

Attention of Mr Steven Lee BA (hons) MA MRTPI

C/O Mr Chris Banks

Programme Officer

Banks Solutions

64 Lavinia Way

East Preston

West Sussex

BN16 1EE

Dear Mr Lee,

SUBMISSION OF HEARING STATEMENT ON BEHALF OF THE WORTHING SOCIETY

MATTER 2-BROAD SPATIAL STRATEGY AND STRATEGIC POLICY

MORNING SESSION – 3 NOVEMBER 2021

SDWLP Policies SS5 and SS6

I am writing on behalf of the Worthing Society to submit our 'Hearing Statement' in respect of the above SDWLP Policies SS5 and SS6. Thank you for the opportunity of commenting on these important matters. Here is our representation :

1.PROTECTION OF LOCAL GREEN GAPS- POLICY SS5

We consider the designation and protection of 'Local Green Gaps' helps to avoid coalescence. This policy is important as stated in the SWDLP 'in preserving the separate characters and identities of different settlements by providing both physical and visual breaks.' This proactive policy is essential to prevent further encroachment of these areas at a time when open green space has been shown to be particularly beneficial for recreation contributing to mental and physical well-being.

This strategy is particularly relevant given the compact nature of Worthing which has relatively few breaks in development along on the narrow coastal strip between Brighton and Chichester. In addition these gaps are crucially important to the setting and enjoyment of the South Downs National Park, the protection of woodland and the various wildlife habitats which have been identified in these areas.

During the Consultation periods there has been strong support from the community for the protection of these historic gaps which give the areas a sense of place and identity. Local Green Space Designation is in our view fully justified to protect green areas which are of particular importance to the local communities they serve.

The Society therefore fully supports the four areas identified to be designated as 'Local Green Gaps'- two between Worthing and Ferring to the west:

- Goring-Ferring Gap;

- Chatsmore Farm;

and two between Worthing and Lancing / Sompting to the east:

- Brooklands Recreation Area and adjoining allotments;

*Land East of Upper Brighton Road (east of allocation site A15)

Each area has a distinctive character and the first two were proposed by the local community:

a) The Goring-Ferring Gap,: this area comprises flat arable fields, giving a valued break in the built up coastal area . There is an original, visual connection between the undeveloped part of the coastline and the South Downs National Park to the north, which is historically important. Several local groups presented information in support of its request to designate this gap as Local Green Space. It is also important to the setting of the Grade 11 Listed mansion, Goring Hall, local views, and to local birds and wildlife.(The area is in fact designated Local 62 Wildlife Site). This distinctive gap close to the coastal area affords opportunities for recreation and relaxation.

b)Chatsmore Farm covers 28 hectares in Worthing and 2 hectares in Arun. It comprises arable fields (Grade 1 agricultural land) with the Ferring Rife flowing east to west crossing the middle of the site. The designation request highlighted its historic associations, wildlife and recreational value for the community and Worthing as a whole. This land is also a haven for birds and wildlife. In addition, the land is in the setting of the South Downs National Park and the Grade II* Registered Park and Garden 'Highdown Garden' which lie to the north. The expanse of Chatsmore Farm is clearly viewed from the Highdown Conservation Area and the historic Highdown Hill on the ridge of the South Downs.

c) Brooklands is an important open and scenic area to the eastern boundary of Worthing. There is considerable interest from the Council and local residents in developing the park for recreational use. The SDNP can be viewed when looking north

d). Land East of Upper Brighton Road: another significant factor in support of retaining and protecting these Local Green Gaps is that the adjoining areas of Arun and Adur have adopted a complementary policy to retain these open spaces. This has particular relevance to the Land East of Brighton Road (and allocation Site A15) .

The protection of these gaps which will be accorded green belt status is supported by National Planning Policy Framework (NPPF) Sections 13, Protecting Green Belt Land and Section 15 Conserving and Enhancing the natural environment

The policy to protect Local Green Space SS6 is much valued both to the communities they serve and in the wider context as it relates to Worthing's character. We welcome the fact that the designation of these areas is part of a strategic approach shared with other neighbouring authorities.

In summary we consider the surveys to examine each of these areas for designation as Local Green Space and Local Green Gaps were detailed and extensive. They incorporated strongly held views and evidence from the local communities. We believe that the criteria for designation of these areas have been fulfilled. The areas are not extensive but are rather welcome green gaps between built up areas to prevent coalescence of settlements. Each area is distinctive and important to the area it serves. These sites illustrates all or some of the following features : historic significance, protection of wildlife, beauty., recreational value and tranquillity. They all relate visually to the setting of the South Down's National Park.

Our green infrastructure is part of our heritage and in the same way as the historic built environment: it forms a legacy to our future generations.

2. THE COUNTRYSIDE

We have noted that the SWDLP references the significance of the South Downs National Park (SDNP) and the importance of protecting the 'setting' of this historic area. The Council will actively consider whether the new development plans in the proximate area will adversely affect the setting of the national park and its status as an 'International Dark Skies Reserve.' This is a positive strategy given the distinctive wildlife and cultural heritage of the National Park.

In addition we welcome the policy initiative to protect and enhance the areas of countryside abutting the SDNP and within the environs of Worthing. This is important for recreation and to protect the green infrastructure and biodiversity. The recent Covid 19 emergency has emphasised the importance of accessibility to open green space for tranquil space and recreation.

3. HERITAGE ASSETS

The Worthing Society supports the policies within the SWDLP to protect and conserve our heritage assets which contribute positively to the unique character of the town and give a sense of interest and destination for visitors. We consider that our open green spaces are part of the historic layout of Worthing and compliment the built heritage environment. We strongly support the Councils decision in respect of the Listed Green Space Designation allocations for the four significant areas recorded in the plan.

The Worthing Society Committee and members are in favour of the policies to actively promote the history of Worthing thereby contributing to the visitor experience. This in turn will benefit the tourist economy which is a major contributor to the town's resources. Our heritage assets create a sense of place and pride in the town. In particular the reference to the iconic Pier is welcome as this provides a destination for visitors to enjoy an active seafront area. Worthing is a traditional seaside town with a backdrop of Regency and Victorian buildings which it is desirable to protect.

Susan Belton

Worthing Society Chairman

19.10 2021

Attention of Mr Steven Lee BA (hons) MA MRTPI

C/O Mr Chris Banks

Programme Officer

Banks Solutions

64 Lavinia Way

East Preston

West Sussex

BN16 1EE

Dear Mr Lee,

SUBMISSION OF HEARING STATEMENT ON BEHALF OF THE WORTHING SOCIETY

MATTER 5: SITE ALLOCATION A13 – TITNORE LANE

MORNING SESSION – 11 NOVEMBER 2021

Thank you for the opportunity of commenting on this Site Allocation. I am writing on behalf of The Worthing Society which is a conservation charity. We would ask you to consider the following representation regarding this site:

1. This is greenfield land which abuts the South Downs National Park, (SDNP) to the west and to the north. A residential development would adversely affect the setting of the SDNP which would not be consistent with the National Planning Policy Framework, Section 15, paragraphs 174 - 178
2. The site abuts parcels of Ancient Woodland which is an irreplaceable resource. A housing development could harm the setting of this valuable landscape feature.
3. The woodland within and surrounding the site forms part of the Titnore & Goring Woods Complex and Local Wildlife Site. We submit that a residential development of 65 dwellings would result in a harmful effect on the woodland and associated wildlife. In the wider context a development of this size and in this location would severely harm the setting of this area which at present is primarily rural. Titnore Lane and woods are a distinctive and historical area.
4. Artificial lighting produced by the development could adversely affect the setting of the National Park, the Ancient Woodland and the Local Wildlife site.
5. The SDNP is actually designated as an 'International Dark Skies Reserve.' A development of 65 dwellings with associated lighting and road lighting would not be consistent with this designation
6. Small parts of the site have been identified as being prone to a high risk of flooding which may render the land in essence unsuitable for residential development
7. The wide tree belt dividing the site is an unusual and important feature which adds to the rural character of the surrounding area of Titnore and Goring Woods
8. Worthing Borough Council has declared a 'Climate Emergency.' The protection of our open green spaces has become increasingly vital due to the climate change.

8. The Covid 19 emergency has illustrated the importance of access to green belt land to the physical and mental well-being of communities.

9. The indicative number of dwellings for this site is relatively low at 65 and would not in the Society's view compensate for the harm to the surrounding rural environment and the SDNP.

For the reasons stated the Worthing Society submits that this site should not be identified as suitable for development within the Draft Local Plan and should be withdrawn.

Susan Belton.

Mrs Susan Belton

Worthing Society Chairman

18 October 2021

Registered Charity No: 286899

Attention of Mr Steven Lee BA (hons) MA MRTPI

C/O Mr Chris Banks

Programme Officer

Banks Solutions

64 Lavinia Way

East Preston

West Sussex

BN16 1EE

Dear Mr Lee,

SUBMISSION OF HEARING STATEMENT ON BEHALF OF THE WORTHING SOCIETY

MATTER 5: SITE ALLOCATION A15 – UPPER BRIGHTON ROAD

MORNING SESSION – 11 NOVEMBER 2021

Thank you for the opportunity of commenting on this Site Allocation. I am writing on behalf of the Worthing Society which is a conservation charity. We would ask you to consider the following representation regarding this site:

1. This greenfield site contributes positively to the visual setting of the South Downs National Park which is an important heritage asset. A development at this site would in our view harm the setting and enjoyment of the National Park. This would be contrary to the Planning (Listed Buildings and Conservation Areas) Act 1990.

2. A housing development would in addition have an adverse effect on the setting of the Sompting Village Conservation Area and the Grade II Listed Upton Farmhouse which is again not consistent with the Planning (Listed Buildings and Conservation Areas) Act 1990. The development would not therefore enhance or better reveal the characteristics of the Conservation Area.

3. It is desirable to retain this open space to prevent the coalescence of Worthing and Sompting. The site relates to the open space directly to the north of the Upper Brighton Road forming a natural north to south gap.

4. The site is outside the identified built up area boundary. This area contributes positively to the green open space in the adjoining land at Adur District Council.

5. Worthing Borough Council have declared a 'Climate Emergency.'

6. The retention of our greenfield sites is becoming increasingly important for future generations both in terms of physical and mental well-being.

7. Section 15 of the National Planning Policy Framework, paragraphs 174 to 188 is a relevant planning consideration and a development at this site would not in our view be consistent with this policy.

For the reasons stated we submit that this site should not be recommended for development within the Draft Local Plan.

Susan Belton

Worthing Society Chair.

19 November 2021

Attention of Mr Steven Lee BA (hons) MA MRTPI

C/O Mr Chris Banks

Programme Officer

Banks Solutions

64 Lavinia Way

East Preston

West Sussex

BN16 1EE

Dear Mr Lee,

SUBMISSION OF HEARING STATEMENT ON BEHALF OF THE WORTHING SOCIETY

Matter 5-SITE ALLOCATION A9 Former Gas Works Site, Junction of Park Road and Lyndhurst Road

HEARING SESSION- AM 10.11.21

Thank you for the opportunity of commenting on this Site Allocation. I am writing on behalf of the Worthing Society which is a heritage and conservation charity. Here are our observations on this site and its inclusion in the Draft Local Plan

1. This is an environmental area of special character described as follows in the Council's 'Worthing Conservation and Heritage Guide as follows :

' The Character derives from small clusters of 19th century houses, cottages and industrial buildings all of simple design employing typical materials of period i.e. slate roofs, stucco walls, flint boundary walls, etc. Nos. 14-24, 29-37, 46-58, 60A, 82 and 86-92 all contribute to the area's special character.'

2. This is a predominantly low rise area which is also located near to the Steyne Gardens Conservation. In addition site is also close to Beach House Park, included on the Council's Register of Parks and Gardens of Local Historic Interest.

3. The indicative number of dwellings in the Draft Local Plan is 150, an increase from 85 units in the earlier Consultations. This is a relatively compact site and a density of 150 dwellings would not be easily absorbed by the surrounding area. The loss of the NHS car park for the nearby hospital for example will put a strain on the amenities of existing residents.

4. There is a current application to develop the site which has been submitted by the company St William. The development plans are for 209 units, well over the current indicative level and far in excess of the earlier recommended number of 85

5. The increased number of dwellings at 209 has produced a design showing over-development of a relatively compact site area. The tall element at 7 storeys and the scale and mass of the group of intermediate buildings will be over dominant and out of character with the local environs which as

stated are 'low rise.'

6. If this site proceeds for development we consider the number of dwellings should be reduced to produce a design which complements this characterful low-rise area and the proximate conservation area.

7. The density of the development will have an adverse effect on the amenity of the local residents particularly in terms of parking and overlooking on the north and south boundaries. There is a relatively low level of parking facilities included in the plans. The surrounding area is residential in character but there is pressure on parking from Worthing Hospital.

8. Despite the density the submitted plans, they do not include an allocation of 'affordable housing' which is much needed in the Worthing area, particularly for key workers.

9. There are chemical constraints associated with the industrial history of this site. Many local residents have serious concerns. We question whether remediation can be effectively carried out to a degree where the site will be safe for long term residential occupation. The site is close to existing residential homes and the land will need to be disturbed for development, thus releasing chemicals into the atmosphere. In our view an in-depth, independent scientific survey should be carried out to assess the level of contamination and the chemicals involved. Potentially a Public Consultation may need to take place to reveal the findings to the community.

In summary we consider that the constraints for this site have not been sufficiently overcome to a level where this site could be safely allocated for development within the Draft Local Plan

Susan Belton

Worthing Society Chair

19 October 2021.

Registered Charity No 286899

Attention of Mr Steven Lee BA (hons) MA MRTPI

C/O Mr Chris Banks

Programme Officer

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Dear Mr Lee,

SUBMISSION OF HEARING STATEMENT ON BEHALF OF THE WORTHING SOCIETY

MATTER 9: STRATEGIC APPROACH TO THE HISTORIC ENVIRONMENT

POLICY DM23 AND DM24

AFTERNOON SESSION – 16 NOVEMBER 2021

I am writing on behalf of the Worthing Society. We are a heritage and preservation charity, responsible for saving many of the listed buildings which survive in Worthing today. Thank you for the opportunity of submitting our comments.

The town has an extensive heritage map as illustrated below :

- 26 Conservation Areas (2 of which are in the National Park);
- 9 Environmental Areas of Special Character;
- over 360 listed buildings;
- more than 1,000 buildings of important local interest;
- 2 • a nationally registered Historic Park & Garden (Highdown Gardens, in the National Park);
- 10 parks and gardens of local historic interest;
- numerous sites of archaeological interest that although not scheduled are worthy of protection and preservation;
- its setting, including important views and landscape/townscape/seascape relationships;
- undesignated assets including locally listed buildings and features of architectural and design interest. Scheduled Ancient Monuments (Cissbury Ring & a bowl barrow, in the National Park).

POLICY DM23 STRATEGIC APPROACH TO THE HISTORIC ENVIRONMENT

We welcome the fact that the Draft Local Plan recognises the extent and value of Worthing's heritage assets and has a proactive, strategic approach for their protection. Our heritage assets create a unique sense of place, contributing to tourism and regeneration. It is important that the policy refers to the need to monitor the condition of listed buildings and to work within the policies of the National Planning Policy Framework, Historic England guidance and the Planning (Listed Buildings and Conservation Areas) Act 1990.

We have very much appreciated the opportunity of a meeting with the Officers at the 'Issues and Options' stage to represent our views on the importance of preserving our heritage assets and how change can be positively managed in the heritage environment.

Heritage Tools

The practical 'tools' the Council identify for achieving the safeguarding of our heritage are also welcome. These include the review of Worthing's 26 conservation areas to assess their condition, Article 4 Directives and actively monitoring the condition of heritage assets falling into disrepair or recorded on the Historic England 'At Risk Register.' The initiative to liaise with local heritage and community groups will also be important. This will highlight the importance of our built environment and connectivity with our green infrastructure. It is important that local residents feel they have a voice and a role to play in the protection of Worthing's heritage.

The Local Interest List

The Society would like to see a higher profile being given to the importance of the Local Interest List and to encourage public involvement to nominate buildings for inclusion. Historic England have advised that the vast majority of buildings suitable for Statutory Listing in Worthing have already been designated making the Local Interest List increasingly important to capture Worthing's unique history. We consider that an initiative by the Council to promote the Local Interest List and to invite suggestions by the local community would be productive in broadening Worthing's 'heritage map.' A 'user friendly' way for people to put forward their suggestions would be needed. This would create a sense of pride and interest in other areas of the town and would touch on social history, important again to the visitor experience.

In addition the re-establishment of the Conservation Area Advisory Committee (CAAC) would be a valuable tool in obtaining a representative view of the effect on heritage of new development from different sections of the community. Our heritage is here to be enjoyed and it is important that residents feel they have a voice.

DM24 THE HISTORIC ENVIRONMENT

Again we welcome the Council's policy that new development should take account of guidance in Worthing's Heritage and Conservation Guide. The SWDLP also stipulates that development plans must be of a high quality, respecting the context of the neighbouring heritage assets and demonstrating a strong sense of place.' Proposed developments should take account of the character and setting of the designated assets of Local List buildings with good quality design, and materials to contribute positively to the area. The quality of new design in the town centre sites identified in the SWDLP (Union Place, Teville Gate and the Gas Works Site) is particularly important. The new plans should enhance and complement the intrinsic character of Worthing in terms of scale, mass and design.

The updating of Worthing's Heritage and Conservation Guide will be a significant step forward in the protection of our heritage assets which include views, parks/gardens and archaeological features. It should also act as a guide to developers. Policy DM24 will we consider, be a significant tool in safeguarding our heritage and preventing some of the planning mistakes of the past many historic buildings in the town were demolished.

Susan Belton

Mrs Susan Belton

Worthing Society Chair

20 October 2021

Registered Charity No. 286899