

Appendix A – Consultation Response Schedule

Adur Green Infrastructure and Biodiversity Supplementary Planning Document

Worthing Green Infrastructure and Biodiversity Supplementary Planning Document

Biodiversity Net Gain Technical Advice Note

Urban Greening Technical Advice Note

Entry A1
Respondent:
ECE Planning on behalf of Croudace Homes
Issue Raised:
The respondent raised concern that elements of the draft Worthing Green Infrastructure and Biodiversity SPD could be interpreted as introducing new policy requirements rather than providing guidance to support adopted development plan policy.
Officer Response:
The councils acknowledge the importance of ensuring that the SPD remains clearly within the lawful role of supplementary planning guidance. The SPD is intended to support the interpretation and implementation of adopted development plan policy and does not form part of the statutory development plan. It does not introduce new policy, allocate land, create new designations or establish additional development management tests. The representation is accepted insofar as additional wording would improve legal clarity and reduce the risk of misinterpretation.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD, Introduction / status of the SPD section, and the Worthing Green Infrastructure and Biodiversity SPD, Introduction, Paragraph 1.3, to insert the following wording: "This SPD provides guidance to support the implementation of adopted development plan policy. It does not form part of the statutory development plan, does not allocate land, does not introduce new policy requirements and does not create additional development management tests beyond adopted policy and relevant legislation."

Entry A2
Respondent:
ECE Planning on behalf of Croudace Homes
Issue Raised:
The respondent raised concern that the SPD could be read as applying green infrastructure expectations mechanistically, without sufficient regard to the scale, nature and context of individual development proposals.
Officer Response:
The councils agree that the SPD should be applied proportionately and with regard to site-specific circumstances. The SPD is intended to guide the integration of multifunctional green infrastructure where relevant and proportionate, rather than impose a uniform requirement on all sites. Additional wording is appropriate to reinforce that proposals should be considered in the context of adopted policy, site circumstances and the wider planning balance.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD, Introduction / purpose of the SPD section, and the Worthing Green Infrastructure and Biodiversity SPD, Introduction, Paragraph 1.5, to replace existing wording, where equivalent wording appears, with: "This SPD provides guidance on how development proposals can incorporate multifunctional green infrastructure in a manner proportionate to the scale, nature and context of the proposal and consistent with adopted development plan policy."

Entry A3
Respondent:
ECE Planning on behalf of Croudace Homes
Issue Raised:
The respondent requested clearer explanation of the relationship between the Green Infrastructure and Biodiversity SPD and the Biodiversity Net Gain and Urban Greening Technical Advice Notes.
Officer Response:
The councils agree that clearer cross-referencing would improve usability and assist applicants in understanding the distinct role of each document. The SPD provides strategic and place-based green infrastructure guidance, while the Technical Advice Notes provide more detailed operational and technical guidance. Additional wording is therefore appropriate.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD and the Worthing Green Infrastructure and Biodiversity SPD, Section 1 Introduction, purpose and status, after Table 1: Relationship between legislation, policy and guidance, to insert a consolidated box titled "Related Guidance Documents". The box should list: Adur Green Infrastructure and Biodiversity SPD Worthing Green Infrastructure and Biodiversity SPD Adur & Worthing Biodiversity Net Gain TAN Adur & Worthing Urban Greening TAN The box should explain that the SPDs provide strategic and place-based green infrastructure and biodiversity guidance, while the Technical Advice Notes provide more detailed operational and technical guidance relating to biodiversity net gain implementation and urban greening measures. Applicants should consider the relevance of each document having regard to the nature, scale and location of the proposal.

Entry A4
Respondent:
ECE Planning on behalf of Croudace Homes
Issue Raised:
The respondent raised concern that environmental guidance could be interpreted in isolation from wider development plan objectives, including housing delivery and infrastructure provision.
Officer Response:
The councils agree that the SPD should not be read in isolation from the wider development plan. Green infrastructure guidance should support integrated planning outcomes and must be balanced with other adopted policy objectives, including sustainable growth, infrastructure delivery and housing provision. Additional wording is appropriate to reinforce this point.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD, development plan objectives / implementation section, and the Worthing Green Infrastructure and Biodiversity SPD, Paragraph 1.8, to insert the following wording: "This SPD should be applied in a manner which supports the integrated delivery of adopted development plan objectives including environmental enhancement, climate resilience, sustainable growth, infrastructure provision and housing delivery. The guidance should not be interpreted in isolation from the wider development plan strategy."

Entry A5
Respondent:
ECE Planning on behalf of Croudace Homes
Issue Raised:
The respondent raised concern that the Strategic Green Infrastructure Network mapping could be interpreted as creating a new planning designation or policy constraint.
Officer Response:
The councils do not agree that the Strategic Green Infrastructure Network creates a new designation. However, the councils recognise that additional explanation is appropriate to avoid any misinterpretation. The mapping brings together evidence layers, environmental information and adopted policy considerations to assist understanding of wider green infrastructure context. It does not create a presumption for or against development and does not predetermine planning outcomes.
Action:
Amendment proposed.
Amendment:

Amend the Adur Green Infrastructure and Biodiversity SPD and the Worthing Green Infrastructure and Biodiversity SPD to consolidate the Strategic Green Infrastructure Network clarification through amendments to the relevant mapping introduction, Map 1 key / legend and Box 2: How the Strategic Green Infrastructure Network should be used. The amendments should clarify that the Strategic Green Infrastructure Network is evidence-led and non-determinative; does not allocate land; does not create a new policy designation; does not operate as a constraint map; does not create a presumption for or against development; does not predetermine planning outcomes; and should be interpreted alongside site-specific technical evidence, ecological assessment, adopted policy and other material planning considerations.

Entry A6
Respondent:
ECE Planning on behalf of Croudace Homes
Issue Raised:
The respondent raised concern that the Strategic Green Infrastructure Network mapping could be applied without sufficient site-specific assessment or professional judgement.
Officer Response:
The councils agree that strategic mapping should not replace detailed site assessment. The purpose of the mapping is to support early site appraisal and design evolution. It should be interpreted alongside site-specific technical evidence, ecological assessment, adopted policy and other material planning considerations.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD and the Worthing Green Infrastructure and Biodiversity SPD to consolidate the Strategic Green Infrastructure Network clarification through amendments to the relevant mapping introduction, Map 1 key / legend and Box 2: How the Strategic Green Infrastructure Network should be used. The amendments should clarify that the Strategic Green Infrastructure Network is evidence-led and non-determinative; does not allocate land; does not create a new policy designation; does not operate as a constraint map; does not create a presumption for or against development; does not predetermine planning outcomes; and should be interpreted alongside site-specific technical evidence, ecological assessment, adopted policy and other material planning considerations. The Map 1 key / legend should include a note explaining that the mapping layers combine environmental evidence, strategic opportunities and adopted policy considerations and should not be interpreted as a single cumulative constraint map or as creating automatic restrictions on development.

Entry A7
Respondent:
ECE Planning on behalf of Croudace Homes
Issue Raised:
The respondent raised concern that wording in the SPD could be interpreted as requiring development proposals to deliver all identified green infrastructure functions irrespective of relevance, proportionality or site constraints.
Officer Response:
The councils agree that wording should be clear that development proposals should consider relevant and proportionate opportunities rather than be subject to automatic or cumulative requirements. The SPD should support design-led consideration of multifunctional green infrastructure, not impose inflexible requirements beyond adopted policy.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD and the Worthing Green Infrastructure and Biodiversity SPD to consolidate the Strategic Green Infrastructure Network clarification through amendments to the relevant mapping introduction, Map 1 key / legend and Box 2: How the Strategic Green Infrastructure Network should be used. The amendments should clarify that the Strategic Green Infrastructure Network is evidence-led and non-determinative; does not allocate land; does not create a new policy designation; does not operate as a constraint map; does not create a presumption for or against development; does not predetermine planning outcomes; and should be interpreted alongside site-specific technical evidence, ecological assessment, adopted policy and other material planning considerations.

Entry A8
Respondent:
ECE Planning on behalf of Croudace Homes
Issue Raised:
The respondent raised concern that the Strategic Green Infrastructure Network could prescribe fixed site layouts or internal boundaries for comprehensive redevelopment proposals, particularly in relation to allocated sites.
Officer Response:

The councils agree that strategic mapping should not be interpreted as prescribing detailed site layouts. The Strategic Green Infrastructure Network should inform masterplanning and design development, but it does not override adopted allocation policies or replace comprehensive site-specific assessment.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD and the Worthing Green Infrastructure and Biodiversity SPD to consolidate the Strategic Green Infrastructure Network clarification through amendments to the relevant mapping introduction, Map 1 key / legend and Box 2: How the Strategic Green Infrastructure Network should be used. The amendments should clarify that the Strategic Green Infrastructure Network is evidence-led and non-determinative; does not allocate land; does not create a new policy designation; does not operate as a constraint map; does not create a presumption for or against development; does not predetermine planning outcomes; and should be interpreted alongside site-specific technical evidence, ecological assessment, adopted policy and other material planning considerations.

Entry A9
Respondent:
ECE Planning on behalf of Croudace Homes
Issue Raised:
The respondent raised concern regarding the relationship between the Strategic Green Infrastructure Network and adopted site allocations, including whether mapped green infrastructure opportunities could alter the principle of development.
Officer Response:
The councils agree that the relationship between strategic mapping and adopted site allocations should be clearly explained. The Strategic Green Infrastructure Network provides evidence and opportunity context. It does not alter the principle of development established through adopted allocation policies.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD and the Worthing Green Infrastructure and Biodiversity SPD to consolidate the Strategic Green Infrastructure Network clarification through amendments to the relevant mapping introduction, Map 1 key / legend and Box 2: How the Strategic Green Infrastructure Network should be used. The amendments should clarify that the Strategic Green Infrastructure Network is evidence-led and non-determinative; does not allocate land; does not create a new policy designation; does not operate as a constraint map; does not create a presumption for or against development; does not predetermine planning outcomes; and should be interpreted alongside site-specific technical evidence, ecological assessment, adopted policy and other material planning considerations.

Entry A10
Respondent:
ECE Planning on behalf of Croudace Homes
Issue Raised:
The respondent raised concern regarding references to the Local Nature Recovery Strategy and the weight that should be attached to it in decision-making.
Officer Response:
The councils agree that the status of the Local Nature Recovery Strategy should be clearly expressed. The LNRS forms part of the wider environmental evidence base and is relevant to biodiversity and ecological network planning. It does not form part of the statutory development plan and should be considered proportionately alongside adopted policy, site-specific evidence and other material considerations.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD and Worthing Green Infrastructure and Biodiversity SPD, Paragraph 3.18, to insert the following wording: "The West Sussex Local Nature Recovery Strategy forms part of the wider environmental evidence base relevant to biodiversity and ecological network planning. The LNRS does not form part of the statutory development plan and should be considered proportionately alongside adopted policy, site-specific evidence and other material considerations."

Entry A11
Respondent:
ECE Planning on behalf of Croudace Homes
Issue Raised:
The respondent raised concern that environmental opportunity mapping, including ACIB mapping, could be interpreted as identifying mandatory interventions or development constraints.

Officer Response:
The councils agree that strategic mapping should be clearly distinguished from policy designations. Areas that Could become of particular Importance for Biodiversity (ACIB) mapping and other opportunity layers identify potential environmental opportunities and evidence-led context. They do not automatically require a particular intervention or outcome and should be interpreted proportionately.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD, ACIB / environmental opportunity mapping sections, and the Worthing Green Infrastructure and Biodiversity SPD, Paragraph 3.22 / ACIB / environmental opportunity mapping sections, to insert the following wording:
“Environmental opportunity mapping layers, including Areas that Could become of particular Importance for Biodiversity (ACIB) mapping where relevant, identify strategic opportunities which may be relevant to site planning and environmental assessment. Mapping layers should be interpreted proportionately alongside detailed site evidence, adopted policy and other material planning considerations. Inclusion within a mapped layer does not automatically indicate that a particular intervention or outcome is required.”

Entry A12
Respondent:
ECE Planning on behalf of Croudace Homes
Issue Raised:
The respondent raised concern that the Countryside and Coast layer could be interpreted as affecting the development potential of allocated land.
Officer Response:
The councils agree that the function of the Countryside and Coast layer should be clarified. This is taken from the adopted Worthing Policies Map. It is beyond the legal capacity of an SPD to modify an adopted policies map. The Green Infrastructure Network Map will be amended to reflect the built up area boundary
Action:
Amendment proposed.
Amendment:
Amend Map 1: Worthing Strategic Green Infrastructure Network in the Worthing Green Infrastructure and Biodiversity SPD to delete the Countryside and Coast layer from the map and associated key / legend.

Entry A13
Respondent:
ECE Planning on behalf of Croudace Homes
Issue Raised:
The respondent raised concern that overlapping mapping layers could be interpreted as creating cumulative mandatory requirements.
Officer Response:
The councils agree that overlapping mapping layers should not be interpreted mechanistically. Relevant considerations should be assessed proportionately having regard to the scale, nature and context of the proposal, alongside adopted policy and site-specific evidence.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD and the Worthing Green Infrastructure and Biodiversity SPD to consolidate the Strategic Green Infrastructure Network clarification through amendments to the relevant mapping introduction, Map 1 key / legend and Box 2: How the Strategic Green Infrastructure Network should be used. The amendments should clarify that the Strategic Green Infrastructure Network is evidence-led and non-determinative; does not allocate land; does not create a new policy designation; does not operate as a constraint map; does not create a presumption for or against development; does not predetermine planning outcomes; and should be interpreted alongside site-specific technical evidence, ecological assessment, adopted policy and other material planning considerations. The Map 1 key / legend should include a note explaining that the mapping layers combine environmental evidence, strategic opportunities and adopted policy considerations and should not be interpreted as a single cumulative constraint map or as creating automatic restrictions on development.

Entry A14
Respondent:
ECE Planning on behalf of Croudace Homes
Issue Raised:

The respondent raised concern that strategic woodland opportunity mapping could be interpreted as requiring woodland creation or retention irrespective of site-specific circumstances.
Officer Response:
The councils agree that woodland opportunity mapping should be presented as indicative opportunity mapping rather than a mandatory requirement. Site-specific ecological evidence and planning judgement remain essential.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD and the Worthing Green Infrastructure and Biodiversity SPD to include consolidated environmental opportunity mapping wording explaining that environmental opportunity mapping layers, including Areas that Could become of particular Importance for Biodiversity (ACIB) mapping and strategic woodland, hedgerow and scrub habitat opportunity mapping where relevant, identify strategic opportunities which may be relevant to site planning and environmental assessment. The wording should state that mapping layers should be interpreted proportionately alongside detailed site evidence, adopted policy and other material planning considerations, and that inclusion within a mapped layer does not automatically indicate that a particular intervention or outcome is required.

Entry A15
Respondent:
ECE Planning on behalf of Croudace Homes
Issue Raised:
The respondent raised concern that hedgerow opportunity mapping could be interpreted as requiring hedgerow creation or enhancement without regard to existing site conditions, viability or the wider planning balance.
Officer Response:
The councils agree that hedgerow opportunity mapping should inform consideration of potential ecological connectivity and habitat enhancement opportunities rather than determine outcomes. Site-specific evidence and planning judgement remain essential.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD and the Worthing Green Infrastructure and Biodiversity SPD to include consolidated environmental opportunity mapping wording explaining that environmental opportunity mapping layers, including Areas that Could become of particular Importance for Biodiversity (ACIB) mapping and strategic woodland, hedgerow and scrub habitat opportunity mapping where relevant, identify strategic opportunities which may be relevant to site planning and environmental assessment. The wording should state that mapping layers should be interpreted proportionately alongside detailed site evidence, adopted policy and other material planning considerations, and that inclusion within a mapped layer does not automatically indicate that a particular intervention or outcome is required.

Entry A16
Respondent:
ECE Planning on behalf of Croudace Homes
Issue Raised:
The respondent raised concern that scrub habitat opportunity mapping could be interpreted as requiring scrub creation or retention in all circumstances.
Officer Response:
The councils agree that scrub habitat opportunity mapping should be clearly framed as opportunity mapping and not as a determinative requirement. The SPD should support consideration of potential ecological enhancement opportunities while preserving planning judgement.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD and the Worthing Green Infrastructure and Biodiversity SPD to include consolidated environmental opportunity mapping wording explaining that environmental opportunity mapping layers, including Areas that Could become of particular Importance for Biodiversity (ACIB) mapping and strategic woodland, hedgerow and scrub habitat opportunity mapping where relevant, identify strategic opportunities which may be relevant to site planning and environmental assessment. The wording should state that mapping layers should be interpreted proportionately alongside detailed site evidence, adopted policy and other material planning considerations, and that inclusion within a mapped layer does not automatically indicate that a particular intervention or outcome is required.

Entry A17
Respondent:
ECE Planning on behalf of Croudace Homes
Issue Raised:
The respondent raised concern that the Strategic Green Infrastructure Network mapping legend could be interpreted as a single cumulative constraint map.
Officer Response:
The councils agree that the mapping legend should clearly explain the combined and evidential nature of the mapping. The Strategic Green Infrastructure Network brings together evidence, strategic opportunities and adopted policy considerations, but should not be interpreted as creating automatic restrictions on development.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD and Worthing Green Infrastructure and Biodiversity SPD, Strategic Green Infrastructure Network Mapping Legend, to insert the following wording:
“The mapping layers shown within the Strategic Green Infrastructure Network combine environmental evidence, strategic opportunities and adopted policy considerations. The combined mapping should not be interpreted as a single cumulative constraint map or as creating automatic restrictions on development.”

Entry A18
Respondent:
ECE Planning on behalf of Croudace Homes
Issue Raised:
The respondent raised concern that the application of the Strategic Green Infrastructure Network could predetermine outcomes rather than inform planning judgement.
Officer Response:
The councils agree that the role of planning judgement should be explicit. Strategic mapping is intended to inform decision-making and support early assessment, not determine the outcome of planning applications.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD and the Worthing Green Infrastructure and Biodiversity SPD to consolidate the Strategic Green Infrastructure Network clarification through amendments to the relevant mapping introduction, Map 1 key / legend and Box 2: How the Strategic Green Infrastructure Network should be used.
The amendments should clarify that the Strategic Green Infrastructure Network is evidence-led and non-determinative; does not allocate land; does not create a new policy designation; does not operate as a constraint map; does not create a presumption for or against development; does not predetermine planning outcomes; and should be interpreted alongside site-specific technical evidence, ecological assessment, adopted policy and other material planning considerations.

Entry A19
Respondent:
ECE Planning on behalf of Croudace Homes
Issue Raised:
The respondent raised concern that biodiversity net gain wording within the guidance could be interpreted as extending statutory requirements or prioritising on-site delivery irrespective of site circumstances.
Officer Response:
The councils agree that biodiversity net gain wording should remain consistent with statutory requirements, adopted policy and national guidance applicable to the proposal at the relevant time. The TAN does not increase statutory biodiversity net gain requirements and does not require on-site delivery in all circumstances. Off-site delivery may be appropriate where permitted by the statutory framework and justified by site-specific circumstances.
Action:
Amendment proposed.
Amendment:
Amend the Adur & Worthing Biodiversity Net Gain TAN to include the following wording in the section addressing delivery options:
“Opportunities for on-site biodiversity net gain delivery should be considered where appropriate having regard to site-specific circumstances, viability considerations, ecological effectiveness, brownfield constraints and the statutory framework applicable to the proposal at the relevant time. Off-site biodiversity net gain delivery mechanisms may also be appropriate where permitted through the statutory framework.”

Entry A20
Respondent:
ECE Planning on behalf of Croudace Homes
Issue Raised:
The respondent raised concern that references to strategic significance could be interpreted as imposing additional requirements on sites located within strategic opportunity areas.
Officer Response:
The councils agree that the role of strategic significance should be clarified. Strategic significance is relevant to biodiversity metric assessment and ecological context where applicable, but it should be applied in accordance with statutory metric guidance and the statutory framework applicable to the proposal at the relevant time. It should not be interpreted as creating additional local requirements beyond adopted policy or legislation.
Action:
Amendment proposed.
Amendment:
Amend the Adur & Worthing Biodiversity Net Gain TAN section addressing strategic significance to include the following wording:
“Strategic significance should be assessed in accordance with the relevant biodiversity metric guidance and statutory framework applicable to the proposal at the relevant time. Strategic opportunity mapping may provide relevant context, but it should not be interpreted as creating additional biodiversity net gain requirements beyond legislation, adopted policy or applicable metric guidance.”

Entry A21
Respondent:
ECE Planning on behalf of Croudace Homes
Issue Raised:
The respondent raised concern that the guidance should better acknowledge the need to balance environmental objectives with housing delivery, infrastructure, viability and site-specific constraints.
Officer Response:
The councils agree that proportionality and balanced planning judgement should be expressed clearly throughout the guidance. Green infrastructure and biodiversity objectives are important, but they must be considered alongside adopted policy, site-specific evidence and the wider planning balance.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD, implementation / planning judgement section, and the Worthing Green Infrastructure and Biodiversity SPD, Paragraph 2.7 or equivalent implementation / planning judgement section, to insert the following wording:
“The application of this SPD requires proportionate planning judgement having regard to site-specific circumstances, adopted policy, technical evidence, viability considerations where relevant and the wider planning balance. The guidance should not be interpreted mechanistically or in isolation from other material considerations.”

Entry A22
Respondent:
Arun District Council
Issue Raised:
The respondent considered that the documents were generally robust, thorough and well structured, but suggested that the relationship between the SPDs and TANs should be made clearer.
Officer Response:
The councils welcome the positive comments and agree that clearer signposting between the SPDs and TANs would improve usability. The SPDs provide strategic and place-based guidance, while the TANs provide more detailed operational and technical guidance. Additional wording is appropriate.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD and the Worthing Green Infrastructure and Biodiversity SPD, Section 1 Introduction, purpose and status, after Table 1: Relationship between legislation, policy and guidance, to insert a consolidated box titled “Related Guidance Documents”.
The box should list:

Adur Green Infrastructure and Biodiversity SPD
Worthing Green Infrastructure and Biodiversity SPD
Adur & Worthing Biodiversity Net Gain TAN
Adur & Worthing Urban Greening TAN

Entry A23
Respondent:
Arun District Council
Issue Raised:
The respondent suggested that the guidance documents would benefit from a standardised cross-reference section to improve navigation and assist applicants in understanding how the documents operate together.
Officer Response:
The councils agree that a consistent cross-reference section would improve usability. The documents form a complementary suite of guidance and should be read together where relevant to the proposal.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD and the Worthing Green Infrastructure and Biodiversity SPD, Section 1 Introduction, purpose and status, after Table 1: Relationship between legislation, policy and guidance, to insert a consolidated box titled "Related Guidance Documents". The box should list: Adur Green Infrastructure and Biodiversity SPD Worthing Green Infrastructure and Biodiversity SPD Adur & Worthing Biodiversity Net Gain TAN Adur & Worthing Urban Greening TAN

Entry A24
Respondent:
Arun District Council
Issue Raised:
The respondent suggested that the SPDs should include stronger links to national green infrastructure best practice, including the UK Green Infrastructure Framework.
Officer Response:
The councils agree that additional signposting to the UK Green Infrastructure Framework would assist applicants and decision-makers. The amendment would support usability and alignment with current best practice without duplicating national guidance.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD, Paragraph 1.9, and the Worthing Green Infrastructure and Biodiversity SPD, Paragraph 1.10, to insert: "Applicants and decision-makers may also find it helpful to refer to the UK Green Infrastructure Framework and associated best practice guidance relevant to multifunctional green infrastructure planning and delivery."

Entry A25
Respondent:
Arun District Council
Issue Raised:
The respondent suggested that the Adur Green Infrastructure and Biodiversity SPD should provide stronger local context and refer more clearly to the borough's coastal, estuarine, river corridor and floodplain characteristics.
Officer Response:
The councils agree that additional borough-specific context would improve the SPD and reduce unnecessary reliance on generic national guidance. The Adur SPD should better reflect the distinctive coastal, estuarine and river corridor environment of the district.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD, Local Context section, Paragraph 2.2, to insert: "Adur contains distinctive environmental and landscape characteristics including coastal and estuarine environments, river corridors, floodplain landscapes, urban waterfront areas and strategic green infrastructure connections extending between

the coast and the South Downs National Park. Green infrastructure planning should respond positively to these locally distinctive characteristics.”

Entry A26

Respondent:

Arun District Council

Issue Raised:

The respondent suggested that the Adur SPD should provide additional contextual guidance relating to Shoreham Harbour, the River Adur and coastal plain relationships.

Officer Response:

The councils agree that this local context is relevant to green infrastructure planning in Adur. Additional wording would assist applicants in understanding the strategic green infrastructure relationships within the borough.

Action:

Amendment proposed.

Amendment:

Amend the Adur Green Infrastructure and Biodiversity SPD, Context section, Paragraph 2.05, to insert:

“The district includes important coastal and estuarine environments, river corridor landscapes, floodplain relationships and strategic green infrastructure connections associated with Shoreham Harbour, the River Adur and the wider coastal plain. Green infrastructure proposals should respond appropriately to these locally distinctive characteristics.”

Entry A27

Respondent:

Arun District Council

Issue Raised:

The respondent suggested that the Adur & Worthing Urban Greening TAN should refer to wider best practice guidance, including the UK Green Infrastructure Framework, Building with Nature, Urban Greening Factor approaches and illustrative examples.

Officer Response:

The councils agree that improved signposting and examples would assist usability. The TAN should remain guidance rather than policy and should not prescribe a single methodology. However, references to relevant good practice and illustrative examples would help applicants understand how urban greening can be integrated into development.

Action:

Amendment proposed.

Amendment:

Amend the Adur & Worthing Urban Greening TAN, Paragraph 1.7, to insert:

“Applicants and decision-makers may also find it helpful to refer to relevant best practice guidance including the UK Green Infrastructure Framework, Building with Nature, Urban Greening Factor approaches and other relevant urban greening guidance. Illustrative diagrams, photographs and worked examples may be used within the TAN to support understanding of how urban greening measures can be integrated into development proposals.”

Entry A28

Respondent:

Arun District Council

Issue Raised:

The respondent identified duplication between introductory sections of the Adur & Worthing Urban Greening TAN and suggested that wording should be consolidated.

Officer Response:

The councils agree that unnecessary duplication should be reduced where this improves usability without removing necessary context. Consolidated wording would help clarify the relationship between the TAN and the Green Infrastructure and Biodiversity SPDs.

Action:

Amendment proposed.

Amendment:

Amend the Adur & Worthing Urban Greening TAN, Paragraphs 1.01 and 1.09, to consolidate overlapping wording and include:

“This TAN provides technical guidance relating to urban greening measures and should be read alongside the relevant Green Infrastructure and Biodiversity SPD and other applicable planning guidance.”

Entry A29

Respondent:

Arun District Council
Issue Raised:
The respondent suggested that green roofs and green walls guidance should be clearer regarding feasibility, maintenance, safety and site-specific constraints.
Officer Response:
The councils agree that urban greening measures should be considered proportionately and with regard to technical feasibility. Green walls and green roofs can provide important benefits, but not all systems are appropriate for all buildings or contexts.
Action:
Amendment proposed.
Amendment:
Amend the Adur & Worthing Urban Greening TAN section addressing green walls and green roofs to include: "The suitability of green wall systems should be considered having regard to site-specific factors including structural feasibility, building safety requirements, maintenance requirements, irrigation needs, long-term management arrangements, visual impact and operational practicality. Certain systems may not be appropriate for all building types or heights, including some residential buildings above 11 metres."

Entry A30
Respondent:
Arun District Council
Issue Raised:
The respondent suggested that guidance on trees should reference relevant arboricultural standards and urban tree guidance.
Officer Response:
The councils agree that signposting to relevant arboricultural standards and guidance would assist applicants. The guidance should remain flexible to allow for future updates to standards and best practice.
Action:
Amendment proposed.
Amendment:
Amend the Adur & Worthing Urban Greening TAN tree guidance sections to include: "Applicants should have regard to relevant arboricultural standards and guidance applicable to the proposal at the relevant time, including BS 5837 and relevant urban tree guidance."

Entry A31
Respondent:
Arun District Council
Issue Raised:
The respondent identified duplication between Sections 3 and 4 of the Adur & Worthing Urban Greening TAN.
Officer Response:
The councils agree that overlapping wording should be reduced where this improves readability. The TAN should remain sufficiently detailed to be usable, but unnecessary repetition can be removed.
Action:
Amendment proposed.
Amendment:
Amend the Adur & Worthing Urban Greening TAN, Sections 3 and 4, to consolidate overlapping wording relating to urban greening design principles and implementation measures while retaining the substantive guidance on trees, planting, green roofs, green walls, sustainable drainage and ecological enhancement.

Entry A32
Respondent:
Arun District Council
Issue Raised:
The respondent identified repeated wording in Paragraph 6.18 of the Adur & Worthing Urban Greening TAN.
Officer Response:
The councils agree that repeated wording should be removed to improve readability.
Action:
Amendment proposed.
Amendment:
Replace and consolidate the relevant introductory, local policy and statutory framework sections of the Adur & Worthing Biodiversity Net Gain TAN to clarify that statutory biodiversity net gain requirements apply only where required by legislation

and regulations applicable to the proposal at the relevant time and remain subject to exemptions, thresholds and transitional arrangements.

The amended wording should also clarify the relationship between statutory biodiversity net gain and Worthing Local Plan Policy DM18, confirm that the TAN does not introduce any additional biodiversity net gain requirement beyond legislation or adopted development plan policy, and state that detailed technical requirements should be interpreted in accordance with the statutory framework and national guidance applicable to the proposal at the relevant time.

Entry A33

Respondent:

Arun District Council

Issue Raised:

The respondent raised concern that the Adur & Worthing Biodiversity Net Gain TAN should not imply that all development is automatically subject to biodiversity net gain requirements.

Officer Response:

The councils agree. Biodiversity net gain requirements apply only where required by legislation, regulations or adopted policy applicable to the proposal at the relevant time. The TAN should consistently acknowledge exemptions, thresholds and transitional arrangements.

Action:

Amendment proposed.

Amendment:

Amend the Adur & Worthing Biodiversity Net Gain TAN, Introduction / Statutory Framework section, to include:

“Statutory biodiversity net gain requirements apply only where required by legislation and regulations applicable to the proposal at the relevant time and remain subject to exemptions, thresholds and transitional arrangements established through legislation and national guidance. Applicants should also have regard to statutory requirements and policy protections relating to priority habitats and protected sites where applicable.”

Entry A34

Respondent:

Arun District Council

Issue Raised:

The respondent requested clarification regarding the relationship between the statutory 10% biodiversity net gain requirement and the 20% requirement in Worthing Local Plan Policy DM18.

Officer Response:

The councils agree that the relationship between statutory and adopted local requirements should be clearly explained. The TAN cannot increase statutory biodiversity net gain requirements. Any local requirement above the statutory minimum must be grounded in adopted development plan policy.

Action:

Amendment proposed.

Amendment:

Replace and consolidate the relevant introductory, local policy and statutory framework sections of the Adur & Worthing Biodiversity Net Gain TAN to clarify that statutory biodiversity net gain requirements apply only where required by legislation and regulations applicable to the proposal at the relevant time and remain subject to exemptions, thresholds and transitional arrangements.

The amended wording should also clarify the relationship between statutory biodiversity net gain and Worthing Local Plan Policy DM18, confirm that the TAN does not introduce any additional biodiversity net gain requirement beyond legislation or adopted development plan policy, and state that detailed technical requirements should be interpreted in accordance with the statutory framework and national guidance applicable to the proposal at the relevant time.

Entry A35

Respondent:

Arun District Council

Issue Raised:

The respondent raised concern that the TAN should not imply that a 20% biodiversity net gain requirement can be applied universally through guidance.

Officer Response:

The councils agree. Any higher biodiversity net gain requirement beyond the statutory minimum must be established through adopted policy and supported by appropriate evidence. The TAN provides guidance only and cannot introduce a new percentage requirement.

Action:

Amendment proposed.

Amendment:

Replace and consolidate the relevant introductory, local policy and statutory framework sections of the Adur & Worthing Biodiversity Net Gain TAN to clarify that statutory biodiversity net gain requirements apply only where required by legislation and regulations applicable to the proposal at the relevant time and remain subject to exemptions, thresholds and transitional arrangements.

The amended wording should also clarify the relationship between statutory biodiversity net gain and Worthing Local Plan Policy DM18, confirm that the TAN does not introduce any additional biodiversity net gain requirement beyond legislation or adopted development plan policy, and state that detailed technical requirements should be interpreted in accordance with the statutory framework and national guidance applicable to the proposal at the relevant time.

Entry A36

Respondent:

Arun District Council

Issue Raised:

The respondent requested clearer wording regarding exemptions, thresholds and transitional arrangements within the statutory biodiversity net gain framework.

Officer Response:

The councils agree that clearer wording is required. The statutory framework includes exemptions, thresholds and transitional arrangements, and the TAN should avoid implying that all development is subject to biodiversity net gain.

Action:

Amendment proposed.

Amendment:

Replace and consolidate the relevant introductory, local policy and statutory framework sections of the Adur & Worthing Biodiversity Net Gain TAN to clarify that statutory biodiversity net gain requirements apply only where required by legislation and regulations applicable to the proposal at the relevant time and remain subject to exemptions, thresholds and transitional arrangements.

The amended wording should also clarify the relationship between statutory biodiversity net gain and Worthing Local Plan Policy DM18, confirm that the TAN does not introduce any additional biodiversity net gain requirement beyond legislation or adopted development plan policy, and state that detailed technical requirements should be interpreted in accordance with the statutory framework and national guidance applicable to the proposal at the relevant time.

Entry A37

Respondent:

Arun District Council

Issue Raised:

The respondent requested clarification regarding the competence of persons preparing biodiversity information and Small Sites Metric submissions.

Officer Response:

The councils agree that biodiversity information should be prepared by appropriately competent persons. However, the wording should remain proportionate and should not create requirements beyond applicable legislation, metric guidance or validation requirements.

Action:

Amendment proposed.

Amendment:

Amend the Adur & Worthing Biodiversity Net Gain TAN to include:

“Biodiversity information and metric assessments, including Small Sites Metric submissions where applicable, should be prepared by persons with appropriate ecological expertise and experience relevant to the proposal.”

Entry A38

Respondent:

Arun District Council

Issue Raised:

The respondent requested clarification regarding validation requirements and supporting biodiversity information.

Officer Response:

The councils agree that validation and supporting information requirements should be expressed proportionately. The TAN may guide applicants on likely information requirements but should remain consistent with adopted local validation requirements, statutory requirements and national guidance applicable at the relevant time.

Action:

Amendment proposed.

Amendment:

Amend the Adur & Worthing Biodiversity Net Gain TAN validation section to include:

“Supporting information requirements should remain proportionate to the nature, scale and characteristics of the proposal and consistent with adopted local validation requirements, statutory requirements and national guidance applicable at the relevant time.”

Entry A39

Respondent:

Arun District Council

Issue Raised:

The respondent requested clarification regarding mechanisms for securing biodiversity net gain, including planning conditions, legal agreements and off-site delivery arrangements.

Officer Response:

The councils agree that the TAN should acknowledge that the appropriate securing mechanism will depend on the circumstances of the proposal. Securing arrangements may include conditions, legal agreements or other mechanisms as appropriate, having regard to the statutory framework applicable at the relevant time.

Action:

Amendment proposed.

Amendment:

Amend the Adur & Worthing Biodiversity Net Gain TAN to include:

“Biodiversity net gain delivery, management and monitoring arrangements may be secured through planning conditions, legal agreements or other mechanisms as appropriate having regard to the proposal and statutory framework applicable at the relevant time. The appropriate securing mechanism, parties to any agreement and management arrangements will depend on the characteristics of the proposal, land ownership arrangements and the biodiversity net gain delivery approach proposed.”

Entry A40

Respondent:

Arun District Council

Issue Raised:

The respondent requested clarification regarding Habitat Management and Monitoring Plans and the circumstances in which they may be required.

Officer Response:

The councils agree that the TAN should not imply that Habitat Management and Monitoring Plans are universally required. Such plans may be required where necessary and proportionate, having regard to the proposal, habitat provision and statutory framework applicable to the proposal at the relevant time.

Action:

Amendment proposed.

Amendment:

Amend the Adur & Worthing Biodiversity Net Gain TAN, Habitat Management and Monitoring Plans section, to include:

“Habitat Management and Monitoring Plans may be required where necessary and proportionate having regard to the nature of the proposal, the scale and significance of habitat enhancement proposed, the presence of significant on-site habitat provision, the biodiversity measures proposed and the statutory framework applicable to the proposal at the relevant time.”

Entry A41

Respondent:

Arun District Council

Issue Raised:

The respondent requested that the TAN explain where river or watercourse metrics may be required.

Officer Response:

The councils agree that additional clarification would assist applicants. The need for any additional habitat-specific metric tool should depend on the habitats affected and the statutory biodiversity net gain framework applicable to the proposal at the relevant time.

Action:

Amendment proposed.

Amendment:

Amend the Adur & Worthing Biodiversity Net Gain TAN to include:

“Where relevant to the habitats affected and the statutory biodiversity net gain framework applicable to the proposal at the relevant time, additional habitat-specific metric tools, including river or watercourse metrics where applicable to sites containing or affecting watercourses, may also be required.”

Entry A42
Respondent:
Arun District Council
Issue Raised:
The respondent suggested that the TAN should give greater prominence to the mitigation hierarchy.
Officer Response:
The councils agree that the mitigation hierarchy is a key principle and should be clearly explained. Biodiversity net gain does not replace the need to avoid, minimise, mitigate and, where necessary, compensate for ecological harm where applicable.
Action:
Amendment proposed.
Amendment:
Amend the Adur & Worthing Biodiversity Net Gain TAN, including Figures 1 and 2 or the accompanying text, to include: "Development proposals should have regard to the mitigation hierarchy and seek to avoid, minimise, mitigate and compensate for adverse ecological impacts where applicable having regard to the characteristics of the proposal, site-specific circumstances and statutory requirements applicable at the relevant time."

Entry A43
Respondent:
Arun District Council
Issue Raised:
The respondent requested clarification regarding constrained and previously developed sites.
Officer Response:
The councils agree that the TAN should acknowledge that constrained and previously developed sites require proportionate, site-specific assessment. Previously developed land may contain ecological value and should not be assumed to have low biodiversity value.
Action:
Amendment proposed.
Amendment:
Amend the Adur & Worthing Biodiversity Net Gain TAN to include: "Previously developed land may contain ecological value including Open Mosaic Habitat and should be assessed through proportionate site-specific ecological assessment and planning judgement having regard to the characteristics of the proposal and relevant statutory requirements applicable at the relevant time."

Entry A44
Respondent:
Arun District Council
Issue Raised:
The respondent suggested that references to national biodiversity net gain guidance and metric tools should be future-proofed.
Officer Response:
The councils agree. The national biodiversity net gain framework continues to evolve, and the TAN should direct applicants to the most up-to-date statutory guidance, regulations and metric tools applicable to the proposal at the relevant time.
Action:
Amendment proposed.
Amendment:
Amend the Adur & Worthing Biodiversity Net Gain TAN introduction to include: "Applicants and decision-makers should have regard to the most up-to-date statutory biodiversity net gain guidance, regulations, biodiversity metric tools and implementation guidance applicable to the proposal at the relevant time."

Entry A45
Respondent:
Arun District Council
Issue Raised:
The respondent suggested that the TAN should address proportionality for small, medium-sized and previously developed sites.
Officer Response:
The councils agree. Biodiversity net gain implementation should be proportionate to the nature, scale, characteristics and constraints of the proposal.
Action:
Amendment proposed.

Amendment:
Amend the Adur & Worthing Biodiversity Net Gain TAN to include:
“The application of biodiversity net gain requirements and supporting information expectations should remain proportionate having regard to the nature, scale, characteristics and constraints of the proposal, including small, medium-sized and previously developed sites where relevant.”

Entry A46
Respondent:
Arun District Council
Issue Raised:
The respondent suggested that the Adur SPD should recognise coastal and estuarine green infrastructure relationships more fully.
Officer Response:
The councils agree that additional wording would strengthen local distinctiveness and assist applicants in considering coastal and estuarine green infrastructure opportunities.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD, Paragraph 5.28, to insert:
“Coastal and estuarine green infrastructure proposals should have regard to marine biodiversity, ecological connectivity, climate resilience and water quality considerations where relevant.”

Entry A47
Respondent:
Arun District Council
Issue Raised:
The respondent suggested that the SPDs should include stronger guidance on ecological connectivity and biodiversity corridors.
Officer Response:
The councils agree that additional wording would strengthen the relationship between development proposals, biodiversity corridors and locally appropriate habitat or species enhancement measures.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD and Worthing Green Infrastructure and Biodiversity SPD ecological connectivity sections to include:
“Development proposals should consider opportunities to support biodiversity corridors, ecological connectivity and locally appropriate species or habitat enhancement measures where relevant and proportionate to the proposal.”

Entry A48
Respondent:
Arun District Council
Issue Raised:
The respondent suggested that access and movement guidance should recognise a range of users, including equestrians where appropriate.
Officer Response:
The councils agree that inclusive access should be considered where relevant to site context, safety, design and management. The amendment should not imply that all green corridors are suitable for all users but should support proportionate consideration.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD and Worthing Green Infrastructure and Biodiversity SPD access, movement and green corridor sections to include:
“Where green corridors and open spaces are intended to provide recreational access, consideration should be given to the needs of a range of users, including walkers, cyclists and equestrians where appropriate having regard to site context, safety, design and management considerations.”

Entry A49
Respondent:

Arun District Council
Issue Raised:
The respondent suggested that the documents should improve usability through clearer diagrams, summary boxes and cross-references.
Officer Response:
The councils agree that usability improvements are appropriate. The documents address technical subject matter and should be accessible to applicants and decision-makers.
Action:
Amendment proposed.
Amendment:
Amend the Adur & Worthing Biodiversity Net Gain TAN to include:
“To improve usability and accessibility, summary boxes, diagrams and flow charts may be used throughout this TAN to assist applicants and decision-makers in understanding key procedural and assessment stages.”
Amend the Adur & Worthing Urban Greening TAN to include:
“To improve usability and accessibility, summary boxes, diagrams and concise key message sections may be used throughout this TAN to support applicants and decision-makers.”

Entry A50
Respondent:
Arun District Council
Issue Raised:
The respondent suggested that the Adur SPD should better reflect the distinctive coastal, estuarine and river corridor context of the district.
Officer Response:
The councils agree. Additional local context would improve the place-based nature of the SPD and assist applicants in understanding the borough’s environmental characteristics.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD, Local Context section, Paragraph 2.2, to insert:
“Adur contains distinctive environmental and landscape characteristics including coastal and estuarine environments, river corridors, floodplain landscapes, urban waterfront areas and strategic green infrastructure connections extending between the coast and the South Downs National Park. Green infrastructure planning should respond positively to these locally distinctive characteristics.”
Amend the Adur Green Infrastructure and Biodiversity SPD, Context section, Paragraph 2.05, to insert:
“The borough includes important coastal and estuarine environments, river corridor landscapes, floodplain relationships and strategic green infrastructure connections associated with Shoreham Harbour, the River Adur and the wider coastal plain. Green infrastructure proposals should respond appropriately to these locally distinctive characteristics.”

Entry A51
Respondent:
Arun District Council
Issue Raised:
The respondent suggested that the Worthing SPD should better reflect urban intensification pressures and opportunities for ecological connectivity, canopy cover and multifunctional green infrastructure.
Officer Response:
The councils agree. The Worthing SPD should include additional local context to distinguish Worthing’s urban and coastal characteristics and the importance of integrating green infrastructure within an intensified urban environment.
Action:
Amendment proposed.
Amendment:
Amend the Worthing Green Infrastructure and Biodiversity SPD, Paragraph 2.3, to insert:
“Worthing contains distinct environmental and urban characteristics including urban intensification pressures, strategic ecological connectivity corridors, coastal plain landscapes and opportunities for urban canopy enhancement and multifunctional green infrastructure integration.”
Amend the Worthing Green Infrastructure and Biodiversity SPD, Paragraph 2.6, to insert:
“Worthing experiences significant urban intensification pressures together with opportunities for urban greening, urban canopy enhancement, multifunctional public realm improvements and improved ecological connectivity across the borough.”

Entry A52
Respondent:
Environment Agency
Issue Raised:
The respondent requested clarification that river or watercourse metric requirements may apply to sites containing or affecting watercourses.
Officer Response:
The councils agree that this point should be clarified. The need for river or watercourse metric information will depend on the habitats affected and the statutory biodiversity net gain framework applicable to the proposal at the relevant time.
Action:
Amendment proposed.
Amendment:
Amend the Adur & Worthing Biodiversity Net Gain TAN to include:
“Where relevant to the habitats affected and the statutory biodiversity net gain framework applicable to the proposal at the relevant time, additional habitat-specific metric tools, including river or watercourse metrics where applicable to sites containing or affecting watercourses, may also be required.”

Entry A53
Respondent:
Environment Agency
Issue Raised:
The respondent identified a broken or unclear cross-reference within the Adur & Worthing Biodiversity Net Gain TAN relating to watercourse or metric requirements.
Officer Response:
The councils agree that cross-references should be correct and usable. Broken or unclear references should be corrected prior to publication.
Action:
Amendment proposed.
Amendment:
Amend the Adur & Worthing Biodiversity Net Gain TAN to review and correct cross-references in the sections addressing metric requirements, including Table 5 and Appendix 1, to ensure that references to watercourse or river metric information are accurate and internally consistent.

Entry A54
Respondent:
Environment Agency
Issue Raised:
The respondent referred to the relationship between the guidance and Shoreham Harbour planning context, including the Shoreham Harbour Joint Area Action Plan.
Officer Response:
The councils agree that future strategic planning and policy review relating to Shoreham Harbour should be addressed through the relevant Local Plan review process. The SPD can provide green infrastructure context but should not pre-empt future policy review.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD to include:
“Future strategic planning and policy review relating to Shoreham Harbour will be addressed through the relevant Local Plan review process.”

Entry A55
Respondent:
Southern Water
Issue Raised:
The respondent supported the inclusion of sustainable drainage and water infrastructure considerations within the guidance.
Officer Response:
The councils welcome the support. No amendment is required in response to the general support, although related technical comments are addressed in separate entries.
Action:

No amendment required.
Amendment:
No amendment proposed.

Entry A56
Respondent:
Southern Water
Issue Raised:
The respondent requested that sustainable drainage proposals should have regard to relevant national standards.
Officer Response:
The councils agree that sustainable drainage guidance should refer to relevant national standards and guidance applicable at the relevant time.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD, Paragraph 5.14, to insert:
“Sustainable drainage proposals should be designed having regard to relevant national standards and guidance applicable at the relevant time, including the Non-Statutory Technical Standards for Sustainable Drainage Systems where relevant.”

Entry A57
Respondent:
Southern Water
Issue Raised:
The respondent requested that the guidance should avoid encouraging unnecessary discharge of surface water to foul-only sewer systems.
Officer Response:
The councils agree. Sustainable drainage should seek to manage surface water appropriately and avoid unnecessary discharge to foul-only sewers where feasible and appropriate, having regard to site-specific circumstances and infrastructure constraints.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD, Paragraph 5.17, to insert:
“Development proposals should seek to manage surface water sustainably and avoid unnecessary discharge to foul-only sewer systems where feasible and appropriate having regard to site-specific circumstances and infrastructure constraints.”

Entry A58
Respondent:
Southern Water
Issue Raised:
The respondent requested that green infrastructure and drainage guidance recognise water quality and wastewater infrastructure considerations.
Officer Response:
The councils agree that water quality and wastewater infrastructure are relevant considerations where affected by development proposals.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD, Paragraph 5.21, to insert:
“Green infrastructure and drainage proposals should have regard to water quality considerations and the capacity and operation of wastewater infrastructure where relevant.”

Entry A59
Respondent:
Southern Water
Issue Raised:
The respondent requested that the guidance recognise long-term management and maintenance arrangements for green infrastructure and sustainable drainage features.
Officer Response:

The councils agree that long-term management and maintenance are important to the effectiveness of green infrastructure and sustainable drainage features.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD, Paragraph 5.23, to insert:
“Where relevant, proposals should demonstrate that appropriate arrangements are in place for the long-term management and maintenance of green infrastructure and sustainable drainage features.”

Entry A60
Respondent:
Marine Management Organisation
Issue Raised:
The respondent requested that relevant proposals should have regard to the South Marine Plan.
Officer Response:
The councils agree that coastal and estuarine development proposals may need to have regard to the South Marine Plan where relevant. The South Marine Plan provides relevant marine planning context, particularly for biodiversity, climate resilience, coastal change and water quality.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD, Coastal Context section, Paragraph 2.11, to insert:
“Relevant development proposals within coastal and estuarine areas should also have regard to the South Marine Plan and associated marine planning considerations where applicable, including policies relating to biodiversity, climate resilience, coastal change and water quality.”

Entry A61
Respondent:
Marine Management Organisation
Issue Raised:
The respondent requested reference to marine licensing and associated consenting processes.
Officer Response:
The councils agree that certain coastal, estuarine and waterfront development may require marine licences or other consents. Additional guidance would improve procedural clarity.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD, Paragraph 2.12, to insert:
“Certain forms of coastal, estuarine and waterfront development may also require marine licences or other consents. Applicants should have regard to relevant marine consenting processes and associated guidance, including the Coastal Concordat where applicable.”

Entry A62
Respondent:
Marine Management Organisation
Issue Raised:
The respondent requested that marine biodiversity, climate change adaptation, coastal change and water quality be more clearly referenced.
Officer Response:
The councils agree. The Adur SPD should better integrate terrestrial and marine environmental considerations in coastal and estuarine contexts.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD, Paragraph 5.28, to insert:
“Coastal and estuarine green infrastructure proposals should have regard to marine biodiversity, ecological connectivity, climate resilience and water quality considerations where relevant.”

Entry A63
Respondent:
National Highways
Issue Raised:
The respondent requested that the guidance recognise the Strategic Road Network and relevant National Highways guidance where proposals may affect it.
Officer Response:
The councils agree that relevant development proposals should have regard to potential impacts on the Strategic Road Network and engage with the appropriate highway authority where necessary. This should be framed proportionately and only where relevant to the proposal.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD and Worthing Green Infrastructure and Biodiversity SPD to include:
“Where relevant to the proposal, applicants should have regard to potential impacts on the Strategic Road Network and engage with the appropriate highway authority and associated guidance where necessary, including DfT Circular 01/2022, the Design Manual for Roads and Bridges and relevant National Highways environmental guidance applicable at the relevant time.”

Entry A64
Respondent:
National Highways
Issue Raised:
The respondent supported the overall objectives relating to biodiversity enhancement and green infrastructure, while noting that environmental enhancements should be considered alongside infrastructure, operational and safety considerations affecting the Strategic Road Network where relevant.
Officer Response:
The councils welcome the support and agree that environmental enhancement should be considered alongside wider infrastructure and safety considerations where relevant. Additional wording is appropriate to ensure balanced application of the guidance.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD and Worthing Green Infrastructure and Biodiversity SPD to include:
“The guidance within this SPD should be applied having regard to site-specific circumstances and the need to balance environmental, infrastructure, transport, design and safety considerations where relevant.”

Entry A65
Respondent:
Historic England
Issue Raised:
The respondent did not raise substantive comments requiring amendment to the documents.
Officer Response:
The councils note the response. No amendment is required.
Action:
No amendment required.
Amendment:
No amendment proposed.

Entry A66
Respondent:
Worthing Society
Issue Raised:
The respondent supported the general objective of improving green infrastructure and biodiversity in Worthing and highlighted the importance of tree planting, urban greening and public realm improvement.
Officer Response:

The councils welcome the support. The Worthing Green Infrastructure and Biodiversity SPD and Urban Greening TAN already provide guidance on urban greening, trees, planting and multifunctional public realm improvements. No substantive amendment is required beyond amendments already proposed to strengthen local context and urban greening guidance.
Action:
No further amendment required.
Amendment:
No further amendment proposed.

Entry A67
Respondent:
Worthing Society
Issue Raised:
The respondent sought stronger recognition of the importance of urban canopy cover and tree planting in Worthing.
Officer Response:
The councils agree that urban canopy cover and tree planting are important components of urban greening and climate resilience. The Worthing SPD will be amended to strengthen borough-specific urban greening context, and the Adur & Worthing Urban Greening TAN will include additional signposting to relevant arboricultural guidance.
Action:
Amendment proposed.
Amendment:
Amend the Worthing Green Infrastructure and Biodiversity SPD, Paragraph 2.6, to insert:
“Worthing experiences significant urban intensification pressures together with opportunities for urban greening, urban canopy enhancement, multifunctional public realm improvements and improved ecological connectivity across the borough.”
Amend the Adur & Worthing Urban Greening TAN tree guidance sections to include:
“Applicants should have regard to relevant arboricultural standards and guidance applicable to the proposal at the relevant time, including BS 5837 and relevant urban tree guidance.”

Entry A68
Respondent:
Worthing Society
Issue Raised:
The respondent emphasised the importance of green infrastructure links, access routes and ecological connectivity across Worthing.
Officer Response:
The councils agree that connectivity is central to multifunctional green infrastructure. The Worthing SPD includes strategic guidance on the green infrastructure network and will be amended to strengthen references to ecological connectivity and proportionate interpretation.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD and Worthing Green Infrastructure and Biodiversity SPD ecological connectivity sections to include:
“Development proposals should consider opportunities to support biodiversity corridors, ecological connectivity and locally appropriate species or habitat enhancement measures where relevant and proportionate to the proposal.”

Entry A69
Respondent:
Worthing Society
Issue Raised:
The respondent supported measures to improve sustainable drainage and climate resilience.
Officer Response:
The councils welcome the support. The SPDs and TANs already address sustainable drainage, climate resilience and multifunctional green infrastructure. Additional amendments relating to sustainable drainage standards, water quality and long-term management are proposed in response to technical consultee comments and will also support this objective.
Action:
No further amendment required.
Amendment:
No further amendment proposed.

Entry A70
Respondent:
Worthing Society
Issue Raised:
The respondent highlighted the importance of ensuring that the guidance is accessible and usable for applicants, residents and decision-makers.
Officer Response:
The councils agree that usability is important. A number of amendments are proposed to improve cross-referencing, summary material and navigation across the documents.
Action:
Amendment proposed.
Amendment:
Amend the Adur & Worthing Urban Greening TAN to include:
“To improve usability and accessibility, summary boxes, diagrams and concise key message sections may be used throughout this TAN to support applicants and decision-makers.”

Entry A71
Respondent:
British Horse Society
Issue Raised:
The respondent requested that green corridors and access routes should consider equestrians, where appropriate.
Officer Response:
The councils agree that where green corridors and open spaces are intended to provide recreational access, the needs of a range of users should be considered where appropriate. This should be subject to site context, safety, design and management considerations.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD and Worthing Green Infrastructure and Biodiversity SPD access, movement and green corridor sections to include:
“Where green corridors and open spaces are intended to provide recreational access, consideration should be given to the needs of a range of users, including walkers, cyclists and equestrians where appropriate having regard to site context, safety, design and management considerations.”

Entry A72
Respondent:
Ferring Conservation Group
Issue Raised:
The respondent supported stronger protection and enhancement of biodiversity, green spaces and ecological networks.
Officer Response:
The councils welcome the support. The SPDs and TANs are intended to support improved green infrastructure, biodiversity and ecological connectivity outcomes through guidance that assists the implementation of adopted policy. The documents cannot introduce new policy designations or requirements, but amendments are proposed to strengthen ecological connectivity guidance.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD and Worthing Green Infrastructure and Biodiversity SPD ecological connectivity sections to include:
“Development proposals should consider opportunities to support biodiversity corridors, ecological connectivity and locally appropriate species or habitat enhancement measures where relevant and proportionate to the proposal.”

Entry A73
Respondent:
Ferring Conservation Group
Issue Raised:
The respondent sought stronger biodiversity net gain requirements and more ambitious ecological outcomes.
Officer Response:
The councils acknowledge the ambition expressed. However, higher biodiversity net gain requirements cannot be introduced through SPDs or TANs. Any requirement above the statutory minimum must be established through adopted development

plan policy and supported by appropriate evidence, consultation and viability testing. The TAN will be amended to clarify this distinction.
Action:
Amendment proposed.
Amendment:
Amend the Adur & Worthing Biodiversity Net Gain TAN to include:
“Any requirement for biodiversity net gain above the statutory minimum must be established through adopted development plan policy and supported by the relevant evidence base. This TAN provides guidance on implementation and does not introduce new biodiversity net gain percentage requirements.”

Entry A74
Respondent:
Green Tides
Issue Raised:
The respondent supported the overall direction of the guidance and highlighted the importance of ecological connectivity, habitat enhancement and community-scale nature recovery.
Officer Response:
The councils welcome the support. The guidance supports ecological connectivity and nature recovery within the scope of adopted policy and supplementary planning guidance. Amendments proposed elsewhere to strengthen ecological connectivity, LNRS signposting and usability will assist in addressing the points raised.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD and Worthing Green Infrastructure and Biodiversity SPD ecological connectivity sections to include:
“Development proposals should consider opportunities to support biodiversity corridors, ecological connectivity and locally appropriate species or habitat enhancement measures where relevant and proportionate to the proposal.”

Entry A75
Respondent:
Friends of Adur SSSI
Issue Raised:
The respondent supported greater recognition of the River Adur corridor, estuarine habitats and the ecological importance of the Adur landscape.
Officer Response:
The councils welcome the support and agree that the Adur SPD should reflect the distinctive ecological and landscape characteristics of the River Adur corridor, estuarine environments and coastal plain.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD, Local Context section, Paragraph 2.2, to insert:
“Adur contains distinctive environmental and landscape characteristics including coastal and estuarine environments, river corridors, floodplain landscapes, urban waterfront areas and strategic green infrastructure connections extending between the coast and the South Downs National Park. Green infrastructure planning should respond positively to these locally distinctive characteristics.”

Entry A76
Respondent:
Friends of Adur SSSI
Issue Raised:
The respondent highlighted opportunities for restoration, improved connectivity, flood resilience and community stewardship in the Old Shoreham valley and wider Adur landscape.
Officer Response:
The councils agree that the Old Shoreham valley forms part of a wider ecological and landscape network linking the Adur valley, coast and South Downs National Park. The guidance should recognise these opportunities where relevant and proportionate.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD, Paragraph 2.14, to insert:

“The Downs-to-coast corridor through the Old Shoreham valley forms part of a wider landscape and ecological network linking the Adur valley, coastal areas and the South Downs National Park. Opportunities for restoration, improved connectivity, flood resilience and community stewardship should be considered where relevant and proportionate.”

Entry A77

Respondent:

Friends of Adur SSSI

Issue Raised:

The respondent emphasised the importance of biodiversity, ecological connectivity and water quality in coastal and estuarine green infrastructure planning.

Officer Response:

The councils agree that coastal and estuarine green infrastructure should have regard to marine biodiversity, ecological connectivity, climate resilience and water quality where relevant. Additional wording is appropriate.

Action:

Amendment proposed.

Amendment:

Amend the Adur Green Infrastructure and Biodiversity SPD, Paragraph 5.28, to insert:

“Coastal and estuarine green infrastructure proposals should have regard to marine biodiversity, ecological connectivity, climate resilience and water quality considerations where relevant.”

Entry A78

Respondent:

Friends of Old Shoreham

Issue Raised:

The respondent supported recognition of the Old Shoreham area as part of a wider landscape, heritage and ecological corridor.

Officer Response:

The councils welcome the support. The Adur SPD will be amended to recognise the wider Downs-to-coast corridor through the Old Shoreham valley and its relationship with restoration, connectivity and flood resilience opportunities.

Action:

Amendment proposed.

Amendment:

Amend the Adur Green Infrastructure and Biodiversity SPD, Paragraph 2.14, to insert:

“The Downs-to-coast corridor through the Old Shoreham valley forms part of a wider landscape and ecological network linking the Adur valley, coastal areas and the South Downs National Park. Opportunities for restoration, improved connectivity, flood resilience and community stewardship should be considered where relevant and proportionate.”

Entry A79

Respondent:

Friends of Old Shoreham

Issue Raised:

The respondent requested that the guidance support community stewardship and local green infrastructure enhancement.

Officer Response:

The councils agree that community stewardship can contribute positively to green infrastructure outcomes where relevant. The SPD can recognise such opportunities while remaining proportionate and within the scope of planning guidance.

Action:

Amendment proposed.

Amendment:

Amend the Adur Green Infrastructure and Biodiversity SPD, Paragraph 2.14, to include:

“Opportunities for restoration, improved connectivity, flood resilience and community stewardship should be considered where relevant and proportionate.”

Entry A80

Respondent:

Sussex Wildlife Trust

Issue Raised:

The respondent welcomed the documents, supported the use of SPDs to explain and support adopted policy, and welcomed references to the Local Nature Recovery Strategy. The respondent suggested that the documents should provide clear links to LNRS website or mapping resources and that key messages should be made more accessible to applicants and decision-makers. The respondent also suggested that summary boxes, diagrams, flow charts or key message boxes could improve

usability. In relation to the Adur & Worthing Biodiversity Net Gain TAN, the respondent emphasised the importance of giving greater prominence to the mitigation hierarchy so that it is clearly understood as a key principle alongside biodiversity net gain.
Officer Response:
The councils welcome the support for the documents and agree that improved signposting and clearer presentation of key messages would assist usability. The documents already provide substantive guidance on the relationship between green infrastructure, biodiversity net gain, urban greening and nature recovery, but additional signposting to LNRS resources and clearer presentation of key messages would improve accessibility without changing the status or policy effect of the documents. The councils also agree that the mitigation hierarchy is a key principle and should be clearly signposted within the Adur & Worthing Biodiversity Net Gain TAN. This amendment does not introduce a new policy requirement but improves clarity and usability for applicants and decision-makers.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD and Worthing Green Infrastructure and Biodiversity SPD to include the following wording in the introductory or LNRS-related sections:
“Where available, digital versions of this SPD may include links to the Local Nature Recovery Strategy website, mapping resources and associated guidance in order to support accessibility and early-stage understanding of nature recovery opportunities.”
Amend the Adur & Worthing Biodiversity Net Gain TAN to include a highlighted key message box in the introductory or mitigation hierarchy section:
“Development proposals should apply the mitigation hierarchy at the earliest appropriate stage of the design process. Biodiversity net gain should be considered alongside the mitigation hierarchy and does not replace the need to avoid, minimise and mitigate ecological harm where applicable.”
Add the following wording to the Adur & Worthing Biodiversity Net Gain TAN:
“To improve usability and accessibility, summary boxes, diagrams and flow charts may be used throughout this TAN to assist applicants and decision-makers in understanding key procedural and assessment stages.”
Add the following wording to the Adur & Worthing Urban Greening TAN:
“To improve usability and accessibility, summary boxes, diagrams and concise key message sections may be used throughout this TAN to support applicants and decision-makers.”

Entry A81
Respondent:
Sompting Parish Council
Issue Raised:
The respondent supported the objectives of improving green infrastructure, biodiversity and ecological connectivity, with particular interest in local green corridors and landscape connections.
Officer Response:
The councils welcome the support. The SPDs provide guidance on green infrastructure and ecological connectivity, and amendments proposed elsewhere will strengthen references to biodiversity corridors and locally appropriate habitat enhancement.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD and Worthing Green Infrastructure and Biodiversity SPD ecological connectivity sections to include:
“Development proposals should consider opportunities to support biodiversity corridors, ecological connectivity and locally appropriate species or habitat enhancement measures where relevant and proportionate to the proposal.”

Entry A82
Respondent:
Drake & Alder Ecology Ltd
Issue Raised:
The respondent raised technical comments regarding biodiversity net gain implementation and the need for clear ecological information requirements.
Officer Response:
The councils agree that biodiversity net gain implementation should be supported by clear, proportionate and technically accurate guidance. Supporting information requirements should remain proportionate to the nature, scale and characteristics of the proposal and consistent with statutory requirements, national guidance and local validation requirements.
Action:

Amendment proposed.
Amendment:
Amend the Adur & Worthing Biodiversity Net Gain TAN validation section to include:
“Supporting information requirements should remain proportionate to the nature, scale and characteristics of the proposal and consistent with adopted local validation requirements, statutory requirements and national guidance applicable at the relevant time.”

Entry A83
Respondent:
Drake & Alder Ecology Ltd
Issue Raised:
The respondent requested clarity regarding ecological competence, metric submissions and biodiversity assessment.
Officer Response:
The councils agree that biodiversity metric assessments and supporting information should be prepared by persons with appropriate ecological expertise and experience relevant to the proposal. The wording should remain proportionate and flexible.
Action:
Amendment proposed.
Amendment:
Amend the Adur & Worthing Biodiversity Net Gain TAN to include:
“Biodiversity information and metric assessments, including Small Sites Metric submissions where applicable, should be prepared by persons with appropriate ecological expertise and experience relevant to the proposal.”

Entry A84
Respondent:
RSPB
Issue Raised:
The respondent supported stronger guidance relating to biodiversity enhancement, ecological connectivity and the mitigation hierarchy.
Officer Response:
The councils welcome the support and agree that the mitigation hierarchy and ecological connectivity should be clearly addressed. Amendments are proposed to strengthen wording on biodiversity corridors and the mitigation hierarchy.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD and Worthing Green Infrastructure and Biodiversity SPD ecological connectivity sections to include:
“Development proposals should consider opportunities to support biodiversity corridors, ecological connectivity and locally appropriate species or habitat enhancement measures where relevant and proportionate to the proposal.”
Amend the Adur & Worthing Biodiversity Net Gain TAN to include:
“Development proposals should have regard to the mitigation hierarchy and seek to avoid, minimise, mitigate and compensate for adverse ecological impacts where applicable having regard to the characteristics of the proposal, site-specific circumstances and statutory requirements applicable at the relevant time.”

Entry A85
Respondent:
RSPB
Issue Raised:
The respondent sought stronger nature recovery outcomes and clear links between biodiversity net gain, ecological networks and strategic opportunity mapping.
Officer Response:
The councils agree that the guidance should support nature recovery, ecological connectivity and appropriate consideration of strategic opportunity mapping. However, the SPDs and TANs cannot introduce new policy requirements or make strategic opportunity mapping determinative. ACIB mapping and other environmental opportunity layers should inform site appraisal and planning judgement rather than predetermine outcomes.
Action:
Amendment proposed.
Amendment:

Amend the Adur Green Infrastructure and Biodiversity SPD, ACIB / environmental opportunity mapping sections, and the Worthing Green Infrastructure and Biodiversity SPD, Paragraph 3.22 / ACIB / environmental opportunity mapping sections, to insert the following wording:
“Environmental opportunity mapping layers, including Areas that Could become of particular Importance for Biodiversity (ACIB) mapping where relevant, identify strategic opportunities which may be relevant to site planning and environmental assessment. Mapping layers should be interpreted proportionately alongside detailed site evidence, adopted policy and other material planning considerations. Inclusion within a mapped layer does not automatically indicate that a particular intervention or outcome is required.”

Entry A86
Respondent:
Individual respondent
Issue Raised:
The respondent supported the general objective of improving green infrastructure and biodiversity outcomes.
Officer Response:
The councils welcome the support. The SPDs and TANs are intended to support improved green infrastructure, biodiversity, biodiversity net gain and urban greening outcomes through guidance that supports adopted policy.
Action:
No amendment required.
Amendment:
No amendment proposed.

Entry A87
Respondent:
Individual respondent
Issue Raised:
The respondent sought stronger protection for existing trees, planting and green spaces.
Officer Response:
The councils recognise the importance of existing trees, planting and green spaces. The SPDs and Urban Greening TAN provide guidance on integrating trees, planting and green infrastructure into development proposals. Amendments are proposed to strengthen signposting to relevant arboricultural standards and urban tree guidance.
Action:
Amendment proposed.
Amendment:
Amend the Adur & Worthing Urban Greening TAN tree guidance sections to include:
“Applicants should have regard to relevant arboricultural standards and guidance applicable to the proposal at the relevant time, including BS 5837 and relevant urban tree guidance.”

Entry A88
Respondent:
Individual respondent
Issue Raised:
The respondent supported additional urban greening, including tree planting, planting within streets and public realm greening.
Officer Response:
The councils welcome the support. The Adur & Worthing Urban Greening TAN provides practical guidance on integrating urban greening measures into development. Additional usability improvements and local context amendments will assist in explaining these opportunities.
Action:
Amendment proposed.
Amendment:
Amend the Adur & Worthing Urban Greening TAN to include:
“To improve usability and accessibility, summary boxes, diagrams and concise key message sections may be used throughout this TAN to support applicants and decision-makers.”

Entry A89
Respondent:
Individual respondent
Issue Raised:
The respondent highlighted the importance of sustainable drainage and flood resilience.
Officer Response:
The councils agree that sustainable drainage and flood resilience are important components of multifunctional green infrastructure. The SPDs already address these matters, and amendments are proposed to strengthen references to national drainage standards, wastewater infrastructure and long-term management.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD, Paragraph 5.14, to include:
“Sustainable drainage proposals should be designed having regard to relevant national standards and guidance applicable at the relevant time, including the Non-Statutory Technical Standards for Sustainable Drainage Systems where relevant.”

Entry A90
Respondent:
Individual respondent
Issue Raised:
The respondent emphasised the importance of access to green spaces and green corridors.
Officer Response:
The councils agree that access to green spaces and green corridors is an important aspect of multifunctional green infrastructure. The guidance supports consideration of access where relevant, subject to site context, safety, design and management considerations.
Action:
Amendment proposed.
Amendment:
Amend the Adur Green Infrastructure and Biodiversity SPD and Worthing Green Infrastructure and Biodiversity SPD access, movement and green corridor sections to include:
“Where green corridors and open spaces are intended to provide recreational access, consideration should be given to the needs of a range of users, including walkers, cyclists and equestrians where appropriate having regard to site context, safety, design and management considerations.”

Entry A91
Respondent:
Individual respondent
Issue Raised:
The respondent sought stronger biodiversity net gain requirements and more ambitious ecological outcomes.
Officer Response:
The councils acknowledge the ambition expressed. However, the SPDs and TANs cannot introduce biodiversity net gain requirements beyond those established through legislation or adopted development plan policy. Any future increase in biodiversity net gain requirements would need to be considered through the Local Plan process and supported by appropriate evidence, consultation and viability testing.
Action:
Amendment proposed.
Amendment:
Amend the Adur & Worthing Biodiversity Net Gain TAN to include:
“Any requirement for biodiversity net gain above the statutory minimum must be established through adopted development plan policy and supported by the relevant evidence base. This TAN provides guidance on implementation and does not introduce new biodiversity net gain percentage requirements.”

Entry A92
Respondent:
Individual respondent
Issue Raised:
The respondent requested that the guidance be clear and easy to use for non-technical readers.
Officer Response:
The councils agree that the documents should be accessible to a range of users, including applicants, residents, officers, consultees and decision-makers. The documents address technical matters, but usability can be improved through summary boxes, diagrams, flow charts and clearer cross-referencing.
Action:
Amendment proposed.
Amendment:
Amend the Adur & Worthing Biodiversity Net Gain TAN to include:
“To improve usability and accessibility, summary boxes, diagrams and flow charts may be used throughout this TAN to assist applicants and decision-makers in understanding key procedural and assessment stages.”
Amend the Adur & Worthing Urban Greening TAN to include:
“To improve usability and accessibility, summary boxes, diagrams and concise key message sections may be used throughout this TAN to support applicants and decision-makers.”