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Submission Draft Local Plan – March 2021

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REG 19 CONSULTATION Jan 26th – 23rd Mar 2021**Representation**

Name	Mr Graham Tuppen
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General comments

I am delighted to see that there is a strong intention to protect the Green Gaps. They are essential to the character of Worthing, and keeping the settlements from coalescing. In particular the Eastern gaps, Goring/Ferring and Chatsmore farm, are important for so many reasons; Separation between developed areas. Wildlife. Recreation. Visual setting for the busy coastal path and Highdown Hill/South Downs National Park. Green lung. Valuable farm land - with our departure from the EU I believe we will need to maintain and increase our ability to produce our own food. If we allow any development within these areas, they will be lost forever, we cannot retrieve them. They must be protected.

Comments: Part 1 – Introduction

I am in support of your comments.

Comments: Part 2 - Vision and Strategic Objectives

I fully support your objectives.

Comments: Part 3 - Spatial Strategy

I fully support your arguments.

Comments: Part 4 - Site Allocations

You have correctly identified at-risk areas which need protection.

Part 5 - Development Management Social Policies (DM1-DM9)

I fully agree with your policies.

Part 5 - Development Management Economic Policies (DM10-DM15)

I fully agree.

Part 5 - Development Management Environment Policies (DM16-DM24)

I fully support your aims.

Map Extracts

The areas appear correctly identified.

Participating at the oral part of the examination

No

REG 19 CONSULTATION Jan 26th – 23rd Mar 2021**Representation**

Name	Mr Adrian Cothard
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General comments

Worthing Leisure Centre site has popped in and out of local plans over the years, thankfully out this time. This site, like the Goring Gap MUST receive LOCAL GREEN SPACE DESIGNATION to offer greater protection against housing development. The overarching reasons are - Marine already has an 83% deficiency in open/green space, (3.4ha against a standard of 30ha) the site was gifted via covenant for public and recreational use, there is high groundwater vulnerability, there is no local support whatsoever for housing, it is misleading to imply that the leisure centre can ONLY be replaced with enabling development on this site, traffic congestion is already severe - not helped by overdevelopment around The Strand, this will only get worse if the sites at the adjacent HMRC and Woods Way are developed.

Participating at the oral part of the examination

Yes

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

This site requires greater protection, equal to Goring Gap.

REG 19 CONSULTATION Jan 26th – 23rd Mar 2021**Representation**

Name	Mr Keith Sunderland
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Comments: Part 1 – Introduction

I think that Beeches Road development ought to go ahead if the only real argument against it is the residents do not want it.

Comments: Part 2 - Vision and Strategic Objectives

In line with our commitment as a country to deal with climate change I would like to see all new developments being made to the highest renewable standards. If this means less builders want to bid so be it. Better to have sustainable houses than ones that have to be bought up to the standard later at much more cost. There needs to be clear differentiation between "Affordable" homes and "Social Housing". We need to have homes built for rent at less than market rents.

Comments: Part 4 - Site Allocations

Only that we desperately need housing and if the only reason for not going ahead is residents action we need to ignore it.

Participating at the oral part of the examination

No

REG 19 CONSULTATION Jan 26th – 23rd Mar 2021**Representation**

Name	Mr Peter Hannam
Organisation	Worthing Allotment Management

Part 5 - Development Management Social Policies (DM1-DM9)

Paragraph 5.100 Table 1 Worthing Minimum Provision and Access Standards for Open Space. Allotments. It is stated that the Quality Standards for existing and new provisions is 0.2 hectares / 1000 population. With a population of approximately 110,000, this equates to 22 hectares. There are eight allotment sites in Worthing. The largest are located at the West Tarring site (463 plots) and Chesswood site (321 plots). The National Society of Allotment and Leisure Gardeners suggest a national standard of one allotment per 200 people based on an average plot size of 250 square metres equating to 1,25 square metres per person.. With an estimated population of 110,000, Worthing would need to provide 550 allotments, or 137,500 square metres of allotment land. The eight allotment sites in Worthing total 1,080 plots, but occupy only 124,284 square metres. This is because it has been necessary to reduce plot sizes to meet the burgeoning demand. There are about 470 people on the waiting lists for all eight sites. Any resident within the Borough over the age of 18 may apply to rent an allotment plot. Worthing Borough Council owns all of the allotment land. Seven of the allotment sites are managed by Worthing Allotment Management (WAM), on behalf of Worthing Borough Council. The remaining site in Humber Avenue has yet to determine if it will move to self-management. An additional allotment site is to be generated close to Humber Avenue as a part of the West Durrington housing development. There also exists a small allotment site of nine plots at May Close which belongs to Worthing Homes. So currently Worthing has around 125 square metres of allotment land, which is 12.5 hectares - significantly less than the 22 hectares. It is difficult to see where this shortfall will come from. Access Standards. The existing allotment sites are currently positioned such that many residents would be further than 720 metres away and would have a walk time in excess of 15 minutes.

Participating at the oral part of the examination

No

REG 19 CONSULTATION Jan 26th – 23rd Mar 2021**Representation**

Name	Frances & Graham Barham
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General comments

Re A9 Lyndhurst Road Gasworks 4.29/4.30 N/R

General:

We consider the site to be highly contaminated due to its previous use as a gasworks and being located within a vulnerable groundwater area. We are concerned that the development will not contribute to, is not put at unacceptable risk from, or adversely affected by, unacceptable levels of groundwater pollution from contamination.

The new plans would be a massive over-development of the site. They would have a significant negative impact on the surrounding neighbourhood because of the disproportional height, density, massing and bulk of the proposed buildings. The proposal for any form of “high rise” buildings would be inconsistent with, and permanently damage, the character of the surrounding neighbourhood.

The proposed allocation does not fully recognise the nature of the road network around the site. Park Road is one-way traffic and extremely narrow. This will prove a nightmare for emergency services, delivery vans and residents and a possible safety issue for residents including children. Lyndhurst Road is already (even during Covid restrictions) a very busy road, a major bus route and is the main road to Worthing A&E Hospital. Blue-siren ambulances and police cars, buses and lorries are consistently at a standstill on the Gasworks stretch of road along Lyndhurst Road between Waitrose side and Worthing Hospital, due to heavy traffic. The development would adversely affect highway safety and the convenience of road users.

We appreciate there is a general need for more housing, but that need is for family housing, not tower blocks of small apartments with too little onsite parking. The total Plan (SWWLP – Part 4 – Site Allocations’ Plan) itself recommends 1753 residential units (A1-A15). This amount of new build will place a strain on Worthing’s infrastructure. We all know that the 1753 residential units planned over all will, no doubt, magically expand during the development process, to something well over 2,000 units with very minimal parking provision.

The loss of existing views from neighbouring properties would adversely affect the residential amenity of neighbouring owners.

The site constraints of A9 need to be recognised in respect of the need to be cognisant of the character of the nearby Conservation Areas and Beach House Park to the east.

Such high-density development will have an adverse effect on the residential amenity of its neighbours by reason of noise, disturbance, overlooking, and loss of privacy.

The visual impact of such a proposed high-rise development will detract from the charm which will then discourage visitors who visit Worthing as tourists. The proposed development is over-bearing, out of scale and out of character in terms of appearance compared with existing buildings.

Reasons for objection:

The principal points of objection are:

1. The Regulation 18 version of this Plan indicated a capacity of 85 town houses and flats. The developer is currently consulting on a proposal for 210 one-bedroom flats over 9 storeys with 0.6 parking spaces per flat on this site and propose to submit the planning application in March 2021. These pre-application proposals indicate that, in order to achieve high densities, only one bedroom units are likely to be delivered "...for young commuters working outside Worthing". This does not demonstrate that the site can accommodate the anticipated number of units and still be in accordance with your housing mix policy DM1 and your SHMA which identifies that the most significant need in Worthing is for 2/3 bed housing and for family accommodation. Although Para 5.8 of the Plan indicates that whilst higher density flatted schemes are more likely to deliver smaller properties, it still stresses that they "should also include a proportion of larger units with 3 or more bedrooms". Policy DM1 requires schemes to 'deliver sustainable, mixed and balanced communities'. The current allocation at the densities proposed will not meet policy requirements and is therefore undeliverable.

2. The site constraints of A9 need to be recognised, particularly in respect of the need to be cognisant of the character of the nearby Conservation Areas and Beach House Park to the east. The proposed allocation does not fully recognise the nature of the road network around the site. Park Road is one way and very narrow, Lyndhurst Road is heavily constrained and highly residential in this location. It is already a very busy road and is the main road into the A&E hospital. In view of these constraints we do not believe that the Proposed Allocation for A9 can deliver the indicative capacity without having a dramatic negative impact on the character of the area. It is therefore undeliverable.

3. The capacity of the site will also be dependent on the amount of parking proposed. The pre-application scheme clearly illustrates that the site could not deliver the number of units and the necessary levels of parking for those units. The CPZ is currently oversubscribed and this will be exacerbated by the loss of hospital parking from this site. There needs to be an increased emphasis on the need for the proposals to provide onsite parking to meet the need generated by the development. The belief that "buy a flat – get a free electric bike" will solve everyone's problems – we do not think so. So much of our country is becoming overcrowded, flooded, polluted – do we really need this to happen in Worthing?

The developer/promoter of the site will seek an even higher density than the proposed indicative amount in the draft plan of 150 units. They will argue that the 'abnormal' cost of decontamination will require higher densities to make the development viable. They will also argue that the height of the gas holder justifies nine storeys. As the surrounding area has become more populated over the past years, there is already a strain on services/waiting lists for dentists and doctors in the immediate area.

Given the location of the site, on the edge of the town centre with predominately family housing surrounding it, already constrained roads and parking, close to the hospital, we believe the site should provide a more traditional mix of family homes with sensible parking arrangements and garden/play area for the residents.

Modifications

1. The indicative number of units on the site needs to be greatly reduced. This is justified on the grounds that the higher indicative capacities are undeliverable.

2. Paras 4.29 and 4.30, which set out the site description need to be clear about heritage and local character constraints. This proposed modification is justified on the grounds that it would bring the proposed Allocation A9 in line with the requirements of Policy DM2.

3. There is an inconsistency in how development requirements are expressed for this site. A10 requires the development proposals to "... not have an unacceptable impact on the amenity of

neighbouring residents” and Site A11 requires any redevelopment to “... be sensitive to the surrounding Conservation Areas etc”.

Similar requirements should be included in the list of development requirements for Site A9 and which must the following:

- Protection of the character of the existing area, which is predominately low rise, traditional, family housing.
- Consideration of the two adjacent conservation areas at Warwick Gardens and Little High Street.
- The requirement for a mix of homes that take account of the character of the area and the existing built environment and to properly address local housing needs. Family accommodation with the provision on the development for adequate play area for children and young people.
- The requirement for one parking space per unit plus proportionate Visitor Parking, given the already huge demand for parking in the area. With the loss of the “temporary” Hospital car parking area, any development on the site will greatly reduce the necessary parking places for hospital personnel and this is unacceptable.

Overall, on reading ‘SWWLP – Part 4 – Site Allocations’ we wonder why the Gasworks site is being envisaged as a residential site at all. As the Plan already earmarks 15 local sites for development, including residential planning for 1,603 residential homes (if the A9 allocation of 150 units is excluded), would not this Gasworks site better be utilised for a cluster of family homes and a community development, eg extension of Worthing Hospital facility, Research or nursery facilities? If the forecasters are correct and changes to the environment will inevitably lead to more disease and pandemics in the years to come, surely Worthing wants to prepare for the future and not overload its already overburdened infrastructure.

With the sad closure of many shops, small business and offices in the town centre and the relaxation of planning consents, there may be many other opportunities for the creation of these smaller units to be built in and around the town.

Participating at the oral part of the examination

No

REG 19 CONSULTATION Jan 26th – 23rd Mar 2021

Representation

Name	Mr James Horsley
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Comments: Part 1 – Introduction

Under 1.7 reference is made to roads under Highways England but no comment re consultation with Highways. Two schemes in particular impact on Upper Brighton Road (beeches and Upper B'ton Rod) and it is key if considering either to have an understanding of the future of the A27 and bypass plans. A joined up strategy is needed and given the lack of updates from Highways in recent years Adur and Worthing Councils have a duty to be pushing Highways and the Government for action in this area.

Comments: Part 2 - Vision and Strategic Objectives

There is a lot of comment on climate aims and low carbon and low pollution yet there are developments being included as possibilities that would add traffic to severely congested, and polluted roads such as the A27. A bypass is needed to allow these to even be considered and to improve the health of residents in this part of Worthing, yet no mention of this is made and there seems to be no joined up strategy to be working with Highways and the Government in this area.

Comments: Part 4 - Site Allocations

I am pleased to see that location A1 Beeches Avenue is noted to be problematic in terms of access, and that Beeches Avenue itself is noted to be unsuitable for access. The alternative noted to access via Lyons Farm is also highly impractical. The junction is often gridlocked at times of peak traffic - DIY bank holidays causing gridlock from B&Q and at Christmas the police have to support closing the entrance to Sainsburys car park as queues tail back to the A27 and block traffic. This is in an area in close proximity to a school, and pollution levels are high on the A27. I feel Beeches Ave and Upper Brighton sites can only be explored if a bypass for Worthing is achieved. In the notes re Beeches Avenue mention is made to improve access to Charmandean Lane. This is a historic lane leading to a Bridleway and remnants of a Roman Road but has been abused in recent years, and if the intention is to make more accessible improvements are needed. Southern Water persist in taking various vehicles up/down the lane causing deep rutting and making it impassable in places for pedestrians. This is despite them advising some years ago they were negotiating access via Lyons Farm. Home owners towards the top of Fourth Avenue with properties backing on to the lane have destroyed the historic Charmandean House gates and multiple households are dumping rubbish on the lane affecting drainage and putting other properties at risk of flooding. A series of drains were installed at the base of the lane by Worthing Council to link to the A27 drainage and prevent it from flooding onto the Highway. These have not been maintained for many years, and have not been cleared, so the lane causes regular mud slides onto the main road. Neither Highways or Worthing Council seem to want to take ownership for these, despite them being a council installation and handed on to Highways with the road. Any increased traffic to this lane will need improvements.

Participating at the oral part of the examination

No

REG 19 CONSULTATION Jan 26th – 23rd Mar 2021**Representation**

Name	Mrs Karen Harrison
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Comments: Part 4 - Site Allocations

Beeches Avenue is not suitable for more traffic. Any building in the proposed area would infringe on the SDNP. The air quality is already poor in this area. If the building went ahead as proposed this would lead to more pollution in this area.

Participating at the oral part of the examination

No

REG 19 CONSULTATION Jan 26th – 23rd Mar 2021**Representation**

Name	Mr Bryan Harrison
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Comments: Part 4 - Site Allocations

OS2 - Land North of Beeches Avenue. 1. Beeches Avenue is very often awash with surface runoff when it rains heavily. So much so that the junction of Beeches Avenue and the A27 Upper Brighton Road is flooded, even after the remedial work carried out on the drainage system. Further development above Beeches Avenue and First Avenue will only aggravate the situation and could lead to more serious flooding of resident's property. 2. This development would abut the South Downs National Park; an area that is designated, at least in part, as a 'dark sky reserve' and indeed hosts the South Downs Dark Sky Festival. Having up to 150 dwellings on this site and the Worthing Football Club ground will severely degrade the dark sky status. Not to mention the detrimental effect on the local wildlife including bats and tawny owls. Even if suitable street lights are installed, and they are turned off in the early hours like they are in Beeches Avenue, residents will still install improper security/garden lighting. 3. Access onto the A27 Upper Brighton Road is already a nightmare during rush hour traffic. Adding another 200 - 400 cars joining at this point is unsustainable, even with the ridiculous Highways Agency plan for developing the A27 through Worthing. The only possible access to the development would be through Lyons Farm Retail Area and that is often backed up half way round B&Q carpark and into Sainsbury's carpark at the weekend. People then end up running the Red lights at the junction with the A27 just to get out of the retail area. Hundreds more cars going into and out of this area will degenerate into complete gridlock.

Participating at the oral part of the examination

No

REG 19 CONSULTATION Jan 26th – 23rd Mar 2021**Representation**

Name	Patricia Stevens
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Comments: Part 2 - Vision and Strategic Objectives

With so many opportunities currently to consider a new town centre vision with a mixed use of vacant property for business & residential purposes, it doesn't seem the time to prioritise new build on a green field site such as Beeches Avenue.

Comments: Part 4 - Site Allocations

Part 4, Beeches Avenue: Completely agree about the previously made difficulties of access along Beeches Avenue. This would be an unacceptable level of traffic both up to the new site & out on to the A27. The car repairers are not a great business to have at the back of a residential area & the storage of portable toilets quite unsuitable, whether or not there is a new housing development. I agree with previous objections about the volume of traffic that would result from a new development if the access route in & out were through Lyons Farm even if a new home could be found for the football ground. With this amount of new houses each possibly with 2 cars, the extra pressure on egress to the A27 would be lot worse than it is now & it is slow already.

Participating at the oral part of the examination

No

REG 19 CONSULTATION Jan 26th – 23rd Mar 2021**Representation**

Name	Mr Trevor Holden
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Comments: Part 4 - Site Allocations

Site A9 (p88) para 4.29/4.30 I am broadly in favour of development. This has been a post industrial site for far too long. I would like my voice to be heard.

Map Extracts

A9 para 4.29/4.30 I live adjacent to site and am broadly in favour of development. It has been a post industrial site for as long as I can remember, and frankly I would welcome almost any development.

Participating at the oral part of the examination

Yes

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Because we live right on the margin of the site and I believe there are campaigners who are not so local making unrealistic and even untrue claims. Our family have lived in the street since 1969 and to be honest some of the comments being made are ridiculous.

REG 19 CONSULTATION Jan 26th – 23rd Mar 2021**Representation**

Name	Poppy Milner-Smith
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Comments: Part 4 - Site Allocations

I have concerns about the current proposal for 150 one bedroom flats. I believe this is a gross overdevelopment of the site and is in no way supportive of Worthing's need for more family housing. This is purely directed at investors and seeks to achieve maximum profit for the developers with no benefit to the town and our lack of 2/3 bed housing. The proposal for 0.6 allocated parking for this development will further disturb an already congested area with limited spaces for residents, visitors to the town centre and most importantly hospital workers/ patients. A reduction in proposed units would immediately rectify this issue.

The size of the proposed development also concerns me as a local resident. Given the site's previous use and noted contamination issues. Developing to such a large extent will no doubt have much greater implications for displacement of contaminated land and I therefore have great concern about any health implications to residents living by the site. As well as its ability to blend in with the near by conservation areas.

I am in support of development of the site and the need to provide more housing in the area. However I feel the number of proposed homes are not appropriate for the needs of the town and the distinct lack of parking will have huge implications for the surrounding area. I believe both areas must be addressed in order for the site to meet regulations of the plan and Worthing's housing policy.

Participating at the oral part of the examination

Yes

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Local resident with interest in development of site and concerned about current proposed plans.

REG 19 CONSULTATION Jan 26th – 23rd Mar 2021**Representation**

Name	Stella Vasileva
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General comments

Although I support the principle of development on this site for much needed family housing and in particular the policy requirement to 'address contamination issues' and to provide 'high quality residential', the Policy is not sound. This is because I do not believe the indicative capacity has taken into account the constraints of the site. I believe that a development at the density proposed cannot be achieved whilst still meeting the other policy requirements set out in the Plan including DM1 and DM2 and therefore the current allocation is undeliverable.

Reasons for objection 1.

The site cannot deliver the capacity of homes identified. The Regulation 18 version of this Plan indicated a capacity of 85 town houses and flats. In order to achieve the new indicative number of 150 units it is highly likely that any future redevelopment scheme would only comprise a flatted development. Indeed, it is interesting to note that the developer is currently consulting on a proposal for 210 one-bedroom flats over 9 storeys with 0.6 parking spaces per flat on this site. They propose to submit the planning application in March 2021. The pre-application proposals are helpful in that they clearly illustrate that in order to achieve high densities only one bed units are likely to be delivered. It has therefore not been clearly demonstrated that this site can accommodate the anticipated number of units and still be in accordance with your housing mix policy DM1 and your SHMA which identifies that the most significant need in Worthing is for 2/3 bed housing. Although Para 5.8 of the Plan indicates that whilst higher density flatted schemes are more likely to deliver smaller properties, it still stresses that they "should also include a proportion of larger units with 3 or more bedrooms". Policy DM1 requires schemes to 'deliver sustainable, mixed and balanced communities'. The current allocation at the densities proposed will not be able to meet other policy requirements and is therefore undeliverable.

2. I acknowledge that development proposals must make the most efficient use of land and I support Policy DM2 - Density. I support the fact that Policy DM2 makes clear that the capacity of any site must be based on a design led approach which consider the site context and character. The site constraints of A9 need to be recognised, particularly in respect of the need to be cognisant of the character of the nearby Conservation Areas and Beach House Park to the east. The proposed allocation does not fully recognise the nature of the road network around the site. Park Road is one way and very narrow, Lyndhurst Road is heavily constraint and highly residential in this location. It is a very busy road and is the main road to the A&E hospital. In view of these constraints I do not believe that the Proposed Allocation for A9 can deliver the indicative capacity without having a dramatic negative impact on the character of the area. It is therefore undeliverable.

3. The capacity of the site will also be dependent on the amount of parking proposed. The pre-application scheme clearly illustrates that the site could not deliver the number of units and the necessary levels of parking. The CPZ is currently oversubscribed and this will be exacerbated by the loss of hospital parking from this site. There needs to be an increased emphasis on the need for the proposals to provide either onsite parking to meet the need generated by the development or onsite measures to encourage sustainable transport and offsite contributions.

Comments: Part 4 - Site Allocations

1. The indicative number of units on the site needs to be reduced. This proposed modification is justified on the grounds that the higher indicative capacities are undeliverable.
2. Paras 4.29 and 4.30, which set out the site description need to be clear about heritage and local character constraints. This proposed modification is justified on the grounds that it would bring the proposed Allocation A9 in line with the requirements of Policy DM2.
3. There is an inconsistency in how development requirements are expressed for this site allocations. I note that Site A10 requires the development proposals to “not have an unacceptable impact on the amenity of neighbouring residents” and Site A11 requires any redevelopment to “be sensitive to the surrounding Conservation Areas etc”. Similar requirements should be included in the list of development requirements for Site A9 and should include the following: • protection the character of the existing area, which is predominately low rise, family housing; • consideration of the two adjacent conservation areas at Warwick Gardens and Little High Street; • the requirement for a mix of homes that take account of the character of the area and the existing built environment and to properly address local housing need.
4. The requirement of 1 parking space per unit given the huge demand for parking in the area. Alternatively, the policy must emphasise the need for the proposals to provide onsite measures to encourage sustainable transport and provide offsite contributions
5. The photograph in the draft Local Plan needs to be replaced with an up to date picture. The gas holder was removed many years ago.

Participating at the oral part of the examination

Yes

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

I believe the developer/promoter of the site will seek an even higher density than the proposed indicative amount in the draft plan of 150 units. They will argue that the ‘abnormal’ cost of decontamination will require higher densities to make the development viable. They will also argue that the height of the gas holder justifies nine storeys. Many people have moved into the area since the holder was removed many years ago. I do not think the density levels should be increased. Given the location of the site, on the edge of the town centre with predominately family housing surrounding it, already constrained roads and parking, close to the hospital, I believe the site should provide a mix of homes. Furthermore, proper consideration should be given to the provision of onsite parking and/or the provision of onsite measures to encourage sustainable transport.

REG 19 CONSULTATION Jan 26th – 23rd Mar 2021**Representation**

Name	Steve Limbrey
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General comments

In general I approve of the plan and am especially pleased to see the commitment to sustainable development and climate change adaptation / mitigation. Whilst I understand the difficulties in reconciling nationally set housing targets with what can actually be provided on the ground and appreciate the stance taken in the plan, I do have some concerns about the housing mix and density proposed.

Comments: Part 2 - Vision and Strategic Objectives

SO1 - Does this objective take account of changes to types of housing required following the pandemic? Recent studies have indicated less desire for flats and increased requirement for houses - possibly driven by needing space to work from home.

SO17 - I am concerned that the use of the word "Maximise" here does not encourage excessive density.

SO19, 20 and 21 - I am very pleased to see these included and strongly support them together with SP2 and SP3. Good to see recognition of local food production under SP3 vi

Under 2.30 I am pleased to see noise pollution included here but would seek clarification as to what noise is included. Town centre events such as concerts in Steyne Gardens or firework displays can cause significant distress to some long standing residents.

Comments: Part 3 - Spatial Strategy

Under SS2 site allocations, whilst I sympathise with the difficulties in meeting need and pressure from national government to have even larger provision (s3.27), the original allocation for A9 Lyndhurst Road was I understand for 85 units. I have concerns that 150 units is too many for this site, especially in view of post covid changing housing requirements with larger houses being preferred over flats. The only way of putting 150 units on this site is to build up which would be out of keeping with the surrounding area and detract from the amenity of existing residents. I also have concerns that the prospective developer will push for this 150 figure to be increased even further and would like reassurance that this would not happen.

Comments: Part 4 - Site Allocations

A9 Lyndhurst Road. Whilst I support the development of this site for much needed family housing together with the intention to address contamination problems I do have concerns that the indicative capacity ignores the constraints of the site. I do not think that a development at the proposed density can be achieved whilst still meeting other policy requirements from the plan including DM1 and DM2.

CAPACITY:- The regulation 18 version of this plan indicated a capacity of 85 town houses and flats. In order to achieve the indicative number of 150 units it is highly likely that this would have to consist entirely of flats. A recent consultation by the developer, Berkeley Homes, indicated that they were planning on 210 one-bedroom flats over 9 storeys with very little (0.6 spaces per flat) parking provision. This consultation is helpful in that it clearly demonstrates that in order to achieve such high densities it can only be done by building one bedroom flats and furthermore that it conflicts with your housing mix policy DM1 and your SHMA identifying that the most significant need in the town is for 2/3 bed housing. Whilst 5.8 in the plan states that whilst higher density flat schemes are more likely to deliver smaller properties, it still stresses that they "should also include a proportion of larger units with 3 or more bedrooms" Policy DM1 requires schemes to "deliver sustainable, mixed and balanced communities". The current allocation of 150 units, let alone the developers preferred 210 units therefore does not meet other policy requirements and as such is undeliverable. I would therefore suggest that the indicative units proposed in the plan be reduced from 150.

LOCAL AREA:- In general I support policy DM2 which makes it clear that the capacity of any site must be based on a design led approach which considers the site context and character. With regards to A9 site constraints need to be recognised, in particular taking into account the nearby conservation areas and Beach House park to the east. The proposed allocation does not fully recognise the nature of the local road network surrounding the site. In particular Park Road is one way and very narrow, Lyndhurst Road is very constrained and highly residential at this point as well as being the main access route to Worthing Hospital. I do not believe therefore that the proposed allocation for A9 can deliver the proposed number of units without having a significant negative effect on the character of the area and as such is undeliverable. I would therefore suggest that to bring A9 in line with the requirements of DM2 that paras 4.29 and 4.3 are re-worded to be clear about heritage and local character constraints. In addition there is a lack of consistency with other allocations. A10 for example requires that the development "not have an unacceptable impact on the amenity of neighbouring residents" whilst A11 requires "any development to be sensitive to the surrounding conservation areas etc". Similar requirements should be added to those for A9 and include:- Protecting the character of the existing area which is mostly low rise , family housing; Consideration of the 2 adjacent conservation areas of Warwick Gardens and Little High Street; The requirement of a mix of homes that take account of the character of the area and the existing built environment and which properly addresses local housing need.

PARKING:- The capacity of the site will also be dependant on the amount of parking proposed. Whilst I welcome the intention to promote more sustainable travel and reduced car use with initiatives such as car clubs, in reality for the foreseeable future people will still desire to own their own cars. The consultation with Berkeley Homes clearly demonstrates that the site could not deliver the number of units together with a realistic level of parking provision. The local CPZ is already heavily over-subscribed and this will get worse once the existing hospital parking on the site disappears. The needs to be an increased emphasis on the need for the proposals to provide either sufficient on-site parking of 1 space per unit or on-site measures to encourage sustainable transport and offsite contributions.

Part 5 - Development Management Social Policies (DM1-DM9)

DM1 - I fully support this, in particular section 2 that houses should be able to meet changing needs over time .Where possible this should include design that allows simple adaptation for disability, including being suitable for wheelchair use. I have some concerns that high rise developments can lead to isolation of the disabled and that problems can occur where, for example, broken lifts lead to residents being trapped on upper floors.

I also support DM5 over quality of the built environment.

Part 5 - Development Management Economic Policies (DM10-DM15)

DM12 - Whilst I generally support this, I have some concerns that any enhancement of the night time economy should not be at the expense of local residents. Recent examples have been the introduction of evening charging at seafront car parks such as Beach House meaning that surrounding on street parking is not available to residents (this could be easily rectified by extending the operating hours of the CPZ). Additionally noise levels and anti-social behaviour has been increasing to the detriment of town centre residents. In particular several pubs now "pump" music to outside speakers which should be discouraged.

Part 5 - Development Management Environment Policies (DM16-DM24)

In general I am very pleased to see the emphasis on environment and sustainability and think you have some excellent policies here.

DM16 - I am fully supportive of this but think it should also have a section on designed in mitigation measures such as raised electrics and flood resistant floors and walls. This could also possibly come under DM20.

Participating at the oral part of the examination

No

REG 19 CONSULTATION Jan 26th – 23rd Mar 2021

Representation

Name	Gillian Limbrey
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General comments

In general a good plan and I welcome the emphasis on sustainability and climate change adaption.

Comments: Part 4 - Site Allocations

A9 Lyndhurst Road. Whilst I support the development of this site for much needed family housing together with the intention to address contamination problems I do have concerns that the indicative capacity ignores the constraints of the site. I do not think that a development at the proposed density can be achieved whilst still meeting other policy requirements from the plan including DM1 and DM2.

CAPACITY:- The regulation 18 version of this plan indicated a capacity of 85 town houses and flats. In order to achieve the indicative number of 150 units it is highly likely that this would have to consist entirely of flats. A recent consultation by the developer, Berkeley Homes, indicated that they were planning on 210 one-bedroom flats over 9 storeys with very little (0.6 spaces per flat) parking provision. This consultation is helpful in that it clearly demonstrates that in order to achieve such high densities it can only be done by building one bedroom flats and furthermore that it conflicts with your housing mix policy DM1 and your SHMA identifying that the most significant need in the town is for 2/3 bed housing. Whilst 5.8 in the plan states that whilst higher density flat schemes are more likely to deliver smaller properties, it still stresses that they "should also include a proportion of larger units with 3 or more bedrooms" Policy DM1 requires schemes to "deliver sustainable, mixed and balanced communities". The current allocation of 150 units, let alone the developers preferred 210 units therefore does not meet other policy requirements and as such is undeliverable. I would therefore suggest that the indicative units proposed in the plan be reduced from 150.

LOCAL AREA:- In general I support policy DM2 which makes it clear that the capacity of any site must be based on a design led approach which considers the site context and character. With regards to A9 site constraints need to be recognised, in particular taking into account the nearby conservation areas and Beach House park to the east. The proposed allocation does not fully recognise the nature of the local road network surrounding the site. In particular Park Road is one way and very narrow, Lyndhurst Road is very constrained and highly residential at this point as well as being the main access route to Worthing Hospital. I do not believe therefore that the proposed allocation for A9 can deliver the proposed number of units without having a significant negative effect on the character of the area and as such is undeliverable. I would therefore suggest that to bring A9 in line with the requirements of DM2 that paras 4.29 and 4.3 are re-worded to be clear about heritage and local character constraints. In addition there is a lack of consistency with other allocations. A10 for example requires that the development "not have an unacceptable impact on the amenity of neighbouring residents" whilst A11 requires "any development to be

sensitive to the surrounding conservation areas etc". Similar requirements should be added to those for A9 and include:- Protecting the character of the existing area which is mostly low rise , family housing; Consideration of the 2 adjacent conservation areas of Warwick Gardens and Little High Street; The requirement of a mix of homes that take account of the character of the area and the existing built environment and which properly addresses local housing need.

PARKING:- The capacity of the site will also be dependant on the amount of parking proposed. Whilst I welcome the intention to promote more sustainable travel and reduced car use with initiatives such as car clubs, in reality for the foreseeable future people will still desire to own their own cars. The consultation with Berkeley Homes clearly demonstrates that the site could not deliver the number of units together with a realistic level of parking provision. The local CPZ is already heavily over-subscribed and this will get worse once the existing hospital parking on the site disappears. The needs to be an increased emphasis on the need for the proposals to provide either sufficient on-site parking of 1 space per unit or on-site measures to encourage sustainable transport and offsite contributions.

Participating at the oral part of the examination

No

REG 19 CONSULTATION Jan 26th – 23rd Mar 2021**Representation**

Name	Alison Chapman
Organisation	Goring Residents Association

General comments

I think the plan is sound and that all appropriate opportunities for consultation have taken place. It is imperative that protection is given to Worthing's green spaces and gaps as identified in the plan.

REG 19 CONSULTATION Jan 26th – 23rd Mar 2021**Representation**

Name	Alan Wilcox
Organisation	Goring Residents Association

General comments

Worthing covers 31 sq kilometres and it is the most densely populated authority in the whole of West Sussex with 3,116 people per sq kilometre. It is therefore excellent that the Local Plan has taken this into account in protecting what little green space we have left in our area. The emphasis on developing brown field sites to go as far as practical to meet local housing demands is very well thought through.

Participating at the oral part of the examination

No

REG 19 CONSULTATION Jan 26th – 23rd Mar 2021**Representation**

Name	Jo Edwards
Organisation	Sport England
Address	21 Bloomsbury Street, London, WC1B 3HF
Email	jo.edwards@sportengland.org

General comments

Sport England along with Public Health England have prepared revised guidance 'Active Design' which we consider has considerable synergy the Plan and DM7, DM8 and DM15. It may therefore be useful to provide a cross-reference (and perhaps a hyperlink) to www.sportengland.org/activedesign

Sport England believes that being active should be an intrinsic part of everyone's life pattern.

- The guidance is aimed at planners, urban designers, developers and health professionals. • The guidance looks to support the creation of healthy communities through the land use planning system by encouraging people to be more physically active through their everyday lives.
- The guidance builds on the original Active Designs objectives of Improving Accessibility, Enhancing Amenity and Increasing Awareness (the '3A's'), and sets out the Ten Principles of Active Design.

• Then Ten Active Design Principles have been developed to inspire and inform the design and layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and physical activity and active lifestyles. • The guide includes a series of case studies that set out practical real-life examples of the Active Design Principles in action. These case studies are set out to inspire and encourage those engaged in the planning, design and management of our environments to deliver more active and healthier environments. • The Ten Active Design Principles are aimed at contributing towards the Governments desire for the planning system to promote healthy communities through good urban design. The developer's checklist (Appendix 1) has been revised and can also be accessed via www.sportengland.org/activedesign Sport England would encourage development in Worthing be designed in line with the Active Design principles to secure sustainable design. This could be evidenced by use of the checklist.

MODEL POLICY FOR ACTIVE DESIGN

A suggested model policy for Local Plans and Neighbourhood Plans is set out below

The design and masterplanning of development proposals will embrace the role they can play in supporting healthy lifestyles by facilitating participation in sport and physical activity. To do so they will, as far as is relevant to the specific development proposal, adhere to the following Active Design principles: Activity for All Enabling those who want to be physically active whilst encouraging those who are inactive to become active. Walkable Communities Creating the conditions for active travel between all locations. Connected Walking, Running and Cycling Routes Prioritising active travel through safe integrated walking, running and cycling routes. Co-Location of Community Facilities Creating multiple reasons to visit a destination and minimising the number and length of trips and increasing the awareness and convenience of opportunities to participate in sport and physical activity opportunities. Network of Multifunctional Open Space Providing multi-functional spaces opens up opportunities for sport and physical activity and has numerous wider benefits. High Quality Streets and Spaces Well designed streets and spaces support and sustain a broader variety of users and community activities. Supporting Infrastructure Providing and facilitating access to facilities and other infrastructure to enable all members of society to take part in sport and physical activity. Active Buildings. Providing opportunities for activity inside and around buildings, rather than just between buildings. Management and Maintenance A high standard of maintenance is essential to ensure the long term attractiveness of sports facilities along with open and public spaces.

Comments: Part 4 - Site Allocations

A1 Beeches Avenue – note and welcomes the football ground being excluded from the allocation until / unless a suitable replacement site is identified. Sport England should be consulted on any proposal for access that might compromise or negatively affect the operation of the football club. In any future review of the LP should the Council be minded to include the football ground within the development site allocation, Sport England would object to the loss of the playing field / pitch unless one of the exceptions in its Playing Field Policy was met https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport?section=playing_fields_policy

Part 5 - Development Management Social Policies (DM1-DM9)

DM7 - support

Part 5 - Development Management Economic Policies (DM10-DM15)

DM15 - support

Participating at the oral part of the examination

No

REG 19 CONSULTATION Jan 26th – 23rd Mar 2021

Representation

Name	Steve Limbrey
Organisation	Transition Town Worthing CIC
Address	c/o Community Works, Worthing Town Hall, Worthing, BN11 1HA
Email	info@ttworthing.org

General comments

As an organisation that runs sustainability projects in the town we are pleased to note the emphasis in the plan on climate change and sustainability and fully support this.

Comments: Part 1 – Introduction

Para 1.52 - We fully support this as an overarching requirement.

Comments: Part 2 - Vision and Strategic Objectives

We fully support the emphasis in V1 to V6 on climate change, sustainability and increasing natural capital together with the principals in the strategic objectives. With regards to SO9 and SO10 we would like to see an emphasis on encouraging independent retailers rather than national chains. We also fully support SP2 and are pleased to note environmental considerations have been included under SP3 v.

Comments: Part 3 - Spatial Strategy

SS1 - We are pleased to see a commitment to protect the strategic gaps however have some concerns regarding the inclusion of 6 Greenfield edge of town sites. We appreciate the difficulties in trying to meet NPPF targets and welcome the plan's greatly reduced target but feel that using Greenfield sites is not the way forward. SS2 - We feel that some of the site allocations may be excessive resulting in too high a density and properties that are too small or which can only be achieved by over reliance on flats. SS6 - We fully support these areas being designated as local green space.

Comments: Part 4 - Site Allocations

We do not support A1 as we object to the loss of a green field site and have concerns over the protection of the SPZ. We do not support the inclusion of A6 due to loss of greenfield and possible effects on flood protection as well as the proximity to a local wildlife site. We do not support the

inclusion of A13 due to proximity to ancient woodland, impact on landscape character and impact on then local wildlife site. We do not support the inclusion of A15 due to proximity to the national park, loss of Greenfield / agricultural land, reduction of the gap between Worthing and Sompting contrary to SS1 d iii, and impact on the Sompting Village Conservation Area.

Part 5 - Development Management Social Policies (DM1-DM9)

DM2 - We have concerns that setting a minimum density rate will encourage loss of important urban green space due to reduced garden sizes and is contrary to the policy of trying to increase bio-diversity and of trying to encourage local food production. In our view this should include food grown at home.

Part 5 - Development Management Economic Policies (DM10-DM15)

DM15 - We fully support this policy and are pleased to see the emphasis on climate change and the environment.

Part 5 - Development Management Environment Policies (DM16-DM24)

DM16 to DM22 - We fully support these policies and are pleased to see the emphasis on climate change and the environment.

Participating at the oral part of the examination

No

REG 19 CONSULTATION Jan 26th – 23rd Mar 2021**Representation**

Name	Sarah Collier
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General comments

I am commenting on the draft plans for the land north of Beeches Avenue (A1). I am a resident of Charmandean and use the A27 on a daily basis. I also regularly use the retail units at Lyons Farm. The proposed housing development would have an obvious negative impact on the already congested Lyons Farm junction and A27 in general; this stretch of road is frequently at a standstill during peak periods. For this reason I also am concerned about further negative impact on the air quality in this area. I note that the football club would need to be relocated. Goes without saying, this has a serious impact on the local community. The issue raised on the draft plan about possible effects on the drinking water supply is obviously of concern being a local resident. Lastly I am concerned about the loss of green areas on the periphery of existing residential areas - not only the impact on air quality but also the potential loss of wildlife habitats and disturbance to wild birds.

Participating at the oral part of the examination

No

Chris Thomas
Outdoor Advertising Consultant

Ref: SDWLP-20

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

26 January 2021

Dear Sir/Madam,

Worthing BC - Local Plan 2020-2036 - Submission Draft

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 DM6(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 5.83, second and third sentences, encapsulate all that need be said about advertisement control. When read with the requirements of Policy DM5 "Quality of Built Environment" (of which advertisements are a part), the relevant considerations will apply.

Policy DM6, 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 DM6(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 DM6(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 DM6(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 & Graphics Association

Office use Only	
Comment number	SDWLP-21
Date received	27.01.21

Submission Draft Worthing Local Plan January 2021

Regulation 19 (Publication Stage) Comments Form

This consultation runs from Tues 26th Jan to Tues 23rd March 2021

How to submit your comments

This response form has two parts:

- Part A: Personal Details
- Part B: Your representation(s)

Both Part A and Part B of the form need to be completed in order for your representation(s) to be valid. Please fill in a separate sheet for each representation (Part B) you wish to make. You do not need to fill out Part A for each representation provided that all representations made are securely attached.

Forms must be returned by the latest 5pm Tuesday 23rd March 2021

You can complete this form on-line: www.adur-worthing.gov.uk/worthing-local-plan

Or return a hard copy of the form:

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

Or by e-mail to: planning.policy@adur-worthing.gov.uk

Further guidance

The Local Plan, the evidence base and all supporting documents are published on the Council's website (see link above). This includes a Guidance Note on how to make effective representations and you are advised to read this before making any comments. At this stage (Regulation 19) comments should only relate to whether you consider the Plan complies with legal requirements, including the duty to cooperate, and whether the document is sound.

If you require any advice on completing this form please feel free to contact the Planning Policy Team via email (as above) or telephone on 01273 263000.

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

Part A - Contact Details			
First name	Rosie		
Last name	O'Hara		
Organisation	N/A		
Address line	[REDACTED]		
Address line			
Town	[REDACTED]		
Postcode	[REDACTED]	Telephone	[REDACTED]
Email	[REDACTED]		

Signed	[REDACTED]	Date	27/01/2021
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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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<u>Use of information</u>
<p>All data will be stored securely in line with the GDPR. 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. We cannot accept or report confidential or anonymous responses. Further information about how personal information is processed can be found in the Planning Policy Privacy Notice:</p> <p>https://www.adur-worthing.gov.uk/planning-policy/privacy-notice/</p>

Part B
Please use a separate sheet for each representation

To which part of the Submission Draft Local Plan does this representation relate?

Policy

Site
Allocation
part 4

Paragraph

Page 72

Map
Extract

Do you consider the Submission Draft Local Plan:

Legally compliant?

Yes

No

Don't know

Sound?

Yes

No

Don't know

**Complies with the Duty to
Cooperate?**

Yes

No

Don't know

Please give details of why you consider the Submission Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Submission Draft Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Part 4 Site Allocation page 72 – Proposal for 90 Houses field at the north end of Beeches Avenue Worthing.

I wish to make an objection to the above mentioned plans due to the following concerns.

The A27 cannot cope with any additional traffic feeding on it between the Grove Lodge roundabout and Lyons farm junction. This development would mean at least an additional 90 vehicles joining this road at this point, the road cannot cope now and would bring this to a standstill. Currently this bottleneck on the A27 produces daily long queues, delays and pollution.

Potential of flooding – This beautiful field absorbs a huge amount of rainwater, however when we have long spells of rain there is flooding now at the bottom of Beeches Avenue where it joins the A27. You have only got to drive along the A27 to see this. This would get far worse if the current level of rainfall cannot be absorbed by the field having being replaced by concrete and houses.

For the sake of 90 dwellings this would have an enormous negative impact on our countryside and animals habitat. Currently this field and the surrounding fields are homes to hedgehogs, foxes, badgers and deer, also to smaller creatures like toads, frogs and insects etc. etc. We are losing so many of our beautiful fields and whilst I understand the need for housing I feel this application is totally unnecessary and before this goes any further I would like consideration given to the number of brown field sites in Worthing, buildings such as Beales, Debenhams. This would improve our sad run down town centre plus as you drive around Worthing there are many sites which could be converted and provide housing, again this would enhance Worthing as some of these sites are run down eye sores. I also fear that this would not be the end to the development and if this was approved the surrounding fields would also be engulfed.

Surely, if there is one thing that this terrible Coronavirus situation has taught us is that we need green spaces to enjoy for all our wellbeing, nature and must be preserved. No doubt you are aware of the negative impact this type of development would have on our local area to conservation and global warming. We must exhaust all possibilities before developing any more of our precious countryside and I therefore pleading to you to re-consider this plan.

I look forward to hearing from you and being kept up to date with this proposal.

Many thanks

Rosie O'Hara

(continue on a separate sheet/expand box if necessary)

Please set out what modification(s) you consider necessary to make the Submission Draft Local Plan legally compliant or sound, having regard to the matter you have identified above where this relates to soundness. You will need to say why this modification will make the Submission Draft Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See my note above, I consider this plan unacceptable and I do not wish it to be approved.

(continue on a separate sheet/expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes

n/a


NO

n/a

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: The inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date:

27/01/2021

Office use Only	
Comment number	SDWLP-22
Date received	08.02.21

Submission Draft Worthing Local Plan January 2021

Regulation 19 (Publication Stage) Comments Form

This consultation runs from Tues 26th Jan to Tues 23rd March 2021

How to submit your comments

This response form has two parts:

- Part A: Personal Details
- Part B: Your representation(s)

Both Part A and Part B of the form need to be completed in order for your representation(s) to be valid. Please fill in a separate sheet for each representation (Part B) you wish to make. You do not need to fill out Part A for each representation provided that all representations made are securely attached.

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If you require any advice on completing this form please feel free to contact the Planning Policy Team via email (as above) or telephone on 01273 263000.

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

Part A - Contact Details			
First name	Judy		
Last name	Holmes		
Organisation	N/A		
Address line	[REDACTED]		
Address line			
Town	[REDACTED]		
Postcode	[REDACTED]	Telephone	
Email	[REDACTED]		

Signed		Date	
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Note: Unless you request otherwise <i>(by putting a cross in the box to the right)</i> , 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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<p style="text-align: center;"><u>Use of information</u></p> <p>All data will be stored securely in line with the GDPR. 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. We cannot accept or report confidential or anonymous responses. Further information about how personal information is processed can be found in the Planning Policy Privacy Notice:</p> <p style="text-align: center;">https://www.adur-worthing.gov.uk/planning-policy/privacy-notice/</p>
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Part B
Please use a separate sheet for each representation

To which part of the Submission Draft Local Plan does this representation relate?

Policy	A9	Paragraph	4.29/4.30	Map Extract	N/R
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Do you consider the Submission Draft Local Plan:

Legally compliant?	Yes	X		No	
	Don't know				
Sound?	Yes			No	X
	Don't know				
Complies with the Duty to Cooperate?	Yes	X		No	
	Don't know				

Please give details of why you consider the Submission Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Submission Draft Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Although I support the principle of development on this site for much needed family housing and in particular the policy requirement to 'address contamination issues' and to provide 'high quality residential', the Policy is not sound. This is because I do not believe the indicative capacity has taken into account the constraints of the site. I believe that a development at the density proposed cannot be achieved whilst still meeting the other policy requirements set out in the Plan including DM1 and DM2 and therefore the current allocation is undeliverable.

Reasons for objection

1. The site cannot deliver the capacity of homes identified. The Regulation 18 version of this Plan indicated a capacity of 85 town houses and flats. In order to achieve the new indicative number of 150 units it is highly likely that any future redevelopment scheme would only comprise a flatted development. Indeed, it is interesting to note that the developer is currently consulting on a proposal for 210 one-bedroom flats over 9 storeys with 0.6 parking spaces per flat on this site. They propose to submit the planning application in March 2021. The pre-application proposals are helpful in that they clearly illustrate that in order to achieve high densities only one bed units are likely to be delivered. It has therefore not been clearly demonstrated that this site can accommodate the anticipated number of units and still be in accordance with your housing mix policy DM1 and your SHMA which identifies that the most significant need in Worthing is for 2/3 bed housing. Although Para 5.8 of the Plan indicates that whilst higher density flatted schemes are more likely to deliver smaller properties, it still stresses that they "should also include a proportion of larger units with 3 or more bedrooms". Policy DM1 requires schemes to 'deliver sustainable, mixed and balanced communities'. The current allocation at the densities proposed will not be able to meet other policy requirements and is therefore undeliverable.

2. I acknowledge that development proposals must make the most efficient use of land and I support Policy DM2 - Density. I support the fact that Policy DM2 makes clear that the capacity of any site must be based on a design led approach which consider the site context and character. The site constraints of A9 need to be recognised, particularly in respect of the need to be cognisant of the character of the nearby Conservation Areas and Beach House Park to the east. The proposed allocation does not fully recognise the nature of the road network around the site. Park Road is one way and very narrow, Lyndhurst Road is heavily constraint and highly residential in this location. It is a very busy road and is the main road to the A&E hospital. In view of these constraints I do not believe that the Proposed Allocation for A9 can deliver the indicative capacity without having a dramatic negative impact on the character of the area. It is therefore undeliverable.
3. The capacity of the site will also be dependent on the amount of parking proposed. The pre-application scheme clearly illustrates that the site could not deliver the number of units and the necessary levels of parking. The CPZ is currently oversubscribed and this will be exacerbated by the loss of hospital parking from this site. There needs to be an increased emphasis on the need for the proposals to provide either onsite parking to meet the need generated by the development or onsite measures to encourage sustainable transport and offsite contributions.

(continue on a separate sheet/expand box if necessary)

Please set out what modification(s) you consider necessary to make the Submission Draft Local Plan legally compliant or sound, having regard to the matter you have identified above where this relates to soundness. You will need to say why this modification will make the Submission Draft Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

1. The indicative number of units on the site needs to be reduced. This proposed modification is justified on the grounds that the higher indicative capacities are undeliverable.

2. Paras 4.29 and 4.30, which set out the site description need to be clear about heritage and local character constraints. This proposed modification is justified on the grounds that it would bring the proposed Allocation A9 in line with the requirements of Policy DM2.

3. There is an inconsistency in how development requirements are expressed for this site allocations. I note that Site A10 requires the development proposals to “not have an unacceptable impact on the amenity of neighbouring residents” and Site A11 requires any redevelopment to “be sensitive to the surrounding Conservation Areas etc”. Similar requirements should be included in the list of development requirements for Site A9 and should include the following:
 - protection the character of the existing area, which is predominately low rise, family housing;
 - consideration of the two adjacent conservation areas at Warwick Gardens and Little High Street;
 - the requirement for a mix of homes that take account of the character of the area and the existing built environment and to properly address local housing need.

4. The requirement of 1 parking space per unit given the huge demand for parking in the area. Alternatively, the policy must emphasise the need for the proposals to provide onsite measures to encourage sustainable transport and provide offsite contributions

5. The photograph in the draft Local Plan needs to be replaced with an up to date picture. The gas holder was removed many years ago.

(continue on a separate sheet/expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes

Yes

NO

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

I believe the developer/promoter of the site will seek an even higher density than the proposed indicative amount in the draft plan of 150 units. They will argue that the ‘abnormal’ cost of decontamination will require higher densities to make the development viable. They will also argue

that the height of the gas holder justifies nine storeys. Many people have moved into the area since the holder was removed many years ago. I do not think the density levels should be increased.

Given the location of the site, on the edge of the town centre with predominately family housing surrounding it, already constrained roads and parking, close to the hospital, I believe the site should provide a mix of homes, Furthermore, proper consideration should be given to the provision of onsite parking and/or the provision of onsite measures to encourage sustainable transport.

Please note: The inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

Office use Only	
Comment number	SDWLP-23
Date received	15.02.21

Submission Draft Worthing Local Plan January 2021

Regulation 19 (Publication Stage) Comments Form

This consultation runs from Tues 26th Jan to Tues 23rd March 2021

How to submit your comments

This response form has two parts:

- Part A: Personal Details
- Part B: Your representation(s)

Both Part A and Part B of the form need to be completed in order for your representation(s) to be valid. Please fill in a separate sheet for each representation (Part B) you wish to make. You do not need to fill out Part A for each representation provided that all representations made are securely attached.

Forms must be returned by the latest
5pm Tuesday 23rd March 2021

You can complete this form on-line: www.adur-worthing.gov.uk/worthing-local-plan

Or return a hard copy of the form:

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

Or by e-mail to: planning.policy@adur-worthing.gov.uk

Further guidance

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If you require any advice on completing this form please feel free to contact the Planning Policy Team via email (as above) or telephone on 01273 263000.

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

Part A - Contact Details			
First name	Pauline		
Last name	Fraser		
Organisation	N / A		
Address line	[REDACTED]		
Address line	[REDACTED]		
Town	[REDACTED]		
Postcode	[REDACTED]	Telephone	[REDACTED]
Email	[REDACTED]		

Signed	[REDACTED]	Date	15/02/2021
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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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<u>Use of information</u>
<p>All data will be stored securely in line with the GDPR. 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. We cannot accept or report confidential or anonymous responses. Further information about how personal information is processed can be found in the Planning Policy Privacy Notice:</p> <p>https://www.adur-worthing.gov.uk/planning-policy/privacy-notice/</p>

Part B
Please use a separate sheet for each representation

To which part of the Submission Draft Local Plan does this representation relate?

Policy	A9	Paragraph	4.29/30	Map Extract	N/R
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Do you consider the Submission Draft Local Plan:

Legally compliant?	Yes	X	No	
	Don't know			
Sound?	Yes		No	X
	Don't know			
Complies with the Duty to Cooperate?	Yes		No	
	Don't know	X		

Please give details of why you consider the Submission Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Submission Draft Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Although I am in principle in favour of the re-development of brownfield sites to provide a much-needed mix of affordable one, two and three-bed housing for local residents, there are major obstacles regarding the development of A9, the former Gasworks site in Lyndhurst Road. Before any development can take place, the site must be decontaminated in such a way that toxic material is not released into the atmosphere or on to ground surfaces, thus compromising the health and safety of residents in this densely populated area.

Any increase in residential occupancy is going to impact adversely on the local road system. The site is bounded to the east by Park Road, a narrow one-way residential road with on-street parking, and to the north by Lyndhurst Road, which provides the main access to Worthing A&E Hospital. Lyndhurst Road is particularly narrow at the border with A9, has dense residential housing opposite, and is currently prone to congestion during rush-hours. I have yet to see where the developers envisage exit from and ingress to the site to and from the existing road network. The plan therefore fails on SO4: to 'ensure that there is sufficient infrastructure capacity to meet existing needs and the needs arising from the development' and is therefore unsound.

I note that the latest proposal is for 0.6 parking spaces per property. This drastic limitation will lead to further pressure on parking permits for the CPZ and residents with a permit may find themselves unable to park anywhere in the zone, thus failing on SO6: integrating 'into existing communities' and is, therefore, unsound.

I further note that the developer proposes to increase the number of properties from 85 to 150 or even to 210, no doubt in order to make a profit on the development, because the decontamination of the site will be both costly and protracted. The proposed plan is unsound in terms of DM2 (density)

Furthermore, in order to accommodate the proposed increased density, a high-rise building of nine storeys is envisaged and instead of two- and three-bed properties, it will largely consist of one-bed flats, thus failing to meet SO1: 'new homes that best reflect the identified needs...'

Policy DM1 requires schemes to 'deliver sustainable, mixed and balanced communities'. The current allocation at the densities proposed will be unable to meet other policy requirements and is therefore undeliverable.

To deliver Policy DM2 (density) the capacity of site A9 must be based on a design-led approach which considers the site context and character, in this case including nearby Conservation Areas and Beach House Park to the east. A high-rise block of flats is entirely inappropriate for this area and will stick out like a sore thumb. In addition, I understand that the higher you build, the deeper you must dig the foundations, and therefore the developer may find more contamination to remove. High-rise is not the way to go: it cuts out light, casts shadows and is inimical to biodiversity. This plan fails to deliver on DM2 and is therefore unsound.

(continue on a separate sheet/expand box if necessary)

Please set out what modification(s) you consider necessary to make the Submission Draft Local Plan legally compliant or sound, having regard to the matter you have identified above where this relates to soundness. You will need to say why this modification will make the Submission Draft Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes

NO

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: The inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

15/02/2021

Patron Her Majesty The Queen

The British Horse Society

Email enquiry@bhs.org.uk

Abbey Park,

Website www.bhs.org.uk

Stareton,

Tel 02476 840500

Kenilworth,

Fax 02476 840501

Bringing Horses and People Together

Warwickshire CV8 2XZ

The
British
Horse
Society

Via Email

planning.policy@adur-worthing.gov.uk

19th February 2021

Dear Sir or Madam,

RE: Adur & Worthing Draft Local Plan

The following response is on behalf of The British Horse Society, the UK's largest equestrian Charity, representing the UK's 3 million horse riders.

To provide both a national and a local response to this plan, the section in italics has been provided by our BHS Access Officer covering Adur.

It should be borne in mind that many equestrians living in the urban area of Adur and Worthing have been driven out of the area because of intensive developments and now have to travel into the SDNP to places such as Steyning, Storrington, Washington, Findon, Small Dole and Fulking to domicile their animals. This migration has mostly resulted in an additional two car journeys each and every day of the year, a contribution to global warming that is not recognised in planning consideration or calculated as cost of development: 15 horses moving away to stabling outside the area = 30 x 365 additional journeys via Washington or Steyning per year. Please calculate the emissions and mileage created if you wish. This has created an interesting recreational family activity where Dad and the children start off from home to meet Mum on her horse on the Downs. She will have ridden south, joined them for a while and then return to the stables using a different route if or where one exists, with children and dad returning home.

The A27 is an barrier along most of its length, being uncrossable by equestrians and devoid of any potential rights of way to create a connection for a circular route transition for north – south transit. In the very few points where crossings can be made (such as close to Shoreham Airport), these are threatened by closure or design amendments associated with mega building schemes that would automatically act as deliberate exclusion as far as equestrians are concerned.

Covid has been an eye opener as far as the wellbeing of human mental capacity is concerned and shown that the provision of outdoor sports and pastimes can be a huge benefit to maintain healthy minds. To be of any benefit in this respect, public rights of way MUST enable outings that do not include the need to circumvent major or busy traffic routes. Planning and development must enable connectivity of new and existing off road access (for all Non Motorised Users) to give this safe access as well as enhancing the opportunity to enjoy open air in an expanding offering. People will not queue up to cross the A27 for recreation on foot or horseback; what will happen is that they will get in a car or horsebox and drive to a car park north of the A27, and then seek to enjoy the open space of the Downs. Where are the car parks for this?"

Nationally equestrians have just 22% of the rights of way network which is increasingly disjointed by roads which were once safe rural routes that have become busy thoroughfares. It is because of this that any planning and infrastructure benefitting or likely to impact on non-motorised users must take into account those other than walkers and cyclists.

Since 2010, the British Horse Society has had over 4,774 road incidents involving horses reported to it, 1080 horses have been injured, 395 horses have died, 44 humans have lost their lives and 1220 have been injured; providing safe off road provision will help to prevent these numbers from increasing in the future.

The British Horse Society is an Appointed Representative of South Essex Insurance Brokers Limited who are authorised and regulated by the Financial Conduct Authority.

Registered Charity Nos. 210504 and SC038516. A company limited by guarantee. Registered in England & Wales No. 444742

The 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 including National Trails.”

DEFRA Rights of Way circular 1/09 1.5 states,

“In many areas, rights of way help to boost tourism and contribute to rural economies. They can also provide a convenient means of travelling, particularly for short journeys, in both rural and urban areas. They are important in the daily lives of many people who use them for fresh air and exercise on bicycle, on foot, on horseback or in a horse-drawn vehicle, to walk the dog, to improve their fitness, or to visit local shops and other facilities. Local Authorities should regard PROWs as an integral part of the complex of recreational and transport facilities within their area”.

ACTIVE TRAVEL

Whilst the BHS supports the national initiative to encourage more cycling and walking as part of Active Travel Plans it is important that, in forming its local plan, the council recognises that Active Travel ALSO includes equestrians.

The government's Cycling and Walking Investment Strategy Safety Review says:

“1.2 But safety has particular importance for vulnerable road users, such as walkers, cyclists and horse riders. All road users have an equal right to use the road, and safety and the perception of safety are key factors in determining how far people use these modes of transport. The safer they feel, the more they will use these active modes of travel. The more people who use Active Travel, the fitter and healthier they will be, and the more their communities will benefit from lower congestion and better air quality, among a host of other benefits”(Jesse Norman, Minister for Transport p 4)

Jesse Norman in House of Commons debate on Road Safety, 5 November 2018:

“We should be clear that the cycling and walking strategy may have that name but is absolutely targeted at vulnerable road users, including horse-riders”

And final point by Jesse Norman in debate:

“Horse riders are vulnerable road users—there is no doubt about that, and there never has been—and they have been included in the work we are doing.”

THE HEALTH BENEFITS OF HORSE RIDING IN THE UK

(Data comes from research undertaken by the University of Brighton and Plumpton College on behalf of The British Horse Society)

- 68% of questionnaire respondents participate in horse riding and associated activities for 30 minutes or more at least three times a week. Sport England estimate that such a level of sporting activity will help an **individual achieve or exceed the government’s recommended minimum level of physical activity**.
- Women have been identified in government studies as a social group with relatively low levels of participation in physical activity. Some 93% of questionnaire respondents were women and 49% percent of female respondents were aged 45 or above. These are comparable figures to a major Sport England survey which found that 90 percent of those participating in equestrianism are women and 37 percent of the female participants in equestrianism are aged 45 or above. **The gender and age profile of equestrianism is not matched by any other sport in the UK¹.**

¹ Sport England (2010) Active People Survey (2010/11)

- Amongst the horse riders who took part in the survey, 39% had taken no other form of physical activity in the last four weeks. **This highlights the importance of riding to these people, who might otherwise be sedentary.**
- Horse riders with a **long-standing illness or disability** who took part in the survey are able to undertake horse riding and associated activities at the same self-reported level of frequency and physical intensity as those without such an illness or disability

For further information, please see:

https://www.bhs.org.uk/~/_media/documents/marketing/health-benefits-of-riding-in-the-uk-full-report.ashx?la=en

https://www.bhs.org.uk/~/_media/documents/access/access-leaflets/statisticsarow-1119.ashx?la=en

BENEFITS TO THE ECONOMY OF HORSE RIDING/CARRIAGE DRIVING

The British Equestrian Trade Association (BETA) represents more than 800 member companies. The most recent BETA National Equestrian Survey (2019)² indicated:

- £4,174 per horse to the economy
- £4.7 billion economic value of the equestrian sector (*excluding* the horse racing industry)

GENERAL STATISTICS

The most recent BETA National Equestrian Survey (2019) indicated:

- 847,000 horses in Britain
- 1.8 million regular riders of 3 million total
- Lack of access to horses and riding facilities is a barrier for 22% of lapsed riders returning

NEWLY CONSTRUCTED PATHS

The physical creation of new paths within the local plan to both achieve LCWIP objectives and improve the lives of local residents would be welcomed as this will enhance the ability of the public to increase its access to safe off road routes for leisure and commuting. The Society is happy to work with the Council to ensure that new paths are integrated with public access areas and existing public rights of way network to achieve maximum benefit for ALL users.

USE OF EXISTING PUBLIC RIGHTS OF WAY

We recognise that many opportunities for new rights of way routes arising from development within the local plan will be in urban areas. However, some will be in semi-rural areas close to urban areas and beyond in order to encourage cycling to replace short commuting car journeys. These routes are likely to be of equal benefit to equestrians and so bridleways, or even restricted byways, rather than cycleways should be the status of choice. We know that existing public rights of way and minor roads will be attractive to use as cycling routes as they already have public access. Our concern is that cycling routes should not, in any way, compromise the use of the public rights of way by making them less amenable to existing lawful users of the right of way. Where existing routes are considered as part of any plan, it is important that all user groups are consulted so that the impact on other lawful users can be assessed and, if necessary, alternative measures discussed.

- For each specific proposal which uses a public right of way or minor road, the width, the proposed surface and the impact of increased estimated numbers of cyclists must be considered in order to design a route suitable for all legal users in each specific location.

² <http://www.beta-uk.org/pages/news-amp-events/news/national-equestrian-survey-2019-provides-optimistic-view-of-industry.php>

- Any newly constructed paths should be integrated/physically linked with the existing public rights of way network where possible and needed, clearly waymarked and recorded on either the definitive map or another publicly accessible map as appropriate.
- Where proposed new or improved routes have crossing points or junctions with the main highway network, appropriate signal-controlled (or even grade-separated) crossings should be provided.
- Consideration should be given to the use of 'Quiet Lanes'³ where the speed of traffic is reduced.

OTHER CONSIDERATIONS TO NOTE

Commuting cycling is likely to take place at times other than when recreational use takes place. Thus a path used for commuting may well be used for recreational travel especially if it provides a circular route by connecting to other paths.

Several categories of public rights of way (bridleways, restricted byways and byways and minor public roads) are already shared by cyclists and other user groups. Thus, as a general principle, we believe that, for maximum public benefit & fairness, the reciprocal should be implemented, i.e. that new routes provided with a view to improving greener travel should be shared with other user groups unless there is a specific, unresolvable reason not to do so. Creating these as bridleways or restricted byways makes this status unambiguous.

Use of Traffic Regulation Orders to prohibit use of a public right of way by a specific user group for the benefit of cycling needs to be fully justified and take into account the rights of other lawful users. It should be noted that the Defra Statutory Guidance to local authorities on Rights of Way Improvement Plans, 2002, states in para. 2.2.21:

'There is potential for conflict on ways carrying higher rights between different classes and types of users. Wherever possible proposals for improving rights of way should not unduly benefit one class of user at the expense of another. Improvements that are intended to benefit cyclists, harness-horse drivers, horse riders or walkers should not unduly restrict lawful MPV use of public vehicular rights of way'.

CONCLUSION

The inclusion of equestrians within the Council's Local Plan provision for non motorised users would:

- Add to the health and wellbeing of a sector of the county's population who would otherwise be excluded;
- Benefit the local economy with the income that the sport attracts to local areas;
- Ensure that equality of opportunity is provided for a sport dominated by women and, furthermore, in which, less able-bodied people may participate at an equal level of intensity.
- Need cost no more than the plans which would otherwise exclude them (in many cases, simply a different sign to indicate use by all user groups)

We would welcome the opportunity to work with the Council to create a plan which is fully inclusive of all non-motorised users.

Yours faithfully

Sarah Rayfield (Mrs.)
Access Field Officer: London & South East
Email: sarah.rayfield@bhs.org.uk
Tel: 02476 840713
Mob: 07971 059262

³ https://www.cpre.org.uk/wp-content/uploads/2019/11/quiet_lanes_1.pdf

Office use Only	
Comment number	SDWLP-25
Date received	20.02.21

Submission Draft Worthing Local Plan January 2021

Regulation 19 (Publication Stage) Comments Form

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Part A - Contact Details			
First name	Annemarie		
Last name	Van der Merwe		
Organisation	N/A		
Address line	[REDACTED]		
Address line			
Town	[REDACTED]		
Postcode	[REDACTED]	Telephone	
Email	[REDACTED]		

Signed	[REDACTED]	Date	20 Feb 2021
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Note: Unless you request otherwise <i>(by putting a cross in the box to the right)</i> , 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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Part B

Please use a separate sheet for each representation

To which part of the Submission Draft Local Plan does this representation relate?

Policy

A9

Paragraph

4.29/4.30

Map
Extract

N/R

Do you consider the Submission Draft Local Plan:

Legally compliant?

Yes

X

No

Don't know

Sound?

Yes

No

Don't know

Complies with the Duty to Cooperate?

Yes

X

No

Don't know

Please give details of why you consider the Submission Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Submission Draft Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Although I support the principle of development on this site for much needed family housing and in particular the policy requirement to 'address contamination issues' and to provide 'high quality residential', the Policy is not sound. This is because I do not believe the indicative capacity has taken into account the constraints of the site. I believe that a development at the density proposed cannot be achieved whilst still meeting the other policy requirements set out in the Plan including DM1 and DM2 and therefore the current allocation is undeliverable.

Reasons for objection

1. The site cannot deliver the capacity of homes identified. The Regulation 18 version of this Plan indicated a capacity of 85 town houses and flats. In order to achieve the new indicative

number of 150 units it is highly likely that any future redevelopment scheme would only comprise a flatted development. Indeed, it is interesting to note that the developer is currently consulting on a proposal for 210 one-bedroom flats over 9 storeys with 0.6 parking spaces per flat on this site. They propose to submit the planning application in March 2021. The pre-application proposals are helpful in that they clearly illustrate that in order to achieve high densities only one bed units are likely to be delivered. It has therefore not been clearly demonstrated that this site can accommodate the anticipated number of units and still be in accordance with your housing mix policy DM1 and your SHMA which identifies that the most significant need in Worthing is for 2/3 bed housing. Although Para 5.8 of the Plan indicates that whilst higher density flatted schemes are more likely to deliver smaller properties, it still stresses that they “should also include a proportion of larger units with 3 or more bedrooms”. Policy DM1 requires schemes to ‘deliver sustainable, mixed and balanced communities’. The current allocation at the densities proposed will not be able to meet other policy requirements and is therefore undeliverable.

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Yes

Yes

NO

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Signature:

[Redacted Signature]

Date:

20 February
2021

Office use Only	
Comment number	SDWLP-26
Date received	20.02.21

Submission Draft Worthing Local Plan January 2021

Regulation 19 (Publication Stage) Comments Form

This consultation runs from Tues 26th Jan to Tues 23rd March 2021

How to submit your comments

This response form has two parts:

- Part A: Personal Details
- Part B: Your representation(s)

Both Part A and Part B of the form need to be completed in order for your representation(s) to be valid. Please fill in a separate sheet for each representation (Part B) you wish to make. You do not need to fill out Part A for each representation provided that all representations made are securely attached.

Forms must be returned by the latest 5pm Tuesday 23rd March 2021

You can complete this form on-line: www.adur-worthing.gov.uk/worthing-local-plan

Or return a hard copy of the form:

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

Or by e-mail to: planning.policy@adur-worthing.gov.uk

Further guidance

The Local Plan, the evidence base and all supporting documents are published on the Council's website (see link above). This includes a Guidance Note on how to make effective representations and you are advised to read this before making any comments. At this stage (Regulation 19) comments should only relate to whether you consider the Plan complies with legal requirements, including the duty to cooperate, and whether the document is sound.

If you require any advice on completing this form please feel free to contact the Planning Policy Team via email (as above) or telephone on 01273 263000. You can respond to this consultation online by using the e-form or by email. However, if your preference is to make comments manually this form can be photocopied as many times as necessary.

Part A - Contact Details			
First name	Annemarie		
Last name	Van der Merwe		
Organisation	N/A		
Address line	[REDACTED]		
Address line			
Town	[REDACTED]		
Postcode	[REDACTED]	Telephone	
Email	[REDACTED]		

Signed	[REDACTED]	Date	20 Feb 2021
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Note: Unless you request otherwise <i>(by putting a cross in the box to the right)</i> , 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

All data will be stored securely in line with the GDPR. 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. We cannot accept or report confidential or anonymous responses. Further information about how personal information is processed can be found in the Planning Policy Privacy Notice:

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

Part B

Please use a separate sheet for each representation

To which part of the Submission Draft Local Plan does this representation relate?

Policy

A9

Paragraph

4.29/4.30

Map
Extract

N/R

Do you consider the Submission Draft Local Plan:

Legally compliant?

Yes

X

No

Don't know

Sound?

Yes

No

Don't know

Complies with the Duty to Cooperate?

Yes

X

No

Don't know

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Yes

Yes

NO

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Signature:

[Redacted Signature]

Date:

20 February
2021

Local Plan Submission Draft – Consultation response by Ferring Conservation Group

Worthing's Local Plan is primarily a matter for Worthing residents and their representatives but we in Ferring have a strong interest too, particularly in the allocation of land on our eastern borders - Chatsmore Farm and the Goring-Ferring Gap - which are continuous with our own open green spaces of the same names. The following comments are submitted on behalf of Ferring Conservation Group, which has over 900 members, some of whom live in Goring.

We find the plan as a whole to be sound. The Council has worked hard, over a long period, with its excellent professional planning staff, commissioning research from consultants and consulting with its residents and neighbours, to produce a plan which meets, as far as it can, the housing needs of the borough while protecting, as far as it can, its few remaining green fields and stretches of open coastline.

Section 2 of the plan strikes the right balance between economic, social and environmental needs. We commend the commitment to a sustainable environment in para 2.6

We strongly support the assertion in para 3.27 that there is no way in which the Council could deliver much more than a quarter of the sites that would be required to meet its 'objectively assessed housing need'. There is simply not the capacity within the Planning Authority area to provide such huge numbers.

The preservation of Local Gaps and Local Green Space referred to in para 3.41 is vitally important to the balance struck between housing and environmental protection. Nearly all the development is to take place within the present built-up area. The Council has allocated some 'edge of town' areas for development but maintains the eastern and western flanks as essential breaks in the otherwise continuous built-up area from Lancing to East Preston and green spaces for informal recreation.

Two of the Local Green Gaps referred to in paras 3.51 -3.53 are shared with Ferring. Chatsmore Farm is largely within Goring but the western portion is within Ferring. On its own the Ferring portion could not provide the break in between the settlements, nor could it provide the proper setting for Highdown – an important Ancient Monument and significant landscape feature. The Goring-Ferring Gap is more evenly divided between the two LPAs but, again, the Ferring portion would not be enough to provide a significant gap between settlements and the magnificent view from the beach, across the farmland and up to Highdown would be ruined – for ever. Policy SS5 strongly supports this analysis.

But these Gaps are not simply a no-mans-land: as paras 3.54 – 3.56 point out, they have intrinsic value as green spaces, farmed but accessible through public and informal footpaths and are much valued by local residents and visitors for their peaceful tranquility and wildlife. The Goring-Ferring Gap has recently been designated a Local Wildlife Site and its sensitivity as a landscape, and recreational feature is well set out in para 3.57. Chatsmore Farm has particular 'green' value because of the Ferring Rife that runs through the site from east to west. Policy SS6 strongly supports this analysis.

Ed Miller (Secretary, Ferring Conservation Group)

23 February 2021

Just add a sheet with your name and address/email. Anonymous submissions will not count.

To which part of the Submission Draft Local Plan does this representation relate?

Policy

A9

Paragraph

4.29/4.30

Map
Extract

N/R

Do you consider the Submission Draft Local Plan:

Legally compliant?

Yes

X

No

Don't know

Sound?

Yes

No

Don't know

Complies with the Duty to Cooperate?

Yes

X

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[Redacted Signature]

Date:

25-2-21

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Paragraph

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Cooperate?

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Signature:



Date:

24/02/21

Running Policy"

Ref: SDWLP-30

WORTHING TOWN HALL,
WORTHING,
BN11 1HA

28 FEB. 2021

WORTHING LOCAL PLAN

Dear Sirs,

My wife and I give our support to the
Draft Worthing Local Plan.

Yours faithfully

(M.F. WISHMAN)

If you require any advice on completing this form please feel free to contact the Planning Policy Team via email (as above) or telephone on 01273 263000.

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

Part A - Contact Details			
First name	NIKKI		
Last name	TOMS		
Organisation	N/A		
Address line	[REDACTED]		
Address line	[REDACTED]		
Town	[REDACTED]		
Postcode	[REDACTED]	Telephone	[REDACTED]
Email	[REDACTED]		

Signed	[REDACTED]	Date	1st MARCH 21
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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

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Part B**Please use a separate sheet for each representation**

To which part of the Submission Draft Local Plan does this representation relate?

Policy

A9

Paragraph

4.29/4.30

Map
Extract

N/R

Do you consider the Submission Draft Local Plan:

Legally compliant?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
	Don't know	<input type="checkbox"/>		<input type="checkbox"/>
Sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
	Don't know	<input type="checkbox"/>		<input type="checkbox"/>
Complies with the Duty to Cooperate?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
	Don't know	<input type="checkbox"/>		<input type="checkbox"/>

Please give details of why you consider the Submission Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Submission Draft Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Although I support the principle of development on this site for much needed family housing and in particular the policy requirement to 'address contamination issues' and to provide 'high quality residential', the Policy is not sound. This is because I do not believe the indicative capacity has taken into account the constraints of the site. I believe that a development at the density proposed cannot be achieved whilst still meeting the other policy requirements set out in the Plan including DM1 and DM2 and therefore the current allocation is undeliverable.

Reasons for objection

1. The site cannot deliver the capacity of homes identified. The Regulation 18 version of this Plan indicated a capacity of 85 town houses and flats. In order to achieve the new indicative number of 150 units it is highly likely that any future redevelopment scheme would only comprise a flatted development. Indeed, it is interesting to note that the developer is currently consulting on a proposal for 210 one-bedroom flats over 9 storeys with 0.6 parking spaces per flat on this site. They propose to submit the planning application in March 2021. The pre-application proposals are helpful in that they clearly illustrate that in order to achieve high densities only one bed units are likely to be delivered. It has therefore not been clearly demonstrated that this site can accommodate the anticipated number of units and still be in accordance with your housing mix policy DM1 and your SHMA which identifies that the most significant need in Worthing is for 2/3 bed housing. Although Para 5.8 of the Plan indicates that whilst higher density flatted schemes are more likely to deliver smaller properties, it still stresses that they "should also include a proportion of larger units

with 3 or more bedrooms". Policy DM1 requires schemes to 'deliver sustainable, mixed and balanced communities'. The current allocation at the densities proposed will not be able to meet other policy requirements and is therefore undeliverable.

2. I acknowledge that development proposals must make the most efficient use of land and I support Policy DM2 - Density. I support the fact that Policy DM2 makes clear that the capacity of any site must be based on a design led approach which consider the site context and character. The site constraints of A9 need to be recognised, particularly in respect of the need to be cognisant of the character of the nearby Conservation Areas and Beach House Park to the east. The proposed allocation does not fully recognise the nature of the road network around the site. Park Road is one way and very narrow, Lyndhurst Road is heavily constraint and highly residential in this location. It is a very busy road and is the main road to the A&E hospital. In view of these constraints I do not believe that the Proposed Allocation for A9 can deliver the indicative capacity without having a dramatic negative impact on the character of the area. It is therefore undeliverable.
3. The capacity of the site will also be dependent on the amount of parking proposed. The pre-application scheme clearly illustrates that the site could not deliver the number of units and the necessary levels of parking. The CPZ is currently oversubscribed and this will be exacerbated by the loss of hospital parking from this site. There needs to be an increased emphasis on the need for the proposals to provide either onsite parking to meet the need generated by the development or onsite measures to encourage sustainable transport and offsite contributions.

Please set out what modification(s) you consider necessary to make the Submission Draft Local Plan legally compliant or sound, having regard to the matter you have identified above where this relates to soundness. You will need to say why this modification will make the Submission Draft Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

1. The indicative number of units on the site needs to be reduced. This proposed modification is justified on the grounds that the higher indicative capacities are undeliverable.
2. Paras 4.29 and 4.30, which set out the site description need to be clear about heritage and local character constraints. This proposed modification is justified on the grounds that it would bring the proposed Allocation A9 in line with the requirements of Policy DM2.
3. There is an inconsistency in how development requirements are expressed for this site allocations. I note that Site A10 requires the development proposals to "not have an unacceptable impact on the amenity of neighbouring residents" and Site A11 requires any redevelopment to "be sensitive to the surrounding Conservation Areas etc". Similar requirements should be included in the list of development requirements for Site A9 and should include the following:
 - protection the character of the existing area, which is predominately low rise, family housing;
 - consideration of the two adjacent conservation areas at Warwick Gardens and Little High Street;
 - the requirement for a mix of homes that take account of the character of the area and the existing built environment and to properly address local housing need.

4. The requirement of 1 parking space per unit given the huge demand for parking in the area. Alternatively, the policy must emphasise the need for the proposals to provide onsite measures to encourage sustainable transport and provide offsite contributions
5. The photograph in the draft Local Plan needs to be replaced with an up to date picture. The gas holder was removed many years ago.

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If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes

Yes

NO

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

I believe the developer/promoter of the site will seek an even higher density than the proposed indicative amount in the draft plan of 150 units. They will argue that the 'abnormal' cost of decontamination will require higher densities to make the development viable. They will also argue that the height of the gas holder justifies nine storeys. Such a justification would not be appropriate. The Gasometer was an industrial structure and varied between ground level & the extended height. Many people have moved into the area since the holder was removed many years ago. I do not think the density levels should be increased beyond a level that the local services and environment could support or sustain. Given the location of the site, on the edge of the town centre with predominately family housing surrounding it, already constrained roads and parking, close to the hospital, I believe the site should provide a mix of homes. I propose therefore, that the development at Kings Mews in Park Road, serves as an example of the type of housing suited to the gasworks site. Furthermore, proper consideration should be given to the provision of onsite parking and/or the provision of onsite measures to encourage sustainable transport.

Please note: The inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

[Redacted Signature]

Date:

15 MARCH 21

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

Part A - Contact Details	
First name	ANDREW
Last name	TOMS
Organisation	N/A
Address line	
Address line	
Town	
Postcode	
Telephone	
Email	

Signed		Date	1/3/2021
--------	--	------	----------

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No:
please
don't
add me

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Part B**Please use a separate sheet for each representation**

To which part of the Submission Draft Local Plan does this representation relate?

Policy

A9

Paragraph

4.29/4.30

Map
Extract

N/R

Do you consider the Submission Draft Local Plan:

Legally compliant?

Yes

X

No

Don't know

Sound?

Yes

No

Don't know

**Complies with the Duty to
Cooperate?**

Yes

X

No

Don't know

Please give details of why you consider the Submission Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Submission Draft Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

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4. The requirement of 1 parking space per unit given the huge demand for parking in the area. Alternatively, the policy must emphasise the need for the proposals to provide onsite measures to encourage sustainable transport and provide offsite contributions
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If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes

Yes

NO

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Please note: The inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

[Redacted Signature]

Date:

1/3/2021

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

08 March 2021

Our Ref: 784-A098052-2

Dear Sirs,

Submission Draft Worthing Local Plan January 2021 – response to consultation on behalf of Mr C Somerset

Please enclosed our representations on behalf of the landowner of Site A13, Mr C Somerset in relation to the consultation on the Submission Draft Worthing Local Plan.

The representations support the proposed allocation of the site and provide our comments in relation to each of the site criteria that are proposed in draft. We also comment on two further policies, SS2 and DM2.

I trust our representations are clear but if you need to discuss anything, please do not hesitate to get in touch.

Yours sincerely

A solid black rectangular box used to redact the signature of Nigel Abbott.

Nigel Abbott
Planning Director
Tetra Tech Environment Planning Transport Limited.

Enc

Cc C Somerset Esq

PLEASE INSERT TELEPHONE NUMBER AND EMAIL ADDRESS IN FOOTER AND DELETE THIS LINE

Office use Only	
Comment number	SDWLP-33
Date received	

Submission Draft Worthing Local Plan January 2021

Regulation 19 (Publication Stage) Comments Form

This consultation runs from Tues 26th Jan to Tues 23rd March 2021

How to submit your comments

This response form has two parts:

- Part A: Personal Details
- Part B: Your representation(s)

Both Part A and Part B of the form need to be completed in order for your representation(s) to be valid. Please fill in a separate sheet for each representation (Part B) you wish to make. You do not need to fill out Part A for each representation provided that all representations made are securely attached.

Forms must be returned by the latest 5pm Tuesday 23rd March 2021

You can complete this form on-line: www.adur-worthing.gov.uk/worthing-local-plan

Or return a hard copy of the form:

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

Or by e-mail to: planning.policy@adur-worthing.gov.uk

Further guidance

The Local Plan, the evidence base and all supporting documents are published on the Council's website (see link above). This includes a Guidance Note on how to make effective representations and you are advised to read this before making any comments. At this stage (Regulation 19) comments should only relate to whether you consider the Plan complies with legal requirements, including the duty to cooperate, and whether the document is sound.

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

Part A - Contact Details			
First name	Nigel		
Last name	Abbott		
Organisation	Tetra Tech Limited on behalf of Mr C Somerset		
Address line	11 th Floor		
Address line	1 Angel Court		
Town	London		
Postcode	EC2R 7HJ	Telephone	020 7250 7511
Email	nigel.abbott@tetrattech.com		

Signed		Date	08.03.2021
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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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<u>Use of information</u>
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Part B

Please use a separate sheet for each representation

To which part of the Submission Draft Local Plan does this representation relate?

Policy

SS2

Paragraph

Map
Extract

Do you consider the Submission Draft Local Plan:

Legally compliant?

Yes

X

No

Don't know

Sound?

Yes

X

No

Don't know

**Complies with the Duty to
Cooperate?**

Yes

X

No

Don't know

Please give details of why you consider the Submission Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Submission Draft Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

On behalf of the landowner we wish to support the proposed allocation of Site Allocation A13 for residential development listed in Policy SS2. Full representations are set out, including comments on the various site requirements in our separate supporting response to the allocation itself.

(continue on a separate sheet/expand box if necessary)

Please set out what modification(s) you consider necessary to make the Submission Draft Local Plan legally compliant or sound, having regard to the matter you have identified above where this relates to soundness. You will need to say why this modification will make the Submission Draft Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes

☐

NO

X

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: The inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

A rectangular box containing a solid black rectangle, indicating that the signature has been redacted.

Date:

08.03.21

Office use Only	
Comment number	SDWLP-33
Date received	

Submission Draft Worthing Local Plan January 2021

Regulation 19 (Publication Stage) Comments Form

This consultation runs from Tues 26th Jan to Tues 23rd March 2021

How to submit your comments

This response form has two parts:

- Part A: Personal Details
- Part B: Your representation(s)

Both Part A and Part B of the form need to be completed in order for your representation(s) to be valid. Please fill in a separate sheet for each representation (Part B) you wish to make. You do not need to fill out Part A for each representation provided that all representations made are securely attached.

Forms must be returned by the latest 5pm Tuesday 23rd March 2021

You can complete this form on-line: www.adur-worthing.gov.uk/worthing-local-plan

Or return a hard copy of the form:

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Part A - Contact Details			
First name	Nigel		
Last name	Abbott		
Organisation	Tetra Tech Limited on behalf of Mr C Somerset		
Address line	11 th Floor		
Address line	1 Angel Court		
Town	London		
Postcode	EC2R 7HJ	Telephone	020 7250 7511
Email	nigel.abbott@tetrattech.com		

Signed		Date	08.03.2021
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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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Part B

Please use a separate sheet for each representation

To which part of the Submission Draft Local Plan does this representation relate?

Policy	Site A13	Paragraph	4.37 & 4.38	Map Extract	
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Do you consider the Submission Draft Local Plan:

Legally compliant?	Yes	X	No	
	Don't know			
Sound?	Yes	X	No	
	Don't know			
Complies with the Duty to Cooperate?	Yes	X	No	
	Don't know			

Please give details of why you consider the Submission Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Submission Draft Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

On behalf of the landowner we wish to support the proposed allocation of Site Allocation A13 for residential development. The allocation has been confirmed following the provision of background information and evidence, including an illustrative masterplan that showed a layout comprising 73 dwellings and which complied with the various spatial site restrictions to demonstrate that an acceptable form of development can be designed for the site notwithstanding the constraints posed by the site’s proximity to Ancient Woodland, the boundary of the South Downs National Park, ecological and flood risk issues etc.

As a general comment we note that the allocation provides an indicative capacity of 60 residential units compared to the submitted indicative masterplan showing 73 units which is a low number having regard to paragraph 5.34 of the draft Local Plan which states: “As a general guide the Council would expect densities in the borough to be a minimum of 35 dwellings per hectare when applied to edge of town allocations (such as this site) and developments of family housing”. We therefore consider that the figure of 60 units should be stated as the minimum number of dwellings

that the site should be expected to deliver and where possible, if it is demonstrated through a planning application that a greater number of units could be developed in an acceptable manner, this should be considered appropriate. In light of this, we have made a suitable comment in relation to Policy DM2 dealing specifically with density.

We also note that the expected delivery timeframe is 6 years+ but would comment that it is likely that the landowner will seek a delivery partner sooner to enable planning permission to be sought and development to commence within a quicker timeframe so we suggested the Expected Delivery is changed to 0-5 years.

We note the various criteria that development is expected to address and provide our comments in relation to each below:

Note: The draft allocation contains two criteria b's and should therefore be amended to correct this minor error.

- a) provide safe and suitable access onto Titnore Lane. Internal access between the southern and northern parcels of the site should be located in the existing gap currently formed by the overhead pylon alignment;

Comment: Detailed work has been undertaken by our transport team to establish that a safe access can be provided to the site from the frontage of the southern of the two fields to Titnore Lane combined with the provision of a footway along the eastern side of Titnore Lane southwards to the junction with Titnore Way. The previously submitted illustrative masterplan indicated that an access between the two parcels of land utilising the existing gap in the woodland shaw can be provided to link the two parcels of land. We consider that part (a) of the site allocation requirements can be complied with.

- b) deliver links to the existing footpath network to improve access to the wider area and the SDNP, specifically routes to the east and south through neighbouring urban areas. These new connections would enable access through the local PRow network to the National Park to the north of the A27 and south west of the site (including Highdown Hill);

Comment: The previously prepared illustrative masterplan suggests locating a semi-natural area of woodland in the north eastern corner of the site that sits between the proposed developed part of the site and the untouched woodland separating the site allocation from Garden Wood to the east. A footway link could be provided through this space to provide the required linkage to the east towards the West Durrington Southern Sector land. For access to the south, we have demonstrated it is possible to provide a footway alongside the eastern side of Titnore Lane southwards to its junction with Titnore Way. South of the junction with Titnore Way, there is already a separated footway running parallel between Titnore Lane and Pennycress Avenue which could be followed to then allow footpath 2139 to be taken leading westwards from Titnore Lane towards Highdown Hill. We consider that part (b) of the site allocation requirements can be complied with.

- b) demonstrate there will be no loss or deterioration of Ancient Woodland following the Natural England and Forestry Commission standing advice for ancient woodland;

Note: This criterion should be renumbered c) with all subsequent criteria renumbered accordingly.

Comment: We are fully cognisant of the presence of ancient woodland surrounding the site and the previously submitted illustrative masterplan was prepared taking full account of the requirements imposed by the standing advice from Natural England and the Forestry Commission. Furthermore, expert advice has been secured from our in-house Ecology team to ensure that the

masterplan layout is designed in such a way that minimises its impact on the ancient woodland. We consider that part (b) of the site allocation requirements can be fully complied with.

- c) provide a 20m buffer zone to Ancient Woodland. This should be free from development including any road construction, and all housing positioned along the Ancient Woodland should front onto it to minimise impact onto the sensitive habitat;

Comment: The previously submitted illustrative masterplan clearly complies with this requirement by providing 20-metre wide buffers to the Ancient Woodland located both to the north and south of the two parcels. In addition, as recommended by Natural England's standing advice, the houses are orientated so they face towards the Ancient Woodland to ensure impact on the sensitive habitat is minimised. We consider that part (c) of the site allocation requirements can be complied with.

- d) ensure no loss and maintain the integrity of habitats associated with the Local Wildlife Site through the maintenance of suitable vegetated buffers, habitat linkages, and implementation of measures to minimise potential adverse indirect effects of development including recreational pressure;

Comment: The previously submitted illustrative masterplan demonstrates how the development of the site could be achieved in a sensitive manner through:

- being off-set from the boundary of the Ancient Woodland;
- the provision of a new section of hedgerow along the eastern boundary of the site;
- the retention of the woodland shaw dividing the two fields; and
- the provision of green corridors through the two development parcels;
- Recreational pressure arising from the development is eased through the provision of generous private gardens to each property; and
- the provision of elements of public open space at both the eastern and western ends of the site.

We consider that part (d) of the site allocation requirements can be complied with.

- e) retain features of local value including the central tree belt, boundary tree line and vegetation along the stream. Where appropriate, enhance these features and the wider site through management and complimentary habitat creation using native species that reflect the local character of the surrounding woodland to form a new green corridor achieving a net gain in biodiversity. Any new trees removed should be replaced on a 1:1 basis;

Comment: There will be very limited impact on any existing trees or woodland based on the site masterplan. All areas of Ancient woodland adjoining the site have 20m buffers made up of new native vegetation. The existing woodland shaw dividing the northern and southern parcels will be retained and will link with the existing hedgerow at its eastern end which will be retained, enhanced and extended. It will also link with a new green corridor of trees and vegetation linking across the site central running north / south. The western boundary vegetation will be retaining and widened to provide a wider landscape buffer with the SDNP to the west, with a short section removed to allow for site access into the site. There will be a cumulative increase in the number of trees, hedgerows and vegetation found across the site in total. We consider that part (e) of the site allocation requirements can be complied with.

- f) conserve the setting of the South Downs National Park by enhancing visual screening from Titnore Lane through creation of a landscape buffer;

Comment: It is fully recognised that the site lies in a sensitive location with the South Downs National Park boundary lying to both the north of the site and along the western side of Titnore

Lane. The previously submitted illustrative masterplan demonstrates how a landscape buffer can be provided between development and the SDNP boundary to the west. To the north there is already the 20-metre offset proposed to the northern boundary with the Ancient Woodland. To the west, the proposed offset from Titnore Lane itself is up to 40 metres which provides considerable scope to provide visual screening with native species planting. We consider that part (f) of the site allocation requirements can be complied with.

- g) careful consideration should be given to the effects of artificial lighting within the development on the National Park, Ancient Woodland and Local Wildlife Site;

Comment: The sensitivity of the site to artificial lighting is acknowledged given the proximity of these designations and therefore care will be taken to ensure that a residential layout has minimal impact from its lighting design. Requirements can be secured through a future planning application and the need to comply with suitably worded planning conditions. We consider that part (g) of the site allocation requirements can be complied with.

- h) adopt the sequential approach to site layout so the most vulnerable development types are located in the areas of lowest flood risk first, taking account of all sources;

Comment: In terms of fluvial flood risk, the Adur & Worthing Councils SFRA, Appendix C Fluvial and Tidal Food Zones map shows that the extreme south eastern corner of the two parcels of land is located in Flood Zone 3b. The previously provided illustrative Masterplan keeps development away from this south eastern corner and therefore the fluvial flood risk would be minimal. Even when taking account of climate change, the illustrative Masterplan layout is clear of the expanded areas.

In terms of surface water flooding, the Adur & Worthing Councils SFRA, Appendix E Risk of Flooding from Surface Water map shows there is a risk on a strip of land along the entire extreme eastern boundary of the proposed allocation site but again, the previously submitted illustrative Masterplan does not indicate development in this zoning.

Finally, in terms of groundwater flooding, the Adur & Worthing Councils SFRA, Appendix H JBA Groundwater Flood Risk Mapping indicates that groundwater levels are at least 5metres below the ground surface.

For the above reasons we consider that the previously submitted illustrative Masterplan adequately addresses the issues of potential flood risk on the site.

- i) deliver a package of sustainable travel measures including enhancements to walking & cycling facilities. EV charge points (with a power output of at least 7kW) should be provided for all residential units, fitted ready for first occupation.

Comment: The residential development can be designed to allow easy walking and cycling routes. As explained in relation to criterion b) above, pedestrian routes connecting to the surrounding area can be provided. The provision of electric vehicle charge points for all dwellings will soon be a mandatory requirement under the Building Regulations in any event and so their provision is a given. We consider that part (i) of the site allocation requirements can be complied with.

Please set out what modification(s) you consider necessary to make the Submission Draft Local Plan legally compliant or sound, having regard to the matter you have identified above where this relates to soundness. You will need to say why this modification will make the Submission Draft Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(continue on a separate sheet/expand box if necessary)

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If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes

☐

NO

X

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: The inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

08.03.21

Office use Only	
Comment number	SDWLP-33
Date received	

Submission Draft Worthing Local Plan January 2021

Regulation 19 (Publication Stage) Comments Form

This consultation runs from Tues 26th Jan to Tues 23rd March 2021

How to submit your comments

This response form has two parts:

- Part A: Personal Details
- Part B: Your representation(s)

Both Part A and Part B of the form need to be completed in order for your representation(s) to be valid. Please fill in a separate sheet for each representation (Part B) you wish to make. You do not need to fill out Part A for each representation provided that all representations made are securely attached.

Forms must be returned by the latest 5pm Tuesday 23rd March 2021

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Or return a hard copy of the form:

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Portland House, 44 Richmond Road, Worthing, BN11 1HS

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

Part A - Contact Details			
First name	Nigel		
Last name	Abbott		
Organisation	Tetra Tech Limited on behalf of Mr C Somerset		
Address line	11 th Floor		
Address line	1 Angel Court		
Town	London		
Postcode	EC2R 7HJ	Telephone	020 7250 7511
Email	nigel.abbott@tetrattech.com		

Signed		Date	08.03.2021
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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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<u>Use of information</u>
<p>All data will be stored securely in line with the GDPR. 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. We cannot accept or report confidential or anonymous responses. Further information about how personal information is processed can be found in the Planning Policy Privacy Notice:</p> <p>https://www.adur-worthing.gov.uk/planning-policy/privacy-notice/</p>

Part B

Please use a separate sheet for each representation

To which part of the Submission Draft Local Plan does this representation relate?

Policy

DM2

Paragraph

Map Extract

Do you consider the Submission Draft Local Plan:

Legally compliant?

Yes

X

Don't know

No

Sound?

Yes

Don't know

X

No

Complies with the Duty to Cooperate?

Yes

X

Don't know

No

Please give details of why you consider the Submission Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Submission Draft Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

We have indicated that we don't know whether the plan is sound in relation to part b of Policy DM2 which states family housing should achieve a net density of a minimum of 35 dwellings per hectare with lower densities being appropriate in exceptional circumstances if it is needed to be compatible with its surroundings.

Our particular concern is in relation to site allocation A13, Titnore Lane (which we have separately supported on behalf of our client the landowner), where the site area is listed as 6.5 hectares and site capacity is indicated as 60 residential units, substantially below the minimum 35 dwellings per hectare minimum.

We can confirm that the gross red line site area of the land as highlighted in the proposed site allocation A13 is 6.9 hectares. It is accepted that taking account of the site development requirements which are considered to be, on balance, reasonable that the net site area is substantially reduced to 3.35 hectares.

However, applying the proposed minimum site density of 35 dwellings per hectare set out in part b of the policy would suggest a capacity of some 117 units as opposed to the 60 units suggested in Site Allocation A13.

It is noted that the policy allows for lower densities to be delivered in certain exceptional circumstances. Our expectation would be that once a firm proposal is drawn up for the Titnore Lane site that a higher number of units would be deemed acceptable.

(continue on a separate sheet/expand box if necessary)

Please set out what modification(s) you consider necessary to make the Submission Draft Local Plan legally compliant or sound, having regard to the matter you have identified above where this relates to soundness. You will need to say why this modification will make the Submission Draft Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(continue on a separate sheet/expand box if necessary)

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If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes

☐

NO

X

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: The inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

08.03.21

Office use Only	
Comment number	SDWLP-34
Date received	

Submission Draft Worthing Local Plan January 2021

Regulation 19 (Publication Stage) Comments Form

This consultation runs from Tues 26th Jan to Tues 23rd March 2021

How to submit your comments

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

Part A - Contact Details		
First name	Rob	<u>On behalf of</u> Richard
Last name	Huntley	Andrew
Organisation	RHPC	Hargreaves Management Ltd
Address line	██████████	Rustington House
Address line		Worthing Road
Town	██████████	Rustington
Postcode	██████████	BN16 3PS
Telephone	██████████	01903 777 771
Email	████████████████████	rra@hprop.co.uk

Signed	████████████████████	Date	8 March 2021
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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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<p align="center"><u>Use of information</u></p> <p>All data will be stored securely in line with the GDPR. 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. We cannot accept or report confidential or anonymous responses. Further information about how personal information is processed can be found in the Planning Policy Privacy Notice:</p> <p align="center">https://www.adur-worthing.gov.uk/planning-policy/privacy-notice/</p>
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Part B
Please use a separate sheet for each representation

To which part of the Submission Draft Local Plan does this representation relate?

Policy	SS2	Paragraph		Map Extract	
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Do you consider the Submission Draft Local Plan:

Legally compliant?	Yes		No	
	Don't know	X		
Sound?	Yes		No	X
	Don't know			
Complies with the Duty to Cooperate?	Yes		No	
	Don't know	X		

Please give details of why you consider the Submission Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Submission Draft Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Although it is accepted that the tight boundaries, together with physical and policy considerations, may limit the extent to which Worthing's housing needs are able to be met in the town, the scale of housing development provided for in the Draft Plan is insufficient. The quantum of new homes to be provided should therefore be increased, albeit that it may not be possible to provide sufficient sites to meet the whole of the objectively assessed need.

The level of objectively assessed need stated in paragraph 3.13 of the Draft Plan is 14,160 new homes over the plan period. This would equate to some 885 new dwellings per year. However, the Draft Plan provides, in Policy SS2, for only around 3,672 dwellings overall, equivalent to an annualised rate of only 230 per year. Planning for development to meet only about one quarter of the objectively assessed need is insufficiently ambitious and inappropriate.

Albeit that the overall housing provision figure stated in Policy SS2 is expressed to be a minimum, the Plan would be unsound if adopted as drafted. Additional specific sites should be identified in the Plan, and included in the list of sites within Policy SS2, better to address stated Strategic Objectives SO1 and SO2 the Plan, and more closely accord with the scale of development that has been objectively assessed as needed.

(continue on a separate sheet/expand box if necessary)

Please set out what modification(s) you consider necessary to make the Submission Draft Local Plan legally compliant or sound, having regard to the matter you have identified above where this relates to soundness. You will need to say why this modification will make the Submission Draft Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Land to the east of allocated site A1 to the north of Beeches Avenue should be included as a specific allocation for housing development in the list contained in Policy SS2. That land lies within the defined built-up area of Worthing and is confirmed as suitable for housing development in the text at pages 72 and 73 of the Plan, which comments that access is required across the land to enable development of site A1.

Although the land currently accommodates a football ground used by Worthing United FC, the Council's playing pitch strategy confirms that there is no deficiency of such provision in the Town. In any event, the ground does not meet the security of tenure requirements set out in the Football Association's ground grading criteria. Furthermore, the Club has identified an alternative location which it says would be ideal for its requirements.

The Worthing United Football Ground, shown on the attached plan, should be identified as an additional entry in the list of allocated sites contained in Policy SS2, with an approximate capacity of around 60 dwellings.

(continue on a separate sheet/expand box if necessary)

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If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes

X

NO

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Consideration of the appropriate balance to be struck between meeting housing requirements and other factors will inevitably involve a range of matters, including the deliverability of development on specific sites. Participation in an oral process, together with others concerned with different potential sites, would be likely to better assist the Inspector to reach appropriate conclusions in that regard.

Please note: The inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date:

8 March 2021



**WORTHING FOOTBALL GROUND
LYONS WAY, WORTHING**

Office use Only	
Comment number	SDWLP-35
Date received	11.03.21

Submission Draft Worthing Local Plan January 2021

Regulation 19 (Publication Stage) Comments Form

This consultation runs from Tues 26th Jan to Tues 23rd March 2021

How to submit your comments

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Part A - Contact Details			
First name	Christopher		
Last name	Hare		
Organisation			
Address line	[REDACTED]		
Address line	[REDACTED]		
Town	[REDACTED]		
Postcode	[REDACTED]	Telephone	[REDACTED]
Email	[REDACTED]		

Signed	[REDACTED]	Date	11/3/2021
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Note: Unless you request otherwise <i>(by putting a cross in the box to the right)</i> , 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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Part B
Please use a separate sheet for each representation

To which part of the Submission Draft Local Plan does this representation relate?

Policy	A9	Paragraph	4.29/4.30	Map Extract	N/R
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Do you consider the Submission Draft Local Plan:

Legally compliant?	Yes	X	No	
	Don't know			
Sound?	Yes		No	X
	Don't know			
Complies with the Duty to Cooperate?	Yes	X	No	
	Don't know			

Please give details of why you consider the Submission Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Submission Draft Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Whilst the underlying need to provide much needed housing within the Worthing area , the plan to redevelop the old Gas Works site (A9) , and more particularly the submitted plan by Berkeley Homes is ill conceived. The proposed density cannot be achieved if the Borough Council "Policy Requirements" set out in the overarching plan – with specific references to DM1 and DM2 is adhered to.

REASONS FOR OBJECTION

- The current plan (A9) suggests provision for 150 units on the old Gas Works site – this is nearly double the original number of dwellings submitted under the Regulation 18 plans – the original plan suggesting 85 town houses and flats. The current proposal of 150 units does not specify the exact nature of the proposed development as per A9, but based on the original Regulation 18 proposal it can only be assumed that the current A9 plan is for high rise flats.
 Of even greater concern is the recent proposal submitted by Berkeley Homes with the developer submitting plans for 210 one bedroomed flats over a 9 storey structure. The proposal also suggests on-site parking at a level of only 0.6 spaces per flat.
 It is suggested that detailed plans for this development are to be submitted sometime in March 2021. Their pre-application proposals clearly show only one-bedroomed units are proposed which although achieving high density, does not fit with the "Housing Mix Policy" DM1 nor the "SHMA" which identifies a greater need for 2-3 bedroom accommodation within the Worthing area.
 It has not yet been demonstrated that either A9 or the Berkeley Homes proposals fit Policy DM1 for schemes to "deliver sustainable mixed and balanced communities.
 For the reasons above the plans are ill conceived do not meet Policy Requirements and are therefore undeliverable.

2. There is a well understood need to utilise development land to the best advantage having due regard for the size and potential capacity, taking into account a number of factors. The site at A9 has to consider a number of constraints: Site context and character, nearby Conservation areas – in this case Beach House Park to the east of the proposed development, and the views to the South Downs.
Due consideration of road access has not been fully or properly thought out. The Development is in Park Road – which itself is very narrow , a designated “One Way” road with very limited “On Street Parking”. The existing road network , with Lyndhurst Road being a major thoroughfare for general traffic, buses and access to the main entrance to Worthing Hospital would not support an access road into the new development without causing problems , and an access road leading into Park Road for the possible number of cars would also be an issue for traffic and residents in Park Road itself.
Overall the proposed redevelopment at A9 and the Berkeley proposal can only have an adverse effect on the character of the area, is ill conceived and undeliverable.
3. Any structure on the proposed site – especially one proposed at 9 storeys will have an adverse effect on the enjoyment of light for those residents on Lyndhurst Road and the Public House.
4. The proposed capacity for the number of units must allow for a similar number of car parking spaces as the current “Car Parking Zone 3” is currently over maximum capacity. The Adur and Worthing website currently (as at 8/2/21) shows a waiting list of 8 for their “1st Permit” , and 53 for their “ 2nd Permit”.
5. The proposed development site currently has a number of parking spaces for NHS Workers at Worthing Hospital. Once this is removed for site clearance and building works this will have an immediate negative effect on Essential Workers parking/on street parking and general transport issues.

(continue on a separate sheet/expand box if necessary)

Please set out what modification(s) you consider necessary to make the Submission Draft Local Plan legally compliant or sound, having regard to the matter you have identified above where this relates to soundness. You will need to say why this modification will make the Submission Draft Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

1. The number of proposed units should be reduced to the levels proposed by “Regulation 18” or a full study into the full impact of increased traffic, access, and both on site and off street parking needs to be undertaken if any increase above the “Regulation 18” plans are to be seriously considered
2. The A9 proposal must take into consideration local character and heritage constraints – these have not been fully considered in Para 4.29 and 4.30 within the description of the site.
3. There must be a proposal to have 1 parking space per designated housing unit on this site as the existing local area and CPZ3 cannot accommodate any increase having regard to the current “Waiting lists”.
4. A9 makes not provision to consider the existing area – with particular regard to the nature size and height of neighbouring properties along the full length of Park Road (both sides of Lyndhurst Road) , and those properties opposite the proposed development on Lyndhurst Road itself – all being low rise family housing, and the highest being 3 storey retirement accommodation in both Birch Tree Court and Kings Hall. It is interesting to see that A10 has a proposal that “do not have an unacceptable impact on the amenity of neighbouring residents” , and A11 requires any redevelopment to “be sensitive to the surrounding

Conservation Areas” - Why are these requirements not deemed necessary for A9? It should be a pre-requisite for any redevelopment and must be added to A9 .

5. A mix of accommodation meeting the true “local housing need “ must be considered as the right way forward

(continue on a separate sheet/expand box if necessary)

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If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes

YES

NO

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Developers frequently change plans and it is likely an increased number of units will be proposed given the passage of time. Any suggestion that a 9 storey structure is warranted based on the density numbers or the height of the old gas works is unfounded and existing constraints do not support this.

A lower level mixed housing site with less density than that proposed would sit better in the locale and would not affect light or the view of the South Downs from the seafront when looking down Park Road.

Please note: The inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

[Redacted Signature]

Date:

11/3/2021

Office use Only	
Comment number	SDWLP-36
Date received	

Submission Draft Worthing Local Plan **January 2021**

Regulation 19 (Publication Stage) Comments Form

This consultation runs from Tues 26th Jan to Tues 23rd March 2021

How to submit your comments

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Part A - Contact Details			
First name	Emma		
Last name	Stenning		
Organisation	N/A		
Address line	[REDACTED]		
Address line	[REDACTED]		
Town	[REDACTED]		
Postcode	[REDACTED]	Telephone	[REDACTED]
Email	[REDACTED]		

Signed	[REDACTED]	Date	14/03/21
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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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<https://www.adur-worthing.gov.uk/planning-policy/privacy-notice/>

Part B

Please use a separate sheet for each representation

To which part of the Submission Draft Local Plan does this representation relate?

Policy

A9

Paragraph

4.29/4.30

Map
Extract

N/R

Do you consider the Submission Draft Local Plan:

Legally compliant?

Yes

X

No

Don't know

Sound?

Yes

No

Don't know

Complies with the Duty to Cooperate?

Yes

X

No

Don't know

Please give details of why you consider the Submission Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Submission Draft Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Although I support the principle of development on this site for much needed family housing and in particular the policy requirement to 'address contamination issues' and to provide 'high quality residential', the Policy is not sound. This is because I do not believe the indicative capacity has taken into account the constraints of the site. I believe that a development at the density proposed cannot be achieved whilst still meeting the other policy requirements set out in the Plan including DM1 and DM2 and therefore the current allocation is undeliverable.

Reasons for objection

1. The site cannot deliver the capacity of homes identified. The Regulation 18 version of this Plan indicated a capacity of 85 town houses and flats. In order to achieve the new indicative

number of 150 units it is highly likely that any future redevelopment scheme would only comprise a flatted development. Indeed, it is interesting to note that the developer is currently consulting on a proposal for 210 one-bedroom flats over 9 storeys with 0.6 parking spaces per flat on this site. They propose to submit the planning application in March 2021. The pre-application proposals are helpful in that they clearly illustrate that in order to achieve high densities only one bed units are likely to be delivered. It has therefore not been clearly demonstrated that this site can accommodate the anticipated number of units and still be in accordance with your housing mix policy DM1 and your SHMA which identifies that the most significant need in Worthing is for 2/3 bed housing. Although Para 5.8 of the Plan indicates that whilst higher density flatted schemes are more likely to deliver smaller properties, it still stresses that they "should also include a proportion of larger units with 3 or more bedrooms". Policy DM1 requires schemes to 'deliver sustainable, mixed and balanced communities'. The current allocation at the densities proposed will not be able to meet other policy requirements and is therefore undeliverable.

2. I acknowledge that development proposals must make the most efficient use of land and I support Policy DM2 - Density. I support the fact that Policy DM2 makes clear that the capacity of any site must be based on a design led approach which consider the site context and character. The site constraints of A9 need to be recognised, particularly in respect of the need to be cognisant of the character of the nearby Conservation Areas and Beach House Park to the east. The proposed allocation does not fully recognise the nature of the road network around the site. Park Road is one way and very narrow, Lyndhurst Road is heavily constraint and highly residential in this location. It is a very busy road and is the main road to the A&E hospital. In view of these constraints I do not believe that the Proposed Allocation for A9 can deliver the indicative capacity without having a dramatic negative impact on the character of the area. It is therefore undeliverable.
3. The capacity of the site will also be dependent on the amount of parking proposed. The pre-application scheme clearly illustrates that the site could not deliver the number of units and the necessary levels of parking. The CPZ is currently oversubscribed and this will be exacerbated by the loss of hospital parking from this site. There needs to be an increased emphasis on the need for the proposals to provide either onsite parking to meet the need generated by the development or onsite measures to encourage sustainable transport and offsite contributions.

(continue on a separate sheet/expand box if necessary)

Please set out what modification(s) you consider necessary to make the Submission Draft Local Plan legally compliant or sound, having regard to the matter you have identified above where this relates to soundness. You will need to say why this modification will make the Submission Draft Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

1. The indicative number of units on the site needs to be reduced. This proposed modification is justified on the grounds that the higher indicative capacities are undeliverable.
2. Paras 4.29 and 4.30, which set out the site description need to be clear about heritage and local character constraints. This proposed modification is justified on the grounds that it would bring the proposed Allocation A9 in line with the requirements of Policy DM2.
3. There is an inconsistency in how development requirements are expressed for this site allocations. I note that Site A10 requires the development proposals to "not have an unacceptable impact on the amenity of neighbouring residents" and Site A11 requires any redevelopment to "be sensitive to the surrounding Conservation Areas etc". Similar requirements should be included in the list of development requirements for Site A9 and should include the following:
 - protection the character of the existing area, which is predominately low rise, family housing;
 - consideration of the two adjacent conservation areas at Warwick Gardens and Little High Street;
 - the requirement for a mix of homes that take account of the character of the area and the existing built environment and to properly address local housing need.
4. The requirement of 1 parking space per unit given the huge demand for parking in the area. Alternatively, the policy must emphasise the need for the proposals to provide onsite measures to encourage sustainable transport and provide offsite contributions
5. The photograph in the draft Local Plan needs to be replaced with an up to date picture. The gas holder was removed many years ago.

(continue on a separate sheet/expand box if necessary)

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If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes

Yes

NO

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

I believe the developer/promoter of the site will seek an even higher density than the proposed indicative amount in the draft plan of 150 units. They will argue that the 'abnormal' cost of decontamination will require higher densities to make the development viable. They will also argue that the height of the gas holder justifies nine storeys. Many people have moved into the area since the holder was removed many years ago. I do not think the density levels should be increased.

Given the location of the site, on the edge of the town centre with predominately family housing surrounding it, already constrained roads and parking, close to the hospital, I believe the site should provide a mix of homes. Furthermore, proper consideration should be given to the provision of on-site parking and/or the provision of on-site measures to encourage sustainable transport.

As a local resident, there is already a challenge with the number of people living here versus key services e.g. doctors, dentists etc. We believe that a highly populated development will disproportionately add to these problems.

Additionally, there are several similar developments around the town that are focussed on flats and we believe that a mews style development with a mix of property types would be much more suitable to the predominately family housing style of the local area.

Please note: The inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

[Redacted Signature]

Date:

14/03/21

Office use Only	
Comment number	SDWLP-37
Date received	

Submission Draft Worthing Local Plan **January 2021**

Regulation 19 (Publication Stage) Comments Form

This consultation runs from Tues 26th Jan to Tues 23rd March 2021

How to submit your comments

This response form has two parts:

- Part A: Personal Details
- Part B: Your representation(s)

Both Part A and Part B of the form need to be completed in order for your representation(s) to be valid. Please fill in a separate sheet for each representation (Part B) you wish to make. You do not need to fill out Part A for each representation provided that all representations made are securely attached.

<p>Forms must be returned by the latest 5pm Tuesday 23rd March 2021</p>
--

You can complete this form on-line: www.adur-worthing.gov.uk/worthing-local-plan

Or return a hard copy of the form:

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

Or by e-mail to: planning.policy@adur-worthing.gov.uk

Further guidance

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If you require any advice on completing this form please feel free to contact the Planning Policy Team via email (as above) or telephone on 01273 263000.

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

Part A - Contact Details			
First name	Mark		
Last name	Stenning		
Organisation	N/A		
Address line	[REDACTED]		
Address line	[REDACTED]		
Town	[REDACTED]		
Postcode	[REDACTED]	Telephone	[REDACTED]
Email	[REDACTED]		
Signed	[REDACTED]		Date 14/3/2021

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

All data will be stored securely in line with the GDPR. 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. We cannot accept or report confidential or anonymous responses. Further information about how personal information is processed can be found in the Planning Policy Privacy Notice:

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Part B

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Yes

Yes

NO

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As a local resident, there is already a challenge with the number of people living here versus key services e.g. doctors, dentists etc. We believe that a highly populated development will disproportionately add to these problems.

Additionally, there are several similar developments around the town that are focussed on flats and we believe that a mews style development with a mix of property types would be much more suitable to the predominately family housing style of the local area.

The presentation that has been used to advertise and contextualise the consultation states that the goal is to "reconnect these sites with the local community," it should be noted that none of the accompanying photos show buildings to the height that is being proposed for this development.

Please note: The inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

[Redacted Signature]

Date:

13/3/2021

Submission Draft Local Plan Policy A9 paragraph 4.29/4.30

1 message

Sandra Chandler [REDACTED]

15 March 2021 at 10:41

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

Although as a family who have been associated with this area of Worthing for 50 years we support in principle the development of this site for much needed family housing we do not support the proposal in its current form.

210 one bedroom flats are not designed for families. A 9 storey development would not be in keeping with any other building in the area architecturally. Park Road is narrow and one way. That section of Lyndhurst Road is narrow and leads in to a busy roundabout.

Parking is already at a premium in that area, on the outskirts of the town centre and adjacent to the Hospital. The latter if it provided adequate parking for staff and patients would not currently be using part of this site as an overflow car park. The redevelopment of the old Aquarena site has meant the loss of a multi-storey parking facility and the local roads already get used for parking (often both sides of the road, up on to pavements and narrowing then for access, including to the Hospital) by those using the pool when the current timed parking restrictions are not in place. Provision of inadequate parking slot numbers for the proposed housing will impact further as will the fact that slots will no longer be available for the Hospital to use for parking.

The site needs redevelopment but could this be something smaller, providing family accommodation, allowing for adequate parking and in keeping with the surrounding residential properties?

Sandra Chandler
[REDACTED]

GORING RESIDENTS' ASSOCIATION

Est: 1944

www.goringresidents.org.uk



Chairman

Mrs Eleanor Millward

chairman@goringresidents.org.uk

WORTHING LOCAL PLAN

I am the chairman of the Goring Residents' Association and represent nearly 2000 members.

The committee and I have read the Local Plan, discussed it with members and we would like to thank Worthing & Adur Council for compiling such a comprehensive report and giving residents the opportunity for comments.

We would like to confirm that Worthing & Adur Council Local Plan -

- Complied with legal requirements
- Co-operated with local residents
- The plan is a sound document

Eleanor Millward

for and on behalf of the Goring Residents' Association

Adur & Worthing Councils
Planning Policy
Worthing Town Hall
Chapel Road
Worthing
West Sussex
BN11 1HA

14th March 2021

I wish to register my **OBJECTION** to the Submission Draft Worthing Local Plan Consultation (January 2021) – Development North of Beeches Avenue.

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

Future generations will not thank us for the choking of an important major road and the irreversible destruction of Worthing's countryside. The people of Worthing and Borough Councillors have already expressed their opinion of this matter, with an overwhelming rejection of any development on the land north of Beeches Avenue.

Yours sincerely,

Mr & Mrs L R Jones

Our Ref: MV/ 15B901605

17 March 2021

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



Dear Sir / Madam

**Worthing Local Plan Regulation 19
Representations on behalf of National Grid**

National Grid has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

Response

We have reviewed the above 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 their networks.

Please see attached information outlining further guidance on development close to National Grid assets.

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 their assets. Please remember to



consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid's assets.

We would be grateful if you could add our details shown below to your consultation database, if they are not already included:

Matt Verlander, Director

nationalgrid.uk@avisonyoung.com

Avison Young
Central Square South
Orchard Street
Newcastle upon Tyne
NE1 3AZ

Spencer Jefferies, Town Planner

box.landandacquisitions@nationalgrid.com

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

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



Matt Verlander MRTPI

Director

0191 269 0094

matt.verlander@avisonyoung.com

For and on behalf of Avison Young

Guidance on development near National Grid assets

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's '*Guidelines for Development near pylons and high voltage overhead power lines*' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their '*Guidelines when working near National Grid Electricity Transmission assets*', which can be downloaded here: www.nationalgridet.com/network-and-assets/working-near-our-assets

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's '*Guidelines when working near National Grid Gas assets*' can be downloaded here: www.nationalgridgas.com/land-and-assets/working-near-our-assets

How to contact National Grid

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please contact:

Avison Young (UK) Limited registered in England and Wales number 6382509.
Registered office, 3 Brindleyplace, Birmingham B1 2JB. Regulated by RICS



- National Grid's Plant Protection team: plantprotection@nationalgrid.com

Cadent Plant Protection Team

Block 1

Brick Kiln Street

Hinckley

LE10 0NA

0800 688 588

or visit the website: <https://www.beforeyoudig.cadentgas.com/login.aspx>

Office use Only	
Comment number	SDWLP-42
Date received	

Submission Draft Worthing Local Plan January 2021

Regulation 19 (Publication Stage) Comments Form

This consultation runs from Tues 26th Jan to Tues 23rd March 2021

How to submit your comments

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Portland House, 44 Richmond Road, Worthing, BN11 1HS

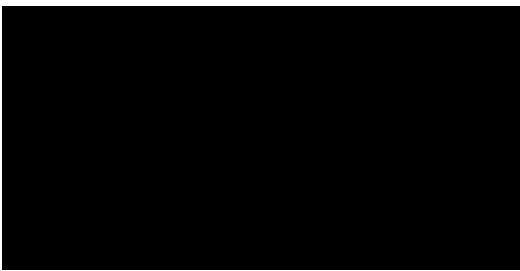
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Part A - Contact Details			
First name	Dennis		
Last name	Pope		
Organisation	Lichfields (on behalf of GlaxoSmithKline plc)		
Address line	The Minster Building, 21 Mincing Lane		
Address line 2			
Town	London		
Postcode	EC3R 7AG	Telephone	020 7837 4477
Email	dennis.pope@lichfields.uk		

Signed		Date	19/03/21
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Part B
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Policy

Site A5

Paragraph

Map
Extract

x

Do you consider the Submission Draft Local Plan:

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Set against the tests of soundness set out at paragraph 35 of the National Planning Policy Framework, it is considered that a modification to the Broadwater Business Park Employment Area Boundary to include the entire GlaxoSmithKline site is required to justify that the Submission Draft Worthing Local Plan is positively prepared, justified, effective and consistent to national policy. Please refer to the attached Statement of Representation for further details.

Through this representation GSK is also seeking to ensure that any development that comes forward on the proposed Decoy Farm site does not prejudice the GSK pipelines that take effluent away from their site. More details are also provided within the attached Statement of Representation.

Please set out what modification(s) you consider necessary to make the Submission Draft Local Plan legally compliant or sound, having regard to the matter you have identified above where this relates to soundness. You will need to say why this modification will make the Submission Draft Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

GSK is seeking a modification to the boundary of the designated Key Industrial Estate and Business Park referred to as "Broadwater Business Park Employment Area" to include the entire GSK site. Further details, including illustrations, are provided within the attached Statement of Representation.

Site Allocation A5 should also be amended to recognise that constraint that the GSK pipelines present to future development

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes

☐

NO

x

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: The inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

A rectangular box containing a solid black rectangle, indicating that the signature has been redacted.

Date:

19/03/21

Statement of Representation

Date 19 March 2021
To Worthing Borough Council
From Lichfields (on behalf of GlaxoSmithKline plc)

Subject Submission Draft Worthing Local Plan – Regulation 19

Summary

Lichfields is instructed by GlaxoSmithKline plc (GSK) to make representations to the Submission Draft Worthing Local Plan (SDWLP) in respect of their manufacturing site located at Southdown View Way, Worthing.

GSK is seeking a modification to the boundary of the designated Key Industrial Estate and Business Park **referred to as “Broadwater Business Park Employment Area”** to include the entire GSK site. The Map Extract Submission Draft Appendix A (p 32) currently proposes that the Key Industrial Estates and Business Parks boundaries do not require any changes.

Set against the tests of soundness set out at para 35 of the National Planning Policy Framework (**‘the Framework’**), **it is considered that this modification is required for the following reasons:**

- a Positively prepared – the modification of the designated Key Industrial Estate and Business Park area could support the future growth needs of either GSK as an existing major employer within Worthing or other potential occupiers e.g. Allergy Therapeutics Ltd (ATL) and provide for new investment in the existing employment area. This is consistent with SDWLP Strategic Objective S08, and Policy DM11 (Protecting and Enhancing Employment Sites);
- b Justified – modification of the boundary as proposed will have the effect of including **all of GSK’s operational area as part of the Key Industrial Estate and Business Park**. This area is already in operational use, comprising a sports pitch, an effluent treatment plant and ATL building. The sports pitch is in private use by GSK employees and is not required to meet local needs;
- c Effective – the site area falls within the defined built-up area of Worthing – for which the Council is proposing to carry forward as existing in the SDWLP – and in functional terms forms part of the Broadwater Business Park Employment Area being within the GSK operational site boundary; and
- d Consistent with national policy – para 80 of the Framework requires planning policies to **“create the conditions in which businesses can invest, expand and adapt”**. The modification of the designation to safeguard and accommodate any potential future growth needs of GSK – which operates in a high-value, high-growth sector – or other occupiers such as ATL is entirely consistent with this objective. There is even greater imperative in order to support the recovery of the local economy following the COVID-19 pandemic.

On this basis, it is considered that this proposed modification to the SDWLP is entirely consistent with the tests of soundness set nationally, and therefore that the suggested change is justified.

GSK is also seeking to ensure that any development that comes forward on the proposed Decoy Farm site does not prejudice the GSK pipelines that take effluent away from their site. These pipelines run along the northern boundary of the Decoy Farm site.

In the event of a breach of the pipe, the GSK site has the capacity to hold this effluent, however the emergency tanks can do so for 48 hours. As such the GSK Worthing site would cease production after 48 hours of a breach of the line. Given that the Worthing site is a strategic site for GSK, a loss of production of this nature would adversely affect the supply of medically essential drugs to a worldwide market.

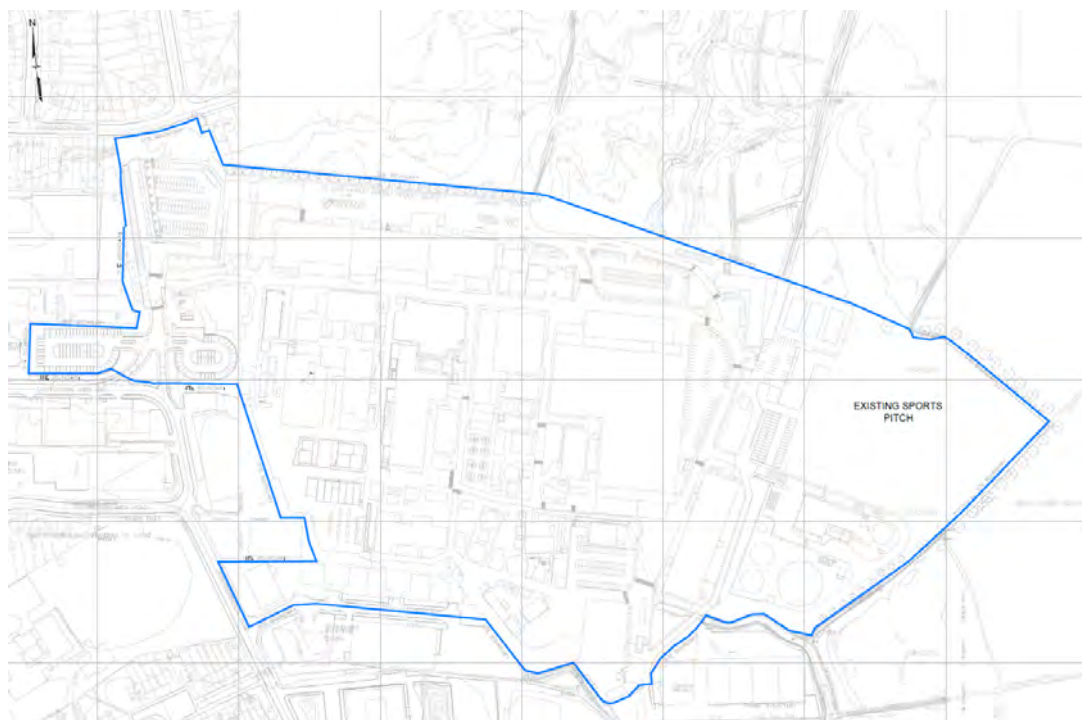
The policy guidance for development of this site should take into account his important constraint.

1.0 Introduction and background

1.1 Lichfields is instructed by GlaxoSmithKline plc (GSK) to make representation to the Submission Draft Worthing Local Plan (SDWLP) consultation in respect of the GSK site located at Southdown View Way, Worthing.

1.2 The existing GSK site covers circa 15.7 hectares of land located to the north-eastern edge of the Worthing administrative area. The site boundary is shown in Figure 1 below, edged in blue, and has been operated by GSK since the 1960's.

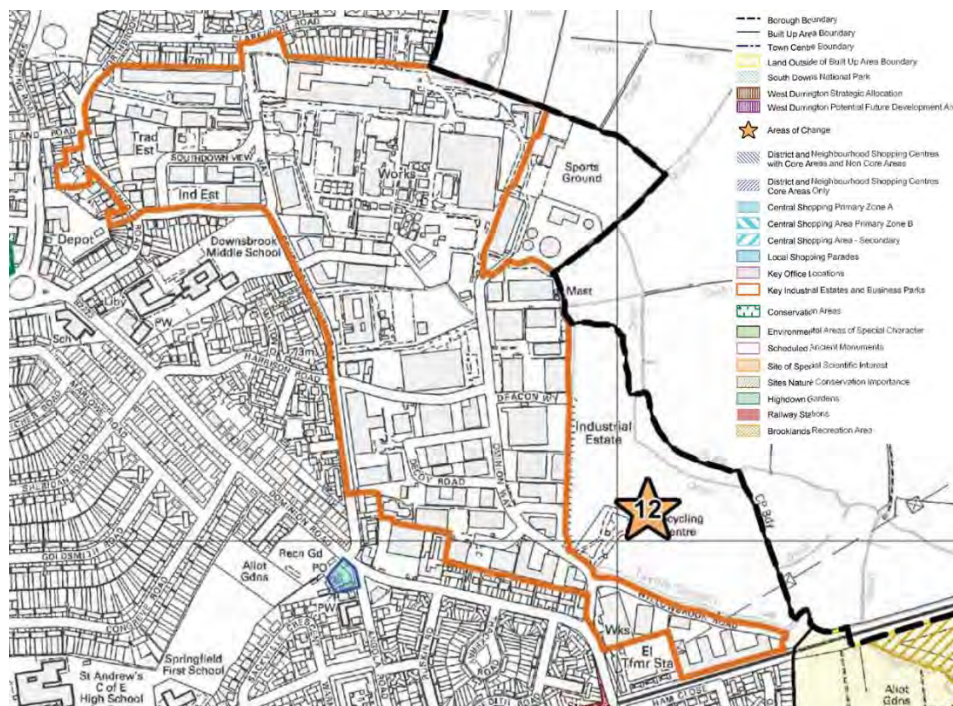
Figure 1 GSK Worthing Site Boundary



1.3 **The site's** primary function comprises pharmaceutical manufacturing operations. Buildings and hardstanding occupy over 90% of the site, with the remaining comprising a sports pitch on the eastern portion, and some small areas of landscaping. The existing buildings are industrial and house production and R&D activities, in addition to supporting utilities and ancillary structures.

- 1.4 The majority of the site already forms part of the designed Key Industrial Estate and Business Park area referred to as “**Broadwater Business Park Employment Area**”, as shown on the 2011 Core Strategy Proposals Map (edged in orange). An extract is included in Figure 2 below.

Figure 2 Extract from 2011 Core Strategy Proposals Map



- 1.5 As Figure 2 illustrates, the extent of the existing designation excludes the eastern portion of the GSK site which comprises a sports pitch, car parking, effluent treatment plant and ATL building. However, this part of the site is located within the existing built-up area boundary of Worthing. It is proposed that the Broadwater Business Park Employment Area designation be modified to include this part of the GSK operational site.
- 1.6 The Council is not currently proposing any modification to the boundary of the Broadwater Business Park Employment Area based on the Submission Draft Map Extract (January 2021). Appendix A includes Key Industrial Estate and Business Park as an element currently shown on the Core Strategy Proposals Map to be retained with no changes required. However, for the reasons set out in this statement, it is considered that a modification to the Broadwater Business Park Employment Area boundary is justified in the interests of soundness.

Relevant planning history

- 1.7 In 2014 an outline permission was granted (ref. AWDM/0311/14) for a new pharmaceutical production facility on the western part of the GSK site. As part of this approval, GSK received temporary planning permission (i.e. by 22.09.16) to convert the existing grass sports pitch into a staff car park. The need for additional car parking was triggered by the implementation of the new ABS project which removed the use of an existing car park for siting temporary buildings.
- 1.8 Three applications have been subsequently permitted for the extension of the use of the sports pitch as a car park and the western car park for construction parking and storage for an additional year (refs. AWDM/0633/16, AWDM/1146/17 and AWDM/1962/19) up to 31.12.20.

1.9 The sports pitch **is ancillary to GSK's site operations and** has always had restricted access for use solely by GSK employees, consistent with a controlled access pharmaceutical manufacturing site. Recently GSK has reinstated the sports pitch, albeit on a smaller scale than it was previously, in to accommodate the **site's car** parking capacity requirements. The provision of the sports pitch is in line with GSK initiatives to encourage health and wellbeing for their employees **and to encourage active lifestyles across GSK's workforce**. Accordingly, the pitch is only used by the employees of GSK, and there is no wider public use for either individuals or by teams.

1.10 This position will not change given the secure access arrangements which are necessary at the site.

2.0 Employment land policy considerations

2.1 It is considered that the modification of the employment designation will have the effect of **including all of GSK's operational area as part of the Key Industrial Estate and Business Park**, and better reflect the use of the site to support the pharmaceutical production function.

2.2 It is considered that this is entirely consistent with SDWLP Strategic Objective SO8 which seeks to:

"Retain and enhance key employment areas and provide a choice of employment sites to meet the needs of existing and future businesses in order to plan for a sustainable economic growth to 2036."

2.3 Similarly, the proposed modification is also consistent with draft Policy DM11 – Protecting and Enhancing Employment Sites which seeks to enhance and protect the existing industrial activities. The supporting text for this policy (para 5.150) recognises:

"Whilst the Council needs to take this protective approach it is acknowledged that the economy is always changing and adapting to new technologies and trends. Therefore, it is essential that there is flexibility in approach to allow for new forms of economic activity and employment. However, it is also important for business that when making business and investment decisions, that there is a level of commercial certainty."

2.4 In this context, the proposed modification will serve to:

- 1 Regularise the existing boundary of the Key Industrial Estate and Business Park designation to fully align with the existing GSK operational site area, and to incorporate an area that includes built development associated with pharmaceutical production;
- 2 Provide the appropriate policy support to protect and enhance the full extent of the GSK site, consistent with the wider Broadwater Business Park Employment Area within which GSK is the largest single occupier; and
- 3 Give added certainty to facilitate investment by GSK to meet the current and future growth needs of the business and its supply chain **at this site, recognising the site's role as an** important employer within the local area.

2.5 Accordingly, the modification accords with the National Planning Policy Framework with regard to planning for economic growth and business needs, specifically:

- Paragraph 80 – *"planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development."* (emphasis added)

- Paragraph 82 – *“Planning policies and decisions should recognise and address the specific locational requirements of different sectors.”* (emphasis added)

2.6 GSK has operated in Worthing and continually invested in its facilities on this site since the 1960s. The proposed modification will give equivalent policy status to the eastern part of the GSK site as applies to the rest of the GSK operational area, and to land which already forms part of the built-up area of Worthing as defined by the SDWLP.

2.7 In turn, this will ensure that the site can be brought forward to accommodate future growth needs and investment in the site.

3.0 Decoy Farm

Background

3.1 It is noted that the Decoy Farm site is proposed to be allocated in the emerging Local Plan – Site A5 – for employment use.

3.2 The analysis of the site in the draft Local Plan identifies relevant site constraints including the Teville Stream (partly culverted) and a number of watercourses that run along the site.

3.3 Of concern is that there is no reference to two GSK pipelines which run along the northern boundary (see Figure 3) and the need for their protection as part of any future development proposals. These pipelines run along the northern boundary of the Decoy Farm site. Figure 3 below shows the pipelines and extent of the easement – green hatching.

3.4 The GSK effluent pipelines were installed at a depth of 1 metre during the 1970s. There are two **pipelines: 6” and 12” that run adjacent to each other** – there is one section in the Decoy Farm estate where there is slight uncertainty of the exact route (see Figure 3) with assumed route shown between pillars 8 and 9), so any proposed development that comes forward will need to confirm the exact location of the pipes through ground surveys.

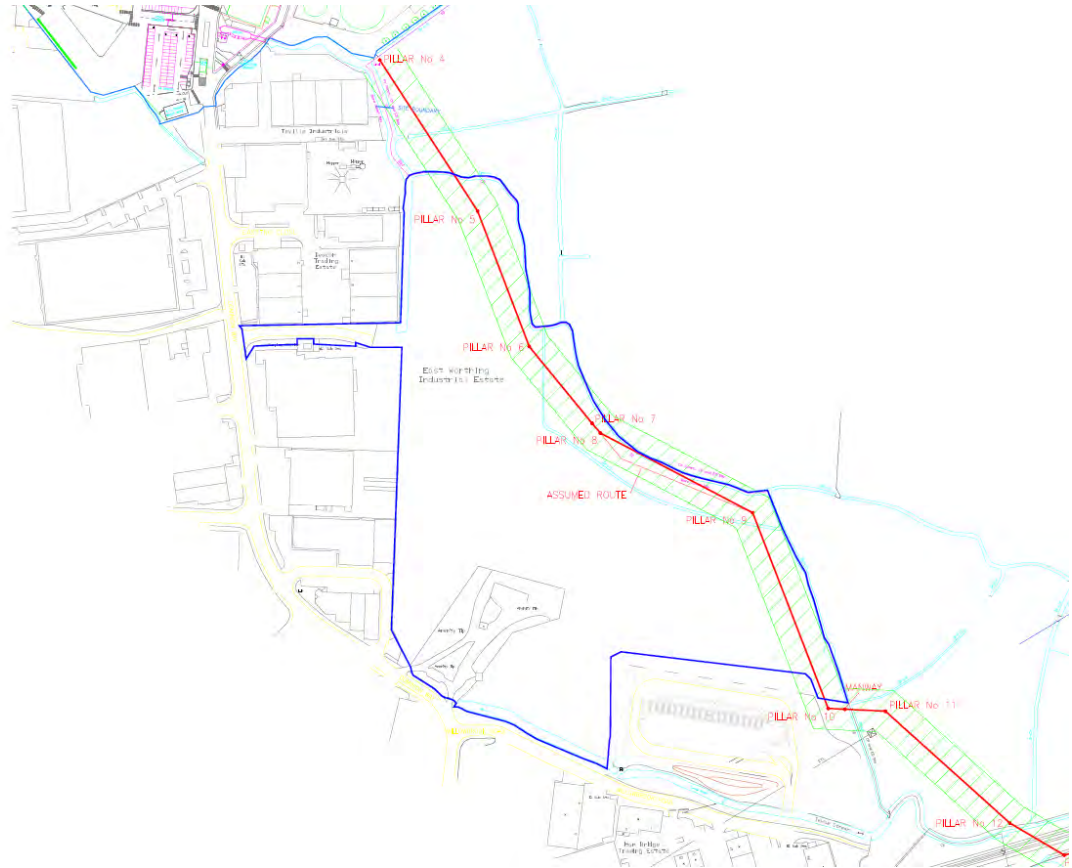
3.5 These effluent pipelines which take wastewater away from the GSK site are fundamental to the ongoing GSK manufacturing operation. The pipes carry aqueous process waste effluent at high pH values from the GSK site out to sea where it is discharged.

3.6 The pipelines benefit from a legal easement which protects the apparatus and also restricts development in its vicinity. The easements ensure that GSK has access to the pipelines at all times and these were put in place to ensure that there are no obstructions could prove detrimental to its functioning.

3.7 The easement over the pipelines in the area of Decoy Farm will need to be observed by anyone using the land and it should therefore be brought to the attention of potential developers.

3.8 In the event of a breach of the pipe, the GSK site has the capacity to hold this effluent, however the emergency tanks can do so for 48 hours. As such the GSK Worthing site would cease production after 48 hours of a breach of the line.

Figure 3 Decoy Farm Proposed Site and GSK Pipelines



- | | |
|------|--|
| 3.9 | Given that the Worthing site is a strategic site for GSK, a loss of production of this nature would adversely affect the supply of medically essential drugs to a worldwide market. |
| 3.10 | As such, it is critical that any development that comes forward on the Decoy Farm does not adversely affect the integrity of this pipeline or the ability to provide for its maintenance/repair. |
| 3.11 | As part of the current public consultation being undertaken in relation to this site GSK has already made similar comments regarding this concern. |

Comments on Site Allocation A5

- | | |
|------|---|
| 3.12 | Development requirements are identified in the draft Local Plan including: |
| 3.13 | “j) ensure layout is planned to ensure future access to existing water and/or wastewater infrastructure for maintenance and upsizing purposes.” |
| 3.14 | It is unclear from the above whether this reference is to the GSK effluent pipelines. |
| 3.15 | We would suggest that for the avoidance of doubt and to guide future development that the constraint that the pipelines present, as detailed, should be made clear as part of the development guidance for this site. |

4.0 Conclusions

- 4.1 The modification of the Key Industrial Estate and Business Park boundary for Broadwater Business Park to include the entirety of the GSK site is considered justified and consistent with

the policies set out in the SDWLP to protect and enhance the Borough's existing employment areas.

- 4.2 The eastern part of the GSK site already includes built development and ancillary uses associated with the pharmaceutical manufacturing function that exists on the wider site. This area also falls within the built-up area boundary for Worthing (to which the Council is proposing no changes through the SDWLP), and so no other policy conflict arises.
- 4.3 The modification will support future investment, in turn meeting the growth needs of the local area. These measures will serve to protect and maintain what is the one of the largest single-employer sites in the Borough.
- 4.4 Developer Guidance in relation to the Decoy Farm site, as set out at Site Allocation A5, should clearly set out the constraint that the GSK pipelines present to the future development of this site.

Office use Only	
Comment number	SDWLP-43
Date received	

Submission Draft Worthing Local Plan January 2021

Regulation 19 (Publication Stage) Comments Form

This consultation runs from Tues 26th Jan to Tues 23rd March 2021

How to submit your comments

This response form has two parts:

- Part A: Personal Details
- Part B: Your representation(s)

Both Part A and Part B of the form need to be completed in order for your representation(s) to be valid. Please fill in a separate sheet for each representation (Part B) you wish to make. You do not need to fill out Part A for each representation provided that all representations made are securely attached.

Forms must be returned by the latest
5pm Tuesday 23rd March 2021

You can complete this form on-line: www.adur-worthing.gov.uk/worthing-local-plan

Or return a hard copy of the form:

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

Or by e-mail to: planning.policy@adur-worthing.gov.uk

Further guidance

The Local Plan, the evidence base and all supporting documents are published on the Council's website (see link above). This includes a Guidance Note on how to make effective representations and you are advised to read this before making any comments. At this stage (Regulation 19) comments should only relate to whether you consider the Plan complies with legal requirements, including the duty to cooperate, and whether the document is sound.

If you require any advice on completing this form please feel free to contact the Planning Policy Team via email (as above) or telephone on 01273 263000.

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

Part A - Contact Details			
First name	Charlotte		
Last name	Mayall		
Organisation	Southern Water		
Address line	Southern House		
Address line	Lewes Road		
Town	Brighton		
Postcode	BN1 9PY	Telephone	
Email	Planning.policy@southernwater.co.uk		

Signed		Date	18 March 2021
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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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<u>Use of information</u>
<p>All data will be stored securely in line with the GDPR. 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. We cannot accept or report confidential or anonymous responses. Further information about how personal information is processed can be found in the Planning Policy Privacy Notice:</p> <p>https://www.adur-worthing.gov.uk/planning-policy/privacy-notice/</p>

Part B
Please use a separate sheet for each representation

To which part of the Submission Draft Local Plan does this representation relate?

Policy

SS5

Paragraph

Map
Extract

Do you consider the Submission Draft Local Plan:

Legally compliant?

Yes

No

Don't know

Sound?

Yes

No

Don't know

**Complies with the Duty to
Cooperate?**

Yes

No

Don't know

Please give details of why you consider the Submission Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Submission Draft Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Request boundary amendment to Policy SS5 (c) Brooklands Recreation Area and abutting Allotments

In the 2018 Regulation 18 Worthing Local Plan consultation, Southern Water made representations relating to policies SS5 and SS6 regarding the designation of a small area of land that is within Southern Water's ownership (located at the northern tip of East Worthing Wastewater Treatment Works (WTW)), as both a Local Green Gap and Local Green Space. We note that this area has since been removed from the SS6 Local Green Space designation. However it has remained within SS5, designated as a Local Green Gap. NB: East Worthing WTW treats wastewater arising from the settlements of Worthing, Lancing and Findon— the latter settlements being located within the neighbouring districts of Adur and Arun.

Whilst Southern Water understands the council's desire to maintain gaps between settlements, we are concerned that the inclusion of Southern Water's land, which forms the northern tip of the East Worthing WTW site, within the Local Green Gap designation, could place undue restrictions on any future upgrades of the WTW.

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 housing growth in Worthing, and/or to meet any future more stringent environmental permit standards. The designation of Southern Water's land under Policy SS5 could restrict its ability to carry out its statutory functions by precluding the development of any additional essential wastewater treatment infrastructure on its land. As such, the designation of this part of Southern Water's East Worthing WTW site as a Local Green Gap would conflict with the West Sussex Waste Local Plan Policy W6 which states that '*Proposals for the management of wastewater and sewage sludge will be permitted provided that: (i) where possible, new facilities are accommodated within existing wastewater treatment sites*'.

In its own supporting document, *Topic Paper 2 – Land Outside of the Built Up Area Boundary*, the council has cited NPPF paragraph 97 as supporting the designation of Local Green Gaps where open space is defined as "*all open space of public value... which offer important opportunities for sport and recreation and can act as a visual amenity*". The area of land in question however is, for public health and safety reasons, fenced off to prevent access by the public and therefore cannot offer opportunities for sport or recreation. It is also largely screened by mature trees, which limits visual access to the site, precluding any visual amenity that the site may otherwise offer.

Furthermore, we would argue that the site does not meet one of the Council's own criteria for defining the gap set out in paragraph 6.1 of Topic Paper 2, which states that the boundaries of Local Green Gaps should “*follow physical features on the ground, taking account of the need to accommodate development requirements of the Plan*”. The fence line enclosing all Southern Water's land around East Worthing WTW should constitute such a physical feature on the ground, and should also take account of the potential long term need of the site to expand into its currently vacant spaces so that the WTW may accommodate additional wastewater generated by future development in the Borough.

Paragraph 7.1 of Topic Paper 2 also states that one of “*the main function[s] of Brooklands Recreation Area and adjoining allotments Gap is to: Protect the provision of accessible open space*”. As previously stated, Southern Water's area of land is not accessible, and as such does not meet one of the stated main functions of this designation, and should therefore be removed.

(continue on a separate sheet/expand box if necessary)

Please set out what modification(s) you consider necessary to make the Submission Draft Local Plan legally compliant or sound, having regard to the matter you have identified above where this relates to soundness. You will need to say why this modification will make the Submission Draft Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Having regard to the above, Southern Water request that the boundary of the designated Local Green Gap be realigned to exclude Southern Water's land in order to appropriately reflect the land's association with the WTW, rather than the adjacent Brooklands Park and allotments. This would ensure that Policy SS5 is consistent with national policy as the gap designation would accord with the definitions of open space according to the NPPF, and Paragraph 20 (b) of the NPPF by facilitating the provision of wastewater infrastructure.

(continue on a separate sheet/expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes

☐

NO

x

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: The inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date:

1903/21

T L Moseley c/o Sylvatica Homes Limited
email : [REDACTED]

Worthing Borough Council
planning.policy@adur-worthing.gov.uk

17 March 2021

Dear Sir / Madam

Submission Draft Worthing Local Plan Consultation Regulation 19 Version (January 2021)

I write further to my submission dated 11 December 2018 and your letter dated 26 January 2021. As a stakeholder of proposed land, I write to object to the designation of the Local Green Space proposal for the southern part of Goring Gap as I consider it to be unsound reading your up-to-date documentation.

Goring Ferring Gap Proposed Local Green Space

I oppose the above Local Green Space for many reasons; the Council representation in draft form is misleading and incorrect.

- The maps shown include Arun District who have half of the southern part of Goring Gap to the west. Arun has concluded that the Gap does not fulfill the requirements for Local Green Space and, as such, have not included all of their part of the Goring Gap in their Local Plan. For this reason the map is misleading and incorrect in your Local Plan 2020-2036.
- The Council states that there are no buildings in the Gap; this is not true as there is a large water pumping station in the middle of the fields with large raised manholes at every 10m running through the fields. In addition, there are also various houses on the west side.
- The Council has suggested dog walkers and others use the land for recreation use with some sort of permission. I can categorically state that my land has no right of way and no permission has been implied or given. The same applies to the other fields owned by Persimmon and others. To make it clear, pretty much the whole of the proposed (other than a small playing field) area has no recreational use and no access. If the Council want recreation use as stated in their reasons for Local Green Space, then please only include land which has public legal recreational use.

- The map showing the proposed designated area only encompasses the fields not Ilex Way, the Plantation or the greensward and recreation ground all of which has trees and public access surrounding the proposed space; your Council are using in the summary for Local Green Space the above area benefits, ie wildlife attraction and recreation use, the actual proposal is for ploughed fields without access with a few defunct hedgerows as described by your previous landscape reports.
- The agricultural fields, which are the proposed Local Green Space, are simple fields with no access. They make up a **large extract of land** and do not fulfill government guidelines for Local Green Space.
- The Local Report Open Space conducted by Adur Council for the southern gap achieved a low quality score of 14%, one of the worst in the District. The Council are suggesting this is otherwise.
- The Council suggest the Gap has an underdeveloped coastline; unfortunately the Rampion Windfarm has changed this - Ferring Conservation have recently on their webpage that the turbines certainly dominate the view from the beach at the Goring Gap. Also, Pattersons Walk has been marred by crowds of wind turbines.
- The Council also sells concessions to run businesses from mobile vehicles on the Goring Gap roads adjacent to the greensward part of Goring Gap ie burger vans, ice cream vans and water sport lessons; this does not constitute quiet tranquility at the Goring Gap as the Council has suggested.
- The census for the Local Plan asked loaded questions about Local Green Space Goring Gap and received only a few hundred responses out of a population of some 60,000+. The Council has since proposed 100 acres in their District, taken back from a tenant farmer just up the road, to be put back to nature for public use, thus giving green space to the community.
- The Goring Gap is plagued with dumping and unsavory goings-on. Regeneration of this area in the future would overcome this; I propose to use my land for leisure use for the public. Many examples have been given in previous correspondence with the Council who seem to do everything to stop moving forward.
- I have been approached over the years by the public and clubs and also Adur & Worthing Council representatives, who were employed to look into the District needs, asking if I would offer camping to kite surfing and other water sports; my answer was yes, however, the planning department has a different view. Also, in the Local Plan the only other current campsite is to be halved and be positioned surrounded by a housing estate.

- The land is already under Article 4 which protects the land accordingly.
- The area already has large amounts of public amenity space, including Ilex Way, the Plantation, Goring greensward, the beach and National Park some 87 miles long with walks, stargazing clubs etc..

The southern Goring Ferring Gap clearly is not suitable for Local Green Space as per clear government guidelines. The Council has clearly demonstrated its motives are to stop all future development because of a few nimbys, again, in breach of the whole essence of Local Green Space. I hope that an Inspector will see my concerns and will reject Local Green Space on the Goring Ferring Gap and will steer the Council to moving forward with progress and building with good design and bring back tourism to the town to help its economy and all.

Yours sincerely

T Moseley

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

22/03/2021

Dear Sir/ Madam

Response by the Home Builders Federation to the consultation on the Worthing Local Plan

1. Thank you for consulting the Home Builders Federation (HBF) on the submission draft of the Worthing 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.
2. **We would like to submit the following representations on the Local Plan and we would welcome, in due course, participating in hearings of the Examination in Public.**

Housing needs and supply (policies SS1 and SS2)

These policies are not sound as they are not positively prepared.

3. The Council are taking forward a local plan that does not meet minimum housing needs as calculated using the standard method. Paragraph 3.25 states that the Borough has the capacity to deliver 3,672 new homes over the plan period on the basis of both national and local policies that constrain the supply of land for new development. Using the standard method and most recently published data on affordability would require the Council to deliver 885 dwellings per annum (dpa) a total of 14,160 homes over the plan period. This is a significant shortfall of 10,488 homes.
4. The HBF would agree that the Council faces significant constraints with regard to land supply given its location between the South Downs National Park, the coast, and its tight border to the urban area. As such the Council was always likely struggle to meet its own needs. In such circumstances the Government is clear that it is essential for the Council and their neighbours work together to ensure that any unmet development needs are addressed elsewhere. However, as the



Council note in paragraph 3.28 of the Local Plan, they have not been able to secure additional delivery to address their unmet needs in full. This is disappointing and suggests that co-operation has not been effective in achieving this principle objective and there remains a reluctance amongst authorities in the wider sub-region to support their more constrained neighbours.

5. We recognise that the Council cannot force another authority to address their unmet needs, however it is essential that the Council makes a clear statement in policy as to the level of unmet housing needs in Worthing and that it will expect to have these needs met in other neighbouring housing market areas as Councils in those areas progress with any new local plans. Such a statement in either policy SS1 or SS2 will provide clarity across the sub-region as to the level of unmet needs and ensure the Council can challenge less constrained areas to address Worthing's unmet needs.
6. In addition to working with neighbouring areas the Council must also seek to maximise opportunities for development wherever possible in Worthing. With regard to whether there are further sites in Worthing that could be allocated to meet needs the HBF is not in a position to comment. However, we do have general concerns as to whether the Council has reconsidered its position on rejected sites relative to paragraph 11 of the National Planning Policy Framework (NPPF). The approach taken by the Council in considering sites is based on the methodology set out in paragraphs 3-005 to 3-0026 of Planning Practice Guidance (PPG). However, we are concerned that insufficient consideration has been given to the benefits of allocating rejected sites against the adverse impacts given that there is such a significant gap between housing needs and supply and no other authority is willing to help. The Council must be able to show that it has considered in detail whether any identified constraints on, or negative impacts arising from, development on rejected sites could be mitigated and consequently whether the adverse impacts of development would significantly and demonstrably outweigh the benefits.
7. For example, we would suggest that any sites rejected within identified green gaps should be reconsidered for allocation. This is a locally applied designation and as such should not be a significant factor as to whether a site should be allocated for development. We are concerned that the Council has taken a '*policy on*' position with regard to local green gaps when assessing appropriateness of a site for development and that such sites have been rejected without sufficient consideration as to the benefits of their allocation given the Council's inability to meet needs.
8. In making such considerations the Council must recognise the benefits of residential development at a national level this can be seen in our report Building Communities which was published last in 2020. This research shows, for example, that in 2018/19 the private sector house building industry provided over £7 billion in contributions for affordable housing and over £200 million to improving and expanding educational provision. The local benefits of each new house can also

been seen in the Housing Calculator developed from research commissioned by the HBF on the Economic Footprint of House Building. This research estimates that for every additional house built the benefits for the local community include creation of 3 jobs (direct & indirect employment), average financial contributions of £27,754 towards affordable housing, £806 towards education, £297 towards open space / leisure, £1,129 extra in Council tax and £26,339 spent in local shops.

9. However, rather than considering how such areas could be developed sensitively the Council has instead looked to place further constraints on development in these locations by designating them as Local Green Space (LGS) – a designation, as set out below, we consider to be unsound. Given the constraints faced by the Council it seems contradictory that they should seek to further constrain opportunities for development rather than consider how it can mitigate any negative impacts and recognise the benefits of further housing development.
10. Finally, the Council will need to identify, as required by paragraph 68(a) of the NPPF, sufficient sites of less than one hectare in its allocations or on its brownfield register to meet at least 10% of its housing requirement. We could not find any evidence presented by the Council on this matter. If the Council cannot meet this requirement it will need to provide strong reasons as to why this cannot be achieved.

Recommendation

11. The Council should:
 - amend policy SS1 to include the following: *“The Council’s constrained housing target will leave 10,488 homes to be delivered in neighbouring authorities and housing market areas. The Council will continue to work with and challenge local planning authorities in those areas to ensure needs are met in their local plans as these are progressed.”*;
 - revisit those sites that have been rejected and consider whether any adverse impacts of development on those sites could be mitigated and if these impacts significantly and demonstrably outweigh the benefits of development; and
 - Identify 10% of its housing requirement on sites of less than one hectare or provide strong reason as to why this cannot be achieved.

SS5 – Local Green Gaps

The policy is not sound as it is not positively prepared.

12. As outlined above we are concerned that the Council has identified local green gaps despite the fact that there is a significant shortfall between housing supply and housing needs in Worthing. Whilst we recognise that green gaps can play an important role in local plans this should only be a consideration where development needs are met and not be used in the same manner as a Green Belt

when considering development opportunities. The Council are constraining themselves unnecessarily by this designation and as such it should be deleted.

SS6 - Local Green Space

This policy is unsound as it is inconsistent with national policy and guidance.

13. Given the constrained nature of Worthing and the level of unmet needs in the Borough it seems contradictory that they should then seek to limit potential development opportunities even further by designating the green gaps identified in policy SS5 as Local Green Space (LGS). This designation will mean that those sites will be treated within decision making as Green Belt preventing any future development and as such requiring very special circumstances to be proven if these sites are to be developed in future. However, we do not consider the Council's decision to designate the local green gaps as LGS to be consistent with national policy.
14. In designating LGS, it is important to ensure that they conform the paragraphs 99 and 100 of the NPPF. Firstly, paragraph 99 indicates that the designation of LGS should "...complement *investment in sufficient homes, jobs and other essential services*" and be "... *capable of enduring beyond the plan period*". This position is further emphasised in paragraph 37-007 of 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."

15. Given that the Council is over 10,000 homes short of meeting housing needs we would suggest that the designation of these large areas of land within the Borough as local green space is not complementing the delivery of sufficient homes nor are they capable of enduring beyond the plan period given the other geographical and policy constraints facing the Borough.
16. Secondly, the NPPF is clear in paragraph 100 that any LGS should not be an "*extensive tract of land*". However, each of the areas designated in this policy is circa 30ha and as such must be considered to be extensive tracts of land. LGS should be used to ensure important local spaces are protected rather than create additional designations to limit a Council's ability to meet its housing needs. As the Government note in paragraph 37-015:

"... 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."

17. The HBF therefore consider the designation of the land identified in SS6 as LGS to be inconsistent with national policy and as such it should be deleted.

DM2 – Density

Part d of DM2 is unsound as it has not been justified.

18. Footnote 46 to paragraph 127 of the NPPF requires the Council to have evidence that the optional standard such as the Nationally Described Space Standards (NDSS) are needed if they are to be adopted in the local plan. The Council therefore need robust justifiable evidence to introduce any of the optional housing standards, based on the criteria set out above. However, we could not find any evidence to support the adoption of these standards in the local plan. The Council refer to evidence in the Housing Implementation Strategy, but this does not provide any further evidence as to why this policy is needed. Therefore, whilst the Council has considered the impact of these standards on viability they cannot be adopted if there is no evidence to suggest that they are needed. Without this evidence the policy must be deleted.

DM15 – Sustainable and Active Travel

Part iv of this policy is not legally compliant and is not sound as it has not been justified.

19. Part iv) of this policy requires development to accord with the levels of parking for cycles, cars and electric vehicles in the guidance published by West Sussex County Council. Firstly, the Council cannot set policy outside of the local plan and as such it cannot require development to accord with guidance. The relevant legislation defining Local Plans and SPDs and their status as policy documents is the Town and Country Planning Regulations (2012). In particular regulation 5(1)(a)(iv) defines a local development document as being one in which includes: *“development management and site allocation policies, which are intended to guide the determination of applications for planning permission”*. We would therefore suggest that if the Council wishes to set a standard with regard to parking, then this must be set out in the local plan to ensure that any changes to these standards are considered through the proper process of consultation and examination. If the Council wishes to refer to the County’s guidance, then it should be clear that development will need to take account of this guidance but not that it must accord with it.
20. Secondly, if the Council requires development to meet the standards set out in the County’s guidance it will be important that full and proper consideration is given in the viability assessment as to the impact of requiring electric vehicle charging points (EVCP).
21. The Council’s policy approach should not compromise the viability of development. However, we note that the cost of EVCPs do not seem to have been

included in the Council's latest viability assessment. The evidence supporting the Government's latest consultation estimated an installation cost of approximately £976 per EVCP. Whilst this in itself is not seem a significant amount it is important that the inclusion of this in the cumulative costs given marginal viability of some development in Worthing. However, the HBF and its Members also have serious concerns about the capacity of the existing electrical network in the UK. The supply from the power grid is already constrained in many areas across the country. Major network reinforcement will be required across the power network to facilitate the introduction of EVCPs and the move from gas to electric heating as proposed under the Future Homes Standard.

22. These costs can be substantial and can drastically affect the viability of developments. If developers are funding the potential future reinforcement of the National Grid network at significant cost, this will have a significant impact on their businesses and potentially jeopardise future housing delivery. The Government's current proposal automatically levies a capped figure of £3,600 per charge point on developers for upgrading local electricity networks, therefore this figure should also be included in the Council's viability assessment.

DM16 – Sustainable design

The policy is unsound as it duplicates national policy contrary to paragraph 16 of the NPPF.

23. The HBF supports a clearly defined national approach to improving the energy efficiency of new homes. Such an approach allows not only house builders but those industries supporting it to develop the necessary supply chains that will ensure these standards are met whilst maintaining the delivery of new homes. As such we are broadly supportive of the Government's phased approach to this matter. We also recognise that the Government in their recent feedback on the responses to the consultation on the Future Homes Standard¹ will continue to allow Councils to set higher standards in their local plans. However, this should be seen within the context of the higher standards that the Government are proposing to be introduced from the start of 2022 and the statement in paragraph 2.41 of their response to the consultation on the Future Homes Standard that these standards will mean it is "*less likely that local authorities will need to set local energy efficiency standards*". It is also important to note that Planning Practice Guidance (PPG) states in paragraph 6-012, reflecting guidance in the 2015 Written Ministerial Statement, that energy standards should not be set at a standard above what would be the equivalent of level 4 of the Code for Sustainable Homes – roughly a 20% improvement in emissions on current building regulation.
24. This suggests that the proposed changes to the part L, which will see a 31% improvement in emissions, is the appropriate standard to be applied from 2022

¹http://www.hbf.co.uk/?eID=dam_frontend_push&docID=25453&filename=HBF_SME_Report_2017_Web.pdf

and that further local uplifts are unnecessary. Importantly the approach taken by Government is one that ensures there is sufficient time for the development industry and relevant supply chains to deliver the Future Homes Standard from 2025. The Council must recognise that this not just an issue of viability but also one of deliverability and that, as the Government notes in paragraph 2.53 of their consultation response, the interim part L standards are a key stepping stone to implementing the higher standards from 2025.

25. The HBF considers the most effective approach in achieving net zero commitments alongside delivering the homes needed in any area is through the application of Building Regulations that allow for a transition to higher standards. The importance of a collective approach will also balance the cost of delivering the energy efficiency improvements required alongside other planning obligations and development aspirations that the Council are seeking to deliver through the Worthing Local Plan. We would therefore suggest that reference to the 31% improvement above the 2013 edition of Part L of the Building Regulations is deleted from DM16.

DM17 – Energy

Policy is unsound as it is ineffective.

26. Part c of this policy will require all major development to connect to district heating networks or maximise opportunities for the development of future district heating networks. However, we are concerned that the Council are potentially promoting connection to communal heating networks that are gas combined heat and power plants. To meet the Government's legal commitment on reducing greenhouse gas emissions virtually all heat in buildings will require decarbonising. Heat networks are one aspect of the path towards decarbonising heat, however currently the predominant technology for district-sized communal heating networks is gas combined heat and power (CHP) plants. Over 90% of district networks are gas fired. As 2050 approaches, meeting the Government's climate target of reducing greenhouse gas emissions to net zero will require a transition from gas-fired networks to renewable or low carbon alternatives such as large heat pumps, hydrogen or waste-heat recovery but at the moment one of the major reasons why heat network projects do not install such technologies is because of the up-front capital cost. The Council should be aware that for the foreseeable future it will remain uneconomic for most heat networks to install low-carbon technologies.
27. Furthermore, some heat network consumers do not have comparable levels of satisfaction as consumers on gas and electricity networks, and they pay a higher price. Currently, there are no sector specific protections for heat network consumers, unlike for people on other utilities such as gas, electricity, or water. A consumer living in a building serviced by a heat network does not have the same opportunities to switch supplier as they would for most gas and electricity supplies. All heat network domestic consumers should have ready access to information

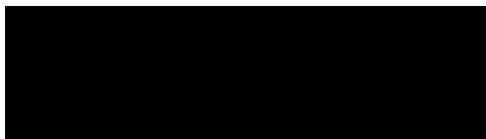
about their heat network, a good quality of service, fair and transparently priced heating and a redress option should things go wrong.

28. Research by the Competition and Markets Authority (CMA) found that a significant proportion of suppliers and managing agents do not provide pre-transaction documents, or what is provided contains limited information, particularly on the on-going costs of heat networks and poor transparency regarding heating bills, including their calculation, limits consumers' ability to challenge their heat suppliers reinforcing a perception that prices are unjustified. The monopolistic nature of heat networks means has led to the CMA concluding that "*a statutory framework should be set up that underpins the regulation of all heat networks.*" They recommended that "*the regulatory framework should be designed to ensure that all heat network customers are adequately protected. At a minimum, they should be given a comparable level of protection to gas and electricity in the regulated energy sector.*" The Government's latest consultation on heating networks proposes a regulatory framework that would give Ofgem oversight and enforcement powers across quality of service but prior to such regulations coming into force the Council should not be seeking to reduce consumer choice with regard to how their homes are heated.

Conclusion

29. 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, for the following reasons:
- The plan does not specify in policy the level of unmet needs to addressed in neighbouring areas;
 - Failure to reconsider rejected sites and the relative benefits of allocation against adverse impacts;
 - The designation of sites for local green space that is inconsistent with national policy; and
 - Repeating national policy in relation to energy efficiency improvements; and
 - Requiring connection to combined heat a power that would reduce consumer choice.

Yours faithfully



Mark Behrendt MRTPI
Planning Manager – Local Plans
Home Builders Federation
Email: mark.behrendt@hbf.co.uk
Tel: 07867415547



Adur & Worthing Councils,
Planning Policy,
Worthing Town Hall,
Chapel Road, Worthing,
West Sussex BN11 1HA

Our ref: PL00736542
Your ref:
Telephone 020 7973 3700
Email e-seast@historicengland.org.uk
Date 22 March 2021

By email only to planning.policy@adur-worthing.gov.uk

Dear Sir or Madam

Worthing Local Plan Regulation 19 Consultation

Thank you for your email of 26 January 2021 inviting comments on the above consultation 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 of the planning process. This includes formulation of local development policy and plans, supplementary planning documents, area and site proposals, and the on-going review of policies and plans.

There are many issues and matters in the consultation document that are beyond the remit and concern of Historic England and our comments are, as required, limited to matters relating to the historic environment and heritage assets. In our comments previously (by letter dated 10 December 2018), Historic England focused on the objective of the National Planning Policy Framework to set out a positive strategy for the conservation, enjoyment and enhancement of the historic environment (NPPF, Paragraph 28); and contain policies to deliver the conservation and enhancement of the historic environment (NPPF, Paragraph 185).

Our comments on the Regulation 18 stage draft Local Plan largely have been addressed in the current Publication version or are, in our view, not now likely to affect the soundness of the Local Plan.

We welcome the inclusion of policies for the historic environment in the local plan that meet the obligation for preparing the positive strategy required by the NPPF. The key test of the soundness of the plan and the achievement of sustainable development as defined in the NPPF in respect of the elements that relate to the historic environment, in our view, have been met.



Historic England, 4th Floor, The Atrium, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3700 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

We should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals which may subsequently arise where we consider that these would have an adverse effect upon the historic environment. We hope that these comments are useful.

Yours sincerely

Alan Byrne

Historic Environment Planning Adviser



Historic England, 4th Floor, The Atrium, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 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.



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

Our ref:
Your ref:

Date: 22 March 2021

Dear Ian Moody,

Worthing Draft Local Plan 2020-2036 – Submission Draft Local Plan (Regulation 19) and Duty to Co-operate

Horsham District Council (HDC) welcomes the opportunity to comment on the Regulation 19 Submission Draft Worthing Local Plan. We also acknowledge the letter from James Appleton dated 29 January 2021, regarding the Duty to Co-operate and, specifically, the formal written request within that letter for Horsham District to consider meeting some of Worthing's unmet housing need. Our comments as set out below are submitted as both our formal representations on the Worthing Local Plan (Regulation 19) and as a response to James Appleton's letter. The specific comments that constitute our formal representations on the Local Plan are clearly identified and it is those that we would expect to be recorded in your record of representations to your Regulation 19 Local Plan.

HDC recognises that your authority faces considerable challenges in ensuring it can meet the future needs of Worthing within what is a tightly constrained and predominantly built-up administrative area. Overall we consider that the plan has positively sought to balance the provision of those future needs with other wider objectives in a manner that contributes to achieving sustainable development. Whilst some comments below are technically required to be recorded as not achieving the NPPF test of soundness 'justified', we consider that these may be resolvable through further work on the evidence base and any updated position can be recorded in a bilateral Statement of Common Ground (SoCG) to be produced and signed ahead of your Plan's submission.

I would also take the opportunity to reaffirm Horsham District Council's commitment to continued close cooperation and joint working between our councils, both on a bilateral basis and as part of the preparation of the West Sussex and Greater Brighton Local Strategic Statement 3 (LSS3).

Paragraph 1.20: The Duty to Cooperate		
Paragraph 3.28: Duty to Cooperate		
Legally compliant - Yes	Sound – (position reserved)	Complies with DtC - Yes

The following representation also constitutes the formal response of Horsham District Council to the letter from James Appleton to Barbara Childs dated 29 January 2021, concerning the Duty to Co-operate.

Details:

HDC is committed to working with Worthing Borough Council (WBC) on strategic cross-boundary matters, and has met regularly with WBC officers to consider the challenges that we share and the means of addressing those challenges. We confirm engagement with WBC with

regards the preparation of a bilateral Statement of Common Ground (SoCG). We also confirm support for the joint preparation of a Local Strategic Statement 3 (LSS3). We consider that the legal test of Duty to Co-operate compliance has been met.

In WBC's letter of 29 Jan 2021, it is explained that WBC is working hard to maximise the supply of housing within its own boundary. Our formal views on this matter, insofar as they relate to the draft policies in your Regulation 19 Local Plan, are set out in our responses to specific policies below. In summary, it is recognised that WBC is taking a positive approach to development, and acknowledged that, despite this, there will be a significant shortfall of housing supply (proposed to be 230 dwellings per annum) compared with the identified local housing need of 885 dwellings per annum. However at the current time, HDC considers that the precise level of shortfall is still open to question, given the unresolved concerns over evidence that we have set out in our responses to your policies. In addition, it is unclear from your letter what proportion, if any, you are requesting from this authority. We would therefore welcome further discussions with you so that we may have both clarification on the level of provision being requested and an explanation of any such request.

Whilst we note WBC's formal request for HDC to consider its ability to meet any of Worthing's unmet housing need, HDC's primary responsibility is to meet its own assessed local housing need which is currently 920 dpa. Secondly, as the whole of Horsham District falls within the Northern West Sussex Housing Market Area (NWS HMA), our approach to Duty to Cooperate requests is to consider how and whether we may address the unmet needs from within the NWS HMA as our next priority. As with Worthing, Crawley, which falls within the NWS HMA, is a constrained built-up borough that is unable to meet its full local housing need – the Draft Crawley Local Plan indicates a residual unmet need of 6,680 dwellings over its 16-year Plan period. Whilst the precise contribution necessary within Horsham towards this is not yet fully determined, it is likely to be greater than the current provision of 150dpa which Horsham is providing through our current adopted Local Plan, in order to help meet Crawley's unmet needs.

The third point to draw attention to is the constraint posed on housing delivery in Horsham by the housing market. We have previously shared with you and other partners that HDC commissioned Icen Projects Ltd to undertake a Housing Delivery Study (which will be published alongside the Regulation 19 Horsham District Local Plan in a few weeks' time). This will provide a steer on the limits housing market geographies and developer practices are likely to have on overall levels of development that can practicably be accommodated in the district. A related further constraint is the finite capacity of our District's infrastructure (we face particular challenges regarding transport network capacities, schools capacity and sewerage). You will appreciate that the Horsham housing need, when added to a share of the Crawley unmet need, already results in an annual supply number that is well in excess of historic levels of delivery within our District.

The fourth consideration is the functional relationship between our respective areas, when compared with other areas that are fully within the Sussex Coast HMA. We are particularly mindful that Worthing directly neighbours Arun District, where there is a direct functional and geographical relationship between the two authority areas. We are also aware that Arun District is also less constrained than many other authorities within the Sussex Coast HMA. It is however recognised that there are likely to be significant challenges for any authority in meeting unmet needs of other areas, given the high housing targets for each individual authority. Given the local geographies set out above, HDC is nevertheless of the view that in the context of sustainable development, it would be logical for Worthing Borough to establish whether there is any potential for Arun District Council to accommodate a portion of your unmet needs.

The fifth and final point is to also highlight the environmental and amenity constraints in Horsham District. Whilst 'hard' environmental constraints in the District not as extensive as in

some neighbouring areas, there is a need to consider wider landscape integrity, the character of our countryside and settlements, and ecosystem services. In the context of meeting unmet needs from Worthing, the southern portion of our District, would in geographic terms be the most logical location to accommodate additional growth. However this is the part of our District with the most environmental constraints. The southernmost section of HDC is within the South Downs National Park, and we are not the planning authority for this area. The settlements which adjoin or are located close to the National Park have a number of other constraints including areas which are located in flood zones 2 and 3 of the Arun and Adur rivers. This places a physical limitation on the land that is available for development in a location that could potentially be argued to serve the needs of Worthing's residents.

We attach an Appendix to this letter which further summarises the key constraints faced in Horsham District.

To conclude on these matters, HDC confirms that it will consider the considerable unmet housing needs identified in the wider Sussex Coast HMA, including Worthing, in taking forward its Local Plan. However its ability to assist in this respect is dependent on the final position on meeting our own housing needs, addressing unmet housing needs from Crawley, and concluding our evidence base on the capacity of Horsham District to accommodate further development over its Plan period, together with any further information from you about the level of growth that we may be expected to accommodate to meet your needs.

We look forward to preparing and agreeing a Statement of Common Ground with WBC to further address these matters.

Changes required:

Preparation of a Statement of Common Ground to evidence the Duty to Cooperate work between our authorities and establish (and ideally agree) respective positions. See also *changes required* for Policy SS2 and Policy DM2.

Policy SS2: Site Allocations		
Legally compliant - Yes	Sound – No (not justified)	Complies with DtC - Yes

Details:

HDC recognises that Worthing Borough is not in a position to meet its entire identified local housing need of 885 dwellings per annum, given the clearly evidenced constraints. HDC also recognises that since preparation of the Regulation 18 Local Plan, work on assessing sites with potential for allocation has progressed, allowing the proposed allocation of two further sites previously categorised as 'omission sites' and a positive approach in principle to achieving higher site densities. HDC acknowledges and welcomes that significant effort has been put into identifying development capacity in a way that reflects the principle of positive planning. Nevertheless, the NPPF and PPG set a high bar for 'leaving no stone unturned' in respect of meeting development needs. In our response to the Regulation 18 document, we expressed our significant concern that the new housing target being proposed by Worthing is substantially below the standard methodology housing target, given the likelihood that Worthing Borough Council would look to neighbouring local authorities to help meet residual unmet development needs.

HDC has considered evidence supporting site allocations and has identified a need for further justification with respect to assessed site capacities for residential uses. For example, certain

sites proposed for allocation have planning permission for a quantum of residential units that is higher than the number proposed in the relevant allocation policy. An example is the large site at Teville Gate (SHLAA ref. WB08039) which is noted in the SHLAA as having planning permission for 378 units, whereas the proposed number to be allocated is 250 (Policy A12). It is not as yet clear from the SHLAA or Topic Papers why there is a difference on some permitted sites being proposed. There are further sites, for example Upper Brighton Road (SHLAA ref. WB08163) where the assessed capacity appears low compared with the size of the site (in this case 123 units on a 7.5 ha. site). In addition, it is questioned whether the allocation of 10,000 sqm of space for employment uses on the Centenary House site (5,000 sqm of which appears to be of a speculative nature) is justified given the alternative of providing a greater number of residential units instead.

Changes required:

We would ask that full and transparent justification is given as to the number of residential units on certain sites being below the number that is theoretically achievable. Alternatively, consideration should be given to revising the assessed capacities. Any review of capacities should also be informed by the as-yet incomplete work to evidence density policies, as referred to in paragraphs 6.21 and 6.22 of the Draft Housing Implementation Strategy (Topic Paper 1).

Policy DM2: Density		
Legally compliant - Yes	Sound – No (not justified)	Complies with DtC - Yes

Details:

HDC in principle welcomes the commitment in this policy and its supporting text to maximising densities as appropriate to context. It is helpful that the policy indicates minimum densities of 35 dwellings per hectare (dph) and 100 dph, for family housing and mixed-use/flatted/town centre housing respectively. It is also welcomed that paragraphs 5.28 to 5.30 in particular highlight the positive aspects of higher density development.

That said, we consider there remains a significant gap in the evidence, without which there is reason to question whether this policy has gone as far as it can in respect of setting parameters for densities appropriate to an urban area with good sustainable travel opportunities. In our representations at Regulation 18 stage, HDC noted that we were 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. Given the need to 'leave no stone unturned', and the implications of unmet development needs in Worthing on other nearby authorities, we maintain our challenge that there still appears to be no report of this nature in the published evidence base.

The draft Housing Implementation Housing Strategy (Topic Paper 1) outlines in paragraphs 6.21 and 6.22 that work is currently progressing to further inform refinements to density policies, with a view to further increasing residential densities whilst ensuring high standards of place and amenity. This is welcomed, but at the same time it is of concern that the evidence is not available at the time of the Regulation 19 consultation.

Changes required:

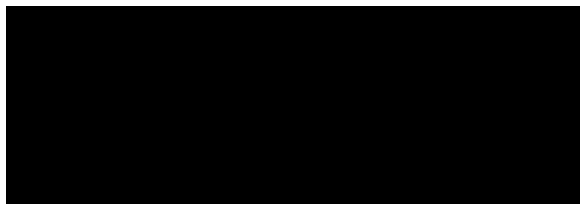
We would ask that evidence is provided to support Policy DM2: Density. We would expect this in turn to feed into a reassessment of the overall capacity of Worthing Borough to accommodate a higher level of residential development. Given the evidence referred to is in preparation but won't be available until after the Regulation 19 consultation closes, we would expect a

forthcoming Statement of Common Ground (SoCG) between WBC and HDC to address these points and provide HDC with the opportunity for further formal input in light of the evidence.

I do hope these comments are helpful. I would again emphasise that they are made in anticipation of further constructive dialogue between our authorities, and with an expectation that areas of disagreement can be readily addressed, and quite possibly eliminated.

My officers and I look forward to further discussions around this point and in respect of the Statement of Common Ground.

Yours sincerely



Councillor Claire Vickers
Cabinet Member for Planning and Development

Cc Barbara Childs – Director of Place
Catherine Howe – Head of Strategic Planning

Appendix:**Summary of constraints affecting capacity for development in Horsham District**

Constraint	Details	Action / evidence
Landscape capacity	Horsham district has two areas of nationally designated landscape protection: the South Downs National Park to the south (14.3% of the District – HDC is not the planning authority), and the High Weald AONB to the north-east (7% of the District). Much of the rest of the district enjoys very good quality landscape, which is highly valued by local communities, and provides many opportunities for informal recreation for surrounding areas, including Crawley.	HDC is currently reviewing its Landscape Capacity Study. Final site assessments relating to prospective new site allocations will take account of this evidence, and seek to avoid areas of low/no capacity for development.
Environmental constraints	Much of the landscape of the District is still heavily wooded of which over 6% is classified as ancient woodland. Approximately 8% of the land is designated for its importance in nature conservation terms, including the Arun Valley Special Protection Area and the Mens Woodland SAC, which are of international importance. The Mens Woodland SAC has a secondary area of constraint relating to the protection of bats which forage beyond the Internationally-designated site. 6% of the district is located within functional floodplain, with large expanses of floodplain in the south of the District. Much of the district whilst not subject to any environmental constraint is very rural in character with its natural fluvial and surface water management role. The Knepp Estate in the centre of the District is a nationally recognised area of importance for rewilding and is now of significant importance for a range of biodiversity.	These environmental constraints are inherent constraints. Opportunities for mitigation will be tested through the Local Plan review, by way of the Habitats Regulation Assessment process and the Sustainability Appraisal.
Pressure on infrastructure	There is justifiable concern within HDC and across communities that the scale and pace of development in Horsham district will lead to failure of infrastructure to cope. There are particular concerns for the combined impact that large scale new development will have on the transport networks. Education provision is also at capacity in some areas of the district. Significant new development will require new infrastructure to be provided potentially including new sewage works.	HDC is preparing a new Infrastructure Delivery Plan (IDP) to identify where the significant gaps are likely to occur, and how these might be addressed. HDC is also preparing a comprehensive Horsham District Transport Study, focusing on the road network, which includes a strategic model to assess likely impacts

	Larger pieces of infrastructure provision may delay the level of development that can be supported until they are in place.	of growth scenarios and identify appropriate mitigation. A Water Cycle Study is also being prepared jointly with other authorities including Crawley BC and Mid Sussex DC.
Market absorption of scale of growth	The level of growth necessary to go above and beyond the minimum Local Housing Need is unprecedented. We are aware that delivery rates are an area of scrutiny at Local Plan Examinations and have to be clearly demonstrable. The ability of the market to deliver enough homes annually may stymie the growth levels required for meeting additional need from neighbouring areas.	HDC has commissioned Icen Projects Ltd to undertake a Housing Delivery Study. This will provide a steer on the limits housing market geographies and developer practices will have on overall levels of development in the district.

RE: Submission Draft Worthing Local Plan Consultation (January 2021)

1 message

SM-MMO-Consultations (MMO) <Consultations.MMO@marinemanagement.org.uk>

22 March 2021 at 14:04

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

Dear Planning team,

Hopefully you received the MMO's standard response for this consultation. If you did not, please see below. I don't believe any further comment is required from the MMO regarding this as there is a clear understanding of the South Marine Plan, the subsequent policies (in a whole plan approach), the mitigation hierarchy and how the terrestrial and marine environments overlap within the intertidal area.

Consultation response - PLEASE READ

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

Marine Management Organisation Functions

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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 grants.

Marine Planning

Under delegation from the Secretary of State for Environment, Food and Rural Affairs (the marine planning authority) 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. To work together in this overlap, the Department of Environment, Food and Rural Affairs (DEFRA) created the Coastal Concordat. This is a framework enabling decision-makers to co-ordinate processes for coastal development consents. It is designed to streamline the process where multiple consents are required from numerous decision-makers, thereby saving time and resources. DEFRA are encouraging coastal authorities to sign up as it provides a road map to simplify the process of consenting a development which may require both a terrestrial planning consent and a marine licence. Furthermore, marine plans inform and guide decision-makers on development in marine and coastal areas.

Local authorities developing planning documents for areas with a coastal influence must have regard to relevant marine plans and may wish to make reference to the MMO's licensing requirements to ensure that necessary regulations are adhered to. We advise that our marine plan policies are taken into consideration, as they can be useful for authorities when making key decisions. It is important to note that our policies do not work in isolation, and decision-makers should consider a whole-plan approach. 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](#).

See [this map on our website to locate](#) the six marine plan areas in England. For further information on how to apply the marine plans and the subsequent policies please visit our [Explore Marine Plans](#) service.

[The East Inshore and Offshore marine plans](#) were adopted on the 2nd April 2014, becoming a statutory 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.

[The South Inshore and Offshore marine plans](#) were adopted on the 17th July 2018, becoming a statutory 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.

The [draft North East Inshore and Offshore marine plans](#) were published on the 14th January 2020 becoming a material consideration for public authorities with decision-making functions. The North East Inshore and Offshore marine plans cover the coast and seas from Flamborough Head to the Scottish border. Consultation closed on 20th April 2020. This was the final stage of statutory public consultation before the marine plans are submitted to the Secretary of State for consideration for adoption.

The [draft North West Inshore and Offshore marine plans](#) were published on the 14th January 2020 becoming a material consideration for public authorities with decision-making functions. The North West Inshore and Offshore marine plans cover the coast and seas from the Solway Firth border with Scotland to the River Dee border with Wales. Consultation closed on 20th April 2020. This was the final stage of statutory public consultation before the marine plans are submitted to the Secretary of State for consideration for adoption.

The [draft South East Inshore marine plan](#) was published on the 14th January 2020 becoming a material consideration for public authorities with decision-making functions. The South East Marine plan covers the coast and seas from Felixstowe in Suffolk to near Folkestone in Kent. Consultation

closed on 20th April 2020. This was the final stage of statutory public consultation before the marine plan is submitted to the Secretary of State for consideration for adoption.

The [draft South West Inshore and Offshore marine plans](#) were published on the 14th January 2020 becoming a material for consideration for public authorities with decision making functions. The South West Inshore and Offshore marine plans cover the coast and seas from the River Severn border with Wales to the River Dart in Devon. Consultation closed on 20th April 2020. This was the final stage of statutory public consultation before the marine plans are submitted to the Secretary of State for consideration for adoption.

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 would affect a marine protected species.

Minerals and waste local plans and local aggregate assessments

If you are consulting on a minerals and waste local plan or local aggregate assessment the MMO recommends reference to marine aggregates, and to the documents below, be included:

- 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 must 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.

Best wishes,

Lauren

Lauren James

Marine Planner (South) | Marine Management Organisation

✉ lauren.james@marinemanagement.org.uk | 📱 07789 932734 | ☎ 02080262031

From: tracy.wigzell@adur-worthing.gov.uk <tracy.wigzell@adur-worthing.gov.uk> **On Behalf Of** Planning Policy

Sent: 26 January 2021 12:11

Subject: Submission Draft Worthing Local Plan Consultation (January 2021)

Dear Consultee

Please find attached a letter informing you of the Submission Draft Worthing Local Plan Regulation 19 consultation.

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Planning Policy Team

Adur and Worthing Councils

This message has been sent using TLS 1.2 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.

Office use Only	
Comment number	SDWLP-50
Date received	

Submission Draft Worthing Local Plan January 2021

Regulation 19 (Publication Stage) Comments Form

This consultation runs from Tues 26th Jan to Tues 23rd March 2021

How to submit your comments

This response form has two parts:

- Part A: Personal Details
- Part B: Your representation(s)

Both Part A and Part B of the form need to be completed in order for your representation(s) to be valid. Please fill in a separate sheet for each representation (Part B) you wish to make. You do not need to fill out Part A for each representation provided that all representations made are securely attached.

Forms must be returned by the latest
5pm Tuesday 23rd March 2021

You can complete this form on-line: www.adur-worthing.gov.uk/worthing-local-plan

Or return a hard copy of the form:

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

Or by e-mail to: planning.policy@adur-worthing.gov.uk

Further guidance

The Local Plan, the evidence base and all supporting documents are published on the Council's website (see link above). This includes a Guidance Note on how to make effective representations and you are advised to read this before making any comments. At this stage (Regulation 19) comments should only relate to whether you consider the Plan complies with legal requirements, including the duty to cooperate, and whether the document is sound.

If you require any advice on completing this form please feel free to contact the Planning Policy Team via email (as above) or telephone on 01273 263000.

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

Part A - Contact Details			
First name	Anna		
Last name	Russell-Smith		
Organisation	Montagu Evans LLP		
Address line	70 St Mary Axe, London		
Address line 2			
Town			
Postcode	EX3A 8BE	Telephone	02073127498
Email	Anna.russell-smith@montagu-evans.co.uk		

Signed	Montagu Evans LLP	Date	22/03/2021
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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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<u>Use of information</u>
<p>All data will be stored securely in line with the GDPR. 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. We cannot accept or report confidential or anonymous responses. Further information about how personal information is processed can be found in the Planning Policy Privacy Notice:</p> <p>https://www.adur-worthing.gov.uk/planning-policy/privacy-notice/</p>

Part B

Please use a separate sheet for each representation

To which part of the Submission Draft Local Plan does this representation relate?

Policy

A11

Paragraph

Map
Extract

Do you consider the Submission Draft Local Plan:

Legally compliant?

Yes

No

Don't know

Sound?

Yes

No

Don't know

**Complies with the Duty to
Cooperate?**

Yes

No

Don't know

Please give details of why you consider the Submission Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Submission Draft Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Please see attached letter dated 22 March 2021

(continue on a separate sheet/expand box if necessary)

Please set out what modification(s) you consider necessary to make the Submission Draft Local Plan legally compliant or sound, having regard to the matter you have identified above where this relates to soundness. You will need to say why this modification will make the Submission Draft Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see attached letter dated 22 March 2021

(continue on a separate sheet/expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes

☐

NO

☐

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We reserve the right to speak at the examination on the basis of the submission version issued to the Inspector.

Please note: *The inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

Signature:

Montagu Evans LLP

Date:

22/03/2021

Ref: SDWLP-50



PD12697/ARS/OP

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Planning Policy Team
Worthing Borough Council
Worthing Town Hall
Chapel Road
Worthing
West Sussex
BN11 1HA

By email only to: planning.policy@adur-worthing.gov.uk

22 March 2021

Dear Sir or Madam,

**WORTHING NEW LOCAL PLAN – SUBMISSION DRAFT WORTHING LOCAL PLAN (JANUARY 2021)
REGULATION 19 PUBLICATION STAGE
REPRESENTATIONS ON BEHALF OF STAGECOACH**

Introduction and Background

These representations are submitted by Montagu Evans LLP on behalf of Stagecoach South Limited in respect of the Worthing Borough Council's New Local Plan consultation (Regulation 19).

The Submission Draft Local Plan (Regulation 19) document sets the 'broad policy framework and long term spatial strategy to manage development, respond to climate change, promote regeneration, protect the environment, deliver infrastructure and support vibrant healthy communities' within the Borough up to 2036.

These representations are made and submitted within the context of Stagecoach's ownership of Stagecoach Bus Depot, ("Bus Depot" or "the Site"), located on Marine Parade, Worthing, BN11 3PT.

The Site is allocated as an *Area of Change* (Area of Change 2) within the adopted Core Strategy (April 2011). The Site is identified within the Draft Local Plan under Site Allocation A11: Stagecoach, Marine Parade which sets out an indicative site capacity of 60 residential units and 2,000 sqm of commercial floorspace. The draft policy goes on to state that any future development proposals will need to consider / meet a number of development requirements including:

- Provide a mixed use development of retail, residential and cultural areas that is sensitive to the surrounding conservation areas and helps to integrate the seafront and town centre;
- Complement the connectivity between the seafront and retail sector, the mixed use scenario will suit a combination of ground floor small scale retail use comprising of shops, cafes and cultural uses such as galleries which would support the area as a cultural quarter;
- Promote an attractive and accessible pedestrian link from Marine Parade to Warwick Street;
- Residential uses on the upper floors would help to support the area as a vibrant, inclusive and mixed area; and
- Development to be sensitive to the surrounding conservation areas and Grade II* listed building.

WWW.MONTAGU-EVANS.CO.UK

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Montagu Evans LLP is a limited liability partnership registered in England and Wales with registered number OC312072. Registered office 70 St Mary Axe, London, EC3A 8BE. A list of members' names is available at the above address.

The National Planning Policy Context

In preparing these representations significant weight has been given to national planning policy set by the National Planning Policy Framework (NPPF) (February 2019).

Paragraph 9 of the NPPF requires sustainable development objectives to be delivered through the preparation and implementation of plans. Paragraph 11 of the NPPF requires that during the plan-making process, plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change. Part b of paragraph 11 requires that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses.

Section 3 of the NPPF deals with plan-making specifically and identifies under Paragraph 15 that the planning system should be genuinely plan-led. Paragraph 16 requires plans to achieve the following:

- a) be prepared with the objective of contributing to the achievement of sustainable development;
- b) be prepared positively, in a way that is aspirational but deliverable;
- c) be shaped by early, proportionate and effective, engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- d) contain policies that are clearly written and unambiguous, so it is evidence how a decision maker should react to
- e) development proposals;
- f) be accessible through the use of digital tools to assist public involvement and policy presentation; and
- g) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area.

With regard to Strategic Policies, Paragraph 20 of the NPPF states that Strategic Policies should set an overall strategy for the pattern, scale and quality of development and make sufficient provision for housing, employment, retail, leisure and other commercial development, infrastructure for transport, community facilities and the conservation and enhancement of natural, built and historic environment.

Paragraph 23 goes on to identify Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies). This reflects Paragraph 15 of the NPPF which states that a framework for addressing housing needs should be provided through a genuinely plan-led system.

Turning to producing new Local Plans specifically, Paragraph 31 states that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. Local Plans should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirement (Paragraph 32).

Worthing's New Local Plan – Regulation 19 Publication Stage (January 2021)

In the context of the redevelopment potential for this site we set out below comments to relevant elements of the Publication Stage Draft Local Plan (January 2021) as published for consultation; identifying specific policies and where appropriate recommended changes that would help provide the level of certainty that would assist ensuring this potential is met.

Site Allocation A11 Stagecoach, Marine Parade

As set out in the Local Plan historically previous housing targets took account of the physical and environmental constraints faced by Worthing and therefore targets were strongly influenced by the capacity of the borough to accommodate new development. However, the NPPF now requires that local planning authorities meet their full housing need (market and affordable) in line with other policies within the Framework.

The Government published The New Standard Method, on the 16 December 2020, for assessing housing need for each local planning authority in the UK. In line with this methodology, draft Policy SS1 (Spatial Strategy) refers to the housing delivery target and the supporting text paragraph 3.13 states that the Council should deliver 14,160 dwellings over the Plan Period (2020 to 2036), equating to a minimum of 885 dwellings per annum. This is a significant increase in the context of the adopted Core Strategy (2011) which set a housing requirement per annum of 200 dwellings with the average annual delivery rate of 308 dwellings per annum delivered between 1 April 2006 and 31 March 2020, according to the Annual Monitoring Report 2019 / 2020.

The Borough is constrained by a number of constraints, which impact on the land available for the delivery of housing, including both the Sea and the South Downs National Park. This is reflected in Paragraph 3.18 on the draft Local Plan, which states that brownfield sites alone are not sufficient to meet the requirement to plan positively to meet housing needs. Policy SS2 states that a minimum of 3,672 dwellings (net) will be delivered in Worthing, with a significant contribution (1,753 dwellings) coming from a number of site allocations. The Council acknowledges that this number represents a delivery rate significantly below the housing need identified resulting in a shortfall of some 10,488 dwellings.

The Local Plan states that there is 'an aspiration to increase the amount of residential development' within Worthing Town Centre as this will 'help increase vitality, activity and footfall and enable regeneration. Increasing densities in sustainable locations, as part of well-designed schemes, will help ensure that the most efficient use of land is made'. This aligns with paragraph 85 of the NPPF which identifies the need for residential development and how it plays an important role in ensuring the vitality of centres and this use should be encouraged on appropriate sites.

NPPF paragraph 123 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', and therefore to ensure the delivery of housing is maximised across the Borough.

It is therefore proposed that the indicative capacity for the site is increased to a minimum of 93 units plus commercial floor space to ensure that this brownfield, sustainable, town centre site is optimised in line with national policy to ensure that housing targets are delivered which also responds to the sites constraints including both the adjacent Steyne Gardens and Warwick Gardens Conservation Area and the Grade II* listed Dome Cinema.

Delivery of Employment Floorspace

The emerging Local Plan allocation includes provision to deliver 2,000 sqm of commercial floor space. It is appreciated that a mixed use scheme would be wholly appropriate in this town centre location, however it is requested that the policy wording states up to 2000 sqm to reflect the range and needs of potential commercial uses that might be brought forward on the site.

Conclusion and Closing

The Site is a key brownfield, sustainable site within Worthing Town Centre and will go towards enabling the Council addressing their housing delivery shortfall. Therefore, the proposed site allocation should seek to maximise the delivery of development.

For the reasons outlined above we consider that the site allocation should be amended to reflect an increase in capacity of the site up to a minimum of 95 residential units and commercial floorspace.

Stagecoach intend to continue to engage with the Council throughout the preparation of the new Local Plan and therefore request that we are kept informed of any updates going forward and we would like to have the right to participate at the examination if necessary.

Please contact Anna Russell-Smith (020 7312 7498 / anna.russell-smith@montagu-evans.co.uk) or Olivia Powell (0734 1115 403 / olivia.powell@montagu-evans.co.uk) at this office if you have any queries or if you would like to discuss further.

Yours faithfully,

A handwritten signature in black ink that reads "Montagu Evans".

Montagu Evans LLP