

## **Chapter 4 - Site Allocations**

### **Proposed Modification Reference: MM13**

#### **Para / Policy: Paragraph 4.1**

##### **Description of modification:**

- Paragraph revised to clarify role of Flood Risk and Sequential Test.

##### **Reason for Modification:**

- In response to SDWLP-59 (Environment Agency).

##### **Text from Submission Draft Worthing Local Plan - Paragraph 4.1:**

4.1 As already established in this Plan, a key part of the overarching strategy is to maximise development on brownfield land and create sustainable urban extensions adjacent to the existing urban area. This will be achieved, in part, through the delivery of sites that are allocated for development in this chapter. All sites included in this section have been assessed in detail through the Council's Strategic Housing Land Availability Assessment (SHLAA) and the Local Plan Sustainability Appraisal. Supported by these documents and other evidence, a conclusion has been reached that they should be allocated for development.

##### **Text proposed by MM13: Paragraph 4.1**

4.1 As already established in this Plan, a key part of the overarching strategy is to maximise development on brownfield land and create sustainable urban extensions adjacent to the existing urban area. This will be achieved, in part, through the delivery of sites that are allocated for development in this chapter. All sites included in this section have been assessed in detail through the Council's Strategic Housing Land Availability Assessment (SHLAA), the Local Plan Sustainability Appraisal, and the SDWLP Flood

Risk Sequential and Exception Test. Supported by these documents and other evidence, a conclusion has been reached that they should be allocated for development. The sequential test concluded that the majority of sites are located in Flood Zone 1 and these are the most sequentially preferable. However due to the limited number of sites available, to ensure that every effort has been made to meet Worthing's full local housing need as far as is practicable and reasonable, all suitably available sites are required including those at risk of flooding. Even with these there is still insufficient capacity to meet Worthing's full local housing need. Therefore it is considered that all the above sites pass the sequential test, as required by the NPPF.

---

## **Proposed Modification Reference: MM14**

### **Para / Policy: Paragraph 4.8**

#### **Description of modification:**

- Paragraph revised to clarify role of specific development requirements.

#### **Reason for Modification:**

- As discussed during the Hearing Session - to clarify policy position and to ensure effectiveness.

#### **Text from Submission Draft Worthing Local Plan - Paragraph 4.8:**

4.8 Site Allocations Proposals for development should be supported by robust evidence and must comply with national planning legislation, other related guidance and the Council's Validation Checklist. Proposals will also need to comply with all related Strategic Policies (Chapter 2) and Development Management policies (Chapter 5) set out elsewhere in this Local Plan. In addition, proposals will need to meet (as a minimum) any site specific development requirements set out in the following policies. The use of masterplans may be necessary for some allocations to ensure that development is properly coordinated.

### **Text proposed by MM14: Paragraph 4.8**

4.8 Site Allocations Proposals for development should be supported by robust evidence and must comply with national planning legislation, other related guidance and the Council's Validation Checklist. Proposals will also need to comply with all related Strategic Policies (Chapter 2) and Development Management policies (Chapter 5) set out elsewhere in this Local Plan. In addition, each allocation highlights specific considerations relating to the development of each site and applicants will need to meet (as a minimum) the development requirements that are set out in the following policies. The use of masterplans may be necessary for some allocations to ensure that development is properly coordinated.

---

### **Proposed Modification Reference: MM15**

#### **Para / Policy: Sites Map and Legend**

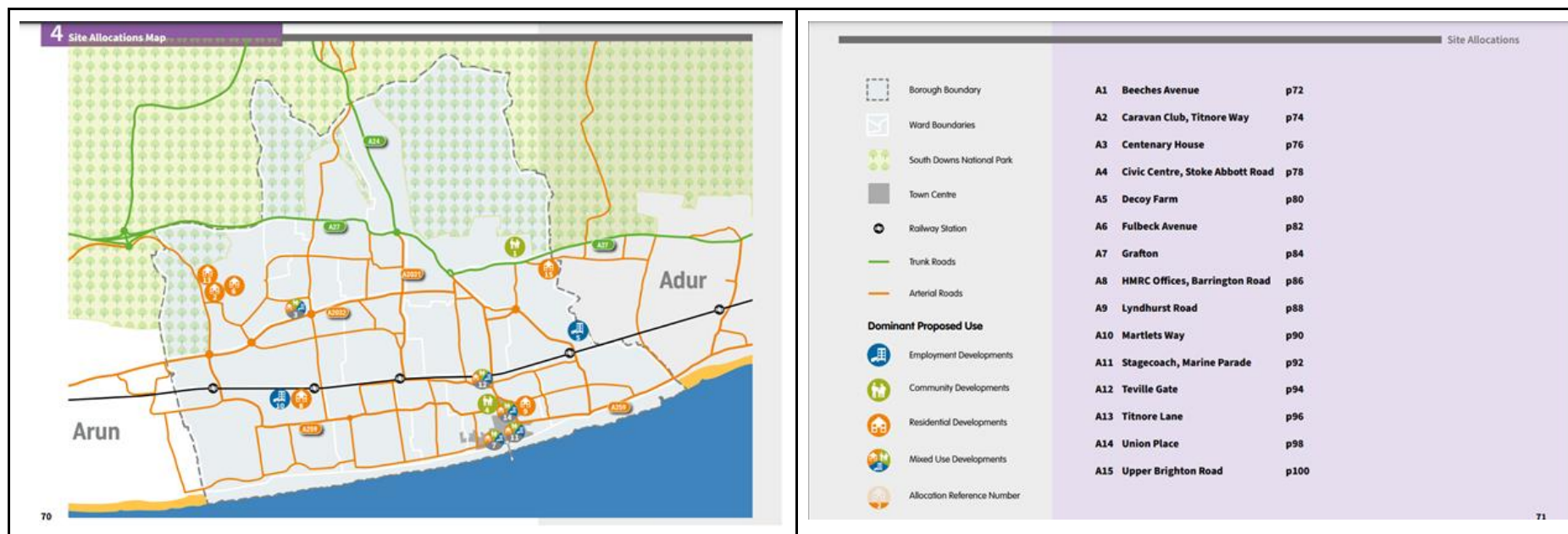
##### **Description of modification:**

- To reflect MM28 the Site Allocations Map (and associated Legend) has been amended to delete Allocation A13.

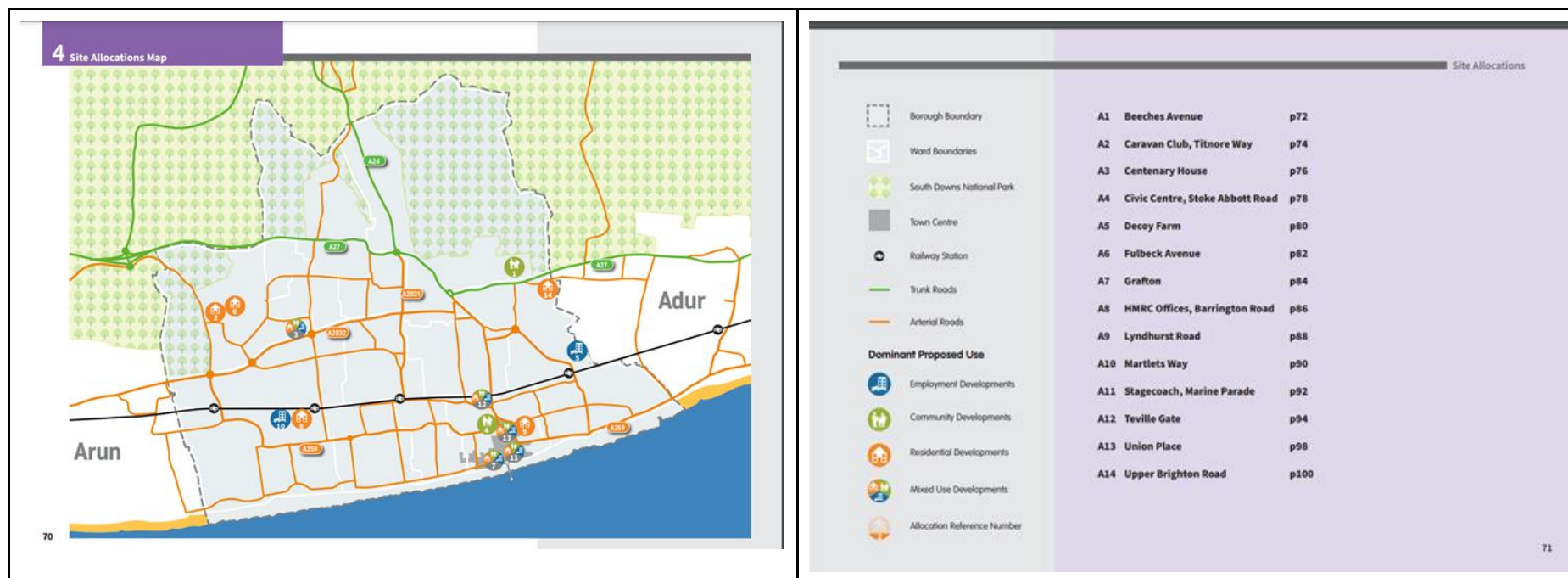
##### **Reason for Modification:**

- As discussed during the Hearing Session and to ensure that the WLP is effective.

## Site Map and Legend from Submission Draft Worthing Local Plan - Page 70 & 71



## Site Map and Legend proposed by MM15: Pages 70 & 71



## Proposed Modification Reference: MM16

### Para / Policy: A1 Beeches Avenue

#### Description of modification:

- Development requirements (a - g) have been revised and new requirements (h) have been added.

**Reason for Modification:**

- As discussed during the Hearing Session - to clarify policy position and to ensure effectiveness.

**Text from Submission Draft Worthing Local Plan - Allocation A1 Beeches Avenue:****Development Requirements - any future development proposals should:**

- a) provide safe and suitable access from Lyons Farm that does not compromise or negatively impact operations of the Football Club;
- b) deliver improvements / links to the existing footpath network to improve access to the wider area and the SDNP, including a connection through the site between the PRowS at Charmandean Lane on the west of the site and through to Lambleys Lane on the east. There is also an opportunity for development to contribute to improvements on the existing PRow to the east along the northern edge of the business park;
- c) respond to the requirements of the Worthing Air Quality Action Plan and deliver a package of sustainability measures to mitigate the impact of development. This should include a commitment to deliver a car club and 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;
- d) be of a high quality that conserves and enhances the setting of the SDNP, ensuring a transition from the site to the SDNP, with lower density development closer to the SDNP boundary;
- e) incorporate planting of species native to this area of chalk downland to form a robust landscape boundary and buffer to the southern edge of the SDNP;
- f) Provide a Sustainable Urban Drainage System that includes measures to protect groundwater quality for drinking water;
- g) give consideration to suitable relocation of the car repairers;

h) retain features of local value and where appropriate enhance these features and the wider site through management and complimentary habitat creation.

**Text proposed by MM16 - Allocation A1 Beeches Avenue:**

**Development Requirements - any future development proposals should:**

- a) deliver a residential scheme comprising of a minimum 90 dwellings;
- b) provide safe and suitable primary vehicular access from Lyons Farm that does not compromise or negatively impact operations of the Football Club;
- c) deliver improvements / links to the existing footpath network to improve access to the wider area and the SDNP, including a connection through the site between the PRowS at Charmandean Lane on the west of the site and through to Lambleys Lane on the east. There is also an opportunity for development to contribute to improvements on the existing PRow to the east along the northern edge of the business park;
- d) respond to the requirements of the Worthing Air Quality Action Plan and deliver a package of sustainability measures to mitigate the impact of development. This should include a commitment to promote a travel plan to improve the accessibility and sustainability of the site. EV charge points (with a power output of at least 7kW) should be provided for all residential units, fitted ready for first occupation;
- e) incorporate planting of species native to this area of chalk downland to form a robust landscape boundary and buffer to the southern edge of the SDNP;
- f) provide a Sustainable Urban Drainage System that has been informed by a hydrogeological risk assessment to ensure and demonstrate the system does not pose an unacceptable risk to groundwater;
- g) development proposals should ensure the protection and enhancement of existing biodiversity assets in line with Policy DM18, including the provision of biodiversity net gain. Existing high-quality trees should be retained where possible and new green infrastructure delivered that provides opportunities to link to the Borough-wide green infrastructure network;

h) provide a high quality design with particular attention to height and massing. Ensure the scale of development, particularly on the boundaries of the site, respects the scale and established building line of adjoining properties. Ensure that development has a suitable relationship with and does not have an unacceptable impact on neighbouring residents in terms of private amenity, overlooking and that daylight and sunlight implications are appropriately managed.

---

## **Proposed Modification Reference: MM17**

### **Para / Policy: Paragraph 4.14 and A2 Caravan Club**

#### **Description of modification:**

- Supporting text updated to provide latest position with regards to the existing Caravan Club
- Additional bullet point added to site constraints list to refer to Flood Risk sequential and exception text
- Development requirements (a - g, i and k) have been revised and new requirement (k) has been added.

#### **Reason for Modification:**

- As discussed during the Hearing Session - to clarify policy position and to ensure effectiveness.
- Update to highlight recent changes and in response to MIQ-96.
- In response to SDWLP-59 (Environment Agency).

#### **Text from Submission Draft Worthing Local Plan - Paragraph 4.14:**

4.14 The site is owned by Worthing Borough Council and leased to the Caravan Club. The Council and the Caravan Club are working towards the grant of a new long term lease to the Club for approximately 3 hectares of the northern part of the site. This allows for the remainder of the site (the southern portion – 2.7 ha) to be allocated for residential development whilst at the same time ensuring that the existing use is retained and improved.



**Text proposed by MM16 - Paragraph 4.14:**

4.14 The site is owned by Worthing Borough Council and was previously leased to the Caravan Club. As reflected in this allocation, the Council and the Caravan Club had been working towards the grant of a new long term lease to the Club for approximately 3 hectares of the northern part of the site. This would have allowed for the remainder of the site (the southern portion – 2.7 ha) to be allocated for residential development whilst at the same time ensuring that the existing use is retained and improved. Circumstances have since changed and the Caravan Club has surrendered their lease and intend to vacate the site by the end of 2022. As a consequence, the Council is now considering options for the northern part of this site including the potential for additional housing and further evidence will be gathered to help inform future decisions.

**Text from Submission Draft Worthing Local Plan - Allocation A2 Caravan Club:****Site Constraints**

- Titnore & Goring Woods Local Wildlife Site borders the site to the north and west, this includes a belt of Ancient Woodland running along the northern boundary.
- Lake lies to the north east of the site – a breach of the dam has previously caused flooding in the local area.
- North Barn Farm, an open windrow composting site, is located to the south west of this site (west of Titnore Lane).

Development Requirements - any future development proposals should:

- a) retain and enhance boundary vegetation to maintain self-containment and limit views of the site locally and from the National Park;
- b) adopt the sequential approach so the most vulnerable uses are located in the areas at lowest risk of flooding;
- c) maintain a suitable buffer to the lake and demonstrate how flood risk will be safely managed across the lifetime of the development, taking climate change into account, and not increased elsewhere;

- d) the design and layout of this site (along with neighbouring site at Fulbeck Avenue) should avoid any potential impacts on the Local Wildlife Site;
- e) deliver net gain in biodiversity and high quality green infrastructure to include the internal tree groups which should be incorporated into the design of the new development;
- f) development proposals should be informed by up to date ecological information;
- g) help to protect, and where possible, support the continued use of the land to the north as a caravan site;
- i) in line with the Waste Local Plan (Policy W2) proposals should give consideration to the continued safeguarding of the composting site located to the west;
- j) provide a footway adjacent to the southern boundary of the site on Titnore Way;
- k) 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;
- k) ensure a suitable relationship with the site to the east (A6 – Fulbeck Avenue) in terms of private amenity and overlooking.

**Text proposed by MM17 - Allocation A2 Caravan Club:**

**Site Constraints**

- Titnore & Goring Woods Local Wildlife Site borders the site to the north and west, this includes a belt of Ancient Woodland running along the northern boundary.
- Lake lies to the north east of the site – a breach of the dam has previously caused flooding in the local area.
- North Barn Farm, an open windrow composting site, is located to the south west of this site (west of Titnore Lane).

- The SFRA identifies the eastern section of the site as being at a high risk of groundwater flooding. This site was included in the SDWLP Flood Risk Sequential and Exception Test which was informed by the Level 2 SFRA (2020).

Development Requirements - any future development proposals should:

- a) deliver a residential scheme comprising of a minimum 100 dwellings;
- b) conserve and enhance the setting of the SDNP and mitigate the visual impact of development (including the effects of artificial lighting) with consideration given to the transition into the Park and views to/from the Park having regard to the recommendations in the Worthing Landscape and Ecology Study;
- c) seek to ensure the most vulnerable uses are located in the areas at lowest risk of flooding and maintain a suitable buffer to the lake;
- d) a site specific Flood Risk Assessment should demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its uses, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. This should have regard to the measures identified in the Level 2 SFRA (2020) and a SuDS scheme to provide mitigation and opportunities to achieve a reduction in overall flood risk;
- e) ensure that the design and layout of this site (along with the neighbouring site at Fulbeck Avenue) should safeguard and have regard to opportunities for the enhancement of the Local Wildlife Site;
- f) development proposals should ensure the protection and enhancement of existing biodiversity assets in line with Policy DM18, including the provision of biodiversity net gain. Existing high-quality trees should be retained where possible and new green infrastructure delivered that provides opportunities to link to the Borough-wide green infrastructure network;
- g) in line with the West Sussex Waste Local Plan (Policy W2) proposals should not prejudice the continued safeguarding or affect the operation of the composting site located to the west;
- h) provide a footway adjacent to the southern boundary of the site on Titnore Way;

- i) deliver a package of sustainable travel measures which should include a commitment to promote a travel plan to improve the accessibility and sustainability of the site. EV charge points (with a power output of at least 7kW) should be provided for all residential units, fitted ready for first occupation;
  - j) ensure a suitable relationship with the site to the east (A6 – Fulbeck Avenue) in terms of private amenity and overlooking;
  - k) provide an appropriate level of contribution towards highway capacity improvements at the A259/A2032 Goring Crossways junction and safety and speed reduction measures at the Yeoman Road / Palatine Rd junction.
- 

### **Proposed Modification Reference: MM18**

### **Para / Policy: A2 Caravan Club Map Extracts Page 75**

#### **Description of modification:**

- In line with MM17 above, the hatching used to indicate the retained Caravan Club has been deleted.

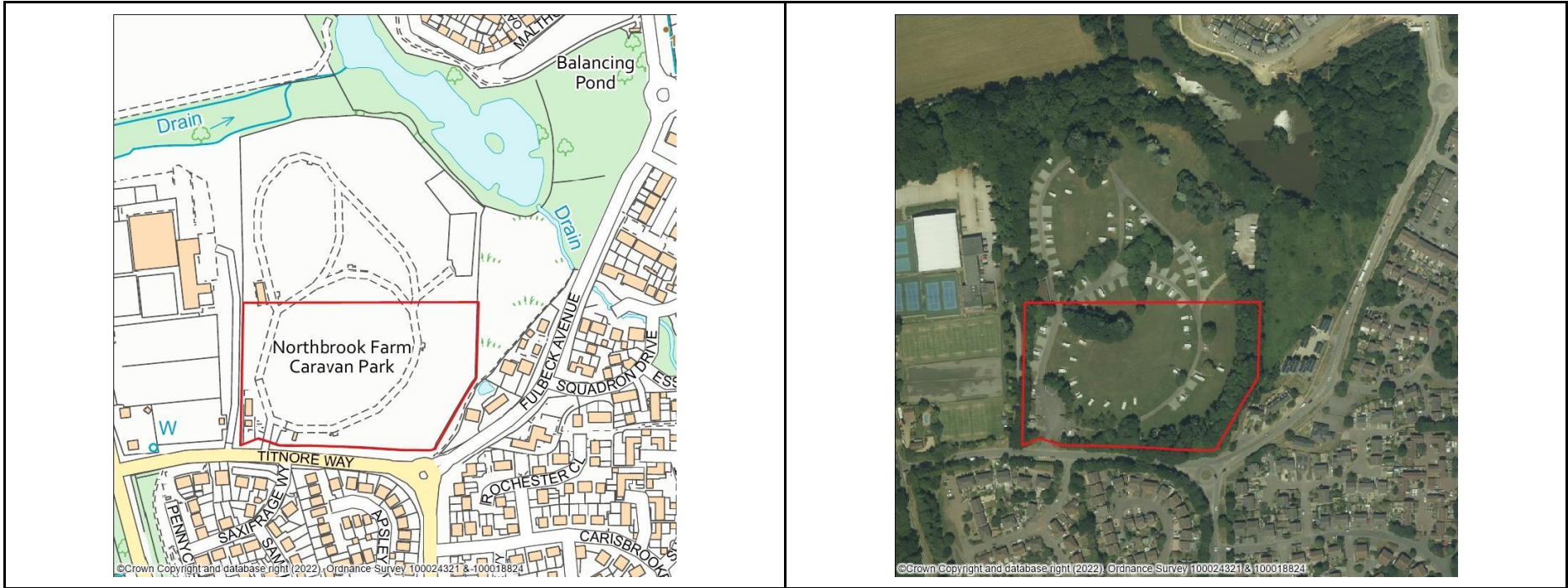
#### **Reason for Modification:**

- For consistency and to ensure that the Plan is effective.

## A2 Site Map and Aerial Photograph from Submission Draft Worthing Local Plan - Page 75



A2 Site Map and Aerial Photograph as Proposed by MM18



---

**Proposed Modification Reference: MM19****Policy / Para Number: A3 Centenary House****Description of modification:**

- Indicative Capacity has been amended
- Paragraph 4.15 has been amended with additional text inserted and some existing text being deleted
- First bullet point under Site Constraints subheading has been amended
- Development requirements (a, b and c) have been revised and additional requirements (e, f, g, h, i) have been inserted.

**Reason for Modification:**

- For consistency and in response to Inspector's Initial Question 17 (Ref-IL01.
- To ensure the policy is up to date and effective and in response to MIQ-98.
- To ensure the policy is effective and consistent with national policy and in response to MIQ-99.

**Text from Submission Draft Worthing Local Plan - Indicative Capacity:**

Indicative Capacity - 250 residential units & 10,000 sqm employment floorspace

**Text proposed by MM19 - Indicative Capacity:**

Indicative Capacity - 250 residential units & 10,000 sqm employment (part re-provided)

**Text from Submission Draft Worthing Local Plan - Paragraph 4.15:**

4.15 This previously developed site lies within the existing built up area and is currently in use as offices occupied by West Sussex County Council (WSCC) services and Sussex Police. The site is bound by the A2032 to the south, residential properties to the west

& north and Durrington Lane to the east. It includes a prominent 6-storey tower with other 2-3 storey buildings providing a total of 11,000 sqm of office space along with a large expanse of parking (300+ spaces). A police custody suite, which is to be retained, is located to the west of the site. The offices are currently under-utilised, expensive to maintain and require significant investment. Redevelopment provides an opportunity to make more efficient use of land, and re-provide and enhance facilities for Sussex Police and WSCC (approx. 5,000 sqm) alongside the delivery of a multi-agency hub offering integrated and co-located public services. Redevelopment would also make use of surplus land for additional employment space (approx. 5,000 sqm) and new homes.

**Text proposed by MM19 - Paragraph 4.15:**

4.15 This previously developed site lies within the existing built up area and is currently in use as offices occupied by West Sussex County Council (WSCC) services and Sussex Police. The site is bound by the A2032 to the south, residential properties to the west & north and Durrington Lane to the east. It includes a prominent 6-storey tower with other 2-3 storey buildings providing a total of 11,000 sqm of office space along with a large expanse of parking (300+ spaces). A police custody suite, which is to be retained, is located to the west of the site. The offices are currently under-utilised, expensive to maintain and require significant investment. Redevelopment provides an opportunity to make more efficient use of land, and potential to re-provide and enhance facilities for the existing occupiers Sussex Police. West Sussex County Council has recently announced its intention to relocate their services from this site to Durrington Bridge House and elsewhere in the Worthing area. Redevelopment would make use of surplus land for new homes and additional employment space appropriate to the character of this residential area.

**Text from Submission Draft Worthing Local Plan - Allocation A3 Centenary House:**

**Site Constraints**

- Within an area considered to be at a high risk of groundwater flooding.
- Within an area containing recorded archaeological remains.
- Protection of existing employment uses.
- A number of protected trees border the site.
- The transport study indicates that, at peak times, the Durrington Lane north approach is operating over capacity.



**Development Requirements - any future development proposals should:**

- a) deliver a mixed-use community-led scheme with facilitating residential development;
- b) enhance boundary vegetation and incorporate the protected trees;
- c) respond to the findings of the Worthing Local Plan Transport Study and seek to improve the operational capacity and safety of Durrington Lane and associated site access;
- d) suitably address the prominent south-east corner of the site.

**Text proposed by MM19 - Allocation A3 Centenary House:**

**Site Constraints**

- Within an area considered to be at a high risk of groundwater flooding and likely to be at a higher risk from surface water flooding in the future. This site was included in the SDWLP Flood Risk Sequential and Exception Test which was informed by the Level 2 SFRA (2020).
- Within an area containing recorded archaeological remains.
- Protection of existing employment uses.
- A number of protected trees border the site.
- The transport study indicates that, at peak times, the Durrington Lane north approach is operating over capacity.

**Development Requirements - any future development proposals should:**

- a) deliver a residential and employment scheme comprising of a minimum 250 dwellings and approximately 10,000 sqm employment floorspace;

- b) development proposals should ensure the protection and enhancement of existing biodiversity assets in line with Policy DM18, including the provision of biodiversity net gain. Existing high-quality trees should be retained where possible and new green infrastructure delivered that provides opportunities to link to the Borough-wide green infrastructure network;
- c) provide suitable site access and an appropriate level of contribution towards safety and highway capacity improvements at the A2032 / Durrington Lane junction, highway capacity improvements at the A259/A2032 Goring Crossways junction and safety and speed reduction measures at the Yeoman Road / Palatine Rd junction;
- d) suitably address the prominent south-east corner of the site;
- e) ensure layout is planned to ensure future access to existing water and/or wastewater infrastructure for maintenance and upsizing purposes. Phase occupation of development to align with the delivery of sewerage infrastructure, in collaboration with the service provider;
- f) undertake an assessment of the archaeological remains and ensure that any archaeological assessment requirements are implemented;
- g) ensure that contaminated land is appropriately assessed and where necessary appropriate remediation takes place. Consider the implications of this to ensure appropriate sustainable drainage systems are provided;
- h) a site specific Flood Risk Assessment should demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its uses, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. This should have regard to the measures identified in the Level 2 SFRA (2020) and a SuDS scheme to provide mitigation and opportunities to achieve a reduction in overall flood risk;
- i) seek to ensure the most vulnerable uses are located in the areas at lowest risk of flooding.

---

## **Proposed Modification Reference: MM20**

### **Policy / Para Number: A4 Civic Centre**

#### **Description of modification:**

- Indicative Capacity has been amended
- Site Constraints amended to provide flood risk update
- Development requirements (a, b, d, e, f and h) have been revised and additional requirements have been inserted (i, j, k)

#### **Reason for Modification:**

- For consistency and in response to Inspector's Initial Question 17 (Ref-IL01).
- As discussed during the Hearing Session - to clarify policy position and to ensure effectiveness.

#### **Text from Submission Draft Worthing Local Plan - Indicative Capacity:**

Indicative Capacity - Integrated Health Hub

#### **Text proposed by MM20 - Indicative Capacity:**

Indicative Capacity - 7,000sqm Integrated Health Hub

#### **Text from Submission Draft Worthing Local Plan - Allocation A4 Civic Centre:**

#### **Site Constraints**

- Groundwater vulnerability – major.

- Electricity sub-station located to the south of the site.
- The Town Hall, Assembly Room and museum are listed buildings.
- There may be a risk of contamination due to the existing use and this will need investigating prior to development.

**Development Requirements - any future development proposals should:**

- a) provide a modern purpose-built healthcare facility to deliver new models of care;
- b) enhance permeability and provide an attractive and accessible pedestrian link from the site;
- c) ensure that the operational requirements of neighbouring uses are not compromised;
- d) provide high quality design with particular attention to the height and massing. Due regard should be given to the established building line to the north of the site along the frontage of Christchurch Road;
- e) be sensitive to the surrounding Conservation Areas and ensure that careful consideration is given to the protection of the neighbouring listed buildings and other heritage assets;
- f) provide sufficient parking and amenity space;
- g) comply with the requirements of policy DM17 (Energy) with regards to the delivery of district heat networks located within the identified opportunity clusters;
- h) ensure that any contaminated land issues are appropriately assessed and managed.

**Text proposed by MM20 - Allocation A4 Civic Centre:**

**Site Constraints**

- Groundwater vulnerability – major.

- Electricity sub-station located to the south of the site.
- The Town Hall, Assembly Room and museum are listed buildings.
- There may be a risk of contamination due to the existing use and this will need investigating prior to development.
- The SFRA identifies the site as being at a medium risk of flooding.

**Development Requirements - any future development proposals should:**

- a) deliver an Integrated Health Hub comprising of approximately 7,000 sqm;
- b) enhance permeability and provide an attractive and accessible pedestrian link from the site that incorporates green infrastructure;
- c) ensure that the operational requirements of neighbouring uses are not compromised;
- d) provide a high quality design with particular attention to height and massing. Ensure the scale of development, particularly on the boundaries of the site, respects the scale and established building line of adjoining properties. Due regard should be given to the established building line to the north of the site along the frontage of Christchurch Road. Ensure that development has a suitable relationship with and does not have an unacceptable impact on neighbouring residents in terms of private amenity, overlooking and that daylight and sunlight implications are appropriately managed;
- e) be sensitive to the surrounding Conservation Areas and protect nearby heritage assets and ensure no unacceptable harm is caused to them or their settings;
- f) provide sufficient parking to meet the needs of the new health facility and amenity space;
- g) comply with the requirements of policy DM17 (Energy) with regards to the delivery of district heat networks located within the identified opportunity clusters;

h) ensure that contaminated land is appropriately assessed and where necessary appropriate remediation takes place. Consider the implications of this to ensure appropriate sustainable drainage systems are provided;

i) seek to ensure the most vulnerable uses are located in the areas at lowest risk of flooding;

j) a site specific Flood Risk Assessment should consider all sources of flooding and the impacts of climate change over the lifetime of the development. It must demonstrate that any residual risk can be safely managed, development will not increase flood risk elsewhere and where possible will reduce the overall level of flood risk;

k) development proposals should ensure the protection and enhancement of existing biodiversity assets in line with Policy DM18, including the provision of biodiversity net gain. Existing high-quality trees should be retained where possible and new green infrastructure delivered that provides opportunities to link to the Borough-wide green infrastructure network.

---

## **Proposed Modification Reference: MM21**

### **Policy / Para Number: A5 Decoy Farm**

#### **Description of modification:**

- Indicative Capacity has been amended
- Site Constraints amended to provide flood risk update
- Development requirements (a, b, d, e, f and h) have been revised and additional requirements have been inserted (i, j, k)

#### **Reason for Modification:**

- Updated to provide clarity and set out the latest position
- As discussed during the Hearing Session - to clarify policy position and to ensure effectiveness.

**Text from Submission Draft Worthing Local Plan - Indicative Capacity:**

Indicative Capacity - Minimum of 18,000 sqm employment land

**Text proposed by MM21 - Indicative Capacity:**

Indicative Capacity - 14,000 sqm employment land

**Text from Submission Draft Worthing Local Plan - Paragraph 4.20-4.22:**

4.20 This developable site is located within the existing built up area boundary. The site is a former landfill site that received domestic waste active in the 1970's. Remediation of the site is due to commence at the end of 2020 including the removal of near surface soil to provide suitable levels to facilitate the delivery of a sustainable development. The delivery of new employment floorspace (industrial / storage & distribution / research & development and possibly some limited trade counters) will help to support the growth of local SMEs. In addition, this site may represent an opportunity to relocate existing businesses which could include the Stagecoach bus depot (see site A11).

4.21 The site adjoins industrial estates to the west and the Local Green Gap (within Adur District) to the east. To the south of the site is the household waste recycling site. Current access for the site is from 80 Deacon Way, which is accessed via Dominion Way.

4.22 The majority of the site is a plateau consisting of open grassland. The Teville Stream (a Water Framework Directive waterbody) runs along the western boundary and there are culverted watercourses to the east and south. Works are now underway to re-route and enhance the Teville Stream. There are also proposals to extend the Cokeham Brooks Local Wildlife Site and deliver a footpath/cycleway across the Worthing-Sompting Local Green Gap which is likely to end in the vicinity of this site.

**Text proposed by MM21 - Paragraph 4.20-4.22:**

4.20 This developable site is located within the existing built up area boundary. The site is a former landfill site that received domestic waste active in the 1970's. Remediation of the site was completed at the end of March 2021 and this included the removal of near surface soil to provide suitable levels to facilitate the delivery of a sustainable development. The delivery of new employment floorspace (industrial / storage & distribution / research & development and possibly some limited trade counters) will

help to support the growth of local SMEs. In addition, this site may represent an opportunity to relocate existing businesses which could include the Stagecoach bus depot (see site A11).

4.21 The site adjoins industrial estates to the west and the Local Green Gap (within Adur District) to the east. To the south of the site is the household waste recycling site. Current access for the site is from Dominion Way.

4.22 The majority of the site is a plateau consisting of open grassland. The Teville Stream (a Water Framework Directive waterbody) runs along the western boundary and there are culverted watercourses to the east and south. Works are now underway to re-route and enhance the Teville Stream. There are also proposals to extend the Cokeham Brooks Local Wildlife Site and deliver a footpath/cycleway across the Worthing-Sompting Local Green Gap which is likely to end in the vicinity of this site. Opportunities should be taken to deliver Biodiversity Net Gains in keeping with the location, size and scale of development as stipulated in Policy DM18.

### **Text from Submission Draft Worthing Local Plan - Allocation A5 Decoy Farm:**

#### **Site Constraints**

- The site is known to be contaminated due to its use as a former landfill. The costs on any necessary remediation, and the impact this will have on viability, must be taken into account during the consideration of any development proposal.
- In places, the site is between 2 and 4 metres above surrounding land.
- Adjacent to the Local Green Gap (within Adur District).
- The Teville Stream (partly culverted) and a number of watercourses run along the site boundaries. There are areas of Flood Zone 3 associated with these.
- Directly adjoins the boundary of the Household Waste Recycling Site which is safeguarded through the West Sussex Waste Local Plan.



**Development Requirements - any future development proposals should:**

- a) ensure that contaminated land is appropriately assessed and where necessary appropriate remediation takes place. Consider the implications of this to ensure appropriate sustainable drainage systems are provided;
- b) have careful regard to and protect and enhance the distinctive character of the Worthing-Sompting Local Green Gap (within Adur District);
- c) adopt the sequential approach so the most vulnerable uses are located in the areas at lowest risk of flooding and no built development is located in Flood Zone 3;
- d) demonstrate how flood risk will be safely managed across the lifetime of the development, taking climate change into account, and not increased elsewhere;
- e) working with Worthing Borough Council, West Sussex County Council and the respective landowner to the east, development should help to facilitate and deliver a connection to the public right of way that will be delivered in Adur District Council to provide a link to Sompting across the Local Green Gap;
- f) minimise impacts on nearby residential properties; protect the continued operation of the adjacent household waste recycling site;
- g) consultation with West Sussex and Worthing Borough Council to agree any mitigation for off site traffic impacts on the local and strategic road networks;
- h) protect the Teville Stream providing an adequate buffer between the watercourse and any potential development, and seek opportunities to enhance and restore the watercourse including removing culverts
- i) development should be supported by a scheme to eradicate invasive species present on site;
- j) ensure layout is planned to ensure future access to existing water and/or wastewater infrastructure for maintenance and upsizing purposes. Phase occupation of development to align with the delivery of sewerage infrastructure, in collaboration with the service provider.

k) maximise biodiversity value on site through wildlife friendly landscape planting and design (SUDs etc) and compensate for residual habitat loss through off-site solutions.

**Text proposed by MM21: Allocation A5 Decoy Farm**

**Site Constraints**

- The site is known to be contaminated due to its use as a former landfill. The costs of any necessary remediation, and the impact this will have on viability, must be taken into account during the consideration of any development proposal.
- In places, the site is between 2 and 4 metres above surrounding land.
- Adjacent to the Local Green Gap (within Adur District).
- The Teville Stream (partly culverted) and a number of watercourses run along the site boundaries. The SFRA identifies areas of Flood Zone 3 associated with these and that small parts of the site are at a high risk of surface and groundwater flood risk. This site was included in the SDWLP Flood Risk Sequential and Exception Test which was informed by the Level 2 SFRA (2020).
- Directly adjoins the boundary of the Household Waste Recycling Site. The West Sussex Waste Local Plan requires the safeguarding of existing waste sites from other non-waste development which may prevent or prejudice their continued operation for such purposes.

**Development Requirements - any future development proposals should:**

- a) deliver an employment scheme comprising of a minimum of 14,000 sqm employment land;
- b) ensure that contaminated land is appropriately assessed and where necessary appropriate remediation takes place. Consider the implications of this to ensure appropriate sustainable drainage systems are provided;

- c) have careful regard to and protect and enhance the distinctive character of the Worthing-Sompting Local Green Gap (within Adur District);
- d) seek to ensure the most vulnerable uses are located in the areas at lowest risk of flooding and no built development is located in Flood Zone 3;
- e) a site specific Flood Risk Assessment should demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its uses, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. This should have regard to the measures identified in the Level 2 SFRA (2020) and a SuDS scheme to provide mitigation and opportunities to achieve a reduction in overall flood risk;
- f) working with Worthing Borough Council, West Sussex County Council and the respective landowner to the east, development should help to facilitate and deliver a connection to the public right of way that will be delivered in Adur District Council to provide a link to Sompting across the Local Green Gap;
- g) minimise impacts on nearby residential properties. In line with the West Sussex Waste Local Plan proposals should not prejudice the continued safeguarding or affect the operation (and possible future reconfiguration / intensification) of the adjacent household waste recycling site;
- h) consultation with West Sussex County Council, Worthing Borough Council and National Highways to agree any mitigation for off site traffic impacts on the local and strategic road networks in particular, traffic calming and safety measures at the B223 between Sompting Road and Dominion Way;
- i) retain protect and enhance existing waterbodies providing an adequate buffer between the watercourse and any potential development, and seek opportunities to create new wetland habitats;
- j) ensure layout is planned to ensure future access to existing water and/or wastewater infrastructure for maintenance and upsizing purposes (this includes the two effluent pipelines which run along the northern boundary). Phase occupation of development to align with the delivery of sewerage infrastructure, in collaboration with the service provider.
- k) development proposals should ensure the protection and enhancement of existing biodiversity assets in line with Policy DM18, including the provision of biodiversity net gain. Existing high-quality trees should be retained where possible and new green

infrastructure delivered that provides opportunities to link to the Borough-wide green infrastructure network. Invasive species on the site should be eradicated.

---

**Proposed Modification Reference: MM22****Policy / Para Number: A6 Fulbeck Avenue****Description of modification:**

- Indicative Capacity has been amended
- Site Constraints amended to provide flood risk update
- Development requirements (a - g, i, and j) have been revised

**Reason for Modification:**

- To clarify error relating to the extent of the 'buffer'.
- To ensure the policy is effective and consistent with national policy

**Text from Submission Draft Worthing Local Plan - Indicative Capacity:**

Indicative Capacity - 120 residential unit

**Text proposed by MM22 - Indicative Capacity:**

Indicative Capacity - 152 residential unit

## **Text from Submission Draft Worthing Local Plan - Allocation A6 Fulbeck Avenue:**

### **Site Constraints**

- A band of preserved trees runs along the north east boundary of the site.
- Local Wildlife Site borders site to north-west.
- Partly within an area with a high chance of flooding from surface water and at medium risk of groundwater flooding. The site would be at risk from a breach scenario at Somerset Lake and failure of the flood storage facility to the north. These have previously caused flooding in the local area.
- Barleyfields Stream crosses the southern part of the site.
- North Barn Farm, an open windrow composting site, is located to the west.

### **Development Requirements - any future development proposals should:**

- a) deliver net gain in biodiversity and high quality green infrastructure to include the retention of mature trees, in particular some of the deciduous woodland in the northern part of the site to provide a natural habitat between the site and the West Durrington development and to limit views to the site from the National Park to the north;
- b) enhance boundary vegetation;
- c) adopt the sequential approach so the most vulnerable uses are located in the areas at lowest risk of flooding;
- d) maintain a suitable buffer to the lake and demonstrate how flood risk from all sources (including a breach scenario) will be safely managed across the lifetime of the development, taking climate change into account, and not increased elsewhere;
- e) be informed by up to date ecological information;
- f) protect the stream / watercourse and incorporate within the design of the open space to be provided as part of the development;

- g) ensure that the design and layout of this site (along with neighbouring site - the Caravan Club) avoids any potential impacts on the Local Wildlife Site;
- h) ensure a suitable relationship with the site to the west in terms of private amenity and overlooking;
- i) give consideration to the continued safeguarding of the composting site located to the west, in line with the Waste Local Plan (Policy W2);
- j) provide a new point of access from Fulbeck Avenue

**Text proposed by MM22: Allocation A6 Fulbeck Avenue**

**Site Constraints**

- A band of preserved trees runs along the north east boundary of the site.
- Local Wildlife Site borders site to north-west.
- The SFRA shows a small section of the site in the north and centre is located within Flood Zone 3b. A further northern section of the site is also located within Flood Zone 3a and parts of the site are at a high risk of surface water flooding and groundwater flooding. The SFRA also found that Somerset Lake posed a risk to the site in event of breach resulting in 38% of the site being affected on a dry day with depths up to 1.4m and on a wet day over half the site affected with depths up to 1.6m. Therefore development in this location would place additional people at risk of flooding.
- This site was included in the SDWLP Flood Risk Sequential and Exception Test which was informed by the Level 2 SFRA (2020). This concluded that both parts of the Exception Test had been satisfied for the site to be allocated. At the planning application stage Part b) of the Exception Test will need to be reapplied to take into account more detailed information about the proposed development and the specific mitigation proposed through a site specific Flood Risk Assessment.
- Barleyfields Stream crosses the southern part of the site.

- North Barn Farm, an open windrow composting site, is located to the west.

**Development Requirements - any future development proposals should:**

- a) deliver a residential scheme comprising of a minimum 152 dwellings;
- b) development proposals should ensure the protection and enhancement of existing biodiversity assets in line with Policy DM18, including the provision of biodiversity net gain. Existing mature trees and some of the deciduous woodland in the northern part of the site should be retained where possible, having regard to the recommendations in the Worthing Landscape and Ecology Study to limit views from the West Durrington development and National Park. New green infrastructure should be delivered that provides opportunities to link to the Borough-wide green infrastructure network;
- c) seek to ensure the most vulnerable uses are located in the areas at lowest risk of flooding. A site specific Flood Risk Assessment should consider all sources of flooding and demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its uses, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. This should have regard to the measures identified in the Level 2 SFRA (2020) and a SuDS scheme to provide mitigation and opportunities to achieve a reduction in overall flood risk;
- d) retain, protect and enhance existing waterbodies and seek opportunities to create new wetland habitats. Incorporate within the design of the open space to be provided as part of the development and maintain a suitable buffer to the lake;
- e) ensure that the design and layout of this site (along with neighbouring site - the Caravan Club) safeguards and has regard to opportunities for enhancement of the Local Wildlife Site;
- f) ensure a suitable relationship with the site to the west in terms of private amenity and overlooking;
- g) provide a new point of access from Fulbeck Avenue and provide an appropriate level of contribution towards highway capacity improvements at the A259 / A2032 Goring Crossways junction.

---

**Proposed Modification Reference: MM23****Policy / Para Number: A7 Grafton****Description of modification:**

- Site Constraints amended to provide flood risk update
- Development requirements (a, b, c, f, h, and i) have been revised and new requirements (j and k) have been added.

**Reason for Modification:**

- As discussed during the Hearing Session - to provide updates, avoid duplication and to ensure effectiveness.

**Text from Submission Draft Worthing Local Plan - Allocation A7 Grafton:****Site Constraints**

- The majority of the site is in Flood Zone 3.
- Foul & surface water drains cross the site and wastewater and surface water pumping stations are currently located on the site.
- The surroundings include several Conservation Areas, and the Lido (a Grade II Listed Building) is opposite the site on the seafront.
- The multi-storey car park currently provides space for 430 cars.
- There are complex access rights to neighbouring retail and residential areas.
- Development proposals will need to address 'Right of Light' issues with neighbouring properties.



**Development Requirements - any future development proposals should:**

- a) provide a mix of high quality residential, retail and leisure uses and amenity space;
- b) adopt the sequential approach so the most vulnerable uses are located in the areas at lowest risk of flooding;
- c) demonstrate how flood risk will be safely managed across the lifetime of the development, taking climate change into account, and not increased elsewhere;
- d) reposition and maintain the network of service connections to existing properties (surface and foul water drainage and pumping station) and provide to new-build;
- e) ensure that a suitable gap is provided between the pumping station and any sensitive development (such as housing);
- f) provide a high quality public realm that enhances the town centre and provides an attractive setting to the historic environment, including the Grade II Listed Lido and surrounding Conservation Areas;
- g) address access arrangements for all users/ to all uses; this might include temporary arrangements during construction as well as long term solutions;
- h) create a new route linking the seafront and primary shopping area in a coherent and attractive way;
- i) ensure that daylight and sunlight implications are appropriately managed.

**Text proposed by MM23: Allocation A7 Grafton**

**Site Constraints**

- The majority of the site is in Flood Zone 3. The site is therefore at a high risk of coastal flooding and the SFRA states that climate change will have a significant impact on this site with Flood Zone 3 covering the whole site in the future. Therefore development in this location would place additional people at risk of flooding. This site was included in the SDWLP Flood

Risk Sequential and Exception Test which was informed by the Level 2 SFRA (2020). This concluded that both parts of the Exception Test had been satisfied for the site to be allocated. At the planning application stage Part b) of the Exception Test will need to be reapplied to take into account more detailed information about the proposed development and the specific mitigation proposed through a site specific Flood Risk Assessment.

- Foul & surface water drains cross the site and wastewater and surface water pumping stations are currently located on the site.
- The surroundings include several Conservation Areas, and the Lido (a Grade II Listed Building) is opposite the site on the seafront.
- There are complex access rights to neighbouring retail and residential areas.
- Development proposals will need to address 'Right of Light' issues with neighbouring properties.

**Development Requirements - any future development proposals should:**

- a) deliver a residential and employment scheme comprising of a minimum of 150 residential units and approximately 2,500 sqm commercial;
- b) seek to ensure the most vulnerable uses are located in the areas at lowest risk of flooding;
- c) a site specific Flood Risk Assessment should consider all sources of flooding and demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its uses, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. This should have regard to the measures identified in the Level 2 SFRA (2020) and a SuDS scheme to provide mitigation and opportunities to achieve a reduction in overall flood risk;
- d) reposition and maintain the network of service connections to existing properties (surface and foul water drainage and pumping station) and provide to new-build;
- e) ensure that a suitable gap is provided between the pumping station and any sensitive development (such as housing);

- f) provide a high quality public realm that enhances the town centre and protects nearby heritage assets and ensures no unacceptable harm is caused to them or their settings; including the Grade II Listed Lido and surrounding Conservation Areas;
- g) address access arrangements for all users/ to all uses; this might include temporary arrangements during construction as well as long term solutions;
- h) enhance permeability and provide an attractive and accessible pedestrian link that incorporates green infrastructure linking the seafront and primary shopping area in a coherent and attractive way;
- i) provide a high quality design with particular attention to height and massing. Ensure the scale of development, particularly on the boundaries of the site, respects the scale and established building line of adjoining properties. Ensure that development has a suitable relationship with and does not have an unacceptable impact on neighbouring residents in terms of private amenity, overlooking and that daylight and sunlight implications are appropriately managed.
- j) ensure that contaminated land is appropriately assessed and where necessary appropriate remediation takes place. Consider the implications of this to ensure appropriate sustainable drainage systems are provided;
- k) development proposals should ensure the protection and enhancement of existing biodiversity assets in line with Policy DM18, including the provision of biodiversity net gain. Existing high-quality trees should be retained where possible and new green infrastructure delivered that provides opportunities to link to the Borough-wide green infrastructure network.

---

## **Proposed Modification Reference: MM24**

### **Policy / Para Number: A8 HMRC Offices**

#### **Description of modification:**

- Site Constraints amended to provide flood risk update

- Development requirements (a, b, c, e, and g) have been revised and new requirements (i, j and k) have been added.

**Reason for Modification:**

- As discussed during the Hearing Session - to ensure effectiveness.

**Text from Submission Draft Worthing Local Plan - Allocation A8 HMRC Offices:**

**Site Constraints**

- Low to moderate risk of contamination / pollution.
- Some areas of mature vegetation and trees lie within the site and along parts of the site boundary.

**Development Requirements - any future development proposals should:**

- a) deliver of mix of residential and employment uses with emphasis on encouraging the retention of Durrington Bridge House (to the east) and the delivery of employment uses on the western section of the site;
- b) ensure that any contaminated land issues are appropriately assessed and managed;
- c) retain high quality trees in and around the site;
- d) mitigate any impacts of noise and vibration resulting from the presence of the railway line to the north of the site;
- e) ensure that the development does not have an unacceptable impact on the amenity of neighbouring residents;
- f) not prevent (or negatively impact) the potential for development on land lying adjacent to the west of the site (Martlets Way);
- g) seek to improve access to and from Durrington Station;
- h) provide appropriate junction improvements at Barrington Rd / Shaftesbury Avenue.

## **Text proposed by MM24: Allocation A8 HMRC Offices**

### **Site Constraints**

- Low to moderate risk of contamination / pollution.
- Some areas of mature vegetation and trees lie within the site and along parts of the site boundary.
- The SFRA identifies the site as being at a medium risk of flooding.

### **Development Requirements - any future development proposals should:**

- a) deliver a residential scheme comprising of a minimum of 250 residential units, provision of care home / sheltered accommodation and employment uses with emphasis on encouraging the retention of Durrington Bridge House (to the east);
- b) ensure that any contaminated land issues are appropriately assessed and where necessary appropriate remediation takes place. Consider the implications of this to ensure appropriate sustainable drainage systems are provided;
- c) development proposals should ensure the protection and enhancement of existing biodiversity assets in line with Policy DM18, including the provision of biodiversity net gain. Existing high-quality trees should be retained where possible and new green infrastructure delivered that provides opportunities to link to the Borough-wide green infrastructure network;
- d) mitigate any impacts of noise and vibration resulting from the presence of the railway line to the north of the site;
- e) provide a high quality design with particular attention to height and massing. Ensure the scale of development, particularly on the boundaries of the site, respects the scale and established building line of adjoining properties. Ensure that development has a suitable relationship with and does not have an unacceptable impact on neighbouring residents in terms of private amenity, overlooking and that daylight and sunlight implications are appropriately managed;
- f) not prevent (or negatively impact) the potential for development on land lying adjacent to the west of the site (Martlets Way);

- g) enhance permeability and provide an attractive and accessible pedestrian link that incorporates green infrastructure from the site as well as seeking to improve access to and from Durrington Station;
- h) provide appropriate junction improvements at Barrington Rd / Shaftesbury Avenue;
- i) provide an appropriate level of contribution towards highway capacity improvements at the A259 / A2032 Goring Crossways junction;
- j) seek to ensure the most vulnerable uses are located in the areas at lowest risk of flooding;
- k) site specific Flood Risk Assessment should consider all sources of flooding and the impacts of climate change over the lifetime of the development. It must demonstrate that any residual risk can be safely managed, development will not increase flood risk elsewhere and where possible will reduce the overall level of flood risk.

---

### **Proposed Modification Reference: MM25**

### **Policy / Para Number: A9 Lyndhurst Road**

#### **Description of modification:**

- Expected delivery date revised
- Site Constraints amended to provide flood risk update and heritage
- Development requirements (a, b, c and d) have been revised and new requirements (g, h, i and j) have been added.

#### **Reason for Modification:**

- To reflect progress made on the site and to ensure that the allocation is clear and effective.
- As discussed during the Hearing Session and to ensure effectiveness.

**Text from Submission Draft Worthing Local Plan - Expected Delivery Date:**

- Expected Delivery dates - 6+ years to 0-5 years

**Expected Delivery Date Proposed by MM25:**

- Expected Delivery dates - 0-5 years

**Text from Submission Draft Worthing Local Plan - Allocation A9 Lyndhurst Road:**

**Site Constraints**

- Significant levels of contaminated land.
- Within an area containing recorded archaeological remains.
- Evidence of potential ecological constraints.
- Potential access issues.

**Development Requirements - any future development proposals should:**

- a) provide a high quality residential development;
- b) undertake detailed investigations of the contamination to assess the level of remediation required;
- c) deliver a surface water drainage scheme that ensures that surface water is not discharged through contaminated soils;
- d) undertake an assessment of the archaeological remains;
- e) undertake an extensive phase 1 habitat survey and desktop study and provide mitigation as appropriate;

- f) address provision for suitable access/egress on Park Road and Lyndhurst Road;
- g) enhance permeability and provide an attractive and accessible pedestrian link from the site to the High Street and town centre – this should include consideration of an improved footway / cycleway along the northern boundary.

**Text proposed by MM25: Allocation A9 Lyndhurst Road**

**Site Constraints**

- Significant levels of contaminated land.
- Within an area containing recorded archaeological remains.
- Evidence of potential ecological constraints.
- Potential access issues.
- The SFRA identifies the site as being at a medium risk of flooding.
- Conservation Areas lie in close proximity to the site.

**Development Requirements - any future development proposals should:**

- a) deliver a residential scheme comprising of a minimum 150 dwellings;
- b) ensure that contaminated land is appropriately assessed and where necessary appropriate remediation takes place. Consider the implications of this to ensure appropriate sustainable drainage systems are provided;
- c) undertake an assessment of the archaeological remains and ensure that any archaeological assessment requirements are implemented;



- d) development proposals should ensure the protection and enhancement of existing biodiversity assets in line with Policy DM18, including the provision of biodiversity net gain. Existing high-quality trees should be retained where possible and new green infrastructure delivered that provides opportunities to link to the Borough-wide green infrastructure network;
- e) address provision for suitable access/egress on Park Road and Lyndhurst Road;
- f) enhance permeability and provide an attractive and accessible pedestrian link from the site to the High Street and town centre – this should include consideration of an improved footway / cycleway along the northern boundary.
- g) protect nearby heritage assets and ensure no unacceptable harm is caused to them or their settings;
- h) seek to ensure the most vulnerable uses are located in the areas at lowest risk of flooding;
- i) a site specific Flood Risk Assessment should consider all sources of flooding and the impacts of climate change over the lifetime of the development. It must demonstrate that any residual risk can be safely managed, development will not increase flood risk elsewhere and where possible will reduce the overall level of flood risk;
- j) provide a high quality design with particular attention to height and massing. Ensure the scale of development, particularly on the boundaries of the site, respects the scale and established building line of adjoining properties. Ensure that development has a suitable relationship with and does not have an unacceptable impact on neighbouring residents in terms of private amenity, overlooking and that daylight and sunlight implications are appropriately managed.

---

### **Proposed Modification Reference: MM26**

### **Policy / Para Number: A10 Martlets Way**

#### **Description of modification:**

- Indicative Capacity has been amended
- Site Constraints amended to provide flood risk update

- Development requirements (a, b, d, e, and g) have been revised and new requirements (h, i and j) have been added

**Reason for Modification:**

- To ensure the policy is effective and consistent with national policy

**Text from Submission Draft Worthing Local Plan - Indicative Capacity:**

Indicative Capacity - 10,000 sqm employment

**Text proposed by MM26 - Indicative Capacity:**

Indicative Capacity - 10,000 sqm employment & 28 residential units

**Text from Submission Draft Worthing Local Plan - Allocation A10 martlets Way:**

**Site Constraints**

- Current access arrangements from the west will require some improvement.
- There is a risk with piecemeal development on parts of the site, although separate applications may be acceptable if supported by an appropriate planning strategy.
- Previous site uses indicate likely contamination.
- A line of mature established Ilex trees crosses the site.
- Close proximity of residential development may affect any employment layout with a need for adequate screening.

**Development Requirements - any future development proposals should:**

a) provide employment development accessed from the west;

- b) ensure that the development does not have an unacceptable impact on the amenity of neighbouring residents;
- c) promote a travel plan to improve the accessibility and sustainability of the site;
- d) ensure that any contaminated land issues are appropriately assessed and managed;
- e) protect mature Ilex oak trees that separate the former gas holder site from the former sewage treatment works (subject to appropriate assessment work);
- f) ensure that the layout and access arrangements for any development does not constrain or prevent the ability for development to come forward elsewhere within the site as a whole;
- g) provide an element of residential development accessed from the east (HMRC A8) but only if it can facilitate the delivery of employment floorspace at Martlets Way and provide for the former gasholder site to be brought forward.

**Text proposed by MM26: Allocation A10 Martlets Way**

**Site Constraints**

- Current access arrangements from the west will require some improvement.
- There is a risk with piecemeal development on parts of the site, although separate applications may be acceptable if supported by an appropriate planning strategy.
- Previous site uses indicate likely contamination.
- A line of mature established Ilex trees crosses the site.
- Close proximity of residential development may affect any employment layout with a need for adequate screening.
- The SFRA identifies the site as being at a medium risk of flooding.

**Development Requirements - any future development proposals should:**

- a) deliver a residential and employment scheme comprising of a minimum of 28 residential units and approximately 10,000 sqm employment;
- b) ensure that the development does not have an unacceptable impact on the amenity of neighbouring residents. Provide a high quality design with particular attention to height and massing. Ensure the scale of development, particularly on the boundaries of the site, respects the scale and established building line of adjoining properties. Ensure that development has a suitable relationship with and does not have an unacceptable impact on neighbouring residents in terms of private amenity, overlooking and that daylight and sunlight implications are appropriately managed;
- c) promote a travel plan to improve the accessibility and sustainability of the site;
- d) ensure that any contaminated land issue is appropriately assessed and where necessary appropriate remediation takes place. Consider the implications of this to ensure appropriate sustainable drainage systems are provided;
- e) development proposals should ensure the protection and enhancement of existing biodiversity assets in line with Policy DM18, including the provision of biodiversity net gain. Protect mature Ilex oak trees that separate the former gas holder site from the former sewage treatment works (subject to appropriate assessment work). New green infrastructure should be delivered that provides opportunities to link to the Borough-wide green infrastructure network;
- f) ensure that the layout and access arrangements for any development does not constrain or prevent the ability for development to come forward elsewhere within the site as a whole;
- g) provide an element of residential development accessed from the east (HMRC A8) but only if it can facilitate the delivery of employment floorspace at Martlets Way accessed from the west and provide for the former gasholder site to be brought forward.
- h) a site specific Flood Risk Assessment should consider all sources of flooding and the impacts of climate change over the lifetime of the development. It must demonstrate that any residual risk can be safely managed, development will not increase flood risk elsewhere and where possible will reduce the overall level of flood risk;

- i) seek to ensure the most vulnerable uses are located in the areas at lowest risk of flooding;
- j) provide an appropriate level of contribution towards highway safety improvements at the A259 Goring Way / Goring Street junction and highway capacity improvements at the A259 / A2032 Goring Crossways junction.

---

## **Proposed Modification Reference: MM26**

### **Policy / Para Number: A11 Stagecoach**

#### **Description of modification:**

- Indicative Capacity has been amended
- Site Constraints amended to provide flood risk update
- Development requirements (a - f, h, j and k) have been revised and new requirement (k) has been added

#### **Reason for Modification:**

- To ensure the policy is effective and consistent with national policy
- For consistency
- In response to SDWLP-59 (Environment Agency).

#### **Text from Submission Draft Worthing Local Plan - Indicative Capacity:**

Indicative Capacity - 60 residential units & 2,000sqm Commercial / Leisure

#### **Text proposed by MM27 - Indicative Capacity:**

Indicative Capacity - 60 residential units & 2,000sqm Commercial

#### **Text from Submission Draft Worthing Local Plan - Allocation A11 Stagecoach:**

## **Site Constraints**

- Part of the site is within Flood Zone 2 and parts lie within Zone 3.
- There may be a risk of contamination on this site due to the existing use and this will need investigating prior to development.
- The whole site is bounded by Conservation Areas with a small part situated within the Steyne Garden Conservation Area.
- The Dome Cinema is a Grade II\* listed building. Other listed buildings in close proximity include the residential terrace of Bedford Row, the Chatsworth Hotel, houses fronting Steyne Gardens and Stanford Cottage.
- Within an area containing recorded archaeological remains.
- There are a number of preserved trees within and adjacent to the site.

## **Development Requirements - any future development proposals should:**

- a) provide for a mixed development of residential and commercial uses (e.g. retail (comparison goods), cultural, leisure) that provides vibrancy and helps to integrate the town centre and seafront;
- b) use the sequential approach to site layout to ensure the most vulnerable types of development are located in the areas of lowest flood risk;
- c) manage flood risks so that development is safe across its lifetime without increasing flood risk elsewhere;
- d) consider the risks posed by contaminated land to ensure the site is safe for future occupants and that development does not pose a risk to water quality;
- e) ensure that any contaminated land issues are appropriately assessed and managed;

- f) be sensitive to the surrounding Conservation Areas, listed buildings and historic rights of way and ensure that the design of any new development helps to enhance their significance and setting;
- g) consider opportunities to enhance the Conservation Area by incorporating land in Bedford Row to the west (currently used for parking);
- h) enhance permeability and provide an attractive and accessible pedestrian link from Marine Parade to Warwick Street;
- i) consider whether there is there is an opportunity to re-open the historic twitten;
- j) undertake an assessment of the archaeological remains;
- k) incorporate the existing protected trees into any proposed design.

**Text proposed by MM27: Allocation A11 Stagecoach**

**Site Constraints**

- Parts of the site lie within Flood Zone 3 the site is therefore at a high risk of coastal flooding and the SFRA states that climate change will have a significant impact on this site with Flood Zone 3 covering the whole site in the future. Therefore development in this location would place additional people at risk of flooding. This site was included in the SDWLP Flood Risk Sequential and Exception Test which was informed by the Level 2 SFRA (2020). This concluded that both parts of the Exception Test had been satisfied for the site to be allocated. At the planning application stage Part b) of the Exception Test will need to be reapplied to take into account more detailed information about the proposed development and the specific mitigation proposed through a site specific Flood Risk Assessment.
- There may be a risk of contamination on this site due to the existing use and this will need investigating prior to development.
- The whole site is bounded by Conservation Areas with a small part situated within the Steyne Garden Conservation Area.

- The Dome Cinema is a Grade II\* listed building. Other listed buildings in close proximity include the residential terrace of Bedford Row, the Chatsworth Hotel, houses fronting Steyne Gardens and Stanford Cottage.
- Within an area containing recorded archaeological remains.
- There are a number of preserved trees within and adjacent to the site.

Development Requirements - any future development proposals should:

- a) deliver a residential and employment scheme comprising of a minimum of 60 residential units and approximately 2,000 sqm commercial;
- b) seek to ensure the most vulnerable uses are located in the areas at lowest risk of flooding;
- c) a site specific Flood Risk Assessment should consider all sources of flooding and demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its uses, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. This should have regard to the measures identified in the Level 2 SFRA (2020) and a SuDS scheme to provide mitigation and opportunities to achieve a reduction in overall flood risk;
- d) ensure that any contaminated land issue is appropriately assessed and where necessary appropriate remediation takes place. Consider the implications of this to ensure appropriate sustainable drainage systems are provided;
- e) protect nearby heritage assets and ensure no unacceptable harm is caused to them or their settings;
- f) consider opportunities to enhance the Conservation Area by incorporating land in Bedford Row to the west (currently used for parking);
- g) enhance permeability and provide an attractive and accessible pedestrian link (that incorporates green infrastructure) from Marine Parade to Warwick Street;
- h) consider whether there is there is an opportunity to re-open the historic twitten;



i) undertake an assessment of the archaeological remains and ensure that any archaeological assessment requirements are implemented;

j) development proposals should ensure the protection and enhancement of existing biodiversity assets in line with Policy DM18, including the provision of biodiversity net gain. Existing high-quality trees should be retained where possible and new green infrastructure delivered that provides opportunities to link to the Borough-wide green infrastructure network;

k) provide a high quality design with particular attention to height and massing. Ensure the scale of development, particularly on the boundaries of the site, respects the scale and established building line of adjoining properties. Ensure that development has a suitable relationship with and does not have an unacceptable impact on neighbouring residents in terms of private amenity, overlooking and that daylight and sunlight implications are appropriately managed.

---

## **Proposed Modification Reference: MM28**

### **Policy / Para Number: A12 Teville Gate**

#### **Description of modification:**

- Site Constraints amended to provide flood risk update
- Development requirements (a - e) have been revised and new requirements (g, h, i and j) have been added

#### **Reason for Modification:**

- To ensure the policy is effective and consistent with national policy
- In response to SDWLP-59 (Environment Agency).

## **Text from Submission Draft Worthing Local Plan - Allocation A12 Teville Gate:**

### Site Constraints

- There are areas of potentially contaminated land within the site.
- The site is in an area with a high chance of surface water flooding and is at high risk of groundwater flooding.
- Grade II Listed Worthing Railway Station site and the Grand Victorian Hotel are in close proximity to the site.
- There are underground utilities services and a culverted watercourse running through the site.

Development Requirements - any future development proposals should:

- a) deliver a mixed use scheme with a minimum of 250 homes, retail and leisure uses, commercial uses and replacement public car parking spaces;
- b) ensure that any contaminated land issues are appropriately assessed, remediated and managed;
- c) ensure the development is made safe from surface and groundwater flooding taking climate change into account; and incorporate appropriate Sustainable Urban Drainage Systems to ensure flood risk is not increased elsewhere and where possible reduce flooding locally whilst protecting water quality including during flood events;
- d) protect and enhance nearby heritage assets and ensure no significant harm is caused to them or their settings;
- e) provide a high quality public realm with cycle and pedestrian links from the station to the town centre, and under the A24 to Morrisons, having regard to the Worthing Public Realm Study;
- f) protect the amenity of future occupants from unacceptable levels of rail and road noise.

## **Text proposed by MM28: Allocation A12 Teville Gate**

### **Site Constraints**

- There are areas of potentially contaminated land within the site.
- The SFRA shows one third of the site is at a high risk of surface water flooding. This site was included in the SDWLP Flood Risk Sequential and Exception Test which was informed by the Level 2 SFRA (2020).
- Grade II Listed Worthing Railway Station site and the Grand Victorian Hotel are in close proximity to the site.
- There are underground utilities services and a culverted watercourse running through the site.

### **Development Requirements - any future development proposals should:**

- a) deliver a mixed use scheme comprising of a minimum of 250 residential units and approximately 4,000 sqm commercial;
- b) ensure that any contaminated land issue is appropriately assessed and where necessary appropriate remediation takes place. Consider the implications of this to ensure appropriate sustainable drainage systems are provided;
- c) a site specific Flood Risk Assessment should demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its uses, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. This should have regard to the measures identified in the Level 2 SFRA (2020) and a SuDS scheme to provide mitigation and opportunities to achieve a reduction in overall flood risk and protect water quality;
- d) protect nearby heritage assets and ensure no significant harm is caused to them or their settings;
- e) enhance permeability and provide a high quality public realm with cycle and pedestrian links (that incorporates green infrastructure) from the station to the town centre, and under the A24 to Morrisons, having regard to the Worthing Public Realm Study;
- f) protect the amenity of future occupants from unacceptable levels of rail and road noise;

- g) any development around the station area should take into account the culverted watercourse that runs through the site and has historically resulted in flooding. The course and capacity of this should be taken into account. Opportunities where appropriate to de-culvert and create a biodiversity net gain should be sought;
- h) seek to ensure the most vulnerable uses are located in the areas at lowest risk of flooding;
- i) provide a high quality design with particular attention to height and massing. Ensure the scale of development, particularly on the boundaries of the site, respects the scale and established building line of adjoining properties. Ensure that development has a suitable relationship with and does not have an unacceptable impact on neighbouring residents in terms of private amenity, overlooking and that daylight and sunlight implications are appropriately managed;
- j) development proposals should ensure the protection and enhancement of existing biodiversity assets in line with Policy DM18, including the provision of biodiversity net gain. Existing high-quality trees should be retained where possible and new green infrastructure delivered that provides opportunities to link to the Borough-wide green infrastructure network.
-

## **Proposed Modification Reference: MM29**

### **Policy / Para Number: A13 Titnore Lane**

#### **Description of modification:**

- Proposed site allocation A13 has now been deleted from the Plan.

#### **Reason for Modification:**

- The Inspectors Post Hearing Advice Letter (IL07) concluded that the risk of adverse impacts from developing the site would significantly and demonstrably outweigh the benefits. Consequently, the allocation should be deleted with the necessary changes made to the housing requirement, housing trajectory and Policies Map.
  - The allocation is not justified or consistent with national policy.
- 

## **Proposed Modification Reference: MM30**

### **Policy / Para Number: A14 Union Place**

#### **Description of modification:**

- Indicative Capacity has been amended
- Site Constraints amended to provide flood risk update
- Development requirements (a, b, d, f, g and i) have been revised and new requirements (l and m) have been added

**Reason for Modification:**

- To ensure the policy is effective and consistent with national policy

**Text from Submission Draft Worthing Local Plan - Indicative Capacity:**

Indicative Capacity - 150 residential units and 700 sqm leisure / commercial

**Text proposed by MM30 - Indicative Capacity:**

Indicative Capacity - 150 residential units & 700 sqm commercial

**Text from Submission Draft Worthing Local Plan - Allocation A11 Stagecoach:****Site Constraints**

- Includes small areas with a medium or high chance of surface water flooding.
- Includes large areas of potentially contaminated land – below ground conditions currently unknown.
- Overlooking and 'Right of Light' issues associated with surrounding buildings.
- Chapel Road Conservation Area (CA) lies west of the site, and the development would most likely be visible from Conservation Areas in the surrounding area.
- There are a number of Grade II listed buildings in close proximity to the north and east of this site, and an Archaeological Notification Area lies to the west of the High Street.
- Development of the site will need to take the amenity of nearby occupiers into account and address capacity for power, water and drainage created by the new scheme.

### **Development Requirements - any future development proposals should:**

- a) create a landmark development in the heart of the town centre which creates a sense of place and provides an attractive setting to the historic environment;
- b) ensure that careful consideration is given to the protection of the listed buildings and other heritage assets that are in close proximity to this site;
- c) provide a mix of uses including homes and commercial floorspace with the potential for restaurants and leisure uses;
- d) provide a high quality public realm and generate new retail / leisure circuits connecting to Chapel Road, High Street and South Street;
- e) introduce active usages along Union Place and the High Street (employing natural surveillance to design out crime);
- f) ensure that any contaminated land issues are appropriately assessed and managed;
- g) manage daylight and sunlight implications appropriately;
- h) provide an appropriate number of replacement car parking spaces;
- i) ensure that any archaeological assessment requirements are met;
- j) comply with the requirements of policy DM17 (Energy) with regards to the delivery of district heat networks located within the identified opportunity clusters.

### **Text proposed by MM30: Allocation A14 Union Place**

#### **Site Constraints**

- Includes small areas with a medium or high chance of surface water flooding.
- Includes large areas of potentially contaminated land – below ground conditions currently unknown.

- Overlooking and 'Right of Light' issues associated with surrounding buildings.
- Chapel Road Conservation Area (CA) lies west of the site, and the development would most likely be visible from Conservation Areas in the surrounding area.
- There are a number of Grade II listed buildings in close proximity to the north and east of this site, and an Archaeological Notification Area lies to the west of the High Street.
- Development of the site will need to take the amenity of nearby occupiers into account and address capacity for power, water and drainage created by the new scheme.
- The SFRA identifies the site as being at a medium risk of flooding.

**Development Requirements - any future development proposals should:**

- a) deliver a residential and employment scheme comprising of a minimum of 150 residential units and approximately 700 sqm leisure / commercial;
- b) create a landmark development in the heart of the town centre which creates a sense of place and provides an attractive setting to the historic environment;
- c) protect nearby heritage assets and ensure no unacceptable harm is caused to them or their settings;
- d) provide a mix of uses including homes and commercial floorspace with the potential for restaurants and leisure uses;
- e) enhance permeability and provide a high quality public realm (that incorporates green infrastructure) and generate new retail / leisure circuits connecting to Chapel Road, High Street and South Street;
- f) introduce active usages along Union Place and the High Street (employing natural surveillance to design out crime);



- g) ensure that any contaminated land issue is appropriately assessed and where necessary appropriate remediation takes place. Consider the implications of this to ensure appropriate sustainable drainage systems are provided;
- h) provide a high quality design with particular attention to height and massing. Ensure the scale of development, particularly on the boundaries of the site, respects the scale and established building line of adjoining properties. Ensure that development has a suitable relationship with and does not have an unacceptable impact on neighbouring residents in terms of private amenity, overlooking and that daylight and sunlight implications are appropriately managed;
- i) provide an appropriate number of replacement car parking spaces;
- j) undertake an assessment of the archaeological remains and ensure that any archaeological assessment requirements are implemented;
- k) comply with the requirements of policy DM17 (Energy) with regards to the delivery of district heat networks located within the identified opportunity clusters;
- l) seek to ensure the most vulnerable uses are located in the areas at lowest risk of flooding;
- m) a site specific Flood Risk Assessment should consider all sources of flooding and the impacts of climate change over the lifetime of the development. It must demonstrate that any residual risk can be safely managed, development will not increase flood risk elsewhere and where possible will reduce the overall level of flood risk.

---

## **Proposed Modification Reference: MM31**

### **Para / Policy: A15 Upper Brighton Road**

#### **Description of modification:**

- Supporting text updated to provide latest position with regards to the playing field
- Site constraints updated to provide update on flood risk
- Development requirements (a - g, l and n) have been revised and new requirements (m, n and o) have been added.

**Reason for Modification:**

- As discussed during the Hearing Session - to clarify policy position and to ensure effectiveness.
- Update to highlight recent changes and in response to MIQ-133..

**Text from Submission Draft Worthing Local Plan - Paragraph 4.43:**

4.43 The site adjoins housing to the west and south beyond which (to the south) lies a large industrial area. Bramber Primary School is located adjacent to the south west and an area of land within the site is reserved for an expansion of the school to provide a playing field. The boundary with Adur District Council runs along the eastern edge of the site and a small linear settlement designated as the Sompting Village Conservation Area lies adjacent to the north east.

**Text proposed by MM31 - Paragraph 4.43:**

4.43 The site adjoins housing to the west and south beyond which (to the south) lies a large industrial area. Bramber Primary School (and playing field) is located adjacent to the south west. The boundary with Adur District Council runs along the eastern edge of the site and a small linear settlement designated as the Sompting Village Conservation Area lies adjacent to the north east.

**Text from Submission Draft Worthing Local Plan - Allocation A15 Upper Brighton Road:****Site Constraints**

- Cabling (and associated easement strip) to serve Rampion offshore windfarm crosses the site diagonally and this restricts development in the eastern part of both land parcels.
- In close proximity to the South Downs National Park boundary.
- Sompting Conservation Area and Upton Farm House (Grade II listed building) lie close to the eastern boundary.

**Development Requirements - any future development proposals should:**

- a) avoid coalescence with development to the east and ensure that development is located to the west of the easement strip for the windfarm cable (a small parcel of land to the east of the easement strip is designated as part of the Local Green Gap);
- b) deliver biodiversity net gains, provide high quality green infrastructure and enhance & strengthen hedgerows / linear scrub habitats along existing boundaries;
- c) be informed by up to date ecological information and create a range of habitats with high wildlife interest within areas of open space;
- d) integrate trees reflecting the landscape character of the site to mitigate visual impact from the South Downs National Park;
- e) retain and enhance existing waterbodies and/or create new wetland habitats;
- f) provide additional tree planting along boundaries;
- g) protect the setting of both the listed building and the Sompting Village Conservation Area;
- h) provide a safe and suitable vehicular access from Upper Brighton Road;
- i) help to support and not prejudice the wider aspirations of the Sompting Estate (within Adur District as well as Worthing) to develop necessary infrastructure for diverse local food production and for local supply;
- j) ensure that agricultural access (from A27 through Lower Lambleys Lane and across Upper Brighton Road into Church Farm) is maintained, and where possible, enhanced;
- k) provide non-motorised user access from the southern portion of site onto Bramber Road and improved non-motorised user facilities along Upper Brighton Road.
- l) Respond to the requirements of the Worthing Air Quality Action Plan and deliver a package of sustainability measures to mitigate the impact of development. EV charge points (with a power output of at least 7kW) should be provided for all residential units, fitted ready for first occupation.

#### Parcel A

- m) strengthen eastern boundary vegetation;
- n) provide playing field for Bramber First School;
- o) protect, or provide suitable diversion for, public footpath (3135) which should be enhanced to include improvements to surface quality and widening to allow for cycling;

#### Parcel B

- p) provide a buffer of open space and then low density housing along the northern edge of the site nearest the A27 / National Park;
- q) maintain separation between the eastern edge of Worthing and the more rural in character settlement to the east by limiting development to the western half of the site.

#### **Text proposed by MM31: Allocation A15 Upper Brighton Road**

#### **Site Constraints**

- Cabling (and associated easement strip) to serve Rampion offshore windfarm crosses the site diagonally and this restricts development in the eastern part of both land parcels.
- In close proximity to the South Downs National Park boundary.
- Sompting Conservation Area and Upton Farm House (Grade II listed building) lie close to the eastern boundary.
- The SFRA identifies the site as being at a high risk of flooding.

Development Requirements - any future development proposals should:

- a) deliver a residential scheme comprising of a minimum of 123 residential units with Parcel A providing 105 residential units and Parcel B providing 18 residential units;
- b) avoid coalescence with development to the east and ensure that development is located to the west of the easement strip for the windfarm cable (a small parcel of land to the east of the easement strip is designated as part of the Local Green Gap). Protect and enhance the distinctive character of the Local Green Gap;
- c) development proposals should ensure the protection and enhancement of existing biodiversity assets in line with Policy DM18, including the provision of biodiversity net gain. Enhance and strengthen trees, hedgerows / linear scrub habitats along existing boundaries. New green infrastructure should be delivered that provides opportunities to link to the Borough-wide green infrastructure network;
- d) be informed by up to date ecological information and create a range of habitats with high wildlife interest within areas of open space;
- e) conserve and enhance the setting of the SDNP and mitigate the visual impact of development (including the effects of artificial lighting) with consideration given to the transition into the Park and views to/from the Park having regard to the recommendations in the Worthing Landscape and Ecology Study;
- f) retain, protect and enhance existing waterbodies including the winterbourne chalk stream and seek opportunities to /or create new wetland habitats;
- g) protect nearby heritage assets (including Sompting Village Conservation Area) and ensure no unacceptable harm is caused to them or their settings;
- h) provide a safe and suitable vehicular access from Upper Brighton Road;
- i) help to support and not prejudice the wider aspirations of the Sompting Estate (within Adur District as well as Worthing) to develop necessary infrastructure for diverse local food production and for local supply;
- j) ensure that agricultural access (from A27 through Lower Lambleys Lane and across Upper Brighton Road into Church Farm) is maintained, and where possible, enhanced;

k) provide non-motorised user access from the southern portion of site onto Bramber Road and improved non-motorised user facilities along Upper Brighton Road.

l) Respond to the requirements of the Worthing Air Quality Action Plan and deliver a package of sustainability measures to mitigate the impact of development. This should include a commitment to promote a travel plan to improve the accessibility and sustainability of the site. EV charge points (with a power output of at least 7kW) should be provided for all residential units, fitted ready for first occupation.

m) seek to ensure the most vulnerable uses are located in the areas at lowest risk of flooding;

n) a site specific Flood Risk Assessment should consider all sources of flooding and demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its uses, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. This should have regard to the measures identified in the Level 2 SFRA (2020) and a SuDS scheme to provide mitigation and opportunities to achieve a reduction in overall flood risk;

o) provide a high quality design with particular attention to height and massing. Ensure the scale of development, particularly on the boundaries of the site, respects the scale and established building line of adjoining properties. Ensure that development has a suitable relationship with and does not have an unacceptable impact on neighbouring residents in terms of private amenity, overlooking and that daylight and sunlight implications are appropriately managed.

#### Parcel A

p) strengthen eastern boundary vegetation;

q) protect, or provide suitable diversion for, public footpath (3135) which should be enhanced to include improvements to surface quality and widening to allow for cycling;

#### Parcel B

r) provide a buffer of open space and then low density housing along the northern edge of the site nearest the A27 / National Park;

s) maintain separation between the eastern edge of Worthing and the more rural in character settlement to the east by limiting development to the western half of the site.

---

### **Proposed Modification Reference: MM32**

### **Para / Policy: A15 Upper Brighton Road Map Extracts Page 100**

#### **Description of modification:**

- In line with MM31 above, the red line boundary for the site (map and aerial photograph) have been amended to exclude the playing field. The legend has been amended accordingly.

#### **Reason for Modification:**

- For consistency and to ensure that the Plan is effective.





## A15 (now A14) Site Map and Aerial Photograph as Proposed by MM32

