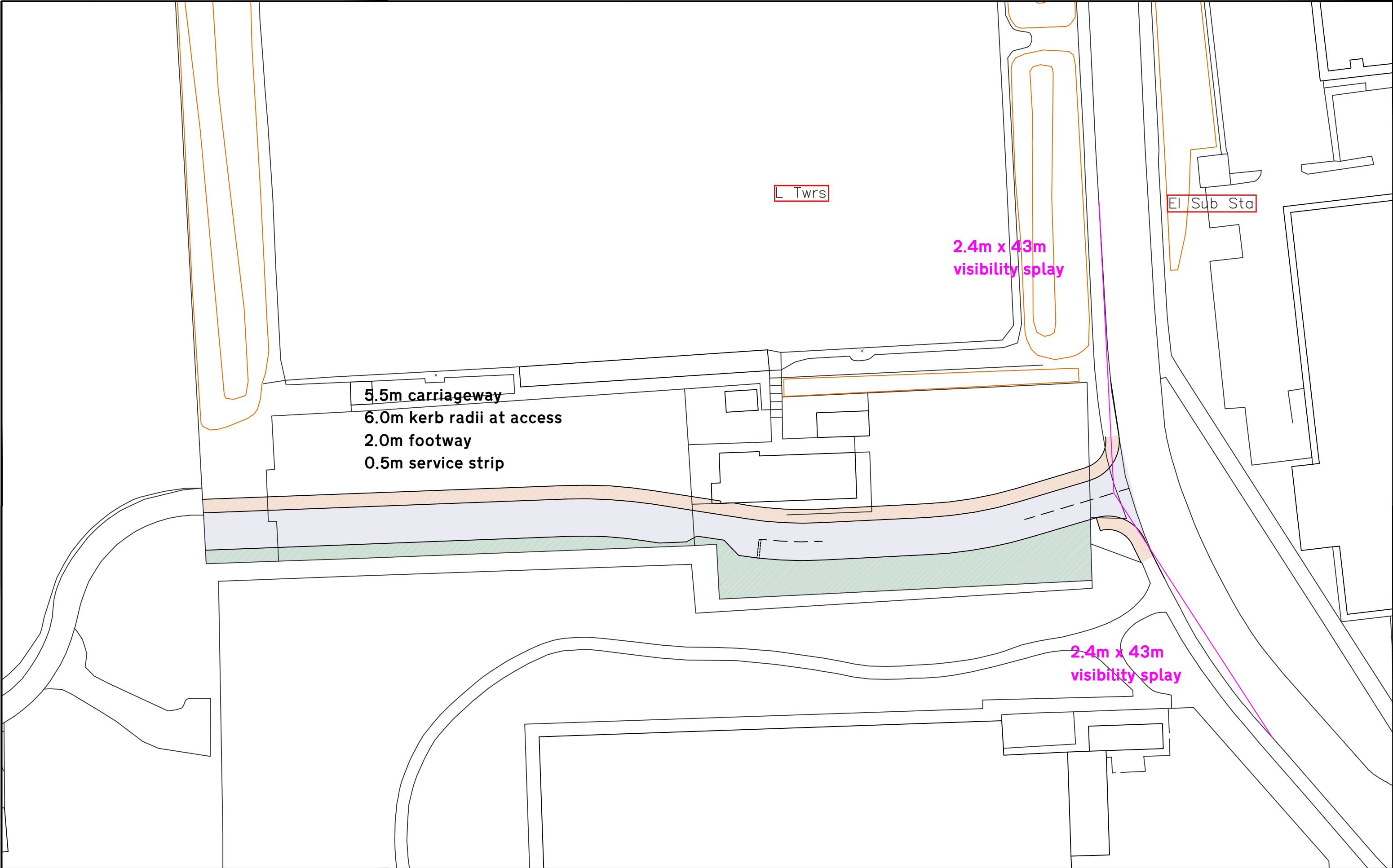
WORTHING - OFFINGTON WARD
 LYONS WAY
 PROPOSED PROHIBITION OF MOTOR VEHICLES (03.02.2015)

WOR8008
 SCALE: 1:1,250 @ A3 size



APPENDIX B


Proposed Access Arrangement



Based upon the ORDNANCE SURVEY MAPS with the permission of
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REV	DESCRIPTION	DRAWN	INITIALS	DATE	DRAWING STATUS	CHECKED BY	DATE



david tucker associates
transport planning consultants

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Fax: +44(0)1564 793983
www.dtatransportation.co.uk

JOB TITLE	Beeches Avenue, Worthing	CLIENT	Hargreaves
DRAWING TITLE			
Proposed Site Access			
SCALE	1/500@A3	DRAWN BY	BP
DATE	Nov18	DRAWING No	14047-02
REVISION			A



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www.dtatransportation.co.uk

REG 18 CONSULTATION OCT 31st – 12th Dec 2018

Representation

Name	Nadeem Shad
Organisation	Adur & Worthing Councils

General comments

I make the following comments in relation to **Policy CP23 Pollution & Contamination** within the Draft Local Plan, with particular reference to air quality.

Para 4.273 - should this also include reference to artificial light - i.e. "...unacceptable levels of soil, air, water, artificial light or noise..."?

Para 4.274 - reference to EU Limit Values should read "EU Air Quality Limit Values"; reference to national objectives for pollutants should read "national objectives for air pollutants".

Para 4.275 - There should also be reference to Particulates, particularly PM2.5, which is recognised by Defra as a pollutant of growing concern and will become one of the main focuses of local air quality as emissions from traffic reduce over the coming decade. Evidence exists to show that PM2.5 emissions are having a significant impact on human health. As such it is important there is some reference to it in the Local Plan.

Para 4.276 - In addition (and related to the previous mention of PM2.5 emissions), point sources such as biomass boilers and wood burners (both domestic and commercial) can have a significant impact on levels of particulates, particularly PM2.5, so this should be included as air quality assessments may need to include an assessment of the impacts from these.

Para 4.277 - The planning guidance 'Air Quality and Emissions Mitigation Guidance for Sussex' is revised and updated regularly. A new version is due by February 2019, so I recommend reference to the year is removed so that it does not refer to our of date Guidance. The first sentence should read "Sussex Local Authorities have developed planning guidance to help address air quality in relation to new developments across Sussex: Air Quality and Emissions Mitigation Guidance for Sussex (Sussex Air Quality Partnership)." Also, the Breathing Better document is for Sussex Authorities rather than guidance for developers, although I agree some mention of it should be retained.

Para 4.279 - Air Quality Assessments may be required for major development anywhere within the Borough to avoid public health impacts and risk creating new air quality problems outside of the existing AQMA. I also recommend reference to cumulative impacts be changed to "Any assessments should include an assessment of the cumulative impacts from individual sites in the area." Again I recommend removing the year when referring to the Air Quality and Emissions Mitigation Guidance.

Para 4.2780 - I recommend this be included - "Developments shall be expected to maximise opportunities to improve local air quality through appropriate design and mitigate impacts on local air quality."

The 'Air Quality and Emissions Mitigation Guidance for Sussex' is something we would like to see incorporated into a formal SPD if possible and would be happy to discuss this with you further.

With reference to **Policy CP24 Transport and Connectivity**, in Para 4.294 you should also mention that the Worthing Air Quality Action Plan supports sustainable transport measures as one of its key deliverable.

I also recommend that developers are encouraged to consider the impacts on air quality alongside transport at the design stage in order to minimise the impact on local air quality and encourage sustainable transport measures. Developers should be advised to discuss air quality and transport issues with the Local Planning Authority and Local Highway Authority at the earliest opportunity.

I suggest reference be made to the new West Sussex Parking Standards which are imminent and require the provision of electric vehicle charge points at a defined rate.

I recommend a link be provided between Policy CP23 Pollution & Contamination and Policy CP24 Transport and Connectivity, with particular reference to air quality and noise.

Finally **Policy CP7: Health** should also reference noise and air quality as impacting public health. Reference to the Worthing Air Quality Action Plan could also be used in support of providing healthy and sustainable communities.

REG 18 CONSULTATION OCT 31st – 12th Dec 2018

Representation

Name	Nadeem Shad
Organisation	Adur & Worthing Councils

General comments

The following comments are made in relation to **Policy CP23 Pollution & Contamination** within the Draft Local Plan, with particular reference to contaminated land.

What the policy needs to do.

4.273 The Local Plan should prevent development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.

4.274 According to the NPPF, planning policies should ensure that new development is appropriate for its location and that business should not have unreasonable restrictions put on them as a result of changes in development. Development should not give rise to Regulation 18 | Draft Worthing Local Plan 159 significant adverse impacts on health and quality of life such as through odour or noise and areas of **tranquility** (**there's one 'I' too many in the draft**) should be protected. Adequate site investigation information should accompany planning applications and any remediation required should ensure that the land is **suitable for its proposed use**. Development should sustain compliance with and contribute towards EU Limit Values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites.

Contaminated Land

4.281 Development of brownfield sites can help regenerate areas and enhance the natural and local environment by remediating and mitigating despoiled, degraded, derelict, contaminated **and unstable (remove - not us)** land. In accordance with national planning policy, where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner. All potentially contaminated land should be remediated prior to development and/or during construction to a level appropriate to its proposed use. In order to achieve this, investigations and assessments of all sites situated on or in close proximity to potentially

contaminated land will be required and site investigation information will be required to be submitted with a planning application. **Properties which may be affected by the presence of asbestos will also require submission of a risk assessment and if necessary, appropriate management and/or remedial plans.** The purpose of these investigations and assessments is to ascertain whether the land poses potential risk to human health and the environment, and if necessary outline remedial measures and future monitoring to mitigate and monitor the risk. All investigations of potentially contaminated land should be carried out following the Model Procedures for the management of land contamination (CLR11) and British Standard 10175:2011 - Investigation of potentially contaminated sites (Code of Practice).

JAL

12 December 2018

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

REFERENCE

DWLP-M-96

Date received: 12/12/2018

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London SW1Y 6DN

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info@rapleys.com
rapleys.com

LONDON
BIRMINGHAM
BRISTOL
EDINBURGH
HUNTINGDON
MANCHESTER

Dear Sir/Madam

Re: Draft Worthing Local Plan Consultation (October 2018) – Representations on behalf of EM Goring Ltd

As you are aware, we provide planning consultancy advice to EM Goring Ltd, owners of land to the read of Martlets Way ('the site' – see attached Site Location Plan). Our client is currently in active discussions with SGN, the landowner of the adjacent former Gas Holder site in the interests bringing forward development at the earliest possible juncture. Evidently the outcome of these discussions cannot be definitively predicted, however at this stage it is envisaged that the two sites will come forward either as a comprehensive development, or as part of a phased complementary set of proposals.

We have engaged with your authority relative to this site on a number of occasions, most recently in February this year, when we provided detailed representations and additional supporting information (including information relating to viability) in the interests of confirming the development potential of the site. These representations, in essence, confirmed that the site was capable of accommodating mixed use development, made up of predominantly residential development in order to support an element of employment floorspace.

In terms of the latter, it was confirmed that commercial development on the site in isolation is unviable, and that employment floorspace is only viable in the context of residential development to support it. Further, it was also confirmed that the most viable development options for the site (which would, accordingly, provide the greatest level of affordable housing) all involve a single use: residential.

Within the latest draft of the Local Plan, currently out to consultation, our client's site is included within Policy AOC6, alongside the aforementioned neighbouring former Gas Holder site.

Our client supports the development requirements set out in this policy, in particular:

- Providing mixed-use development of employment and residential uses;
- Ensuring that the layout and access arrangement for any development does not constrain or prevent the ability of development to come forward elsewhere within the site as a whole; and
- Considering the potential for a comprehensive redevelopment with AOC5 to the east of the site.

However, as it is currently drafted, the policy is unsound in terms of the identified indicative capacity of development, as:

- It does not include residential development; and

RAPLEYS LLP IS REGISTERED AS A
LIMITED LIABILITY PARTNERSHIP
IN ENGLAND AND WALES

REGISTRATION NO: OC308311

REGISTERED OFFICE:
FALCON ROAD, HINCHINGBROOKE
BUSINESS PARK, HUNTINGDON
PE29 5FG

REGULATED BY RICS

- The level of employment floorspace is too high.

The indicative capacity should be amended to make allowance for residential development and lower the level of employment development on the site, not least as the latter is only viable if brought forward with a substantially larger quantum of residential development. Further:

- The District has an acute shortage of housing land, reflected in the fact that in its largest published annual monitoring report only a 2.4 year housing supply is identified;
- The site, located close to local centres and Durrington railway station, is in a highly sustainable location for high-density residential development; and
- High-density residential development offers the best opportunities to provide the maximum level of affordable housing.

Further, the policy should be amended to make it clear that employment generating uses, beyond those falling in B Class uses (for example care home facilities) will be supported on the site. This is necessary to reflect:

- The lack of viability of B class uses in the current market;
- Due to changes in the demography and the economy, recognition that employment growth is increasingly being focused within non B class uses; and
- That non B class uses often have the capacity for generating more jobs, for example, a Class C2 care home in comparison to a Class B8 warehouse.

Finally, whilst writing, it should be noted that our client and SGN are also in active discussions with the promoter of the adjacent former HMRC site (allocated for development by draft policy AOC5) in the interests of considering a comprehensive solution relative to the three sites. It is considered that, if the three sites could be brought forward on a comprehensive basis, they could deliver increased levels of residential development than might be possible if there were developed separately. Correspondingly, a larger quantum of residential development not only offers the potential to deliver higher levels of affordable housing, but could also support a much larger amount of employment floor space than might otherwise be the case.

I trust that the above is self-explanatory, but if there are any questions or comments please contact Jason Lowes using the details below.

Yours sincerely,

Jason Lowes

Jason Lowes (Dec 12, 2018)

Jason Lowes
BSc (Hons) DipTP MRTPI
Partner - Town Planning
jason.lowes@rapleys.com
07899 963 524

KEY TO DRAWINGS

- Site Boundry
- Existing Buildings



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Client's Name
Greg Burton
Job Title
Land North of Juno Close, Goring, Worthing

Drawing Title
Location Plan
Scale
1:1250 @ A3
metres 10 20 30 40 50

Drawn	Checked	Date
OC	MN/AK	20.09.16
Job No	Drawing No	Rev
6218	LOC 1	A
Status	APPROVAL	

Rev	Date	Revision Details	Dr	Ch
<div><div></div><div>London: Unit 1, West Coate, House 3 Coate Street, London, E2 9AG T 020 7729 5505 E london@ecearchitecture.com Sussex: Brooklyn Chambers, 11 Goring Road Worthing, West Sussex, BN12 4AP T 01903 248777 E sussex@ecearchitecture.com Bristol: Westworks, St. Nicholas House 31-34 High Street, Bristol, BS1 2AW T 0117 315 8557 E bristol@ecwestworks.com www.ecearchitecture.com</div></div>				

CAD Plot date: 12/10/2016 - 15:15:16

Office use Only:	
Comment number	
Date received	

Draft Local Plan for Worthing Consultation Document October 2018 Comments Form

**This consultation runs from Wednesday 31st October
to 5pm on Wednesday 12th December 2018**

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

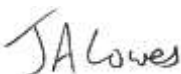
Email: Please email this completed form to worthinglocalplan@adur-worthing.gov.uk

Phone: 01273 263000

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

Section A - Contact Details

First name	Jason		
Last name	Lowes		
Organisation	Rapleys LLP, on behalf of EM Goring Ltd		
Address line 1	33 Jermyn Street		
Address line 2			
Town	London		
Postcode	SW1Y 6DN	Telephone	
Email address	Jason.lowes@rapleys.com		

Name	Jason Lowes	Date	12 December 2018
Signed			

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.

Note: Unless you request otherwise (by putting a cross in the box to the right), all respondents will be added to the Worthing Local Plan consultee database and will be notified at all subsequent stages of Local Plan progression.	No: please don't add me	
--	-------------------------------	--

In addition, if you would like to subscribe to the Worthing Planning Policy Newsletter (which covers a wide range of Planning Policy issues) then please put a cross in this box:	x
---	---

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. However, contact details will not be published. Unfortunately, we cannot accept or report confidential or anonymous responses. Further information about how personal information is processed can be found on the Council's website in the Planning Policy Privacy Notice:

<https://www.adur-worthing.gov.uk/planning-policy/privacy-notice/>

All data will be stored securely in line with the GDPR.

SECTION B – COMMENTS

As set out below, this consultation document is formed of four parts. It would be helpful if you provide your comments under the relevant sections together with relevant policy number, paragraph and page numbers. However, if your comments are more general then your comments can be inserted in the box below.

GENERAL COMMENTS

Representations are made in respect of site allocation AOC6: Martlets Way, please see covering letter for further information.

This box is a fixed size - please continue on separate sheet(s) at the end if necessary

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 1 - INTRODUCTION AND CONTEXT

(this 'part' includes characteristics of the borough/issues and challenges and vision & strategic objectives)

See attached covering letter

PART 2 - SPATIAL STRATEGY

(this 'part' sets out the proposed spatial strategy (what development and where) and the policies to deliver it)

See attached covering letter

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 3 - DEVELOPMENT SITES

(this 'part' includes details of the proposed future development sites)

See attached covering letter

PART 4 CORE POLICIES - HOMES AND NEIGHBOURHOODS (Policies CPI – CP6)

See attached covering letter

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

**PART 4 CORE POLICIES – SUSTAINABLE COMMUNITIES
(Policies CP7 – CPI0)**

See attached covering letter

**PART 4 CORE POLICIES – LOCAL ECONOMY
(Policies CPI1 – CPI4)**

See attached covering letter

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

**PART 4 CORE POLICIES – HISTORIC ENVIRONMENT
(Policies CPI5 – CPI6)**

See attached covering letter

**PART 4 CORE POLICIES – ENVIRONMENT AND CLIMATE CHANGE
(Policies CPI7 – CP23)**

See attached covering letter

This box is a fixed size - please continue on separate sheet(s) at the end if necessary

**PART 4 CORE POLICIES – TRANSPORT AND CONNECTIVITY
(Policies CP24 – CP25)**

See attached covering letter

This box will grow to allow you to add extra comments

**Additional comments continuation sheet(s) -
please mark clearly which section your comments carry on from**

Draft Local Plan for Worthing Consultation Document October 2018 Comments Form

**This consultation runs from Wednesday 31st October
 to 5pm on Wednesday 12th December 2018**

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

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

Phone: 01273 263000

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

Section A - Contact Details

First name	PHILIP WRIGHT		
Last name	WRIGHT		
Organisation			
Address line 1			
Address line 2			
Town			
Postcode		Telephone	
Email address			

Name	PHILIP WRIGHT	Date	12/12/18
Signed			

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.

Note: Unless you request otherwise (by putting a cross in the box to the right), all respondents will be added to the Worthing Local Plan consultee database and will be notified at all subsequent stages of Local Plan progression.	No: please don't add me	
--	-------------------------------	--

In addition, if you would like to subscribe to the Worthing Planning Policy Newsletter (which covers a wide range of Planning Policy issues) then please put a cross in this box:	<input checked="checked" type="checkbox"/>
---	--

PART 3 - DEVELOPMENT SITES

(this 'part' includes details of the proposed future development sites)

Acc 4: Comments: 1) Reference is made to providing alternative access to the site. Alternative access points include a) the top of Ross Road. However, this is within a residential area, West Park Lane & Ross Road frequently have cars parked on both sides of the road making access via this route potentially dangerous, particularly as these roads are used by vehicles (often at speed) avoiding the traffic lights at the junction of Shaftesbury Ave and Crony Road; b) Bruce Avenue to the Scout Hut but this is a dangerous area with cars parked on both sides of the road around the corner; c) at the top of George V Avenue but this would impact the allotment site.

2) Reference is made regarding reducing noise from the railway line. However this should extend to reducing noise from the leisure centre as it is not unusual to hear loud noise from exercise classes during the day and from evening events.

3) Reference is made about easement. The planners will be aware of the development at the former Lloyd's Tower, Flat 2 next door, the old sixth form college site, adjacent to the petrol station in Shaftesbury and the

PART 4 CORE POLICIES - HOMES AND NEIGHBOURHOODS

(Policies CPI - CP6)

planned development at Barrington (HMEC offices)
This places ~~the~~ pressure on local roads, schools, GPs and other social services. I am not aware of any additional Medical & educational facilities. New developments must provide adequate facilities to park cars, preferably with car charging points to promote take up of electric vehicles.

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	Peter & Christine King
------	------------------------

General comments

The Goring Gap North and Goring Gap South must be protected at all costs. It must continue as a Local Green Space and as a Strategic Gap between Goring and Ferring (known as Chatsmore Farm) (SP5 & SP6). This area must remain a local green space.

12 December 2018

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

REFERENCE

DWLP-M -99

Date received: 12/12/2018

Dear Sir/Madam

Re: Draft Worthing Local Plan Consultation (October 2018) – Joint representations on behalf of EM Goring Ltd, SGN and Mapeley STEPs Ltd

These representations are submitted on behalf of EM Goring Ltd, SGN and Mapeley STEPS Ltd in the following respective capacities:

- EM Goring as owners of the land at Martlets Way (part of site allocation AOC6);
- SGN as owners of the former Gas Holder site (part of site allocation AOC6), and
- Mapeley STEPS Ltd as owners of the HMRC site (site allocation AOC5).

Site plans of each site are attached to these representations, and as you will be aware the indicative capacity of each allocation within the current draft of the local plan is:

- Allocation AOC5 – 250 residential units and 2,500sqm B1 Use Class floorspace, and
- Allocation AOC6 – 10,000sqm of “employment” floorspace.

All three parties have submitted representations relative to the three sites, addressing development of each site allocation in its own terms. However, also as confirmed within the representations, the three parties are currently exploring a comprehensive solution. This might result in maximising the development potential of the combined sites in the context of the following matters:

- The ability to develop a larger quantum of residential development would assist in bringing forward a significant level of employment development;
- The District has an acute shortage of housing land, reflected in the fact that in its latest published annual monitoring report only a 2.4 year housing supply is identified and, as a result, the level of residential development indicated within the allocations is too low;
- The site, located close to local centres and Durrington railway station, is in a highly sustainable location for high-density residential development, and High-density residential development offers an opportunity to provide supporting infrastructure including affordable housing.

It is considered that a combined approach across the three landholdings offers the potential to substantially increase the quantum of achievable development in comparison to what would be possible on each site in isolation. Such an approach could provide the following benefits:

- It could provide a substantially higher quantum of housing than that indicated within the current draft local plan, thereby meeting an evident need in a very sustainable location;
- It could provide an increased contribution to local affordable housing stock, and
- Although it is still considered unlikely that the level of employment generating floorspace indicated in the current draft of the local plan is viably achievable, a co-ordinated approach could assist in its delivery.

We trust that the above is self-explanatory, and will be given full consideration. In the coming months, we intend to work with our representatives in order to explore comprehensive development options. We also intend to provide the local authority with regular updates of the progress of these discussions.

Yours faithfully

A handwritten signature in black ink that reads "JALowes". The letters are cursive and slightly slanted to the right.

Jason Lowes

Rapleys LLP (on behalf of EM Goring Ltd)

A handwritten signature in black ink that reads "Adam Conchie". The signature is written in a cursive, flowing style.

Adam Conchie

Carter Jonas (on behalf of SGN)

A handwritten signature in black ink that reads "John Cohu". The signature is written in a cursive, flowing style.

John Cohu

Montagu Evans (on behalf of Mapeley STEPS Ltd)

Existing Buildings

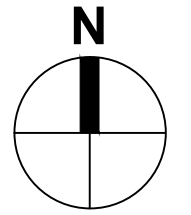


London: Unit 1, West Coate, House
3 Coate Street, London, E2 9AG
T 020 7729 5505 E london@ecearchitecture.com

Sussex: Brooklyn Chambers, 11 Goring Road
Worthing, West Sussex, BN12 4AP
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31-34 High Street, Bristol, BS1 2AW
T 0117 315 8557 E bristol@ecwestworks.com

ECE Architecture
www.ecearchitecture.com



Scale

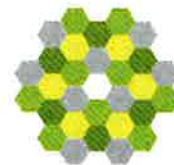
1:1250 @ A3



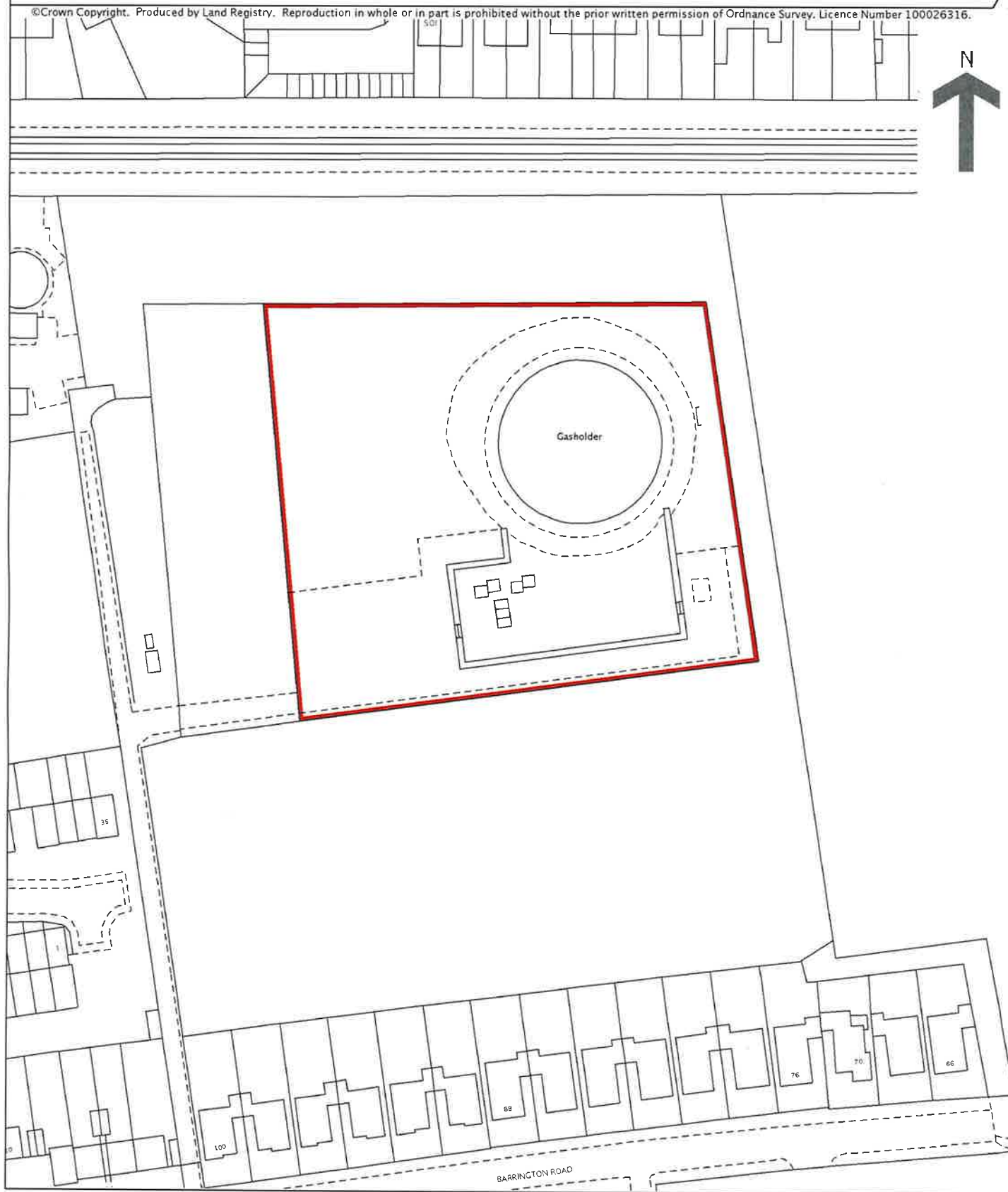
A horizontal scale bar with alternating black and white segments. Below the bar, the word 'metres' is written on the left, and the numbers 10, 20, 30, 40, and 50 are placed at regular intervals along the bar.

Land Registry Official copy of title plan

Title number **WSX257366**
Ordnance Survey map reference **TQ1103SE**
Scale **1:1250**
Administrative area **West Sussex : Worthing**



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REFERENCE

DWLP-M -100

Date received: 12/12/2018

Please reply to:

Tel: 01293 886446

Email: tricia.butcher@gmail.com

Sent by email to:

Worthinglocalplan@adur-worthing.gov.uk

12th December 2018

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. Its 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. On behalf of The Society I would like to make the following comments:

Worthing Draft Local Plan Consultation

The Countryside (page 26)

Para 2.42 - There is a commitment in the wording to protect and enhance countryside, including 'green infrastructure', which we absolutely support, especially as 'green infrastructure' includes public rights of way (proW). Multi-use proW can provide connectivity for all users, especially on the urban fringe, where most equestrians will be located, and provide benefits for leisure and recreation, tourism, health and wellbeing, wildlife and biodiversity.

We are also pleased to see mention of 'horse related activity' in this para, in addition to walking and cycling. Whilst there is a great need for more housing development in the area, the increasing amount of traffic brought onto the roads by such development, roads that all non-motorised users (NMUs), and especially horse riders have always had to use because of the lack of bridleways (multi-use routes) on the Coastal Plain, has resulted in vulnerable road users now feeling unsafe, and in need of protection.

SP4 Countryside and Undeveloped Coast

f) – the aims here are very much supported, especially improving access to the National Park for NMUs. The A27 is a significant barrier to Park access, and safe grade-separated crossings are much needed, but and provision of such crossings must include connections to the wider network of proW.

SP5 Local Green Gaps

a) The designation of these areas as Local Green Gaps is welcomed, they will be of great value to the health and wellbeing of all residents, and provide areas for quiet informal recreation.

Local Green Space (page 32)

Para 2.66 – On the Coastal Plain there are hardly any historic bridleways, which makes Ilex Avenue (bridleway number 3111) very important as a multi-use recreational route. We would like to see every opportunity taken to create links, either by using quiet roads or new paths, to link this bridleway with other multi-use roads and green spaces/gaps to provide connectivity.

SP6 Local Green Space (page 36)

The Policy is supported and welcomed for the provision of areas for quiet, informal recreation.

A4 Decoy Farm, East Worthing (page 51)

In Development Requirements, 5th bullet point – the aims are welcomed, and to provide connectivity for NMUs on the Coastal Plain, this should include creating a link from Restricted Byway 3733 to Loose Lane to the east.

CP7 Healthy Communities (page 102)

a) i.- aims here are welcomed, but the importance of informal recreation is thought to be underestimated. Safe active travel routes are good, but so are leisure and recreational routes (for walking, dog walking, cycling, horse riding, etc.), being active for leisure is the ‘gateway’ to walking/cycling to work.

CP8 Open Space, Recreation and Leisure (page 103)

Supporting Text – the overall aims and wording in paras 4.95 to 4.98 are supported, however we believe that informal recreation should have a much higher profile and be specifically mentioned, and not just ‘recreational facilities’, which tend to be considered as ‘built’ facilities. A linking network of prows (not mentioned, but should be) and access routes available to all is highly valued by communities.

NPPF para 98 states *“Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks.”*

NPPF para 118 states *“Planning policies and decisions should encourage multiple benefits from both urban and rural land....taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation **or improve public access to the countryside.**”*

There is no mention anywhere in this Policy of equestrians (horse riding), but there are significant numbers on the urban fringes of Worthing.

CP8 - the Policy itself should require major development, especially on the edge of the town, to provide connectivity with at least one multi-user access route (prow) around the fringe, which would allow existing and future residents to access the wider countryside. Once again the lack of a network of informal leisure and recreational routes is not addressed.

Supporting Text (page 108)

Para 4.113 – whilst it is acknowledged in the wording that the list of infrastructure here is not ‘exhaustive’, we would have liked to see ‘public rights of way’ included, and would suggest this could be added in the brackets after ‘green infrastructure’ (including open space and public rights of way), especially as there is such a shortage on the Coastal Plain.

Green Infrastructure (page 151/152)

Supporting Text, para 4.251 – would like to have seen the wording for ‘the network’ include *public rights of way (green corridors)*.

CP20 Green Infrastructure (page 152/153)

This wording in this Policy is strongly supported.

CP24 Transport

Whilst we would support all references to improve facilities and safety for walkers and cyclists, it is disappointing that there is no mention in this Policy of an ambition to improve the safety of all vulnerable road users, which includes equestrians.

The West Sussex Transport Plan 2011 to 2026 (page 32) states that “*equestrians form a significant but vulnerable road user group which we will support and seek to protect.*”

b) iii – although supported, this aim to develop a network of routes, should where appropriate (likely on the urban fringe) include routes that can provide safety for equestrians. The WSTP in its Worthing – Implementation Plan (page 68) does also say WSCC will *support opportunities which will improve and protect the public rights of way network throughout the Borough.*” We would suggest that the best way to improve safety for all NMUs, is to provide a network of off-road multi-use path routes.

Also supported is the commitment to improving access across the A27 (which must be for all vulnerable road users), and better connectivity with the SDNP.

Yours faithfully

Tricia Butcher

County Access & Bridleways Officer (West Sussex)

REFERENCE

DWLP-M -101

Date received: 12/12/2018



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Congleton Business Park
Congleton, Cheshire
CW12 1LB

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www.gladman.co.uk

12th December 2018

EMAIL ONLY

Dear Sir/Madam,

Re: Worthing Borough Council – Draft Local Plan 2016-2033 – Regulation 18

Gladman write to offer some brief comments on the regulation 18 version of the emerging plan for Worthing. Gladman have employment and residential land interests across Sussex and have been involved in the preparation of many local plans across the region. We offer the comments below to provide assistance to the Council in developing a Local Plan which can provide for as much of its housing and employment needs as possible and which can be found sound at any future examination in public.

Given the stage of preparation of the Local Plan it is inevitable that the plan will be judged against the NPPF (2018), whilst there are a raft of changes from the NPPF (2012) within the document which the Council will need to be cognisant of in developing its emerging plan. Gladman wish to concentrate on issues relating to housing need in this letter. The chief elements we consider need addressing are the standard methodology figure, the interactions between the wider housing market area authorities (through the Duty to Cooperate) and what happens to the inevitable residual unmet housing need which cannot be accommodated in Worthing.

Gladman note from the Councils assessment and the currently drafted policies SP2 and SP3, alongside table1, that the current level of housing need through the standard methodology is 753 dwellings per annum, or 12,801 dwellings over the plan period from 2016-2033. Table 1 confirms that the plan delivery target will be just 246 dwellings per annum, leaving an unmet housing need of 507 dwellings per annum or 8,619 dwellings over the plan period. This is a very significant amount of unmet housing needs to which the Council will need to discuss with its neighbouring authorities, and possibly authorities which are further afield.

One of the key changes forthcoming through the NPPF (2018) and PPG are in relation to the way in which unmet housing needs are to be dealt with through the use of statements of common ground or memorandums of understanding between housing market area partnerships. The government is putting increased emphasis on ensuring that unmet housing needs are dealt with in its drive to solve the housing crisis and increase the level of housing built each year to 300,000 dwellings per annum. Whilst the existence of Local Strategic Statement 2 is noted, as is the preparation of Local Strategic Statement 3, at present these would not be sufficient to cover the new requirements of the PPG (Paragraph: 014 Reference ID: 2a-014-20180913 and NPPF. Whilst they identify housing needs to some extent, although not the levels indicated through the Standard Methodology, they do not adequately deal with the unmet housing needs arising from a number of the coastal authorities in Sussex.

Directors: D J Gladman BA, K J Gladman MCSP, SRP, J M S Shepherd BSc, CEng, MIEE, G K Edwards DipTP, MRTPI

VAT Registration No. 677 6792 63

Registered Address: Gladman House, Alexandria Way, Congleton Business Park, Congleton, Cheshire, CW12 1LB, Registration No. 3341567

The Council will need to ensure that through the Duty to Cooperate it seeks agreement across its HMA on the distribution of housing needs and the accommodation of unmet housing needs. Without an agreement on the distribution of these housing needs the plan risks being found unsound when it is the subject of examination.

Gladman would welcome the opportunity to continue to engage with the Council as the preparation of the Local Plan continues and would request to be kept informed of any forthcoming consultations and events with regard the development of the Local Plan.

Yours faithfully

Mathieu Evans
Planning Policy Director
Gladman Developments

Draft Local Plan for Worthing Consultation Document October 2018 Comments Form

**This consultation runs from Wednesday 31st October
to 5pm on Wednesday 12th December 2018**

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

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

Phone: 01273 263000

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

Section A - Contact Details

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Town	Camberley		
Postcode	GU15 3TQ	Telephone	01276 808080
Email address	Robert.clark@persimmonhomes.com		

Name	Robert Clark	Date	21.11.18
Signed	<i>Robert Clark</i>		

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.

Note: Unless you request otherwise (by putting a cross in the box to the right), all respondents will be added to the Worthing Local Plan consultee database and will be notified at all subsequent stages of Local Plan progression.	No: please don't add me
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In addition, if you would like to subscribe to the Worthing Planning Policy Newsletter (which covers a wide range of Planning Policy issues) then please put a cross in this box:	
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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. However, contact details will not be published. Unfortunately, we cannot accept or report confidential or anonymous responses. Further information about how personal information is processed can be found on the Council's website in the Planning Policy Privacy Notice:

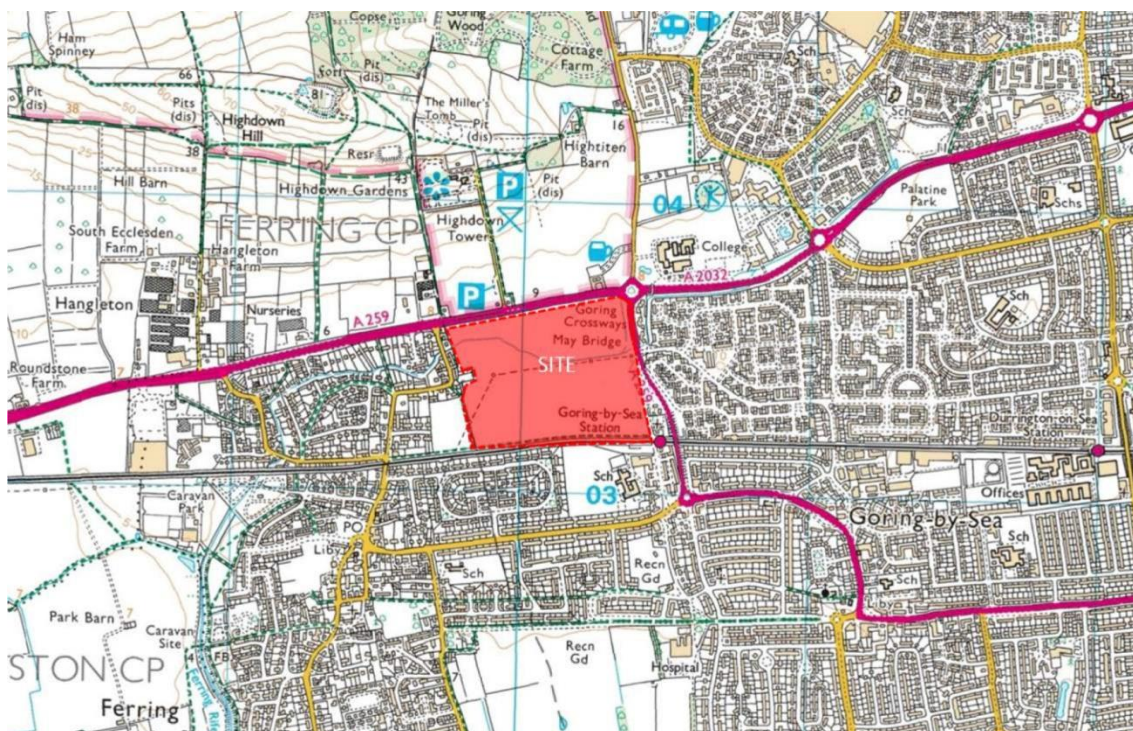
<https://www.adur-worthing.gov.uk/planning-policy/privacy-notice/>

All data will be stored securely in line with the GDPR.

SECTION B – COMMENTS

As set out below, this consultation document is formed of four parts. It would be helpful if you provide your comments under the relevant sections together with relevant policy number, paragraph and page numbers. However, if your comments are more general then your comments can be inserted in the box below.

We begin this response with focus on Persimmon's key interest – Chatsmore Farm



GENERAL COMMENTS: set out in the box below.

The Local Plan fails to make adequate provision for new housing and is unsound in terms of the obligations required under the NPPF 2018: achieving sustainable development... meeting the needs of the present and future generations in Worthing. Because the Local Plan's Strategy fails to respond to objectively assessed housing need (OAN), instead it over-constrains the residual land outside the National Park with Local Gap/ Local Green Space designations. The consequence is that there is only 2.9 years' supply of housing land; and, of that quantum, many of the Plan's scheduled sites are not readily deliverable.

In our view, this severe shortfall in supply is because the Plan takes a capacity-based approach on land outside the urban area. Instead, the Plan should, in an analogous way, adopt the tenets of the NPPF's approach to the Green Belt. At para. 138 LPA's are enjoined... *"When drawing up and reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. **And all options for first accommodating development should be fully examined.**"*

If we take that as an expressed national ethos, for restrictive land designations, it means that the Council should not be shutting down the potential opportunities for development by designating land as a local gap or as a local green space. That curtailment in development options leads inexorably to development obligations, especially housing, being unfulfilled – for present and future generations. That is a contradiction of Resolution 42/187 of the UN General Assembly. **Put plainly, the Plan expects, erroneously, to coast along at 246dpa when the OAN is 778 units per year.**

Furthermore, the Housing Supply Trajectory makes the point very clearly that this is an enduring problem of anticipated 10 years' duration:

2022/ 23.... 158 dwellings
2025/26.... 73 dwellings
2026/27.... 133 dwellings
2027/28.... 73 dwellings
2028/ 29.... 73 dwellings.

Manifestly, neither the first 5 years of the Plan and the period thereafter fail to get to grips with Worthing's development obligations. The severity and deep-seated nature of the problem is such that the constraints-led ethos needs to be turned on its head: **fulfil adequately local needs rather than constrain choice via local gap/ green space designations.** The National Park provides the lungs for the town, thus it is unnecessary to allocate Chatsmore Farm for quasi open space; Persimmon Homes will continue to press for the development configuration previously advocated – 520 new homes, POS, expansion of the Rail Station car park, a river corridor, and agriculture.

Moreover, we will continue to press forward for this site because, fundamentally, there is no substantive countryside/landscape difference between Chatsmore Farm and (1) the Caravan Club, (2) Fulbeck Avenue, (3) Upper Brighton Road. Additionally, Chatsmore Farm enjoys distinct transportation merits – in being adjacent to Goring Station/the A259 corridor/and being closer to the town centre, than the three designated sites.

Since the publication of the White paper, 'Fixing Our Broken Housing Market' central Government has been adamant that both national and local housing production has been far below that needed both as measured demographically and as measured through market signals – largely in terms of affordability ratio's. The political, social and planning importance of increasing housing output from the very low levels currently being achieved has permeated every facet of advice issued by DCLG and Ministerial speeches.

The overarching context for the Local Plan is the NPPF (March 2012) which highlights the need to boost significantly the supply of housing whilst the NPPF (July 2018) strengthens further the importance which Central Government attaches to increasing housing production since it was one of the primary reasons for reviewing the document with Paragraph 59 of the NPPF stating *"to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay"*. The draft Local Plan is contrary to this advice.

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Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART I - INTRODUCTION AND CONTEXT

(this 'part' includes characteristics of the borough/issues and challenges and vision & strategic objectives)

Response by Persimmon Homes set out below:

The starting point of the Draft Plan (should be) the NPPF 2018: in fulfilling, inter-alia, local housing needs, by being socially responsible. That means paying full regard to Worthing's OAN.

At its very least, (i) 538 dpa are required to fulfil **household growth**.
In addition to that figure, (ii) 785 dwellings per year are required for **affordable housing**.
Clearly, (iii) there is market demand over and above these two figures.

Instead, the Housing Implementation Strategy gives an OAN of 636 dpa, which through a series of WBC calculations is broadened, then massaged backwards to a cap of 778 dpa. Clearly, that amount pays scant regard to the household figure or to the affordable figure. In spite of that deficiency, the Draft Plan then goes on to drop the housing target to 4,182 dwellings in aggregate, or 246 dpa. **This is manifestly unsound in NPPF terms.**

The remedy to this gross under-supply should then be to look to neighbouring LPA's to accept part of Worthing's (unfulfilled) housing burden. But under that heading nothing has been achieved in the across-boundaries dialogue: Adur is 3,107 dwellings short of its own target; and Arun has been able to offer only 81 dpa to offset (cross cooperation) needs. Indeed, Arun District acknowledge it will fail to deliver its own housing target in the first 5 years of their plan period.

In light of that, the Draft Plan needs to begin the process of satisfying its OAN within the Borough and commence making allocations accordingly. **It is untenable to go forward on 246 dpa.**

That is a comment made in the light of para. 35 of the NPPF... "Plans are sound if they are positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed need." **The Plan's intention of accommodating only 33% of Worthing's housing needs is plainly in default of the National Guidance.**

PART 2 - SPATIAL STRATEGY

(this 'part' sets out the proposed spatial strategy (what development and where) and the policies to deliver it)

With the NPPF and OAN figures as the necessary anchor to the Plan, the Spatial Strategy needs to commence with Worthing Borough Council's need for a minimum of 12,801 dwellings/ 778dpa **to be fulfilled by land allocations**. Next, the allocations need to be in sustainable locations, where public transport is available. And beyond that remit, the spatial strategy should be biased to large site releases – as being the best opportunity to secure meaningful numbers of affordable housing.

It is entirely unsound for the Plan to proceed on the basis that it provides only 33% of the housing required in the Borough, an overall shortfall of 8,600 dwellings. Moreover, the inadequacy of this shortfall is exacerbated brutally if reference is made to WBC's affordable housing requirement – said to be **785 dwellings per annum**.

By any measure, the Spatial Strategy is inadequate; but in its dire response it fails to reflect the inability of neighbouring LPA's to assist, and secondly for Worthing to have opted for a capacity-based approach is deeply flawed. As a large portion of the Borough is in the National Park the remaining non-urban land needs to be freely assessed. The plan-making process should not commence with designation of Local Gap or Green Space designations.

Thus, we object to Persimmon's land at Chatsmore Farm being so designated: the site has considerable development utility and is adjacent to Goring Rail Station. It is unconscionable for the site to have been bounced into a no-development scenario when (i) WBC has made it plain that it has only **2.9 year' housing land supply and (ii) that there are no contingency housing sites**.

That supply assessment, inadequate as it is against the 5-year obligation, relies on several sites which, fundamentally, are countryside-based and yet have attributes which in no way are superior to Chatsmore Farm. We refer to (1) The Caravan Club, (2) Land west of Fulbeck Avenue, (3) Upper Brighton Road.

We also oppose the non-allocation of Chatsmore Farm in light of the complexity and multi-faceted issues applying to the allocated sites at Grafton/ Marine Parade; Union Place; Civic Centre Car Park and the Areas of Change (AOC) at Centenary House; BG at Lyndhurst Road; the Bus Depot; Barrington Road. The aggregate of 800 dwellings from these sources is, **by the Plan's own admission**, subject to further work... and will be taken up in the next Local Plan (para 2.28). Patently, the present Plan cannot afford to ignore the certainty of Chatsmore Farm's development in the context of 2.9 years' supply of housing land and the uncertainty of the afore-mentioned brownfield sites.

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 3 - DEVELOPMENT SITES

(this 'part' includes details of the proposed future development sites)

First, we note that the Plan sets out a Windfalls allowance of 949 dwellings, but there is an incipient contradiction in para. 1.37: in its reference to **protecting existing uses**, including employment sites, open spaces, and community facilities. There is a double contradiction in that many of the brownfield sites listed in the plan have these land use characteristics.

In the last paragraph of the response box above we set out the 7 mixed use sites included in the Plan. These are complex sites, with difficult configurations, problematic ground conditions, neighbour constraints, mixed-use aspirations and ownership handicaps that are very unlikely to deliver units in the first 5 years of the plan period, if at all. We are concerned that the yield proposed on these sites is unrealistic and an over reliance is being placed on complex brownfield sites that will not deliver the housing strategy. From that point of view the advice of para 7.2 of the NPPF is highly salient: LPA's should make a realistic assessment of likely rates of delivery for large scale sites. **As the Council acknowledge these difficulties at paragraph 2.28**, it should follow that through with making the said sites either contingency candidates, or earmark for allocation beyond the first 5 years of the Local Plan.

In fact, at para. 8.10 of the Housing Strategy paper there is a highly significant admission by WBC: **"The Council has been unable to identify contingency sites and build in flexibility to address the shortfall in meeting its objectively assessed need for housing."** Plainly, it would be prudent to displace the listed brownfield sites, as listed here, into a contingency category and substitute, inter-alia, Chatsmore Farm into the 5-year supply programme. The site is owned by a major housebuilder with a track record of building out consented schemes.

In support of the substitution, the latest guidance in the NPPF is seeking to ensure housing sites are deliverable and the Inspector in the recent Woolpit (Mid Sussex District) decision (PINS Ref: 3194926) states: *"The up-dated PPG on Housing and economic land availability assessment sets out guidance on what constitutes 'deliverable sites' and covers the evidence that a site with outline permission is expected to have in support of its inclusion in the supply. The PPG places great weight on the adequacy and sufficiency of consultation with those responsible for delivering dwellings. It is noteworthy that in this case, the Council has failed to adequately demonstrate it has done so. An assessment of the Council's AMR against the updated PPG reveals that the AMR falls substantially short of producing that evidence that a LPA is expected to produce"*.

As a result of this decision, the Governments emphasis is clearly moving toward 'deliverability' and the Council should provide clear evidence that its proposed housing sites can start to deliver within 5 years. It is Persimmon Homes view that the Councils housing strategy cannot demonstrate delivery and the delivery rates will be significantly slower than anticipated with the infrastructure, land, viability and build complexities of brownfield sites. Based on Persimmon Homes current experience, this is inevitable. Moreover, the suggested yield from allocated sites A5-A8 indicates these are flatted schemes (totalling 605 flats), and there is a genuine paucity of badly needed family housing proposed over the plan period which total some 248 units on allocated sites. The contribution from 'Areas of Change' (595 dwellings) cannot be relied upon to deliver housing for the reasons already stated, hence, Chatsmore Farm is an obvious substitute.

PART 4 CORE POLICIES - HOMES AND NEIGHBOURHOODS (Policies CPI – CP6)

No comment.

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 4 CORE POLICIES – SUSTAINABLE COMMUNITIES

(Policies CP7 – CPI0)

No comment.

**PART 4 CORE POLICIES – LOCAL ECONOMY
(Policies CPI1 – CPI4)**

No comment.

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

**PART 4 CORE POLICIES – HISTORIC ENVIRONMENT
(Policies CPI5 – CPI6)**

No comment.

**PART 4 CORE POLICIES – ENVIRONMENT AND CLIMATE CHANGE
(Policies CPI7 – CP23)**

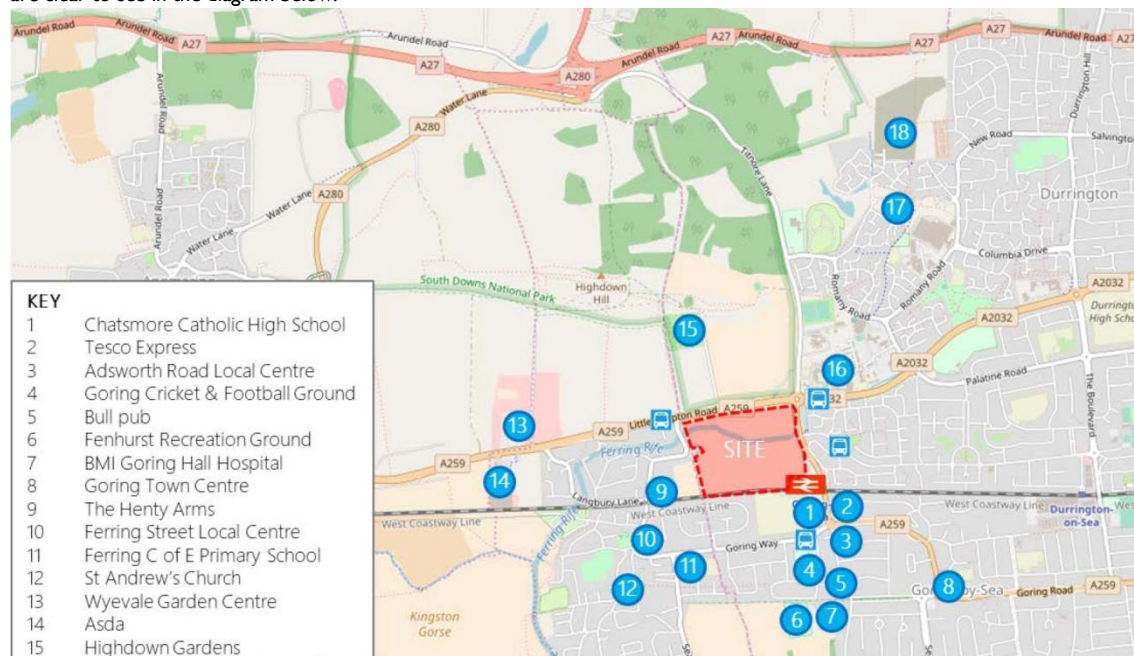
No comment.

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PART 4 CORE POLICIES – TRANSPORT AND CONNECTIVITY (Policies CP24 – CP25)

We endorse Policy EP24 – Transport and the statement *“WBC will promote and support development that encourages travel by walking, cycling and public transport, and reduces the proportion of journeys made by car.”*

That is precisely the reason for Persimmon’s call for Chatsmore Farm to be allocated for new housing, its merits and proximity to Goring Station are clear to see in the diagram below:



This box will grow to allow you to add extra comments

Additional comments continuation sheet(s) - please mark clearly which section your comments carry on from

Re: Issues and Challenges, Spatial Strategy, Development Capacity, Local Gap, Local Green Space

From the context of 24.1% of the land in the Borough being within the National Park, the Council shows, within the Plan, insufficient regard to the utility of that land to Borough residents: it provides the lungs of the Borough, open space, recreation, etc and enhances local quality of life. Ignoring these *“on the doorstep”* opportunities means that the Plan is flawed in seeking further park-like opportunities immediately on its boundaries.

That process by WBC has led to drawing **Chatsmore Farm** into a no-development designation. For the record, this is private land with no public access; albeit, there is a footpath confined to the edge of the railway. In short, there is no access to Ferring Rife, or any north to south, east to west direction through the fields.

Hence, the Plan’s inference that the local gap/ green space designation of the land consolidates its public utility and access is not accurate. Of course, Persimmon Homes has shown previously in its dialogue with WBC how public open space, the riverside corridor, and farmland can be combined with new housing. But that mixed use/ open space outcome has been ignored and receives no mention in the present Draft.

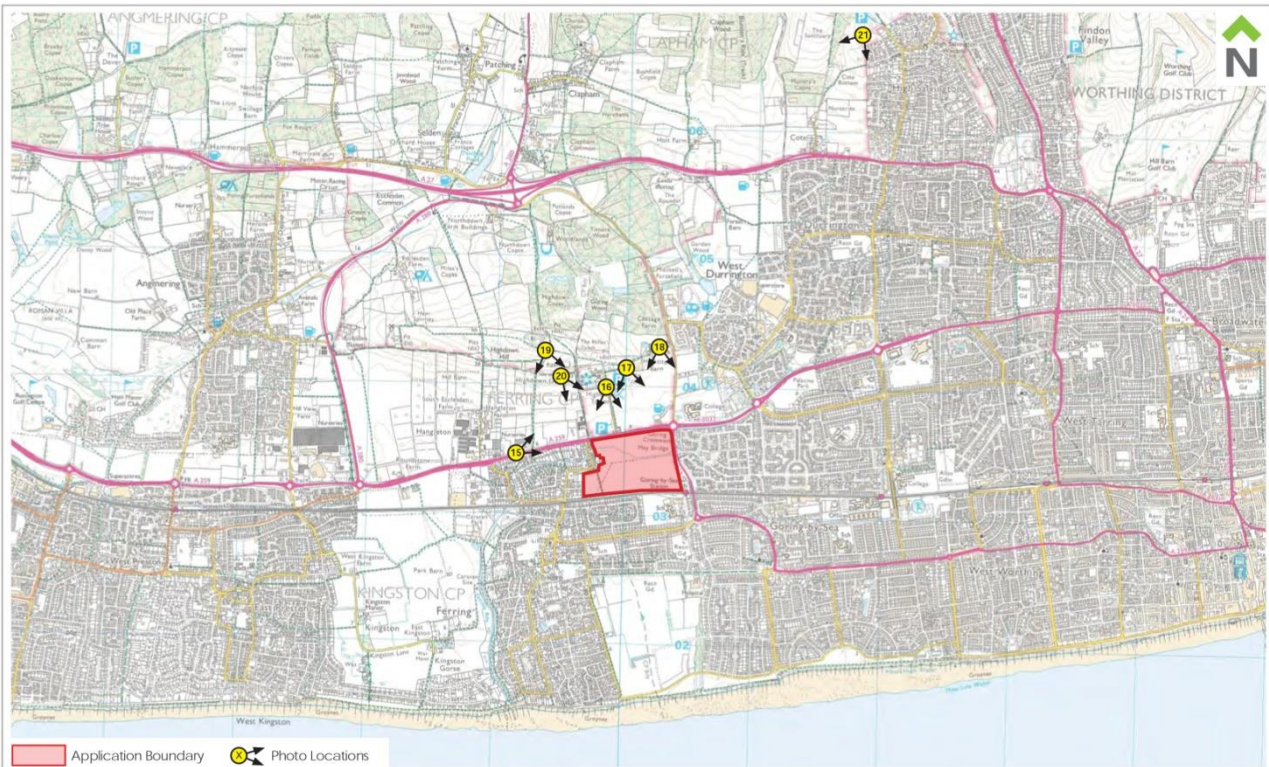
In the same way Persimmon’s landscape consultants’ careful appraisal of the site should have equal standing with the Council’s surveyor; yet only the latter’s comments are reported in the Plan. Because of that failure to report, we are left in the draft, with the damning text (2.70) that development of Chatsmore Farm would interfere with the transition of the Downs and the coastal plain. The Chatsmore Farm plans we have submitted provide a substantial swathe of green space along the A259 corridor, which fully reflects the transitional obligation. Our layout also embraces the wildlife importance of the river and makes positive response to para. 4.99 of the Draft Plan... *“across Worthing there is a deficiency in the amount of natural/ semi-natural amenity green space.”*

In plain terms, Chatsmore Farm is able to combine housing, recreation and open space. It is an important opportunity and we intend to provide a site dossier with this consultation submission to establish its credentials; **Persimmon Homes will not accept the Plan’s restrictive green space/ local gap designations.**

Below we show the site’s development configuration:



The visual/ countryside/ landscape merits of Chatsworth Farm are set out in the accompanying report by CSA Environmental. For the record, the consultants carefully appraised impact of development when viewed from the National Park, and the location of their long-view-appraisal is shown on the plan below:



<p>CSA environmental</p> <p>Dixes Bams, High Street, Ashwell, Hertfordshire SG7 5NT</p> <p>T 01452 743647 E ashwell@csaenvironmental.co.uk W csaenvironmental.co.uk</p>	Project	Chatsmore Farm, Goring-by-Sea	Date	May 2018	Drawing No.	CSA/2304/106
	Drawing Title	Site Location Plan	Scale @ A4	NTS	Rev	-
	Client	Persimmon Homes	Drawn	JB	Checked	CA
	© CSA Landscapes Ltd. Do not scale from this drawing. Refer to figured dimensions only.					

*** Please see full details in CSA's report.**



Chatsmore Farm, Goring-by-Sea

Review of Policies SP5: Local Green Gaps and SP6: Local Green Space – Draft Worthing Local Plan

Prepared by
CSA Environmental

on behalf of
Persimmon Homes
Thames Valley

Report No: CSA/2304/06

December 2018

Report Reference	Revision	Date	Prepared by	Approved by	Comments
CSA/2304/06	-	10.12.2018	CA	SG	First Issue



CONTENTS	Page
1.0 Introduction	1
2.0 Landscape Policy Framework	2
3.0 Review of Policies SP5 and SP6	6
6.0 Conclusion	12

Appendices

Appendix A: Site Location Plan

Appendix B: Development Framework Plan

1.0 INTRODUCTION

- 1.1 CSA Environmental has been instructed by Persimmon Homes Thames Valley to undertake a review of draft policies SP5: Local Green Gaps and SP6: Local Green Spaces, of the Draft Worthing Borough Local Plan.
- 1.2 Persimmon Homes Thames Valley are promoting the land at Chatsmore Farm, Goring-by-Sea (the 'Site'), as a potential housing allocation. The Site occupies an area of land between the neighbouring urban areas of Ferring and Goring-by-Sea. The majority of the Site lies within the administrative area of Worthing Borough Council, with a small rectangular parcel to the south west, within the adjoining authority of Arun District. The location of the Site is shown on the Site Location Plan in **Appendix A**.
- 1.3 The Draft Worthing Borough Local Plan identifies that the land at Chatsmore Farm is located in an area identified as a Local Green Gap. The purpose of the gap designation is to prevent coalescence between Worthing and Ferring. In addition, draft policy SP6 sets out the Council's intention to designate this land as a Local Green Space. The Local Green Space designation is described in the National Planning Policy Framework ('NPPF') and enables local communities to identify and protect green spaces which are of particular importance to them. The level of protection afforded to areas identified as Local Green Spaces is equivalent to that afforded by Green Belt.
- 1.4 This review considers the purpose of the draft Local Green Gap and Local Green Space policies and the degree to which it is appropriate to designate the land at Chatsmore Farm. It considers local and National planning policy / guidance and the Council's evidence base which underpin these designations. In addition, this document considers the role the Site plays in providing separation between Goring and Ferring, and to what extent it is demonstrably special to the local community.
- 1.5 CSA Environmental has been involved in the promotion of the Site at Chatsmore Farm since 2014 and has visited the Site on several occasions. CSA has provided landscape and visual advice which has informed representations to Worthing Borough Council. CSA's involvement has also informed the preparation of a Development Framework Plan which shows how development can be delivered. A copy of this plan is contained in **Appendix B**. A separate Landscape and Visual Overview has been prepared which also forms part of these representations.

2.0 PLANNING POLICY FRAMEWORK

National Policy and Guidance

- 2.1 There are no policies within the National Planning Policy Framework ('NPPF') which advocate the designation of Local Green Gaps. In addition, there is no mention of Local Green Gaps in the Planning Practice Guidance which accompanies the NPPF.
- 2.2 The Local Green Space designation was first identified in the NPPF (NPPF, 2012). Paragraph 99 of the updated NPPF (2018) states:
- 'The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.'
- 2.3 Paragraph 100 sets out the criteria which must exist in order for a Local Green Space designation to be used. These are:
- a) *'in reasonably close proximity to the community it serves;*
 - b) *demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
 - c) *local in character and is not an extensive tract of land.'*
- 2.4 Paragraph 101 states that policies for managing development in Local Green Space should be consistent with those in Green Belt.
- 2.5 Further guidance on Local Green Space is provided in the Planning Practice Guidance. The guidance on 'Open space, sports and recreation facilities, public rights of way and local green space' states that the Local Green Space designation is a way to provide special protection against development for green areas of particular importance to local communities (Paragraph: 005 Reference IS: 37-005-20140306).
- 2.6 In addition the guidance states how the Local Green Space designation relates to development:

'Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way' that undermines this aim of plan making.' (Paragraph:007 Reference IS: 37-007-20140306)

- 2.7 In respect of the types of green areas which can be identified as Local Green Space the guidance states the following:

'The green area will need to meet the criteria set out in paragraph 77 (NB. now paragraph 100 of NPPF 2018) of the National Planning Policy Framework. Whether to designate land is a matter for local discretion. For example, green areas could include land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis.' (Paragraph: 013 Reference ID: 37-013-20140306)

- 2.8 In terms of proximity of Local Green Space to the community it serves, the guidance notes that this will depend on local circumstances but must be reasonably close.

- 2.9 The PPG also provides advice on the size of Local Green Space:

'There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgment will inevitably be needed. However, paragraph 77 (NB. Paragraph 100 in NPPF 2018) of the National Planning Policy Framework is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. Consequently blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name.' (Paragraph: 015 Reference ID: 37-015-20140306)

- 2.10 Paragraph: 016 (Reference ID: 37-016-20140306) notes that there is no minimum size limit.

- 2.11 In terms of public access, the guidance states that although some areas to be considered for designation as Local Green Space may have unrestricted public access, areas with no public access could be considered, for instance if they are valued for their wildlife, historic significance and / or beauty (Paragraph 017 Reference ID: 37-017-20140306).

Local Policy

- 2.12 Current planning policy is set out in the adopted Local Development Plan. Since publication of the Worthing Core Strategy (2011) the adopted development plan does not include any specific policies relating to gaps between settlements, or Local Green Space.
- 2.13 Worthing Borough Council has published the Draft Worthing Borough Local Plan (2018). The following emerging policies are relevant to this report.
- 2.14 **Draft Policy SP5: Local Green Gaps** identifies the land at Chatsmore Farm as lying within this designation. The policy states that these areas have been designated in order to retain the separate identities and character of the neighbouring settlements. The policy goes on to state that any development permitted within these areas must not, either individually, or cumulatively, result in the coalescence of these settlements.
- 2.15 **Draft Policy SP6: Local Green Space** identifies the land at Chatsmore Farm as a Local Green Space. The policy provides the following justification for the designation:
- d) *'Chatsmore Farm is designated as Local Green Space because the community value: its setting to the historic environment and the South Downs National Park; important views that contribute strongly to a sense of place; wildlife, especially along the Ferring Rife; and the offer of escape from the urban environment for relaxation and exercise.*
- e) *Increased quiet and informal recreation would be compatible with this designation. Whilst some formal recreation space could be considered it would be important that it did not conflict with the qualities for which Chatsmore Farm is valued.'*

Evidence Base Documents

Landscape and Ecology Studies

- 2.16 Worthing Borough Council commissioned Hankinson Duckett Associates ('HDA') to undertake a landscape and ecology study to inform policy and potential development options in the emerging Local Plan. HDA prepared the following reports:
- Landscape and Ecology Study of Greenfield Sites in Worthing Borough, November 2015; and
 - Landscape and Ecology Study of Greenfield Sites in Worthing Borough – Review of Low Suitability Sites, March 2017;

- 2.17 The HDA document identified the Site as Site 5: Chatsmore Farm. The original study divides the Site into two zones: Zone B occupies the south west corner of the Site within Worthing Borough and Zone A comprises the remainder of the Site. By following the methodology set out in Section 2 of the study, it considers that Zone A has a substantial landscape, visual and ecological sensitivity to development, and is of substantial landscape, visual and ecological value. By combining these judgements it concludes the Zone A has a negligible / low suitability for development. In respect of Zone B it considers this area to have a moderate sensitivity and substantial value and therefore to have low suitability for development.

Goring Gap Proposed Local Green Space Designations (June, 2018)

- 2.18 HDA on behalf of the Council, have also undertaken an appraisal of the landscape suitability of the Goring Gap sites for designation as Local Green Space. The appraisal considers the suitability for designation against a number of criteria, as follows:

- Proximity to the community;
- Special qualities and local significance;
- Demonstrably special qualities to local communities;
- Local significance: beauty;
- Local significance: historic significance;
- Local significance: recreational value;
- Local significance: richness in wildlife value; and
- Local in character and not an extensive tract of land.

- 2.19 The appraisal concludes that Chatsmore Farm meets all the NPPF criteria for Local Green Spaces. In respect of the Goring Gap as a whole (which includes both Chatsmore Farm and the Goring-Ferring Gap) the appraisal states the following in respect of their performance against the NPPF criteria:

'Firstly, both parts of the Gap are adjacent to the community they serve. Secondly, they are demonstrably special to the local community and hold particular local significance for not just one, but all, of the examples provided in the NPPF criteria. Lastly, both sites which form the Gap are well-defined parcels of land and are not extensive tracts or simply blankets of unremarkable open countryside.'

- 2.20 The findings of the appraisal are considered further in the next section.

3.0 REVIEW OF POLICIES SP5 AND SP6

3.1 The following section considers the emerging Local Green Gap and Local Green Space designations in respect of the land at Chatsmore Farm, which is being promoted as a potential housing allocation. A Development Framework Plan has been prepared to support these representations (**Appendix B**). This demonstrates how development at the Site can be provided in a manner which respects the adjoining settlement pattern, the setting of the South Downs National Park, and retains a break in development along the route of Littlehampton Road.

3.2 The Draft Worthing Borough Local Plan seeks to provide a strategy for development and change in Worthing in the period up to 2033. Its purpose is to establish a spatial strategy and identify suitable locations for sustainable growth within the Borough. The Local Plan acknowledges that growth in the Borough is very constrained, and at paragraph 1.30 of the emerging plan states:

'Limited land availability, infrastructure constraints, areas of flood risk, heritage assets and high quality landscapes around the borough means that there is little room for expansion. Put simply, it is the same features we want to protect which, in part, constrain the borough's ability to grow and develop. The overarching challenge is therefore to balance development and regeneration against the limited physical capacity of Worthing to accommodate it and the need to maintain a good quality of life for new and existing residents.'

3.3 To compound matters, the Draft Worthing Borough Local Plan acknowledges that an increasing population and the special qualities of the area create a high demand for housing. In particular it identifies a shortage of affordable homes for younger people and people on low incomes.

3.4 The Council confirm that the most up-to-date assessment of the objectively assessed housing need (based on the standard method as set out in national planning guidance and the 2016 household projections published in September 2018) is 12,801 dwellings over the plan period (to 2033). This equates to 753 dwellings per annum across the plan period.

3.5 Despite the identified need for housing in the Borough, the Draft Local Plan has only identified an overall development capacity of 4,182 dwellings which can be delivered within the plan period. This represents a shortfall of 8,619 dwellings and equates to an annual housing target of 246 dwellings. The Council acknowledge that only 33% of the overall housing need will be met.

- 3.6 The Council's spatial strategy is therefore grossly inadequate and results in a significant shortfall in the required level of housing to meet the Borough's needs. Draft policies SP5 and SP6 form a key component of the Council's proposed spatial strategy and our findings are that they represent an unreasonable barrier to sustainable growth and the supply of much needed housing.

Draft Policy: SP5 Local Green Gap

- 3.7 The purpose of the Local Green Gap, as set out in draft Policy: SP5, is to maintain the separate identity and character of the settlements at Worthing and Ferring. The policy states that any development within the Gap must not individually or cumulatively lead to coalescence between the settlements. This policy is therefore a spatial planning tool designed to maintain the separate identity of adjoining settlements. It is not therefore concerned with landscape character or ecological value, which are entirely separate considerations.
- 3.8 In terms of spatial separation, the settlements at Goring-by-Sea and Ferring have visibly coalesced along the route of the railway line, immediately to the south of the Site. As acknowledged in the Landscape and Ecology Study of Greenfield Sites in Worthing, 1950's development alongside Goring Way has established a substantial link between the adjoining urban areas. The Site therefore does not prevent coalescence, as this has already occurred.
- 3.9 The Site therefore functions as an area of open land which provides a noticeable 'break' in the urban development which extends alongside the coast. This break is perceptible from Littlehampton Road alongside the northern boundary; from the adjoining roads and properties which border the Site; the railway line; and in certain views from the edge of the South Downs to the north, including Highdown Hill.
- 3.10 Development at the Site will inevitably extend into the open land which separates the northern extents of the existing settlements. Despite this, and in light of the current significant shortfall in housing within the Borough, some development in this area could be accommodated without impacting on the existing function of the Site, namely to provide a break in urban development. The Development Framework Plan shows how this can be achieved:
- Development would be located in the southern part of the Site and the northern field would remain open;
 - Development will reduce the quantum of open land between the settlements, but it will not cause coalescence as this has already occurred;

- In views from Littlehampton Road and the National Park a significant break in urban development would remain and would provide the foreground to views of the urban area;
- New public open space along the route of Ferring Rife and new publicly accessible footpaths will open this area up for recreational use;
- The proposals would result in a considered settlement edge which provides a more appropriate interface with the adjoining open space and farmland than the existing unsympathetic railway line; and
- New landscaping at the perimeter of the retained farmland / open space, including new hedgerow and tree planting, would assist in integrating and maintaining the visual link / connection with the farmland to the north of Littlehampton Road, while creating a recognisable edge to the built form;

Draft Policy: SP6 Local Green Spaces

- 3.11 The Council proposes to designate the land at Chatsmore Farm as a Local Green Space. This is a significant designation and conveys on the land the highest level of protection akin to Green Belt, thus effectively precluding any development unless very special circumstances exist to justify it. Like Green Belt, Local Green Space boundaries can only be designated when a plan is prepared or updated, and should be capable of enduring beyond the plan period. Such a designation therefore carries significant weight.
- 3.12 The NPPF sets out the strict criteria which must be met in order to justify designation of land as Local Green Space. This is supported by the PPG which provides further guidance.
- 3.13 The NPPF is explicit that designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. The is supported by the PPG which states:
- ‘Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making.’*
- 3.14 Worthing acknowledges that the draft Local Plan delivers a significant shortfall in the identified housing needs. The spatial strategy is therefore fundamentally flawed, and the Council should not be considering making

Local Green Space designations until such time as the Local Plan is able to identify sufficient housing numbers. The Local Green Space policy is a restrictive designation akin to Green Belt and would preclude development in these locations, thus posing a significant constraint to sustainable housing provision in the Borough.

- 3.15 Paragraph 100 of the NPPF identifies the criteria which Local Green Spaces should be assessed against. These criteria are considered in more detail below under the relevant heading. Where applicable reference is made to the Council's own evidence base.

Reasonably Close Proximity to the Community it Serves

- 3.16 There is no specific standard for what constitutes reasonably close, however it would be reasonable to conclude that Local Green Spaces should have good access by foot from the local area they serve. In this case, the Site is located in close proximity to the adjoining residential area. It is not however publically accessible, save for the public footpaths which extend alongside the railway to the south of this area, and cross the south west corner of the Site. The Council's Local Green Space appraisal of the Goring Gap, notes that the land at Chatsmore Farm is well used for recreation. There are a number of informal walking routes which cross this land, however there is no formal right for public access to the land, save along the public footpaths. The Council also notes that the Site attracts visitors from further afield, however this is clearly irrelevant, as these visitors are not part of the local community and their purpose is unlikely to be to visit the Site.

Local in Character and a not an Extensive Tract of Land

- 3.17 The NPPF does not indicate what constitutes an extensive tract of land, however the PPG states the Local Green Space designation should not be used to provide a blanket designation of countryside adjacent to settlements, and should not be used to achieve a new area of Green Belt by another name.
- 3.18 The Site is approximately 30ha in size which clearly constitutes an extensive tract of land. It comprises open, arable farmland adjacent to existing development. In terms of character it cannot be reasonably be described as local in character, given that it is farmland with limited public access and of no particular landscape quality. It is adjoined by housing, but does not relate to the local community, like for instance a village green would do. As set out in the PPG, it is not the function of the Local Green Space designation to provide a blanket designation across a large area of open land, and therefore, this criteria does not apply to the Site.
- 3.19 The Site's key function is to provide a visual 'break' between the adjoining settlements of Ferring and Goring-on-Sea. As noted above, this can be

achieved whilst permitting some development in the southern part of this area. The Local Green Space designation would be tantamount to creating a new area of Green Belt in order to maintain this area permanently open, and as noted in the PPG, this is not the purpose of the policy.

Demonstrably Special to the Local Community

- 3.20 The NPPF states that in order to qualify as Local Green Space, an area must be demonstrably special to the local community and hold a particular local significance. It cites a number of examples of significance, which are beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of wildlife. These factors are considered in more detail below.
- 3.21 In terms of scenic beauty, the Site has no local or national designation for landscape quality. It lies close to, but outside of the South Downs National Park. In terms of landscape quality, it is open farmland devoid of landscape features of note, save the drainage channel Ferring Rife, and it is bordered by housing. It cannot reasonably be described as being of high landscape quality or being scenically beautiful.
- 3.22 The Council's appraisal notes that the Site is visible from vantage points in the South Downs National Park, albeit within the context of the surrounding urban area. Despite this, visibility does not convey on the Site additional scenic qualities. Similarly, the appraisal notes views back to the National Park. Again, this does not raise the landscape quality of the Site. We would however note that these views could be locally valued, and are capable of retention if development did come forward on the Site.
- 3.23 In terms of the Site's historic significance, the Site contains no listed heritage assets. The Council's appraisal states that the Site is associated with Highdown Hill and Highdown Gardens. This assumption is based on the assessment undertaken by the Goring Residents Association. Whilst this assessment identifies the presence of these historic assets and describes their attributes, it makes no objective assessment of the role that the Site plays in their setting. It is therefore not a robust basis to make any judgement in respect of the Site's historic significance.
- 3.24 There is some inter-visibility between Site and these historic assets. In views from these assets, the Site occupies the foreground of urban development which extends along the coast. Retaining the northern part of the Site open can respect the existing views from these assets, whilst improved recreational access to the Site can permit additional views to the heritage assets and the South Downs National Park.
- 3.25 The Site is in private ownership and is not publically accessible, save for the public footpath which follows the railway line to the south, and a section of

public footpath which crosses the south west corner. Whilst there is evidence of dog walkers using the Site, there is no formal right of access. As such, the Site is of limited recreational value. The Council's appraisal notes that the recreational value of the Site is particularly important given the deficit of natural / semi-natural green space and amenity space in the Borough. This is misleading, the Site has limited access and makes no contribution to the Boroughs open space in its current form. The proposed development can however provide significant areas of public open space and recreational footpaths.

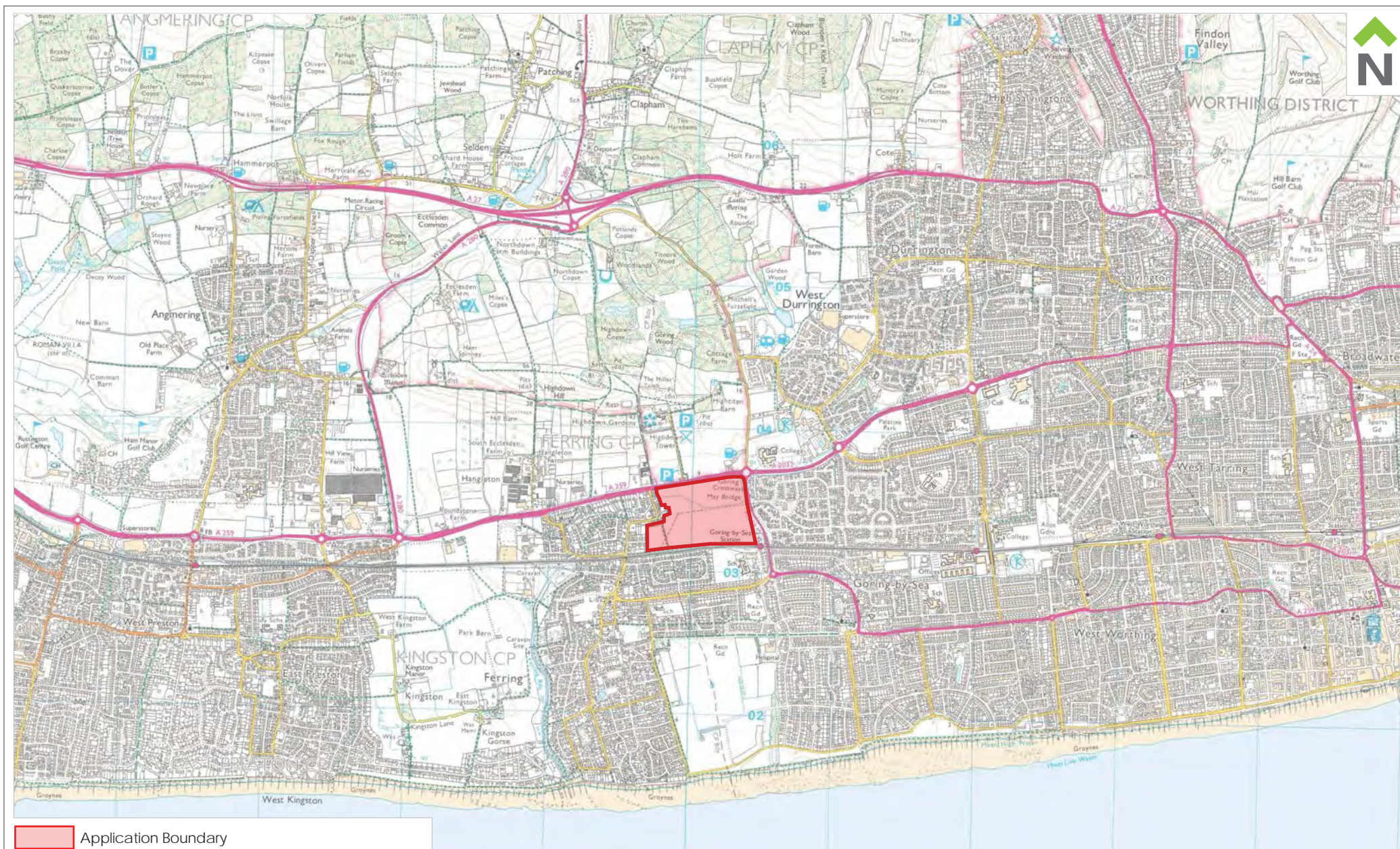
- 3.26 In terms of tranquillity, the Site is bordered by housing, roads and a railway line. In no reasonable assessment can it be considered to be particularly tranquil. The Council's appraisal notes that this area has moderate tranquillity, however does not appear to base this on any objective study or fact.
- 3.27 The Site comprises predominantly arable farmland which is of limited wildlife value, although it is acknowledged that Ferring Rife has more intrinsic wildlife interest. The Landscape and Ecology Study undertaken by HDA confirms, under ecological sensitivity, that the majority of the Site is of negligible conservation interest. The Council's Local Green Space appraisal, also undertaken by HDA, states that the significance of the Site's wildlife richness to the local community is highlighted by the 113 responses to the issues and options consultation. Whilst this may identify that some local people identify that the Site has wildlife value, it is not a robust or objective justification to suggest that it performs this function to any notable degree that it should be designated as Local Green Space.
- 3.28 Our assessment of the Local Green Space designation in respect of Chatsmore Farm has identified that it fails to meet the vast majority of the qualifying criteria set out in the NPPF. Given the significance of this designation and its restrictive nature, akin to Green Belt, we strongly contend that there is no justification for designating this Site as Local Green Space.

4.0 CONCLUSION

- 4.1 The Draft Worthing Local Plan has identified an overall development capacity within the Borough of 4,182 new homes during the plan period. This represents a shortfall of 66% based on the objectively assessed housing need of 12,801. The Council's spatial strategy is therefore grossly inadequate and results in a significant shortfall in the required level of housing to meet the Borough's needs. Draft policies SP5 and SP6 form a key component of the Council's proposed spatial strategy, and are an unreasonable barrier to sustainable growth and the supply of much needed housing.
- 4.2 Draft Policy SP5: Local Green Gaps seeks to prevent coalescence between adjoining settlements. In the case of Goreing-on-Sea and Ferring, this has already occurred to the immediate south of Chatsmore Farm. The Site instead functions as an area of open land which provides a noticeable 'break' in the urban development which extends alongside the coast. Development at the Site will inevitably extend into this open land, however development within the south of this area could be accommodated without impacting on the existing function of the Site, namely to provide a break in urban development.
- 4.3 CSA has assessed the Site against the criteria for designation as a Local Green Space, as set out in the NPPF. Our assessment found that designation would be wholly inappropriate and unsubstantiated, given that the Site is an extensive tract of farmland and does not have qualities which are demonstrably special and of particular local significance.

Appendix A

Site Location Plan



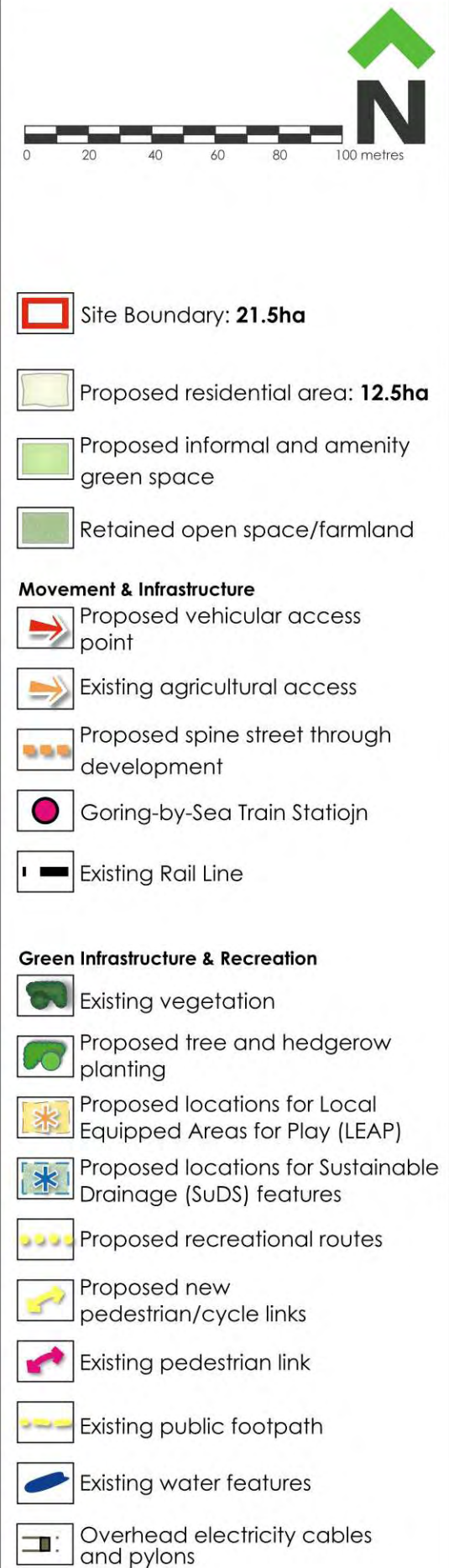
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Project Chatsmore Farm, Goring-by-Sea
Drawing Title Site Location Plan
Client Persimmon Homes Thames Valley

Date December 2018
Drawing No. CSA/2304/111
Scale @ A4 NTS
Rev -
Drawn SRW
Checked CA

Appendix B

Development Framework Plan



Rev	Date	By	Description
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Project	Goring Station, Goring		
Title	Development Framework Plan		
Client	Persimmon Homes Thames Valley		
Scale	1:2000 @ A2	Drawn	AgB
Date	December 2018	Checked	RR
Drawing No.	CSA/2304/110	Rev	-



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Chatsmore Farm, Goring-by-Sea

Landscape and Visual Overview

Prepared by
CSA Environmental

on behalf of
Persimmon Homes
Thames Valley

Report No: CSA/2304/07

December 2018

Report Reference	Revision	Date	Prepared by	Approved by	Comments
CSA/2304/07	-	10.12.18	CA	SG	First Issue



CONTENTS	Page
1.0 Introduction	1
2.0 Landscape Policy Context	3
3.0 Site Context	8
4.0 Site Description and Visibility	12
5.0 Suitability of the Site to Accommodate Development	16
6.0 Review of the Landscape and Ecology Study of Greenfield Sites in Worthing Borough	21
6.0 Conclusion	24

Appendices

Appendix A: Site Location Plan

Appendix B: Aerial Photograph

Appendix C: Photosheets

Appendix D: MAGIC Map and Heritage Information

Appendix E: Extract from Landscape and Ecology Study of Greenfield Sites in Worthing Borough, November 2015

Appendix F: Extract from Landscape and Ecology Study of Greenfield Sites in Worthing Borough – Review of Low Suitability Sites, March 2017

Appendix G: Development Framework Plan

Appendix H: Methodology

1.0 INTRODUCTION

- 1.1 CSA Environmental has been instructed by Persimmon Homes Thames Valley to undertake a landscape and visual overview of land at Chatsmore Farm, Goring-by-Sea. The Site is being promoted for development through the emerging Worthing Borough Local Plan. The location and extent of the Site is shown on the Location Plan at **Appendix A** and on the Aerial Photograph at **Appendix B**.
- 1.2 The Site is not identified as a development allocation in the Draft Worthing Borough Local Plan. Draft policies SP5 and SP6 identify the land at Chatsmore Farm as a Local Green Gap and a Local Green Space. Separate representations have been prepared by CSA in respect of these emerging policies and this document focuses on the suitability of the Site to accommodate development from a landscape and visual perspective.
- 1.3 The emerging Local Plan acknowledges that growth in the Borough is very constrained and that the Council has only identified an overall development capacity of 4,182 dwellings which can be delivered within the plan period. This represents a shortfall of 8,619 dwellings based on the Council's own objectively assessed housing need. The Council admits that only 33% of the overall housing need will be met. The Council's spatial strategy is therefore grossly inadequate and results in a significant shortfall in the required level of housing to meet the Borough's needs. Persimmon Homes Thames Valley is submitting representations in support of housing at Chatsmore Farm, which can provide additional homes to help redress the current shortfall.
- 1.4 The Site occupies a rectangular land parcel which forms an indentation in the built form between the adjoining settlements of Ferring and Worthing. A short distance to the north, beyond Littlehampton Road is the start of the South Downs National Park ('SDNP'). The majority of the land under the control of Persimmon Homes Thames Valley is within Worthing Borough, however the small rectangular field to the south west lies within Arun District. For completeness this overview considers the entire land holding.
- 1.5 This overview describes the existing landscape character and quality of the Site and its visual characteristics. It considers published landscape guidance and relevant landscape studies which have informed the Council's Evidence Base for the new Local Plan. The report describes how development can be accommodated at the Site and any potential landscape or visual impacts on the wider area. In addition, it considers the impact of development on the separation between Ferring and Worthing and the findings of the Landscape and Ecology Study undertaken by the Council.

Methodology

- 1.6 To inform this assessment the Site has been visited by suitably qualified and experienced Landscape Architects in April 2015 and most recently in April and November 2018. At the time of the visits visibility was good.
- 1.7 In landscape and visual impact assessments, a distinction is drawn between landscape effects (i.e. effects on the character or quality of the landscape irrespective of whether there are any views of the landscape, or viewers to see them) and visual effects (i.e. effects on people's views of the landscape from public vantage points, including public rights of way and other areas with general public access, as well as effects from any residential properties). This report therefore considers the potential impact of the development on both landscape character and visibility. The methodology utilised in this report is contained in **Appendix H**.
- 1.8 Photographs contained within this document (**Appendix C**) were taken using a digital camera with a lens focal length approximating to 50mm, to give a similar depth of vision to the human eye. In some instances images have been combined to create a panorama.

2.0 LANDSCAPE POLICY CONTEXT

- 2.1 National policy is set out in the Revised National Planning Policy Framework ('NPPF') and those parts relevant to this assessment are summarised below.
- 2.2 Paragraph 10 and 11 of the NPPF states that at the heart of the Framework is a presumption in favour of sustainable development, which should be applied in relation to both plan-making and decision-taking.
- 2.3 Paragraph 20 of the NPPF states that strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for, among other elements, the *'(d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.'*
- 2.4 Paragraph 99 relates to the designation of Local Green Space and states:
- 'The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.'*
- 2.5 Paragraph 100 sets out the criteria which must exist in order for a Local Green Space designation to be used. These are:
- a) 'in reasonably close proximity to the community it serves;*
 - b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
 - c) local in character and is not an extensive tract of land.'*
- 2.6 Paragraph 101 states that policies for managing development in Local Green Space should be consistent with those in Green Belt.
- 2.7 Section 12 of the NPPF sets out that planning policies and decisions should support the creation of high quality buildings and places. Paragraph 125 states that *'... design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics.'*

2.8 Paragraph 127 states that planning policies and decisions, should ensure that developments, amongst others:

- *'will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- *are visually attractive as a result of good architecture, layout and effective landscaping;*
- *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change...'*

2.9 Section 15 of the NPPF deals with conserving and enhancing the natural environment. Paragraph 170 of the document states that the planning system should contribute to the protection and enhancement of the natural and local environment through, among other things, protecting and enhancing valued landscapes, *'... (in a manner commensurate with their statutory status or identified quality in the development plan)'*. The paragraph also outlines that the planning system should recognise the, *'...intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.'*

2.10 Paragraph 172 notes that great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.

Local Policy Context

2.11 The Site is being promoted for development through the emerging Worthing Borough Local Plan. Worthing Borough Council has published the Draft Worthing Borough Local Plan (2018).

Draft Worthing Borough Local Plan (2018)

2.12 The emerging Local Plan seeks to provide a strategy for development and change in Worthing in the period up to 2033. Its purpose is to establish a spatial strategy and identify suitable locations for sustainable growth within the Borough. The Local Plan acknowledges that growth in the Borough is very constrained and the Council has only identified an overall development capacity of 4,182 dwellings which can be delivered within the plan period. This represents a shortfall of 8,619 dwellings based on the Council's own objectively assessed housing need. The Council acknowledge that only 33% of the overall housing need will be met.

- 2.13 The following emerging policies are also relevant to this report.
- 2.14 **Draft Policy SP5: Local Green Gaps** identifies the land at Chatsmore Farm as lying within this designation. The policy states that these areas have been designated in order to retain the separate identities and character of the neighbouring settlements. The policy goes on to state that any development permitted within these areas must not, either individually, or cumulatively, result in the coalescence of these settlements.

- 2.15 **Draft Policy SP6: Local Green Space** identifies the land at Chatsmore Farm as a Local Green Space. The policy provides the following justification for the designation:

'Chatsmore Farm is designated as Local Green Space because the community value: its setting to the historic environment and the South Downs National Park; important views that contribute strongly to a sense of place; wildlife, especially along the Ferring Rife; and the offer of escape from the urban environment for relaxation and exercise.'

'Increased quiet and informal recreation would be compatible with this designation. Whilst some formal recreation space could be considered it would be important that it did not conflict with the qualities for which Chatsmore Farm is valued.'

- 2.16 CSA Environmental has prepared separate representations on behalf of Persimmon Homes Thames Valley in respect of Policies SP5 and SP6 (Please refer to CSA/2304/06 Review of Policies SP5: Local Green Gaps and SP6: Local Green Space – Draft Worthing Local Plan). As a result, this information is not duplicated in this report, which instead focuses on the suitability of the Site in landscape and visual terms to accommodate development.

Worthing Core Strategy (2011)

- 2.17 Current planning policy is set out in the adopted Local Development Plan. Since publication of the Worthing Core Strategy (2011) the adopted development plan does not include any specific policies relating to gaps between settlements, or Local Green Space. The Following adopted policies are relevant to this assessment.
- 2.18 **Policy 13: The Natural Environment and Landscape Character** states that as part of the Worthing Development Strategy new development needs can be met within the existing built up area boundary. The Policy notes that residential development outside of the existing built up area boundary will only be considered as part of a borough-wide housing land review if there is a proven under-delivery of housing within the Core Strategy period. In general terms the Policy notes that all new development will respect biodiversity and

the natural environment that surrounds the development and will contribute to the protection and, where applicable, the enhancement of the area. The Worthing Core Strategy Proposals Map identifies the Site as lying within Land Outside of the Built Up Area Boundary.

- 2.19 **Policy 14 Green Infrastructure** states that Worthing's areas of green infrastructure will be improved and enhanced to maintain their quality and accessibility for residents and visitors. Where there is an under-provision of any green infrastructure typographies within the town, new infrastructure will be provided, where it is feasible and practical. Planning obligations from new development will be used to both enhance the current green infrastructure stock and contribute towards any new provision.
- 2.20 **Policy 16 Built Environment and Design** states that throughout the borough all new development will be expected to demonstrate good architectural and landscape design and use of materials that take account of local, physical, historical and environmental characteristics of the area.

Evidence Base

- 2.21 Worthing Borough Council commissioned Hankinson Duckett Associates ('HDA') to undertake a landscape and ecology study to inform policy and potential development options in the emerging Local Plan. HDA prepared the following reports:
- Landscape and Ecology Study of Greenfield Sites in Worthing Borough, November 2015; and
 - Landscape and Ecology Study of Greenfield Sites in Worthing Borough – Review of Low Suitability Sites, March 2017;
- 2.22 The purpose of this study was to review eight greenfield sites which were being promoted through Worthing's Strategic Housing Land Availability Assessment ('SHLAA') and to consider their suitability for development in landscape and ecological terms. Of the eight sites assessed, a number are considered unsuitable for any form of development whereas others are considered to have varying sensitivities, and as a consequence may be wholly or only partially suitable for development. The HDA document identified the Site as Site 5: Chatsmore Farm. Extracts from the relevant parts of these reports are contained in **Appendices E and F**.
- 2.23 The original study divides the Site into two zones: Zone B occupies the south west corner of the Site within Worthing Borough and Zone A comprises the remainder of the Site. By following the methodology set out in Section 2 of the study it considers that Zone A has a substantial landscape, visual and ecological sensitivity to development, and is of substantial landscape, visual

and ecological value. By combining these judgements it concludes the Zone A has a negligible / low suitability for development. In respect of Zone B it considers this area to have a moderate sensitivity and substantial value and therefore to have low suitability for development.

2.24 Section 6 of the report notes that Zones of major or substantial sensitivity and/or value have negligible to low suitability for development in terms of landscape/visibility/ecology. It states that development in these areas would have a significant and detrimental effect on the character of the landscape as a whole and/or on separation between settlements, the setting to existing settlement or the SDNP.

2.25 Following representations from site promoters, HDA undertook a further review of three sites judged to be of low suitability in the original study. The 2017 update to the Study considers in more detail the land in the south west corner of the Site (Zone 5B) and includes an assessment of the balance of the Site within Arun District, identified as Zone 5C. This assessment considers Zones 5B and 5C to have a moderate sensitivity and value and a moderate suitability to accommodate development. This change in judgement appears to have resulted largely from the inclusion of Area 5C which the report notes is surrounded by development and is less distinctive than the main open gap and makes less contribution to the setting of the National Park. This assessment concludes:

'Sites with a medium suitability are considered to have potential for limited development which should have regard for the setting of outstanding assets such as the National Park, and should take account of the form of existing settlement and the character and sensitivity of adjacent landscapes. In this instance, development within the site should be limited to the development area indicated on figure E, provided the green infrastructure proposals set out are incorporated.'

2.26 The findings of the Landscape and Ecology Study are considered in more detail in Section 6 of this report.

3.0 SITE CONTEXT

Site Context

- 3.1 The Site occupies a rectangular land parcel, comprising three arable fields which are indented into the urban area between the adjoining suburbs of Worthing and Ferring. The Site location and its immediate context are illustrated on the Location and Aerial Photograph in **Appendices A and B**, and on the photographs contained within **Appendix C**.
- 3.2 To the north, the Site is bounded by Littlehampton Road (A259); to the south by the coastal railway; to the east by Goring Street; and to the west by the properties served off Ferring Lane and Green Park. Beyond the A259, the land rises gradually on the lower slopes of Highdown Hill, which lies at the southern extent of the SDNP. Goring-by-Sea Railway Station lies adjacent to the south eastern corner of the Site.
- 3.3 To the east of the Site is flatted development, typically 3 storeys in height, extending along the route of Goring Street. Southwards, this is replaced by post-war, estate housing within the built up area of Worthing. To the south east, is the Church of Jesus Christ and the Latter Day Saints, beyond which is Goring-by-Sea Station. North east, at the junction of Goring Street and Littlehampton Road, are the buildings and grounds at Northbrook College beyond which is the urban area of Durrington.
- 3.4 The coastal railway line extends alongside the southern Site boundary, at level grade with the land in the southern part of the Site. Immediately beyond this, to the east, is recent flatted development and the playing fields at Chatsmore Catholic High School; with the post-war bungalows at Singleton Crescent located further west.
- 3.5 To the east of the Site is mixed development along Ferring Lane, comprising bungalows and houses of varied style and age, including the older listed dwellings at Clematis and Jasmine Cottages. Housing at Green Lane comprises Twentieth Century bungalows.
- 3.6 Immediately to the north of the Site, within the SDNP, is arable farmland with the well vegetated grounds at Highdown Garden, a Registered Park and Garden and Conservation Area, occupying the rising ground on Highdown Hill. Beyond this, the landform continues to rise to the summit of the hill, from which extensive views are available towards the coast, over the urban area of Worthing.
- 3.7 To the west of the Site, Littlehampton Road is characterised by the urban area of Ferring to the south; whilst to the north the landscape is influenced by the presence of commercial nurseries, a vineyard, pockets of commercial

development and by extensive areas of paddocks associated with Hangleton Farm Equestrian Centre. The strongly rectilinear field pattern, shelterbelts and heavily managed landscape lend this an urban fringe character, which contrasts strongly with the rolling countryside of the South Downs a short distance further north.

National Landscape Character

- 3.8 Natural England has produced profiles for England's National Character Areas (NCA's), which divides England into 159 distinct natural areas, defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. The South Coast Plain (Area 126) extends from Brighton in the east to Southampton in the west and occupies the tranche of land between the chalk dip slope of the South Downs and the English Channel.
- 3.9 The NCA comprises a narrow strip running along the Hampshire and Sussex coast and the profile notes that there are long views available towards the sea and the Isle of Wight. The NCA slopes southward towards the coast with the rivers Arun, Adur, Meon and Hamble draining south from the South Downs and South Hampshire Lowlands NCA's. There is significant urban development along the coast, including along trunk roads, suburban villages and an extensive string of seaside towns including Worthing. There are stretches of farmland between the developed areas, often defined as large arable fields with low hedges and ditches.

County Landscape Character

- 3.10 Chris Blandford Associates has undertaken a Landscape Character Assessment of the District on behalf of West Sussex County Council. The Site falls within the South Coast Plain Regional Character Area (RCA). This region is subdivided into 12 smaller Landscape Character Areas (LCA's'). The Application Site lies within the 'SC11 Littlehampton and Worthing Fringes' LCA. The Key characteristics of the LCA that are relevant to the Site include:
- Low lying flat open landscape;
 - Dominant urban fringe with major conurbations of Littlehampton and Worthing. Settlement edges often sharply contrast with adjacent open countryside;
 - Frequent urban fringe influences of horse paddocks, light industry, airport, and recreational open space;
 - Narrow gaps of open land at Kingston, Ferring, Sompting, and Lancing provide views to the sea and separation between the urban areas;

- Medium scale arable farming and market gardening, with clusters of greenhouses;
- Meandering Rifes and straight drainage ditches;
- A low density of native hedgerows and hedgerow trees, interspersed with shelterbelts, single species hedges or individual standards planted using tall trees such as Poplar, Monterey Pine and Tulip trees;
- Clusters of windblown trees;
- Long views to the South Downs;
- Busy minor and major roads;
- Industry in the countryside; and
- South Coast railway line links the areas.

3.11 The document also identifies key landscape and visual sensitivities which affect the LCA, as follows:

- Urban development pressures, especially in the gaps between settlements;
- Closing of open views between settlements;
- Major existing road improvements and the possibility of new ones;
- Loss of tree and hedgerow cover due to wind, salt desiccation and drought, and;
- Planting of hedge and tree boundaries with unsympathetic exotic species.

Statutory and Non-Statutory Designations

3.12 The Multi Agency Geographic Information for the Countryside Map ('MAGIC') indicates that the Site is not covered by any statutory or non-statutory designations for landscape character or quality (please refer to MAGIC Map and Heritage Plan in **Appendix D**).

3.13 The boundary of the SDNP is contiguous with Littlehampton Road adjacent to the section which runs alongside the northern Site boundary. The higher ground at Highdown Hill, including the registered gardens at Highdown, lie within the National Park. Eastwards the boundary returns to the north to skirt around the built up edge of Durrington; whilst to the west the paddocks

associated with the Hangleton Farm Equestrian Centre lie outside of the National Park.

Conservation Area and Listed Buildings

- 3.14 There are no listed buildings within the Site, however there are a number of listed buildings located within its vicinity (refer to the plan in **Appendix D**). There are two listed buildings, including the main building and outbuildings, at North Barn, a short distance north of the A2032. Further north is the Grade II listed Hightiten Barn. The Grade II listed Clematis and Jasmine Cottages are located alongside the western Site boundary.
- 3.15 There are a number of other listed buildings within 1 km of the Site, however there is no inter-visibility between the Site and these heritage assets owing to intervening built development.
- 3.16 Highdown Conservation Area occupies the same footprint at the registered Park and Gardens a short distance to the north of the Site, beyond the A2032. There is also a Scheduled Monument, in the form of an Anglo-Saxon Cemetery and associated remains, located on the higher ground at Highdown Hill.

Public Rights of Way

- 3.17 A footpath leads from the Goring-by-Sea station and extends alongside the southern boundary to the adjoining settlement at Ferring. A second path extends north – south through the western part of the Site, leading from Ferring Lane to meet the footpath alongside the southern boundary. Further afield there are a number of footpaths which cross the higher ground around Highdown Hill at the edge of the South Downs

Tree Preservation Orders

- 3.18 There are no trees located within the Site, nor on the land immediately adjoining the Site, which are covered by Tree Preservation Orders ('TPO'). This was confirmed via email from the Council in May 2018.

4.0 SITE DESCRIPTION AND VISIBILITY

Site Description

- 4.1 The Site occupies three arable fields which are indented into the existing urban fabric at the edge of the built up suburbs of Goring-by-Sea and Ferring. The majority of the Site comprises two large fields which are separated by the route of Ferring Rife, a significant drainage channel which bisects the Site in an east – west direction. The balance of the Site is made up of a much smaller field in the south west corner. High voltage, overhead electricity cables and lattice pylons cross the Site following the route of Ferring Rife before dog legging southwards to cross the railway line. The Site and its immediate context are illustrated on the aerial photograph in **Appendix B** and on the photographs in **Appendix C**.
- 4.2 A public footpath extends along the length of the southern Site boundary leading between Goring Street and Ferring Lane. A second footpath follows the hedge line in the south western corner of the Site, connecting through to Ferring Lane, close to the listed buildings at Clematis and Jasmine Cottages. In addition, there are several informal walking routes that follow the course of Ferring Rife and the periphery of the Site.
- 4.3 Ferring Rife is a broad drainage channel, several metres deep with steeply sloping grass banks. A watercourse follows the base of the channel, punctuated by occasional pockets of marginal vegetation.
- 4.4 There are few landscape features of note contained within the body of the Site, save the rife and an intermittent field hedgerow which defines the boundary between the field in the south west corner and the remainder of the Site.
- 4.5 The northern Site boundary with Littlehampton Road is open to the adjoining highway. To the east the boundary with Goring Street is defined by post and rail fencing to the northern field, behind which is a patchy band of thicket. Further south, this boundary is defined by intermittent sections of ditch and patches of scrub.
- 4.6 The southern boundary with the railway line is demarcated by a chainlink fence and occasional thicket plants. To the west are the rear gardens of the dwellings at Green Park and Ferring Lane, which at the interface with the Site are defined by a combination of hedgerows, fence panels and garden trees.

Topography

- 4.7 The Site lies within the South Coast Plain NCA an area of low lying, flat topography. Immediately north of Littlehampton Road the land rises at the

start of the South Downs. The summit of Highdown Hill is approximately 1km north of the Site. It occupies an elevated position at approximately 81 metres Above Ordnance Datum ('AOD') with extensive views available across the adjoining plain to the south. Beyond this, the landscape of the Downs has a distinctly undulating, wooded character.

Visibility

- 4.8 An assessment of the visibility of the Site was undertaken and a series of photographs taken from public vantage points, rights of way and public highways. The viewpoints are illustrated on the Location Plan and Aerial Photograph contained in **Appendices A** and **B** and on the photographs in **Appendix C**.
- 4.9 The Site is relatively open and there are opportunities for near distance views from the adjoining highways and dwellings, however these are limited in scope owing to the density of urban development to the west, east and south of the Site. In addition, there are a number of views of the Site from public vantage points on the higher ground within the sensitive landscape of the SDNP.

Near Distance Views

- 4.10 There are near distance, open views from Littlehampton Road adjacent to the northern Site boundary (**Photograph 08**). In these views, the Site forms a broad expanse of undistinguished farmland, with the existing built up edge visible in the backdrop. There are two dwellings to the north of the road, which have similar views from upper storey windows. There are also views from the front of the Swallows Return Public House and from the footbridge leading to Northbrook College (**Photograph 14**). As the viewer transitions a short distance east and west of the Site along Littlehampton Road however, views are restricted by intervening development (**Photographs 07** and **15**).
- 4.11 There are relatively open views from Goring Street to the east of the Site, and from windows in the front and side elevations of the neighbouring predominately flatted development (**Photograph 12** and **13**).
- 4.12 There are views from the recently constructed flatted development to the south east of the Site (**Photograph 04**). Views from the adjoining single storey housing further west however are restricted by rear garden fencing and vegetation (**Photograph 10**). Passengers traveling on the railway line will experience open, albeit transitory views of the Site. There are also views from the footbridge at Goring-by-Sea Station (**Photograph 11**).
- 4.13 There are views from the rear of a number of dwellings at Ferring Lane, although these are restricted to varying degrees by rear garden vegetation

and fences. The listed dwellings at Clematis and Jasmine Cottage have generous, well vegetated rear gardens, and views from the rear of the dwellings are heavily filtered. Similarly, the bungalows at Green Park have views, although again these are restricted by hedging and fencing to the Site boundary (**Photograph 09**). Views from public vantage points to the west are limited to partial, glimpsed views between buildings, notably along the course of Ferring Rife where it enters the urban area of Ferring (**Photograph 06**).

Middle and Long Distance Views

- 4.14 There are views over the Site from the road leading to the public carpark adjacent to Highdown Gardens (**Photograph 16**). There are similar views available from public vantage points on Highdown Hill (**Photographs 17, 19 and 20**). In views towards the coast from these elevated vantage points, the broad expanse of coastal development within the built up area of Worthing is conspicuous, with the Site forming a rectangular indentation in the otherwise continuous belt of development within the coastal plain.
- 4.15 There are also partial views from the public footpath leading to the listed building at Hightiten Barn (**Photograph 18**).
- 4.16 In long distance views from the open space at West Hill, the Site can be discerned as a break in the urban area (**Photograph 21**).

Landscape Quality, Value and Sensitivity

- 4.17 The Site does not carry any statutory or non-statutory designations for landscape character or quality. It comprises, in the main, a couple of large scale arable fields, largely devoid of any significant landscape features with the exception of the large drainage channel, Ferring Rife. It is heavily influenced by the proximity of residential development, highway infrastructure, the railway line and by the large lattice pylons that extend across the Site.
- 4.18 The open character of the Site forms a conspicuous break in the existing urban fabric, however its contribution to the setting of the adjoining built up area in its current form is limited, owing to the separation afforded by the adjoining highways, railway line and by the unsatisfactory interface with the rear gardens of dwellings located in Ferring. Accordingly, it is only considered to be of **medium to low** landscape quality, however it has a **medium** sensitivity owing to the availability of views towards the Site from the higher ground within the SDNP a short distance to the north.
- 4.19 In terms of value, the Site appears to be used by pedestrians and dog walkers. Similarly, its predominately open character within a heavily urbanised area is likely to be valued by local residents. Accordingly, the Site is

considered to have a **medium** landscape value. It is not a 'valued' landscape in respect of paragraph 170 of the NPPF.

5.0 SUITABILITY OF THE SITE TO ACCOMMODATE DEVELOPMENT

5.1 The following section assesses the ability of the Site to accommodate development and potential impacts on the character of the landscape and visual amenity, or on the separation between Goring-by-Sea and Ferring. The key landscape and visual issues / effects are described in the relevant section below.

5.2 The Site is being promoted for residential development through the emerging plan. This overview has informed the preparation of a Development Framework Plan which shows how development can be delivered at the Site (**Appendix G**). The key landscape and visual principals which are shown on this plan are as follows:

- The proposed housing area to be located within the southern part of the Site, beyond Ferring Rife, with the majority of the built form set back to the south of the overhead powerlines, although some development could be accommodated in the south western corner of the Site (in Arun District);
- Ferring Rife to be retained within an area of landscaped open space;
- The field to the north of Ferring Rife to be retained free from development either as an area of recreational open space or to remain as farmland;
- Areas of open space to extend into built form, to break up the development parcels and to provide a varied building line and considered frontage to the open space to the north;
- New hedgerow and standard tree planting to be undertaken alongside the periphery of the Site;
- New landscaping alongside the residential edge with Ferring to provide a softer urban edge;
- New buffer planting alongside the railway corridor to the south;
- Existing public rights of way to be retained within areas of open space and new pedestrian / cycle connections created through areas of open space and alongside Ferring Rife; and
- Appropriate outward facing development which positively addresses areas of open space and adjoining highways.

5.3 In the following section a brief commentary is made on the effects of developing the Site against a series of landscape criteria.

Relationship to Settlement

- 5.4 The Site is closely related to the existing urban area, with residential development extending along three sides. To the west, the boundary is defined by the rear gardens of housing in Ferring; to the south the boundary is formed by the coastal railway line; whilst to the east, the urban edge of Goring-by-Sea is separated by the busy highway along Goring Street.
- 5.5 The Site does however provide a break in the built form of the surrounding urban area. Despite this, an appropriate development which occupies the southern part of the Site only would complement the urban character of the adjoining settlements. Although there would be a loss of arable farmland which currently contributes to the break in the existing built up area, development would retain a significant swathe of open space and maintain the open character in the northern part of the Site.

Landscape Features

- 5.6 There are no landscape features contained within the southern part of the Site which would pose a constraint to development in this location. Ferring Rife will be retained within a landscaped corridor and enhanced to the benefit of landscape character and local wildlife. The land to the north will be retained as farmland, or provided as recreational open space. In addition, there are significant opportunities for landscape enhancements at the boundaries of the Site and within areas of open space.

Public Rights of Way

- 5.7 The existing public footpaths can be retained along their current alignments, within areas of open space or landscape corridors. Similarly, the informal routes alongside Ferring Rife and field boundaries can be formalised within areas of public open space.

Visibility

- 5.8 The visual appraisal set out in Section 4 identifies that due to the relatively open nature of the Site there are opportunities for views from adjoining dwellings and public highways. Middle and long distance views from the south, east and west of the Site are prevented by intervening development, however there are opportunities for views from the rising ground within the SDNP to the north.
- 5.9 In views from Littlehampton Road development will be visible to the rear of the retained farmland / recreational open space. Although development will be more visible, it will lie in the foreground of existing development and the coastal railway line which currently form a rather blunt edge to existing views.

- 5.10 Similarly, the proposals will impact on views from a section of Goring Street to the east and from a number of dwellings at the western edge of Goring-by-Sea. Again, given the built up nature of the surrounding area, new development in this location will not appear incongruous in these views.
- 5.11 Views from the bungalows to the south of the Site are limited by boundary fencing. There will be more extensive views from the upper floors of the flats to the south east however these will be seen to the rear of the coastal railway line.
- 5.12 There will be views available to passengers travelling on the railway, however by their nature these will be transitory and brief and perceived in the context of the larger urban context through which the train has been passing.
- 5.13 There will be some views from the rear of a number of dwellings in Ferring however these will predominately be of open space and retained farmland.
- 5.14 The Site is visible in views from the higher ground at the edge of the National Park, predominately from vantage points on Highdown Hill. At present the Site forms an area of open farmland which indents the surrounding built up area and merges with the farmland on the lower slopes of Highdown Hill. Views from the National Park are highly sensitive, however in views south the Site occupies the low lying land alongside urban development which is a feature of the South Coast Plain. Whilst development in the southern part of the Site would inevitably increase the amount of visible development within the coastal plain it would not be introducing a new or uncharacteristic element to the view. In fact, urban development is a feature of views south from the edge of the National Park. The retention of the northern part of the Site open, combined with environmental improvements alongside the Ferring Rife corridor and the careful design and landscaping of the new urban edge, would limit the adverse visual effects on views from vantage points in the National Park.

Landscape Character and Quality

- 5.15 As discussed in the previous section, the Site does not carry any statutory or non-statutory designations for landscape character or quality. It is undistinguished in landscape terms and has few notable features save the large drainage ditch, Ferring Rife. It is influenced by its proximity to the existing urban area, the coastal railway line and by the lattice pylons which cross the Site. It does lie adjacent to the National Park, however clearly relates to urban development within the low lying coastal plain. It shares few of the characteristics associated with the rolling, wooded landscape of the Downs, although there is a subtle visual connection between the open farmland of the Site and the farmland on the lower slopes of Highdown Hill.

- 5.16 The proposals are located in the southern part of the Site only, retaining the open character of the northern land parcel adjacent to the National Park. Accordingly, development in the location shown would complement the existing settlement pattern, and could be provided in such a way that it integrates the urban area and the adjoining countryside in a sensitive and appropriate manner.

Local Green Space

- 5.17 Draft Policy SP6 identifies the land at Chatsmore Farm as Local Green Space. This is a significant designation and conveys on the land the highest level of protection akin to Green Belt, thus effectively precluding any development unless very special circumstances exist to justify it. CSA has prepared separate representations in respect of this policy.
- 5.18 These representations found that the Local Green Space designation, in respect of Chatsmore Farm, fails to meet the qualifying criteria set out in the NPPF. This designation would be wholly inappropriate and unsubstantiated, given that the Site is an extensive tract of farmland and does not have qualities which are demonstrably special and of particular local significance.

Separation between Goring-by-Sea and Ferring

- 5.19 The Site currently provides an area of undeveloped land indented into the urban area between the settlements at Ferring and Goring-by-Sea. Its key function, in townscape terms, is to provide a break in the built form along the route of Littlehampton Road. The relatively open character of the Site means that there are few physical or visual barriers to prevent views between the two settlements. The Draft Worthing Borough Local Plan identifies the land at Chatsmore Farm as a Local Green Gap (draft Policy SP6: Local Green Gaps). Separate representations have been prepared in respect of this policy and the following section considers the degree to which the proposed development would impact on the actual and perceived separation between Goring-by-Sea and Ferring.
- 5.20 Immediately to the south, development in Goring-by-Sea extends along the route of the railway line and Goring Way to merge seamlessly with Ferring, with these areas forming part of the wider urban area which extends along the Coastal Plain. Goring-by-Sea and Ferring have therefore already coalesced. The Site therefore does not prevent coalescence, as this has already occurred.
- 5.21 Development at the Site would inevitably encroach on the open land which separates the northern extents of the settlements at Goring-by-Sea and Ferring. Despite this, it could be accommodated without impacting on the

existing function of the Site, namely to provide a break in urban development along the route of Littlehampton Road, for the following reasons:

- Development would be accommodated in the southern part of the Site only and the northern field would be retained open alongside the route of Littlehampton Road;
- In views from Littlehampton Road a significant break in urban development would be retained;
- New landscaping at the perimeter of the retained farmland / open space, including new hedgerow planting would assist in integrating and maintaining the visual link / connection with the farmland to the north of Littlehampton Road;
- Housing would occupy the immediate foreground of the existing residential area to the south. It would extend the urban area northwards, however would not be at odds with the established settlement pattern;
- The proposals would result in a more considered settlement edge which provides a more appropriate interface with the adjoining open space and farmland; and
- Landscaping along the Ferring Rife, within open space and at the Site boundaries would provide an attractive setting for the new residential area, improved visual containment, and areas of new green infrastructure.

6.0 REVIEW OF THE LANDSCAPE AND ECOLOGY STUDY OF GREENFIELD SITES IN WORTHING BOROUGH

- 6.1 The following section considers the findings of the Landscape and Ecology Study in respect of the Sites suitability to accommodate development. The Study divides the Site into three Zones. Zones B and C occupy the south west corner of the Site, whilst the remainder, which comprises the majority of the Site lies within Zone A. The boundary between Zones A and B follows a diagonal line from the rear of properties on Ferring Lane, extending to a point roughly mid-way along the southern Site boundary, at the point where Chatsmore Catholic High School meets the rear of properties on Singleton Crescent. This boundary does not follow any landscape or topographic feature.
- 6.2 In respect of Zones B and C, the Study states that these zones have a moderate overall sensitivity and, taking into account the inclusion of potential new green infrastructure and the containment of the land within Arun District, a moderate value. The Study concludes that these areas have medium suitability to accommodate development and therefore potential for limited development.
- 6.3 In respect of the sensitivity of Zone A the Study scores the site moderately for landscape quality / intactness. It notes it has a major ecological sensitivity, although acknowledges that the majority of the zone consists of habitats of negligible conservation interest, with the exception of Ferring Rife. It notes that it makes a major contribution to the essential sense of separation of Goring-by-Sea and Ferring and a substantial contribution to the setting of the surrounding settlements. The Study states that there is limited potential to provide mitigation to offset the impact of development in this area.
- 6.4 The Study identifies that the visual sensitivity of Zone A is major. The report notes that the Site forms a prominent part of the middle distance view from Highdown Hill. It is also visible from land to the east of Salvington and at a greater distance from Cissbury Ring. It notes that there are uninterrupted views to the National Park from public footpath 2121.
- 6.5 In respect of landscape value the Study notes that Zone A lies in close proximity of the SDNP and makes a substantial contribution to the setting of the designated landscape. It notes that it makes a substantial contribution to local distinctiveness owing to its visual connection to the South Downs and its undeveloped character within a substantially built up area. The Site also scores highly for public access / recreation owing to the presence of the footpath at the southern boundary and views from it to the National Park. Zone A also has a moderate score for perceptual qualities which include tranquillity and remoteness.

- 6.6 The Study concludes that Zone A has a substantial overall sensitivity to development and its overall value is also substantial. The Study states that 5A therefore has a negligible / low suitability for development.
- 6.7 In respect of Zones B and C we would agree that these are the least sensitive part of the Site due to the containment afforded by existing housing at the edge of Ferring. A small development in this location would however be somewhat constrained by the presence of the existing overhead powerlines which cross this part of the Site. Furthermore, the extent of Zone B bears no relationship to landscape / geographic features or established field pattern and is therefore somewhat arbitrary.
- 6.8 In respect of the wider Zone A, we would agree with HDA's general conclusion that this is the more sensitive part of the Site owing to its proximity to the National Park and its visibility in a number of views from vantage points in the Park. Despite this, it is not suggested that development would be accommodated in the entirety of Zone A. Development to the south of the power lines and Ferring Rife would retain a substantial area of open land alongside the boundary with the SDNP and retain a sense of openness along the route of Littlehampton Road.
- 6.9 The following points are relevant in light of HDAs findings:
- The Site is not covered by any statutory or non-statutory landscape designations. It is largely devoid of intact landscape features and is of limited landscape quality / condition;
 - The Site has few perceptual qualities and cannot reasonably be described as being either tranquil or remote;
 - Development in the southern part of the Site would follow a logical landscape feature in the form of Ferring Rife, as opposed to the arbitrary boundary identified by HDA;
 - There are views of the Site from sensitive receptors in the SDNP however these are seen in the context of built development on the coastal plain. Whilst the Site plays some role in providing an open break in built development these views are less sensitive than other views within the SDNP which are largely free from urban development;
 - As noted the Site provides an area of open space indented into the urban area. It relates strongly to the surrounding urban area of Goring-by-Sea / Ferring and plays a limited role in providing a setting to the SDNP. Open space in the northern part of Zone A would continue to provide a landscaped transition between the urban area and the lower slopes of Highdown Hill;

- The Site has limited ecological value and development can provide ecological enhancements alongside the Ferring Rife corridor and within areas of new open space;
- There are opportunities for improved recreational access to the open space in the northern part of the Site. Although some views from the footpath which borders the railway line to the SDNP would be lost, there would be opportunities for views from the open space to the north;
- Additional development in Zone A would complement housing in Zones B and C and would provide better connectivity to the railway station and local facilities; and
- As set out above, Ferring and Goring-by-Sea have already coalesced and this is acknowledged in the HDA assessment. Retention of the northern part of the Site free from development would maintain a visual break between these built up areas along the route of Littlehampton Road.

6.10 In summary, it is apparent that development in the southern part of Zone A would be well related to the surrounding urban area and that Ferring Rife provides a logical extent to development in this location, rather than the arbitrary boundary identified by HDA. In addition, retention of the land open in the northern part of the Site would maintain a visual break in the urban fabric and would protect the setting of the SDNP. Taking into account these factors, in our view, a greater quantum of housing can be provided in this location than suggested in the HDA Study.

7.0 CONCLUSION

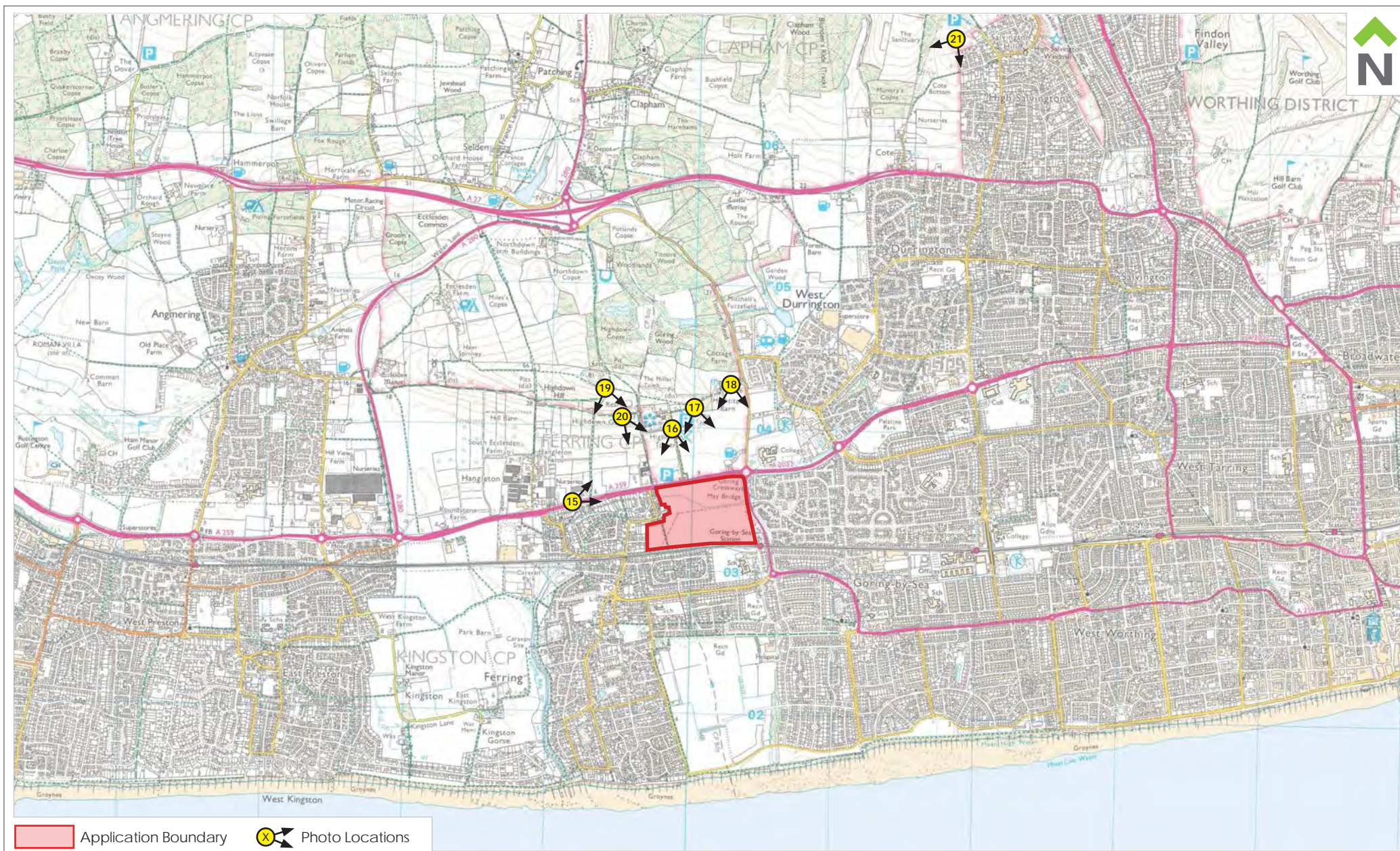
- 7.1 The Site at Chatsmore Farm is being promoted for development through the emerging Worthing Borough Local Plan. The emerging Local Plan acknowledges that growth in the Borough is very constrained and that the Council has only identified an overall development capacity of 4,182 dwellings which can be delivered within the plan period. This represents a shortfall of 8,619 dwellings based on the Council's own objectively assessed housing need. The Council admits that only 33% of the overall housing need will be met. The Council's spatial strategy is therefore grossly inadequate and results in a significant shortfall in the required level of housing to meet the Borough's needs.
- 7.2 The Site is not identified as a development allocation in the Draft Worthing Borough Local Plan. Draft policies SP5 and SP6 identify the land at Chatsmore Farm as a Local Green Gap and a Local Green Space. Separate representations have been prepared by CSA in respect of these emerging policies and this document focuses on the suitability of the Site to accommodate development from a landscape and visual perspective.
- 7.3 The Site occupies a rectangular land parcel which forms an indentation in the built form between the adjoining settlements of Ferring and Worthing. A short distance to the north, beyond Littlehampton Road, is the start of the SDNP. The majority of the land under the control of Persimmon Homes Thames Valley is within Worthing Borough, however the small rectangular field to the south west lies within Arun District. For completeness this overview considers the entire land holding.
- 7.4 Although the proposals lie outside the existing built up area boundary, the Site is well related to the existing urban area, in a sustainable location and would represent a planned release of land to meet local housing needs.
- 7.5 This appraisal found that in landscape terms the Site is undistinguished and contains few landscape features which would prove a constraint to development. Due to its relatively open character there are numerous opportunities for near distance views from the immediate area, however middle distance views from the south, east and west are prevented by intervening development. There are some views from the higher ground in the SDNP to the north of the Site.
- 7.6 Residential development is being promoted in the southern part of the Site only, with Ferring Rife retained within an area of open space, and the land to the north retained as open space / farmland.
- 7.7 The Site does provide a 'break in the built form between Goring-by-Sea and Ferring. Draft policy SP5 identifies the land at Chatsmore Farm as a Local

Green Gap which serves to prevent coalescence between these neighbouring settlements. Our assessment of the Site found that coalescence has already occurred to the south of the Site. Whilst development will extend into the open land between the settlements it can be accommodated in a manner which retains a significant break within the built up area.

- 7.8 Worthing Borough Council commissioned HDA to undertake a landscape and ecology study to inform policy and potential development options in the emerging Local Plan. This Study concluded that Zone A (which comprises the majority of the Site) has a negligible / low suitability for development.
- 7.9 Our own assessment concluded that development in the southern part of Zone A would be well related to the surrounding urban area and that Ferring Rife provides a logical extent to development in this location, rather than the arbitrary boundary identified by HDA. In addition, retention of the land open in the northern part of the Site would maintain a visual break in the urban fabric and would protect the setting of the SDNP. Taking into account these factors, in our view, a greater quantum of housing can be provided in this location than suggested in the HDA Study. This would go some way to meeting the housing shortfall identified in the Draft Worthing Borough Local Plan.

Appendix A

Site Location Plan
(Showing middle to long distance photo locations)



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Project Chatsmore Farm, Goring-by-Sea
Drawing Title Site Location Plan
Client Persimmon Homes Thames Valley

Date May 2018
Drawing No. CSA/2304/106
Scale @ A4 NTS
Rev -
Drawn JB
Checked CA

Appendix B

Aerial Photograph
(Showing near distance photo locations)



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Project	Chatsmore Farm, Goring-by-Sea
Drawing Title	Aerial Photograph
Client	Persimmon Homes Thames Valley

Date May 2018

Scale @ A4 NTS

Drawn JB

Drawing No. CSA/2304/107

Rev -

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Appendix C

Photosheets



View south west across Site (May 2018) **Photograph 01**



Ferring Rife (May 2018) **Photograph 02**



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View north from Ferring Rife (May 2018) **Photograph 03**



View east across Site (May 2018) **Photograph 04**



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View along Ferring Lane (May 2018) **Photograph 05**



View east from Ferring Lane over Ferring Rife (May 2018) **Photograph 06**



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View east along Littlehampton Road (May 2018) **Photograph 07**



View south and east from Littlehampton Road (May 2018) **Photograph 08**



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View of south west corner of the Site (May 2018) **Photograph 09**



View across the Site from boundary with the railway line (May 2018) **Photograph 10**

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	Drawing Title	Photosheets	Date	May 2018		
	Client	Persimmon Homes Thames Valley	Drawn	JB	Checked	CA



View from footbridge at Goring-by-Sea Station (May 2018) **Photograph 11**



View from Goring Street (May 2018) **Photograph 12**



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View from the junction of Goring Street and The Strand (May 2018) **Photograph 13**



View from footbridge over Littlehampton Road (May 2018) **Photograph 14**



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View east along Littlehampton Road (May 2018) **Photograph 15**



View from access road leading to Highdown Hill carpark (May 2018) **Photograph 16**



View from public vantage point on Highdown Hill (May 2018) **Photograph 17**



View from footpath adjacent to Hightiten Barn (May 2018) **Photograph 18**



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View from summit of Highdown Hill (May 2018) **Photograph 19**



View from Highdown Hill (May 2018) **Photograph 20**



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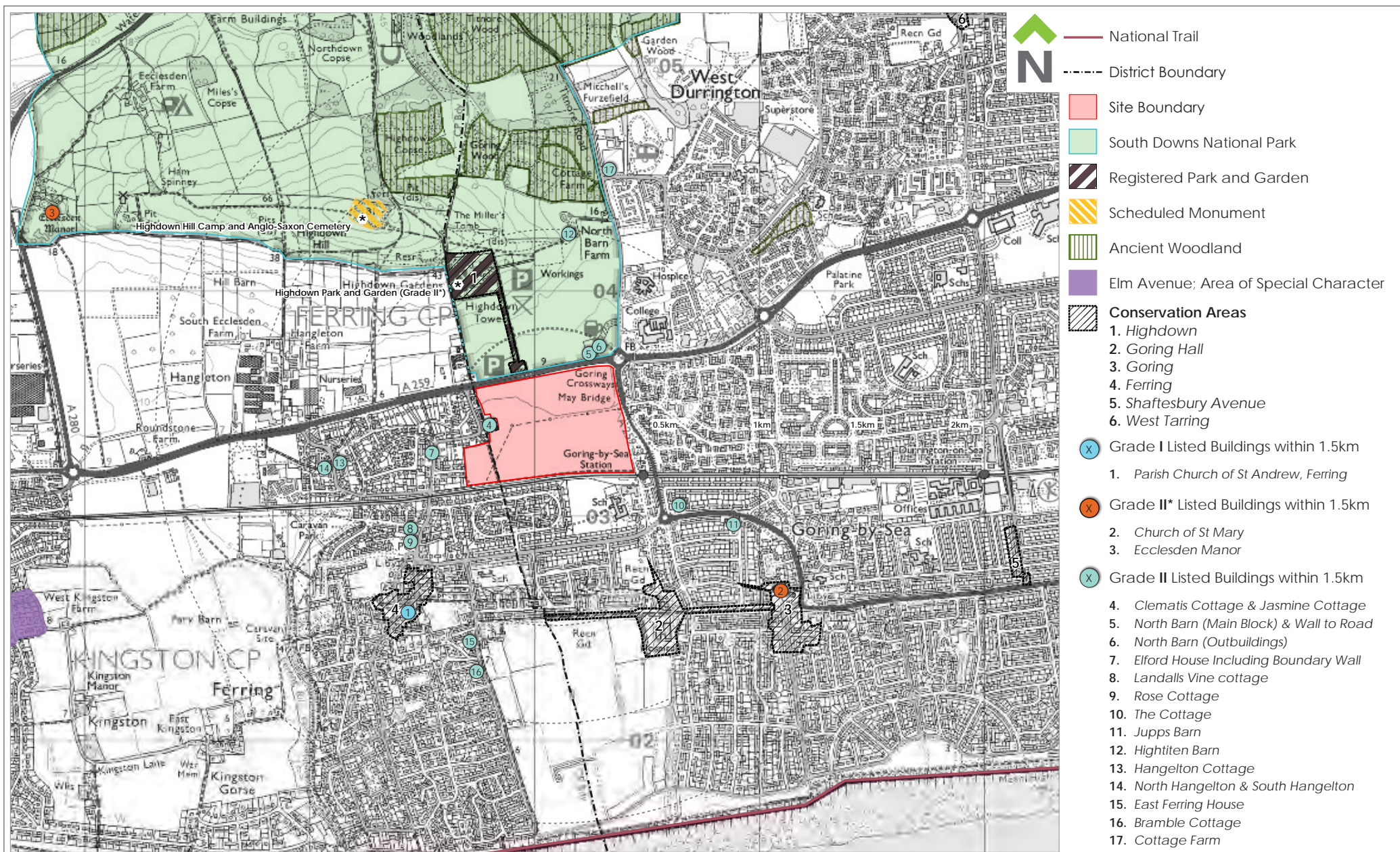


View from open space at West Hill (May 2018) **Photograph 21**

Project	Chatsmore Farm, Goring-by-Sea	Drawing No.	CSA/2304/108	Rev	-
Drawing Title	Photosheets	Date	May 2018		
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Appendix D

MAGIC map and Heritage Information



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Project Chatsmore Farm, Goring-by-Sea

Drawing Title MAGIC Map Extract & Heritage Plan

Client Persimmon Homes Thames Valley

Date May 2018

Drawing No. CSA/2304/109

Scale @ A4 NTS

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Appendix E

Extract from Landscape and Ecology Study of Greenfield
Sites in Worthing Borough, November 2015

SITE 5: CHATSMORE FARM

Landscape Structure

- 5.74 A flat site, underlain by chalk with superficial sand and gravel deposits, adjacent to the southern edge of the South Downs National Park. The site consists of two large arable fields, separated by Ferring Rife which flows east to west through the northern half of the site. A line of pylons also runs east-west through the middle of the site.
- 5.75 The site is bounded by broken vegetation of varying density including bushes and occasional small tree groups, within or adjacent to the site's southern, eastern and western boundaries. Ferring Rife has limited significant riparian vegetation, including occasional shrubs/small trees. The site is surrounded by existing development to the south, east and west, including 3 storey buildings to the north-east and multi-storey flats to the south-east. The A259 forms the sites northern boundary. The railway line runs along the southern edge of the site. Footpath 2121 also runs along the southern boundary (within the site), and footpath 2121/1 runs along part of the western boundary.

Landscape Character

- 5.76 The site is located in the low lying flat open landscape of the 'Littlehampton and Worthing Fringes' county character area (area SC11), and is part of the 'Goring Coastal Plain' local landscape character area characterised by open large scale arable fields which continue to the north and west beyond the A259 road.

Settlement Pattern

- 5.77 Prior to the 20th century, Goring-by-Sea and Ferring were small nucleated settlements some distance from the site. During the 1950s, Goring Way was lined with houses, establishing a linear link of settlement between Goring-by-Sea and Ferring, about 200m to the south of the site. During the 1960s, much of the current housing to the east and west was in place, with housing in Ferring reaching level with the northern edge of the site, and housing reaching north from Goring Way to the railway along the southern edge of the site. The full extent of housing which borders the site to the east was reached during the 1980s, and multi-storey buildings have recently been constructed to the south-east of the site on the opposite side of the railway. However, an open area remains adjacent to the south, beyond the railway as school playing fields.
- 5.78 Worthing has also spread north towards West Durrington, but no substantial development has taken place immediately north of the site within the vicinity of Highdown Hill. The site remains as a continuation of the open landscape to the north, separating the northern settlement patterns of Worthing and Ferring when viewed from the north. If the site is developed in its entirety, the areas of settlement to the east and west of the site would coalesce.

Ecology Summary (see Appendix A for full summary)

- 5.79 The site is dominated by habitats of negligible conservation interest in their own right including arable land, species-poor grassland, scrub and defunct hedgerows, and a small numbers of trees which are generally young and/or comprise non-native species. Linear vegetative features, such as hedgerows and scrub lines with trees do however provide suitable opportunities for movement of wildlife and compliment habitats in the wider area so are considered in combination to be of local wildlife value.
- 5.80 The feature of greatest ecological interest within the site is Ferring Rife and the corridor of semi-

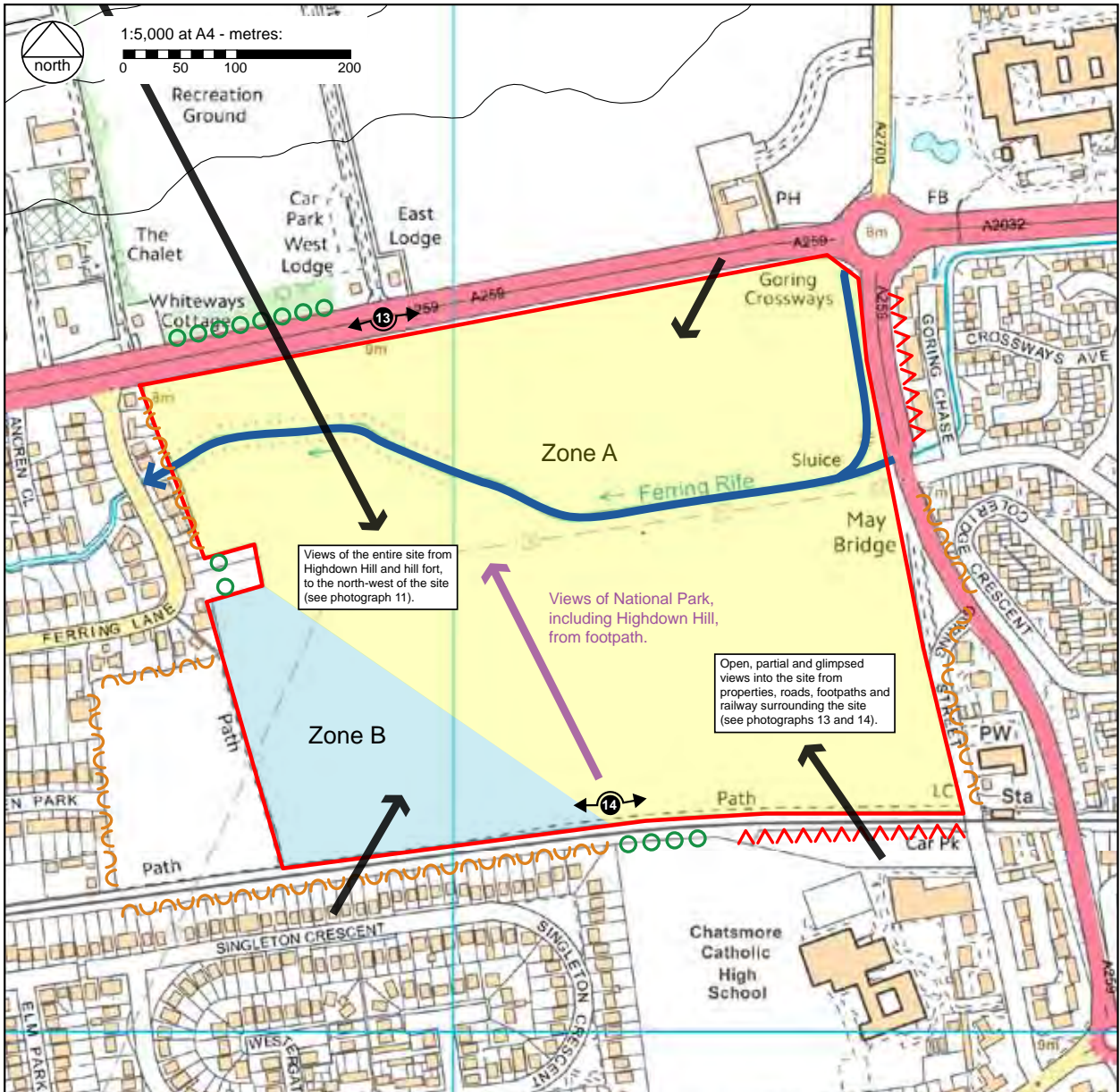


Figure 22: Site 5 Analysis

Based on mapping data licensed from Ordnance Survey, Crown copyright.

KEY

	Site boundary		Filtered urban edge
	Zone A		Hard urban edge
	Zone B		Separation between settlements
	Contours (5m intervals)		Significant watercourse
	Ridgelines / spurs		Key views into the site
	Valley feature		Key views out from the site
	Prominent slope		Photograph locations
	Containment e.g. boundary vegetation / woodland		

natural habitats through which it flows, which in combination are considered to form a significant part of a wider habitat of district value.

Visual Assessment

- 5.81 **Zone A** is open to view from Highdown Hill and its hill fort within the South Downs National Park to the north, and forms a prominent part of the middle distance within the view (see photograph 11). The zone is seen in context with existing settlement on three sides and the English Channel on the horizon, and forms an effective gap in the view of development along the coastal plain. The view of open space continues slightly south of the railway line into the school playing fields to the south-east of the site.
- 5.82 The zone is also visible from high ground within the National Park to the east of High Salvington (see photograph 12), and at a greater distance from Cissbury Ring, which is a Scheduled Ancient Monument hill fort within the National Park to the north of Worthing.
- 5.83 At closer range, Zone A is open to view from footpaths 2121 and 2121/1, from the A259 (see photograph 13), and although partially filtered by vegetation in places, is visible from properties and railway passengers which face onto the site. The zone forms effective separation between Goring and Ferring when travelling along the A259 road. There are uninterrupted views to the National Park, including Highdown Hill from public footpath 2121 along the southern edge of the site (see photograph 14).

- 5.84 The visual sensitivity of the **Zone A** is judged to be **Major**. This rating feeds into the overall sensitivity assessment table on page 52.
- 5.85 Zone B is visible from high ground within the National Park (see Photograph 11). However, Zone B, along with adjacent land within Arun District to the west, is partially contained to the north by vegetation along the north-western site boundary, and forms a less prominent part of the visual separation between Goring and Ferring than Zone A.
- 5.86 The visual sensitivity of Zone B is judged to be Moderate. This rating feeds into the overall sensitivity assessment table on page 52.



Photograph 11 (Sites 4 and 5) Looking south from Highdown hill fort.



Photograph 12 (Sites 5, 6, 7 and 8) Looking south-west, from South Downs National park west of High Salvington.



Photograph 13 (Site 5) Looking east to south from the A259. Continues right



Continued from left. Looking south to west.



Photograph 14 (Site 5) Looking west to north from footpath 2121. Continues right.



Continued from left. Looking north to east.

Site 5 Zone A Sensitivity

5.87 Each element of the sensitivity assessment for Site 5 Zone A, and an overall judgement based on a 5 point scale, are set out below.

Inherent Landscape quality (intactness and condition)	Ecological sensitivity	Inconsistency with existing settlement form/ pattern	Contribution to separation between settlements	Contribution to the setting of surrounding landscape/settlement	Views (visual sensitivity)	Potential for mitigation (inverse score i.e. high potential for mitigation = low sensitivity, therefore low score)	Overall sensitivity judgement 01-07 = Negligible 08-14 = Slight 15-21 = Moderate 22-28 = Substantial 29-35 = Major
3	4	2	5	4	5	4	28
Limited intact boundary features or vegetation along Ferring Rife, but recorded by Natural England as grade 1 agricultural land.	The majority of the zone consists of habitats of negligible conservation interest. However, Ferring Rife and the corridor of semi-natural habitats through which it flows, are in combination considered to form a significant part of a wider habitat of district value.	Development of the zone would not set a precedent in terms of extent of development on the coastal plain in the locality, but would remove the northern gap between Goring and Ferring.	Zone provides an essential sense of separation between Goring and Ferring, despite development to the south.	Provides an open aspect in an otherwise developed coastal plain and connection to the South Downs National Park.	The zone is prominent in views from Highdown Hill within the South Downs National Park, and is visible from Cissbury Ring. The site is visible at closer range from surrounding viewpoints, and provides openness and settlement separation when viewed from the A259 between Ferring and Goring. There are uninterrupted views to the National Park from public footpath within the south of the site (see visual assessment).	Maintain open visual dimension of the gap, with the exception of the south-west corner of the site where there is potential to recreate hedges along boundaries. Enhance riparian vegetation along Ferring Rife without damaging openness of main views.	SUBSTANTIAL

Site 5 Zone B Sensitivity

5.88 Each element of the sensitivity assessment for Site 5 Zone B, and an overall judgement based on a 5 point scale, are set out below.

Inherent Landscape quality (intactness and condition)	Ecological sensitivity	Inconsistency with existing settlement form/ pattern	Contribution to separation between settlements	Contribution to the setting of surrounding landscape/settlement	Views (visual sensitivity)	Potential for mitigation (inverse score i.e. high potential for mitigation = low sensitivity, therefore low score)	Overall sensitivity judgement 01-07 = Negligible 08-14 = Slight 15-21 = Moderate 22-28 = Substantial 29-35 = Major
3	2	1	3	3	3	4	19
Limited intact boundary features, but recorded by Natural England as grade 1 agricultural land.	The majority of the zone consists of habitats of negligible conservation interest.	Development of the zone would be 'infill' between surrounding housing, but would not result in the loss of the gap between Goring and Ferring.	Part of the wider separation between Goring and Ferring, but has a less prominent contribution than Zone A.	Provides an open aspect to surrounding settlement.	The zone is visible from Highdown Hill within the South Downs National Park, but is more contained than Zone A and forms a less prominent part of the visual separation between Goring and Ferring (see visual assessment).	Potential to recreate hedges along existing boundaries, and to plant new hedgerow and tree groups along the boundary with Zone A, to form a robust vegetated edge to settlement if the zone is developed.	MODERATE

Site 5 Zone A Value

5.89 Each element of the value assessment for Site 5 Zone A, and an overall judgement based on a 5 point scale, are set out below.

Landscape designations	Ecological and other designations (eg. heritage, flood zone etc)	Local distinctiveness	Any historic/cultural/ literary associations	Contribution to setting of 'outstanding assets'	Recreation and public access/ locally valued spaces	Perceptual aspects (eg. scenic quality, tranquillity, and remoteness)	Overall value judgement 01-07 = Negligible 08-14 = Slight 15-21 = Moderate 22-28 = Substantial 29-35 = Major
<div><div></div><div></div><div></div><div>4</div><div></div></div>	<div><div></div><div></div><div>3</div><div></div><div></div></div>	<div><div></div><div></div><div></div><div>4</div><div></div></div>	<div><div>1</div><div></div><div></div><div></div><div></div></div>	<div><div></div><div></div><div></div><div>4</div><div></div></div>	<div><div></div><div></div><div></div><div>4</div><div></div></div>	<div><div></div><div></div><div>3</div><div></div><div></div></div>	<div><div></div><div></div><div></div><div>23</div><div></div></div>
Adjacent to the South Downs National Park to the north.	Adjacent to the Highdown Conservation Area and several listed buildings. The Environment Agency's Flood Zones 2 and 3 covers a significant portion of the site along Ferring Rife.	Visual connectivity with Highdown and the South Downs National Park to the north. The zone has a degree of distinctiveness locally in that it is part of one of the few open gaps in settlement along the coastal plain.	Borders southern extension of Highdown Conservation Area, on the other side of the A259.	Forms an undeveloped setting to the South Downs National Park.	Public footpaths along the southern boundary, with views of the National Park, and Goring railway station within close proximity to the south-east. Centre of the site, including along Ferring Rife, is used for dog walking.	Limited due to land use and surrounding human influence, but provides a relief to surrounding built up areas and open undeveloped views north towards the National Park.	SUBSTANTIAL

Site 5 Zone B Value

5.90 Each element of the value assessment for Site 5 Zone B, and an overall judgement based on a 5 point scale, are set out below.

Landscape designations	Ecological and other designations (eg. heritage, flood zone etc)	Local distinctiveness	Any historic/cultural/ literary associations	Contribution to setting of 'outstanding assets'	Recreation and public access/ locally valued spaces	Perceptual aspects (eg. scenic quality, tranquillity, and remoteness)	Overall value judgement 01-07 = Negligible 08-14 = Slight 15-21 = Moderate 22-28 = Substantial 29-35 = Major
<div><div></div><div></div><div></div><div>4</div><div></div></div>	<div><div></div><div>2</div><div></div><div></div><div></div></div>	<div><div></div><div></div><div></div><div>4</div><div></div></div>	<div><div>1</div><div></div><div></div><div></div><div></div></div>	<div><div></div><div></div><div></div><div>4</div><div></div></div>	<div><div></div><div></div><div></div><div>4</div><div></div></div>	<div><div></div><div></div><div>3</div><div></div><div></div></div>	<div><div></div><div></div><div></div><div>22</div><div></div></div>
Within close proximity of the South Downs National Park to the north.	Within close proximity of listed building to the north. The Environment Agency's Flood Zones 2 and 3 are also close to the north.	Visual connectivity with Highdown and the South Downs National Park to the north. The zone has a degree of distinctiveness locally in that it is part of one of the few open gaps in settlement along the coastal plain.	Close proximity to Highdown Conservation Area, on the other side of the A259.	Forms a part of an undeveloped setting to the South Downs National Park.	Public footpaths along the southern and western boundaries, with views of the National Park, and Goring railway station within close proximity to the east.	Limited due to land use and surrounding human influence, but provides a relief to surrounding built up areas and open undeveloped views north towards the National Park.	SUBSTANTIAL



Green Infrastructure

Landscape

5.91 Key considerations should include (see plan left):

1. Maintain undeveloped landscape as part of effective separation between Goring-by-Sea and Ferring, and break in settlement when viewed from the north, particularly the area defined by the dashed line on plan.
2. Enhance riparian vegetation along Ferring Rife, without effecting openness of the main views.
3. Protect public rights of way, including link to Goring-by-Sea railway station.
4. Strengthen boundary vegetation, in particular along the A259 road, without damaging the the main open view.
5. Potential to plant new woodland tree belt to form robust vegetated edge to 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.

Ecology

5.92 Features of local and district value should be retained and where appropriate enhanced through management and complimentary habitat creation. Ways in which this could be achieved include:

- Enhancement of the Ferring Rife corridor through bank reprofiling, creation of side channels and backwaters, management of scrub to reduce overshading, provision of complimentary native scrub, tree and hedgerow planting, marginal and aquatic planting, and management of non-native invasive species.
- Enhancement of wildlife corridors through appropriate management and complimentary planting to improve existing features, and creation of new linear semi-natural habitats such as species-rich hedgerows and treelines.
- Creation of a range of habitats with high wildlife interest within areas of public open space such as species-rich grassland, native scrub, hedgerows, woodland and wetlands.
- Creation of new opportunities for roosting bats and nesting birds through provision of bird and bat boxes on existing trees and new buildings.
- Use native species typical of the local area in landscape planting where appropriate to do so. Where possible these should be sourced from stock of local provenance.
- Prioritising the use of plants which benefit native wildlife within formal landscaping schemes, including nectar- and pollen-rich and fruit- and nut-producing species.

Appendix F

Extract from Landscape and Ecology Study of Greenfield Sites in
Worthing Borough – Review of Low Suitability Sites, March 2017

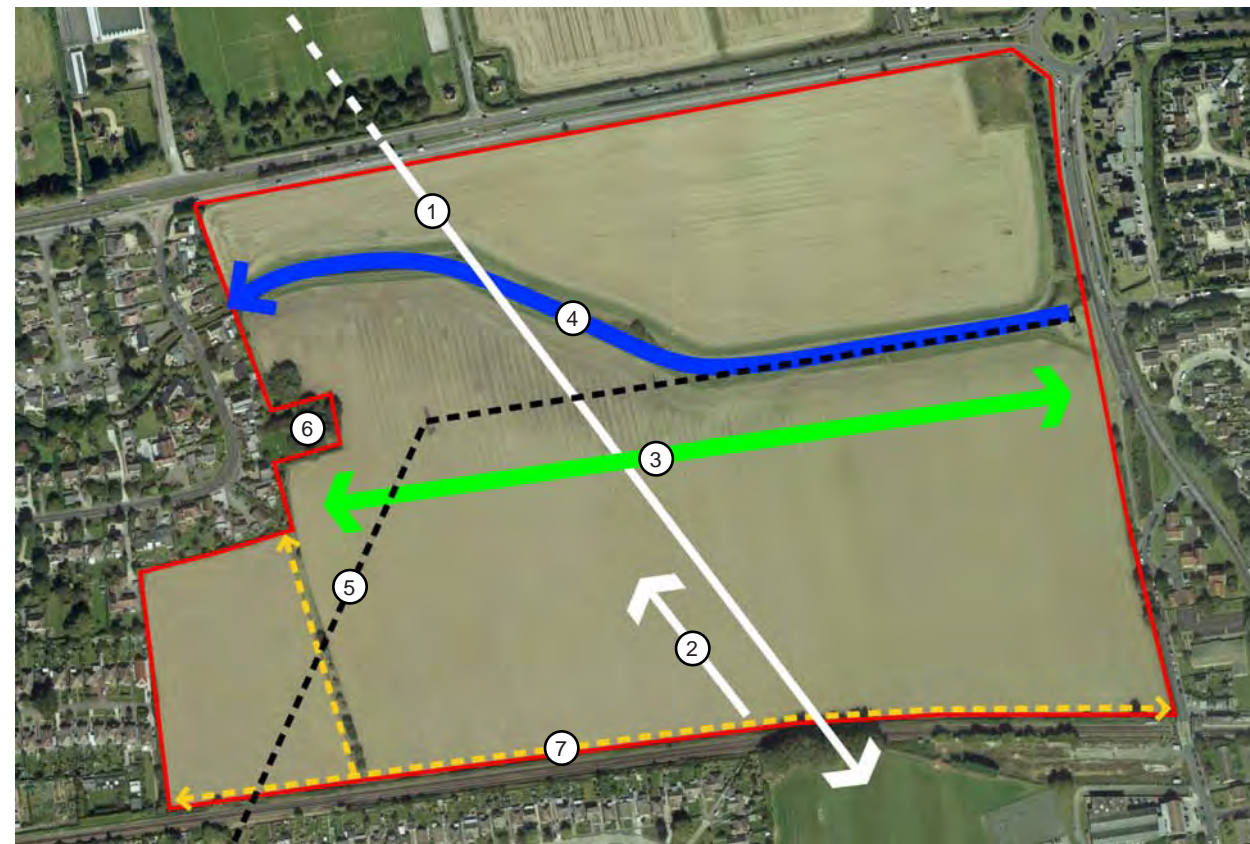


Figure D Site 5 constraints and opportunities (the site is considered as a whole, however areas 5A and 5B identified within the original 2015 Worthing study, and the additional area 5C within Arun are indicated on Figure A)



Figure E Site 5 green infrastructure and development area (the site is considered as a whole, however areas 5A and 5B identified within the original 2015 Worthing study, and the additional area 5C within Arun, are indicated on Figure A)

SITE 5B & 5C: ANALYSIS

3.8 Landscape Constraints

(see figure D)

1. Site 5 is visible from the National Park to the north, in particular from Highdown Hill. The site is seen in context with the built up area on three sides and the English Channel on the horizon, and there is a visual connection across the site to open space associated with the school to the south of the railway (see photograph 39).
2. Public rights of way cross the southern part of the site. The eastern half of the public footpath north of the railway has relatively uninterrupted views across the site towards the National Park, in particular Highdown Hill (see photograph 40). There are also views across the site towards Highdown Hill from passing trains, although views are filtered in places by lineside vegetation.
3. The site provides separation between Worthing and the eastern edge of Ferring.
4. Ferring Rife flows towards the west through the central and northern parts of the site.
5. Pylons and overhead cables run through the site and continue over existing housing to the south-west.

3.9 Landscape Opportunities

(see figure D)

6. A small tree group lies at the western edge of the site. This could be extended through additional tree planting within the site.
7. Public rights of way within the southern part of the site should be retained and should be enhanced with new links.

SITE 5B & 5C: POTENTIAL GREEN INFRASTRUCTURE AND DEVELOPMENT

3.10 Potential Green Infrastructure Proposals

(see figure E)

8. Incorporate belt of woodland planting to extend the existing tree group to obscure potential development to the south.
9. Plant hedge and trees along potential eastern extent of development to limit future potential views of housing from the east across the gap to Worthing.
10. Retain open space across the gap to Worthing, and allowing visual link across the site from the Highdown Hill to the open space associated with the school to the south of the railway.
11. Provide alternative footpath link to the north of the potential development area thereby maintaining views of Highdown Hill to the north.

3.11 Potential Development Area

(see figure E)

12. Potential development should be located within the south-west corner of the site, developed in association with the area within Arun to form a logical extension to Ferring, maintaining the gap between Worthing and Ferring, conserving the visual link across the site from the National Park to the open space associated with the school to the south of the railway, and retaining views of Highdown Hill from the majority of the public rights of way.
13. The potential development area in this part of the sit could be maximised by undergrounding of the overhead cables.



Photograph 39 View from public footpath across Highdown Hill within the National Park, looking south-east.



Photograph 40 View from public footpath along the southern boundary of the site, looking north-west.

SITE 5B & 5C: REVIEW OF SENSITIVITY AND VALUE ASSESSMENTS

3.12 Following detailed survey work during winter 2016, and drawing on the opportunities and constraints analysis above, the tabulated sensitivity and value assessment prepared as part of the 2015 study have been reassessed against the potential green infrastructure proposals and potential development area set out above. The original 2015 tables are presented below, along with replacement tables for the reassessment findings.

Site 5B & 5C Sensitivity:

Inherent Landscape quality (intactness and condition)	Ecological sensitivity	Inconsistency with existing settlement form/ pattern	Contribution to separation between settlements	Contribution to the setting of surrounding landscape/settlement	Views (visual sensitivity)	Potential for mitigation (inverse score i.e. high potential for mitigation = low sensitivity, therefore low score)	Overall sensitivity judgement 01-07 = Negligible 08-14 = Slight 15-21 = Moderate 22-28 = Substantial 29-35 = Major
<div><div></div><div></div><div>3</div><div></div><div></div></div>	<div><div></div><div>2</div><div></div><div></div><div></div></div>	<div><div>1</div><div></div><div></div><div></div><div></div></div>	<div><div></div><div></div><div>3</div><div></div><div></div></div>	<div><div></div><div></div><div>3</div><div></div><div></div></div>	<div><div></div><div></div><div>3</div><div></div><div></div></div>	<div><div></div><div></div><div></div><div>4</div><div></div></div>	<div><div></div><div></div><div>19</div><div></div><div></div></div>
Limited intact boundary features, but recorded by Natural England as grade 1 agricultural land.	The majority of the zone consists of habitats of negligible conservation interest.	Development of the zone would be ‘infill’ between surrounding housing, but would not result in the loss of the gap between Goring and Ferring.	Part of the wider separation between Goring and Ferring, but has a less prominent contribution than Zone A.	Provides an open aspect to surrounding settlement.	The zone is visible from Highdown Hill within the South Downs National Park, but is more contained than Zone A and forms a less prominent part of the visual separation between Goring and Ferring (see visual assessment).	Potential to recreate hedges along existing boundaries, and to plant new hedgerow and tree groups along the boundary with Zone A, to form a robust vegetated edge to settlement if the zone is developed.	MODERATE

Revisions to findings taking into account potential green infrastructure proposals and potential development areas:

<div><div></div><div></div><div>3</div><div></div><div></div></div>	<div><div></div><div>2</div><div></div><div></div><div></div></div>	<div><div>1</div><div></div><div></div><div></div><div></div></div>	<div><div></div><div></div><div>3</div><div></div><div></div></div>	<div><div></div><div></div><div>3</div><div></div><div></div></div>	<div><div></div><div></div><div>3</div><div></div><div></div></div>	<div><div>1</div><div></div><div></div><div></div><div></div></div>	<div><div></div><div></div><div>16</div><div></div><div></div></div>
No change.	No change.	No change.	No change.	No change.	No change.	Comprehensive mitigation planting and limited development area as shown on figure E.	No change

Site 5B & 5C Value:

Landscape designations					Ecological and other designations (eg. heritage, flood zone etc)					Local distinctiveness					Any historic/cultural/ literary associations					Contribution to setting of 'outstanding assets'					Recreation and public access/ locally valued spaces					Perceptual aspects (eg. scenic quality, tranquillity, and remoteness)					Overall value judgement 01-07 = Negligible 08-14 = Slight 15-21 = Moderate 22-28 = Substantial 29-35 = Major				
			4			2							4		1									4				3								22			
Within close proximity of the South Downs National Park to the north.					Within close proximity of listed building to the north. The Environment Agency's Flood Zones 2 and 3 are also close to the north.					Visual connectivity with Highdown and the South Downs National Park to the north. The zone has a degree of distinctiveness locally in that it is part of one of the few open gaps in settlement along the coastal plain.					Close proximity to Highdown Conservation Area, on the other side of the A259.					Forms a part of an undeveloped setting to the South Downs National Park.					Public footpaths along the southern and western boundaries, with views of the National Park, and Goring railway station within close proximity to the east.					Limited due to land use and surrounding human influence, but provides a relief to surrounding built up areas and open undeveloped views north towards the National Park.					SUBSTANTIAL				

Revisions to findings taking into account potential green infrastructure proposals and potential development areas:

			4			2						3				1								3							4							3						20		
No change.					No change.					Now incorporates area within Arun which is surrounded by development on three sides and is less distinctive than the main open gap between Goring and Ferring which is visible from Highdown.					No change.					Now incorporates area within Arun which is surrounded by development on three sides and has less of a contribution to the setting of the National Park that the main open gap between Goring and Ferring which is visible from Highdown.					No change.					No change.					Change to: MODERATE											

SITE 5B & 5C: REVIEW OF SUITABILITY FOR DEVELOPMENT

3.13 Suitability is determined by combining sensitivity and value using the inverse matrix shown on page 3. The original 2015 study judged site 5B to have a **Low** suitability. Taking into account the potential green infrastructure proposals and potential development area set out in this updated study, the combined suitability of sites 5B and 5C is considered to be **Moderate** as follows:

Moderate sensitivity x Moderate value = Medium suitability for development

3.14 Sites with a medium suitability are considered to have potential for limited development which should have regard for the setting of outstanding assets such as the National Park, and should take account of the form of existing settlement and the character and sensitivity of adjacent landscapes. In this instance, development within the site should be limited to the development area indicated on figure E, provided the green infrastructure proposals set out are incorporated.

Appendix G

Development Framework Plan

Appendix H

Methodology

METHODOLOGY FOR LANDSCAPE AND VISUAL IMPACT ASSESSMENTS

- M1 In landscape and visual impact assessment, a distinction is normally drawn between *landscape/townscape effects* (i.e. effects on the character or quality of the landscape (or townscape), irrespective of whether there are any views of the landscape, or viewers to see them) and *visual effects* (i.e. effects on people's views of the landscape, principally from residential properties, but also from public rights of way and other areas with public access). Thus, a development may have extensive landscape effects but few visual effects (if, for example, there are no properties or public viewpoints nearby), or few landscape effects but substantial visual effects (if, for example, the landscape is already degraded or the development is not out of character with it, but can clearly be seen from many residential properties and/or public areas).
- M2 The assessment of landscape & visual effects is less amenable to scientific or statistical analysis than some environmental topics and inherently contains an element of subjectivity. However, the assessment should still be undertaken in a logical, consistent and rigorous manner, based on experience and judgement, and any conclusions should be able to demonstrate a clear rationale. To this end, various guidelines have been published, the most relevant of which (for assessments of the effects of a development, rather than of the character or quality of the landscape itself), form the basis of the assessment and are as follows:-
- 'Guidelines for Landscape & Visual Impact Assessment', produced jointly by the Institute of Environmental Assessment and the Landscape Institute (GLVIA 3rd edition 2013); and
 - 'An Approach to Landscape Character Assessment', October 2014 (Christine Tudor, Natural England) to which reference is also made. This stresses the need for a holistic assessment of landscape character, including physical, biological and social factors.

LANDSCAPE/TOWNSCAPE EFFECTS

- M3 Landscape/townscape quality is a subjective judgement based on the value and significance of a landscape/townscape. It will often be informed by national, regional or local designations made upon it in respect of its quality e.g. AONB. Sensitivity relates to the ability of that landscape/townscape to accommodate change.

Landscape sensitivity can vary with:-

- existing land use;*
- the pattern and scale of the landscape;*
- visual enclosure/openness of views, and distribution of visual receptors;*
- the scope for mitigation, which would be in character with the existing landscape; and*
- the value placed on the landscape.*

- M4 There is a strong inter-relationship between landscape/townscape quality and sensitivity as high quality landscapes/townscapes usually have a low ability to accommodate change.
- M5 For the purpose of our assessment, landscape/townscape quality and sensitivity has been combined and is assessed using the criteria in Table LE1. Typically, landscapes/townscapes which carry a quality designation and which are otherwise

attractive or unspoilt will in general be more sensitive, while those which are less attractive or already affected by significant visual detractors and disturbance will be generally less sensitive.

- M6 The concept of landscape/townscape value is also considered, in order to avoid consideration only of how scenically attractive an area may be, and thus to avoid undervaluing areas of strong character but little scenic beauty. Landscape value is:

'The relative value that is attached to different landscapes by society, bearing in mind that a landscape may be valued by different stakeholders for a whole variety of reasons.'

- M7 Nationally valued landscapes are recognised by designation, such as National Parks and Areas of Outstanding Natural Beauty ('AONB') which have particular planning policies applied to them. Nationally valued townscapes are typically those covered by a Conservation Area or similar designation.
- M8 The magnitude of change is the scale, extent and duration of change to a landscape arising from the proposed development and was assessed using the criteria in Table LE2.
- M9 Landscape/townscape effects were assessed in terms of the interaction between the magnitude of the change brought about by the development and the quality, value & sensitivity of the landscape resource affected. The landscape/townscape effects can be either beneficial or adverse.
- M10 In this way, landscapes of the highest sensitivity and quality, when subjected to a high magnitude of change from the proposed development, are likely to give rise to 'substantial' landscape effects which can be either adverse or beneficial. Conversely, landscapes of low sensitivity and quality, when subjected to a low magnitude of change from the proposed development, are likely to give rise to only 'slight' or neutral landscape effects. Beneficial landscape effects may arise from such things as the creation of new landscape features, changes to management practices and improved public access. For the purpose of this assessment the landscape effects have been judged at completion of the development.

VISUAL EFFECTS

- M11 Visual effects are concerned with people's views of the landscape/townscape and the change that will occur. Like landscape effects, viewers or receptors are categorised by their sensitivity. For example, views from private dwellings are generally of a higher sensitivity than those from places of work.
- M12 In describing the content of a view the following terms are used:-
- No view - no views of the development;
 - Glimpse - a fleeting or distant view of the development, often in the context of wider views of the landscape;
 - Partial - a clear view of part of the development only;
 - Filtered - views to the development which are partially screened, usually by intervening vegetation - the degree of filtering may change with the seasons;
 - Open - a clear view to the development.
- M13 The sensitivity of the receptor was assessed using the criteria in Table VE1.
- M14 The magnitude of change is the degree in which the view(s) may be altered as a result of the proposed development and will generally decrease with distance from its source, until a point is reached where there is no discernible change. The magnitude of change in regard to the views was assessed using the criteria in Table VE2.

- M15 Visual effects were then assessed in terms of the interaction between the magnitude of the change brought about by the development and also the sensitivity of the visual receptor affected.
- M16 Photographs were taken with a digital camera with a lens that approximates to 50mm, to give a similar depth of view to the human eye. In some cases images have been joined together to form a panorama. The prevailing weather and atmospheric conditions, and any effects on visibility are noted.
- M17 Unless specific slab levels of buildings have been specified, the assessment has assumed that slab levels will be within 750mm of existing ground level.

MITIGATION AND RESIDUAL EFFECTS

- M18 Mitigation measures are described as those measures, including any process or activity, designed to avoid, reduce and compensate for adverse landscape and/or visual effects of the proposed development.
- M19 In situations where proposed mitigation measures are likely to change over time, as with planting to screen a development, it is important to make a distinction between any likely effects that will arise in the short-term and those that will occur in the long-term or 'residual effects' once mitigation measures have established. In this assessment, the visual effects of the development have been considered at completion of the entire project and once any landscape mitigation has had an opportunity to establish.
- M20 Mitigation measures can have a residual, positive impact on the effects arising from a development, whereas the short-term impact may be adverse.

ASSESSMENT OF EFFECTS

- M21 The assessment concisely considers and describes the main landscape and visual effects resulting from the proposed development. The narrative text demonstrates the reasoning behind judgements concerning the landscape and visual effects of the proposals. Where appropriate the text is supported by tables which summarise the sensitivity of the views/ landscape, the magnitude of change and describe any resulting effects.

CUMULATIVE EFFECTS

- M22 Cumulative effects are *'the additional changes caused by a proposed development in conjunction with other similar developments or as the combined effect of a set of developments, taken together.'*
- M23 In carrying out landscape assessment it is for the author to form a judgement on whether or not it is necessary to consider any planned developments and to form a judgement on how these could potentially affect a project.

ZONE OF THEORETICAL VISIBILITY (ZTV)

- M24 A ZTV map can help to determine the potential visibility of the site and identify those locations where development at the site is likely to be most visible from the surrounding area. Where a ZTV is considered appropriate for a proposed development the following methodology is used.
- M25 The process is in two stages, and for each, a digital terrain model ('DTM') using Key TERRA-FIRMA computer software is produced and mapped onto an OS map. The DTM is based on Ordnance Survey Landform Profile tiles, providing a digital record of existing

landform across the UK, based on a 10 metre grid. There is the potential for minor discrepancies between the DTM and the actual landform where there are topographic features that are too small to be picked up by the 10 metre grid. A judgement will be made to determine the extent of the study area based on the specific site and the nature of the proposed change, and the reasons for the choice will be set out in the report. The proposed development is introduced into the model as either a representative spot height, or a series of heights, or a detailed 3D model of the development, and a viewer height of 1.7m is used. This is the first stage, or 'bare earth' ZTV which illustrates the theoretical visibility of a proposed development based on topography alone and does not take account of any landscape features such as buildings, woodland or settlements.

- M26 The second stage is to produce a 'with obstructions' ZTV with the same base as the 'bare earth' ZTV, but which gives a more accurate representation of what is 'on the ground'. Different heights are assigned to significant features such as buildings and woodland thus refining the model to aid further analysis. This data is derived from OS Maps and aerial photographs, and verified during the fieldwork, with any significant discrepancies in the data being noted and the map adjusted accordingly. Fieldwork is confined to accessible parts of the site, public rights of way, the highway network and other publically accessible areas.
- M27 The model is based on available data and fieldwork and therefore may not take into account all development or woodland throughout the study area, nor the effect of smaller scale planting or hedgerows. It also does not take into account areas of recent or continuous topographic change from, for instance, mining operations.

Table LE 1

LANDSCAPE / TOWNSCAPE QUALITY, SENSITIVITY AND VALUE

	Very High	High	Medium	Low
Description of the Landscape/Townscape	<p>Landscape Quality: Intact and very attractive landscape which may be nationally recognised/designated for its scenic beauty. e.g. National Park or Area of Outstanding Natural Beauty</p> <p>Townscape Quality: A townscape of very high quality which is unique in its character, and recognised nationally/internationally. e.g. World Heritage Site</p> <p>Sensitivity: A landscape/townscape with a very low ability to accommodate change because such change would lead to a significant loss of valuable features or elements, resulting in a significant loss of character and quality. Development of the type proposed would be discordant and prominent.</p> <p>Value: Very high quality landscape or townscape with Statutory designation for landscape/townscape quality, eg. National Park, conservation area or registered park or garden.</p>	<p>Landscape Quality: A landscape, usually combining varied topography, historic features and few visual detractors. A landscape known and cherished by many people from across the region. e.g. County Landscape Site such as a Special Landscape Area.</p> <p>Townscape Quality: A well designed townscape of high quality with a locally recognised and distinctive character e.g. Conservation Area</p> <p>Sensitivity: A landscape/townscape with limited ability to accommodate change because such change would lead to some loss of valuable features or elements, resulting in a significant loss of character and quality. Development of the type proposed would likely be discordant with the character of the landscape/townscape.</p> <p>Value: High quality landscape or lower quality landscape or with un-fettered public access, eg. commons, public park or designated landscape.</p>	<p>Landscape Quality: Non-designated landscape area, generally pleasant but with no distinctive features, often displaying relatively ordinary characteristics.</p> <p>Townscape Quality: A typical, pleasant townscape with a coherent urban form but with no distinguishing features or designation for quality.</p> <p>Sensitivity: A landscape/townscape with reasonable ability to accommodate change. Change would lead to a limited loss of some features or elements, resulting in some loss of character and quality. Development of the type proposed would not be especially discordant.</p> <p>Value: A landscape of local value which may have limited public access. No recognised statutory designation for landscape / townscape quality.</p>	<p>Landscape / Townscape Quality: Unattractive or degraded landscape/townscape, affected by numerous detracting elements e.g. industrial areas, infrastructure routes and un-restored mineral extractions.</p> <p>Sensitivity: A landscape/townscape with good ability to accommodate change. Change would not lead to a significant loss of features or elements, and there would be no significant loss of character or quality. Development of the type proposed would not be discordant with the landscape/townscape in which it is set.</p> <p>Value: Landscape generally of poor quality with no public access, no designations or recognised cultural significance.</p>

Footnote:

1. A distinction has been drawn between landscape/townscape quality and sensitivity. Quality is as a subjective judgement on perception and value of a landscape/townscape and may be informed by any national, regional or local designations for its quality. Sensitivity relates to the ability of that landscape/townscape to accommodate change.

Table LE 2 LANDSCAPE / TOWNSCAPE MAGNITUDE OF CHANGE

	High	Medium	Low	Negligible	Neutral
Description of the Change predicted	<p>Total loss of or severe damage to key characteristics, features or elements</p>	<p>Partial loss of or damage to key characteristics, features or elements</p>	<p>Minor loss of or alteration to one or more key landscape/townscape characteristics, features or elements</p>	<p>Very minor loss or alteration to one or more key landscape/townscape characteristics, features or elements</p>	<p>No loss or alteration of key landscape/townscape characteristics, features or elements</p>

Table LE 3 LANDSCAPE / TOWNSCAPE EFFECTS

	Substantial	Moderate	Slight	Neutral
Description of the Effect	<p>The proposals are damaging to the landscape/townscape in that they:</p> <ul style="list-style-type: none">• are at variance with the landform, scale and pattern of the landscape/ townscape;• are visually intrusive and would disrupt important views;• are likely to degrade or diminish the integrity of a range of characteristic features and elements and their setting;• will be damaging to a high quality or highly vulnerable landscape/ townscape;• cannot be adequately mitigated.	<p>The proposals are:</p> <ul style="list-style-type: none">• out of scale or at odds with the landscape;• are visually intrusive and will adversely impact on the landscape/townscape;• not possible to fully mitigate;• will have an adverse impact on a landscape/townscape of recognised quality or on vulnerable and important characteristic features or elements.	<p>The proposals:</p> <ul style="list-style-type: none">• do not quite fit the landform and scale of the landscape/ townscape;• will impact on certain views into and across the area;• cannot be completely mitigated for because of the nature of the proposal or the character of the landscape/townscape;• affect an area of recognised landscape/townscape quality.	<p>The proposals:</p> <ul style="list-style-type: none">• complement the scale, landform and pattern of the landscape/townscape;• incorporate measures for mitigation to ensure that the scheme will blend in well with the surrounding landscape/ townscape;• avoid being visually intrusive and adversely affecting the landscape/ townscape;• maintain or improve existing landscape/townscape character.

Footnote:

1. Each level (other than neutral) of change identified can be either regarded as 'beneficial' or 'adverse'.

Table VE 1

VISUAL SENSITIVITY

	High	Medium	Low
Description of the Receptor	<p>Residential properties with predominantly open views from windows, garden or curtilage. Views will normally be from ground and first floors and from two or more windows of rooms in use during the day.</p> <p>Users of Public Rights of Way with predominantly open views in sensitive or unspoilt areas.</p> <p>Predominantly non-motorised users of minor or unclassified roads in the countryside.</p> <p>Visitors to recognised viewpoints or beauty spots.</p> <p>Users of outdoor recreational facilities with predominantly open views where the purpose of that recreation is enjoyment of the countryside - e.g. Country Parks, National Trust or other access land etc.</p>	<p>Residential properties with partial views from windows, garden or curtilage. Views will normally be from first floor windows only, or an oblique view from one ground floor window, or may be partially obscured by garden or other intervening vegetation.</p> <p>Users of Public Rights of Way with restricted views, in less sensitive areas or where there are significant existing intrusive features.</p> <p>Users of outdoor recreational facilities with restricted views or where the purpose of that recreation is incidental to the view e.g. sports fields.</p> <p>Schools and other institutional buildings, and their outdoor areas.</p> <p>Users of minor or unclassified roads in the countryside, whether motorised or not.</p>	<p>People in their place of work.</p> <p>Users of main roads or passengers in public transport on main routes.</p> <p>Users of outdoor recreational facilities with restricted views and where the purpose of that recreation is unrelated to the view e.g. go-karting track.</p>

Table VE 2		VISUAL MAGNITUDE OF CHANGE				
		High	Medium	Low	Negligible	Neutral
Description of the Change predicted	Dominating changes over all or most of the view(s).					
	Major changes over a large proportion of the view(s).					
	Major changes over a small proportion of the view(s).					
	Minor changes over a small proportion of the view(s).					
	No discernable change to the view(s)					

Table VE 3		VISUAL EFFECTS				
		Substantial	Moderate	Slight	Negligible	Neutral
Description of the Effects		The proposals would cause significant damage (or improvement) to a view from a sensitive receptor, or less damage (or improvement) to a view from a more sensitive receptor, and would be an obvious or dominant element in the view.				
		The proposals would cause some damage (or improvement) to a view from a sensitive receptor, or less damage (or improvement) to a view from a more sensitive receptor, and would be a readily discernible element in the view.				
		The proposals would cause limited damage (or improvement) to a view from a sensitive receptor, but would still be a noticeable element within the view, or greater damage (or improvement) to a view from a receptor of lower sensitivity.				
		The proposals would result in a negligible change to the view but would still be discernible.				
		No change in the view.				

Footnote:

1. Each level (other than neutral) of change identified can be either regarded as 'beneficial' or 'adverse'.



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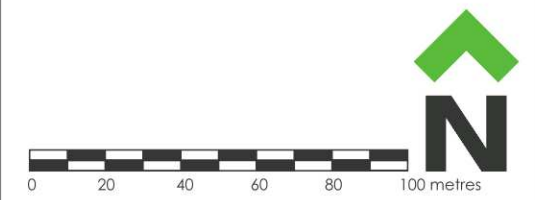
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- Site Boundary: 21.5ha
- Proposed residential area: 12.5ha
- Proposed informal and amenity green space
- Retained open space/farmland
- Movement & Infrastructure**
 - Proposed vehicular access point
 - Existing agricultural access
 - Proposed spine street through development
 - Goring-by-Sea Train Station
 - Existing Rail Line
- Green Infrastructure & Recreation**
 - Existing vegetation
 - Proposed tree and hedgerow planting
 - Proposed locations for Local Equipped Areas for Play (LEAP)
 - Proposed locations for Sustainable Drainage (SuDS) features
 - Proposed recreational routes
 - Proposed new pedestrian/cycle links
 - Existing pedestrian link
 - Existing public footpath
 - Existing water features
 - Overhead electricity cables and pylons

Rev	Date	By	Description
CSA environmental Dixies Barns, High Street, Ashwell, Hertfordshire SG7 5NT 01462 743647 ashwell@csaenvironmental.co.uk csaenvironmental.co.uk			
Project	Goring Station, Goring		
Title	Development Framework Plan		
Client	Persimmon Homes Thames Valley		
Scale	1:2000 @ A2	Drawn	AgB
Date	December 2018	Checked	RR
Drawing No.	CSA/2304/110	Rev	-

Draft Local Plan for Worthing Consultation Document October 2018 Comments Form

**This consultation runs from Wednesday 31st October
to 5pm on Wednesday 12th December 2018**

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

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

Phone: 01273 263000

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

Section A - Contact Details

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Name	Robert Clark	Date	23.11.18
Signed	<i>Robert Clark</i>		

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.

Note: Unless you request otherwise (by putting a cross in the box to the right), all respondents will be added to the Worthing Local Plan consultee database and will be notified at all subsequent stages of Local Plan progression.	No: please don't add me	<input type="checkbox"/>
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In addition, if you would like to subscribe to the Worthing Planning Policy Newsletter (which covers a wide range of Planning Policy issues) then please put a cross in this box:	<input type="checkbox"/>
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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. However, contact details will not be published. Unfortunately, we cannot accept or report confidential or anonymous responses. Further information about how personal information is processed can be found on the Council's website in the Planning Policy Privacy Notice:

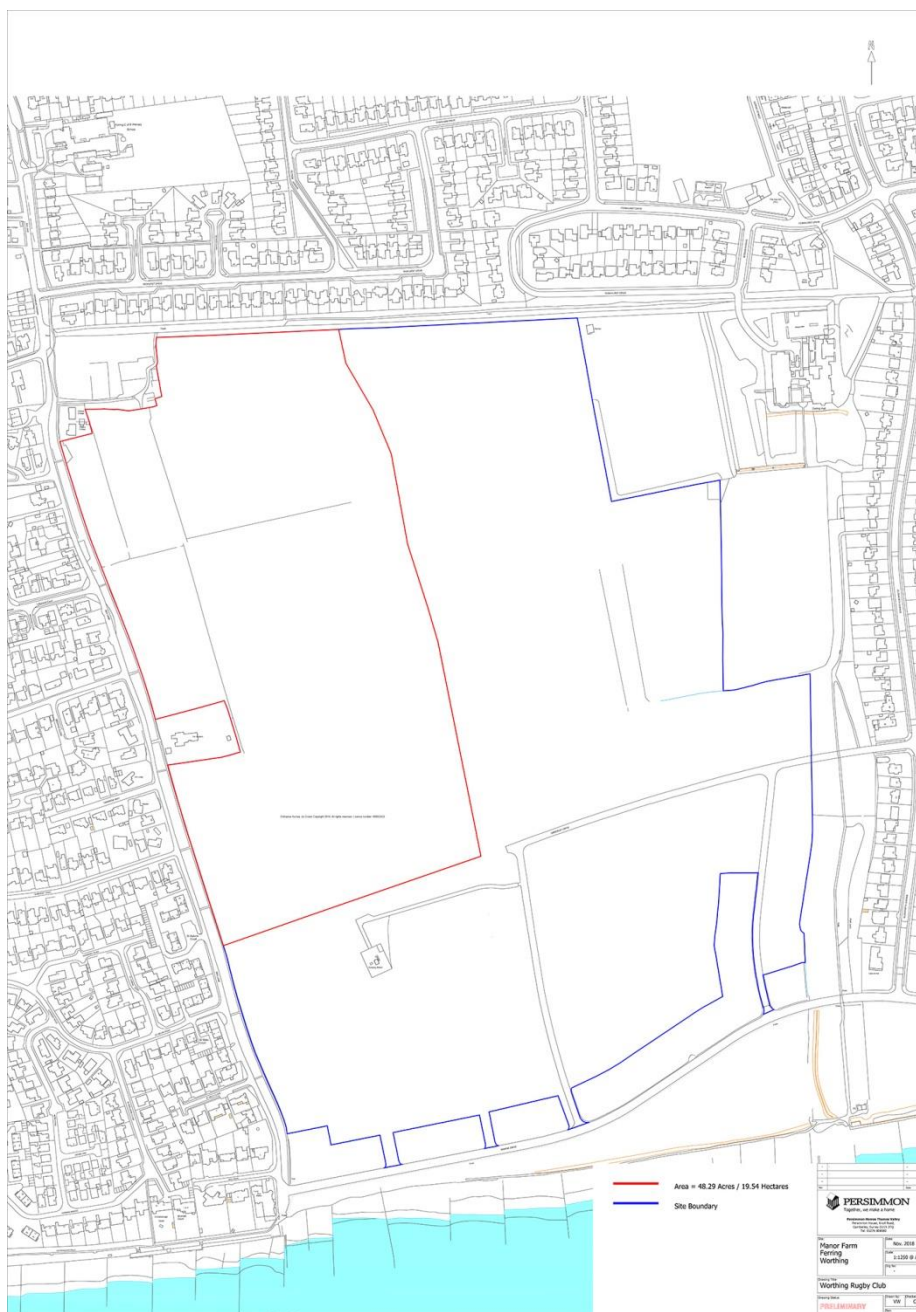
<https://www.adur-worthing.gov.uk/planning-policy/privacy-notice/>

All data will be stored securely in line with the GDPR.

SECTION B – COMMENTS

As set out below, this consultation document is formed of four parts. It would be helpful if you provide your comments under the relevant sections together with relevant policy number, paragraph and page numbers. However, if your comments are more general then your comments can be inserted in the box below.

We begin this response with focus on Persimmon's key interest – Manor Farm, shown below:



GENERAL COMMENTS: set out in the box below.

The Local Plan fails to make adequate provision for new housing and is unsound in terms of the obligations required under the NPPF 2018: achieving sustainable development... meeting the needs of the present and future generations in Worthing. Because the Local Plan's Strategy fails to respond to objectively assessed housing need (OAN), or for the need to include Contingency Sites; instead it over-constrains the residual land outside the National Park with Local Gap/ Local Green Space designations. In that way Persimmon Homes objects to the inclusion of Manor Farm at the interface between Goring and Ferring.

Instead, the Plan should, in an analogous way, adopt the tenets of the NPPF's approach to the Green Belt. At para. 138 LPA's are enjoined... *"When drawing up and reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. **And all options for first accommodating development should be fully examined.**"*

If we take that as an expressed national ethos, for restrictive land designations, it means that the Council should not be shutting down the potential opportunities for development by designating land as a local gap or as a local green space. **That means Persimmon Homes object to their land at Manor Farm being so designated.**

Our objection basis is Local Gap/ Local Green Space designation and linked curtailment in development options leads inexorably to development obligations, especially housing, being unfulfilled – **for present and future generations.** That is a contradiction of Resolution 42/187 of the UN General Assembly.

The severity and deep-seated nature of the WBC problem is such that the Local Plan's constraints-led ethos needs to be turned on its head: **fulfil adequately local needs rather than constrain choice via local gap/ green space designations.** The National Park provides the lungs for the town, thus it is unnecessary to allocate, inter-alia, Manor Farm for quasi open space on a permanent basis via the present putative designation.

In short, Worthing Borough Council does not possess sufficient land for future growth – hence the permanent restriction of development at Manor Farm is unsound. That does not mean that Persimmon is promoting housing on the site: the plan at the beginning of the representations shows the company's land at Manor Farm. The red area is to be conveyed to Worthing Rugby Club and the blue area is to be POS and a nature reserve. **Until such time as WBC is able to satisfy the Borough's development obligations we urge that the permanent designation of Manor Farm as a local gap/ green space is both inappropriate and unsound.**

This box is a fixed size - please continue on separate sheet(s) at the end if necessary

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART I - INTRODUCTION AND CONTEXT

(this 'part' includes characteristics of the borough/issues and challenges and vision & strategic objectives)

Response by Persimmon Homes set out below:

The starting point of the Draft Plan (should be) the NPPF 2018: in fulfilling, inter-alia, local housing needs, by being socially responsible. That means paying full regard to Worthing's OAN.

At its very least, (i) 538 dpa are required to fulfil **household growth**.
In addition to that figure, (ii) 785 dwellings per year are required for **affordable housing**.
Clearly, (iii) there is **market demand** over and above these two figures.

Instead, the Housing Implementation Strategy gives an OAN of 636 dpa, which through a series of WBC calculations is broadened, then massaged backwards to a cap of 778 dpa. Clearly, that amount pays scant regard to the household figure or to the affordable figure. In spite of that deficiency, the Draft Plan then goes on to drop the housing target to 4,182 dwellings in aggregate, or 246 dpa. **This is manifestly unsound in NPPF terms.**

The remedy to this gross under-supply should then be to look to neighbouring LPA's to accept part of Worthing's (unfulfilled) housing burden. But under that heading nothing has been achieved in the across-boundaries dialogue: Adur is 3,107 dwellings short of its own target; and Arun has been able to offer only 81 dpa to offset (cross cooperation) needs. Indeed, Arun District acknowledge it will fail to deliver its own housing target in the first 5 years of their plan period.

In light of that, the Draft Plan needs to begin the process of satisfying its OAN within the Borough and commence making allocations accordingly. **It is untenable to go forward on 246 dpa.**

That is a comment made in the light of para. 35 of the NPPF... "Plans are sound if they are positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed need." **The Plan's intention of accommodating only 33% of Worthing's housing needs is plainly in default of the National Guidance.**

As such, the designation of Manor Farm, right now, in this Draft Plan, as a Local Gap/ Local Green Space is unsound.

PART 2 - SPATIAL STRATEGY

(this 'part' sets out the proposed spatial strategy (what development and where) and the policies to deliver it)

With the NPPF and OAN figures as the necessary anchor to the Plan, the Spatial Strategy needs to commence with Worthing Borough Council's need for a minimum of 12,801 dwellings/ 778dpa **to be fulfilled by land allocations**. Next, the allocations need to be in sustainable locations, where public transport is available. And beyond that remit, the spatial strategy should be biased to large site releases – as being the best opportunity to secure meaningful numbers of affordable housing.

It is entirely unsound for the Plan to proceed on the basis that it provides only 33% of the housing required in the Borough, an overall shortfall of 8,600 dwellings. Moreover, the inadequacy of this shortfall is exacerbated brutally if reference is made to WBC's affordable housing requirement – said, under this sector alone, to be **785 dwellings per annum**.

By any measure, the Spatial Strategy is inadequate; but in its dire response it fails to reflect the inability of neighbouring LPA's to assist, and secondly for Worthing to have opted for a capacity-based approach is deeply flawed. As a large portion of the Borough is in the National Park the remaining non-urban land needs to be freely assessed. The plan-making process should not commence with designation of Local Gap or Green Space designations.

Thus, we object to Persimmon's land at Manor Farm being so designated:

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 3 - DEVELOPMENT SITES

(this 'part' includes details of the proposed future development sites)

Please see our comments under this heading in our parallel submission on Chatsmore Farm, Goring.

PART 4 CORE POLICIES - HOMES AND NEIGHBOURHOODS (Policies CPI – CP6)

No comment.

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 4 CORE POLICIES – SUSTAINABLE COMMUNITIES

(Policies CP7 – CPI0)

No comment.

**PART 4 CORE POLICIES – LOCAL ECONOMY
(Policies CPI1 – CPI4)**

No comment.

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

**PART 4 CORE POLICIES – HISTORIC ENVIRONMENT
(Policies CPI5 – CPI6)**

No comment.

**PART 4 CORE POLICIES – ENVIRONMENT AND CLIMATE CHANGE
(Policies CPI7 – CP23)**

No comment.

This box is a fixed size - please continue on separate sheet(s) at the end if necessary

PART 4 CORE POLICIES – TRANSPORT AND CONNECTIVITY (Policies CP24 – CP25)

We endorse Policy EP24 – Transport and the statement *“WBC will promote and support development that encourages travel by walking, cycling and public transport, and reduces the proportion of journeys made by car.”*

This box will grow to allow you to add extra comments

Additional comments continuation sheet(s) - please mark clearly which section your comments carry on from

Re: Issues and Challenges, Spatial Strategy, Development Capacity, Local Gap, Local Green Space

From the context of 24.1% of the land in the Borough being within the National Park, the Council shows, within the Plan, insufficient regard to the utility of that land to Borough residents: it provides the lungs of the Borough, open space, recreation, etc and enhances local quality of life. Ignoring these “on the doorstep” opportunities means that the Plan is flawed in seeking further park-like opportunities elsewhere.

That process by WBC has led to drawing **Manor Farm** into a no-development designation. For the record, this is private land with no public access. Hence, the Plan’s inference that the local gap/ green space designation of the land consolidates its public utility and access is not accurate.

Nevertheless, Persimmon intends to make a positive response to para. 4.99 of the Draft Plan... “Across Worthing there is a deficiency in the amount of natural/ semi-natural amenity green space.” That is why the Rugby Club and open space plans were touched on earlier in these representations were noted

However, Persimmon **Homes will not accept the Plan’s restrictive green space/ local gap designations for Manor Farm whilst WBC is manifestly unable to satisfy its indigenous development needs.**





Amberley Drive, Ferring

Review of Policy SP6: Local Green Space – Draft Worthing Local Plan

Prepared by
CSA Environmental

on behalf of
Persimmon Homes
Thames Valley

Report No: CSA/4083/02

December 2018

Report Reference	Revision	Date	Prepared by	Approved by	Comments
CSA/4083/02	-	11.12.2018	CA	SG	First Issue



CONTENTS	Page
1.0 Introduction	1
2.0 Landscape Policy Framework	2
3.0 Review of Policy SP6: Goring – Ferring Local Green Space	7
6.0 Conclusion	13

Appendices

Appendix A: Site Location Plan

1.0 INTRODUCTION

- 1.1 CSA Environmental has been instructed by Persimmon Homes Thames Valley to undertake a review of draft Policy SP6: Local Green Spaces of the Draft Worthing Borough Local Plan.
- 1.2 Persimmon Homes Thames Valley have an interest in land at Amberley Drive, Ferring (the 'Site'). The Site occupies an area of farmland indented into the urban areas of Ferring and Worthing. The eastern part of the Site lies within Worthing Borough, whilst the western half is in Arun District. The Site lies within an area described as the Goring – Ferring Gap in the Draft Worthing Borough Local Plan. The land within Arun District is identified as a Gap between Settlements in the Adopted Arun Local Plan. The location of the Site is shown on the Site Location Plan in **Appendix A**.
- 1.3 The Draft Worthing Borough Local Plan identifies that the eastern part of the Site is located in an area identified as Local Green Space in draft Policy SP6. The Local Green Space designation is described in the National Planning Policy Framework ('NPPF') and enables local communities to identify and protect green spaces which are of particular importance to them. The level of protection afforded to areas identified as Local Green Space is equivalent to that afforded by Green Belt.
- 1.4 Persimmon Homes Thames Valley, alongside Worthing Rugby Club, are promoting land within the Goring – Ferring Gap for the relocation of the rugby club. The proposed pitches, stadium and parking areas will be located within the north western part of the gap, entirely within Arun District.
- 1.5 Persimmon Homes Thames Valley are not promoting built development within the land which lies within the Worthing part of the Goring – Ferring Gap. Despite this, they are submitting representations in respect of draft Policy SP6: Local Green Spaces on the grounds that it represents an unduly restrictive and disproportionate level of protection on the land; and that the Site does not meet the criteria for designation.
- 1.6 This review considers the purpose of the draft Local Green Space designation and the degree to which it is appropriate to designate the land at Amberley Drive. It considers local and National planning policy / guidance and the Council's evidence base documents which underpin this designation. In addition, the document considers whether the Site meets the criteria for designation of Local Green Space, as set out in the NPPF.

2.0 PLANNING POLICY FRAMEWORK

National Policy and Guidance

- 2.1 The Local Green Space designation was first identified in the NPPF (NPPF, 2012). Paragraph 99 of the updated NPPF (2018) states:

'The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.'

- 2.2 Paragraph 100 sets out the criteria which must exist in order for a Local Green Space designation to be used. These are:

- a) *'in reasonably close proximity to the community it serves;*
- b) *demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- c) *local in character and is not an extensive tract of land.'*

- 2.3 Paragraph 101 states that policies for managing development in Local Green Space should be consistent with those in Green Belt.

- 2.4 Further guidance on Local Green Space is provided in the Planning Practice Guidance. The guidance on 'Open space, sports and recreation facilities, public rights of way and local green space' states that the Local Green Space designation is a way to provide special protection against development for green areas of particular importance to local communities (Paragraph: 005 Reference IS: 37-005-20140306).

- 2.5 In addition the guidance states how the Local Green Space designation relates to development:

'Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making.' (Paragraph:007 Reference IS: 37-007-20140306)

- 2.6 In respect of the types of green area which can be identified as Local Green Space the guidance states the following:

'The green area will need to meet the criteria set out in paragraph 77 (NB. now paragraph 100 of NPPF 2018) of the National Planning Policy Framework. Whether to designate land is a matter for local discretion. For example, green areas could include land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis.' (Paragraph: 013 Reference ID: 37-013-20140306)

- 2.7 In terms of proximity of Local Green Space to the community it serves, the guidance notes that this will depend on local circumstances but must be reasonably close.

- 2.8 The PPG also provides advice on the size of Local Green Space:

'There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgment will inevitably be needed. However, paragraph 77 (NB. Paragraph 100 in NPPF 2018) of the National Planning Policy Framework is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. Consequently blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name.' (Paragraph: 015 Reference ID: 37-015-20140306)

- 2.9 Paragraph: 016 (Reference ID: 37-016-20140306) notes that there is no minimum size limit.

- 2.10 In terms of public access, the guidance states that although some areas considered for designation as Local Green Space may have unrestricted public access, areas with no public access could be considered, for instance if they are valued for their wildlife, historic significance and / or beauty (Paragraph 017 Reference ID: 37-017-20140306).

Local Policy

- 2.11 Worthing Borough Council has published the Draft Worthing Borough Local Plan (2018). The following emerging policies are relevant to this report.
- 2.12 **Draft Policy SP6: Local Green Space** identifies the land identified as the Goring – Ferring Gap as a Local Green Space. The policy provides the following justification for the designation:

- b) *'The Goring Ferring Gap is designated as Local Green Space because the community value: its historic associations including important views that contribute strongly to a sense of place; wildlife; opportunities for bird-watching, stargazing, and quiet recreation; and the provision of relative tranquility in an otherwise unrelieved urban conurbation.*
- c) *Increased quiet and informal recreation would be compatible with this designation. However, additional formal recreation or structures to support informal recreation could damage the qualities for which the Goring-Ferring Gap is valued. Any proposal would have to demonstrate that it does not conflict with those values.'*

2.13 **Draft Policy SP5: Local Green Gap** also identifies the land in the Goring – Ferring Gap as lying within this designation. The policy states that these areas have been designated in order to retain the separate identities and character of the neighbouring settlements. The policy goes on to state that any development permitted within these areas must not, either individually, or cumulatively, result in the coalescence of these settlements.

2.14 The remainder of the Site to the west lies with Arun District and is covered by adopted **Policy SD SP3: Gaps Between Settlements** which protects the generally open and undeveloped nature of gaps between settlements to prevent coalescence and retain their separate identity, including Worthing to Ferring. It goes on to state that development will only be permitted where it meets the following criteria:

- *'It would not undermine the physical and / or visual separation of settlements;*
- *It would not compromise the integrity of the gap, either individually or cumulatively with other existing or proposed development;*
- *It cannot be located elsewhere; and*
- *It maintains the character of the undeveloped coast; or*
- *If a subsequent DPD or Neighbourhood Plan deems it appropriate through an allocation.'*

Evidence Base Documents

Landscape and Ecology Studies

2.15 Worthing Borough Council commissioned Hankinson Duckett Associates ('HDA') to undertake a landscape and ecology study to inform policy and potential development options in the emerging Local Plan. HDA prepared the following report:

- Landscape and Ecology Study of Greenfield Sites in Worthing Borough, November 2015.

2.16 The HDA document identified the Site as Site 4: Land North East of Amberley Drive. The 2015 study divides the Site into two zones: Zone A comprises the majority of Site 4 and Zone B occupies a smaller parcel in the east of the Site, to the immediate south of Goring Hall Hospital. By following the methodology set out in Section 2, the study considers that Zone A has a Major landscape, visual and ecological sensitivity to development, and is of Substantial landscape, visual and ecological value. By combining these judgements it concludes the Zone A has *negligible* suitability for development. In respect of Zone B, the study considers it to have both a Substantial sensitivity and value, and therefore to have *negligible / low* suitability for development.

Goring Gap Proposed Local Green Space Designations (June, 2018)

2.17 HDA on behalf of the Council, have also undertaken an appraisal of the landscape suitability of the Goring Gap sites for designation as Local Green Space. The appraisal considers the suitability for designation against a number of criteria, as follows:

- Proximity to the community;
- Special qualities and local significance;
- Demonstrably special qualities to local communities;
- Local significance: beauty;
- Local significance: historic significance;
- Local significance: recreational value;
- Local significance: recreational value.
- Local significance: richness in value; and
- Local in character and not an extensive tract of land.

2.18 The appraisal concludes that the Goring Ferring Gap fully meets the NPPF criteria for Local Green Spaces. In respect of the Goring Gap as a whole (which includes both Chatsmore Farm and the Goring-Ferring Gap) the appraisal states the following in respect of their performance against the NPPF criteria:

'Firstly, both parts of the Gap are adjacent to the community they serve. Secondly, they are demonstrably special to the local community and hold particular local significance for not just one, but all, of the examples provided

in the NPPF criteria. Lastly, both sites which form the Gap are well-defined parcels of land and are not extensive tracts or simply blankets of unremarkable open countryside.'

2.19 In respect of the Goring – Ferring Gap the report notes the following:

'The southern, Goring-Ferring Gap site is one of the few remaining stretches of undeveloped coastline within the locality and is widely used by the public for recreation. The site provides an undeveloped setting to the coastline, and despite being surrounded by settlement, is buffered from development by adjacent woodland and tree cover, allowing visual connection between the coastal plain and the South Downs National Park, uninterrupted by views of development.'

2.20 The findings of the appraisal are considered in more detail in the next section.

3.0 REVIEW OF POLICY SP6: GORING – FERRING LOCAL GREEN SPACE

- 3.1 The following section considers the emerging Local Green Space designation in respect of the land at Amberley Drive, which lies within land identified as the Goring – Ferring Gap.
- 3.2 The Draft Worthing Borough Local Plan seeks to provide a strategy for development and change in Worthing in the period up to 2033. Its purpose is to establish a spatial strategy and identify suitable locations for sustainable growth within the Borough. The emerging Local Plan acknowledges that growth in the Borough is very constrained, and at paragraph 1.30 of the emerging plan states:

‘Limited land availability, infrastructure constraints, areas of flood risk, heritage assets and high quality landscapes around the borough means that there is little room for expansion. Put simply, it is the same features we want to protect which, in part, constrain the borough’s ability to grow and develop. The overarching challenge is therefore to balance development and regeneration against the limited physical capacity of Worthing to accommodate it and the need to maintain a good quality of life for new and existing residents.’

- 3.3 To compound matters, the Draft Worthing Borough Local Plan acknowledges that an increasing population and the special qualities of the area create a high demand for housing, in particular it identifies a shortage of affordable homes for younger people and people on low incomes.
- 3.4 The Council confirm that the most up-to-date assessment of the objectively assessed housing need (based on the standard method as set out in national planning guidance and the 2016 household projections published in September 2018) is 12,801 dwellings over the plan period (to 2033). This equates to 753 dwellings per annum across the plan period.
- 3.5 Despite the identified need for housing in the Borough, the Draft Local Plan has only identified an overall development capacity of 4,182 dwellings which can be delivered within the plan period. This represents a shortfall of 8,619 dwellings and equates to an annual housing target of 246 dwellings. The council acknowledge that only 33% of the overall housing need will be met.
- 3.6 The Council’s spatial strategy is therefore grossly inadequate and results in a significant shortfall in the required level of housing to meet the Borough’s needs. Draft Policy SP6 forms a key component of the Council’s proposed spatial strategy.

Draft Policy: SP6 Local Green Spaces

- 3.7 The Council proposes to designate land within the Goring – Ferring Gap as Local Green Space. This is a significant designation and conveys on the land the highest level of protection akin to Green Belt, thus effectively precluding any development unless very special circumstances exist to justify it. Like Green Belt, Local Green Space boundaries can only be designated when a plan is prepared or updated, and should be capable of enduring beyond the plan period. Such a designation therefore carries significant weight.
- 3.8 In addition to the Local Green Space designation, the Council are seeking to designate the land within the Goring – Ferring Gap as a Local Green Gap. This approach is consistent with Arun District who has identified the land within the western part of the Site as a Gap between Settlements. The purpose of the gap designation is to prevent coalescence and maintain the separate identity of Goring and Ferring. Whilst this is a restrictive policy, it does not preclude development which meets the criteria set out in the relevant policies.
- 3.9 The Local Green Space designation would introduce another tier of protection to the land within Worthing Borough. As noted, the designation carries the highest level of protection consistent with Green Belt. Paragraph 143 of the NPPF states ‘inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.’ It is this test of ‘special circumstances’ which would also apply to Local Green Gaps.
- 3.10 In addition, paragraph 99 of the NPPF states that Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period. Again this is consistent with the approach set out in the NPPF in respect of the Green Belt. As a result, any amendment to the Local Green Space boundary can only be considered as a part of a Local Plan review, and only if special circumstances exist.
- 3.11 The Local Green Space designation therefore extends a level of protection to the land at Angmerring Drive which is significantly greater than that afforded by the Local Green Gap policy. This approach is in our view entirely inappropriate and it is inconsistent with the approach adopted by the neighbouring Local Authority in Arun District.
- 3.12 The NPPF sets out the strict criteria which must be met in order to justify designation of land as Local Green Space. This is supported by the PPG which provides further guidance.
- 3.13 The NPPF is explicit that designating land as Local Green Space should be consistent with the local planning of sustainable development and

complement investment in sufficient homes, jobs and other essential services. This is supported by the PPG which states:

'Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making.'

- 3.14 Worthing acknowledges that the Draft Local Plan delivers a significant shortfall in the identified housing needs. The spatial strategy is therefore fundamentally flawed, and the Council should not be considering making Local Green Space designations until such time as the Local Plan is able to identify sufficient housing numbers.
- 3.15 Paragraph 100 of the NPPF identifies the criteria which Local Green Spaces should be assessed against. These criteria are considered in more detail below under the relevant heading. Where applicable, reference is made to the Council's own evidence base documents.

Reasonably Close Proximity to the Community it Serves

- 3.16 There is no specific standard for what constitutes reasonably close, however it would be reasonable to conclude that Local Green Spaces should have good access by foot from the local area they serve. In this case, the Site is located in close proximity to the adjoining residential area. The majority of the Site however is not publically accessible. There is a public bridleway which follows Ilex Way to the north, and Amberley Drive provides access between Marine Drive and the built up area of Goring to the east. There is also public access to the woodland to the east of the gap.
- 3.17 The Council's Local Green Space appraisal of the Goring – Ferring Gap, notes that the land in the Goring – Ferring Gap is well used for recreation, although it does not provide evidence to support this assertion. There are a number of informal walking routes which cross this land, however there is no formal right for public access to the vast majority of the area, save along the public footpaths. The Council also notes that the Site attracts visitors from further afield, however this is clearly irrelevant, as these visitors are not part of the local community and their purpose is unlikely to be to visit the farmland which comprises the majority of this area, although visitors are likely to be attracted to the adjoining shoreline.

Local in Character and a not an Extensive Tract of Land

- 3.18 The NPPF does not indicate what constitutes an extensive tract of land, however the PPG states the Local Green Space designation should not be used to provide a blanket designation of countryside adjacent to settlements,

and should not be used to achieve a new area of Green Belt by another name.

- 3.19 The overall Goring – Ferring Gap is approximately 68ha in size and the area within Worthing Borough is approximately 35ha. This clearly constitutes an extensive tract of land. It comprises open, arable farmland adjacent to existing development and an area of playing fields in proximity to Goring Hall. In terms of character, the majority of this area cannot reasonably be described as local, given that it is farmland with limited public access on the edge of the settlement, although the playing fields do relate more to the community that they serve. The farmland is adjoined by housing, but does not relate to the local community, like for instance a village green or an area of public open space would do. As suggested by the PPG, it is not the function of the Local Green Space designation to provide a blanket designation across a large area of open land, and therefore does not apply to the Site in this respect.
- 3.20 The Site's key function is to provide a visual and physical 'break' between the adjoining settlements of Ferring and Goring-on-Sea. This is supported by the Gaps between Settlements policy within Arun, and the draft Local Green Gap policy proposed by Worthing. The additional protection afforded by the Local Green Space designation would be tantamount to creating a new area of Green Belt in order to maintain this area permanently open, and as noted in the PPG, this is not the purpose of the policy.

Demonstrably Special to the Local Community

- 3.21 The NPPF states that in order to qualify as Local Green Space, an area must be demonstrably special to the Local Community and hold a particular local significance. It cites a number of examples, which are beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of wildlife. These factors are considered in more detail below.
- 3.22 In terms of scenic beauty, the Site has no local or national designation for landscape quality. It comprises, in the main, of large scale, open farmland. The mature Holm Oaks which border Ilex Avenue, the woodland in the vicinity of Goring Hall and alongside the eastern boundary are notable features. The undeveloped nature of the coastline to the south also contributes to the character and quality of this area. Notwithstanding this, the farmland and playing fields which comprises the vast majority of the proposed Local Green Space cannot reasonably be described as being of high landscape quality or being scenically beautiful.
- 3.23 The Council's appraisal notes that the Site provides visual connectivity between the undeveloped coastline and the National Park, including Highdown Hill, to the North. This relationship is a result of the open nature of

the Site, and whilst this characteristic permits inter-visibility between the coast and the designated landscape, it does not convey on the Site additional scenic qualities.

- 3.24 In terms of the Site's historic significance, the Site contains no listed heritage assets. The Council's appraisal states that the Site is associated with the Conservation Area at Goring Hall which includes Ilex Avenue which extends alongside the northern edge of the Site. It also notes the historic contribution of the woodland at the Plantation which is associated with Goring Hall. The Council's appraisal notes that the site provides a setting for the Grade II Goring Hall and that there are views across the fields between the hall and the undeveloped coast. These conclusions appear to be based on the assessment undertaken by the Goring Residents Association. Whilst this assessment identifies the presence of these historic assets and describes their attributes, it makes no objective assessment of the role that the Site plays in their setting. It is therefore not a robust basis to make any judgement in respect of the Site's historic significance.
- 3.25 The Site is in private ownership and the majority of the Site is not publically accessible. Whilst there is evidence of dog walkers using the Site, there is no formal right of access. There are playing fields located to the north east of this area. The Site is therefore of limited recreational value. The Council's appraisal notes that the recreational value of the Site is particularly important given the deficit of natural / semi-natural green space and amenity space in the Borough. This is misleading. The Site has limited access and makes no contribution to the Borough's open space in its current form.
- 3.26 In terms of tranquillity, the Site is bordered by housing and roads, although to the north and east these are contained by established vegetation. Given the size of this land parcel, its relationship to the adjoining coastline and its undeveloped nature, it will have some tranquil qualities which will likely be valued by residents of the surrounding built up area. Despite this, its proximity to housing and surrounding infrastructure, including lighting, means that these qualities should not be exaggerated. The Council's appraisal notes that this area has moderate tranquillity, however does not appear to have any factual basis for this assertion.
- 3.27 The Site comprises predominantly arable farmland which is of limited wildlife value, although the woodland which borders this area has higher value. The Landscape and Ecology Study undertaken by HDA confirms that the linear vegetative features have low local wildlife value, whilst the woodland is of high wildlife value. The ecology summary also confirms that the remainder of the Site is dominated by habitats of negligible interest.
- 3.28 The Council's Local Green Space appraisal, also undertaken by HDA, notes that the previous study identified the majority of the Site's ecological features

are of moderate to high ecological value, however fails to mention that the majority of this area is farmland of negligible value. In addition, the appraisal states that the significance of the Site's wildlife richness to the local community is highlighted by the 113 responses to the issues and options consultation. Whilst this may highlight that some local people identify that the Site has wildlife value, it is not a robust justification to suggest that it performs this function to any notable degree that it should be designated as Local Green Space.

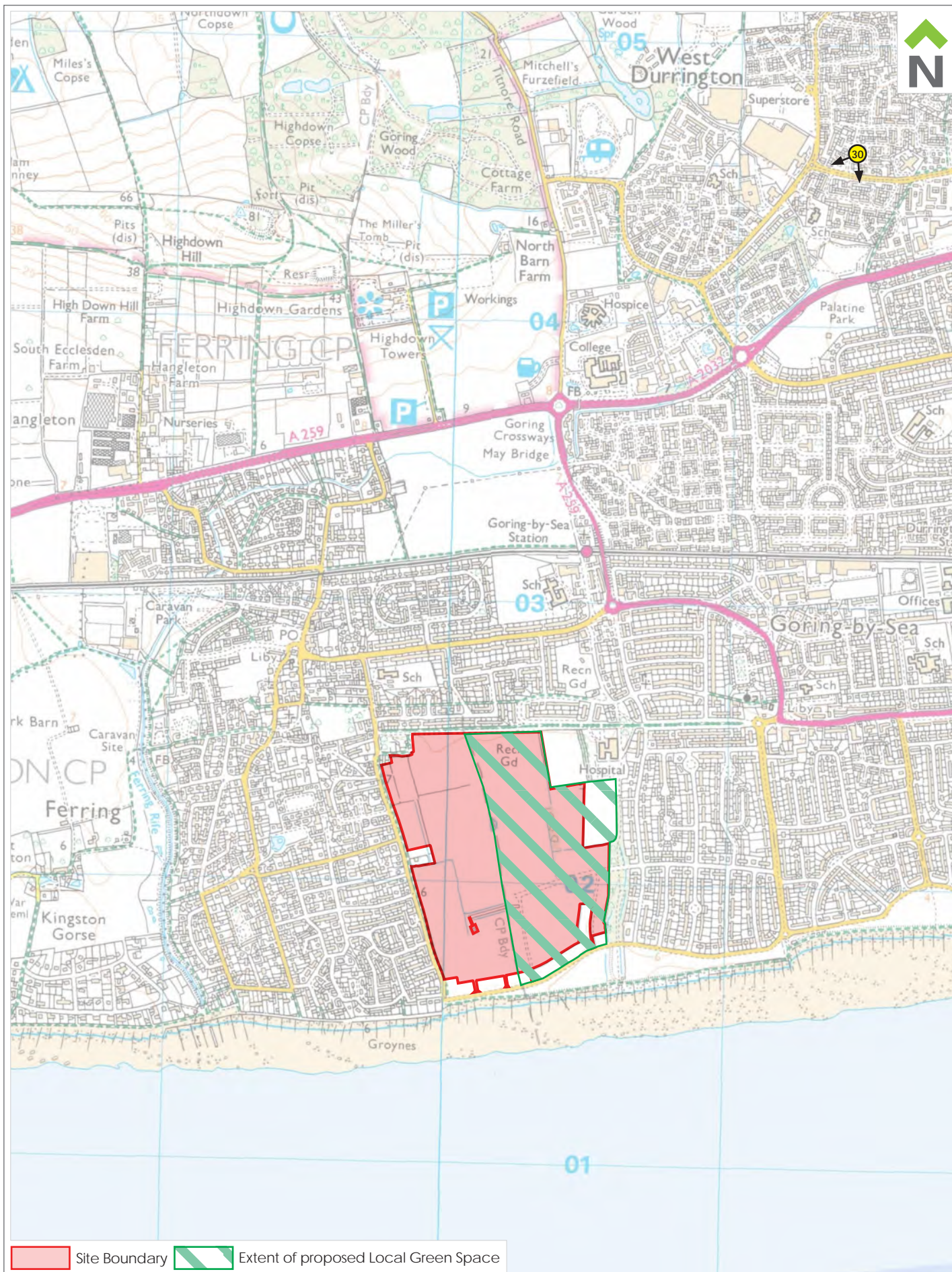
- 3.29 Our assessment of the Local Green Space designation in respect of the Goring – Ferring Gap has identified that it fails to meet the vast majority of the qualifying criteria set out in the NPPF. Given the significance of this designation and its restrictive nature, akin to Green Belt, we strongly feel that there is no justification for designating this Site as Local Green Space.

4.0 CONCLUSION

- 4.1 The Draft Worthing Borough Local Plan has identified an overall development capacity within the Borough of 4,182 new homes during the plan period. This represents a shortfall of 66% based on the objectively assessed housing need of 12,801. The Council's spatial strategy is therefore grossly inadequate and results in a significant shortfall in the required level of housing to meet the Borough's needs. Draft Policy SP6 forms a key component of the Council's proposed spatial strategy.
- 4.2 The NPPF is explicit that designating land as Local Green Space should be consistent with the local planning of sustainable development and should complement investment in sufficient homes, jobs and other essential services. Given the gross inadequacy of the Council's spatial strategy, the Council's decision to designate land in the Goring – Ferring Gap as Local Green Space, is contrary to the objectives of National planning policy.
- 4.3 The Council proposes to designate land within the Goring – Ferring Gap as Local Green Space. This is a significant designation and conveys on the land the highest level of protection akin to Green Belt, thus effectively precluding any development unless very special circumstances exist to justify it.
- 4.4 In addition to the Local Green Space designation, the Council are seeking to designate the land within the Goring – Ferring Gap as a Local Green Gap. This approach is consistent with Arun District who has identified the land within the western part of the Site as a Gap between Settlements. Whilst this is a restrictive policy, it does not preclude development which meets the criteria set out in the relevant policies.
- 4.5 The Local Green Space designation would introduce another tier of protection to the land within Worthing Borough. The Local Green Space designation therefore extends a level of protection to the land at Angmerring Drive which is significantly greater than that afforded by the Local Green Gap policy. This approach is in our view entirely inappropriate and unduly restrictive. It is also inconsistent with the approach adopted by the neighbouring Authority in Arun District.
- 4.6 CSA has assessed the Site against the criteria for designation as a Local Green Space as set out in the NPPF. Our assessment found that designation would be wholly inappropriate, given that the Site is an extensive tract of farmland and does not have qualities which are demonstrably special and of particular local significance.

Appendix A

Site Location Plan



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	Drawing Title	Site Location Plan	Scale @ A4	NTS	Drawn	SRW
	Client	Persimmon Homes Thames Valley	Date	December 2018	Checked	LG



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Draft Local Plan for Worthing Consultation Document October 2018 Comments Form

**This consultation runs from Wednesday 31st October
to 5pm on Wednesday 12th December 2018**

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

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

Phone: 01273 263000

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

Section A - Contact Details

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Name	Robert Clark	Date	10.12.18
Signed	<i>Robert Clark</i>		

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SECTION B – COMMENTS

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We begin this response with focus on Persimmon's key interest – Upper Brighton Road

GENERAL COMMENTS: set out in the box below.

Since the publication of the White paper, 'Fixing Our Broken Housing Market' central Government has been adamant that both national and local housing production has been far below that needed both as measured demographically and as measured through market signals – largely in terms of affordability ratio's. The political, social and planning importance of increasing housing output from the very low levels currently being achieved has permeated every facet of advice issued by DCLG and Ministerial speeches.

The overarching context for the Local Plan is the NPPF (March 2012) which highlights the need to boost significantly the supply of housing whilst the NPPF (July 2018) strengthens further the importance which Central Government attaches to increasing housing production since it was one of the primary reasons for reviewing the document with Paragraph 59 of the NPPF stating "*to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay*". The draft Local Plan is contrary to this advice.

The Local Plan fails to make adequate provision for new housing and is unsound in terms of the obligations required under the NPPF 2018: *achieving sustainable development... meeting the needs of the present and future generations in Worthing.* Because the Local Plan's Strategy fails to respond to objectively assessed housing need (OAN), the consequence is that there is only 2.9 years' supply of housing land; and, of that quantum, many of the Plan's brownfield scheduled sites are not readily deliverable.

It is for these reasons that Persimmon Homes Thames Valley welcome and support the proposed Site Allocation A3: Land at Upper Brighton Road. Persimmon Homes Thames Valley has been in regular dialogue with WBC about the Strategic site A3 on the north-eastern flank of Worthing. The Draft Local Plan's allocation for 123 units is **fully** supported.

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 1 - INTRODUCTION AND CONTEXT

(this 'part' includes characteristics of the borough/issues and challenges and vision & strategic objectives)

Response by Persimmon Homes set out below:

The starting point of the Draft Plan (should be) the NPPF 2018: in fulfilling, inter-alia, local housing needs, by being socially responsible. That means paying full regard to Worthing's OAN.

At its very least, (i) 538 dpa are required to fulfil **household growth**. In addition to that figure, (ii) 785 dwellings per year are required for **affordable housing**. Clearly, (iii) there is market demand over and above these two figures.

Instead, the Housing Implementation Strategy gives an OAN of 636 dpa, which through a series of WBC calculations is broadened, then massaged to a cap of 778 dpa. Clearly, that amount pays scant regard to the household figure or to the affordable figure. In spite of that deficiency, the Draft Plan then goes on to drop the housing target to 4,182 dwellings in aggregate, or 246 dpa. **This is manifestly unsound in NPPF terms.**

In light of that, the Draft Plan needs to begin the process of satisfying its OAN within the Borough and commence making allocations accordingly. **It is untenable to go forward on 246 dpa.**

That is a comment made in the light of para. 35 of the NPPF... "Plans are sound if they are positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed need." **The Plan's intention of accommodating only 33% of Worthing's housing needs is plainly in default of the National Guidance.**

PART 2 - SPATIAL STRATEGY

(this 'part' sets out the proposed spatial strategy (what development and where) and the policies to deliver it)

With the NPPF and OAN figures as the necessary anchor to the Plan, the Spatial Strategy needs to commence with Worthing Borough Council's need for a minimum of 12,801 dwellings/ 778dpa **to be fulfilled by land allocations**. Next, the allocations need to be in sustainable locations, where public transport is available. And beyond that remit, the spatial strategy should be biased to deliverable greenfield site releases – as being the best opportunity to secure meaningful numbers of affordable housing.

It is entirely unsound for the Plan to proceed on the basis that it provides only 33% of the housing required in the Borough, an overall shortfall of 8,600 dwellings. Moreover, the inadequacy of this shortfall is exacerbated brutally if reference is made to WBC's affordable housing requirement – said to be **785 dwellings per annum**.

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PART 3 - DEVELOPMENT SITES

(this 'part' includes details of the proposed future development sites)

The Governments emphasis is clearly moving toward 'deliverability' and the Council should provide clear evidence that its proposed housing sites can start to deliver within 5 years. It is Persimmon Homes view that the Councils housing strategy cannot demonstrate delivery and the delivery rates will be significantly slower than anticipated with the infrastructure, land, viability and build complexities of the brownfield sites proposed. Based on Persimmon Homes current experience, this is inevitable. Moreover, there is a genuine paucity of badly needed family housing proposed over the plan period which total some 248 units on allocated sites.

It is for this reason that Persimmon Homes fully endorse the allocation of the greenfield site identified as A3: Land at Upper Brighton Road. Within the prescribed area the Company has control of the 7.5ha parcel, located off Upper Brighton Road. There are no legal, ownership or technical issues that will prevent the development. The site is capable of 123 units overall; situated adjoining the Bramber Primary School. It is a logical rounding off of the settlement edge and is a sustainable location for development.

We envisage development implementation and completion within a 2-3 year timescale. Our technical study findings reveal no constraints to the site's development. And in conjunction with the Sompting Estate, additional footpath improvements are proposed along the south side of West Street/Upper Brighton Road. There is scope to accommodate the Council's wish for additional tree planting along boundaries and beyond (the land to the east is owned by the Sompting Estate) to assimilate development into the landscape.

PART 4 CORE POLICIES - HOMES AND NEIGHBOURHOODS **(Policies CPI – CP6)**

No comment.

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

**PART 4 CORE POLICIES – SUSTAINABLE COMMUNITIES
(Policies CP7 – CPI0)**

No comment.

PART 4 CORE POLICIES – LOCAL ECONOMY

(Policies CPI1 – CPI4)

No comment.

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

**PART 4 CORE POLICIES – HISTORIC ENVIRONMENT
(Policies CPI5 – CPI6)**

No comment.

**PART 4 CORE POLICIES – ENVIRONMENT AND CLIMATE CHANGE
(Policies CP17 – CP23)**

No comment.

This box is a fixed size - please continue on separate sheet(s) at the end if necessary

**PART 4 CORE POLICIES – TRANSPORT AND CONNECTIVITY
(Policies CP24 – CP25)**

No comment

This box will grow to allow you to add extra comments

**Additional comments continuation sheet(s) -
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Signed	Joseph Pearson		

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GENERAL COMMENTS

Housing supply – We are concerned that the Council has prematurely abandoned its duty to meet the needs of the town and find creative solutions to meet what is obviously a challenging but not insurmountable task. The Local Plan states that it was “very clear at an early stage that there was no prospect of all of Worthing’s identified housing needs being met within the existing Built Up Area Boundary”. The reasoning for this is a selection of constraints identified in 2.25 but these are not discussed in any detail.

The Council have outright rejected a ‘need led approach’ to their housing strategy for very vague reasons within the Sustainability Appraisal. This is entirely inappropriate as the NPPF requires that the Council take a needs-led approach to plan preparation. The Council has not undertaken any assessment of the impacts of not meeting these needs, nor has it shown any element of understanding the detailed impacts. The strategy is instead built on known and available sites only – with the development yield reduced for these sites according to other priorities. This completely ignores the serious sustainability impacts of failing to provide required housing to meet local needs (including worsening affordability, reducing access to housing, increased commuting from other areas to jobs within the town) and the positive sustainability benefits of meeting those needs including the social benefits, potential job creation, town centre regeneration and other positives.

The assessment scores a needs-led approach negatively in terms of objectives such as communities and the economy when increased residential densities and avoiding worsening affordability have clear and widespread sustainability benefits. Many other negative impacts are entirely assumed with no apparent consideration of the possible ways these impacts could be mitigated against and/or avoided altogether. The sustainability appraisal falls woefully short in this respect and other decisions made within the document have further detrimental results on the provision of housing within Worthing. For example, the objective of promoting an effective use of land inexplicably leads to a preferred option to adopt minimum space standards with no consideration of densities or making effective use of land at all.

Continued below...

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PART 1 - INTRODUCTION AND CONTEXT

(this 'part' includes characteristics of the borough/issues and challenges and vision & strategic objectives)

PART 2 - SPATIAL STRATEGY

(this 'part' sets out the proposed spatial strategy (what development and where) and the policies to deliver it)

Policy SPI is unnecessary and duplicates national policy that may well change over time – which could create future confusion for those using the document. The examining Inspector advised the deletion of a similar policy within the Mid Sussex District Plan. Policy SP2 refers to densities relating well to the surrounding area. The Council should undertake more detailed work identifying which areas would be sensitive to higher density developments and should provide explicit policy support for increased densities in other areas given the significant need for additional housing within the town.

The housing provision identified within the Worthing Local Plan falls woefully short of the identified local housing needs for the area and will have significant adverse impacts. We feel that the Council has neglected its duty to identify an appropriate strategy to meet the needs of its residents. The capacity-based approach described within the Local Plan is not justified, effective or positively prepared and Council clearly needs to develop more creative solutions for meeting identified needs over the Plan period. In this respect the draft document fails to provide a useful or effective plan for the local area.

The Local Plan provides blanket protection for countryside pockets that were not included within the National Park. The justification for this is that the borough contains limited countryside and therefore these areas should be protected, ignoring that the entire northern boundary of the borough forms part of the South Downs National Park – a 1,627 km² area of countryside that will be protected in perpetuity. In this context the protection of countryside areas within the Local Plan lacks justification, existing rural uses can easily be accommodated in neighbouring authority areas should other uses be proposed on these areas of land. SP4 should not require countryside uses as no particular need for these uses within Worthing has been demonstrated.

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 3 - DEVELOPMENT SITES

(this 'part' includes details of the proposed future development sites)

Whilst we have no comments on specific sites the overall approach to addressing housing needs appears to be solely site-based and more consideration should be given to Borough-wide policies which would encourage residential redevelopments and intensification in appropriate locations on both smaller sites and as-yet-unidentified development sites.

PART 4 CORE POLICIES - HOMES AND NEIGHBOURHOODS (Policies CPI – CP6)

We generally support Policy CPI, however the requirement for residential developments to meet a higher standard of accessibility (M4(2)) is not justified and will inevitably impact upon viability of some residential developments. There is no reason why the existing standards required under Part M cannot provide accessible homes that meet the requirements of most residents and any requirement to meet a higher standard of accessibility should reflect the actual evidenced need for this more onerous requirement. This same issue was addressed in the examination of the Mid Sussex District Plan which suggests that no more than 20% of dwellings should be required to meet M4(2), although we have not seen any evidence for Worthing that suggests a similar requirement is justified. Similarly, the requirement for 10% of new build dwellings to meet M4(3) requirements appears to be a high proportion in comparison to need and we have not seen evidence to justify these requirements.

Policy CP2 appropriately seeks to raise densities however whilst the accessibility of the site (see (a)(ii)) is a relevant wider consideration for residential applications, it should have no bearing on the density of the development once the acceptability of the principle of development has been established. It is our opinion that (ii) should be deleted.

The requirement for new developments to meet national space standards is not justified and will negatively impact upon deliverability and viability when the Council is clearly struggling to meet identified needs. Where all new dwellings meet higher standards than those found in some existing residential units (and new housing provision falls significantly short of demand) these new dwellings will remain unaffordable to those most in need of new housing. The higher quality developments would only be enjoyed by those who can afford to pay a premium for them whilst poorer households are concealed, overcrowded or homeless.

Continued...

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 4 CORE POLICIES – SUSTAINABLE COMMUNITIES
(Policies CP7 – CP10)

PART 4 CORE POLICIES – LOCAL ECONOMY
(Policies CP11 – CP14)

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 4 CORE POLICIES – HISTORIC ENVIRONMENT (Policies CPI5 – CPI6)

Policy CPI5 does not appear to operate as a planning policy and instead sets out the wider objectives and strategy that should form supporting text to Policy CPI6. The content of Policy CPI5 provides no useful basis for the determination of planning applications and should not be shown as a policy at all.

Policy CPI6 is one of the longest policies in the Local Plan and duplicates a significant amount of existing national policy. Careful consideration should be given to the need for much of the text in this policy and it should be condensed so that its implications are more easily understandable for readers.

PART 4 CORE POLICIES – ENVIRONMENT AND CLIMATE CHANGE (Policies CPI7 – CP23)

As with other policies, Policy CPI7 introduces significant additional requirements for new residential dwellings that have not been justified and will constrain housing delivery both in isolation and cumulatively with other policies. The priority of the Local Plan has to be meeting the identified housing needs as the sustainability implications of not doing so are dire and the moderate benefits that may be derived from these policies requirements cannot undermine this more important priority in a borough that already has one of the worst affordability ratios in the country.

The requirement for Flood Risk Assessments on all planning applications in flood zones 2 and 3 is potentially excessive and this requirement should only apply to developments where there are likely to be significant implications from flood risk (or on flood risk elsewhere).

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**PART 4 CORE POLICIES – TRANSPORT AND CONNECTIVITY
(Policies CP24 – CP25)**

This box will grow to allow you to add extra comments

**Additional comments continuation sheet(s) -
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Cont. (General Comments)...

A Centre for Cities study referred to within the Local Plan identifies that Worthing already has the 8th worst affordability ratio in the country and the significant underprovision of housing (compared to need) proposed in the Local Plan will significantly worsen this position. The severity of this and the wider impacts on important areas such as quality of life and homelessness does not appear to have been grasped by the Council and in many cases the overall policy approach serves to further restrict housing delivery and exacerbates these serious issues and challenges facing the town. It is imperative that the Council seeks to address this issue over the next 15 years.

For example, the sustainability appraisal under Housing Mix and Quality recommends a policy approach that will place further requirements on housing developers without any understanding of the viability impacts or potential impacts on delivery rates. These requirements should only be imposed where there is a reasonable viability case that they will not adversely impact upon housing delivery and there is no reason why existing building regulations would not continue to provide acceptable housing conditions.

The success of Worthing Town Centre would be greatly improved through a housing strategy that intentionally seeks to raise densities within walking distances of the city centre and services. There are numerous sites (both promoted and not yet promoted for development) that are ripe for redevelopment delivering significantly increased densities and building heights. This would be a logical first-step to meeting the urgent and pressing housing needs of the town. Failure to deliver housing and meet identified needs will worsen demand and affordability and force local residents out of the area. A creative and aspirational strategy to meet these needs will have major benefits for the local economy and social sustainability benefits. This alternative, and any other reasonable options have not even been identified within the Sustainability Appraisal, let alone assessed in the detail that should be expected of the local planning authority.

The Council has also scoped out the possibility of reclaiming land from the sea but have rejected this at an early stage as it “would have little or no relation to the existing urban form”. This is an understandable implication of any land reclamation project (as the existing urban form hasn’t relied upon this form of development) but doesn’t provide a compelling reason not to proceed or preclude this form of development in the future. The Council’s failure to revisit this option since 2007 in any form is disappointing, particularly in the context of a wider failure to identify appropriate solutions to the present housing challenge.

The Borough Council should identify at least one broad location (the town centre) and an aspirational but achievable housing target within this area and should begin work on an Area Action Plan to deliver this level of new housing over the Plan period. The strategy for this area should be built on delivering additional residential development by raising densities, supporting increased building heights within that area and regenerating older and less efficient areas of land within the town centre area. Careful consideration should be given to the necessity of any policies that introduce additional requirements on housebuilders in the town and may make housing schemes unviable or contribute to viability issues that may restrict housing supply (both in current market conditions and in possible scenarios where market conditions may worsen over the plan period).

Continued... Part 4 (CP2)

If the requirement for all new residential developments to meet minimum space standards further constrains delivery in any way then the intention of the Council to improve the quality of accommodation for residents will have the unintended implications of worsening conditions for other households by increasing unaffordability and failing to provide the additional homes that are clearly needed. Such a policy cannot be justified and a revised version of CP2 should instead seek to protect against particularly low-quality developments whilst still providing flexibility for increased provision and more intuitive higher density

solutions where these can be provided. The minimum space standards introduce a further requirement that will constrain delivery and impact upon viability to the detriment of the wider sustainability objectives of the Local Plan and national policies.

The Council's external space standards will have a similar impact upon densities and development viability and in light of the significant under provision of housing proposed in the Local Plan cannot be justified until housing delivery matches the objectively assessed housing needs of the borough.

The Council has not appropriately assessed the implications of this policy approach through their sustainability appraisal or justified this requirement. National technical housing standards are clear that these standards should only be applied where they are clearly justified through evidence. All modern developments are required to meet standards of quality set out in building regulations but under provision of housing over the plan period will inevitably increase overcrowding and homelessness, impacting poor households and those in lower quality existing dwellings the most.

We support the stepped approach to affordable housing however the current thresholds also disincentivise developers from bringing forward developments of 15 or 16 units as they would deliver the same number of (profit-making) market units as a 14-home scheme. An intermediate threshold of 25% for developments of 15 and 16 homes would improve both commercial profitability and delivery on appropriate sites.

Similarly, the policy should refer to net increases in residential units and not gross figures as affordable housing provision may be undermined on viability grounds where gross figures are used.

It is not clear from the wording of CP3 how decimal figures will be rounded up or down and a simple table showing the equivalent no. of units expected for developments of different sizes would provide important clarity for developers.

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	Darren Gooch
Organisation	Adur & Worthing Councils

General comments

With reference to water quality within the Draft Local Plan I would just like the following corrected:

"4.270...*The bathing water is classed as good...*" Please change to '*...The bathing water is classified as sufficient...*' (as of November 2018).

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Section A - Contact Details

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Last name	Cooper		
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Address line 2			
Town	Worthing		
Postcode	BN11 5JR	Telephone	07914038689
Email address			

Name	Rebecca Cooper	Date	12.9.18
Signed			

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GENERAL COMMENTS

This Local Plan is welcome and much needed for the future development of Worthing. It is hoped that this Local Plan will provide strong guidelines for developers and clear strategic direction for investment in the town over the next 10 years.

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PART I - INTRODUCTION AND CONTEXT

(this 'part' includes characteristics of the borough/issues and challenges and vision & strategic objectives)

PART 2 - SPATIAL STRATEGY

(this 'part' sets out the proposed spatial strategy (what development and where) and the policies to deliver it)

Given the high requirement for housing in the area, and the low availability of land, serious consideration should be given to increasing density, perhaps in a designated area of the town. There are many good examples of high quality, innovative density building around the country that enhance the environment and help communities to thrive.

All development (including the currently exempt smaller developments) should be subject to an affordable housing contribution in Worthing. Given the limitations of land availability, many of the developments coming forward are likely to be smaller, and we need to ensure that the housing mix in the Borough is reflective of the housing requirements of our population.

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PART 3 - DEVELOPMENT SITES

(this 'part' includes details of the proposed future development sites)

I am pleased to see that Worthing Leisure Centre is marked as development site. I would fully endorse this redevelopment, particularly the inclusion of a swimming pool – there is high demand for this facility in the Borough, and Splashpoint is over-subscribed.

Is it possible to include the Lido as a development site? I think that this is an area of great potential that is currently underutilised. Ideas such as reopening the Lido would greatly enhance the seafront.


PART 4 CORE POLICIES - HOMES AND NEIGHBOURHOODS (Policies CPI – CP6)

Please see notes in Part 2 above. Noted that in this policy a contribution of 20% would be sought for 10-14 dwellings

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PART 4 CORE POLICIES – SUSTAINABLE COMMUNITIES
(Policies CP7 – CP10)

PART 4 CORE POLICIES – LOCAL ECONOMY
(Policies CP11 – CP14)



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PART 4 CORE POLICIES – HISTORIC ENVIRONMENT (Policies CPI5 – CPI6)

[illegible]

**PART 4 CORE POLICIES – ENVIRONMENT AND CLIMATE CHANGE
(Policies CP17 – CP23)**

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**PART 4 CORE POLICIES – TRANSPORT AND CONNECTIVITY
(Policies CP24 – CP25)**

This is an essential part of the local plan and is tied in with the health of our population, the strategic planning direction of the town and our approach to environmental sustainability. The local plan must use whatever power/influence it has to move Worthing in the direction of a cycling and walking friendly Coastal town. Worthing is a flat urban conurbation, with much of the traffic in the town consisting of local residents moving from one location to another. Local plan policies should prioritise the development of cycling paths and walkways with any new developments. It should also join public realm, leisure, work and transport hubs with cycle and walkways. Public transport should also be prioritised – bus routes should be remapped with the development of the town, linking up key sites as with cycle and walkways.

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Name	Michael Wood	Date	11/12/2018
Signed			

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PART 2 - SPATIAL STRATEGY

(this 'part' sets out the proposed spatial strategy (what development and where) and the policies to deliver it)

Given the substantial shortfall between the housing target and objectively assessed needs it is disappointing that the spatial strategy does not provide a greater emphasis on optimising the output of the Borough's brownfield land. We, therefore, recommend amending the following text:

“Development should make efficient use of previously developed land but the density of development should be appropriate for its proposed use and also relate well to the surrounding uses and the character of the area”

With:

“Development proposals will be required to make the most efficient use of previously developed land taking into account the proposed uses, surrounding uses and the character of the area”

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 3 - DEVELOPMENT SITES

(this 'part' includes details of the proposed future development sites)

We object to the significant shortfall between the proposed housing target and identified housing needs. The draft plan is not positively prepared as it fails to address the council's pressing housing requirements. The 2016 SHMA identifies an objectively assessed housing need (OAN) of 753 dwellings per annum but the plan provides a minimum housing target of just 246 dwellings per annum, a shortfall of 507 homes every year against what is needed.

The picture is even worse if compared to the NPPF standard methodology local housing need figure which suggests a housing need of 865 dwellings per annum based on the 2014-based projections.

We note the supporting text suggests that this unmet need may be met through sub-regional planning. However, the text acknowledges that the boroughs involved within the Greater Brighton Strategic Planning Board are working on developing a "statement" that would deliver for the sub-region between 2030-2050. This is far too late, the council should be working to address how it can meet its housing needs now.

We note that the development sites identified have been informed by the SHLAA. We have no comments on the identified sites but do believe that a greater number of potential development sites should have been considered before the council concludes that it cannot provide enough housing to meet its identified needs. The SHLAA methodology has not changed since 2009 and there is scope for the council to consider a revised methodology and, therefore, additional sites (whether promoted or not) to help meet with its housing needs.

Our clients own the Montague Shopping Centre and are looking at options for optimising the site to provide additional floorspace, including potentially residential accommodation. It should, therefore, be considered within the SHLAA as a potential development opportunity site. We anticipate holding further discussions with the council about the potential of the site in 2019.

Taking into account the above, we recommend that the housing target is updated so that it aspires to meet the full objectively assessed housing need. We set out some suggestive text below:

"The council will work with all parties to deliver as much housing as possible within the borough with an aspiration to meet the 865 dwellings per annum identified local housing need. We will do this by engaging positively with landowners and developers to ensure all potential development sites are supported where they make efficient use of land and are in compliance with the rest of the development plan"

PART 4 CORE POLICIES - HOMES AND NEIGHBOURHOODS (Policies CP1 – CP6)

CP1 – Housing Mix

In regards to the first criterion, the policy as drafted should be amended to acknowledge that appropriate housing mix within developments will need to take into account site specific circumstances and the type of development, as well as the evidence base on need and demand.

Criterion C requires all residential developments to achieve M4(2) Building Regulations. It is not clear how this policy requirement is justified by the evidence base nor what impacts this would have on the viability of development schemes. It is unlikely that *all* new housing in the borough will need to be constructed to such standards and there may be several instances where this would neither be practical, feasible or viable.

CP2 – Density

Given the challenges the council faces in delivering its housing needs the policy as drafted is not strong enough in promoting higher-density development on sites, particularly within those areas identified within criterion C. The text recommending densities “far higher than 35 dwellings per hectare” is positive but is then qualified somewhat by the following sentence which suggests that schemes should be “in excess of 50 dwellings per hectare”. This raises the question as to how close to 50 dwellings per hectare the council would be appropriate in this context. We would, therefore, recommend excluding this final sentence from the policy text.

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 4 CORE POLICIES – SUSTAINABLE COMMUNITIES (Policies CP7 – CP10)

PART 4 CORE POLICIES – LOCAL ECONOMY (Policies CPI1 – CPI4)

CPI4 (Retail)

We note that the boundaries of the Shopping Area Zones have been amended within the draft plan. We do not, however, support these changes and believe that the Montague Shopping Centre should be taken out of the Primary Zone A and reclassified as Zone B.

Paragraph 85 of the NPPF supports greater flexibility in town centre planning policies to ensure that they can react and adapt to changing market forces. This includes incorporating flexible policies which allow growth and diversity in town centres and that can respond to rapid changes in the retail and leisure industries (criterion a). Policies should also plan positively to meet the scale and type of development needed in retail, leisure, office and all other main town centre uses (criterion d), and should encourage residential developments on appropriate sites to support the vitality of centres (criterion f).

Despite a comprehensive marketing process, both locally and nationally, the centre has attracted limited interest from A1 retail occupiers. In a market where traditional retail demand is declining and retail supply far outweighs demand, it is important the council and its local plan has a flexible approach to town centre development and planning to meet both current and future occupier demands.

In response to this, New River obtained planning permission in 2016 for the change of use of many of the units in the centre to A3 use. The proposed diversification of uses in the centre is identified as a positive within the Retail Needs Study:

'The Montague Centre is subject to a planning permission (ref no AWDM/1640/15) for a newly constructed free standing glazed kiosk and a change of use of Units 1, 2 and 6 to 12 to create restaurant/café floorspace, including public realm improvements. Existing anchor stores TK Maxx, HMV and Game are to be retained, while potential future occupiers of the new A3 floorspace include Nando's, Carluccio's and Patisserie Valerie. This scheme will transform and anchor this part of the town centre as a new eating, drinking and shopping destination, increasing footfall and on-street activity. Construction on the scheme has not yet commenced. We consider these proposals will, once implemented, represent a positive development for the town centre, and will assist in the Montague Centre making a more active contribution to the overall town centre offer.'

The Montague Centre, therefore, is an appropriate location for a more diverse retail/commercial as is encouraged within Zone B. It certainly should not be subject to the restrictive Zone A policy as drafted which resists any loss of A1 uses.

In regards the policy text, we object to the wording as currently drafted and recommend that this amended so that greater flexibility is permitted to encourage complementary uses alongside A1 retail uses. This is supported in the Retail Needs Study which recommends that there is scope to support Worthing town centre by “offering a broader town centre mix – an approach which its competing centres have successfully adopted – whilst continuing to invest in the environment and capitalising on its points of differentiation and seafront asset”.

We, therefore, recommend the policy text is amended to read:

“Primary Zone A – the policy approach is to retain the primary A1 retail function whilst encouraging alternative commercial uses (including certain A2, A3, A4, A5, D1, D2, B1) where they complement the primary A1 retail function of the Primary Zone A shopping area.”

**PART 4 CORE POLICIES – HISTORIC ENVIRONMENT
(Policies CPI5 – CPI6)**

**PART 4 CORE POLICIES – ENVIRONMENT AND CLIMATE CHANGE
(Policies CPI7 – CP23)**

This box is a fixed size - please continue on separate sheet(s) at the end if necessary

PART 4 CORE POLICIES – TRANSPORT AND CONNECTIVITY (Policies CP24 – CP25)

Worthing town centre benefits from good levels of transport infrastructure and the site, in particular, is well served by public transport facilities. Our proposals for the Montague Centre may provide an opportunity to increase parking provision on the site through the repurposing of the existing decommissioned service deck at first floor level.

This box will grow to allow you to add extra comments

**Additional comments continuation sheet(s) -
please mark clearly which section your comments carry on from**

REG 18 CONSULTATION OCT 31st – 12th Dec 2018**Representation**

Name	Jane Prior
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General comments

I am just about to look at the web site as advertised in the Argus of Nov.7th 2018. I am keen to send this email first as I know 5pm is deadline for comments. Late in responding for which I apologise

I and my husband retired to Worthing almost 10 years ago after a life time in different Professional careers.

My comments are motivated by the desire to see Worthing a place where it's citizens/residents are proud of their town and where the most vulnerable ie Children and the Elderly, those victims of Domestic abuse, Low income families, Homeless, are protected, respected, valued and cared for.

Services:

More Local Day centres for support of older population, ie. social/medical facilities/ advice centres/ help & support for patients with Dementia (eg CAB)

I'm not sure if there is a shop mobility scheme in Worthing like Littlehampton has but a SMS would be very welcome.

Good road and pavement surfaces, at present many are very unsafe and encourage flooding as the road camber is not right. eg along the Little hampton road between Thomas a Becket cross roads and Palatine road roundabout,.

More crossings with traffic light/green man across busy roads eg Palatine road.

Worthing Hospital needs more car parking spaces .

Roads:

Speed limit on all residential roads and traffic calming speed limitations.

Town Centre:

More 'anchor' shops which will add value and quality, like a John Lewis Dept store , a J.Sainsburys in town rather than only at Lyons farm.

Car Parks which are accessable and not all with the complicated system of keying in registration numbers etc, More BLUE BADGE spaces.

A 'Park and Ride' service with free bus to free up traffic in town centre.

Protection of vital cultural centres/buildings like Worthing Museum/Assembly room Connaught/Pavilion /Dome/Pier.

Support for community facilities like St Paul's Church ,

Support for vital places of support to vulnerable people like St Claires Day Centre, in common with many others the Anglican church to which I belong supports all the work amongst the Homeless formerly WCHP now called Turning Tides .

Green spaces:

We are blessed with some lovely parks,like Marine gardens and Beach House Park . Please ensure that they are protected and if possible more areas for flora and fauna, trees , flowers , gardens etc.

Play areas , more safe ones like the one on the beach opposite Marine gardens.

An ice rink/another leisure centre like Splash Point, so excellent but in school holidays woefully inadequate.

More educational gardens like the Eco garden on the beach in the town.

Affordable housing so important but it must not put an increased strain on the infrastructure of local Dr's/GP surgeries/ Southern water/sanitation etc.

Stop using plastic anywhere eg cups, bags, bottle/polystyrene,fast food outlets could find other receptacles or customers provide their own for takeaways. A plastic free council

More litter bins/facilities and significant fines for people who leave litter on streets and on the beach and fly tip.I have seen broken bottles on the beach .

A re cycling centre at Worthing tip where people can buy things good enough to be re-loved instead of land -fill.

Beach clean ups and beach patrol wardens.

I must close as time running out! Thankyou so much for reading this . I love living in Worthing and hope that I may be around to enjoy the Worthing of the future.

We must ensure that our development keeps pace with the available infra structure so that we do not overstrain our already stretched services. We must protect our environment and be ECO friendly in all we do.

The Mental Health of the population is enhanced by open spaces, birdsong, beauty, safety, appreciation, etc.

WORTHING LOCAL PLAN

Comments on Transport Policy CP24

1. OVERVIEW

- 1.1 The negative impacts of poor air quality and unchecked climate change are huge and transport is a major contributor. The strategic objective (SO20) to “provide an integrated, safe and sustainable transport system” is not backed up by a Transport Policy robust enough to ensure that Worthing will make a positive contribution to the UK’s legally binding targets on either issue. There is no sense of urgency; no measureable targets; and insufficient detail to turn an aspiration into a coherent plan.
- 1.2 The aspiration “to promote and enhance sustainable transport options to help achieve a shift in people’s travel behaviour” will remain an aspiration while the major investment continues to be in motorised transport. The Transport Policy embeds increases in road capacity through “improvements to the road network including the A259 and A27” and a Transport Assessment that details the remodelling of junctions within the borough to accommodate increases traffic from new developments.
- 1.3 ***In effect, the Transport Policy is aiming to accommodate more vehicles on Worthing’s roads, not less.*** In the short-term, improved journey times will make car journeys more attractive. The pressure to find more space for road capacity and car parking will further restrict the options for sustainable transport. Sustainable transport will continue to be regarded as mitigation that will be done as and when funding permits.
- 1.4 To make a significant shift away from car dependency – and tap into all attendant benefits – requires a new vision for transport; a move away from the ‘predict and provide’ approach in which transport models are based on past trends. The South Coast Alliance for Transport and the Environment has reviewed the evidence base and set out a detailed range of policy options in its report *A New Transport Vision for the Sussex Coast* ¹
- 1.5 The local evidence to support a new transport vision is strong:
 - In its 2017 consultation, Highways England conceded that it has no long-term solution to congestion on the A27, and that “local authorities would need to consider measures to reduce long term growth such as traffic restraint policies, improvements to public transport and increased cycling and walking.”
 - The report on the public consultation on increasing the capacity of the A259 to the west of Worthing [WSP, 2016] recorded “a number of issues and concerns (both technical and strategic) that need to be addressed going forwards, including... whether the improvement works will alleviate congestion on the A259 or simply move it elsewhere – e.g. to adjacent junctions, or rat-running through local communities.”
 - The potential for modal shift of short, local journeys is recorded in the WS Local Transport Plan [p29]: “the majority of traffic using the A27 in Worthing and Lancing starts or ends its journey in Worthing or Lancing, with around a third being through traffic.”
- 1.6 The Transport Policy CP24 needs specific commitments to support the NPPF objectives to prioritise walking and cycling with regard to:
 - The Adur & Worthing Local Cycling and Walking Infrastructure Plan [see 2.1 below].

- Cycle Infrastructure Design Standards [see 2.2 below].
- Key, arterial cycle routes [see 2.3 below].
- Policies and processes to support the provision of cycling and walking in new developments [see 2.4 below].

1.7 As an evidence base, the Transport Assessment gives only cursory consideration to cycling, and has failed to identify issues that need to be addressed by the Transport Policy:

- The conclusion is vague; is at odds with the WS Local Transport Plan; and does not recognise the importance of a progressive Road Space Audit [see 3.1 below]
- There are errors and omissions, amongst which the lack of an up-to-date inventory of cycling infrastructure is a major hindrance to effective planning [see 3.2 below].
- Road safety for cyclists is not analysed, and modifications to junctions discussed with no specific mention of the needs or safety of cyclists [see 3.3 below].

One conclusion is that a comprehensive and effective Local Cycling and Walking Infrastructure Plan (LCWIP) is absolutely essential.

2. COMMITMENT TO SUPPORT WALKING AND CYCLING

The Transport Policy CP24 needs specific commitments to support the NPPF objectives to prioritise walking and cycling.

2.1 Local Cycling and Walking Infrastructure Plan (LCWIP)

CP24 should put on record the intention that the Adur & Worthing LCWIP will be a supplementary planning document.

The ministerial forward to the NPPF says that “in order to fulfil its purpose of helping achieve sustainable development, planning must not simply be about scrutiny. Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives.” LCWIPs are defined in the NPPF as “a new, strategic approach to identifying cycling and walking improvements required at the local level”.

Paragraph 4.284 says that the policy (CP24) needs to “highlight the work of the Adur & Worthing Walking & Cycling Action Group (emerging Local Cycling and Walking Infrastructure Plan)”. This is not reflected in the policy itself and if the LCWIP is to be effective it needs more than ‘highlighting’.

To be effective, the Adur and Worthing LCWIP will need to have the status of a supplementary planning document. Moreover, it should be a requirement that it is updated when plans for new development are put forward. CP24 needs to make clear that the LCWIP will be operative in this way as soon as it is approved.

2.2 Cycle Infrastructure Design Standards

CP24 should set out that cycle infrastructure design standards must be used to support national and local strategies to increase levels of walking and cycling, and to improve safety.

Paragraph 4.295 of the supporting text is an invitation to developers to pick the least onerous standards: “When considering applications, proposals will be expected to comply with the criteria contained in Worthing Borough Council’s and West Sussex County Council’s adopted planning /

guidance documents relevant to design, car and cycle parking, ***or any other appropriate national standard.***” [My italics]

In order to support “the development of a network of high quality walking and cycling routes throughout the borough” [CP24, b, iii], it must be made clear that design standards are to be used with the intention to provide high quality infrastructure; not to justify the minimum quality possible. Moreover, the application of design standards must be based on a detailed assessment of the needs of all Non-Motorised Users and must take into account objectives to significantly increase the number of cycling trips and to improve safety.

2.3 Key Arterial Cycle Routes

CP24 should make specific commitments to the development of arterial cycle routes which are critical to the development of a Worthing Cycle Network.

- National Cycle Network Route 2 between Worthing and Littlehampton. Completion of NCN route 2 is prioritised in both the Coast to Capital Local Enterprise Partnership (LEP) Strategic Economic Plan and the West Sussex Strategic Transport Investment Programme. The section in Goring between George V Avenue and Sea Lane has been prioritised in the WSCC Local Transport Investment Programme.
- A24 Worthing Town Centre to Washington. Phase 1, Findon Valley to Findon Village, has been prioritised in the WSCC Local Transport Investment Programme, and feasibility work started.

2.4 New Developments

CP24 should require that plans for new developments include:

- **An accurate inventory of existing cycling infrastructure, including a qualitative assessment.**
- **An update (agreed with stakeholders) to both the Adur & Worthing LCWIP and the list of potential cycle routes in the WS Walking and Cycling Strategy.**

The Transport Assessment recognises that “new development brings an opportunity to consider the further development of the walking and cycling network to improve wider sustainable transport provision to serve the new development and existing residents alike.” The two requirements proposed here are designed to ensure that happens.

3. EVIDENCE BASE

As an evidence base, the Transport Assessment gives only cursory consideration to cycling and fails to identify issues that need to be addressed by the Transport Policy.

3.1 Assessment of Cycling Provision

The overall assessment of cycling provision is vague [“it could be considered that the existing network has some areas of limited provision and is missing links”; page 82]. This is at odds with the assessment in the WS Local Transport Plan:

The current provision of pedestrian and cycling facilities across the town are unable to support and maintain sustainable travel. Much of the network is disjointed and suffers from inadequate signing, safe crossing points and poor surfacing.

In order deliver on cycling in the future, there must be a recognition of the reasons for failing to deliver on previous plans, notably the Worthing Cycling Strategy (1999) and WSCC's proposed Worthing Cycle Network (2001). A critical element on which earlier plans have foundered is a refusal to reallocate road space away from car users.

To support the aim to prioritise sustainable modes of transport, a key element in the Transport Policy must be a progressive Road Space Audit.

3.2 Errors and Omissions

The Transport Assessment does not record the lack of an up-to-date inventory of existing (physical) cycling infrastructure; nor a qualitative assessment of its safety and fitness-for-purpose. One consequence is that there is no sound basis on which to plan cycling provision for new developments.

To support the aim to prioritise sustainable modes of transport, it must be a requirement that new developments provide an accurate inventory of existing infrastructure.

The Transport Assessment states that the Worthing Cycle Network was identified in the WS Walking and Cycling Strategy, but was not prioritised within the top five to be considered for feasibility work. Two key arterial routes that would provide the backbone of a Worthing Cycle Network were prioritised and WSCC has started feasibility work on:

- National Cycle Network Route 2; George V Avenue to Sea Lane, Goring.
- A24 corridor from Worthing Town Centre to Washington; phase 1 Findon Valley to Findon Village.

To support the aim to prioritise sustainable modes of transport, the Transport Policy should commit to the development of these cycle routes.

3.3 Road Safety for Cyclists

The Transport Assessment lacks an analysis of cyclists killed and seriously injured on the roads. Modifications to junctions are discussed without analysis of accident statistics for cyclists. A cursory examination of accident mapping shows a high incidence of cycling KSIs at junctions; including locations where some off-road provision is available.

To support the aim to prioritise sustainable modes of transport, the Transport Policy must address road safety for cyclists.

REFERENCES

¹ A New Transport Vision for the Sussex Coast

South Coast Alliance for Transport and the Environment (SCATE), in association with the University of the West of England (Bristol). Available from:

<http://scate.org.uk/transport-studies/a-new-transport-vision/>

Sustrans is the charity making it easier for people to walk and cycle. We are engineers and educators, experts and advocates. We connect people and places, create liveable neighbourhoods, transform the school run and deliver a happier, healthier commute. Join us on our journey. <http://www.sustrans.org.uk/>



SUSSEX ORNITHOLOGICAL SOCIETY

Registered charity 256936

www.sos.org.uk

REFERENCE

DWLP-M -109

Date received: 12/12/2018

12 December 2018

By e-mail only

worthinglocalplan@adur-worthing.gov.uk

DRAFT LOCAL PLAN FOR WORTHING_ CONSULTATION DOCUMENT OCTOBER 2018

The Sussex Ornithological Society (SOS) welcomes the opportunity to respond and contribute to the Worthing Draft Local Plan of October 2018. The Society very much supports the councils strong environmental focus and its aims, 'to protect and enhance the natural environment, recognising the valuable services, resources and benefits it provides'. It also notes that the most recent National Planning Policy Framework (NPPF) 2018 sees biodiversity as a core planning principle. We would like to see these aims realised.

Worthing's commitments to conserving wildlife, encouraging biodiversity and seeking to increase natural capital are all measures that the SOS is keen to support throughout Sussex. It is also encouraging that habitat diversity and the integration of green infrastructure are also highlighted as being an important aspect of future planning. The Society it is not only interested in the protection and enhancement of specific sites of ornithological interest but is also concerned about the welfare of the important links between different types of habitat that give access to migrating birds throughout the year. The position of Sussex makes it an important ornithological highway for birds moving into and out of the county throughout the seasons. These are the main reasons why we wish to see the Local Green Gaps protected and enhanced.

Local Green Gaps

Re 2.49: Specifically, the SOS supports Chatsmore Farm, Goring Gap, Brooklands and the land East of Brighton Road being designated as Green Gaps. We are aware that part of Chatsmore Farm and the whole of Goring Gap are candidate sites to become designated as LWS's. The whole of Goring Gap is an important area for birds as Appendix 1 demonstrates – in the last 10 years 127 species (31% of the Sussex list of 403 species) have been recorded using this site which comprises less than 0.1% of the land area of East and West Sussex. The Appendix shows that it is also an important site for roosting sea birds.

Brooklands is an equally important area for Sussex birds, and along with the other two designated Local Green Gaps these 4 sites provide strategically important (for

birds) open green corridors between the coast and the undeveloped SDNP to the north.

Core Policy 19

In terms of the core policies, Core Policy 19 Biodiversity (Worthing Plan, page 150. October 2018) is of the greatest importance to us and we would therefore like to warmly support its objectives and ask for a real commitment to them over the life time of the plan.

SOS supports section 4.243 where Worthing Borough Council acknowledges that it is important to conserve biodiversity outside of protected sites. We also welcome section 4.244 where “The 25 Year Environment Plan (2018) includes an action to embed an ‘environmental net gain’ principle for development” and where “Biodiversity net gain is development that leaves biodiversity in a better state than before”. We would encourage you to ensure that this is translated into policy.

We therefore support the objectives outlined in part a) but would urge that robust measures are put in place to ensure that mitigation (where necessary) is on a scale and of a type that adequately compensates for any habitat destruction.

In CP19 part b) we are pleased to see a commitment to the protection of SSSIs but would urge similar protection for Local Wildlife Sites and Biodiversity Opportunity Areas.

In CP19 part c) ‘wildlife corridors’ are referred to but not defined. We would suggest that areas such as Brooklands to the east of the borough and the Chatsmore/Ferring Gap to the west constitute such corridors and must be safeguarded. We would therefore like to see paragraph c) amended as follows;

*“Proposals for development in, or likely to have an adverse effect (directly or indirectly) on a Local Wildlife Site, ~~(including ancient woodlands, ancient/veteran trees, wildlife corridors, and stepping stones)~~ or Local Geological Site will not be permitted unless it can be demonstrated that reasons for the proposal **OVERWHELMINGLY** outweigh the need to safeguard the nature conservation value of the site/feature. Where an exception is considered the mitigation hierarchy will apply”.*

We see thorough ecological surveys as essential to any good planning application. SOS has over 3.5 million records of birds in Sussex, most of which are shared with the Sussex Biodiversity Records Centre. Our conservation role is to ensure that these records (facts about what birds are where) underpin all our conservation actions. Part e) reads “Assessment must be informed by appropriate up-to-date ecological information”. This is so fundamental that we would suggest that it should be the first paragraph, (a), not the fifth (e).

From CP19 part f) we would like to see developing clear guidance as to how environmental net gains are to be achieved. We have seen too many vague promises in planning applications regarding potential environmental gains only for these not to be realised once projects have been completed. In order to give effect to section 4.244 we would suggest that paragraph f) needs to be strengthened to read;

*f) Major development should take account of and incorporate **existing and new** biodiversity features at the design stage and ~~where possible~~ **environmental biodiversity** net gains should be achieved.*

CP19 part g) rightly encourages the planting of trees. We would like to see this taken further. The council should also encourage the development of shrubs and other types of low vegetation as they also support migrating birds as well as providing habitat for birds to breed in.

CP19 part h) and the importance of site management. Once again we warmly support this policy. We would encourage management that is sensitive to the needs of wildlife and is coordinated with other local and county authorities. This would ensure that management is both sensitive and appropriate to the local ecology and the season.

The Council's commitment to Green Infrastructure (Core Policy 20) is commendable. Given the proximity of the South Downs National Park and the references made to the work of adjoining Local Authorities we would hope that any future strategy produced by Worthing Council integrates policy initiatives outlined by these bodies.

We very much appreciate the constraints under which the Council is working but continue to stress to you that the Worthing area contains a number of unique pieces of habitat that once developed will never return. The protection and enhancement of the Local Green Gaps is vital to the health and well being of the local community. No development can in any sense enhance these areas and we would encourage you to strengthen your commitment to protect these sites.

Yours sincerely,

Richard Pulley
(SOS Conservation Team)

Copy: Richard Cowser (SOS Conservation Officer. conservation@sos.org.uk)

Appendix 1 – List of birds species recorded using Goring Gap, and roosting there.

**Goring Gap bird species list
2008 to Oct 2018**

Species Name	Status	
1 Brent Goose	Wv	
2 Red-legged Partridge	Occ v	
3 Grey Partridge	Occ v	Formerly bred
4 Common Pheasant	Occ v	
5 Grey Heron	Reg	
6 Little Egret	Reg	
7 Sparrowhawk	Res	
8 Marsh Harrier	Pm/Fo	
9 Hen Harrier	Pm/Fo	
10 Red Kite	Fo	
11 Common Buzzard	Reg/Fo	
12 Oystercatcher	Reg	
13 Lapwing	Occ v	Mainly winter
14 Golden Plover	Occ v	Mainly winter
15 Grey Plover	Pm/Wv	
16 Ringed Plover	Pm/Wv	
17 Curlew	Occ v	
18 Bar-tailed Godwit	Pm/Wv	
19 Turnstone	Reg	All months
20 Knot	Occ v	
21 Curlew Sandpiper.		
22 Sanderling	Reg	Aug to May
23 Dunlin	Reg	Aug to May
24 Little Stint	Occ v	
25 Common Snipe	Occ v	
26 Common Redshank	Reg	Sep to Apr
27 Kittiwake		
28 Black-headed Gull	Reg	
29 Little Gull	Occ v	
30 Mediterranean Gull	Reg	
31 Common Gull	Pm/Wv	
32 Great Black-backed Gull	Reg	
33 Herring Gull	Res	
34 Yellow-legged Gull	Occ v	
35 Lesser Black-backed Gull	Pm/Sv	
36 celand Gull	Occ Wv	
37 Glaucous Gull	Occ Wv	
38 Caspian Gull	Occ v	
39 Sandwich Tern	Sv	Mar to Oct
40 Common Tern	Pm	Mainly Aug/Sept
41 Feral Pigeon	Res	

42 Stock Dove	Res	Breeds
43 Woodpigeon	Res	Breeds
44 Turtle Dove	Occ v	
45 Collared Dove	Res	Breeds
46 Common Cuckoo	Occ v	
47 Tawny Owl	Res	Breeds
48 Short-eared Owl	Pm	
49 Common Swift	Sv	
50 Great Spotted Woodpecker	Res	Breeds
51 Green Woodpecker	Res	Breeds
52 Kestrel	Res	Breeds nearby
53 Hobby	Pm/Sv	
54 Peregrine	Reg	
55 Ring-necked Parakeet		
56 Jay	Res	Breeds
57 Magpie	Res	Breeds
58 Jackdaw	Res	Breeds
59 Rook	Occ v	
60 Carrion Crow	Res	Breeds
61 Raven	Occ v	
62 Waxwing		
63 Coal Tit	Occ v	
64 Blue Tit	Res	Breeds
65 Great Tit	Res	Breeds
66 Woodlark	Pm/ Wv	
67 Skylark	Res	Breeds
68 Sand Martin	Pm	
69 Barn Swallow	Sv/Pm	
70 House Martin	Sv/Pm	
71 Long-tailed Tit	Res	Breeds
72 Willow Warbler	Pm	
73 Chiffchaff	Reg	Breeds
74 Yellow-browed Warbler	Occ v	
75 Sedge Warbler	Pm	
76 Reed Warbler	Pm	
77 Grasshopper Warbler	Pm	
78 Blackcap	Reg	Breeds
79 Garden Warbler	Pm	
80 Lesser Whitethroat	Pm	
81 Common Whitethroat	Sv/Pm	Breeds
82 Dartford Warbler	Occ v	
83 Firecrest	Occ v	
84 Goldcrest	Reg	Breeds
85 Wren	Reg	Breeds
86 Nuthatch	Occ v	Has bred
87 Eurasian Treecreeper	Reg	Prob breeds
88 Rose-coloured Starling	Res	Breeds

89 Common Starling		
90 Ring Ouzel	Pm	
91 Blackbird	Res	Breeds
92 Fieldfare	Wv	
93 Redwing	Wv	
94 Song Thrush	Res	Breeds
95 Mistle Thrush	Res	
96 Spotted Flycatcher	Pm	
97 Robin	Res	Breeds
98 Common Nightingale	Occ v	
99 Black Redstart	Pm	
100 Common Redstart	Pm	
101 Whinchat	Pm	
102 Eurasian Stonechat	Pm/Wv	
103 Northern Wheatear	Pm	
104 House Sparrow	Res	Breeds
105 Dunnock	Res	Breeds
106 Yellow Wagtail	Pm	
107 Grey Wagtail	Pm/Wv	
108 Pied Wagtail	Res/Wv	
109 White Wagtail	Pm	
110 Meadow Pipit	Reg	
111 Tree Pipit	Occ v	
112 Rock Pipit	Wv	
113 Chaffinch	Res	Breeds
116 Brambling	Pm	
117 Bullfinch		
118 Greenfinch	Res	Breeds
119 Linnet	Pm/Wv	
120 Lesser Redpoll	Pm	
121 Common Crossbill	Occ v	
122 Goldfinch	Res	Breeds
123 Siskin	Pm	
124 Yellowhammer	Occ v	
125 Reed Bunting	Occ v	
126 Lapland Bunting		
127 Snow Bunting	Occ v	

Codes: Fo = Fly-over, Occ v = Occasional Visitor, Pm = Passage Migrant, Reg = Regular user
Res = Resident, Sv = Summer visitor, Wv = winter visitor

Goring Gap – roost counts
(Max numbers recorded 2008 to Oct 2018)

Little Egret 20
Oystercatcher 36
Grey Plover 120
Ringed Plover 290
Turnstone 270
Sanderling 250
Dunlin 700
BH Gull 370
Med Gull 5
Common Gull 2200
Great BB Gull 90
Herring Gull 100
Lesser BB Gull 12

Draft Local Plan for Worthing Consultation Document October 2018 Comments Form

**This consultation runs from Wednesday 31st October
to 5pm on Wednesday 12th December 2018**

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

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

Phone: 01273 263000

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

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Name	Francesca Iliffe	Date	12.12.18
Signed	Francesca Iliffe		

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.

Note: Unless you request otherwise (by putting a cross in the box to the right), all respondents will be added to the Worthing Local Plan consultee database and will be notified at all subsequent stages of Local Plan progression.	No: please don't add me	
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In addition, if you would like to subscribe to the Worthing Planning Policy Newsletter (which covers a wide range of Planning Policy issues) then please put a cross in this box:	
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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. However, contact details will not be published. Unfortunately, we cannot accept or report confidential or anonymous responses. Further information about how personal information is processed can be found on the Council's website in the Planning Policy Privacy Notice:

<https://www.adur-worthing.gov.uk/planning-policy/privacy-notice/>

All data will be stored securely in line with the GDPR.

SECTION B – COMMENTS

As set out below, this consultation document is formed of four parts. It would be helpful if you provide your comments under the relevant sections together with relevant policy number, paragraph and page numbers. However, if your comments are more general then your comments can be inserted in the box below.

GENERAL COMMENTS

General comments are that the Plan could include much more positive language – encouraging the kind of development that is sought by the Council, welcoming innovation, looking for the best standards rather than describing what will not be approved. In several instances the policy chapters could give more space indicating what is being looked for and the benefits.

This is a chance to be much more ambitious and visionary, welcoming development that is forward thinking, sustainable, inclusive, accessible, innovative, future resilient, delivers multiple benefits through design. What's good for the environment and people is also good for the economy and creates a much more investable, desirable places.

There is need across the plan, vision, objectives, allocations and policies for greater focus on *sustainable* development.

Historically Worthing was an area of market gardening. There has been massive loss of this food growing potential through development. There is opportunity to integrate food growing into developments in terms of productive edible planting where there is landscaping This can be done to deliver net environmental and biodiversity gains for biodiversity. NPPF asks plans to consider allocating areas for food growing: 118. Planning policies and decisions should: a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve **net environmental gains** – such as developments that would enable new habitat creation or improve public access to the countryside; b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage **or food production**. It is recommended that the Plan introduce this approach across the policies and allocations. There are several best practice planning guidance documents that indicate how this can be done.

This box is a fixed size - please continue on separate sheet(s) at the end if necessary

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 1 - INTRODUCTION AND CONTEXT

(this 'part' includes characteristics of the borough/issues and challenges and vision & strategic objectives)

Introduction –purpose of the plan should include delivery of sustainable development (since this is the golden thread running through the NPPF). Development should be generally referred to as sustainable development throughout. The Reference to the Presumption in favour of sustainable development is not enough – there needs to be hooks through the challenges, strategic vision and objectives.

Characteristics of the Borough should include reference to carbon emissions and where Borough is currently in terms of transitioning to a low carbon economy.

Throughout the plan, development should be referred to as sustainable development in line with NPPF. There is inadequate reference to the sustainability of development through the whole plan, and in this respect the plan has failed to align with the NPPF.

Issues and Challenges should include:

- challenge of decarbonisation. Data on Worthing carbon emissions can be obtained on the BEIS website.
- Fuel poverty stats should also be recognised and reflected here.
- Car dominated transport system and need to shift to active travel modes for a healthier environment and population, challenge of decarbonising transport, reduction in car use, increase in walking, cycling & public transport use

It would be good to see Excellent/high standards of development sought throughout the introductory section.

Continued

PART 2 - SPATIAL STRATEGY

(this 'part' sets out the proposed spatial strategy (what development and where) and the policies to deliver it)

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 3 - DEVELOPMENT SITES

(this 'part' includes details of the proposed future development sites)

Decentralised energy policy for the development sites

It is recommended that allocations for decentralised energy be added to the development sites policy. The NPPF states that to help increase the use and supply of renewable and low carbon energy and heat, plans should:

- provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);
- consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and
- identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.

The density of development and the frequently mixed use nature of development sites provide ideal conditions for successful, viable and efficient application of decentralised energy technologies, heat networks and smartgrids as a way of ensuring clean, affordable, secure energy into the future. These can be effectively linked in with smart transport solutions such as electric vehicle charging to ensure future proofed, resilient, clean development. Government ambition on this is clearly set out in the [Clean Growth Strategy](#) 2017, and [Industrial Strategy](#) 2017.

Continued

PART 4 CORE POLICIES - HOMES AND NEIGHBOURHOODS (Policies CPI – CP6)

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 4 CORE POLICIES – SUSTAINABLE COMMUNITIES (Policies CP7 – CPI0)

CP7 Healthy Communities

Greater reference could be made here to the role of food in creating healthy communities. Involvement on food growing projects can help people establish a healthier relationship with food and more involved in outdoor activity, contributing to addressing the obesity crisis. More can be made of the benefits of community food growing projects, not just allotments (4.92). Areas for community food growing can be integrated into public spaces and shared space in residential and non-residential developments. Food growing can also be integrated into landscaping proposals in the form of fruit and nut trees and berries and currant bushes, culinary herb plants. Since many of these are flowering they provide biodiversity benefits for pollinators as well as food plants for wildlife to forage, as well as for people to forage. Getting the community actively involved in managing their spaces can benefit physical and mental health and wellbeing, contribute to social cohesion and make places more active, climate resilient, attractive. Native, local varieties are always preferable. The benefits of food growing can also be integrated into policies CP20 Green Infrastructure and CPI9 Biodiversity. NPPF supports food growing in paras 91 and 118.

PART 4 CORE POLICIES – LOCAL ECONOMY (Policies CPI1 – CPI4)

PART 4 CORE POLICIES – HISTORIC ENVIRONMENT (Policies CPI5 – CPI6)

PART 4 CORE POLICIES – ENVIRONMENT AND CLIMATE CHANGE (Policies CPI7 – CP23)

CPI7 SUSTAINABLE DESIGN & CPI8 ENERGY

I strongly support this policy.

The inclusion of robust policy to support the transition to a low carbon future through radical reductions in carbon emissions; deliver development that is sustainable and mitigates against and is adaptable to climate change is strongly welcomed.

4.218

References to the NPPF and its guidance on carbon could be strengthened. Eg, in place of the sentence 'The NPPF requires.....impacts' insert:

The NPPF expects the planning system to support the transition to a low carbon future in a changing climate, and to contribute to “radical reductions in greenhouse gas emissions”. It requires plans to adopt proactive strategies to mitigate and adapt to climate change, in line with the provisions and objectives of the Climate Change Act 2008.

4.219

The climate crisis threatens future life on earth. This chapter could do with some stronger language to reflect this urgency

A landmark report by the UN Intergovernmental Panel on Climate Change in 2018 warns that urgent and unprecedented changes are needed to reach the Paris Agreement target for global warming to be kept to a maximum of 1.5c and 2c. This target is currently affordable and feasible, but unless increased action is taken in the next 12 years the target will not be reached. Beyond this half a degree will have devastating impacts on biodiversity and significantly worsen the risks of drought, floods, extreme heat and poverty for hundreds of millions of people.

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PART 4 CORE POLICIES – TRANSPORT AND CONNECTIVITY (Policies CP24 – CP25)

CP24 TRANSPORT AND CONNECTIVITY p162

I strongly support this policy but the references to active and sustainable travel could be strengthened.

I suggest this policy include 'Active Travel' in the title?

I also suggest the policy is written in a much more positive way – to strongly support active travel, talk about its benefits, state what the LPA is trying to encourage – walking, cycling, infrastructure/routes and public transport links that are safe and inclusive.

Worthing can take the lead in encouraging sustainable travel choices, including walking, cycling and public transport, which can improve congestion, air quality and public health.

Continued

This box will grow to allow you to add extra comments

Additional comments continuation sheet(s) - please mark clearly which section your comments carry on from

CONTINUED FROM PART I

Vision and objectives do not refer to sustainability enough. Some suggestions:

JSC have pledged to achieve 100% Clean Energy by 2050, Leaders will be signing the UK100 Cities Pledge in early 2019. This should be included in background info and included as a strategic objective.

VI could include **sustainable** and desirable place to live

V4. High quality new **sustainable** development

SO1 Deliver high quality **accessible and sustainable** new homes

SO7 Encourage the creation of healthy, **accessible, sustainable** environments

SO9 Strengthen Worthing's town centre as a location for shopping and business and enhance its role as a sub-regional centre, **accessible by sustainable transport**

ENVIRONMENT strategic objectives should also include

- delivery of sustainable, energy efficient, low carbon development, and an increase in renewable, decentralised, low carbon energy, decarbonised heat, facilitating heat networks to deliver radical reductions in greenhouse gas emissions, achieving 100% Clean energy by 2050. Development should facilitate affordable, clean, secure energy.

In SP4 & SP5

Development in these areas can be made to work much harder on biodiversity improvements and

sustainable design - in particular energy performance. In relation to energy see comments in relation to CPI7 & I8: On previously undeveloped and particularly greenfield sites there are even greater opportunities to maximise passive solar design – using orientation and design to deliver energy efficient design. These housing sites could also reasonably be expected to deliver more in regards to low carbon and sustainable design and, as greenfield sites, these locations are also likely to offer greater flexibility in master-planning and design of buildings to maximise the use of energy and sustainable design measures. Similarly, since they have a potentially greater impact on biodiversity, they could be expected to deliver greater enhancements.

CONTINUES FROM PART 3 - DEVELOPMENT SITES

I strongly support the approach taken and that the omission sites remain omitted from the plan.

It is strongly recommended that enhanced requirements should be specified in WLP Part 3 the Development Sites policies for decentralised energy. This could use some of the evidence base provided by the West Sussex Energy Studies. Below is a summarisation of these studies in relation to heat networks, but there may also be relevant information for other renewable and low carbon technologies relevant for development site allocations.

The West Sussex Sustainable Energy Study (CSE 2009) assessed opportunities for Combined Heat and Power (CHP) and district heating on West Sussex SHLAA sites. These were assessed against three criteria: development size (sites with more than 100 units and greater than 2 hectares) dwelling density (over 50dph); and proximity to existing heat loads. The study identified in Worthing 18¹ potential SHLAA sites meeting the 'rule of thumb' criteria for CHP/district heating. Of these 11 had high potential. The study recommends that the opportunity for the following sites investigate the feasibility of incorporating decentralised energy systems for district heating²: WB08197, WB08059, WB08039, WB08180, WB08053, WB08207, WB08052, WB08163, WB08049050051, WB08174 and WB08044. The study highlights that four of these sites - WB08039, WB08180, WB08207 and WB08174 have heat density figures above the heat density threshold (45kWh/m²/year), which makes them particularly good candidates to incorporate decentralised energy systems on-site. The study also notes that the identification of these sites is not all inclusive and other sites should also be investigated for opportunities for decentralised energy systems. (Note that this study, from 2009 was fairly focused on CHP as the energy solution to provide heat to heat networks, more recently govt policy focuses on technologies such as heat pumps to deliver a higher level of decarbonisation. However, the identification of opportunity remains relevant to whatever energy plant is used to supply heat).

If these sites remain undeveloped and remain allocated as housing sites, it is strongly recommended that enhanced requirements should be specified in WLP Part 3, the Development Sites policies.

The 2013 West Sussex Energy Study also explored the potential for heat networks. Potential heat network cluster areas were identified based on a high-level assessment taking into account the location of existing public buildings with significant heat loads which could act as anchor loads, new development, and existing infrastructure. One of the identified areas is Worthing town centre. The identified areas match the heat network priority areas identified in the West Sussex Sustainable Energy Study 2009.

ALLOCATIONS

A1 Caravan Club 44

Would like to see the ancient woodland referenced in the site description

Suggested additions to Requirements:

- innovative responses to the challenge of flood risk on the site, incorporating sustainable drainage and natural flood management solutions that offer amenity and biodiversity benefits, no net gain in run off
- deliver net gain in biodiversity, integrating green infrastructure and planting relating to the nearby ancient woodland, Titnore & Goring Woods

¹ West Sussex Sustainable Energy Study 2009 Table 30, page 82.

² West Sussex Sustainable Energy Study 2009 Annexe F pp137-138

- Deliver enhanced standards of sustainable design (over & above CPI7/18) including renewable, sustainable decentralised energy
- Maximise opportunities for integrating food growing into the residential development through productive planting (fruit trees, currants, berries, herbs) or provision of food growing areas

A2 Land west of Fulbeck Ave 46

Would like to see the ancient woodland referenced in the site description

Suggested additions to Requirements:

- innovative responses to the challenge of flood risk on the site, incorporating sustainable drainage and natural flood management solutions that offer amenity and biodiversity benefits, no net gain in run off
- deliver net gain in biodiversity, integrating green infrastructure and planting relating to the ancient woodland, Titnore & Goring Woods. The loss of scrub and vegetation likely to impact significantly on biodiversity, so efforts to deliver enhancements with the development must be maximised, including e.g. green walls and roofs
- Deliver enhanced standards of sustainable design (over & above CPI7/18) including renewable, sustainable decentralised energy
- Maximise opportunities for integrating food growing into the residential development through productive planting (fruit trees, currants, berries, herbs) or provision of food growing areas

A3 Upper Brighton Rd 48

Suggested additions to Requirements:

- incorporating sustainable drainage that offer amenity and biodiversity benefits, no net gain in run off
- deliver net gain in biodiversity, integrating green infrastructure and planting relating to the ancient woodland, Titnore & Goring Woods. The loss of scrub and vegetation likely to impact significantly on biodiversity, so efforts to deliver enhancements with the development must be maximised, including e.g. green walls and roofs
- Deliver enhanced standards of sustainable design (over & above CPI7/18) including renewable, sustainable decentralised energy
- Maximise opportunities for integrating food growing into the residential development through productive planting (fruit trees, currants, berries, herbs) or provision of food growing areas

A4 Decoy Farm 50

Suggested additions to Requirements:

- incorporating sustainable drainage that offer amenity and biodiversity benefits, no net gain in run off
- as site on urban fringe, deliver net gain in biodiversity, integrating green infrastructure and planting
- Deliver enhanced standards of sustainable design (over & above CPI7/18) including renewable, sustainable decentralised energy. (Use of electricity generating renewable energy generating technologies are particularly important on employment sites which have higher electricity use than other forms of development – employment buildings and industrial/light industrial buildings are especially well suited to solar PV due to their large simple roofs).
- Employment sites should offer opportunities for employees to travel by active means – additional safe secure cycle parking, shower facilities, lockers.
- Electric vehicle charging above required parking standards requirements.
- Allocation for solar farm??

Town Centre Sites

In all the town centre sites there is need to deliver climate adaptation – particularly green infrastructure to address heat island effect , provide urban cooling and shading and create development, buildings and spaces that are attractive, liveable and investable. City centre sites also need to work hard to address surface and groundwater flood risk, this means minimising run off so that flooding is not created elsewhere by the incoming development – and to avoid the new development suffering from flooding where it is already known to exist. Flood risk will only increase in future, so development needs to be built to be permeable and to store rainfall – this can be done whilst providing biodiversity and amenity benefits. Hence it is recommended that all town centre sites include these requirements.

Additionally the West Sussex Energy Studies identify sites with density as having opportunities for heat networks, this should be backed up by allocation policy.

The town centre sites are likely to increase urban congestion and poor air quality unless an active approach is taken to secure development securing sustainable transport approaches.

A5 Teville Gate 52

Suggested additions to Requirements:

- Deliver innovations sustainable urban drainage solutions to manage the risk of surface and groundwater flooding, that offer amenity and biodiversity benefits, with no net gain in run off, (reflecting relationship to culverted watercourse?) and minimising wherever possible flood risk locally.
- Explore opportunities to deliver a sitewide heat network, with smart, decentralised energy, renewable energy and radical carbon reductions.
- Deliver net gain in biodiversity, integrating green infrastructure and planting
- Deliver an exemplar sustainable transport scheme
- Employment sites should offer opportunities for employees to travel by active means – additional safe secure cycle parking, shower facilities, lockers.
- Since in an area served by excellent public transport – the development could offer car free development and parking spaces for a car club. Electric vehicle charging above required parking standards requirements.
- Deliver high quality sustainable design

A6 Union Place 54

Suggested additions to Requirements:

- Deliver innovations sustainable urban drainage solutions to manage the risk of surface and groundwater flooding, that offer amenity and biodiversity benefits, with no net gain in run off, and minimising wherever possible flood risk locally.
- Explore opportunities to deliver a sitewide heat network, with smart, decentralised energy, renewable energy and radical carbon reductions.
- Deliver net gain in biodiversity, integrating green infrastructure and planting
- Since in an area served by excellent public transport – the development could offer car free development and parking spaces for a car club. Electric vehicle charging above required parking standards requirements.
- Deliver an exemplar sustainable transport scheme
- Employment sites should offer opportunities for employees to travel by active means – additional safe secure cycle parking, shower facilities, lockers.
- Deliver high quality sustainable design

A7 Grafton 56

Suggested additions to Requirements:

- Explore opportunities to deliver a sitewide heat network, with smart, decentralised energy, renewable energy and radical carbon reductions.
- Since in an area served by excellent public transport – the development could offer car free development and parking spaces for a car club. Electric vehicle charging above required parking standards requirements.
- Deliver an exemplar sustainable transport scheme
- Deliver high quality sustainable design

A8 Civic Centre Car Park 58

Should the red line include the Wheatsheaf and the current health building?

Should site description & site constraints refer to the Listed Buildings?

Suggested additions to Requirements:

- Deliver sustainable urban drainage solutions to ensure no additional risk of surface flooding, that offer amenity and biodiversity benefits, with no net gain in run off,
- Explore opportunities to deliver a sitewide heat network, with smart, decentralised energy, renewable energy and radical carbon reductions.
- Deliver net gain in biodiversity, integrating green infrastructure and planting
- Since in an area served by excellent public transport – any residential development could offer car

free development and parking spaces for a car club. Electric vehicle charging above required parking standards requirements.

- Deliver an exemplar sustainable transport scheme
- Employment sites should offer opportunities for employees to travel by active means – additional safe secure cycle parking, shower facilities, lockers.
- Deliver high quality sustainable design

Areas of Change (AOC) 60

It is recommended that the approaches outlined above re sustainable transport, climate resilience, energy, green infrastructure are applied to the Areas of Change – depending on whether they are urban fringe or town centre.

CPI10 DELIVERING INFRASTRUCTURE

The Government has committed in its 25 Year Environment Plan to end the sale of all new conventional petrol and diesel cars and vans by 2040, to tackle air pollution and reduce GHG emissions. As a result new electric vehicle cars are expected to be in excess of 35% of all car sales by 2040 (Bloomberg New Energy Finance). To facilitate the shift to electric vehicles, electric vehicle charging infrastructure must be available across the borough. Developments are encouraged to provide charging infrastructure as part of their transport provision, and new developments are encouraged to be EV charge ready.

Over the Plan period there will be a shift to greater use of electric vehicles. Charging infrastructure will need to be provided with new development/changes of use. A lack of charging infrastructure in future may negatively impact the visitor and businesses economy and disincentivise residential buyers. Therefore it is recommended that the Plan includes policy and targets for provision of electric vehicle charging. West Sussex recently drafted parking standards guidance which referred to EV charging, but these standards are widely seen as not going far enough. An option may be to adopt Standards for development which ramp up over time (e.g. 20% parking spaces from 2020, 30% from 2022, 40% from 2024).

CONTINUED FROM CPI7 SUSTAINABLE DESIGN & CPI8 ENERGY

4.219

To the first sentence listing cc effects, I suggest adding other significant cc impacts:
heatwaves and extreme weather events

4.229

Govt's WMS of 2015 has really now be superseded and so it should be contextualised as being in the past tense. E.g.

The Written Ministerial Statement of 25 March 2015 (HCWS488) sets out the government's then new national planning policy on the setting of technical standards for new dwellings. The Ministerial Statement stateds that Local Authorities would continue to be able to require energy performance standards higher than Building Regulations up to the equivalent of Code for Sustainable Homes Level 4 (Code for Sustainable Homes Level 4 equates to 19% below Part L Building Regulations 2013). More recently, the government confirmed in its response to the draft revised NPPF consultation that local authorities' powers to require energy efficiency standards above Building Regulations (Planning and Energy Act 2008) are unrestricted by the Framework.

4.230

This para refers to all development. Clarification is needed as many of the assessment methods and standards referred to are for new housing only (e.g. DER, TER, SAP, CSH). It appears this para refers to all Residential new build development, if so this should be stated in the 1st sentence.

If the 19% reduction in CO2 is also being applied to non resi development but these have different assessment methods called SBEM and the Building Regs assessment targets are expressed through BER and TER (Building Emission Rate and Target Emission Rate).

4.231

I suggest this para goes after 4.232 as it splits up 2 paras on energy performance.

4.232

The approach of using EPC certificates as a way of securing good practice standards in development is strongly welcomed. National legislation dictates that all development must produce an EPC and this therefore puts no additional burden on the developer. It can be secured pre occupation as they must be produced on completion. When submitted to the Planning Authority if the EPC Certificate is secured by condition, it is easy for development management and the public to see the standard achieved.

I suggest that for clarification this para is split so that it refers to non resi in one para, and resi in another. It's also recommended that a minimum EPC standard be applied to new dwellings as well as to non-residential buildings.

4.232

Given the urgent need to deliver housing that is energy efficient, and the Clean Growth intention to ensure all homes are highly energy efficient, it is recommended that all new homes are built to EPC B as a minimum. The text states that 80% of new homes in Worthing are built to EPC B. The remaining 20% should be brought up to this standard, which is clearly achievable and affordable by the large majority. The current approach of setting an EPC C standard, risks potentially bringing the majority down to a lower level, which is not the overarching intention of CPI7.

4.232 refers to retrofitting: it is assumed this refers to new units or dwellings created in existing buildings and/or as part of change of use? Retrofit of existing dwellings or buildings may otherwise not be a planning matter, but be covered by Building Regulations.

4.233-4.234

The inclusion of policy that promotes sustainable design is strongly welcomed.

However, the text could be improved by giving more focus on some of the measures that deliver passive solutions. For example:

The layout, orientation and design of buildings are important in manipulating natural energy resources (daylight, sunlight, solar heating and cooling) to minimise energy use and create healthy living and working environments. Passive heating, cooling, lighting and ventilation can be enhanced through measures such as orientation; shading; thermal mass; insulation; airtightness; room placement; fenestration size and aspect; glazing ration; landscaping and planting. Use of these and other sustainable design measures can contribute to energy efficient, passive solar heating during the winter and passive cooling through summer to avoid overheating. Development should demonstrate how sustainable building design is being integrated into development.

Overheating is an increasing issue for development as the climate warms and the frequency of heatwaves increases, threatening public health. Urban heat island effect exacerbates this problem. Development proposals should reduce potential overheating and reliance on air conditioning systems. They can do this through, the passive cooling hierarchy: minimising internal heat generation through energy efficient design; reducing the amount of heat entering a building in summer through orientation, shading, albedo, fenestration, insulation and green roofs and walls; managing the heat within the building through exposed internal thermal mass, high ceilings and passive ventilation; and mechanical ventilation.

Renewable and Low Carbon Energy

Paragraphs 4.236-7

This section could be strengthened. The NPPF states that to help increase the use and supply of renewable and low carbon energy and heat, plans should:

- provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);
- consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and
- identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.

This section should be strengthened by adding some text on the government's ambition to decarbonise heat as set out in the [Clean Growth Strategy](#) 2017, Heat Strategy: [The Future of Heating: A strategic](#)

[framework for low carbon heat in the UK](#), 2012 and call for evidence [Future Framework for Heat in Buildings](#) 2018.

It is therefore strongly recommended that enhanced requirements should be specified in WLP Part 3, the Development Sites policies for decentralised energy. This could use some of the evidence base provided by the West Sussex Energy Studies. Below is a summarisation of these studies in relation to heat networks, but there may also be relevant information for other renewable and low carbon technologies relevant for development site allocations.

West Sussex County Council produced a 2013 [Energy Study](#) (AECOM) which is more up to date than the 2009 study referred to in this section.

The West Sussex Sustainable Energy Study (CSE 2009) assessed opportunities for Combined Heat and Power (CHP) and district heating on West Sussex SHLAA sites. These were assessed against three criteria: development size (sites with more than 100 units and greater than 2 hectares) dwelling density (over 50dph); and proximity to existing heat loads. The study identified in Worthing 18³ potential SHLAA sites meeting the 'rule of thumb' criteria for CHP/district heating. Of these 11 had high potential. The study recommends that the opportunity for the following sites investigate the feasibility of incorporating decentralised energy systems for district heating⁴: WB08197, WB08059, WB08039, WB08180, WB08053, WB08207, WB08052, WB08163, WB08049050051, WB08174 and WB08044. The study highlights that four of these sites - WB08039, WB08180, WB08207 and WB08174 have heat density figures above the heat density threshold (45kWh/m²/year), which makes them particularly good candidates to incorporate decentralised energy systems on-site. The study also notes that the identification of these sites is not all inclusive and other sites should also be investigated for opportunities for decentralised energy systems. (Note that this study, from 2009 was fairly focused on CHP as the energy solution to provide heat to heat networks, more recently govt policy focuses on technologies such as heat pumps to deliver a higher level of decarbonisation. However, the identification of opportunity remains relevant to whatever energy plant is used to supply heat).

If these sites remain undeveloped and remain allocated as housing sites, it is strongly recommended that enhanced requirements should be specified in WLP Part 3, the Development Sites policies.

The 2013 West Sussex Energy Study also explored the potential for heat networks. Potential heat network cluster areas were identified based on a high-level assessment taking into account the location of existing public buildings with significant heat loads which could act as anchor loads, new development, and existing infrastructure. One of the identified areas is Worthing town centre. The identified areas match the heat network priority areas identified in the West Sussex Sustainable Energy Study 2009.

CPI7 POLICY section

Policy (a)

- Recommended that a 'B' rating be secured for all new development, and a 'C' rating for new dwellings or units created in existing buildings.
- If BREEAM excellent is secured for major non residential development this leaves a policy vacuum for those substantial developments that are non major. Recommended that a BREEAM standard be adopted for schemes over a certain size but less than major

Policy (b)

- As the plan period progresses, it is likely that heat networks will be installed – in future there may be opportunities to secure developments to connect to existing heat networks, so this should be added to the policy.

CPI7 POLICY section

Are there any sites suitable for wind energy in the development plan? Is this technology then ruled out? Industrial areas provide excellent context for this technology.

CPI9 BIODIVERSITY p148

³ West Sussex Sustainable Energy Study 2009 Table 30, page 82.

⁴ West Sussex Sustainable Energy Study 2009 Annexe F pp137-138

This policy does not go far enough to enhance biodiversity.
improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity (NPPF)

Whilst the text opens with discussion of net gain, this could be brought into the policy more forcefully. The *policy wording* focuses on what will happen where development may result in adverse impacts. The policy could work harder on *promoting and seeking the benefits* of habitat creation, biodiversity enhancements, including those which extend habitats, reduce the isolation of existing areas of habitat and improve 'local biodiversity' close to where people can appreciate it on a daily basis. The policy could be improved by identifying the importance of biodiversity for people, and how schemes can improve quality of life through this.

The NPPF repeatedly refers to enhancement and protection whereas CPI9 focuses more on protection. To better reflect NPPF the policy and supporting text should be seeking biodiversity *enhancements* and net gain.

Where ecological designations exist, the policy could be asking developments in the vicinity to be restoring and creating wildlife habitats, connecting local sites and joining up local action. Such as within the setting of the NIA, development should be encouraged to incorporate innovative approaches to nature conservation enhancement, such as the inclusion of biodiverse roofs and walls on buildings.

The policy encourages tree planting which is welcomed. However, the policy does not stress trees should be planted which are either native or support local wildlife.

Where landscaping is incorporated into proposed development, this should focus on provisions of plant, tree and shrub species that support wildlife. E.g. native and fruiting species and those which are good for pollinators.

It would be good to mention the impacts of climate change and that when creating new habitats, biodiversity friendly landscaping, schemes should be resilient to expected changes in climate – summer droughts, heatwaves, winter flooding.

When providing other elements of development e.g. sustainable drainage, to do this in a way that creates habitats – ie to always bear in mind that green space needs have multifunctional benefits – for wildlife, people, leisure, climate adaptation, sustainable drainage, etc.

The policy doesn't currently specify what information the applicant will need to submit – this would add clarity for developers.

When providing plants that are good for wildlife foraging, these can also be good for people. Integrating productive/edible planting (shrubs, hedgerows that provide fruits/berries/nuts) are good for providing multiple benefits.

POLICY

19f should not refer to Major developments only, it should apply to all development

CP20 GREEN INFRASTRUCTURE p151

I strongly support this policy.

4.251 – Blue infrastructure includes sustainable drainage – it doesn't just relate to streams and water bodies. Any SUDs can and should add biodiversity enhancements and form part of GI.

4.253 Trees also provide urban cooling – and they sequester carbon, contributing to climate adaptation and mitigation.

POLICY

Is there a slight risk that until the Green Infrastructure Strategy is produced, there could be a policy vacuum? Does the policy stand alone and is the policy text clear enough on requiring GI as part of the scheme in the interim?

Could a green roofs policy be included in policy text requiring a proportion of roofs to be green roofs? Could the Tree Cover proportion be written into a policy requirement (re para 4.245 of the Biodiversity policy)? Tree planting rates are two-thirds lower than they need to be (see 2018 [Progress Report to Parliament](#), Committee on Climate Change)

E.g. [London Plan policy](#): Major development proposals should be designed to include roof, wall and site planting, especially green roofs and walls where feasible, to deliver as many of the following objectives as possible:

- a adaptation to climate change (ie aiding cooling)
- b sustainable urban drainage
- c mitigation of climate change (ie aiding energy efficiency)
- d enhancement of biodiversity
- e accessible roof space
- f improvements to appearance and resilience of the building
- g growing food.

CP21 FLOOD RISK AND SUSTAINABLE DRAINAGE p153

I strongly support this policy but would like to see greater encouragement of sustainable drainage across all proposed schemes.

Supporting Text:

4.258

The wording 'ensure new development is safe from flooding' feels inappropriate. Firstly, its very difficult to ensure *any* development is completely safe from flooding particularly with the onset of climate change/ rainfall events witnessed in recent years. Secondly, new development could be made 'safe from flooding' at the expense of the surrounding area. It may be better to stick with *mitigating and minimising flood risk* on people, property and wildlife. New development will be proposed within the surrounding area with its various levels of localised or generalised flood risk from surface water, groundwater, sewer, river, coast, etc etc. Its aim should not be just to ensure the new development has minimal flood risk, it should be working to minimise and mitigate flood risk full stop (for itself and Worthing generally).

I disagree with the use of the wording 'is safe from' in this para and anywhere elsewhere in the policy. I also disagree with this paragraph restricting the application of policy to the *new development* alone. (This is not aligned to the policy wording (a)).

I also recommend that at the start of this supporting text, it is clarified that all development will be expected to deliver measures to mitigate and minimise flood risk, through e.g. use of sustainable drainage. Perhaps 4.264 could be brought into the supporting text earlier, as all majors must comply with this.s

4.261

This para describes natural flood management, it would be helpful to have a similar description of and support for sustainable drainage measures, since these will be used by the majority of proposed developments. When describing and encouraging these, use of soakaways should be the last option only due to their negative impacts on aquifer water quality. Soakaways are usually the drainage measure of choice for most developers, but they can cause acute negative impacts on drinking water quality (as can be seen in the [SDNP CHAMP project](#) about chalk block aquifers)

Perhaps reference should be made to the Source Protection Zones in this policy? – and that measures applied in these areas must not impact on water quality?

POLICY text:

Its suggested this policy should be cross referenced with CPI9 Biodiversity, CP20 Green Infrastructure, and CP22 Water Quality & Protection.

Some suggestions for the policy wording (in red)

- a)... Flood risk in Worthing is *managed and* reduced
- a) ... through natural flood management *and sustainable drainage* to deliver...
- a) ... to deliver multifunctional benefits for people (*see policy CP7, 8 and 22*), wildlife (*see policy CP19 and 20*).

Would like greater support for Sustainable Drainage Ds, For example, policy from Brighton & Hove Draft City Plan Part 2 DM43 on Sustainable Drainage :

- *The design and layout of all new buildings, and the development of car parking and hard standing, will be required to incorporate appropriate Sustainable Drainage Systems (SUDS) capable of ensuring that there is a reduction in the level of surface water leaving the site unless it can be demonstrated not to be reasonably practicable.*
- *SUDS should be sensitively located and designed to ensure that the quality of local water is not adversely affected; and should promote improved biodiversity, an enhanced landscape/townscape and good quality spaces that improve public amenities in the area.*

CP22 WATER QUALITY AND PROTECTION p156

I strongly support this policy.

Supporting text:

4.270 Worthing is aiming for 'excellent' bathing water quality by 2020 through addressing drainage/sewerage issues (project with SW) – Environmental Health officer Kathryn Adderson working on this project.

4.271

Use of soakaways should be the last option only in SFRA zones due to their negative impacts on aquifer water quality. Soakaways are usually the drainage measure of choice for most developers, but they can cause acute negative impacts on drinking water quality (as can be seen in the SDNP CHAMP project about chalk block aquifers)

POLICT TEXT

Suggested improvements in red to consider impact on ecology and wildlife:

- a) i) it does not have an unacceptable impact on the quality and potential yield of local water resources and the water environment *and its ecology*

CP23 POLLUTION AND CONTAMINATION p158

I strongly support this policy.

Supporting text

4.275

Poor air quality is largely as a result of road transport emissions from vehicles with combustion engines it's not just about congestion. I suggest this first line is amended.

4.276

New development can also impact AQ through onsite emissions of fuels for combustion technologies (boilers etc). I suggest this is amended.

Whilst new developments can aim to reduce their transport related emissions, one of the key approaches is to support active travel (through walking cycling and public transport) and also through facilitating use of electric vehicles as part of the development. These approaches should be strongly encouraged through this policy. The policy should be clearly linked to CP7, CP10 (delivering EV charging infrastructure) and CP24.

POLICY text

The AQ Limit values could be referred to in this policy?

d) states 'where appropriate'. For clarity it should be stated *where this policy applies*

Could the [Sussex Air checklist](#) be referred to in this policy?:

Checklist 1: Screening checklist

Checklist 2: Air quality and emissions mitigation assessment requirement checklist

CP24 TRANSPORT AND CONNECTIVITY p162

Over the Plan period there will be a shift to greater use of electric vehicles. Charging infrastructure will need to be provided with new development/changes of use. This is important for Worthing to be resilient and future proofed. A lack of charging infrastructure in future may negatively impact the visitor and businesses economy and disincentivise residential buyers. Therefore it is recommended that the Plan includes policy and targets for provision of electric vehicle charging. West Sussex recently drafted parking standards guidance which referred to EV charging, but these standards are widely seen as not going far enough. An option may be to adopt Standards for development which ramp up over time (e.g. 20% parking spaces from 2020, 30% from 2022, 40% from 2024).

CP24 could encourage car free development and the provision of car clubs spaces as part of schemes as a way of reducing congestion, promoting active travel, reducing car use. This is an adopted policy in e.g. Brighton & Hove.

It would be good to include supporting text on electric vehicle charging infrastructure.

Supporting Text

I suggest active travel be put at the start of this policy approach

4.285

The Council ~~has a strategic aim wants~~ to [promote opportunities for walking and cycling](#), improve connectivity and promote a more integrated and sustainable transport network, ~~as well as facilitate improved opportunities for active travel~~. To achieve this, the Local Plan seeks to locate and design development and supporting infrastructure to [facilitate active and sustainable travel, and](#) minimise the need to travel by car ~~and promote sustainable travel~~. [In line with Public Health England's Active Travel guidance and WS Walking & Cycling Strategy, the Council aims to encourage walking and cycling to be the first choice for shorter journeys. This approach delivers multiple benefits that include improving people's health, and reducing poor air quality by improving traffic flows.](#)

4.288

Comments on CO2 emissions from the WS Transport Plan could be strengthened. Could use the following (see (2018 [Progress Report to Parliament](#), Committee on Climate Change for further info):

Suggested text:

The UK government has made considerable progress on reducing GHG (greenhouse gas) emissions in the UK following adoption of the CCA 2008. However, during this time emissions from transport have flatlined, and in the last 5 years have actually risen. In the last 10 years, transport has become the largest GHG emitting sector representing over a quarter of emissions. These emissions need to be reduced urgently to avoid catastrophic climate change.

The Government has committed in its 25 Year Environment Plan to end the sale of all new conventional petrol and diesel cars and vans by 2040, to tackle air pollution and reduce GHG emissions. As a result new electric vehicle cars are expected to be in excess of 35% of all car sales by 2040 (Bloomberg New Energy Finance). To facilitate the shift to electric vehicles, electric vehicle charging infrastructure must be available across the borough. Developments are encouraged to provide charging infrastructure as part of their transport provision, and new developments are encouraged to be EV charge ready.

4.288

The accessibility section of this paragraph could be split into a separate paragraph.
The issues need to be *addressed* – not just *recognised*.

4.289

Whilst it is recognised this section is a summary of the WS TP, please be positive about public transport when mentioning it. The services exist, AWC is reasonably well served by bus, coach and train.
If Can AWC say that these issues are being worked on rather than referring to them in this negative form.

4.291

The links to the LCWIP need to be stronger and more positive, and ideally provide a level of protection/support for the proposed routes and zones (outputs of the LCWIP). The LCWIP will be finalised by the end of 2019 so there should be time to link to the final document.

Suggested text:

West Sussex local authorities are working together to improve walking and cycling infrastructure across the county. Dept of Transport funding has supported development of Local Cycling & Walking Infrastructure Plans (LCWIPs). In Worthing the development of a LCWIP is being supported by the Adur & Worthing Cycling and Walking Action Group. The aim of this work is 'to create a place whereby walking and cycling becomes the preferred way of moving around Adur and Worthing'. The LCWIP will be completed by the end of 2019, it aims to support the development of safe routes for cycling and walking and increase uptake of cycling and walking. The Worthing LCWIP will provide: a network plan for walking and cycling which identifies preferred routes and core zones for further development; and a prioritised programme of infrastructure improvements for future investment. Any developments sited on these routes and/or in core zones should deliver transport provision aligned to the LCWIP.

POLICY

It would be good to have reference to:

- the LCWIP in the policy.
- 'active travel' on the first paragraph of (a)
- (a) v) refers to 'significant demand' as a trigger for requiring a Transport Assessment/Statement. For clarity – this should be defined. Does the WS guidance require enough detail on active travel? Should AW be setting out what it wants to see in transport assessments?
- B) iii) improved access over the railway also (this is a severs the borough for walkers and cyclists)
- B) iv) good to see EV charging here – a target would make policy stronger

Parking standards could be added to this policy for

- Cycles
- Low emissions vehicles, especially electric charging infrastructure

The policy could be split up into sections focused on and give specific direction about each:

- Walking
- Cycling
- Public transport
- Safe & inclusive travel

This could include: access to and from development for cyclists/pedestrians/wheelchair users etc; improvements to wider pedestrian/cycling/public transport environment; maintain or improve routes; giving consideration to desire lines; parking standards for cycles and cars; considerations for cycle parking – well lit, secure, covered, etc; high quality cycling facilities – workplace showers, lockers, changing rooms; facilities to promote public transport; access to public transport; contributions to improvements/extensions; protect & enhance pub transport routes; avoiding creating safety problems or dangers; inclusive access for disabled users; do not prejudice implementation of proposed road safety improvements or improvements set out in the LCWIP/WS LTP etc; create safe layouts minimising collision risk.



REG 18 CONSULTATION OCT 31st – 12th Dec 2018

Representation

Name	David Bowie
Organisation	Highways England
Address	Highways England, Bridge House, 1 Walnut Tree Close, Guildford, Surrey, GU1 4LZ
Email	david.bowie@highwaysengland.co.uk

WLP Database	Yes
Newsletter	No

General comments

Consultation: Worthing Borough Council – Draft Local Plan 2016 – 2033 Regulation 18 Consultation

Highways England reference:

Thank you for your email and attached letter of the 31st October advising Highways England of the Draft Worthing Local Plan 2016 -2033 Regulation 18 Consultation and inviting Highways England to comment. Highways England have previously responded to the council on the 22nd June 2016 regarding its Issues and Options consultation and earlier this year on the 2nd February regarding the Infrastructure Delivery Plan.

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, in this case the A27 / A24 Trunk Road.

In our previous communications Highways England have offered to work with the council in developing its Transport Assessment supporting the Local Plan proposals. Unfortunately, this offer has not been fully embraced and Highways England has been presented with a final document which regrettably does not address our concerns with regard to the cumulative impacts of the strategic allocations presented in the draft Local Plan. Your consultants WSP sought Highways England's consent to use our strategic transport modelling (which was used to assess our A27 RIS proposals) which was agreed. However, Highways England advised that whilst the model was fit for the purposes of economic trunk road option assessment it may not be suitable for assessment of strategic allocations of any Local Plan proposals. This is because Local plans are assessed using different guidance and policies to major highway investment schemes. Accordingly our advice was that the model should be reviewed and amended and re-validated to ensure that it was fit for purpose for Worthing's Local Plan.

The modelling work as presented uses an average peak period assessment (averaged over three hours) which is not appropriate for the assessment of the Local Plan. Accordingly, Highways England cannot accept the findings of the report as presented. In addition to this fundamental concern with the modelling approach, we require further details on the TRICS rates and some more detail information on the trip distribution. For example, all leisure and retail trips have been excluded as they are assumed to be linked or internal!

As the Council is aware there is currently no preferred scheme for the A27 improvements in Worthing. Therefore the Local Plan requires morning and evening peak hour assessments including mitigation if required.

I therefore suggest that, as a matter of some urgency, the council with consultants WSP meet early in the new year to address our initial concern with the modelling approach before we proceed with any further detail.

Highways England do not wish to be in a position whereby we will be advising that the plan is not sound on the basis of robustness of the supporting Transport Assessment. Whilst we have a role to facilitate development our primary concern is with the safety and efficiency of the network.

I trust that the above is of assistance and look forward to meeting early in the new year to resolve our fundamental concerns.

Representations on behalf of:

West Sussex County Council

Draft Worthing Local Plan

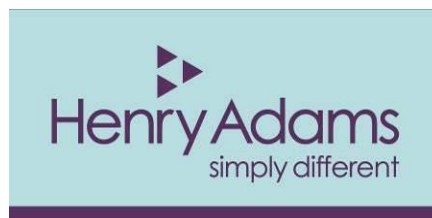
**Published for public consultation from Wednesday 31 October 2018 to
Wednesday 12 December 2018**

**Land edged red on the enclosed plan and described as Land on the North
side of Offington Avenue and on the South-West side of Warren Road,
Worthing**

REFERENCE

DWLP-M -112

Date received: 12/12/2018



CONTENTS

Section		Page
1	Introduction	3
2	Site Background and Description	3
3	Sustainability	3
4	Worthing Previous HELAAs	3
5	Conclusion.....	3

Appendices

Appendix 1 – Location Plan

1. Introduction

Henry Adams acts on behalf of West Sussex County Council (WSCC) who are the landowners of land on the north side of Offington Avenue and is identified by the land edged red on the attached plan. The statement confirms that the landowners wish to make the land available for development and for it to be considered as having potential for development in the Local Plan period.

2. Site Background and Description

The land is edged red in **Appendix 1** of this statement and is identified as land on the north side of Offington Avenue. The site is located outside of any flood zones, is flat and approximately 0.5 acres in size. It is currently vacant with no access to the public available. Further, the site has no identified constraint as part of the adopted or emerging Worthing Plan.

3. Sustainability

The site is currently within the Settlement Policy Boundary of Worthing and has no policy or natural constraints. To illustrate the sustainability of the site, below I have listed nearby facilities in Worthing and their proximity to the site.

Worthing

- ▶ Worthing Recreation Ground – 260m
- ▶ Worthing College – 400m
- ▶ Durrington High School – 1.8km
- ▶ Worthing High School – 1.1km
- ▶ Sainsbury's – 1km
- ▶ Bus Stop - 100m
- ▶ Chichester Cathedral – approx. 2.0km

The subject site is approximately 0.5 acres in size and it is our opinion that a development of around 5 - 10 units could be deliverable at this site. There are no major natural constraints that restrict development overall on the site and therefore, the site should be considered sustainable in taking account of the three dimensions for sustainability set out in the NPPF.

4. Worthing Previous HELAAs

The site has been identified in previous HELAAs and the 2017 HELAA identified the site under reference WB15011 and land to the east of 2 Offington Avenue. The site was rejected, however, not due to reasons that preclude development, but due to its size not being able to provide 6 dwellings which is the threshold in the HELAA. It is our opinion that a well-designed development that consists of flats, could potentially provide more than the 6 dwellings identified in the HELAA and therefore making best use of the land.

5. Conclusion

In conclusion, the landowner hopes their queries are taken into consideration during the consultation and subsequent review of the Local Plan. The landowner states that the land is available for development and could provide best use of land within the Settlement Policy Boundary.

Appendix 1 – Location Plan



Draft Local Plan for Worthing
Consultation Document October 2018
Comments Form

This consultation runs from Wednesday 31st October
to 5pm on Wednesday 12th December 2018

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

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

Phone: 01273 263000

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

Section A - Contact Details

First name	ANTHONY		
Last name	DINES		
Organisation	WORTHING TRANSITION TOWN		
Address line 1	[REDACTED]		
Address line 2			
Town			
Postcode	[REDACTED]	Telephone	[REDACTED]
Email address	[REDACTED]		

Name	TONY DINES	Date	12.12.2018
Signed	A J. Dines		

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.

Note: Unless you request otherwise (by putting a cross in the box to the right), all respondents will be added to the Worthing Local Plan consultee database and will be notified at all subsequent stages of Local Plan progression.	No: please don't add me	+
--	-------------------------------	---

In addition, if you would like to subscribe to the Worthing Planning Policy Newsletter (which covers a wide range of Planning Policy issues) then please put a cross in this box:	+
---	---

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. However, contact details will not be published. Unfortunately, we cannot accept or report confidential or anonymous responses. Further information about how personal information is processed can be found on the Council's website in the Planning Policy Privacy Notice: <https://www.adur-worthing.gov.uk/planning-policy/privacy-notice/>
All data will be stored securely in line with the GDPR.

SECTION B – COMMENTS

As set out below, this consultation document is formed of four parts. It would be helpful if you provide your comments under the relevant sections together with relevant policy number, paragraph and page numbers. However, if your comments are more general then your comments can be inserted in the box below.

GENERAL COMMENTS

This box is a fixed size - please continue on separate sheet(s) at the end if necessary

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 1 - INTRODUCTION AND CONTEXT

(this 'part' includes characteristics of the borough/issues and challenges and vision & strategic objectives)

Worthing, in common with much of our surrounding area is already over developed and congested.

It has been pointed out by many that future development is restricted by the sea to the south and the downs to the north. Therefore future growth needs to be minimised and housing development restricted to "affordable" and social housing. Immediately there should be a feasibility study of bringing empty properties back into use.

PART 2 - SPATIAL STRATEGY

(this 'part' sets out the proposed spatial strategy (what development and where) and the policies to deliver it)

Any development should only take place on brown field sites

Boxes are fixed size - please continue on separate sheet(s) at the end if necessary

PART 3 - DEVELOPMENT SITES

(this 'part' includes details of the proposed future development sites)

The development at Teville Gate, being so close to the railway station, could include a transport centre providing comprehensive information on all public transport. It would be preferable to locate this at the north end as near as possible to the station

PART 4 CORE POLICIES - HOMES AND NEIGHBOURHOODS **(Policies CPI – CP6)**

This box is a fixed size - please continue on separate sheet(s) at the end if necessary

PART 4 CORE POLICIES – TRANSPORT AND CONNECTIVITY (Policies CP24 – CP25)

Whilst some bus service provision is very good, notably the the 700 coastal service during the day and early evening, places to the north of the town have a very infrequent service during the day and nothing at all in the evening and at times at weekends. This obviously leaves these populations dependent on expensive taxis if they want to come into town for theatre etc, if they do not have cars or are unable to drive. Priority should be given to addressing this.

This box will grow to allow you to add extra comments

**Additional comments continuation sheet(s) -
please mark clearly which section your comments carry on from**

REFERENCE

Comment No: DWLP-M-114

Date Received: 10-12-18

6-12-18

Dear Sirs,

re: Policies SP5 - SP6

Goring - Ferring Gap, CHATSMORE Farm.

I have lived in Goring for 14 years and am writing about my concerns re: the above. These spaces are unique and special. To have farming land reaching the coast is rare, and is so appreciated by many, many people. To see houses built on this land will surely take so much away from this area. People are so healthy here because we have open space, and not so much pollution, so we need to preserve all this.

Also, as we are all being encouraged

2, to eat less meat, surely this ground is needed for farming and the jobs for farmers.

Please keep those areas as they are for our health and wellbeing in the future. This land is so appreciated by people and farmers alike.

Yours faithfully

A black rectangular box redacting the signature of the sender.

10/12

WORTHING BOROUGH
COUNCIL.

MR & MRS A TESTER.

PLANNING POLICY
PORTLAND HOUSE
44 RICHMOND RD.
WORTHING
BN 11 1HS.



DEAR SIRS

WE HAVE TOTAL SUPPORT
FOR BOTH SP5 & SP6, THE AMOUNT
OF WILDLIFE ANY BUILDING OF HOUSES
WOULD ENDANGER IS CONSIDERABLE.
THERE IS ALSO THE FACT THE
LOCAL ROAD SYSTEMS ARE AT
OVERFLOW POINT ALLREADY.

REFERENCE

Comment No: DWLP-M- 115

Date Received: 10-12-18

Yours sincerely



R. ELDERFIELD

PLANNING Policy Team,
W.B.C.
PORTLAND HOUSE,
44 RICHMOND ROAD,
WORTHING BN11 1HS.

Re. Goring Gap - SPS & SP6 - L.P.

I am writing to make sure that the Goring Gap remains as a gap, as it is an important part of Worthing.
I believe it is a designated "Green Space" and I hope it will remain so.

Yours faithfully

REFERENCE

Comment No: DWLP-M-116

Date Received: 10-12-18

(6/12/18)

10/12

REFERENCE

Comment No: DWLP-M- 117

Date Received: 10-12-18

27887_Add_B

E/0191072/1.2

6th December 2018

Dear Sirs

Policies SP5 & SP6 for both the
Goring-Ferring Gap & Chatsmore Farm.

We strongly support the Council's
Local Plan to designate these land areas
as both a Local Green Gap (SP5) and
Local Green Space (SP6).

Everyone we had discussed these plan with
joins us in fervently valuing the peace
& serenity of both areas, the views of the
Sea, the diminishing opportunities for informal
recreation, dog walking and enjoying wild life.

Yours faithfully

MR A. I. SPENNER & MRS G. A. SPENNER

REFERENCE

Comment No: DWLP-M-118

Date Received: 13-12-18

13th December 2018

Dear Sirs

I would like to give support to protect our green gaps along the coast and up to the downs along Ferring, Goring and East Preston.

Green gaps like these give our part of the coast-line its character and are important for wildlife of which on the Ferring and Goring gap we get a lot of over-wintering scarce birds plus nesting birds as Sky hawks in Spring.

A lot of visitors come for the recreation to be had on

these gaps as well as
enjoying the beach and sea.

We residents love the
uniqueness of our area and
would miss it for our lovely
walks.

Yours faithfully

[REDACTED]

MRS.

Worthing Borough Council
Planning Policy

10 December 2018

REFERENCE

Comment No: DWLP-M-119

Date Received: 13-12-18

Dear Sirs

Re: Policies SP5 and SP6

We wholeheartedly support the Local Plan to designate The Goring-Ferring Gap and Chatsmore Farm as both a Local Green Gap and Local Green Space.

We certainly place great value on both these areas, and enjoy almost daily walks here. It would be ~~devastating~~ devastating to see it ruined by developers.

We sincerely hope you will be successful.

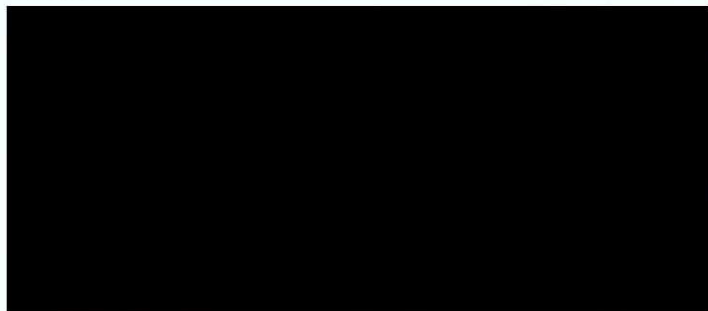
Yours faithfully

SALLY + NORMAN BRAND

REFERENCE

Comment No: DWLP-M- 120

Date Received: 13-12-18

Mr. Andrew and Mrs
Sarah Allen

11 December 2018.

Dear Sirs

Re: Policies SP5 and SP6 the Goring-
ferrung Gap and Chatsmore Farm.

We wish to inform you of our support
for the above policies.

We place great value in both local Green
gaps and local Green space for wildlife,
recreation and unspoilt views for all to
enjoy.

It is important these areas remain unchanged.

Many thanks.



MR



Mr. Tim Coughlan & Mrs. Alison Coughlan

10th Dec 2018

REFERENCE

Comment No: DWLP-M-121

Date Received: 13-12-18

Ref: Local Plans (SP5) (SP6)

Dear Sir/Madam,

We would like to inform you of our views regarding the above plans. We have lived in this road for nearly 18 years and would very much like to protect these areas and the wildlife that inhabit them. Our children have grown up here, enjoying playing and walking our dogs. We still enjoy the walks now with our granddaughter.

Whilst we understand that space for development and housing is limited, there are so few pretty and tranquil areas with important views left.

Please consider very carefully allowing Persimmon to challenge the protection of these areas because once its gone, it's gone forever!

Yours Sincerely

REFERENCE

Comment No: DWLP-M-122

Date Received: 10-12-18

7-Dec-2018

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

Dear Sir,

Support for SP5 & SP6 designating Goring Gap Local Green Gap and Green Space

I am a local resident of Goring-by-sea and have been so for some 35 years. My family amongst many in the area have appreciated the benefit provided by the Goring-Ferring gap greatly and would like to think that this amenity was preserved to likewise deliver benefit for many families to come.

The immediate access to a little piece of countryside from homes all around the gap is a special resource which adds value to the lives of everyone living around the gap and should be preserved. There is always a need for new developments which I understand, but in order for those developments to deliver a good quality of life to their residents we need to ensure we preserve a balance of open space around them. In the case of the Goring Gap, this IS the open space for the residential areas that surround it within which there isn't any other space where residents can find a bit of peace.

Yours Sincerely

Graham Whiting

REFERENCE

Worthing Borough Council
Planning Policy
Portland House
44 Richmond Road,
Worthing, West Sussex.
BN11 1HS

Comment No: DWLP-M- 123

Date Received: 10-12-18

3rd December 2018

Dear Sirs,

The Goring & Ilex Conservation Group has informed us that there is a challenge from Persimmon Homes to the Local Plan which will hopefully designate the Goring-Ferring gap and Chatsmore Farm as both a Local Green gap (SP5) and Local Green Space (SP6).

It is our strong opinion that it is time to draw a line under the development of Green spaces at the cost of the environment, local residents to the short-term gain of a Property development company such as Persimmon Homes. Both current and future generations will have to live with the negative results of such a development purely to satisfy the profits and shareholders of a public company in what is after all a one off transaction.

Recent publicity of what the public see as excessive directors bonuses being paid by Persimmon further demonstrate that the profits of such a company are significant but many including us, conclude that this is likely to be at the expense of the environment and the beautiful countryside that continues to be urbanized.

Yours faithfully
Simon & Katie Watteau.



REFERENCE

Comment No: DWLP-M- 124

Date Received: 10-12-18

Mr D.N. Wright,
05th December 2018

Reference: Goring Gap. SP5, SP6

Dear Sir,

I wish to support the local plan to designate the Goring-Ferring gap and Chatsmore Farm as both a local Green Gap (SP5) and Local Green Space (SP6).

This land is possibly the last of its type in as much as farmland goes right to the sea. It provides a separation between Goring and Ferring. It is a welcome open space, vital to wildlife.

If housing is so desperately needed the focus should be to build on brown field sites, not areas of tranquillity and beauty.

Why is there pressure to build on the Goring Gap when there are currently eight new developments within the area with numerous unsold houses which are currently advertised on The Right Move.

Finally, Aldsworth Avenue would not be able to cope with additional traffic as it is the busiest road in the area.

Yours sincerely,


David Wright

REFERENCE

Comment No: DWLP-M- 125

Date Received: 10-12-18



6th December 2018

Dear Sir/ Madam

RE: Draft Worthing Local Plan – Goring Gap and Chatsmore Farm (Policies SP5 and SP6)

I am writing to express my deep concern over the threat posed by any future building development undertaken on the Goring-Ferring Gap and Chatsmore Farm.

These areas provide a much appreciated space for local residents and visiting holiday makers to enjoy recreational activities and appreciate the beauty and tranquillity of the natural environment.

The Goring Gap is one of the few areas on Britain's south coast where the fields reach down to the beach and we should cherish, value and protect this natural asset. I believe these areas serve to enhance the health and wellbeing of all generations who travel to enjoy the fresh air and unspoiled views. Any development would, I believe permanently destroy the established flora and fauna thriving on this land.

It is for these reasons that the idea of "sustainable development" on these areas would not satisfy the sustainable framework as listed in Table 1 of the Plan.

Additionally, any development would detract from the appeal of Worthing and have a detrimental effect on the future long term economic success of our historic town.

In essence, destruction of these areas would serve as a lasting reminder as to the folly of land development at any (environmental) cost.



REFERENCE

Comment No: DWLP-M- 126

Date Received: 10-12-18



4 December 2018

Dear Sirs,

Draft Worthing Local Plan

**Goring-Ferring Gap and Chatsmore Farm
Local Green Gap (SP5) and Local Green Space (SP6) status**

I am writing to support the policy to designate the Goring-Ferring Gap and Chatsmore Farm as both Local Green Gap (SP5) and Local Green Space (SP6). I believe these areas are important and should be safeguarded. My principal reasons are:

- These areas support considerable and diverse wildlife. I have seen many wild birds, mammals and amphibians there. In particular, there are many bats and skylarks (both of which are quite rare nowadays). When we have had snow, I have seen deer tracks right down to the beach, which indicates deer, and no doubt other wildlife, use these green spaces as a corridor within which to travel.
- These areas are enjoyed and used by large numbers of people; from walkers, dog-walkers, even people flying model aeroplanes etc. The use of this unspoiled place enhances the lives of the people of Worthing (and from elsewhere too) and contributes to their physical and mental well-being.
- It is one of the very few places left where one can look from the sea to the downs, and it is important that heritage is preserved. Most of our coast line has been lost to building and areas such as this where, in the words of Kipling, "Here leaps ashore the full Sou'west, All heavy-winged with brine" are becoming all too rare.
- These areas provide a defined gap between Goring and Ferring, which would otherwise be yet another continuous conurbation. The Gaps play a major part in defining the character of the area.

I shall be grateful if these views can be taken account of when the matter is considered.

Yours sincerely,



Adrian Peters.



WORTHING BOROUGH
COUNCIL



Office use Only:

Comment
number

M

127

Date received

10/12/18

**Draft Local Plan for Worthing
Consultation Document October 2018
Comments Form**

**This consultation runs from Wednesday 31st October
to 5pm on Wednesday 12th December 2018**

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

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

Phone: 01273 263000

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

Section A - Contact Details

First name	ANNE		
Last name	ROLPH		
Organisation			
Address line 1			
Address line 2			
Town			
Postcode		Telephone	
Email address			

Name	Mrs ANNE ROLPH	Date	5-12-18
Signed			

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.

Re: Draft Local Plan for Worthing

1) Local Green Gaps - SP5 and SP6-LP Pages 25-37

(i) Goring-Ferring Gap (ii) Chatsmore Farm

I agree that these gaps should be fully protected for both humans and wildlife. The reasons given by the council are excellent.

(iii) Brooklands.

This should also be protected as a much needed recreational area to the east of the town.

2) WORTHING LEISURE CENTRE, Shaftsbury Avenue
AOCH - LP pages 66-67

Provided that the running track and outdoor floodlight pitches remain I agree with the plan. The running track is the only one in Worthing and with the increased obesity problem is much needed.

5 December 2018

ANNE KOLPH



WORTHING BOROUGH
COUNCIL



Worthing
Local
Plan

Office use Only:

Comment number	M-128
Date received	10/12/18

**Draft Local Plan for Worthing
Consultation Document October 2018
Comments Form**

**This consultation runs from Wednesday 31st October
to 5pm on Wednesday 12th December 2018**

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

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

Phone: 01273 263000

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

Section A - Contact Details

First name	DAVID		
Last name	ROLPH		
Organisation			
Address line 1			
Address line 2			
Town			
Postcode		Telephone	
Email address			

Name	DAVID ROLPH	Date	5/12/2018
Signed			

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.

Re Draft Worthing Local Plan

GORING GAP SOUTH AND GORING GAP NORTH (CHATSMORE FARM)
(SP5 & SP6-LP pages 25-37)

I agree that the gaps should be fully protected and the reasons why given by the council are excellent.

BROOKLANDS (SP5 & 6-LP) pages 25-37.

I agree that this should also be protected.

THE WORTHING LEISURE CENTRE, SHAFTSBURY AVENUE
(AO4 - LP pages 66-67)

I agree with plan but wish that both the outside enclosed football pitches under floodlight and the running track should be retained.

DAVID ROLPH.

5/12/2018.

Office use Only:	
Comment number	M-129
Date received	10/12/18

Draft Local Plan for Worthing Consultation Document October 2018 Comments Form

This consultation runs from **Wednesday 31st October**
 to 5pm on **Wednesday 12th December 2018**

Website: www.adur-worthing.gov.uk/worthing-local-plan
 Email: Please email this completed form to worthinglocalplan@adur-worthing.gov.uk
 Phone: 01273 263000
 Address: Planning Policy Team, Worthing Borough Council,
 Portland House, 44 Richmond Road, Worthing, BN11 1HS

Section A - Contact Details

First name	NATALIE		
Last name	CROPPER		
Organisation			
Address line 1			
Address line 2			
Town			
Postcode		Telephone	
Email address			

Name	NATALIE CROPPER	Date	7/12/18
Signed			

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.

Note: Unless you request otherwise (by putting a cross in the box to the right), all respondents will be added to the Worthing Local Plan consultee database and will be notified at all subsequent stages of Local Plan progression.	No: please don't add me	<input checked="" type="checkbox"/>
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In addition, if you would like to subscribe to the Worthing Planning Policy Newsletter (which covers a wide range of Planning Policy issues) then please put a cross in this box:	<input type="checkbox"/>
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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. However, contact details will not be published. Unfortunately, we cannot accept or report confidential or anonymous responses. Further information about how personal information is processed can be found on the Council's website in the Planning Policy Privacy Notice:

<https://www.adur-worthing.gov.uk/planning-policy/privacy-notice/>

All data will be stored securely in line with the GDPR.

SECTION B – COMMENTS

As set out below, this consultation document is formed of four parts. It would be helpful if you provide your comments under the relevant sections together with relevant policy number, paragraph and page numbers. However, if your comments are more general then your comments can be inserted in the box below.

GENERAL COMMENTS

See PART 2 spatial Strategy
PART 3 Development Sites

Please continue on separate sheet(s) at the end if necessary

Please continue on separate sheet(s) at the end if necessary

PART 1 - INTRODUCTION AND CONTEXT

(this 'part' includes characteristics of the borough issues and challenges and vision & strategic objectives)

PART 2 - SPATIAL STRATEGY

(this 'part' sets out the proposed spatial strategy (what development and where) and the policies to deliver it)

LOCAL GREEN GAPS SP5 & SP6 PAGES 25-37

AT THE END OF THE 1939 WAR THE DEVELOPER OF GORING HALL ESTATE WAS AWARDED MONETARY COMPENSATION BY THE GOVERNMENT. NOT TO BUILD ON THE COASTAL GAP BECAUSE THEY REALIZED ITS INTRINSIC VALUE TO PREVENT COALESCENCE BETWEEN WORTHING AND FERRING. TO THIS DAY THIS PRECIOUS GAP HAS BECOME A MECCA FOR PEOPLE COMING FROM FAR AND WIDE TO ENJOY THE UNSPOILT NATURAL SEASCAPE AND VIEWS LOOKING NORTH TO HITCHDOWN A NATIONAL MONUMENT AND NATIONAL TRUST LAND.

THE FAMOUS ILEX AVENUE, A MAJESTIC DOUBLE ROW OF EVERGREEN OAKS TRAVERSES THE GAP FROM EAST TO WEST IMMEDIATELY NORTH OF THE AGRICULTURAL LAND, AND IS CLEARLY VISABLE FROM NORTH AND SOUTH. THE OTHER REASON FOR MAINTAINING THIS COASTAL AREA FREE FROM DEVELOPMENT IS ITS PERFECT BARE RESTING AND FEEDING AREA FOR INCOMING BIRDS AND OUTGOING MIGRATING SPECIES. I SUPPORT THE LOCAL GREEN SPACE DESIGNATION AS WE LIVE JAMMED TOGETHER, AND WE NEED OUR SPACE MORE THAN EVER.

Please continue on separate sheet(s) at the end if necessary

PART 3 - DEVELOPMENT SITES

(this 'part' includes details of the proposed future development sites)

OS 1. Land East of Titmore Lane

When the original plans for the DURREINGTON Development in 2002 this site was included showing a roundabout access and a link to the rest of the site. There was enormous OPPOSITION from the public (marches & banners etc) Consequently the proposition was ABANDONED. The owner of this land is having another attempt. And interestingly a SURVEY of the Lane was carried out on the 21st Nov. and the Lane was closed to Traffic.

THIS LAND IS HIGHLY SENSITIVE for the following reasons:

1. TITMORE & GURING WOODS COMPLEX LWS including ANCIENT woodland runs through the centre of the site & its borders
2. Setting of National Park. Grade 3 agricultural (pasture for sheep)
3. There is abundant wildlife which would be compromised with the urbanization & introduction of DOGS and CATS.
4. The land has flooding on a regular basis. Water flows from the DOWN and fills the adjacent FISHING LAKE.
5. Traffic Lights are going to be introduced at Titmore Way and it is obvious if this land was released, Titmore Lane would lose its irreplaceable natural attractive quality and ROAD WIDENING WOULD FOLLOW.

PART 4 CORE POLICIES - HOMES AND NEIGHBOURHOODS

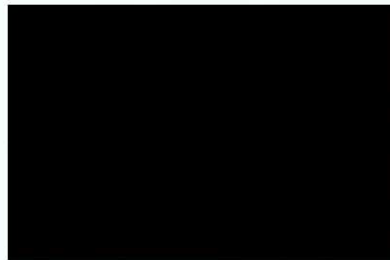
(Policies CPI - CP6)

Please continue on separate sheet(s) at the end if necessary

REFERENCE

Comment No: DWLP-M- 130

Date Received: 11/12/18



8 December 2018

Dear Sir/Madam

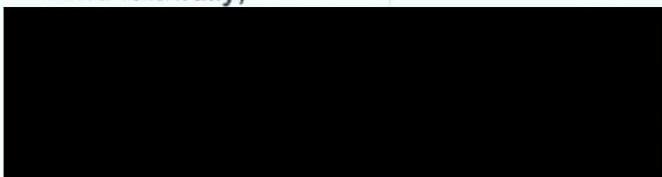
DRAFT WORTHING LOCAL PLAN

I am writing to support **Policies SP5 and SP6** regarding retention of the Goring-Ferring Gap and Chatsmore Farm as Local Green Space.

Both of these sites provide valuable recreational space and wildlife habitats and are a break from the Brighton to Littlehampton urban sprawl. With the increase in housing along the length of the A258 corridor retention of this space is vital as it is so limited elsewhere in the plan area. In addition, the views from Highdown Hill and the South Downs National Park are also so important locally.

I would support increased leisure and recreational use for both sites to overcome deficiencies elsewhere in the plan area.

Kind faithfully,



David Carden

Mr Allan L. Plumpton

REFERENCE

Comment No: DWLP-M- 131

Date Received: 11/12/18

8th Dec 2018
Worthing Borough Council
Planning Policy
Portland House
44 Richmond Road
Worthing, West Sussex
BN11 1HS

Dear Sirs

**Re 1] Policies SP5 [Local Green Gap] = for the Goring-Ferring Gap
And 2] SP6 [Local Green Space] Chatsmore Farm**

I write to strongly support the above proposals and ask the Council and its officers to confirm these policy proposals as highly desirable on the following grounds:

1 the Goring-Ferring Gap. This site is open countryside
1.1 represents a much needed greenfields lung between the urban sprawl of Worthing and Goring and the village of Ferring and to provide a recreational area for local residents and visitors too, which promotes the Council's aim to increase visitor footfall to the Worthing area.
1.2 Goring gap is one of the Council's 'crown jewels' and they should do all in their power to prevent Persimmon [the current owners of this land] from developing any part of this land for housing or industrial purposes.

2 Chatsmore Farm This site is open ground too, has been used for recreational purposes by the nearby Chatsmore Catholic school for a number of years. If it is developed for housing etc., it may well lead to bussing children to sports facilities elsewhere which will exacerbate the frequent congestion on the already overloaded A27 and A259 as well as the local roads. Hopefully Local Green Space status can be attributed to this particular site to prevent such an unwelcome scenario arising.

Yours f

Allan Plumpton

REFERENCE**Comment No:** DWLP-M- 132**Date Received:** 11-12-188th December 2018

Dear Sir or Madam,

In Support of Local Plan Policies SP5 & SP6 for Goring Gap & Chatsmore Farm

I am writing to voice my strong support for the designation of the Goring-Ferring Gap and Chatsmore Farm as both a Local Green Gap (SP5) and Local Green Space (SP6) in the Worthing Local Plan.

As a local resident for many years, I place great value on these high quality areas as both Local Green Gaps and Local Green Space for informal recreation such as dog walking, their abundant wildlife, tranquillity and views both to and from the South Downs National Park.

It is vitally important that these open spaces are protected from development for future generations.

Yours sincerely,



Clive Lacy

REFERENCE

Comment No: DWLP-M- 133

Date Received: 11-12-18

8th December 2018.

Dear Sir or Madam,


In Support of Local Plan Policies SP5 & SP6
for Loring Gap & Bhatmore Farm.

I am writing in support of the protection of the Loring - Ferring Gap and Bhatmore Farm as both a Local Green Gap (SP5) and Local Green Space (SP6).

These valuable open spaces should be protected as they ^{are} enjoyed by many people for their informal recreation, views and wildlife.

It is my strong opinion that these open spaces should be spared from development.

Yours sincerely,

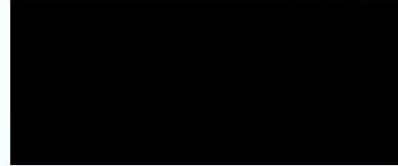

PENELOPE LACY

REFERENCE

Comment No: DWLP-M- 134

Date Received: 11-12-18

Paul & Jacquie Green



December 7, 2018

Worthing Borough Council
Planning Policy
Portland House
44 Richmond Road
Worthing

Dear Sir or Madam:

We are writing to support the designation of the Goring - Ferring Gap and Chatsmore Farm as both a Local Green Gap (SP5) and Local Green Space (SP6).

The areas are valuable recreational spaces and provides a strategic green gap between Goring and Ferring. The view south from Ilex Way across unbroken farmland to the sea is special, as is the view north from the sea to the South Downs. Many species of animals live in the areas and it is a valuable roost for seabirds. The areas are used by many local residents and the loss of such an important Green Space would be detrimental to the area

Sincerely,



Paul & Jacquie Green

REFERENCE

Comment No: DWLP-M-135

Date Received: 11-12-18

5/12/2018

Dear Sirs,

I strongly urge you to adopt the Goring/Ferris Gap and Chatham area as Local Green Gap (SLG) and Local Green Space (SLG)

It is such a unique area. From Littlehampton to Rottingdean there are buildings on the sea-front with the only exception of "The Goring Gap". I fly gliders & from the air it is very striking. To be able to walk through fields to the sea without passing buildings is very special & something my wife and I do most days.

People have to have homes & there is a crisis in affordable housing for young people. However, people don't have to live in the only un-developed section of sea-front for miles in each direction.

I urge you to do the right thing & protect this unique area.

Yours faithfully,

PAUL FRITCHE

REFERENCE

Comment No: DWLP-M-136

Date Received: 11-12-18

8.12.18

To whom it may concern.

I Caroline Fritche of the above address have read the Consultation taking place.

I urge the decision makers to agree the Local Plan to designate the Goring-Ferry Gap + Chatmore Farm as both Local Green Gap (SP5) + Local Green Space (SP6).

These areas are very unique to this local area which is becoming too developed with increase of traffic + pollution.

By protecting this local environment it will allow, both people and wildlife to continue to enjoy this peaceful haven.

REFERENCE

Comment No: DWLP-M- 137

Date Received: 12-12-18

ANTHONY BENNETT

WORTHING BOROUGH COUNCIL

PLANNING POLICY

PORTLAND HOUSE

44 RICHMOND RD

WORTHING BN11 1HS

10th DECEMBER 2018

Dear Sir or Madam,

Re: Draft Worthing local plan Policy SPS

It is of great concern to me as a Worthing resident that the green space known as the Goring/Ferring Goh is preserved in its present state, and that there be no hostility of building development. It is an important area for wild life and for many people a place of scenic enjoyment and a welcome break from urban sprawl.

Yours sincerely,

REFERENCE

Comment No: DWLP-M- 138

Date Received: 12-12-18

MR Peter ROBINSON

Dear Sir,

After reading your plans for working I feel I must comment. I totally agree with the plans to leave the Goring Gap as it is its important that wild life such as birds and bats are left to enjoy there habitat. I also agree that Brooklands should be left as a green gap.

I do however have objection to the redevelopment of HMRC offices my objection is not so much about the proposed houses but the destruction of the trees and bushes that run east to west at the end of Boringdon road as these have birds nesting and also bats the seven coppers that were posted by the residents of Walpole Avenue twenty to thirty years ago or what was told at the time by Working Council that they are on no man's land and we will be pushing to have a tree preservation order granted. The leisure centre seems to be a good idea but I would stress that infrastructure such as doctors surgeries and schools are a must as facilities at the moment are over stretched.

My other objection is the proposal for 96 new beach huts underland the playing of spaces. but we do like to see the sea

Yours faithfully

12/12
WORTHING BOROUGH COUNCIL
PLANNING POLICY
PORTLAND HOUSE
44 RICHMOND ROAD
WORTHING
BN 11 1HS
10/12/18

REFERENCE

Comment No: DWLP-M-139

Date Received: 12-12-18

Dear Madam/Sir,

DRAFT WORTHING PLAN RELATING
TO SP5 AND SP6.

I write in full support of the Draft Worthing
Local Plan which seeks to designate the Goring-
Ferring Gap and Chatsmore Farm as both a Local
Green Gap (SP5) and Local Green Space (SP6).

It is demonstrably clear from my point of view
as a local resident that the area under consideration
is highly valued by the various people that use
it throughout the year. The fact that people
flock here to partake ⁱⁿ and enjoy informal recreation,
the wildlife, the peace and quiet away from the
normal noise and buzz of everyday life and the
uninterrupted views towards the South Downs is
evidence of its unique value.

Spaces in this category (SP5 + SP6) are obviously
under pressure due to commercial encroachment and
I urge the Council to hold firm and designate
them as suggested.

Yours faithfully,

DAVID M BARLOW

Mr L. Glendon

REFERENCE

Comment No: DWLP-M-140

Date Received: 12/12/18

10th December 2018

Dear Sir/Madam

Garry - Ferry Gap + Chelmsmore Farm

I'm writing to you today to express my support for the council's proposal to make the above both a Local Green Gap (SGS) and a Local Green Space (SGS) under its double working Local Plan.

One of the reasons that my wife and I moved to the area was because of the lovely open spaces provided by Garry Gap + Chelmsmore Farm + the access we had to enjoy local wildlife + Birdlife. It also provides one of the best vantage points to look at the South Downs from the sea without the view being blocked by housing. It is in no doubt popular with the local residents and visitors to the area. This latter point supported by our own visitors who comment upon how lucky we are to live where we do.

P.F.O.

No doubt Roseman will periodically challenge these policies - but it is important that these are related. It would be so easy to grant a few spectacular views of the sea to the detriment of the many locals - and - local wildlife.
- Let's not even go to the "lack of housing" argument as Roseman would no doubt not be planning "affordable housing" on this site in anything other than a token manner.

So to reiterate - I support the proposal to make the Garry - Ferrying Crag and Chelsumore Farm both as a Local Green Crag (SP5) and Local Green Space (SP6).

Yours Faithfully



REFERENCE

Comment No: DWLP-M-141

Date Received: 12-12-18

9th December 2018

Dear Sir,
Worthing Local Plan: Policies SP5 and SP6 for both
the Goring-Ferring Gap and Chatsmore Farm

I write in strong support of the Local Plan which seeks to designate the Goring-Ferring Gap and Chatsmore Farm as both a Local Green Gap (SP5) and Local Green Space (SP6).

This afternoon, my husband and I walked along the Goring-Ferring Gap as we do most days. There were many others doing the same - families with small children, dog walkers of all ages and other couples and individuals enjoying the tranquility, glorious sunset and uninterrupted views towards the South Downs. The Gap is a vital space for wildlife with hedges, trees and open farmland providing a diverse habitat. These areas constitute vital green spaces and vistas supporting and enhancing the well-being of people and wildlife in Worthing and is a key attraction in the community and for visitors.

I am delighted that Worthing Council is seeking to preserve these unique areas in SP5 and SP6 on behalf of current and future residents and visitors and strongly support the application.

Yours faithfully,

REFERENCE

Comment No: DWLP-M-142

Date Received: 12-12-18

12th December 2018

Ref; SP5 and SP6

Dear Sir/Madam,

Regarding Goring-Ferring Gap and Chatsmore Farm

I have lived at the above address since 1991 because of its location, such a unique and treasured area.

With regards to the 400 Holm Oaks that is considered one of the finest in the world as noted on the poster along the coast, is this not to be cherished as heritage for Worthing and Arun, and not to be crammed in with any further redevelopment? Already much has been built around it, so what remaining land around it is essential to preserve not just now but for future generations. This is not just for the human population but for natural fauna, so vital for the birds with such a desperate decline in the bird population, again referring to the poster which notes at least 160 bird species and a feeding site for migrating birds.

I have observed over the years the flock of starlings gathering as well as many other birds over the farmland. Worthing Council has a serious responsibility to maintaining the eco system, on its own 'doorstep' and has been blessed with such rural heritage which must be preserved. Any development would be vandalism of the acutest kind!!

Worthing and Arun are responsible for an area of natural beauty, when looking up from the coast to the South Downs or gazing through the magnificent Ilex trees towards various vistas such as down to the coast.

If Worthing wants to bring people into the town for leisure which boosts the economy, especially with the nationwide decline in high street trading, it needs distinctive areas of interest which is certainly found in the Goring Gap.

Miss Lisa J G Kosznik

REFERENCE

Comment No: DWLP-M- 143

Date Received: 12-12-18

12th December 2018

Dear Sir or Madam

Goring-Ferring Gap and Chatsmore Farm identified for protection in the draft Worthing Local Plan.

We write to support the Council's draft Local Plan in respect of the above area and would be opposed to any housing development on it.

Goring Gap is one of the few open spaces between Bognor and Brighton which is a highly used and valued open space by the public with scenic views to Highdown Hill and the South Downs National Park.

It has a strong sense of place and local identity providing a clear boundary between Goring and Ferring, Adur and Arun.

Infill housing would eclipse this historical area and by its nature discourage ecological development and the protection of local footpaths.

It is a valuable space for the health and wellbeing of people who live and visit here.

With the views of the hills to the North and the sea to the South, it is a local beauty spot in its own right which deserves preserving.

Yours faithfully

Robert and Elizabeth Speller

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

REFERENCE

Comment No: DWLP-M-144

Date Received: 12-12-18

12/12

December 10th 2018.

Dear Sir/Madam,

re Waltham Local Plan -
Goring - Ferring Gap and Chatmore Farm.

It is my concern that the above areas should be protected from any development and for the above areas to continue as special being in a distinct well known for their of natural beauty and an asset to all visitors and local residents.

They need particular protection in view of their status and important geographical situation.

The areas are a tremendous asset to the town and the country. Once concrete and buildings are allowed to cover the land then all will be lost for thousands of years. The areas do offer much in terms of protection, the green spaces well known for their wildlife, peaceful recreation and scenic beauty.

Being a resident of Waltham since 1967 and Goring-by-Sea ⁽¹⁹⁸⁸⁾ I urge the local authority to protect the green spaces as specified in the local Waltham Plan.

Yours Faithfully,

The Chairperson,
Waltham Borough Council
Planning Policy
Waltham.

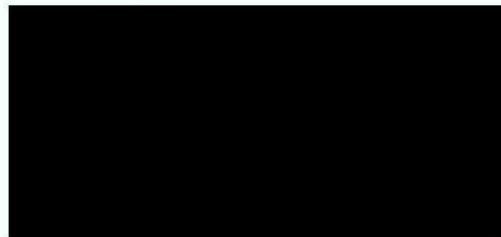
M. W. CHANCE

Worthing Borough Council
Planning Policy
Portland House
44 Richmond Rd
Worthing
BN11 ~~11~~

REFERENCE

Comment No: DWLP-M-145

Date Received: 13/12/18

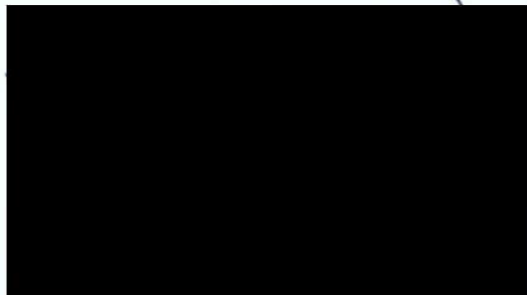


9/12/18

Dear Sir(s) Re: Objection

I am writing on behalf of my husband and I regarding, safeguarding the Going-Ferring Gap and Chatsmore Farm as both a local Green Gap and local Green Space being policies SPS and SP6. It would be a travesty, if houses are built within area, when so many people enjoy walking and taking little views as we do. We strongly object to any plans to challenge Policies SPS and SP6.

Yours faithfully



REFERENCE

Comment No: DWLP-M- 146

Date Received: 13-12-18

To Whom it May Concern,

Re. The Draft Working Local Plan.
re Persimmon challenges.

I have viewed the plans on line, and although they do not impede any view from my property, save in the distance, I have serious following concerns -

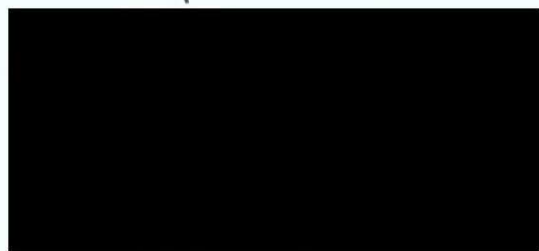
- 1) Unless extensive alterations were made to the existing roads, congestion would be unbearable, as it becomes worse daily now, especially at peak times
- 2) Drainage would have to be seriously improved as water run-off from tarmaced roads and driveways could cause flooding, especially where the Rife runs north of the railway line. Also in drought conditions, rainfall will not be able to fall on fields etc, causing the water table to fall.
- 3) Because the area has natural beauty - the only part of the coast for miles either way, we have visitors from inland who like to spend time in our beautiful area. The quality of life for them, and for local residents will be dramatically reduced alongside raised stress levels.

P.T.O.

4.) Finally - the area is full to capacity in services requirements - schools, doctors, dentists, etc. Any increase would cause them to implode.

We do hope that the Local Plan is upheld and that common sense prevails.

Yours faithfully-



MRS. C. A. COOKE

MR P. F. COOKE

REG 18 CONSULTATION OCT 31st – 12th Dec 2018

Representation

Name	Konstantinos Gallios
Organisation	Scotia Gas Networks Ltd (SGN)
Address	SGN, Axis House, 5 Loanhead Drive, Newbridge, Edinburgh, EH28 8TG
Email	Konstantinos.Gallios@sgn.co.uk

WLP Database	Yes
Newsletter	No

General comments

Thank you for your email asking for comments on the Proposed Worthing Draft Local Plan and its accompanying Sustainability Appraisal. SGN is preparing for the next Price Control Period (RIIO-GD2), due to commence 2021, and welcomes all input from Local Authorities that provides intelligence on proposed development within their respective areas. This information will assist us in identifying potential growth and associated reinforcement requirements.

SGN has carried out a high level assessment of the impact of developments contained within the Development and Site Allocations Local Plan ("DaSA") and the accompanying Sustainability Appraisal documents and can comment as follows:

NETWORK OVERVIEW

SGN's network within Worthing area is energized by the South Local Transmission System (LTS) with and supported by the integrated IPMP system. Transmission Regulator Stations (TRS) are located across the center of the region, reducing pressure to the High Pressure (HP) Intermediate (IP) and Medium (MP) pressure systems. In some instances pressure is reduced from IP to MP by means of District Pressure Governors (DPG). In turn, the IP/MP systems are further broken down to Low Pressure (LP) systems directly supplying the majority of existing domestic customers.

STRATEGIC DEVELOPMENT AREAS

We have assessed our infrastructure and do not envisage any issues in general, however specific connection locations may require localized reinforcement. There is no new reinforcement required from the latest local plan or sites which may have significant impact, compared to the potential existing ones. SGN's infrastructure will not be severely affected from the additional developments described on the latest summarized local plan.

Below is a short synopsis of the networks supplying these areas where reinforcement will may be required in the medium and long term.

For the Worthing district, reinforcement of the IP/MP Grid will be required, if gas is to play a major role in meeting the energy requirements of any potential developments identified in the local plans. If said developments are phased as set out in the various LDPs, then the reinforcements will be necessary in ensuring that security of supply is maintained. It is of paramount importance to stress that the timelines and capacities that are quoted in the various LDP documents are not concrete and are, therefore, subject to change such as the reinforcements accompanying them .

STATUTORY OBLIGATIONS

Where required, SGN will look to manage the provision of any off site infrastructure improvements, in line with the overall development growth and/ or timescales provided. The full extent of these works will be dependent on the nature and location of the requested load(s), potentially requiring LP reinforcement in addition to that required for IPMP networks, and will only become clear once a developer's request has been received. Reinforcement solutions are likely to involve the provision of a new pipeline in parallel to SGN's existing mains system, but may also include the installation of above ground apparatus involving land purchase.

As this is a high level assessment and response, the information provided is indicative only and should be used as a guide to assist you on your assessment. While information obtained through consultation and / or engagement on Local Development Plans is important to our analysis, it only acts to identify potential development areas. Our principle statutory obligations relevant to the department of our gas network arise from the Gas Act 1986 (as amended), an extract of which is given below:-

Section 9 (1) and (2) which provides that:

9. General powers and duties

- (1) It shall be the duty of a gas transporter as respects each authorized area of his:-***
(a) to develop and maintain an efficient and economical pipe-line system for the conveyance of gas; and
(b) subject to paragraph (a) above, to comply, so far as it is economical to do so, with any reasonable request for him -
(i.) to connect to that system, and convey gas by means of that system to, any premises; or
(ii.) to connect to that system a pipe-line system operated by an authorized transporter.
- (1A) It shall also be the duty of a gas transporter to facilitate competition in the supply of gas.***
- (2) It shall also be the duty of a gas transporter to avoid any undue preference or undue discrimination -***
(a) in the connection of premises or a pipe-line system operated by an authorized transporter to any pipe-line system operated by him; and in the terms of which he undertakes the conveyance of gas by means of such a system.

SGN would not, therefore, develop firm extension or reinforcement proposals until we are in receipt of confirmed developer requests.

As SGN is the owner and operator of significant gas infrastructure within the Worthing area and due to license holder obligations;

- Should alterations to existing assets be required to allow development to proceed, such alterations will require to be funded by a developer.

- Should major alterations or diversions to such infrastructure be required to allow development to proceed, this could have a significant time constraint on development and, as such, any diversion requirements should be established early in the detailed planning process.

SGN would therefore request that, where the Council are in discussions with developers via the Local Plan, early notification requirements are highlighted.

Additionally, SGN are aware of the advances being made in renewable technologies, especially those related to the production of biomethane. Should any developer be proposing to include such technology within their development, then we would highlight the benefits of locating these facilities near existing gas infrastructure. Again, where the Council are in discussions with developers via the Local Plan, we would hope that these early notifications requirements are highlighted.

Please let me know if the above information is sufficient for your requirements at present.

REFERENCE

Comment No: DWLP-M-148

Date Received: 17/12/18

9th December, 2018

Dear Council,

Regarding your plans for Chatsmore Farm (Goring Gap North and South) - SP5 & SP6-LP pages 25-37, I welcome the decision to spare these areas from development and to maintain the Gap between Goring and Ferring.

I also agree Brooklands (SP5 & 6-LP-pages 25-37) being kept as a green space. Keeping these green spaces is important in providing gaps in the conurbation that the coastal strip from Brighton to Littlehampton is becoming.

I'm not sure about the plans being made for the HMRC offices, Mastletts Way or the

Leisure Centre (AOC5-LP pages 68 & 69; AOC6-LP pages 70-71 and AOC4-LP pages 66-67) as any new residential properties increase the volume of traffic which, at times, is near gridlock even now. This with the obvious pollution it causes is completely spoiling what was once a nice place to live and a nice seaside town for visitors.

Please would you bear this in mind when you make your plans.

Yours faithfully

 (Mrs)

Cllr. Kevin Jenkins
WBC cabinet member for regeneration
Worthing Borough Council
Town Hall
Chapel Road
WORTHING BN11 1HA.

REFERENCE

Comment No: DWLP-M-149

Date Received: 11/12/18

1st December 2018

Dear Cllr. Jenkins:

"Have your say on vision for town's future development"

Having read the above article published in the Worthing Herald 8th November, I had wanted to get along to one of the "drop-in" events which took place in the Town Hall but, unfortunately, was unable to.

Back in August, I wrote to the council leader - Daniel Humphreys - and others about global warming and included an article from the New Scientist "We must build for a warmer future" - please see enclosed. I enclose related correspondence which conveys my thinking.

In light of the IPCC's Special Report 8th October and subsequent report from the government's own advisory body, the Committee on Climate Change, dated 26th October, which includes a coastal impact assessment - see enclosed - I very much hope all development plans will be subject to review to take account of a rapidly changing climate scenario, as drawn attention to in my letter to Cllr. Bob Smytherman 12th November - copy enclosed.

Yours sincerely,

Robert Margrett

Worthing Climate Action Network

copies to:

Encls: letter to Cllr. Humphreys 7/8/16

" " " " 14/8/16

" " " " et al. 9/8/18

attachment - New Scientist 4/8/18 "We must build
for a warmer future"

letter to Cllr. Humphreys et al. 15/8/18

attachment - Scientific American 8/18 "Under Water"

letter from Andy Willems, Head of Place & Economy, Adur
& Worthing Councils 14/8/18

letter from James Appleton, Head of Planning and
Development, Adur & Worthing Councils 21/8/18

The Committee on Climate Change: report 26/10/18 -

"Current approach to protecting England's coastal
communities from flooding and erosion not fit
for purpose as the climate changes"

letter to Cllr. Smytheman 12/11/18

—
Cllr Daniel Humphreys
Leader Worthing Borough Council
Worthing Borough Council
Town Hall
Chapel Road
WORTHING BN11 1HA.

1th August 2016

Dear Cllr Humphreys:

Regarding Terville Gate, Union Place and the Arcade may I offer the following ideas.

Terville Gate: developed as a very large multi-storey car park and to incorporate residential flats, small shopping area and a free electric bus shuttle service between it and South Street bus stop.

Union Place: turned into a park — a green oasis — Worthing's very own "central park".

The Arcade/Montage Centre; rather than fell mature trees, creatively incorporate these into the shopping and leisure experience by having a high atrium constructed over this end of the Centre.

I am enclosing three articles relevant to my concerns. Regarding Union Place, not only should you consider the relocation of the retail offering impacting on other areas to their detriment, — the loss of the multiplex — so I am lead to understand —

is possibly on the way - but, in any event, this poses a problem of financial viability for Worthing's other cinemas.

As for money: both Terville Gate and the Arcade developments should help finance Worthing's 'Centon Park' and the two, three or four buses required for the shuttle service, the ^{cost} running, of which could be more than covered by revenues from car parking charges. And such proposals may, if needed, help raise money from business/investment houses.

More shops, if they are needed - which I doubt - the Guildbourne Centre remains an opportunity for an exciting refurbishment or deconstruction to provide a (demanded) purpose.

Thank you for taking the time to read my letter and I hope my ideas give food for thought.

Yours sincerely,

Robert Margrett

(a frequent visitor to Worthing)

encls: Worthing Herald 7.7.16
pg 4 "Urban Place", pg 5 "Trees"
The Guardian 25.7.16
"Retail Space"

Cllr. Daniel Humphreys
Leader Worthing Borough Council
Town Hall
WORTHING BN11 1HA.

14th August 2016

Dear Cllr. Humphreys:

Following on from my letter of the 7th August to you, I see in this week's Worthing Herald on pages 3 and 5, details of store closures in the town: Store Twenty One on Chapel Road and BHS on Montague Street.

I really do think the formula of sizeable retail developments and building on every last piece of available space in Worthing is not the right one, and will not deliver the relaxed and pleasing ambience that creates an attractiveness for residents and visitors alike which will benefit businesses as a result.

As a seaside town, you will be aware this presents a particular problem for Worthing in the near future. It is quite likely that by as soon as mid-century, coastal settlements will be having to re-think shore-line developments and look at remedial measures to protect or remove some buildings towards the latter part of this century. Perhaps, it is not premature for these matters to be borne in mind when considering new shore-line developments today and their expected longevity.

The government's Climate Change Committee has just presented the government with a 2000 page document

... setting out the challenges we all face — I am enclosing a report from the press on the committee's findings, it makes for salutary reading.

As before, many thanks for giving my letter your attention.

Yours sincerely,

Robert Margrett

Encl: the Guardian 18th July 2016

"Warning on climate: UK not ready for heat, floods and disease"

Cllr Daniel Humphreys - Leader WBC
Andy Willemms - Investment Officer WBC
James Appleton - CEO Coastal Design Panel WBC
WSCC Project Manager - public realms works

Dear All:

Regarding Public Realm Options for
Workington and other development considerations
for the town, I thought you would find the
enclosed article (published in the New Scientist
4th August) of interest - "We must build for
a warmer future".

Yours truly,

Robert Margrett

Encl: "We must build for a warmer future"
New Scientist 4/8/18 pgs. 18 & 19

9.8.18

We must build for a warmer future

Badly designed homes make heatwaves worse, says Michael Le Page

TEMPERATURES have been soaring in much of the northern hemisphere recently (see page 5). In southern parts of the UK, they have been pushing 30°C for weeks, and health warnings about the heatwave have been flying. That has attracted some derision from those living in hotter places, such as the city of Darwin in Australia. "In Darwin that's called winter," was one mocking response.

Yes, it gets much hotter elsewhere. But hot places are geared up to cope with heat. By contrast, when temperatures soar in normally cooler cities like London, people commute on crowded trains that breach temperature limits for transporting livestock, work in buildings with limited cooling systems and struggle to sleep in stuffy houses designed for cold winters.

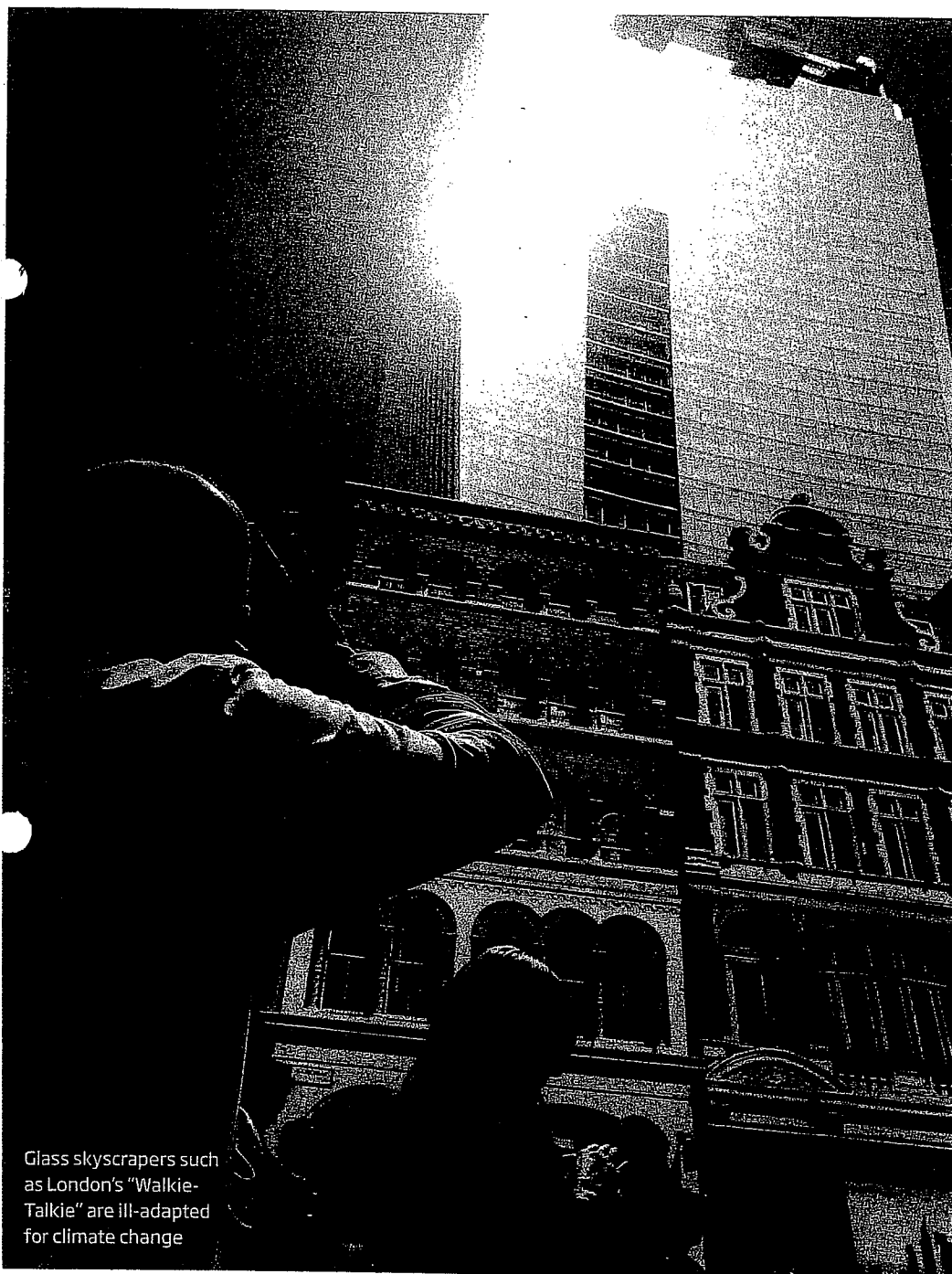
Hot summers will soon be the norm in temperature climes because of climate change. So unless more is done to adapt buildings and transport systems to the heat, summers are going to become ever more miserable for millions – and ever more deadly to young, ill and old people.

Preventable deaths

"Without further action, the number of heat-related deaths could increase from 2000 per year today to 7000 in the 2050s," says Kathryn Brown, head of adaptation at the UK Committee on Climate Change.

If a flood killed that many people, there would be a massive outcry, says Bob Ward of the Grantham Research Institute on Climate Change in the UK. "It's a scandal that hundreds of people are dying," he says. "Many of those are preventable deaths."

A report published last week by the UK's Environmental Audit Committee says the problem is so serious that the country should have a dedicated government minister to tackle the issue. But what can be done?



Glass skyscrapers such as London's "Walkie-Talkie" are ill-adapted for climate change

RICHARD BAKER/GETTY

Countries like the UK are simply not doing enough to fix buildings that are poorly designed for staying cool in hot summers. Worse still, new buildings are being designed in such a way that they require vast amounts of energy to cool. It is more than just a matter of comfort. High temperatures reduce the productivity of workers and affect how well children learn, lowering exam scores with potentially life-long impacts.

Countries must do three things to protect their citizens' lives and livelihoods. First, existing infrastructure – from homes and hospitals to schools, offices and trains – needs to be modified to cope with the extremes expected as the planet warms, including longer and hotter heatwaves. Second, new buildings and transport systems need to be designed with future heatwaves in mind. Third, cities as a whole need to minimise the “urban heat island” effect that can boost local temperatures by several degrees.

We can keep buildings cool by actively removing excess heat – air conditioning, in other words. We can also stop them getting too hot in the first place. Needless to say, prevention is better than cure.

The problem with air conditioning is that it produces yet more heat. A study in Paris concluded that air conditioning could warm the city by as much as an extra 2°C. It is also expensive to install and run, because air conditioners use a lot of energy.

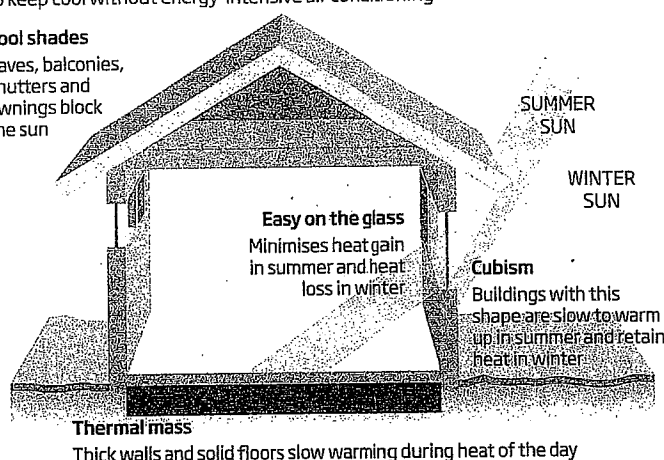
In fact, 10 per cent of electricity globally is used to power air conditioners and this is expected to soar as the world gets hotter and more people can afford air con, according to a recent International Energy Agency report. That is a huge problem, because most electricity is still generated from fossil fuels. In other words, the more air conditioning we use, the hotter the planet will become.

The focus, then, should be on creating buildings that can stay warm in winter and cool in summer. Architects and planners

Building smarter homes would help people living at mid- and high-latitudes to keep cool without energy-intensive air conditioning

Cool shades

Eaves, balconies, shutters and awnings block the sun



don't seem to have realised this, says eco-designer Sue Roaf, co-author of the book *Adapting Buildings and Cities for Climate Change*. “They just don't get it.”

Current architectural crazes are for lightweight glass buildings that would become unbearably hot without energy-intensive air conditioning systems. Roaf lives in an eco-house with a much more sensible approach.

The first step is to think about the shape of the building, and the size and placement of windows, in relation to the path of the sun. The basic idea is to find ways to minimise the amount of sunshine entering windows in summer but maximise it in winter, such as through long roof eaves (see diagram, above).

Besides good insulation to keep the heat out, buildings should be slow to warm up. That means having a high thermal mass, such as thick walls made of a dense material, or sinking the building into the ground. It should also be possible to get a good air flow through the house at night – for instance, by having windows that can be left wide open without compromising security.

All this means we should be building relatively low-rise, cube-shaped buildings with thick walls and few windows on the sunny side. That is pretty much the opposite of what is being done.

Designer homes often feature wall-to-ceiling windows, and most new office buildings are all-glass skyscrapers with no shading and sealed windows.

Glass is very energy inefficient – it leaks heat in the winter, and soaks it up in the summer. The bottom line is that people who live in a warming world should not build glass houses. “It's a no-brainer,” says Roaf.

“The bottom line is that people who live in a warming world should not build glass houses”

So why have we fallen into this glass trap? Partly, it is a matter of culture. Glass is fashionable, and most architects don't understand that buildings need to be designed differently in a world facing catastrophic global warming.

Although that is starting to change, Roaf says, much of the focus has been on energy efficiency. So if engineers design a cooling system for a building that requires less energy, it is hailed as a “green” building. Few are trying to create buildings that don't need cooling systems in the first place.

To tackle this, governments must introduce building standards that force designers to create truly green buildings. But nothing is being done in the UK, warns the Environmental

Audit Committee. “The government should recognise the importance of protecting public health by introducing building regulations to stop new buildings overheating,” says its report.

Can badly designed buildings be fixed? With skyscrapers, there is often little that can be done, but with smaller buildings and houses there is often scope for making them cooler without resorting to air conditioning. The first thing is obviously to insulate them – but the UK has abandoned insulation schemes and rates of its installation have plummeted. The next thing is to stop the 500 watts of heat per square metre you get when sun shines in through a window, says Roland Ennos at the University of Hull.

Drawing curtains will help a bit, but it is better to stop the sunshine getting through in the first place. This can be done by installing external shutters, awnings or pergolas, or by planting trees or climbers to shade the exterior.

Authorities also need to look at the big picture. The urban heat island effect can warm cities like London by as much as an extra 7°C. But measures like tree planting can drop urban temperatures by several degrees, reducing the need for cooling city-wide and making such places more pleasant.

For buildings that do need cooling, there are greener alternatives to air conditioners. For instance, ground-source heat pumps that warm buildings in winter can be reversed in summer to cool them. But these systems are expensive and won't be affordable for everyone.

We need to be doing all these things and more to adapt our homes and cities to a world of ever more extreme weather. Introducing better standards for new buildings is especially urgent, because these buildings could be around for centuries. If they are not fit for purpose, we will all pay the price. Or as Roaf puts it: “The government has to wake up and smell the coffins.” □

Clk. Daniel Humphreys - Leader WBC

James Appleton - CEO Coastal Design Panel WBC

Jane Moseley - Mgr. County Planning Services WSCC

Glen Westmore - Local Flood Risk Management Strategy
Environment Agency WSCC

15/8/18

Please find enclosed a report "Under Water" published in this month's Scientific American, which describes how some coastal communities in New Jersey are dealing with rising seas and flooding. On pages 44 & 45 - "The Models Scientists Have Made..." - the report looks at the global challenge of trying to understand how quickly and by how much sea levels are going to rise.

Yours Sincerely

Robert Margrett

Encl: "Under Water" Scientific American August 2018 p364
for Jane Moseley: letter to WBC & WSCC 9/8/18 re
(Working) Public Realm Options with New Scientist
4/8/18 article "We must build for a warmer future"

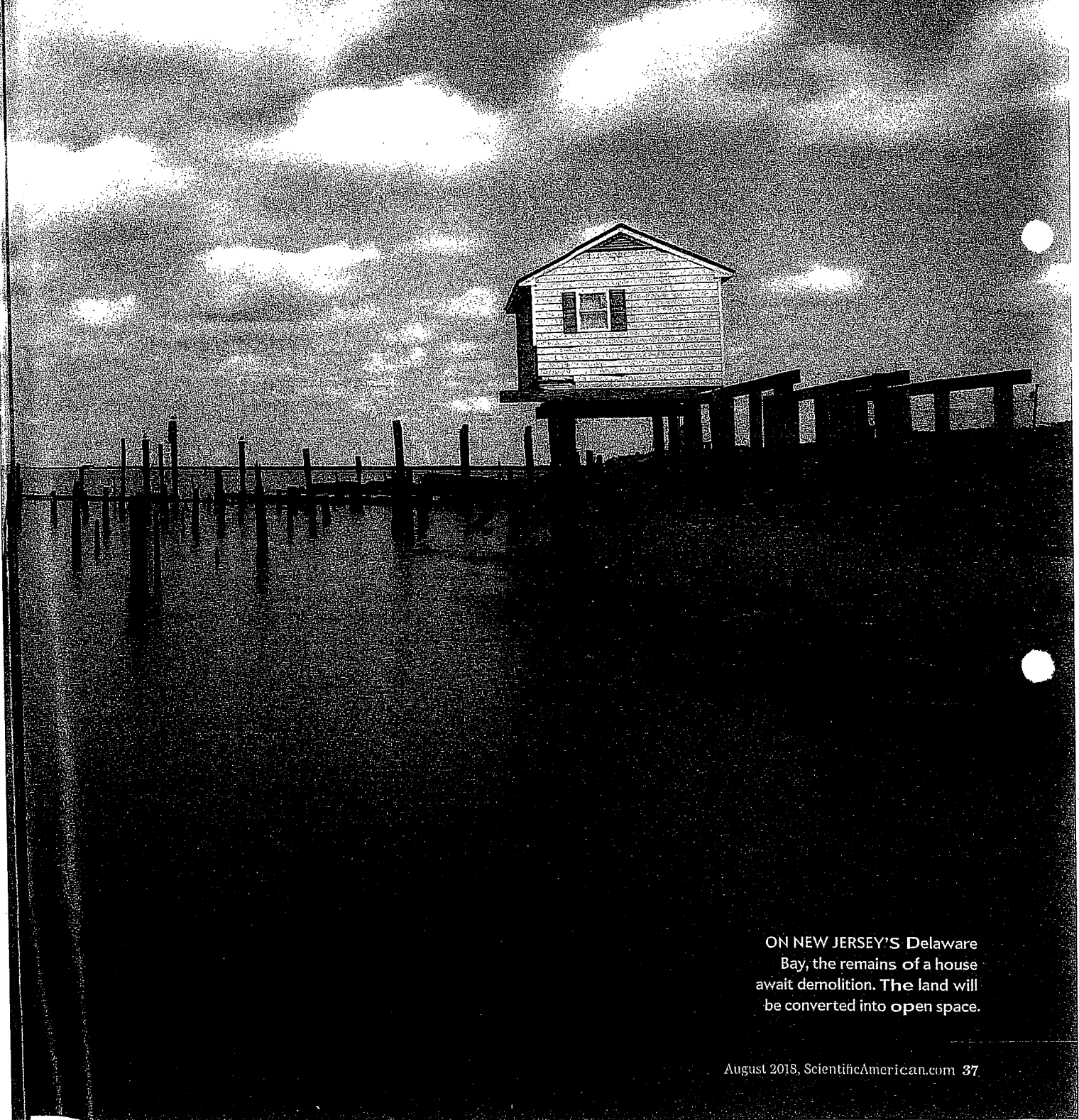
UNDER

Coastal communities
struggling to adapt
to rising seas are
beginning to do
what was once
unthinkable: retreat

By Jen Schwartz

Photographs by Grant Delin

WATER



ON NEW JERSEY'S Delaware Bay, the remains of a house await demolition. The land will be converted into open space.

August 2018, ScientificAmerican.com 37

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ONIQUE COLEMAN'S basement was still wet with saltwater when the rallying began. Just days after Superstorm Sandy churned into the mid-Atlantic region, pushing a record-breaking surge into the country's most densely populated corridor, the governor of New Jersey promised to put the sand back on the beaches.

The "build it back stronger" sentiment never resonated with Coleman, who lived not on the state's iconic barrier islands but in a suburban tidal floodplain bisected by 12 lanes of interstate highway. Sandy was being billed as an unusual "Frankenstorm," a one-in-500-year hurricane that also dropped feet of snow. But for Coleman and many residents of the Watson-Crampton neighborhood in Woodbridge Township, the disaster marked the third time their houses had been inundated by floodwaters in just three years. Taxed by the repetitive assault of hydrodynamic pressure, some foundations had collapsed.

As evacuees returned home for another round of sump pumps and mold, Coleman considered her options. Woodbridge sits in the pinched waist of New Jersey, where a network of rivers and creeks drain to the Raritan Bay and then to the Atlantic Ocean. She heard that the Army Corps of Engineers wouldn't be coming to build a berm or tide gate; the area had recently been evaluated, and such costly protections seemed unlikely. Spurred by previous storms, Coleman had already learned a bit about the ecological history of her nearly 350-year-old township. She discovered that parts of her neighborhood, like many chunks of this region, were developed atop low-lying wetlands, which had been elevated with poorly draining "fill" back around the early 20th century. As Coleman researched more deeply, a bigger picture emerged. "I started to realize that, in a sense, we were victims of a system because we were living in a neighborhood that should have never been built," she says.

Although she had flood insurance—her mortgage required it—Coleman knew that her premiums would soon go up, and she worried that her property value would go down. She and

her husband liked their house, a prewar colonial. Best of all, it was affordable, a rare find in a town so close to New York City. Coleman had only discovered she would be living in a "special flood hazard area" once she was reading the closing paperwork in 2006. That made her nervous. She recalls her attorney waving it off by saying that at the rate we're going, everyone in New Jersey will live in a floodplain. That might be true in spirit, as a future-looking thought experiment, but it was severely misleading given the circumstances. Desperate to move her family away from a block in Newark with increasing drug activity, Coleman signed away one type of risk for another.

For four uneventful years, the marsh near the bottom of her street was an attractive amenity, a place where her three young sons could play freely. Then the drainages that wrapped around her neighborhood like a wishbone were overwhelmed by a nor'easter in 2010. And by Hurricane Irene in 2011. And again, by Sandy, in 2012.

When federal recovery money started trickling into New Jersey after Sandy, Coleman learned that she could apply for an elevation grant. But raising her house on stilts seemed silly if her car and the road were still on the ground. During Irene, she had witnessed what happens during a storm surge. "The high tide rushes in, and water envelops the entire area in no time at all," she says. "The street becomes a river within a river." Coleman didn't want to be "made whole," in the parlance of disaster-recovery law, if it meant rebuilding in place. Her stress levels spiked every time it rained during high tide. She didn't feel safe, physically or financially.

While commiserating with a neighbor, Coleman heard about a program called Blue Acres. Its premise struck her as radically sensible: The government would "buy out" her repeatedly flooded property at its prestorm value instead of paying to repair it yet again. Demolition crews would then knock down the house and remove other markers of human habitation. She would transfer the deed to the state, and redevelopment would be blocked, forever.

Compared with selling her house, this process seemed overwhelming. But even if she could find a willing buyer, how could she ethically transfer this vulnerability to someone else? "All of us who live in high-risk flood zones were taken advantage of somewhere along the line," Coleman says. "This was a way to end that cycle."

Jen Schwartz is a senior editor at *Scientific American* who writes about the intersection of science and society.

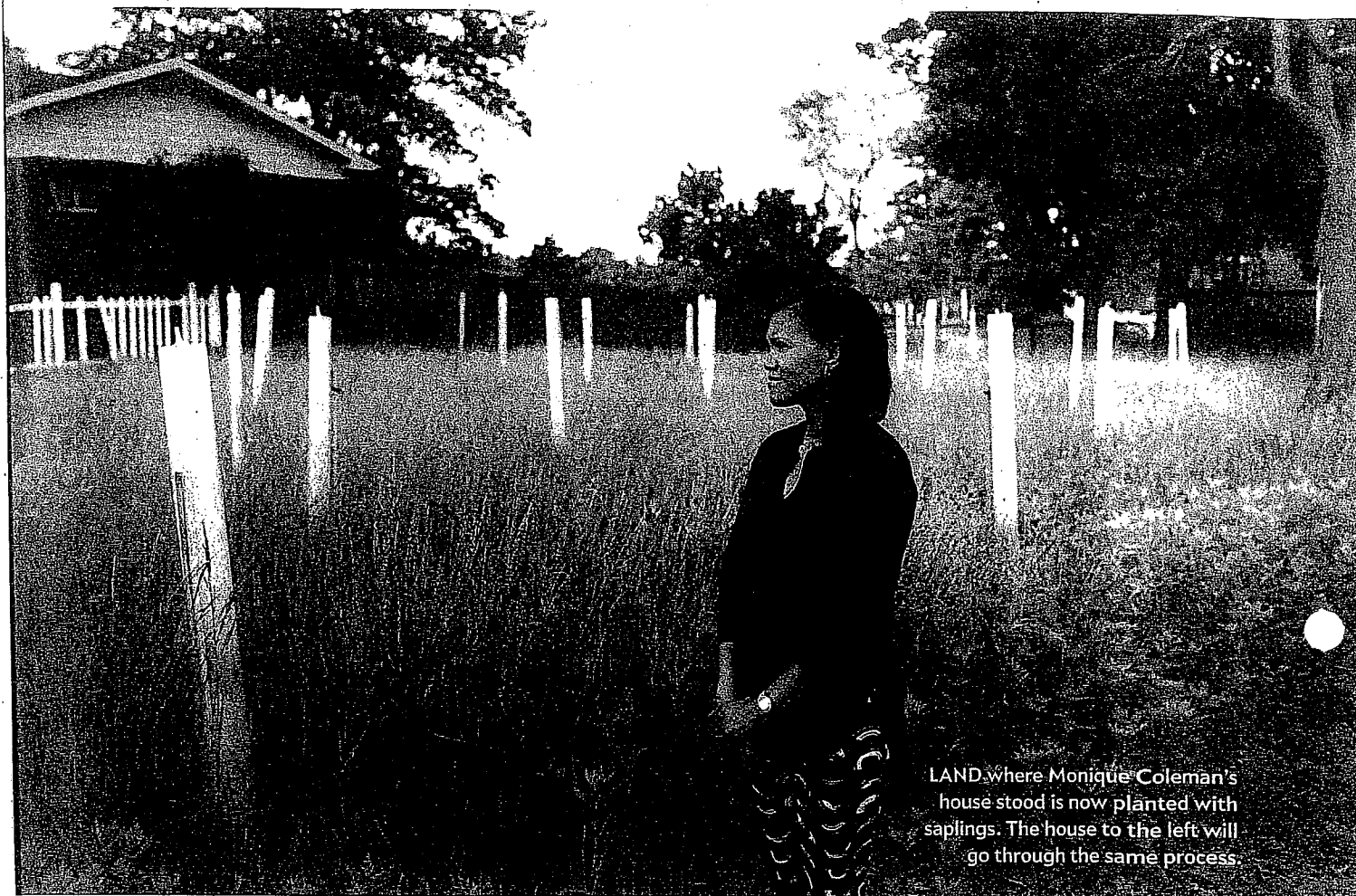


IN BRIEF

As sea levels rise, some coastal communities are confronting a future of both chronic and extreme flooding. Retreat—permanently moving people and property away from the water—is radical, but in some places, it is inevitable.

Even well-managed retreat is messy and painful. It has rarely been tried at all. One New Jersey town is experimenting with moving a cluster of people out of harm's way and turning the newly open land into a flood buffer to protect the rest of the community.

Planning for how and when communities will need to retreat involves many variables. New Jersey could see up to 12 feet of sea-level rise by 2100. Social, political and economic factors add to the complexity.



LAND where Monique Coleman's house stood is now planted with saplings. The house to the left will go through the same process.

RETREATING FROM THE COASTS, in concept or practice, is not popular. Why would people abandon their community, the thinking goes, unless no better alternatives remained? To emergency responders, retreat is a form of flood mitigation. To environmental advocates, it's ecological restoration. To resilience planners, it's adaptation to climate change. Everyone agrees, however, that retreat sounds like defeat. It means admitting that humans have lost and that the water has won. "American political institutions, even our national mythology, are ill-suited to the indeterminacy and elasticity of nature," wrote journalist Cornelia Dean nearly two decades ago in her book *Against the Tide*. "It would almost be un-American to concede ... that it is we who must adapt to the ocean, not the other way around."

The U.S. has occasionally experimented with retreat on a tiny scale by offering voluntary buyouts to waterlogged families. The outcome is rarely promising. "Buyouts are extremely expensive, extremely disruptive, and many of the attempts have not gone well," says Craig Fugate, former administrator of the Federal Emergency Management Agency (FEMA). They invoke fear among citizens in every political stratum, bringing to mind land grabs, racist resettlement projects, class warfare, and, depending on your ideology, either federal overreach or federal abandonment. Because they require coordination among politicians, homeowners, lawyers, engineers, banks, insurers and all levels of gov-

ernment, they are enormously complicated to execute, even poorly. At their worst, buyouts break up community support systems, entrench inequality and leave a checkerboard of blighted lots in their wake. At their best, they avoid these things and still displace people from their homes.

Yet anyone who has looked at a map that forecasts sea-level rise can see that in low-lying neighborhoods exposed to the tides, some amount of retreat is inevitable. Regardless of how much and how quickly humans cut greenhouse gas emissions, climate change is already producing effects that cannot be reversed. Within a few decades, as saltwater begins to regularly block roads, kill wetlands, disrupt power supplies, bury popular beaches, undermine houses and turn common rainstorms into perilous floods, the most vulnerable pockets of coastal towns will become uninhabitable. As the National Oceanic and Atmospheric Administration has warned, "today's flood is tomorrow's high tide."

Buyouts, however, are not designed for adapting to climate change. Past beneficiaries were almost exclusively riverine communities in the U.S.'s rural interior—people who lived too close to the overflowing Mississippi and Red rivers, for instance, were relocated nearby. The government didn't even begin promoting buyouts as a form of disaster recovery until the 1990s, and since then, they have been conducted as one-off reactions to hurricanes. With multiple federal agencies involved, yet no one tak-

FAWN MCGEE, director of the Blue Acres Buyout Program, has purchased hundreds of houses in New Jersey, including this one. It will soon be demolished.



ing charge, "it's amazing how much we're still making this up as we go," says Alex Greer, an expert in disaster science at Oklahoma State University. Until recently, retreating from the coasts was practically unheard of.

Superstorm Sandy changed that. The hurricane made sea-level rise, an abstract, future problem for far-flung places, manifest in the form of drowned subway lines and a roller coaster tossed into the waves. It communicated both the experience and evidence of future flooding in a way that probabilities never could. "It's Global Warming, Stupid," said the cover of *Bloomberg Businessweek*. Political leaders in New York State and New Jersey, sensing a tonal shift, realized they couldn't just talk about rebuilding without also talking about resiliency, the rising buzzword of disaster preparedness.

Environmental types were also acknowledging that they could no longer fixate solely on the problem of carbon emissions. Rob Moore was executive director of the Environmental Advocates of New York back in 2012. "We didn't want to talk about adaptation, because we saw it as a distraction from mitigating climate change," he says. "But Sandy made it unavoidable." A few months later Moore took a job at the Natural Resources Defense Council (NRDC) to work on how the country would cope with rising seas. Climate scientists who study the acceleration of sea-level rise felt a similar urgency, and many emerged from their silos to produce better projections. "Now the geophysical people are talking to the atmospheric people and to the economists and the sociologists," says Robert E. Kopp, director of the Institute of Earth, Ocean, and Atmospheric Sciences at Rutgers University and

a lead author on major climate reports. This interdisciplinary approach has led to localized forecasting. Instead of only one number—the global mean—we now know that sea-level rise will vary significantly from region to region.

As flooding worsens, a few massive seawalls will likely be built to protect densely populated economic centers, such as lower Manhattan. But there is only so much money, and time, for cement enclosures. Residents in places such as Tangier Island in Virginia and Isle de Jean Charles in Louisiana—and globally from Bangladesh to the Maldives to Senegal—are coping with the same reality as Coleman and her neighbors in Woodbridge Township: a wall isn't coming to save them, and the floods are already here.

NEW JERSEY'S CHIEF OF LAND ACQUISITION clasps her hands on the approach to Bay Point, a peninsula that is disappearing into the Delaware Bay. This is the site of the state's first beach-front buyout, a hard-won success for Fawn McGee. Of the 31 properties she has acquired here, most were recently demolished. Some of the houses were already long gone, leaving behind skeletons of whittled pilings repurposed by nesting ospreys. "It's bittersweet," says McGee from atop a mound of makeshift riprap, residents' last-ditch attempt to stop the erosion. "Even when you can be excited that we bought all these homes, and now we're going to restore the land, everybody is miserable that they had to leave."

When it comes to the unsustainable development of the American coastline, New Jersey owns the honor of being the first and worst. It was here that the tempestuous beach environment

long feared and avoided until industrial times, was rebranded as a summer vacationland. Atlantic City and Cape May were tourist destinations by the mid-1800s, escapes from the undignified swelter and infectious diseases of Philadelphia. The Lenape people had long done the same—a seasonal migration to the shore—but they came to fish, not to conquer the sand with an arsenal of hotels and boardwalks. To hold everything in place, New Jersey was the first state to try to wrest control of coastal sediment flows from nature by erecting seawalls and jetties and bulkheads, and today virtually none of its coastline is untouched by human intervention. It's no surprise that the first speculator to see dollar signs on the sandbar that became Miami Beach was a New Jerseyan.

For the communities McGee works with, retreat has gone from a strategy of last resort to the only option left in the span of about a decade. Climate change drove that shift. But the reason people are in this predicament in the first place is because of the unchecked hubris of coastal engineering, coupled with general human tendencies to love the water and ignore the future. The government gave a huge boost to coastal development in 1968 by introducing the National Flood Insurance Program—an exemplar of moral hazard that allowed homeowners to rebuild over and over in risky areas while keeping their premiums artificially low. Fifty years later that program has accumulated \$36.5 billion of debt while effectively trapping people who might prefer to escape to higher ground, NRDC's Moore explains.

Coastal systems, by their tidal nature, are always dynamic and occasionally volatile. The harder we tried to make them stay put, the less stable they became. In the 1960s, when scientists discovered that beaches armored with hard structures actually eroded faster and recovered slower than natural ones, the Army Corps of Engineers began dredging sand from the continental shelf and pumping it back to the shore. Before long, a storm would wash it away, and the dredging would begin anew. Today the Eastern seaboard has a Sisyphean dependence on the "nourishment" cycle. As sea-level rise rapidly accelerates, beach towns are increasingly desperate for fresh infusions of sand, which the corps must travel farther offshore to find. Geologists warn that we are running out of usable sediment faster than the planet can replace it. Wealthy homeowners in Florida are now stealing sand from public beaches to fill in their private ones.

Just as New Jersey pioneered the quixotic development of the coasts, it is leading an acceptance of what it wrought. Twenty-three years ago the state's Department of Environmental Protection (NJDEP) launched the Blue Acres Buyout Program, using state money to purchase a handful of routinely flooded houses here and there. McGee, who runs the program now, was its first leader to leverage federal money from FEMA and other agencies, turning Blue Acres into one of the country's very few standing buyout departments to deal with rising tides. Florida and Louisiana don't even have their own versions. Blue Acres, McGee says, has three major goals: permanently move people and property out of harm's way; open the land for public access; and restore the natural ecology so that the ground becomes a sponge, mitigating flood risk for the rest of the community.

After Superstorm Sandy, McGee prioritized buyout eligibility for entire clusters of houses over individual ones. In that way, the open space created would be big enough to have a real impact on managing floods. She looked for towns based on where enough homeowners had expressed interest in the process *and*

the local government was willing to part with a portion of its tax base. After all, when the houses disappear, so, too, goes the tax contribution. Homeowner participation is voluntary, with an ability to pull out at any stage before signing the final contract. That means that families in a "buyout zone" will ultimately have to make a profoundly personal decision about whether or not to uproot in the context of both their neighbors' choices and their town's vision for the future.

The year before Superstorm Sandy, McGee tried pulling off her first large round of buyouts in the aftermath of Hurricane Irene. It didn't go well. "On paper, buyouts make a world of sense, but in practice, that is absolutely not true," Greer, the disaster scientist, says. McGee scrutinized how the process got disjointed and stalled out, making it nearly impossible for anyone to make decisions. It took more than a year for the funding to align, leaving desperate homeowners in a lurch. Some people were upside down on their mortgages, which disqualified them from the program. Or they couldn't afford to keep living in temporary housing while waiting for answers. As disaster amnesia began to set in, many decided just to pursue the readily available methods of rebuilding or elevating. "I realized this went way beyond land acquisition," McGee says. She tasked her tiny Blue Acres team with anticipating the adjacent challenges. "When Sandy hit and the big federal money came in, we were ready," she says.

But advocating for large buyouts of clustered properties meant McGee was pushing for something novel at a moment when New Jersey was in triage mode. The state administration wanted to recover as quickly as possible. "I think they looked at me as a troublemaker for challenging us to think beyond black-and-white," she says. McGee was arguing to disrupt the cycle of hasty rebuilding in areas where she knew the water would rise again. After many persistent meetings (her approach was "confidence, not confrontation," she says) and assurances that she could navigate through the bureaucracy, McGee convinced the state to give her plan the go-ahead.

Immediately McGee asked to borrow 33 staffers from other areas of the NJDEP. "In addition to my GIS [geographical information system] people, I brought in four paralegals, six project managers to do grant writing and deal with the feds, and eight case managers to walk families through the process," she says. "Then title people. Appraisers. Surveyors. Accountants. We had bookkeepers just to go through shoeboxes of Home Depot receipts from homeowners and cross off things like Snickers bar, water, couch." With each snag that threatened the buyouts, McGee found herself filling some unexpected role. She played a therapist to storm victims experiencing trauma, illness and divorce. When McGee saw how many homeowners were upside down on their mortgages, she facilitated short sales that amounted to more than \$5.4 million of debt forgiveness—which resulted in 67 additional bought-out homes. When the issues went beyond her scope, she outsourced: "Hoarders! They literally can't get out of their houses," she says. "We had to bring in specialists to help them let go of their stuff."

Most important, McGee sensed that buyouts were a deeply communal decision. She figured neighbors would be looking at their options together over a bottle of wine, so she assigned case managers according to social groups. Case studies of buyouts show that individual considerations play only a limited role in whether a family leaves or stays. "The implication here is that

Flooding Up Close

When people think about sea-level rise (SLR), the first thing that comes to mind is the beach—narrow, sandy environments that are visibly exposed to surging water and powerful waves. Although New Jersey is known for its Atlantic coastline, much of it composed of barrier islands that are engineered to stay in place, it has a tidally influenced shoreline spread across 20 of its 21 counties. As SLR accelerates through this century, it will make tidal flooding more

common and storm flooding more extreme, causing economic, environmental and social upheaval in all types of tidal communities, from bay-shore wetlands to barrier islands to suburbia. These are not problems for the next generation. According to a June 2018 report by the Union of Concerned Scientists, 250,000 homes in New Jersey, together valued at \$108 billion, are at risk of chronic flooding within the next 30 years.

FROM A DISTANCE

These maps show what areas will likely be inundated by high tide at 2050 and 2100. Whether we severely cut emissions or keep polluting as usual matters little for 2050 projections; existing effects aren't reversible. (The choices we make today will have a big difference on how much the seas swell after 2050.) Another major factor for New Jersey is subsidence: the land itself will sink by about 0.4 feet by 2050. Relative to the baseline sea level from 2000—the average high tide from 1991 to 2009—the New Jersey coast is likely to see one to 1.8 feet of rise by 2050, according to research by Rutgers University climate scientist Robert E. Kopp and his colleagues. There is a 50 percent chance that high tide will reach or exceed the median projection of 1.4 feet above the 2000 baseline within three decades.

New Jersey Sea-Level Projections

2050

1.4 feet of sea-level rise (high emissions, "business as usual")

2100

Lower emissions; more stable Antarctic

Lower emissions; less stable Antarctic

High emissions; more stable Antarctic

High emissions; less stable Antarctic

New Jersey

GETTING LOCAL

Zoom in, and the range of near-future threats becomes clear. Houses will routinely flood. High tide will cut off intercoastal access roads. Popular tourist beaches and protective wetlands could disappear. And these higher water levels will be intensified by every full moon, rain-storm, nor'easter and tropical storm. "Increasingly, the research is based on compound threats of flooding instead of the single factor of sea-level rise," says Bryan Jones, a geographer who models climate migration.

The single road on Gandys Beach in Downe Township

Delaware Bay

BAY WETLANDS

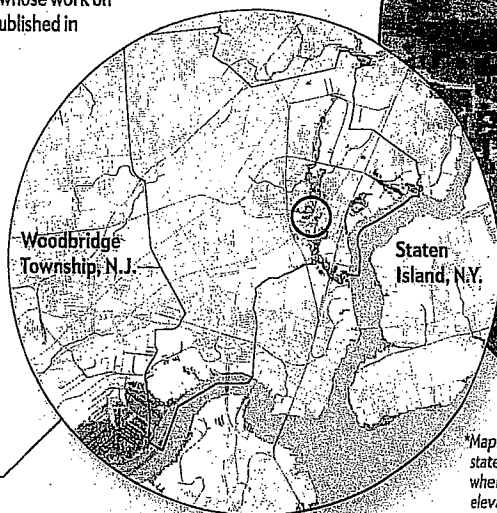
Gandys Beach hosts a single row of homes propped up on pilings, some of which are now always over the water. In May 2018 a portion of the island's road had collapsed into the waves, and the access road to the mainland is already wet at high tide. Many coastal wetlands in the mid-Atlantic region will not likely survive an SLR rate of 0.4 inch a year, which could occur here between 2030 and 2040. Without these natural buffers, communities lose one of the most effective protections against storm surges and tidal flooding.

Map by Mapping Specialists,
Graphic by Jen Christiansen

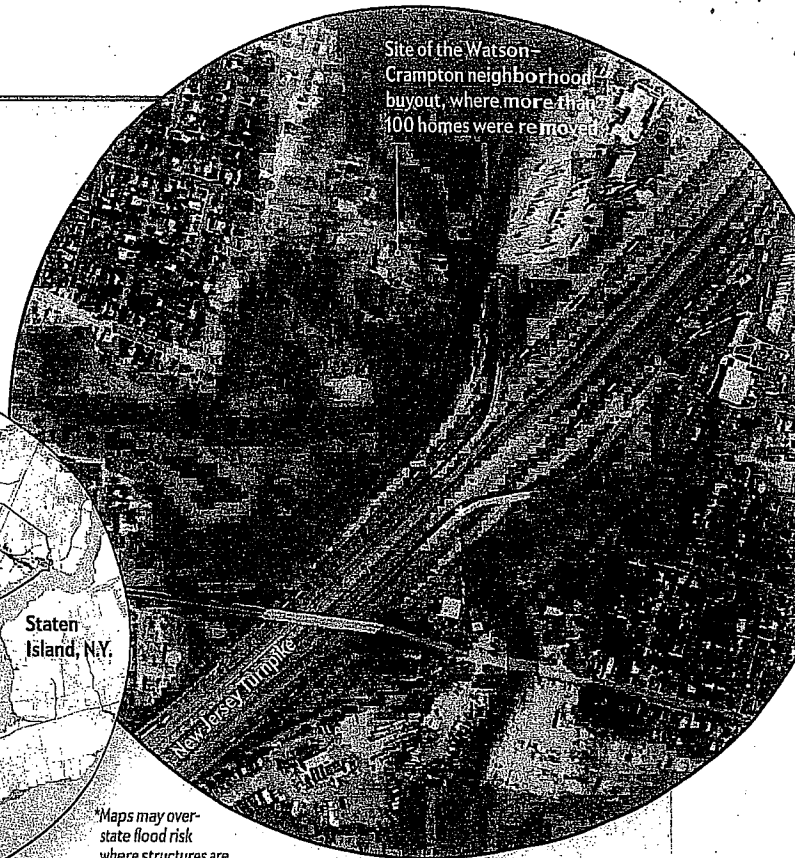
SOURCES: CLIMATE CENTRAL (base flood maps); "EVOLVING UNDERSTANDING OF ANTARCTIC ICE-SHEET PHYSICS AND AMBIGUITY IN PROBABILISTIC SEA-LEVEL PROJECTIONS," BY ROBERT E. KOPP ET AL., IN *EARTH'S FUTURE*, VOL. 5, NO. 12, DECEMBER 2017 (sea-level projections); ROBERT E. KOPP (flood height); U.S. DEPARTMENT OF AGRICULTURE (base satellite imagery)

URBAN FLOODPLAIN

Dense residential areas such as Woodbridge Township are especially vulnerable as their tidal waterways swell. "When increased river discharge, precipitation and storm surges all happen at the same time, coastal regions often experience flooding that is much, much worse than just storm surge or river flooding on their own," says oceanographer Thomas Wahl, whose work on so-called compound flooding was published in *Nature Climate Change* in 2015.



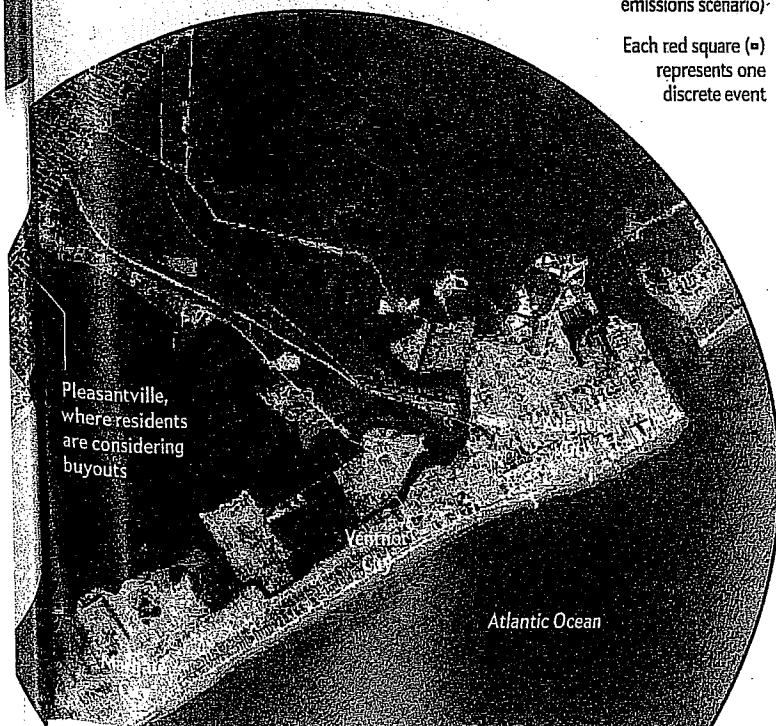
Maps may overstate flood risk where structures are elevated above land



Site of the Watson-Crampton neighborhood buyout, where more than 100 homes were removed

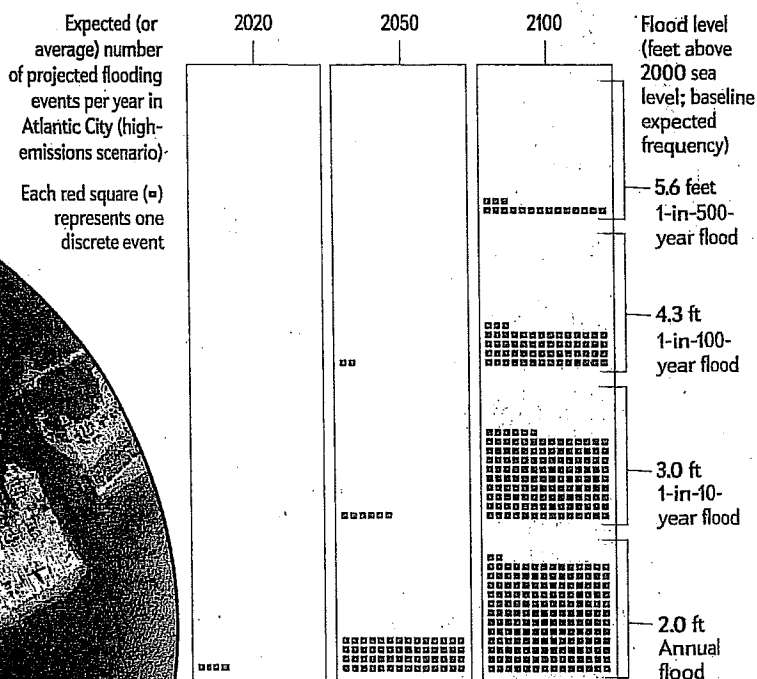
BARRIER ISLANDS

Long before popular beach towns such as Atlantic City, Ventnor City and Margate City (shown below) are permanently drowned, the effects of climate change will dismantle them in other ways. "Most people perceive the value of the beach as the sand itself," says Craig Fugate, former head of FEMA. When there is not enough space between the built environment and the water's edge to host sunbathers, will housing prices plummet? Without a sandy beach, will the town itself still have an economic raison d'être? "The question for the Jersey Shore is, Do you start thinking about giving up that first row of homes, businesses and streets in order to get the beach back?" Fugate asks. "Or will we climb up a seawall and walk directly into the water?"



A FUTURE OF REGULAR FLOODING

The maps here show projections of how the baseline sea level will change in the future, inundating currently dry land during high tide. Just because a certain block or property isn't getting wet every day doesn't mean it will be desirable, or even possible, to live and work there. Tidal flooding, sometimes called "nuisance" or "sunny day" flooding, will occur regularly because the baseline water height is getting higher. And when storms arrive, their surges and waves will be more destructive and far-reaching. This chart shows how the frequency of flood events at a given height in Atlantic City are projected to increase as baseline sea level grows.



residents' perceptions of their broader community were more influential in the buyout decision than were their experiences of Sandy, or their personal or family characteristics," wrote Sherri Brokopp Binder, an expert on postdisaster relocation, and her colleagues in a 2015 study in the *American Journal of Community Psychology*. McGee realized that grassroots support from a few residents could make all the difference between a transformative buyout and a dud.

IT DIDN'T TAKE LONG after Sandy for Monique Coleman to decide that she wanted a buyout. Now she would have to convince her neighbors and the town to want the same. McGee remembers meeting Coleman in 2013, when she hosted a standing-room-only meeting in Woodbridge to tell the residents about Blue Acres. "People would listen to me but then look over at Monique for her to signal it was okay," McGee says. "We always have police at these meetings because people get heated, but Monique had this calming effect on her neighbors. It was astonishing."

Coleman, it turned out, had exposure to grassroots organizing dating to her childhood. Her grandmother took her to Black Liberation Movement meetings, and her father brought her door-to-door during his city council run. These days Coleman works as a teacher for blind children, so in a sense her profession is helping others adapt to unfamiliar challenges. When Coleman and a handful of buyout supporters began canvassing their own streets in late 2012, she expected resistance. "You can't present this idea once, and when you hear that 'no,' just say, 'Okay, I understand,'" she says. She set up a blog and a Facebook group and organized monthly meetings. It was going to take a lot of listening at a time when people were traumatized by Sandy and overwhelmed by the day-to-day choices of recovery.

Blue Acres has been touted as a model for how retreat might evolve. Roy Wright, former resilience lead at FEMA, called New Jersey's approach to buyouts "masterful." But in all McGee's meetings and maps and her talks with mayors and residents, she was not able to evoke the language or data of climate change. Until January 2018, under the administration of Governor Chris Christie, McGee "was not to use those terms," as she puts it.

So Coleman took it on herself to "learn the scientific side of things." When she started doing Web searches for the impacts of climate change in 2012, she couldn't find much that spoke to her area specifically—it simply didn't exist yet. But what she did find convinced her that the back-to-back floods she had experienced in Woodbridge weren't a spate of bad luck but signals of a new reality. Coleman wrote and distributed a leaflet of 12 reasons why life in the flood zone wasn't sustainable in a climate-changed future.

Eventually some of her neighbors stopped slamming their doors when she showed up to chat about buyouts and started asking her questions instead. Coleman was patient but persistent. "It is very hard for people to accept this is really happening," she says. She explained that no matter how she sliced it, she found no positive paths forward. Leaving for good was simply the least onerous. "Who knows when a flood will come again," she would tell her neighbors. "But it will be coming."

THE MODELS SCIENTISTS HAVE MADE to predict the influence of sea-level rise on those future floods have become highly sophisticated, combining global factors such as the thermal expansion of the seas with local variables such as land subsidence and vari-

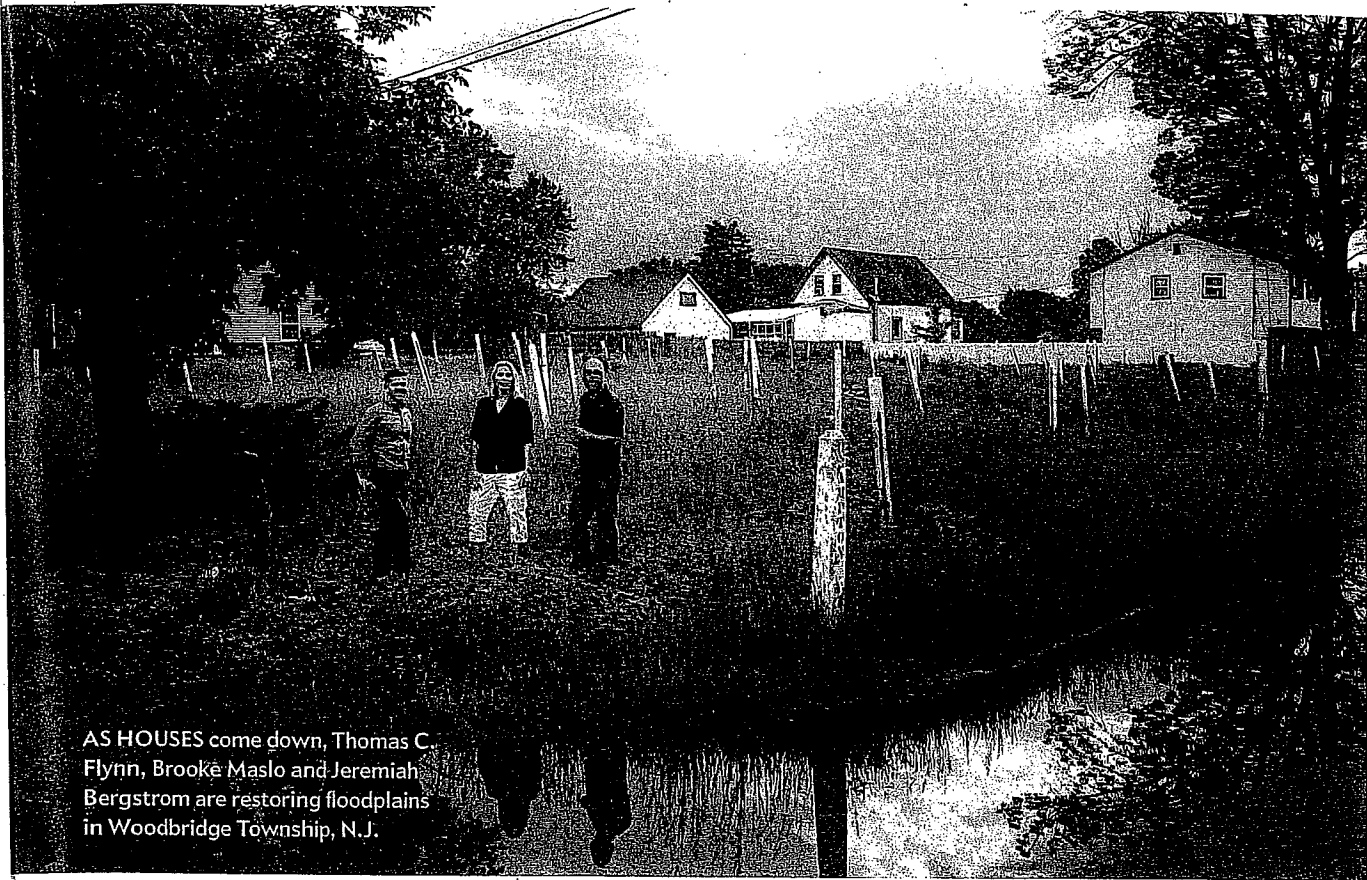
ations in the gravitational pull of land on the ocean around it. But major uncertainties remain. For one thing, we don't know how quickly and severely societies will cut greenhouse gas emissions. For the next few decades certain effects will occur regardless of how much we mitigate climate change. Rutgers's Kopp, a leading climate scientist, says that New Jersey will likely experience between one and 1.8 feet by 2050. Even at the low end, numbers like that will reshape life along the coast. After 2050 the rise continues to accelerate, but the picture gets murky: NOAA estimates that New Jersey could see between three and 12 feet of sea-level rise by 2100. That range is overwhelming if you're a mayor who is trying to come up with an adaptation strategy. "Climate change is a study of probabilities, but the public wants yes or no answers," says Graham Worthy, director of the National Center for Integrated Coastal Research.

Besides the human element, however, the biggest wild card when it comes to the fate of coastal communities in New Jersey and beyond is the stability of the West Antarctic ice sheet. The rate at which the whole of Antarctica is shedding ice has tripled over the past decade, and West Antarctica, being especially sensitive to the forces of climate change, is one of the most rapidly changing places on the planet. The West Antarctic ice sheet is so voluminous that it will add more than 10 feet of sea-level rise alone if it catastrophically collapses. This scenario might only be avoided with extreme emissions cutbacks in the next decade, according to a June 2018 report in *Nature*.

NASA's satellites have been collecting data on this ice sheet and others for more than four decades. Satellites are unrivaled at capturing continuous observations over a wide area, but they can't pick up details that would make it possible to predict the ice sheet's fate with a higher degree of certainty. Some of those more granular clues include ice thickness, the grounding line where a glacier's base meets the sea and the slope of the ice sheet, which is a driving force that sends ice from the interior of the continent to the ocean, says Kenneth Jezek, a glaciologist and retired polar researcher. Because of its sheer size and remoteness, studying West Antarctica up close is a dangerous, logistical nightmare.

One survey project, a NASA airborne mission called Operation IceBridge, has been able to capture some of those details by flying above the region in a retrofitted jetliner. From an altitude of just 1,500 feet, scientists onboard this winged laboratory can see that the top of the ice sheet is textured with signs of movement, such as geometric crevasses, the milky cerulean of ancient ice exposed to sunlight and cracked-up plains that resemble lake beds in drought. These features, they know, are carved by katabatic winds from above and by invisible rivers from below. But it is the ridges of black bedrock that hint at dramatic topography underneath the ice—a hidden world that IceBridge has been mapping extensively over the past decade.

To understand what is happening under the frozen surface, pilots maintain a precise track over the sheet while radar streams data to an onboard computer screen, revealing evidence of entire mountain ranges and valleys that make up the shape of the continent. A gravimeter picks up the depth and size of glacial cavities filled with seawater, a marker of how floating ice shelves might be melting as they interact with the ocean. Along the glaciers' terminal edges, icebergs float against the inkiness of the Amundsen Sea, a scene photographed every second by two cam-



AS HOUSES come down, Thomas C. Flynn, Brooke Maslo and Jeremiah Bergstrom are restoring floodplains in Woodbridge Township, N.J.

eras affixed to the belly of the plane. IceBridge has flown some of these tracks year after year, capturing change in unprecedented detail. At a time when the necessity of earth science is being attacked by political leaders, "I can't emphasize enough that we do not collect this data because we find it scientifically interesting," says John Sonntag, IceBridge's mission scientist. "We collect it to try to warn and protect our communities from sea-level changes that are coming their way."

As raw data from IceBridge, satellites and similar projects have percolated through scientific papers and reports such as the 2017 National Climate Assessment, new tools have emerged. NOAA's Digital Coast and Climate Central's Surging Seas, for instance, allows town planners to begin envisioning how sea-level rise will affect flooding in their jurisdictions.

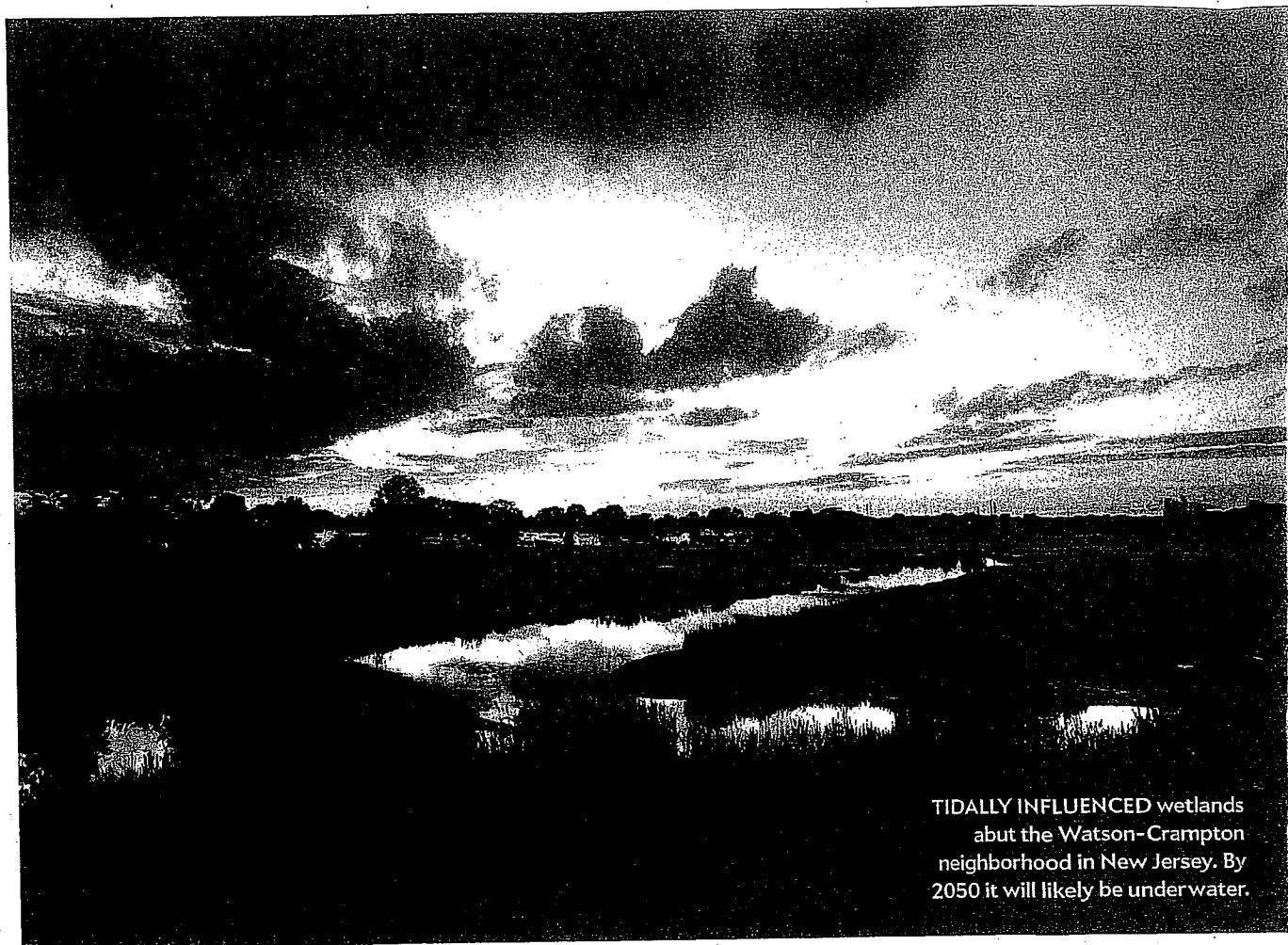
IceBridge data have turned out to be essential for filling in fundamental gaps in polar ice knowledge, "but we still have a way to go in Antarctica," says Eric Rignot of the University of California, Irvine, and NASA's Jet Propulsion Laboratory. Rignot was the lead author on a landmark 2014 paper in *Geophysical Research Letters* that used radar measurements of a large sector of West Antarctica and concluded that it "is undergoing a marine ice sheet instability that will significantly contribute to sea level rise in decades to centuries to come." That same week a *Science* paper suggested that, based on modeling, the collapse of the West Antarctic ice sheet had already begun, making extreme sea-level rise inevitable, possibly within two centuries. But Rignot thinks that time line might be too conservative. Real observations of ocean temperature—and how glaciers are responding to those warmer

waters—are still "totally lacking" in parts of Antarctica, meaning that "it is a matter of fact that our projections tend to underestimate sea-level changes," he says.

Neither Rignot nor Jezek thinks that launching the next NASA ice-monitoring satellite, slated to happen next month, will be enough to narrow the uncertainties coming out of Antarctica. Rignot suggests that it will take more airborne research such as IceBridge, along with shipborne surveys by unmanned subs and multibeam sonars and new forms of intelligent technology—"an entire army of robotic devices"—dispatched to the remotest fringes of the continent.

This October science teams led by the U.S. and U.K. will travel by air and icebreaker to West Antarctica's marquee feature—the massive and infamously unstable Thwaites glacier—to do just that. More than 100 scientists from around the world will study the interaction between warming ocean water and the ice shelf to examine how Thwaites is thinning from below. Thwaites is like a tub stopper holding much of West Antarctica in place; if it's doomed, so is the ice shelf. The more these researchers and others learn about the shifting dynamics among ice, ocean water and atmosphere, the more factors they can plug into regionally specific sea-level predictions. The data they gather will inform whether coastal populations have centuries, or mere decades, to prepare for the onset of the deluge.

BY THE SUMMER OF 2014, when Coleman signed over the deed to her old house and moved into a new one, Woodbridge Township was on its way to becoming the site of Blue Acres' biggest



TIDALLY INFLUENCED wetlands about the Watson-Crampton neighborhood in New Jersey. By 2050 it will likely be underwater.

ever buyout project. Today a total of 142 homeowners have accepted offers. And about 115 homes from the Watson-Crampton neighborhood alone have been removed, most of them clustered within a grid of streets covering about 30 acres. Millions of people globally will have to move inland to escape the coming floods, so these numbers can sound too tiny to be meaningful. But what happened in Woodbridge upends many of the assumptions traditionally tied to buyouts: that no residents want to leave, that politicians will never get onboard, that ecological health in suburbia will never win out over real estate growth and that no one is planning for a climate-changed future by making painful choices in the present. "What we're doing here is paving the way for conversations about how to manage retreat," says Thomas C. Flynn, the town's floodplain manager.

Officially the buyout process ends once the property has been demolished. Woodbridge, however, found itself with an abundance of lots and ambitions beyond mowing the grass. The town reached out to Rutgers ecologist Brooke Maslo, who works with the school's Cooperative Extension to assist New Jersey communities with science-based projects. The term "resilience" gets tossed around a lot, "but what does it actually translate to?" Maslo asks. She came to see the Watson-Crampton buyout project as a unique opportunity: she could create a floodplain restoration that buffered the remaining neighborhood from sea-level

rise. She brought in Jeremiah Bergstrom, a landscape architect with experience managing stormwater in urban environments. "As far as I can tell, this is the first coastal land restoration in the context of residential retreat," Bergstrom says.

Using nature as infrastructure is a well-established concept—think mangroves and oyster beds as storm-surge absorption—but it is not commonly applied in places as densely developed as the greater New York City area. Liz Koslov, an assistant professor at the University of California, Los Angeles, who did ethnographic research on Staten Island's post-Sandy buyouts, says she has seen next to no discussion about what happens to the land itself after the houses come down. "Residents said they just want the land to go 'back to nature,' but when you get down to it, 'nature' can mean a lot of different things," she says. Karen O'Neill, a Rutgers sociologist who is cataloguing global instances of coastal retreat, says that "you hardly ever see a comprehensive ecological restoration. It just doesn't exist."

The Watson-Crampton neighborhood can't simply return to nature, because it was built on fill. "We have to re-create a new ecology, a new nature," Bergstrom says. Over the past year the restoration team has ripped out roads, assessed soil quality, and planted more than 950 saplings to increase flood storage capacity and encourage the growth of a biodiverse salt-marsh habitat. Without intervention, the land would become a monoculture of

invasive reeds that can break down and form dense mats, which might ultimately make flooding issues worse, Flynn explains. Maslo and her team are softening the hard curvature of the swale so that tidal surges entering from the river below the New Jersey Turnpike don't rush in at high velocity. They'll carve a channel that will allow for spillover, with the hope that the depressions will create permanent standing water for wildlife. Maslo wants to prove that a town can recoup its tax losses with new lures, such as parkland trails and a kayak launch. "This is not a wasteland," she says.

Maslo's vision helped to convince the Woodbridge mayor and city councillors to change the township's buyout regions—120 acres in all—from residential zoning and existing marshland to something they named the Open Space Conservation/Resiliency Zone. No development would be allowed. Nineteen households in the Watson-Crampton buyout area dug in their heels. The town warned these "holdouts" that if they ever wanted to sell, their houses would first need to meet new floodplain standards—which would likely mean elevating them higher. Land-use changes like this are controversial because they make what is supposed to be a voluntary process into one that is significantly less so. But without them, developers might be attracted to come in and build bigger and higher properties. Then new people—those who can afford higher flood insurance premiums and the building costs of living in a floodplain—are likely to move in, replacing those who can no longer afford to stay.

FOUR YEARS AFTER RELINQUISHING her home to the forces of nature, Coleman says she has no regrets about taking the buyout. For moving within the same county, she received an incentive grant of \$10,000, which helped her afford another single-family home on higher ground. The process was financially and emotionally stressful, but the way Coleman describes her participation reframes a reaction to misfortune as a deliberate act. In an era of climate refugees who will be forcibly cast out of their homes by either too much water or not enough, Coleman sees herself as more of a retreat pioneer—someone who seized whatever agency she could as she faced an uncertain future. "There's nothing worse than sticking your head in the sand and resisting all this change going on around you," she says. "Because then you end up feeling pushed to make a decision that you are not prepared to make."

McGee, meanwhile, is playing the long game. In the spring of 2018, five and a half years after Sandy, Blue Acres was still submitting new buyout applications to the federal government. Woodbridge is on its third round of buyouts, which involves seven of the 19 holdouts that remain in the resiliency zone. "I don't close out a grant until we've done enough demolition so that the holdouts can digest how the character of their community is changing," McGee says. The tactic is working. She has spent \$172 million of her total funding pot, which has grown as other recovery programs failed and FEMA directed the unused money her way. Blue Acres has facilitated nearly 1,000 buyout offers since Sandy, of which 713 have been accepted by homeowners. "You think it'd be 10,000 families for all the work we've done, but it's not, because it's so damn hard," McGee says.

Woodbridge's resiliency zone is not quite ready to be held up as a demonstration project. The work isn't done, and the marsh isn't yet beautified. Over the years, as the houses came down in

stages, the scene sometimes looked like an eerie abandonment of the built environment, not a harbinger of progressive adaptation. But now that nearly all the structures are gone and the outlines of formerly paved roads are blurring into grass, "it looks less like a ghost town and more like it's just land," says Coleman, who visits every few months to see the transition in progress. "Now it's the houses that look like they don't belong."

No one disagrees that undeveloping certain areas of the coastline will be messy and expensive. But as the science of coastal resilience becomes more collaborative, the how-to of retreat may become less daunting. Retreat, after all, will not mean drawing a line some distance inland from Maine to Florida and removing everything to the east, explains Bryan Jones, a geographer who models climate-induced human migration. Modeling combined with artificial intelligence is now producing tools that allow planners to play out what-if scenarios in their towns. If, say, you buy out 40 houses from one location, restore ground-water storage and run the 100-year flood of the future, would that significantly reduce damage to adjacent houses? What are the social and economic trade-offs of undeveloping one neighborhood to protect another? Can land be designated as a safe relocation spot? These are the kinds of questions that Fugate, who led FEMA during Sandy, and others are working on now. "Just as the quantification of catastrophe risk drove a huge expansion in catastrophe insurance, it is about to drive a great industry of disaster risk reduction," wrote Robert Muir-Wood in his 2016 book *The Cure for Catastrophe*.

Retreat is so new that few planners are thinking about the next step: relocation. "Globally, there's substantial evidence that people end up right back in harm's way," Jones says. In a survey of Staten Island families who took buyouts after Superstorm Sandy, Binder, the sociologist, found that 20 percent moved to a home that is equally or more vulnerable to flood risk. As more people begin to flee slightly inland, they will encounter a wave of people still moving toward the coast. Just like backwash hitting the surf, the result could be turbulent.

As U.C.L.A.'s Koslov wrote in 2016 in *Public Culture*, "the complexity and ambivalence of retreat serves as a reminder that there are no easy solutions and that it is not possible to rebuild forever or to wall ourselves off from the problems we face." Retreat signals not just the physical movement of recalibrating to the tides but an existential reckoning with our ways of living along the water. The word itself is borrowed from the language of geologic processes, which humans have undeniably hastened. As glaciers and beaches retreat, so, too, will we. ■

MORE TO EXPLORE

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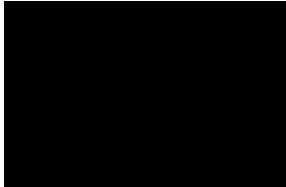
scientificamerican.com/magazine/sa



WORTHING BOROUGH
COUNCIL

Worthing Borough Council
Town Hall
Chapel Road
Worthing
West Sussex, BN11 1HA
www.adur-worthing.gov.uk

Mr Robert Margrett



Date: 14/AUG/2018
Service: Place & Economy
Tel: 01273 263179
economyteam@adur-worthing.gov.uk

Our Reference:- PE140818

Dear Mr Margrett,

Thank you for your letter dated 9th August 2018 regarding the New Scientist article "We must build for a warmer future" from 4th August 2018. We have read this article with interest, thank you for bringing this to our attention.

As you are aware we are working in partnership with West Sussex County Council (WSCC) on a number of projects, therefore we will also pass your findings to our colleagues at WSCC.

Thank you again for taking the time to write in.

Kind Regards,

Andy Willems
Head of Place & Economy
Adur & Worthing Councils
andy.willems@adur-worthing.gov.uk
01273 263179



ADUR & WORTHING COUNCILS

Planning and Development

Mr R Mowgrett



Our Ref: JA/lja
Your Ref:

21st August 2018

Dear Mr Mowgrett

Re: Building for a Warmer Climate

Thank you for your letter dated 9th August 2018 enclosing the interesting article from New Scientist. It was good to see this issue being raised by the BBC recently as well and I agree more needs to be done to react to the challenges posed by climate change. I have passed a copy to my Building Control Manager and Planning Services Manager for information.

Yours sincerely

James Appleton
Head of Planning and Development
Tel: 01903 221333
e-mail: james.appleton@adur-worthing.gov.uk





Home > News stories > Current approach to protecting England's coastal communities from flooding and erosion not fit for purpose as the climate changes

Current approach to protecting England's coastal communities from flooding and erosion not fit for purpose as the climate changes

26 October 2018

A new, long-term approach to coastal management in England is urgently needed given the expected impacts of climate change, the Committee on Climate Change (CCC) says.

Climate change will almost certainly cause sea levels around the UK to increase by 1 metre or more at some point in the future, and this could happen as early as 2100 – within the lifetimes of today's children.

In a new report, 'Managing the coast in a changing climate', the Committee finds that coastal communities, infrastructure and landscapes in England are already under significant pressure from flooding and erosion. These threats will increase in the future.

As a result, some coastal communities and infrastructure are unlikely to be viable in their current form. This problem is not currently being confronted with the required urgency or openness, the Committee's report shows.

Long-term action to adapt England's coasts to climate change in a sustainable way is possible and could deliver multiple benefits. However, the Committee finds that plans for the coast are not realistic about the implications of climate change, and are not backed up with funding or legislation.

The report, by the CCC's Adaptation Committee, highlights that:

- **Today, 520,000 properties in England, including 370,000 homes, are located in areas at risk of damage from coastal flooding and 8,900 properties are in areas at risk of being lost**

through coastal erosion. Damages from flooding and erosion are over £260million on average each year.

- **By the 2080s, up to 1.5million properties, including 1.2 million homes, may be in areas at significant level of flood risk** and over 100,000 properties may be in areas at risk from coastal erosion. In addition, 1,600km of major roads, 650km of railway line, 92 railway stations and 55 historic landfill sites are at risk of coastal flooding or erosion by 2100.
- **The public are not clearly informed about the coastal erosion risk** to which they are exposed or how this risk will change in future.
- **Coastal management in England is covered by a complex patchwork of legislation**, and is carried out by a variety of organisations with different responsibilities. Conflicting aims mean that coastal erosion and flooding are not getting the attention they deserve. Long-term *Shoreline Management Plans* for coastal areas in England cannot be relied on to solve the problem as they are not legally-binding and contain unfunded proposals.
- **Implementing current policies to protect England's coast would cost £18-30 billion** depending on the rate of climate change. Existing plans to protect a third of England's coastline are far less cost-effective than the flood and coastal erosion protection measures that are funded by the Government today.
- **Ambitious actions to reduce greenhouse gas emissions and adapt to the effects of climate change** could reduce the risk for 400,000-500,000 people in England by 2100. However, the risks of harmful coastal flooding and erosion cannot be eliminated altogether.

The Committee makes five recommendations to the authorities involved in managing England's coasts:

- **The scale and implications of future coastal change should be acknowledged** by those with responsibility for the coast and adequately communicated to people living on the coast.
- **Local Government and the Environment Agency must work with affected communities to develop realistic long-term strategies** that are rigorously implemented in Local Plans, regulations and projects.
- **The UK Government's approach to the management of coastal flooding and erosion risk needs to change.** A new approach should be long-term, evidence-based, and include the views of coastal communities.
- **The Government should make long-term funding and investment available** to protect coastal cities and infrastructure, restore more coastal habitats and help affected communities cope with inevitable changes.

- **Plans to manage and adapt specific shorelines over the coming century should be realistic and sustainable in economic, social and environmental terms.**

Professor Jim Hall, the CCC Adaptation Committee's expert on flooding and coastal erosion, said: "As the climate changes the current approach to protecting the English coastline is not fit for purpose. It's time people woke up to the very real challenges ahead. As sea levels rise and flooding and erosion get worse, we have assessed that current plans for around 150 kilometres, or 90 miles, of the coastline are not cost-beneficial to implement. The Government and local authorities need to talk honestly with those affected about the difficult choices they face. Climate change is not going away: action is needed now to improve the way England's coasts are managed today and in the future, to reduce the polluting emissions which cause climate change, and to prepare seaside communities for the realities of a warming world."

Topics:

[Adaptation](#)[Coastal change](#)[Flooding](#)

Related:

Managing the coast in a changing climate

26 October 2018

Related publications

Managing the coast in a changing climate

26 October 2018

Contact us

Committee on Climate Change
7 Holbein Place,
London,
SW1W 8NR

Enquiries: 020 7591 6080

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Cllr. Bob Smytherman
Worthing Borough Council
Town Hall
Chapel Road
Worthing
BN11 1HA

12th November 2018

Dear Cllr. Smytherman:

Following our chat the other day – last Thursday by the library – about Worthing Climate Action Network (of which I am a member) and its endeavours to persuade the county's Pensions Panel to alter the LGPS investment strategy and divest all fossil fuel assets from the pension fund, I would like to thank you for all your efforts on WCAN's behalf in this matter.

We also discussed recycling, so I thought you would be interested to see the piece included in Horsham District Council's news publication – "Our District" – on it's recycling performance; on the other side of the page you'll find a report on an HDC supported water "refill" programme – something which WCAN campaigns for in Worthing with the Refill Project (refill.org.uk).

Over the years I have written a number of letters on environmental issues to WBC, HDC and the County Council; most recently, regarding plans for Worthing town centre and Teville Gate and shoreline implications in light of expected sea-level rise this century and beyond. Regarding the latter I am enclosing:-

A brief from the Committee on Climate Change 26/10/18 (CCC) – the government's advisory body - on implications for coastal communities further to the PCC's Special Report released 8/10/18, putting the World on notice of what needs to be done to hold a rise in global temperature of no more than 1.5°C over the pre-industrial era, the predicted consequences of that rise and the dire outlook if we fail.

Two directly related articles published in The Guardian – "UK will have to intervene in market to meet climate obligations" 10/10/18, and "Rising sea levels will claim homes around English coast, report warns" 26/10/18; and an article printed in The Economist "Britannia ruled the waves" 3/11/18.

In addition to sea-level rise, weather pattern changes could lead to increased storms with attendant risk of greater tidal surges.

I enclose an article from the New Scientist 21/10/18 "The road reimagined", which fits with some of the thinking behind Worthing's Public Realm Options. I've suggested a free electric bus shuttle service between Teville Gate and downtown. I hope to visit the Worthing Local Plan event taking place in the Town Hall Friday 23rd.

Thanks again for your help and support.

Yours sincerely,

Robert Margrett

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

copies to:

[REDACTED]

Encls: "Residents crack recycling target ahead of time" Our District, Winter 2018.

"The Refill movement in our District" Our District, Winter 2018

"Current approach to protecting England's coastal communities from flooding and erosion not fit for purpose as the climate changes" 26/10/18 CCC.

"UK will have to intervene in market to meet climate obligations" 10/10/18 Fiona Harvey. The Guardian.

"Rising sea levels will claim homes around English coast, report warns" 26/10/18 Damian Carrington, The Guardian.

"Britannia ruled the waves" 3/11/18 The Economist

"The road reimagined" 22/10/18 Alice Klein, New Scientist

REG 18 CONSULTATION OCT 31st – 12th Dec 2018

Representation

Name	Julie Tuppen
Organisation	Adur & Worthing Councils
Address	Worthing Town Hall, Chapel Road, Worthing, West Sussex, BN11 1HA
Email	julie.tuppen@adur-worthing.gov.uk

WLP Database	Yes
Newsletter	No

General comments

I have been asked to comment on the Healthy Communities as above

I feel it is a very good and comprehensive draft policy, my only comment would be that although it talks of people of all ages , there is no reference in real terms to children and young people, and could possibly include something that is "family friendly" reflects "start well" of the A&W Public Health Strategy.

I am referring to the supporting text - **Healthy communities 4.86**

I have recently been looking at Health Inequalities and I rather like the guidance given in Health and wellbeing - gov .uk

" The creation of healthy living environments for people of all ages which supports social interaction. It meets the needs of children and young people to grow and develop, as well as being adaptable to the needs of an increasingly elderly population and those with dementia and other sensory or mobility impairments."

4.86 - . These spaces provide a vital natural resource in whichcould possibly have something that incorporates the needs of children and young people?

4.91 - space for children to play?

These are my thoughts. It all looks really exciting, a really positive local plan.

Consultation response- PLEASE READ

1 message

Consultations (MMO) <Consultations.MMO@marinemanagement.org.uk>
To: Worthing Local Plan <worthinglocalplan@adur-worthing.gov.uk>

01 October 2018 at 17:14

Thank you for including the MMO in your recent consultation submission. The MMO will review your document and respond to you directly should a bespoke response be required. If you do not receive a bespoke response from us within your deadline, please consider the following information as the MMO's formal response.

Kind regards
The Marine Management Organisation

Response to your consultation

The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants.

Marine Licensing

Activities taking place below the mean high water mark may require a [marine licence](#) in accordance with the [Marine and Coastal Access Act \(MCAA\) 2009](#). Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. Local authorities may wish to refer to our [marine licensing guide for local planning authorities](#) for more detailed information. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales. The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that that would affect a UK or European protected marine species.

Marine Planning

As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas.

Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the [Marine Policy Statement](#) for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the [Marine and Coastal Access Act](#) and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our [online guidance](#) and the [Planning Advisory Service soundness self-assessment checklist](#). If you wish to contact your local marine planning officer you can find their details on our [gov.uk page](#).

[The East Inshore and Offshore marine plans](#) were published on the 2nd April 2014, becoming a material consideration for public authorities with decision making functions. The East Inshore and East Offshore Marine Plans cover the coast and seas from Flamborough Head to Felixstowe. For

further information on how to apply the East and Inshore and Offshore Plans please visit our [Marine Information System](#).

[The South Inshore and Offshore marine plans](#) were published on the 17th July 2018, becoming a material consideration for public authorities with decision making functions. The South Inshore and South Offshore Marine Plans cover the coast and seas from Folkestone to the River Dart in Devon. For further information on how to apply the South Inshore and South Offshore Marine Plans please visit our [Marine Information System](#).

The MMO is currently in the process of developing marine plans for the remaining 7 marine plan areas by 2021. These are the [North East](#) Marine Plans, the [North West](#) Marine Plans, the [South East](#) Marine Plan and the [South West](#) Marine Plans.

Minerals and waste plans and local aggregate assessments

If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below:

- The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK) construction industry.
- The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply.
- The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply.
- The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply.

The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained.

If you wish to contact the MMO regarding our response please email us at consultations@marinemanagement.org.uk or telephone us on 0300 123 1032.

The Marine Management Organisation (MMO) The information contained in this communication is intended for the named recipient(s) only. If you have received this message in error, you are hereby notified that any disclosure, copying, distribution or taking action in reliance of the content is strictly prohibited and may be unlawful. Whilst this email and associated attachments will have been checked for known viruses whilst within MMO systems, we can accept no responsibility once it has left our systems. Communications on the MMO's computer systems may be monitored and/or recorded to secure the effective operation of the system and for other lawful purposes.

Worthing Borough Council Local Plan Consultation**Regulation 18 consultation October – December 2018****West Sussex County Council Officer Level Response**

The draft Worthing Local Plan looks ahead to 2033 and will be a key document in shaping the future of Worthing Borough. The Plan sets out:

- a vision of what the town will be like in 2033;
- a set of strategic objectives to help deliver that vision;
- a spatial strategy guiding the location of new development;
- proposed allocations for development;
- areas that are proposed to be protected from development; and
- a set of 'Core Policies' against which all new development will be assessed.

The Local Plan will provide the strategy for growth, setting out what development will take place and where. Once adopted, the new Plan will replace the Worthing Core Strategy and will be an important consideration in determining planning applications in the borough.

This note sets out West Sussex County Council's officer response to the consultation on the draft Worthing 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 part 1 of the Plan, Characteristics of the Borough, under 'Environment' there is recognition that opportunities for recreation and leisure are available in the National Park; but access other than roads is not commented on. It is suggested that paths for local community interactions, alternative routes to roads are also referenced here, linking well to the later plan policies, such as SP4(e) & (f) and CP24, which are supported.

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.

In addition to the text in paragraph 1.6, it is considered that within the local policy context (Chapter 2), there should be reference to the West Sussex and South Downs National Park Waste and Minerals Plans. These form part of the Development Plan for the area. These plans should be considered by applicants, and when determining applications in the area.

Policy W23 of the Waste Local Plan applies to all Districts & Boroughs, regarding waste management within development and should be referenced in the Worthing Local Plan.

Connectivity and Sustainable Travel

West Sussex County Council has supported Worthing Borough Council with the preparation of the Worthing Local Plan Transport Assessment and supports its overall conclusion that subject to delivery of various mitigation measures, the proposed strategic developments could come forward without leading to severe impacts on the transport network.

The Worthing Local Plan Transport Assessment that supports the Local Plan preparation, as well as the Strategic Transport Investment Programme for the area, will identify the strategic transport improvements required to mitigate planned development in the draft Local Plan. Sustainable transport measures will also be required to mitigate planned development. These will be identified through more detailed assessments of sites including pre-application consideration. Funding will need to be identified through development and other sources as well in some cases.

There are two main junction improvements identified through the Worthing Local Plan Transport Assessment at A259/A23032/Titnore Lane (Goring Crossways) and at A2032 Littlehampton Road/ The Boulevard. Impacts further into the town are to be addressed through the sustainable transport strategy, for which a flexible strategy is proposed with alternatives and complementary measures set out in the transport study report. It is important that CIL contributions from Local Plan developments sites are allocated to development and implementation of this strategy.

There are also a number of sites where flow increases are forecast through accident cluster sites, leading to recommendation for road safety treatments. These include at A259 Goring Way to the east of the Goring Street roundabout and at B2223 Dominion Road. Access strategies are also set out for allocation sites, divided into Built Up Area and Edge of Town sites.

The sustainable transport strategy and highway capacity improvements are supported by the Local Plan transport policy CP24, however it is considered that the policy would benefit from strengthening for road safety, as it does not include a specific commitment to take forward the road safety recommendations from the transport study. This could be addressed with an additional point under CP24 b). It is suggested that the text for this could follow a similar format to the point for highway capacity, such that it would read *"support improvements to the safety of the road network in the Borough for all road users and, as identified in the Worthing Local Plan Transport Study (2018), provide appropriate mitigation measures to address identified safety issues at a number of key locations."*

Fire and Rescue Service (FRS)

The increase in dwellings, as well as commercial, employment, retail, health care and leisure developments, identified in the Worthing Local Plan will increase FRS call volume. It is estimated that the combined increase in demand is considered

to be within the current operational capacity. This is based on estimates, without further detail on planned developments at this stage.

Development of the proposed scale would undoubtedly lead to an increase in activity levels for Community Fire Safety and prevention and also Business Fire Safety Team. Without knowing further detail of planned commercial, retail and care home development, at this time we cannot predict what this increase in activity would look like and if it would require further resourcing.

Further detail also cannot be given on Fire Safety requirements ahead of the completion of the Grenfell enquiry.

Regarding increased activity, we seek for developments to consider all due fire precautions including domestic (and commercial) sprinkler systems and also access required for Emergency vehicles.

In the West Sussex County Council "Local Flood Risk Management Strategy" it is noted that: *"Worthing District contains the Worthing wet spot covering the low lying coastal urban area. The flood risk in Worthing is posed by surface water and the sea. If an extreme rainfall event was to occur thousands of properties would be in risk areas in the town. Only in a very rare tidal and storm event would Worthing be expected to flood from the sea."*

Worthing District is largely urban and is bordered by the Ferring Rife to the west and Teville Stream to the east. There are a number of ordinary watercourses that drain the two catchments. The risk of flooding is posed from a combination of groundwater, sewer, surface water run-off and coastal wave overtopping. Drainage is comprised of rainfall run-off from the South Downs and rainfall that falls on the urban area. When either or both of these inputs are high then flooding to property can occur. The low lying coastal fringe of Worthing is at risk of flooding from the sea. When groundwater is high Goring and Durrington can be susceptible to flooding. Surface water contributes significantly to the flood risk in Worthing due the urban nature of the area, and due to the drainage being compromised high tides, groundwater or blockages."

Around 10,000 properties are currently predicted at risk in Worthing. With further developments proposed that are in flood risk areas, development is likely to increase the risk of flooding events and increase demand for the FRS. In order to mitigate this, we will require developer contributions towards equipment and training for wading water rescue for crew at Worthing Fire Station.

Site Allocations, Areas of Change and Omission Sites

The West Sussex County Council Growth Deal with Worthing Borough Council, agrees to work in partnership to drive forward specific major regeneration and growth priority projects in the Borough. There is support for the inclusion of development sites A4, A5, A6, A7 and A8 that all form part of the Growth Deal. There is also support for the inclusion of sites that have been designated Areas of Change and are included in the Growth Deal (AOC 1 and AOC3). The County will work with the Borough to unlock these sites and drive development forward within the plan period through the Growth Deal.

A1 and A2

Policy W2 of the West Sussex Waste Local Plan (2014) 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.

North Barn Farm, Eurogreen Recycling (Bull Recycling) is an open windrow composting site located some 450m West of the allocations A1 and A2. Policy W2 of the Waste Local Plan should be considered in terms of continued safeguarding these uses and referenced in the Worthing Local Plan.

A2

This site is an area of mature woodland that both intercepts and therefore significantly reduces run-off to the catchment downstream. The area is prone to surface water flooding as the extract from the surface water flood map (Figure 1 in Appendix 1) clearly shows. For this reason and recognising the importance of the woodland in attenuating flow downstream, the Lead Local Flood Authority (LLFA) has concerns as to the suitability of this site for development.

Development requirements in the site brief include the statement: *adopt the sequential approach so the most vulnerable uses are located in the areas at lowest risk of flooding. As stated in paragraph 4.262, "an update is required to the SFRA to meet the requirements of the NPPF this will be undertaken in time to support preparation of the Regulation 19 version of the Local Plan".* As the LLFA, the West Sussex County Council requests further discussion and consideration of evidence related to flooding in the further consideration of this site.

West Durrington, including the site A2, is also identified as an area of significant flood risk under national flood risk mapping criteria by virtue of the concentration of population potentially affected by the risk of flooding (Appendix 1, Figure 2). The emerging Local Flood Risk Management Strategy Update (2nd cycle) will require the LLFA to give consideration to these areas of significant flood risk and will necessitate closer investigation of flood risk causes and appropriate mitigation as bound by the EU Floods Directive and the associated Flood Risk Regulations (2009).

If the Council allocates this site for development, following preparation of further evidence and consideration of the site, it is considered that the overall density of development of the site will need to take into account the existing surface water flood risk.

A3

Public Footpath 3135 runs through this site and is a popular route for access to and from Bramber First School. An access route will need to be retained, as recognised within the proposed policy. It is considered that the policy should be expanded, to improve the path surface quality and status for cycling.

A4

This allocation directly adjoins the boundary of the Household Waste Recycling Site (HWRS). The HWRS is safeguarded through policy W2 of the Waste Local Plan (2014), that should be referenced more clearly in the 'development requirements' section for the allocation. Policy W2 of the West Sussex Waste Local Plan (2014) requires the safeguarding of existing waste sites / infrastructure from other (non waste) development which may prevent or prejudice their continued operation for such purposes.

Particularly as this is the only HWRS in the borough, the council would welcome a discussion as to how it can be ensured that no safeguarding issues arise through the allocation and future development of Decoy Farm, and that future site reorganisation or expansion, if required, would not be prohibited.

It is considered that the allocation of Decoy Farm could provide reason to establish a local cycleable route connecting Dominion Way with Sompting, possibly using Loose Lane; that would support policy CP8. This should be considered through the preparation of the Local Plan.

A5

Site A5 suffers from elevated surface water flood risk (Appendix 1, Figure 3). The site is prone to high groundwater levels of between 0.025m and 0.5m below the surface. As a brownfield redevelopment, the LLFA would consider it acceptable for redevelopment providing that there is a sacrificial ground floor for any residential development.

The development requirements make reference to the need to incorporate at least 100 replacement public car parking spaces. If car parking is located on the ground floor, given the high risk of surface water flood risk across the site, the LLFA would expect development applications to be conditioned as follows; *"Developers will be required to demonstrate that drainage and separators will not release potential contaminants to the environment under flooded conditions."*

A8

The allocation sets out the details of the civic hub on the site. However, there is no mention of the Library which is a significant and important part of this area. The road that leads in to the car park provides access to the rear entrance of the Library including a loading bay. The Library needs continual access for deliveries and mobile Library provision and it is requested that this be set out as a requirement for consideration for development as part of the allocation.

OS1

Were this site to be reconsidered and come forward as an allocation, it could provide an opportunity to establish a bridleway crossing point of Titnore Lane. Bridleways provide lawful access as of right for walkers, pedal cyclists and horseriders. Should a safe crossing of the Lane be provided together with bridleways connecting Highdown Hill and development already proposed at West Durrington, this could provide a convenient means for future local residents to safely access local countryside and the National Park, and be a valuable part of an ambition for a local circular bridleway connecting Highdown Hill, the National Park and the various sites at West Durrington.

Education

As the local education authority, West Sussex County Council has the statutory duty to ensure that there is a sufficient supply of suitable school places to meet statutory requirements for early years, primary, secondary and sixth form provision (including up to age 25 for those with special educational needs and/or disabilities). Education infrastructure, or contributions to provide infrastructure, will be required in order to mitigate proposed development.

The table below sets out the primary and secondary school requirements to mitigate proposed development, over and above that already planned through the adopted Local Plan in Worthing Borough.

Settlement	Proposed housing numbers
Allocations	
Areas of Change	
Omission Sites	
Caravan Club units A1 Land West of Fulbeck Avenue units A2 Centenary House AOC1 Land East of Titnore Lane OS1 The cumulative impact from development across these sites would not have an impact on the education provision in the immediate area. Considering the additional school associated with the previously allocated Titnore Lane development, there would be sufficient capacity to cater for the child product in this area. However, should the Omission site be reconsidered then our position would have to be reviewed.	75 50 100
Upper Brighton Road A3 105 units in Parcel A – there is currently sufficient capacity within the immediate area to accommodate the pupils from this development and the further 18 units in Parcel B would not alter this situation.	123
Decoy Farm A4 There is currently no housing allocation for this site and therefore no impact on education provision.	0
Teville Gate A5 Union Place A6 Grafton Site, Marine Parade A7 Civic Centre Car Park A8 British Gas site, Lyndhurst Road AOC2 Stagecoach, Marine Parade AOC3 Any further development in this part of the borough is likely to bring forward the need for additional education provision in the area. None of the schools are able to expand beyond their current capacity. The cumulative total of development for this part of the Borough (750 dwellings) would bring forward the need for land for a 1FE expandable to 2FE school site (approx. 2ha) and financial contributions towards the construction of the new school.	300 128 113 64 85 60
Worthing Leisure Centre AOC4 HMRC Offices, Barrington Road AOC5 Martlets May AOC6 We would welcome further details as to the proposed development proposed on the Worthing leisure centre site in order to comment as to the child product and therefore need for additional school places.	TBC 250 0

SECONDARY EDUCATION PROVISION	
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The cumulative total of proposed allocations across the plan period is for a minimum 1350 dwellings. The impact of this on the secondary schools in the borough would mean that expansion by at least 1FE at one of the schools would be required. Currently the schools are all operating close to or over capacity and many have limited land available for further expansion.	
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Core Policies

CP24 Transport

As set out above, it is considered that the policy would benefit from strengthening for road safety, as it does not include a specific commitment to take forward the road safety recommendations from the transport study. This could be addressed with an additional point under CP24 b). It is suggested that the text for this could follow a similar format to the point for highway capacity, such that it would read *"support improvements to the safety of the road network in the Borough for all road users and, as identified in the Worthing Local Plan Transport Study (2018), provide appropriate mitigation measures to address identified safety issues at a number of key locations."*

CP25 Digital Infrastructure

West Sussex County Council supports the National Planning Policy Framework section 10 paragraphs 112 – 116 which outline the approach to be taken through planning policy and decisions in planning in regard to supporting high quality communications and the siting of telecommunications infrastructure. This is also supported by the 'Code of best practice on mobile network development in England' published by DCLG.

There is strong support for planning policies in Local Plans across West Sussex that prioritise how, in making planning decisions, that ensure developers make provision for gigabit-capable full fibre network and welcomes the reference in paragraph 4.301 to ensuring new development is full-fibre ready. Policy CP25 refers in general terms to 'ultrafast' speeds, it is requested that the policy instead specifically references gigabit-capable full fibre infrastructure, in order to provide future-proofed broadband services and to support the delivery of 4G and 5G mobile technology.

West Sussex County Council December 2018

Appendix 2

Flooding maps to accompany WSCC Worthing Local Plan Draft Local Plan comments Dec 2018

A2: LAND WEST OF FULBECK AVENUE



Figure 1: High (dark blue) / medium / low (lightest blue) surface water flood risk.

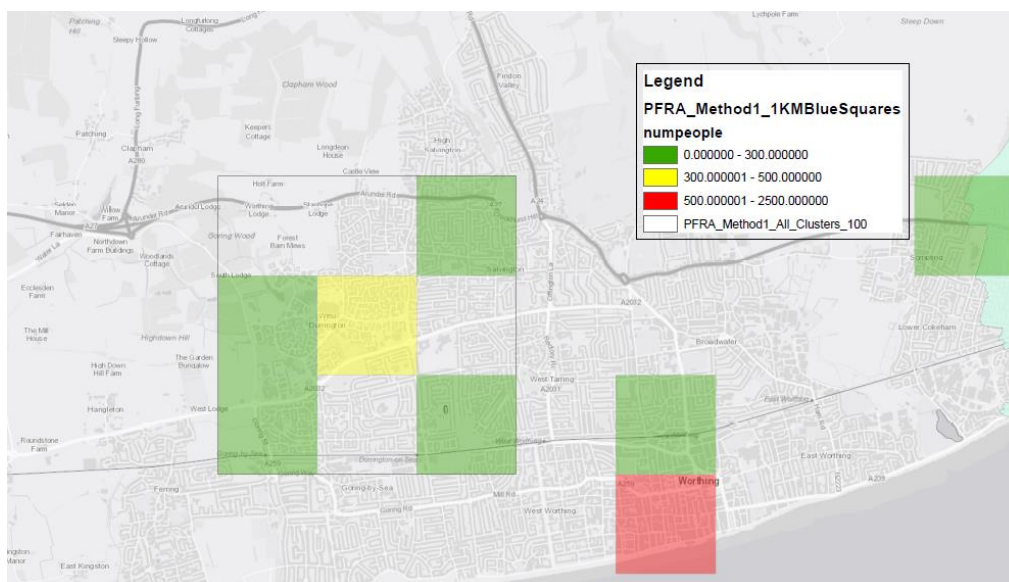


Figure 2: Extract from Preliminary Flood Risk Assessment Mapping 2017

A5: TEVILLE GATE

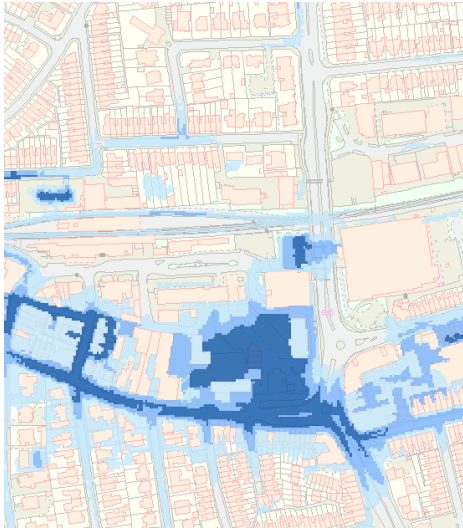


Figure 3: Surface water flood risk in the vicinity of Teville Gate.