

## Submission Draft Worthing Local Plan

### Comments relating to Allocation A9 - Lyndhurst Road

- A total of 46 representations were received in relation to this proposed allocation. Of these:
  - 2 representations were made in support - 1 from a local resident (SDWLP-10) and 1 from site promoter (SDWLP-49)
  - 44 representations objected to (or raised concerns about) the proposed development - see break down of concerns in table below (Representation SDWLP-81 included a petition containing 31 signatures).
  - The majority of objections only related to this particular development. Where additional comments were made on other parts of the Plan this is reported elsewhere.

Objectors		
<b>Individuals</b>	SDWLP- 05 / 11 / 12 / 13 / 14 / 22 / 23 / 25 / 26 / 28 / 29 / 31 / 32 / 35 / 36 / 37 / 38 / 74 / 75 / 76 / 77 / 78 / 79 / 80 / 81 / 82 / 83 / 84 / 85 / 86 / 87 / 88 / 89 / 90 / 91 / 92 / 93 / 94 / 95 / 96 / 97 / 102	
<b>Organisations</b>	SDWLP-57 Sussex Wildlife Trust SDWLP-67 The Labour Group	
<b>Number of respondents</b>	<b>Reference (SDWLP):</b>	<b>Comment</b>
<b>41</b>	05 / 12 / 13 / 14 / 22 / 23 / 25 / 26 / 28 / 29 / 31 / 32 / 35 / 36 / 37 / 38 / 57 / 74 / 75 / 76 / 77 / 78 / 79 / 80 / 81 / 82 / 83 / 84 / 85 / 86 / 87 / 88 / 89 / 90 / 91 / 92 / 93 / 94 / 95 / 96 / 97	The parking provision is not adequate (placing more pressure on CPZ)
<b>40</b>	05 / 11 / 12 / 13 / 14 / 23 / 25 / 26 / 28 / 29 / 31 / 32 / 35 / 36 / 37 / 38 / 74 / 75 / 76 / 77 / 78 / 79 / 80 / 81 / 82 / 83 / 84 / 85 / 86 / 87 / 88 / 89 / 90 / 91 / 92 / 93 / 94 / 95 / 96 / 97	The development will not meet the housing need of families (2 and 3 bed dwellings)

<b>39</b>	05 / 11 / 12 / 22 / 23 / 25 / 26 / 28 / 29 / 31 / 32 / 35 / 36 / 37 / 38 / 74 / 75 / 76 / 77 / 78 / 79 / 80 / 81 / 82 / 83 / 84 / 85 / 86 / 87 / 88 / 89 / 90 / 91 / 92 / 93 / 94 / 95 / 96 / 97	The development will have an adverse impact on traffic and add to congestion
<b>38</b>	05 / 11 / 12 / 13 / 14 / 23 / 25 / 26 / 28 / 29 / 31 / 32 / 36 / 37 / 67 / 74 / 75 / 76 / 77 / 79 / 80 / 81 / 82 / 83 / 84 / 85 / 86 / 87 / 88 / 89 / 90 / 91 / 92 / 93 / 94 / 95 / 96 / 97	A high density / high rise development will detract from the character of the surrounding area (including Conservation Areas)
<b>35</b>	05 / 11 / 22 / 25 / 26 / 28 / 29 / 31 / 32 / 35 / 36 / 37 / 74 / 75 / 76 / 77 / 79 / 80 / 81 / 82 / 83 / 84 / 85 / 86 / 87 / 88 / 89 / 90 / 91 / 92 / 93 / 94 / 95 / 96 / 97	Overdevelopment of site
<b>35</b>	11 / 12 / 13 / 14 / 22 / 23 / 29 / 31 / 32 / 35 / 36 / 37 / 38 / 75 / 76 / 77 / 79 / 80 / 81 / 82 / 83 / 84 / 85 / 86 / 87 / 88 / 89 / 90 / 91 / 92 / 93 / 94 / 95 / 96 / 97	The number of units needs to be reduced
<b>34</b>	05 / 14 / 25 / 26 / 28 / 29 / 31 / 32 / 35 / 36 / 37 / 74 / 75 / 76 / 77 / 79 / 80 / 81 / 82 / 83 / 84 / 85 / 86 / 87 / 88 / 89 / 90 / 91 / 92 / 93 / 94 / 95 / 96 / 97	To be consistent with other site the 'development requirements' should be amended to refer to nearby Conservation Areas.
<b>33</b>	12 / 22 / 25 / 26 / 28 / 29 / 31 / 32 / 36 / 37 / 74 / 75 / 76 / 77 / 79 / 80 / 81 / 82 / 83 / 84 / 85 / 86 / 87 / 88 / 89 / 90 / 91 / 92 / 93 / 94 / 95 / 96 / 97	The picture in the Plan needs to be updated
<b>31</b>	23 / 25 / 26 / 28 / 29 / 31 / 35 / 36 / 74 / 75 / 76 / 77 / 79 / 80 / 81 / 82 / 83 / 84 / 85 / 86 / 87 / 88 / 89 / 90 / 91 / 92 / 93 / 94 / 95 / 96 / 97	The development does not aim to 'deliver sustainable, mixed and balanced communities'
<b>9</b>	05 / 11 / 23 / 25 / 26 / 36 / 82 / 83 / 102	Potential groundwater pollution and contamination risk from previous use as gasworks
<b>6</b>	05 / 35 / 74 / 78 / 82 / 83	The buildings proposed will overshadow the neighbours
<b>4</b>	05 / 78 / 82 / 83	The buildings will lead to a loss of view for residents
<b>2</b>	36 / 37	Increased pressure on key services eg. doctors, dentists
<b>1</b>	57	Allocation requirements does not stipulate the need to integrate biodiversity

<b>Officer Response</b>	
Capacity	<p>It is considered that the current indicative capacity figure is appropriate as it would make very efficient use of the available land in this sustainable location. This approach is very much in line with the Government's (and the Local Plan's) aspiration to make the most efficient use of land in town centre / edge of centre locations. As with all sites, it may be that the capacity figure may change as the scheme progresses and the Council is better able to understand any constraints and related design and massing issues and the potential impact that this will have on the surrounding area. The Local Plan indicates that the indicative figures for all sites are usually the 'minimum' expectations. As such, whilst the figure actually delivered on site may be higher than the one referred to it does not rule out a lower capacity coming forward if that is deemed to be more appropriate following a more detailed analysis of the site and any proposed scheme,</p> <p>As a scheme is assessed in detail the specific design points raised (relating to overshadowing, materials etc) will be given full and careful consideration.</p>
Housing mix	<p>There is a significant housing need for all types and sizes in the borough. As such, the Plan (as a whole) seeks to deliver a range of housing types to best meet the identified needs. However, whilst the Council will encourage a mix of housing types on most sites it is not necessarily the case that each development site will deliver housing types to meet all needs. The housing mix expected will be largely dependent on the location and character of the individual site and the indicative capacity figures provided for each allocation respond to this. For example, town centre sites (such as Lyndhurst Rod) and other sites well served by facilities and infrastructure are more suited to higher density (predominantly 1 and 2 bed) flatted developments (which could include tall buildings) than the edge of town sites which are more likely to deliver family housing. As allocated sites come forward for development the Council will use all relevant policies within the WLP to ensure that the site delivers the most appropriate development to meet identified needs whilst respecting the character of the surrounding area. This approach is also outlined in para 5.8 of the Local Plan and a modification is suggested to the policy DM1 criteria a) to make this clearer.</p>
Parking / Congestion	<p>This centrally located site is well served by local facilities and public transport routes. As such, it is hoped that new residents may be less dependent on private cars. However, when considering new development it is necessary to consider its potential impact on the existing transport network – how it links to the network and the provision of adequate space for servicing and parking. The Worthing Local Plan Transport Study provides an assessment of the impact of potential allocations and identifies appropriate mitigation measures. This work has then informed policy DM15 (Sustainable Transport &amp; Active Transport) which development proposals will need to comply with. This</p>

	policy provides clear guidance in relation to: car parking provision; the promotion of sustainable modes of transport; the need for detailed site specific Transport Assessments; and the promotion of Car Club schemes.
Infrastructure	In liaison with infrastructure providers, the Council has updated its Infrastructure Delivery Plan (IDP) to establish the quality and capacity of existing infrastructure and what additional infrastructure is needed to support future growth within the Borough. The Council will work with infrastructure providers and developers to facilitate the timely delivery of infrastructure needed to support development. To ensure this is the case the Council will expect developers to fund (through CIL or a S106 agreement) or provide the necessary improvements so as to mitigate or compensate for the impact of their proposal.
Contamination	Given the former use of this site it is inevitable that there will be a degree of contamination. For that reason there is a clear requirement for the site promoter / applicant to undertake detailed investigations of the contamination to assess the level of remediation required. Permission for development (particularly residential development) will not be granted until such time that the Council is satisfied that any contamination has been (or will be) remediated to a suitable / compliant level. Where appropriate, Planning Conditions will be used to formalise this.
Conservation Areas	In response to the heritage assets that lie in close proximity to this site and to be consistent with other allocations a new Development Requirement is proposed as follows:  <b>h) be sensitive to the Conservation Areas that lie in close proximity to this site.</b>
Aerial Photograph	The Council acknowledges that the aerial photo shown on page 89 is a little out of date as it shows the gasholder which has now been dismantled. Unfortunately this image (from 2018) is the latest that is available. Under the Council's mapping agreement the supplier is contracted to resurvey the borough every 3 years (but there may of course have been some delay to this due to the Covid 19 Pandemic). It is now expected that the survey will be flown again this year and the image will be updated if the latest version is received before the final publication of the WLP.
Biodiversity	Policy DM18 clearly sets out the Council's position to biodiversity. The Plan should be read as a whole so, as such, it is not felt necessary to amend the wording relating to biodiversity as this would duplicate other parts of the Plan.