

## Appendix B – Schedule of Amendments Following Consultation

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

General note:

Paragraph references are to the consultation draft documents and should be checked against final publication formatting.

## Amendments to the Adur Green Infrastructure and Biodiversity SPD

Amendment B1
Source location:
Section 1A Introduction and purpose, paragraphs 1.01 to 1.04
Action:
Replace paragraphs 1.01 to 1.04.
Existing wording:
Existing paragraphs 1.01 to 1.04 addressing the purpose of the SPD, the way policies should be applied in practice, the status of the SPD, and use of the term “urban greening”.
Draft Amendment:
<p>Replace paragraphs 1.01 to 1.04 with:</p> <p>“1.01 This Supplementary Planning Document provides guidance to support the implementation of adopted development plan policies relating to green infrastructure, biodiversity, biodiversity net gain, urban greening, trees, green streets and sustainable drainage systems within the Adur Local Plan area. It is intended to assist applicants, officers and decision-makers in considering how development proposals can incorporate multifunctional green infrastructure in a manner proportionate to the scale, nature and context of the proposal.</p> <p>1.02 This SPD 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. It provides guidance on how adopted policies and statutory requirements may be applied in practice.</p> <p>1.03 The guidance should be applied proportionately having regard to site-specific circumstances, adopted policy, technical evidence, viability considerations where relevant and the wider planning balance. Not all parts of the SPD will be relevant to all proposals. It should be applied proportionately and how planning judgement should be exercised when applying the guidance to individual proposals.</p> <p>1.04 For clarity, where this SPD uses the term “urban greening”, it is describing a range of measures and outcomes already supported by adopted Adur Local Plan policies, particularly those relating to design quality, green infrastructure, biodiversity, trees and sustainable drainage. The term is used as contemporary descriptive shorthand and does not introduce new policy requirements.”</p>
Reason:
To strengthen legal clarity, reduce introductory duplication and ensure the SPD is clear that it is guidance supporting adopted policy.

Amendment B2
Source location:
Section 1B Why this SPD is necessary, paragraphs 1.05 to 1.11
Action:
Shorten by replacing paragraphs 1.05 to 1.11.
Existing wording:
Existing Section 1B paragraphs 1.05 to 1.11 explaining why the SPD is necessary.
Draft Amendment:

Replace paragraphs 1.05 to 1.11 with:

“1.05 The Adur Local Plan and, where relevant, the Shoreham Harbour Joint Area Action Plan establish policy requirements relating to green infrastructure, biodiversity, design quality, flood risk, sustainable drainage, climate resilience and the public realm. These policies operate at a strategic level and require practical guidance to support consistent implementation across different sites, scales and development types.

1.06 This SPD helps bridge the gap between adopted policy and practical delivery. It explains how green infrastructure, biodiversity, urban greening, trees and sustainable drainage can be considered from the earliest stages of site appraisal, layout and design, rather than being treated as late-stage mitigation.

1.08 The SPD is intended to support consistent and proportionate decision-making. It should be read alongside adopted policy, national policy and guidance, statutory requirements and the Adur & Worthing Biodiversity Net Gain TAN and Adur & Worthing Urban Greening TAN where relevant.”

Reason:

To reduce background explanation while retaining the purpose of the SPD and the local need for guidance.

Amendment B3

Source location:

Section 1C Adur Local Plan area context and justification, after paragraph 1.16

Action:

Insert after paragraph 1.16.

Existing wording:

Not applicable – insertion only.

Draft Amendment:

Insert the following text after paragraph 1.16:

“The Adur district contains constrained urban areas, redevelopment opportunities and sensitive coastal, river corridor and estuarine contexts where urban greening, tree canopy enhancement, multifunctional public realm improvements and ecological connectivity should be considered where relevant and proportionate. These opportunities should be assessed in the context of site-specific constraints, adopted policy and the wider planning balance.”

Reason:

To ensure that urban greening, tree canopy enhancement, multifunctional public realm improvements and ecological connectivity are recognised as relevant to the Adur district where appropriate.

Amendment B4

Source location:

Section 1D Policy and legislative drivers, after paragraph 1.21

Action:

Insert after paragraph 1.21.

Existing wording:

Not applicable – insertion only.

Draft Amendment:

Insert the following text after paragraph 1.21:

“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.”

Reason:

To clarify that environmental guidance should be applied as part of the wider development plan strategy and planning balance.

Amendment B5
Source location:
Section 1E Scope, proportionality and the role of planning judgement, paragraphs 1.23 to 1.25
Action:
Replace paragraphs 1.23 to 1.25.
Existing wording:
Existing paragraphs 1.23 to 1.25 addressing proportionality, planning judgement and non-uniform application of the SPD.
Draft Amendment:
Replace paragraphs 1.23 to 1.25 with: “1.23 The council recognises that sites vary in size, context, constraints, opportunities and viability. The guidance in this SPD should therefore be applied proportionately, with the level of detail and supporting evidence reflecting the scale and nature of development and the environmental outcomes being sought. 1.24 This SPD supports the exercise of planning judgement; it does not replace it. 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. 1.25 The SPD does not prescribe uniform solutions or standards for all development. References elsewhere in this SPD to proportionality, flexibility and planning judgement should be read in the context of this overarching principle.”
Reason:
To retain the proportionality safeguard while reducing repetition.

Amendment B6
Source location:
Section 1 Introduction, purpose and status, after Table 1: Relationship between legislation, policy and guidance
Action:
Add a new box after Table 1 titled “Related Guidance Documents”.
Existing wording:
Not applicable – insertion only.
Draft Amendment:
Insert the following box after Table 1: “Related Guidance Documents This SPD forms part of a complementary suite of planning guidance documents comprising: Adur Green Infrastructure and Biodiversity SPD Worthing Green Infrastructure and Biodiversity SPD Adur & Worthing Biodiversity Net Gain TAN Adur & Worthing Urban Greening TAN The SPDs provide strategic and place-based green infrastructure and biodiversity guidance. 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.”
Reason:
To improve navigation and clarify the relationship between the SPDs and TANs without duplicating wording elsewhere.

Amendment B7
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Source location:
Section 2A Purpose and role of this section, paragraphs 2.01 to 2.02
Action:
Shorten by replacing paragraphs 2.01 to 2.02.
Existing wording:
Existing paragraphs 2.01 to 2.02 explaining the purpose and role of the policy and legislative context section.
Draft Amendment:
Replace paragraphs 2.01 to 2.02 with: “2.01 This section summarises the policy and legislative context within which this SPD operates. It identifies the principal adopted policy and statutory requirements relevant to green infrastructure, biodiversity, biodiversity net gain, urban greening, trees, green streets and sustainable drainage in the Adur Local Plan area. 2.02 The section is intended to provide context only. It should be read alongside the adopted development plan, national policy and guidance, legislation and the associated Technical Advice Notes where relevant.”
Reason:
To reduce overlong policy context and avoid reproducing material that is available in adopted policy, legislation or national guidance.

Amendment B8
Source location:
Section 2C Green infrastructure policy framework, National policy context and National Green Infrastructure Framework subsections, paragraphs 2.09 to 2.12
Action:
Consolidate by replacing paragraphs 2.09 to 2.12.
Existing wording:
Existing paragraphs 2.09 to 2.12 addressing national policy context and the National Green Infrastructure Framework.
Draft Amendment:
Replace paragraphs 2.09 to 2.12 with: “2.09 National planning policy and Planning Practice Guidance support the planning, protection and enhancement of multifunctional green infrastructure as part of sustainable development, climate resilience, biodiversity recovery, health and wellbeing and high-quality place-making. 2.10 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. 2.11 Where relevant to the proposal, applicants should also 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.”
Reason:
To retain national guidance signposting while reducing detailed background text.

Amendment B9
Source location:
Section 2B The statutory development plan context, after paragraph 2.05
Action:
Insert after paragraph 2.05.

Existing wording:
Not applicable – insertion only.
Draft Amendment:
Insert the following text after paragraph 2.05: “Future strategic planning and policy review relating to Shoreham Harbour will be addressed through the relevant Local Plan review process.”
Reason:
To clarify that future strategic planning and policy review relating to Shoreham Harbour will be addressed through the Local Plan process rather than through supplementary guidance.

Amendment B10
Source location:
Section 2D Biodiversity and biodiversity net gain policy framework, after paragraph 2.24
Action:
Insert after paragraph 2.24.
Existing wording:
Not applicable – insertion only.
Draft Amendment:
Insert the following text after paragraph 2.24: “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. 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.”
Reason:
To improve consistency with marine planning policy and coastal consenting considerations while reflecting the Adur district’s coastal and estuarine context.

Amendment B11
Source location:
Section 2E Statutory biodiversity net gain, National policy alignment, LNRS and wider statutory duties subsection, paragraphs 2.32 to 2.36
Action:
Replace paragraphs 2.32 to 2.36.
Existing wording:
Existing paragraphs 2.32 to 2.36 addressing the NERC Act duty, Local Nature Recovery Strategy, the Adur & Worthing Vision for Nature and strategic nature recovery context.
Draft Amendment:

<p>Replace paragraphs 2.32 to 2.36 with:</p> <p>“2.32 In applying biodiversity policies, the council will have regard to relevant statutory duties, national policy and guidance, and strategic environmental evidence applicable at the relevant time.</p> <p>2.33 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.</p> <p>2.34 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.</p> <p>2.35 The Adur &amp; Worthing Vision for Nature also informs the strategic context for this SPD by identifying locally endorsed priorities for strengthening ecological networks, enhancing green infrastructure connectivity and improving access to nature. It is not a development plan document but provides locally specific evidence and strategic context that may support the application of adopted policies where relevant.”</p>
Reason:
To clarify LNRS status, improve signposting and reduce repeated policy background.

Amendment B12
Source location:
Section 2E Statutory biodiversity net gain, Need for supplementary guidance, proportionality and judgement subsection, paragraphs 2.37 to 2.42
Action:
Replace paragraphs 2.37 to 2.42.
Existing wording:
Existing paragraphs 2.37 to 2.42 addressing the need for supplementary guidance, proportionality, biodiversity net gain and relationship to later sections.
Draft Amendment:
<p>Replace paragraphs 2.37 to 2.42 with:</p> <p>“2.36 Biodiversity net gain should not be treated as a standalone technical exercise disconnected from site design, green infrastructure, ecological connectivity or the mitigation hierarchy. Where statutory biodiversity net gain requirements apply, they should be considered alongside adopted policy, site-specific ecological evidence and the wider green infrastructure context.</p> <p>2.37 Detailed guidance on statutory biodiversity net gain, including applicability, exemptions, thresholds, metric requirements, validation, delivery, securing and monitoring, is provided in the Adur &amp; Worthing Biodiversity Net Gain TAN. This SPD provides the strategic and place-based green infrastructure context within which biodiversity and biodiversity net gain considerations should be understood.”</p>
Reason:
To reduce duplication between the SPD and the BNG TAN.

Amendment B13
Source location:
Section 3 Strategic Green Infrastructure Network, before Map 1: Adur Strategic Green Infrastructure Network
Action:
Insert before Map 1.
Existing wording:
Not applicable – insertion only.
Draft Amendment:

Insert the following text before Map 1:

“The Strategic Green Infrastructure Network combines a range of evidence layers, environmental information and adopted policy considerations to support understanding of the wider green infrastructure context affecting a site. The Network is evidence-led and non-determinative. It does not allocate land, create a new policy designation, operate as a constraint map, create a presumption for or against development or predetermine planning outcomes.”

Reason:

To clarify the evidential and non-determinative status of the Strategic Green Infrastructure Network.

Amendment B14

Source location:

Map 1: Adur Strategic Green Infrastructure Network, map key / legend

Action:

Amend Map 1 alt text

Existing wording:

Existing Map 1 alt text

Draft Amendment:

Add the following note to the Map 1 alt text:

“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.”

Reason:

To improve mapping clarity and avoid deterministic interpretation.

Amendment B15

Source location:

Section 3 Strategic Green Infrastructure Network, Box 2: How the Strategic Green Infrastructure Network should be used

Action:

Replace Box 2.

Existing wording:

Existing Box 2: How the Strategic Green Infrastructure Network should be used.

Draft Amendment:

Replace Box 2 with:

“Box 2: How the Strategic Green Infrastructure Network should be used

The Strategic Green Infrastructure Network should be used as an evidence-led framework to support early site appraisal, environmental understanding and design evolution.

The Network should be interpreted alongside site-specific technical evidence, ecological assessment, adopted policy and other material planning considerations.

The Network does not:

- allocate land
- create a new policy designation
- operate as a constraint map
- create a presumption for or against development
- predetermine planning outcomes
- prescribe fixed site layouts or internal development boundaries
- replace the need for detailed site assessment or professional planning judgement.

Where environmental, movement and green infrastructure layers overlap, the SPD should not be interpreted as creating cumulative mandatory requirements. Relevant considerations should be assessed proportionately having regard to the scale, nature and context of the proposal, adopted policy and site-specific evidence.

Within adopted site allocations, the Strategic Green Infrastructure Network should be used to inform site analysis, environmental assessment and opportunities for integrated green infrastructure delivery. The mapped framework does not alter the principle of development established through adopted allocation policies.”

Reason:

To consolidate Strategic Green Infrastructure Network interpretation safeguards into one clear box and avoid repeated caveats across Section 3.

Amendment B16

Source location:

Section 3I Local indicators of strategic significance in the Adur Local Plan area, after paragraph 3.41

Action:

Insert after paragraph 3.41.

Existing wording:

Not applicable – insertion only.

Draft Amendment:

Insert the following text after paragraph 3.41:

“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.”

Reason:

To clarify the advisory role of ACIB mapping and environmental opportunity mapping.

Amendment B17

Source location:

Section 3I Local indicators of strategic significance in the Adur Local Plan area, after paragraph 3.42

Action:

Insert after paragraph 3.42.

Existing wording:

Not applicable – insertion only.
Draft Amendment:
Insert the following text after paragraph 3.42: “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.”
Reason:
To recognise inclusive and multi-user access considerations.

Amendment B18
Source location:
Section 3I Local indicators of strategic significance in the Adur Local Plan area, after paragraph 3.43
Action:
Insert after paragraph 3.43.
Existing wording:
Not applicable – insertion only.
Draft Amendment:
Insert the following text after paragraph 3.43: “The River Adur 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.”
Reason:
To recognise ecological connectivity and restoration opportunities identified through consultation.

Amendment B19
Source location:
Section 3H Strategic significance and planning assessment, after paragraph 3.37
Action:
Insert after paragraph 3.37.
Existing wording:
Not applicable – insertion only.
Draft Amendment:
Insert the following text after paragraph 3.37: “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.”
Reason:
To strengthen guidance relating to biodiversity corridors and ecological connectivity.

Amendment B20
Document:
Adur Green Infrastructure and Biodiversity SPD
Source location:
Section 4 Biodiversity Net Gain
Action:
Shorten by replacing Section 4.
Existing wording:

Existing Section 4 Biodiversity Net Gain, including Table 5, Box 4, Table 6, Box 5, Box 6 and Box 7.
Draft Amendment:
<p>Replace Section 4 with the following shortened section:</p> <p>“4 Biodiversity Net Gain</p> <p>4A Purpose of this section</p> <p>4.01 This section explains how biodiversity net gain relates to green infrastructure and adopted policy in the Adur Local Plan area. It provides strategic and place-based context only. Detailed technical guidance on statutory biodiversity net gain is provided in the Adur &amp; Worthing Biodiversity Net Gain TAN.</p> <p>4.02 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.</p> <p>4.03 This SPD does not introduce new biodiversity net gain percentage requirements. 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.</p> <p>4B Relationship with green infrastructure</p> <p>4.04 Biodiversity net gain should be considered alongside the wider green infrastructure, ecological connectivity, design and placemaking objectives of adopted policy. Where statutory biodiversity net gain requirements apply, applicants should consider how biodiversity measures can contribute to multifunctional green infrastructure and wider nature recovery objectives where relevant and proportionate.</p> <p>4.05 Biodiversity net gain does not replace the need to apply the mitigation hierarchy. Development proposals should avoid, minimise and mitigate ecological harm where applicable before considering compensation or net gain delivery.</p> <p>4C Technical guidance</p> <p>4.06 Applicants should refer to the Adur &amp; Worthing Biodiversity Net Gain TAN for detailed guidance on:</p> <ul style="list-style-type: none"> <li>when statutory biodiversity net gain applies and when it does not</li> <li>exemptions, thresholds and transitional arrangements</li> <li>use of the statutory biodiversity metric</li> <li>evidence and validation expectations</li> <li>the mitigation hierarchy</li> <li>on-site and off-site biodiversity net gain delivery</li> <li>securing, management, monitoring and Habitat Management and Monitoring Plans</li> </ul> <p>4.07 Detailed evidence, validation and delivery expectations for statutory biodiversity net gain, including the relationship between statutory biodiversity net gain and Worthing Local Plan Policy DM18, are addressed in the Adur &amp; Worthing Biodiversity Net Gain TAN. The general principles on proportionality and planning judgement in Section 1E apply to the use of this SPD.</p> <p>Delete Table 5, Box 4, Table 6, Box 5, Box 6 and Box 7 where their content duplicates the Adur &amp; Worthing Biodiversity Net Gain TAN.</p>
Reason:
To reduce duplication between the SPD and the Adur & Worthing Biodiversity Net Gain TAN while retaining the strategic interface between biodiversity net gain and green infrastructure.

Amendment B21
Source location:
Section 5 Urban greening
Action:
Shorten by replacing Section 5.
Existing wording:
Existing Section 5 Urban greening, including Figure 1 and Box 8.
Draft Amendment:

Replace Section 5 with the following shortened section:

“5 Urban greening

5A Purpose of this section

5.01 Urban greening refers to the integration of trees, planting, green roofs, green walls, sustainable drainage features, biodiversity measures and other green infrastructure into the design of buildings, streets, spaces and development layouts.

5.02 In the Adur district, urban greening is particularly important because many sites are constrained, previously developed or located within established urban areas where opportunities for new green space are limited. Urban greening can support biodiversity, ecological connectivity, climate resilience, surface water management, public realm quality, health and wellbeing.

5.03 Urban greening should be considered from the earliest stages of site appraisal and design. It should be integrated with layout, access, public realm, drainage, biodiversity and long-term management considerations, rather than treated as a residual or decorative measure.

5B Relationship with the Urban Greening TAN

5.04 This SPD provides the strategic and place-based context for urban greening. Detailed guidance on how urban greening should be considered through the design process, what types of measures may be appropriate, what evidence may be required and how long-term management should be addressed is provided in the Adur & Worthing Urban Greening TAN.

5.05 Urban greening opportunities should be considered proportionately having regard to site-specific constraints, technical feasibility, operational requirements, building characteristics, viability considerations and design considerations applicable to the proposal.

5.06 The SPD does not introduce a fixed urban greening metric or new quantitative standard. Urban greening measures should be assessed through adopted policy, site-specific evidence and planning judgement.”

Delete Figure 1 and Box 8 where their content duplicates the Adur & Worthing Urban Greening TAN.

Reason:

To reduce duplication between the SPD and the Adur & Worthing Urban Greening TAN while retaining the strategic importance of urban greening in the Adur district.

Amendment B22

Source location:

Section 6 Trees and green streets

Action:

Shorten by replacing Section 6.

Existing wording:

Existing Section 6 Trees and green streets, including Table 7 and Box 9.

Draft Amendment:

Replace Section 6 with the following shortened section:

“6 Trees and green streets

6A Purpose of this section

6.01 Trees and green streets form an important part of multifunctional green infrastructure. They can contribute to biodiversity, ecological connectivity, shade, cooling, air quality, surface water management, public realm quality, landscape character and health and wellbeing.

6.02 Development proposals should consider existing trees, potential new tree planting and opportunities for green streets from the earliest stages of site appraisal and design. Tree and planting proposals should be appropriate to site context, available space, soil volume, exposure, drainage, long-term management and the intended function of the space.

6.03 The retention, protection and integration of existing trees should be considered in accordance with adopted policy and relevant arboricultural standards and guidance applicable to the proposal at the relevant time.

6B Design and delivery principles

6.04 Tree and green street proposals should be designed to be deliverable, maintainable and capable of long-term performance. Proposals should avoid tokenistic planting where there is insufficient space, soil volume or management provision to support healthy growth.

6.05 Applicants should have regard to relevant arboricultural standards and guidance, including BS 5837 and other relevant urban tree guidance applicable to the proposal at the relevant time.

6.06 Tree and green street measures should be considered alongside the wider green infrastructure, urban greening, sustainable drainage and public realm strategy for the proposal.”

Delete Table 7 and Box 9 where their content duplicates the Adur & Worthing Urban Greening TAN or external arboricultural guidance.

Reason:

To retain the importance of trees and green streets while reducing technical duplication and improving usability.

Amendment B23

Source location:

Section 7 Sustainable Drainage Systems (SuDS) as green infrastructure

Action:

Shorten by replacing Section 7.

Existing wording:

Existing Section 7 Sustainable Drainage Systems (SuDS) as green infrastructure, including Table 8 and Box 10.

Draft Amendment:

Replace Section 7 with the following shortened section:

“7 Sustainable Drainage Systems (SuDS) as green infrastructure

7A Purpose of this section

7.01 Sustainable drainage systems can form an important part of multifunctional green infrastructure where they are designed to manage surface water, support biodiversity, contribute to landscape quality and provide long-term climate resilience.

7.02 In the Adur district, SuDS are particularly important because of flood risk, surface water management pressures, water quality considerations and the relationship between development, coastal and estuarine environments.

7B Design and policy principles

7.03 SuDS should be considered from the earliest stages of site appraisal and design. 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.

7.04 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.

7.05 Green infrastructure and drainage proposals should have regard to water quality considerations and the capacity and operation of wastewater infrastructure where relevant.

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

7C Long-term management

7.07 SuDS and associated green infrastructure should be designed to be maintainable over the lifetime of the development. 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.

7.08 Detailed technical drainage requirements will be considered through relevant flood risk, drainage, building control, statutory consultee and validation processes. This SPD provides planning guidance on how SuDS can contribute to multifunctional green infrastructure and place-making.”

Delete Table 8 and Box 10 where their content duplicates national drainage guidance, technical SuDS standards or local validation processes.

Reason:

To retain SuDS, water quality, wastewater infrastructure and management safeguards while reducing technical duplication.

Amendment B24

Document:

Adur Green Infrastructure and Biodiversity SPD

Source location:

Section 8 Long-term delivery, management, monitoring and enforcement

Action:

Shorten by replacing Section 8.

Existing wording:

Existing Section 8 Long-term delivery, management, monitoring and enforcement, including Table 9 and Box 11.

Draft Amendment:

Replace Section 8 with the following shortened section:

“8 Long-term delivery, management, monitoring and enforcement

8A Purpose of this section

8.01 Green infrastructure, biodiversity, urban greening, trees and sustainable drainage measures must be capable of long-term delivery, management and maintenance if they are to provide lasting benefits.

8.02 The level of information required to demonstrate delivery and management should be proportionate to the nature, scale and complexity of the proposal and the measures being secured.

8B Securing and managing measures

8.03 Where environmental measures are necessary to make development acceptable in planning terms, they may be secured through planning conditions, planning obligations, legal agreements or other appropriate mechanisms having regard to the nature of the proposal, adopted policy and statutory requirements.

8.04 Management and maintenance arrangements should be clear, realistic and capable of implementation. They should identify the measures to be managed, the responsible parties, the expected management period where relevant, and how long-term performance will be maintained.

8.05 Biodiversity net gain delivery, Habitat Management and Monitoring Plans and statutory monitoring requirements are addressed in more detail in the Adur & Worthing Biodiversity Net Gain TAN. Urban greening delivery and management considerations are addressed in more detail in the Adur & Worthing Urban Greening TAN.

8C Planning judgement

8.06 The council will consider long-term delivery and management arrangements proportionately, having regard to the scale, nature and context of the proposal, the significance of the measures proposed and the need to ensure that secured environmental outcomes are deliverable and enforceable.”

Delete Table 9 and Box 11 where their content duplicates the Adur & Worthing Biodiversity Net Gain TAN, Adur & Worthing Urban Greening TAN or other technical implementation guidance.

Reason:

To retain long-term management and enforceability principles while reducing duplication with the TANs.

## Amendments to the Worthing Green Infrastructure and Biodiversity SPD

Amendment B25
Source location:
Section 1A Introduction and purpose, paragraphs 1.01 to 1.04
Action:
Replace paragraphs 1.01 to 1.04.
Existing wording:
Existing paragraphs 1.01 to 1.04 addressing the purpose of the SPD, the way policies should be applied in practice, the status of the SPD, and use of the term “urban greening”.
Draft Amendment:
<p>Replace paragraphs 1.01 to 1.04 with:</p> <p>“1.01 This Supplementary Planning Document provides guidance to support the implementation of adopted development plan policies relating to green infrastructure, biodiversity, biodiversity net gain, urban greening, trees, green streets and sustainable drainage systems within the Worthing Local Plan area. It is intended to assist applicants, officers and decision-makers in considering how development proposals can incorporate multifunctional green infrastructure in a manner proportionate to the scale, nature and context of the proposal.</p> <p>1.02 This SPD 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. It provides guidance on how adopted policies and statutory requirements may be applied in practice.</p> <p>1.03 The guidance should be applied proportionately having regard to site-specific circumstances, adopted policy, technical evidence, viability considerations where relevant and the wider planning balance. Not all parts of the SPD will be relevant to all proposals. It should be applied proportionately and how planning judgement should be exercised when applying the guidance to individual proposals.</p> <p>1.04 For clarity, where this SPD uses the term “urban greening”, it is describing a range of measures and outcomes already supported by adopted Worthing Local Plan policies, particularly those relating to design quality, green infrastructure, biodiversity, trees and sustainable drainage. The term is used as contemporary descriptive shorthand and does not introduce new policy requirements.”</p>
Reason:
To strengthen legal clarity, reduce introductory duplication and ensure the SPD is clear that it is guidance supporting adopted policy.

Amendment B26
Source location:
Section 1B Why this SPD is necessary, paragraphs 1.05 to 1.11
Action:
Shorten by replacing paragraphs 1.05 to 1.11.
Existing wording:
Existing Section 1B paragraphs 1.05 to 1.11 explaining why the SPD is necessary.
Draft Amendment:

Replace paragraphs 1.05 to 1.11 with: “1.05 The Worthing Local Plan establishes policy requirements relating to green infrastructure, biodiversity, design quality, flood risk, sustainable drainage, climate resilience and the public realm. These policies operate at a strategic level and require practical guidance to support consistent implementation across different sites, scales and development types. 1.06 This SPD helps bridge the gap between adopted policy and practical delivery. It explains how green infrastructure, biodiversity, urban greening, trees and sustainable drainage can be considered from the earliest stages of site appraisal, layout and design, rather than being treated as late-stage mitigation. 1.08 The SPD is intended to support consistent and proportionate decision-making. It should be read alongside adopted policy, national policy and guidance, statutory requirements and the Adur & Worthing Biodiversity Net Gain TAN and Adur & Worthing Urban Greening TAN where relevant.”
Reason:
To reduce background explanation while retaining the purpose of the SPD and the local need for guidance.

Amendment B27
Source location:
Section 1C Worthing Local Plan area context and justification, after paragraph 1.16
Action:
Insert after paragraph 1.16.
Existing wording:
Not applicable – insertion only.
Draft Amendment:
Insert the following text after paragraph 1.16: “Worthing borough contains constrained urban areas, redevelopment and intensification pressures, coastal plain landscapes and opportunities for urban greening, tree canopy enhancement, multifunctional public realm improvements and ecological connectivity where relevant and proportionate. These opportunities should be assessed in the context of site-specific constraints, adopted policy and the wider planning balance.”
Reason:
To ensure that urban greening, tree canopy enhancement, multifunctional public realm improvements and ecological connectivity are recognised as relevant to Worthing borough where appropriate.

Amendment B28
Source location:
Section 1D Policy and legislative drivers, after paragraph 1.21
Action:
Insert after paragraph 1.21.
Existing wording:
Not applicable – insertion only.
Draft Amendment:
Insert the following text after paragraph 1.21: “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.”
Reason:
To clarify that environmental guidance should be applied as part of the wider development plan strategy and planning balance.

Amendment B29
Source location:
Section 1E Scope, proportionality and the role of planning judgement, paragraphs 1.23 to 1.25
Action:
Replace paragraphs 1.23 to 1.25.
Existing wording:
Existing paragraphs 1.23 to 1.25 addressing proportionality, planning judgement and non-uniform application of the SPD.
Draft Amendment:
Replace paragraphs 1.23 to 1.25 with: “1.23 The council recognises that sites vary in size, context, constraints, opportunities and viability. The guidance in this SPD should therefore be applied proportionately, with the level of detail and supporting evidence reflecting the scale and nature of development and the environmental outcomes being sought. 1.24 This SPD supports the exercise of planning judgement; it does not replace it. 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. 1.25 The SPD does not prescribe uniform solutions or standards for all development. References elsewhere in this SPD to proportionality, flexibility and planning judgement should be read in the context of this overarching principle.”
Reason:
To retain the proportionality safeguard while reducing repetition.

Amendment B30
Source location:
Section 1 Introduction, purpose and status, after Table 1: Relationship between legislation, policy and guidance
Action:
Add a new box after Table 1 titled “Related Guidance Documents”.
Existing wording:
Not applicable – insertion only.
Draft Amendment:
Insert the following box after Table 1: “Related Guidance Documents This SPD forms part of a complementary suite of planning guidance documents comprising: Adur Green Infrastructure and Biodiversity SPD Worthing Green Infrastructure and Biodiversity SPD Adur & Worthing Biodiversity Net Gain TAN Adur & Worthing Urban Greening TAN The SPDs provide strategic and place-based green infrastructure and biodiversity guidance. 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.”
Reason:
To improve navigation and clarify the relationship between the SPDs and TANs without duplicating wording elsewhere.

Amendment B31
Source location:

Section 2A Purpose and role of this section, paragraphs 2.01 to 2.02
Action:
Shorten by replacing paragraphs 2.01 to 2.02.
Existing wording:
Existing paragraphs 2.01 to 2.02 explaining the purpose and role of the policy and legislative context section.
Draft Amendment:
Replace paragraphs 2.01 to 2.02 with: “2.01 This section summarises the policy and legislative context within which this SPD operates. It identifies the principal adopted policy and statutory requirements relevant to green infrastructure, biodiversity, biodiversity net gain, urban greening, trees, green streets and sustainable drainage in the Worthing Local Plan area. 2.02 The section is intended to provide context only. It should be read alongside the adopted development plan, national policy and guidance, legislation and the associated Technical Advice Notes where relevant.”
Reason:
To reduce overlong policy context and avoid reproducing material that is available in adopted policy, legislation or national guidance.
Appendix A Link:
General usability and proportionality issues.

Amendment B32
Source location:
Section 2C Green infrastructure policy framework, National policy context and National Green Infrastructure Framework subsections, paragraphs 2.09 to 2.12
Action:
Consolidate by replacing paragraphs 2.09 to 2.12.
Existing wording:
Existing paragraphs 2.09 to 2.12 addressing national policy context and the National Green Infrastructure Framework.
Draft Amendment:
Replace paragraphs 2.09 to 2.12 with: “2.09 National planning policy and Planning Practice Guidance support the planning, protection and enhancement of multifunctional green infrastructure as part of sustainable development, climate resilience, biodiversity recovery, health and wellbeing and high-quality place-making. 2.10 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. 2.11 Where relevant to the proposal, applicants should also 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.”
Reason:
To retain national guidance signposting while reducing detailed background text.

Amendment B33
Source location:
Section 2D Biodiversity and biodiversity net gain policy framework, after paragraph 2.21
Action:

Insert after paragraph 2.21.
Existing wording:
Not applicable – insertion only.
Draft Amendment:
Insert the following text after paragraph 2.21:
“Relevant development proposals within coastal 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. Certain forms of coastal 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.”
Reason:
To improve consistency with marine planning policy and coastal consenting considerations while reflecting Worthing borough’s coastal context.

Amendment B34
Source location:
Section 2E Statutory biodiversity net gain, National policy alignment, LNRS and wider statutory duties subsection, paragraphs 2.32 to 2.36
Action:
Replace paragraphs 2.32 to 2.36.
Existing wording:
Existing paragraphs 2.32 to 2.36 addressing the NERC Act duty, Local Nature Recovery Strategy, the Adur & Worthing Vision for Nature and strategic nature recovery context.
Draft Amendment:
Replace paragraphs 2.32 to 2.36 with: “2.32 In applying biodiversity policies, the council will have regard to relevant statutory duties, national policy and guidance, and strategic environmental evidence applicable at the relevant time. 2.33 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. 2.34 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. 2.35 The Adur & Worthing Vision for Nature also informs the strategic context for this SPD by identifying locally endorsed priorities for strengthening ecological networks, enhancing green infrastructure connectivity and improving access to nature. It is not a development plan document but provides locally specific evidence and strategic context that may support the application of adopted policies where relevant.”
Reason:
To clarify LNRS status, improve signposting and reduce repeated policy background.

Amendment B36
Source location:
Section 2E Statutory biodiversity net gain, Relationship between local policy and statutory BNG and Local policy expectations for biodiversity net gain on previously developed land subsections, paragraphs 2.25 to 2.31
Action:
Replace paragraphs 2.25 to 2.31.

Existing wording:
Existing paragraphs 2.25 to 2.31 addressing the relationship between local biodiversity policy, statutory biodiversity net gain and Worthing Policy DM18.
Draft Amendment:
<p>Replace paragraphs 2.25 to 2.31 with:</p> <p>“2.25 The introduction of mandatory biodiversity net gain does not replace or override adopted local plan policies relating to biodiversity. Local plan policies continue to play an important role in addressing matters that sit alongside and interact with biodiversity net gain, including site selection, layout, protection of existing assets, habitat connectivity and long-term management.</p> <p>2.26 Where statutory biodiversity net gain requirements apply, the statutory framework establishes the minimum biodiversity net gain requirement subject to exemptions, thresholds and transitional arrangements. In the Worthing Local Plan area, Policy DM18 establishes a local policy requirement for 20% biodiversity net gain on previously developed land where applicable.</p> <p>2.27 The SPD does not introduce any additional biodiversity net gain requirement beyond legislation or adopted development plan policy. 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.</p> <p>2.28 Biodiversity net gain should not be treated as a standalone technical exercise disconnected from site design, green infrastructure, ecological connectivity or the mitigation hierarchy. Where statutory biodiversity net gain requirements apply, they should be considered alongside adopted policy, site-specific ecological evidence and the wider green infrastructure context.”</p>
Reason:
To clarify the relationship between statutory biodiversity net gain, Worthing Policy DM18 and the role of the SPD, while reducing duplicated statutory BNG explanation.

Amendment B37
Source location:
Section 2E Statutory biodiversity net gain, Need for supplementary guidance, proportionality and judgement subsection, paragraphs 2.37 to 2.42
Action:
Replace paragraphs 2.37 to 2.42.
Existing wording:
Existing paragraphs 2.37 to 2.42 addressing the need for supplementary guidance, proportionality, biodiversity net gain and relationship to later sections.
Draft Amendment:
<p>Replace paragraphs 2.37 to 2.42 with:</p> <p>“2.36 Detailed guidance on statutory biodiversity net gain, including applicability, exemptions, thresholds, metric requirements, validation, delivery, securing and monitoring, is provided in the Adur &amp; Worthing Biodiversity Net Gain TAN. This SPD provides the strategic and place-based green infrastructure context within which biodiversity and biodiversity net gain considerations should be understood.</p> <p>2.37 The overarching principles relating to proportionality, flexibility and the exercise of planning judgement are set out in Section 1 of this SPD and apply throughout this document, including to biodiversity and green infrastructure considerations.”</p>
Reason:
To reduce duplication between the SPD and the BNG TAN.

Amendment B38
Source location:
Section 3 Strategic Green Infrastructure Network, before Map 1: Worthing Strategic Green Infrastructure Network

Action:
Insert before Map 1.
Existing wording:
Not applicable – insertion only.
Draft Amendment:
Insert the following text before Map 1: “The Strategic Green Infrastructure Network combines a range of evidence layers, environmental information and adopted policy considerations to support understanding of the wider green infrastructure context affecting a site. The Network is evidence-led and non-determinative. It does not allocate land, create a new policy designation, operate as a constraint map, create a presumption for or against development or predetermine planning outcomes.”
Reason:
To clarify the evidential and non-determinative status of the Strategic Green Infrastructure Network.

Amendment B39
Source location:
Map 1: Worthing Strategic Green Infrastructure Network, map key / legend
Action:
Amend Map 1 key / legend.
Existing wording:
Existing Countryside and Coast layer in Map 1: Worthing Strategic Green Infrastructure Network. Existing LNRS Measures layer in Map 1: Worthing Strategic Green Infrastructure Network.
Draft Amendment:
Delete the Countryside and Coast layer from Map 1: Worthing Strategic Green Infrastructure Network and from the associated map key / legend. Replace the LNRS Measures layer with the updated Areas that Could become of particular Importance for Biodiversity (ACIB) mapping from the final Local Nature Recovery Strategy. Add the following note to the alt text: “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.”
Reason:
To avoid any discrepancy between the Strategic Green Infrastructure Network mapping and the adopted built-up area boundary, ensure consistency with the final Local Nature Recovery Strategy and improve mapping clarity.

Amendment B40
Source location:
Section 3 Strategic Green Infrastructure Network, Box 2: How the Strategic Green Infrastructure Network should be used
Action:
Replace Box 2.
Existing wording:
Existing Box 2: How the Strategic Green Infrastructure Network should be used.
Draft Amendment:

Replace Box 2 with:

“Box 2: How the Strategic Green Infrastructure Network should be used

The Strategic Green Infrastructure Network should be used as an evidence-led framework to support early site appraisal, environmental understanding and design evolution.

The Network should be interpreted alongside site-specific technical evidence, ecological assessment, adopted policy and other material planning considerations.

The Network does not:

allocate land

create a new policy designation

operate as a constraint map

create a presumption for or against development

predetermine planning outcomes

prescribe fixed site layouts or internal development boundaries

replace the need for detailed site assessment or professional planning judgement.

Where environmental, movement and green infrastructure layers overlap, the SPD should not be interpreted as creating cumulative mandatory requirements. Relevant considerations should be assessed proportionately having regard to the scale, nature and context of the proposal, adopted policy and site-specific evidence.

Within adopted site allocations, the Strategic Green Infrastructure Network should be used to inform site analysis, environmental assessment and opportunities for integrated green infrastructure delivery. The mapped framework does not alter the principle of development established through adopted allocation policies.”

Reason:

To consolidate Strategic Green Infrastructure Network interpretation safeguards into one clear box and avoid repeated caveats across Section 3.

Amendment B41

Source location:

Section 3I Local indicators of strategic significance in the Worthing Local Plan area, after paragraph 3.38

Action:

Insert after paragraph 3.38.

Existing wording:

Not applicable – insertion only.

Draft Amendment:

Insert the following text after paragraph 3.38:

“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.”

Reason:

To clarify the advisory role of ACIB mapping and environmental opportunity mapping.

Amendment B42

Source location:

Section 3I Local indicators of strategic significance in the Worthing Local Plan area, after paragraph 3.39

Action:

Insert after paragraph 3.39.

Existing wording:
Not applicable – insertion only.
Draft Amendment:
Insert the following text after paragraph 3.39: “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.”
Reason:
To recognise inclusive and multi-user access considerations.

Amendment B43
Source location:
Section 3H Strategic significance and planning assessment, after paragraph 3.36
Action:
Insert after paragraph 3.36.
Existing wording:
Not applicable – insertion only.
Draft Amendment:
Insert the following text after paragraph 3.36: “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.”
Reason:
To strengthen guidance relating to biodiversity corridors and ecological connectivity.

Amendment B44
Source location:
Section 4 Biodiversity Net Gain
Action:
Shorten by replacing Section 4.
Existing wording:
Existing Section 4 Biodiversity Net Gain, including Table 5, Box 4, Table 6, Box 5, Box 6 and Box 7.
Draft Amendment:

Replace Section 4 with the following shortened section:

#### “4 Biodiversity Net Gain

##### 4A Purpose of this section

4.01 This section explains how biodiversity net gain relates to green infrastructure, Worthing Local Plan Policy DM18 and adopted policy in the Worthing Local Plan area. It provides strategic and place-based context only. Detailed technical guidance on statutory biodiversity net gain is provided in the Adur & Worthing Biodiversity Net Gain TAN.

4.02 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.

4.03 This SPD does not introduce new biodiversity net gain percentage requirements. 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.

4.04 In the Worthing Local Plan area, Policy DM18 establishes a local policy requirement for 20% biodiversity net gain on previously developed land where applicable. The relationship between statutory biodiversity net gain and Policy DM18 is addressed in more detail in the Adur & Worthing Biodiversity Net Gain TAN.

##### 4B Relationship with green infrastructure

4.05 Biodiversity net gain should be considered alongside the wider green infrastructure, ecological connectivity, design and placemaking objectives of adopted policy. Where statutory biodiversity net gain requirements apply, applicants should consider how biodiversity measures can contribute to multifunctional green infrastructure and wider nature recovery objectives where relevant and proportionate.

4.06 Biodiversity net gain does not replace the need to apply the mitigation hierarchy. Development proposals should avoid, minimise and mitigate ecological harm where applicable before considering compensation or net gain delivery.

##### 4C Technical guidance

4.07 Applicants should refer to the Adur & Worthing Biodiversity Net Gain TAN for detailed guidance on:  
when statutory biodiversity net gain applies and when it does not  
exemptions, thresholds and transitional arrangements

the relationship between statutory biodiversity net gain and Worthing Policy DM18

use of the statutory biodiversity metric

evidence and validation expectations

the mitigation hierarchy

on-site and off-site biodiversity net gain delivery

securing, management, monitoring and Habitat Management and Monitoring Plans

4.08 Detailed evidence, validation and delivery expectations for statutory biodiversity net gain, including the relationship between statutory biodiversity net gain and Worthing Local Plan Policy DM18, are addressed in the Adur & Worthing Biodiversity Net Gain TAN. The general principles on proportionality and planning judgement in Section 1E apply to the use of this SPD.

Delete Table 5, Box 4, Table 6, Box 5, Box 6 and Box 7 where their content duplicates the Adur & Worthing Biodiversity Net Gain TAN.

#### Reason:

To reduce duplication between the SPD and the Adur & Worthing Biodiversity Net Gain TAN while retaining the strategic interface between biodiversity net gain, Worthing Policy DM18 and green infrastructure.

Amendment B45

Source location:

Section 5 Urban greening

Action:
Shorten by replacing Section 5.
Existing wording:
Existing Section 5 Urban greening, including Figure 1 and Box 8.
Draft Amendment:
<p>Replace Section 5 with the following shortened section:</p> <p>“5 Urban greening</p> <p>5A Purpose of this section</p> <p>5.01 Urban greening refers to the integration of trees, planting, green roofs, green walls, sustainable drainage features, biodiversity measures and other green infrastructure into the design of buildings, streets, spaces and development layouts.</p> <p>5.02 In Worthing borough, urban greening is particularly important because many sites are constrained, previously developed or located within established urban areas where opportunities for new green space are limited. Urban greening can support biodiversity, ecological connectivity, climate resilience, surface water management, urban cooling, public realm quality, health and wellbeing.</p> <p>5.03 Urban greening should be considered from the earliest stages of site appraisal and design. It should be integrated with layout, access, public realm, drainage, biodiversity and long-term management considerations, rather than treated as a residual or decorative measure.</p> <p>5B Relationship with the Urban Greening TAN</p> <p>5.04 This SPD provides the strategic and place-based context for urban greening. Detailed guidance on how urban greening should be considered through the design process, what types of measures may be appropriate, what evidence may be required and how long-term management should be addressed is provided in the Adur &amp; Worthing Urban Greening TAN.</p> <p>5.05 Urban greening opportunities should be considered proportionately having regard to site-specific constraints, technical feasibility, operational requirements, building characteristics, viability considerations and design considerations applicable to the proposal.</p> <p>5.06 The SPD does not introduce a fixed urban greening metric or new quantitative standard. Urban greening measures should be assessed through adopted policy, site-specific evidence and planning judgement.”</p> <p>Delete Figure 1 and Box 8 where their content duplicates the Adur &amp; Worthing Urban Greening TAN.</p>
Reason:
To reduce duplication between the SPD and the Adur & Worthing Urban Greening TAN while retaining the strategic importance of urban greening in Worthing borough.

Amendment B46
Source location:
Section 6 Trees and green streets
Action:
Shorten by replacing Section 6.
Existing wording:
Existing Section 6 Trees and green streets, including Table 7 and Box 9.
Draft Amendment:

Replace Section 6 with the following shortened section:

“6 Trees and green streets

6A Purpose of this section

6.01 Trees and green streets form an important part of multifunctional green infrastructure. They can contribute to biodiversity, ecological connectivity, shade, cooling, air quality, surface water management, public realm quality, landscape character and health and wellbeing.

6.02 In Worthing borough, tree canopy enhancement and green streets are particularly important because of constrained urban form, redevelopment and intensification pressures, public realm improvement opportunities and the need to improve climate resilience in established urban areas.

6.03 Development proposals should consider existing trees, potential new tree planting and opportunities for green streets from the earliest stages of site appraisal and design. Tree and planting proposals should be appropriate to site context, available space, soil volume, exposure, drainage, long-term management and the intended function of the space.

6.04 The retention, protection and integration of existing trees should be considered in accordance with adopted policy and relevant arboricultural standards and guidance applicable to the proposal at the relevant time.

6B Design and delivery principles

6.05 Tree and green street proposals should be designed to be deliverable, maintainable and capable of long-term performance. Proposals should avoid tokenistic planting where there is insufficient space, soil volume or management provision to support healthy growth.

6.06 Applicants should have regard to relevant arboricultural standards and guidance, including BS 5837 and other relevant urban tree guidance applicable to the proposal at the relevant time.

6.07 Tree and green street measures should be considered alongside the wider green infrastructure, urban greening, sustainable drainage and public realm strategy for the proposal.”

Delete Table 7 and Box 9 where their content duplicates the Adur & Worthing Urban Greening TAN or external arboricultural guidance.

Reason:

To retain the importance of trees, tree canopy enhancement and green streets while reducing technical duplication and improving usability.

Amendment B47

Source location:

Section 7 Sustainable Drainage Systems (SuDS) as green infrastructure

Action:

Shorten by replacing Section 7.

Existing wording:

Existing Section 7 Sustainable Drainage Systems (SuDS) as green infrastructure, including Table 8 and Box 10.

Draft Amendment:

Replace Section 7 with the following shortened section:

“7 Sustainable Drainage Systems (SuDS) as green infrastructure

7A Purpose of this section

7.01 Sustainable drainage systems can form an important part of multifunctional green infrastructure where they are designed to manage surface water, support biodiversity, contribute to landscape quality and provide long-term climate resilience.

7.02 In Worthing borough, SuDS are particularly important because of surface water management pressures, coastal flood risk, water quality considerations and the need to integrate drainage with constrained urban development and public realm design.

7B Design and policy principles

7.03 SuDS should be considered from the earliest stages of site appraisal and design. 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.

7.04 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.

7.05 Green infrastructure and drainage proposals should have regard to water quality considerations and the capacity and operation of wastewater infrastructure where relevant.

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

7C Long-term management

7.07 SuDS and associated green infrastructure should be designed to be maintainable over the lifetime of the development. 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.

7.08 Detailed technical drainage requirements will be considered through relevant flood risk, drainage, building control, statutory consultee and validation processes. This SPD provides planning guidance on how SuDS can contribute to multifunctional green infrastructure and place-making.”

Delete Table 8 and Box 10 where their content duplicates national drainage guidance, technical SuDS standards or local validation processes.

Reason:

To retain SuDS, water quality, wastewater infrastructure and management safeguards while reducing technical duplication.

Draft Amendment B48

Source location:

Section 8 Long-term delivery, management, monitoring and enforcement

Action:

Shorten by replacing Section 8.

Existing wording:

Existing Section 8 Long-term delivery, management, monitoring and enforcement, including Table 9 and Box 11.

Draft Amendment:

Replace Section 8 with the following shortened section:

“8 Long-term delivery, management, monitoring and enforcement

8A Purpose of this section

8.01 Green infrastructure, biodiversity, urban greening, trees and sustainable drainage measures must be capable of long-term delivery, management and maintenance if they are to provide lasting benefits.

8.02 The level of information required to demonstrate delivery and management should be proportionate to the nature, scale and complexity of the proposal and the measures being secured.

8B Securing and managing measures

8.03 Where environmental measures are necessary to make development acceptable in planning terms, they may be secured through planning conditions, planning obligations, legal agreements or other appropriate mechanisms having regard to the nature of the proposal, adopted policy and statutory requirements.

8.04 Management and maintenance arrangements should be clear, realistic and capable of implementation. They should identify the measures to be managed, the responsible parties, the expected management period where relevant, and how long-term performance will be maintained.

8.05 Biodiversity net gain delivery, Habitat Management and Monitoring Plans and statutory monitoring requirements are addressed in more detail in the Adur & Worthing Biodiversity Net Gain TAN. Urban greening delivery and management considerations are addressed in more detail in the Adur & Worthing Urban Greening TAN.

8C Planning judgement

8.06 The council will consider long-term delivery and management arrangements proportionately, having regard to the scale, nature and context of the proposal, the significance of the measures proposed and the need to ensure that secured environmental outcomes are deliverable and enforceable.”

Delete Table 9 and Box 11 where their content duplicates the Adur & Worthing Biodiversity Net Gain TAN, Adur & Worthing Urban Greening TAN or other technical implementation guidance.

Reason:

To retain long-term management and enforceability principles while reducing duplication with the TANs.

## Adur & Worthing Biodiversity Net Gain TAN amendments

Amendment B49
Source location:
Section 1A Overview, paragraphs 1.01 to 1.07
Action:
Shorten by replacing paragraphs 1.01 to 1.07.
Existing wording:
Existing Section 1A Overview, paragraphs 1.01 to 1.07.
Draft Amendment:
Replace paragraphs 1.01 to 1.07 with: “1.01 This Technical Advice Note provides guidance on the application of statutory biodiversity net gain requirements to development proposals within the Adur Local Plan Area and the Worthing Local Plan Area. It is intended to support applicants, agents, ecologists and planning officers in understanding how the statutory biodiversity net gain framework operates in practice and how it interfaces with adopted planning policy. 1.02 This TAN should be read alongside the Adur Green Infrastructure and Biodiversity SPD, the Worthing Green Infrastructure and Biodiversity SPD, relevant development plan policies, national planning policy and statutory guidance. It does not introduce new planning policy, does not alter statutory requirements and does not replace professional judgement or case-specific assessment. 1.03 This TAN is a material consideration in the determination of planning applications to the extent that it is consistent with adopted policy, statute and national planning guidance. Where there is any conflict, statutory requirements and adopted development plan policies will prevail. 1.04 References in this TAN to legislation, regulations, national policy, biodiversity metric tools, statutory guidance and technical standards should be read as references to the versions applicable to the proposal at the relevant time, including any subsequent updates, replacement guidance or future statutory amendments where relevant. 1.05 Applicants should refer to the most up-to-date statutory biodiversity net gain guidance published by Government, including the statutory biodiversity metric, user guidance and associated regulations. 1.06 In applying statutory biodiversity net gain alongside adopted policy, the councils will also have regard to the West Sussex Local Nature Recovery Strategy and locally endorsed strategic evidence, including the Adur & Worthing Vision for Nature, as material considerations that help identify strategic priorities for nature recovery and connectivity where relevant.”
Reason:
To consolidate the purpose, status and future-proofing wording and avoid repeated references to updated national guidance throughout the TAN.

Amendment B50
Source location:
Section 1B Local policy context and authority-specific requirements, paragraphs 1.08 to 1.11
Action:
Replace paragraphs 1.08 to 1.11.
Existing wording:
Existing Section 1B Local policy context and authority-specific requirements, paragraphs 1.08 to 1.11.
Draft Amendment:
Replace paragraphs 1.08 to 1.11 with:
<p>“1.07 This TAN supports the implementation of biodiversity net gain requirements across both the Adur and Worthing Local Plan Areas. While the statutory biodiversity net gain framework applies consistently in both authorities where applicable, local policy expectations differ.</p> <p>1.08 Where statutory biodiversity net gain requirements apply, the statutory framework establishes the minimum biodiversity net gain requirement subject to exemptions, thresholds and transitional arrangements. In the Worthing Local Plan Area, Policy DM18 establishes a local policy requirement for 20% biodiversity net gain on previously developed land where applicable.</p> <p>1.09 In the Adur Local Plan Area, there is no equivalent adopted policy requirement for biodiversity net gain above the statutory minimum. Proposals that deliver biodiversity net gain above the statutory minimum may be supported where this aligns with site context, design quality and other adopted policy objectives.</p> <p>1.10 This TAN does not introduce any additional biodiversity net gain requirement beyond legislation or adopted development plan policy. 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.”</p>
Reason:
To clarify the relationship between statutory biodiversity net gain, Worthing Local Plan Policy DM18 and the TAN’s guidance role.

Amendment B51
Source location:
Section 2 When statutory biodiversity net gain applies and when it does not, paragraphs 2.01 to 2.17
Action:
Shorten by replacing Section 2.
Existing wording:
Existing Section 2 When statutory biodiversity net gain applies and when it does not, paragraphs 2.01 to 2.17, including the subsections on statutory exemptions, self-build and custom-build development, and significant habitat gains and losses.
Draft Amendment:

Replace Section 2 with:

“2 When statutory biodiversity net gain applies and when it does not

2A Purpose of this section

2.01 This section summarises when statutory biodiversity net gain requirements may apply and when exemptions or transitional arrangements may be relevant. It is intended to support understanding of the statutory framework, but applicants must refer to the legislation, regulations and national guidance applicable to the proposal at the relevant time.

2.02 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.

2.03 Applicants should also have regard to statutory requirements and policy protections relating to priority habitats, protected sites and protected species where applicable.

2B Statutory exemptions and transitional arrangements

2.04 Whether a statutory exemption or transitional arrangement applies is a matter of fact and law and must be assessed on the basis of the specific characteristics of the proposal at the time planning permission is granted.

2.05 The local planning authority does not have discretion to apply or withhold a statutory exemption where the relevant statutory criteria are met. Applicants must provide sufficient information to enable the local planning authority to determine whether an exemption or transitional arrangement applies.

2.06 Categories of development that may be exempt from statutory biodiversity net gain requirements include, but are not limited to, certain householder development, development permitted under the General Permitted Development Order, development falling below the statutory de minimis threshold, certain self-build and custom-build development where statutory criteria are met, and development subject to specific transitional provisions.

2.07 The list in paragraph 2.06 is indicative only and may change through legislation or national guidance. Applicants should refer to the relevant legislation and national guidance applicable to the proposal at the relevant time.

2C Self-build and custom-build development

2.08 Where an applicant considers that a proposal qualifies as self-build or custom-build development for the purposes of a statutory biodiversity net gain exemption, a formal written declaration should be submitted with the planning application confirming the basis on which the exemption is claimed.

2.09 Supporting evidence should be proportionate and sufficient to demonstrate how the statutory criteria are met in the specific circumstances of the proposal. Where baseline biodiversity information is required to assess whether an exemption applies, this does not impose a biodiversity net gain requirement where an exemption lawfully applies.

2D Significant habitat gains and losses

2.10 Habitats of medium or higher distinctiveness are capable of giving rise to significant biodiversity impacts and should be assessed in accordance with the statutory biodiversity metric and guidance applicable to the proposal at the relevant time.

2.11 Habitats of low distinctiveness may also give rise to significant gains or losses where the quantity of habitat affected results in a substantial change in biodiversity unit value. Assessment of significance should be based on the magnitude of unit change, its proportion relative to the site baseline, the functional role of the habitat and professional ecological judgement.”

Reason:

To reduce duplication of national guidance while retaining essential wording on statutory applicability, exemptions, thresholds, transitional arrangements and proportionality.

Amendment B52

Source location:

Figure 1: Overview of the statutory biodiversity net gain process

Action:

Figure amendment.
Existing wording:
Figure 1 includes references to demonstrating required net gain “unless statutory exemption applies” and “stutory delivery hierarchy”.
Draft Amendment:
Amend Figure 1 to correct spelling and statutory terminology as follows:
Replace: “Unless statutory exemption applies” with: “Unless a statutory exemption applies”
Replace: “Apply stutory delivery hierarchy” with: “Apply statutory delivery hierarchy”
Reason:
To correct typographical errors and improve the usability of the statutory process figure.

Amendment B53
Source location:
Section 3D Applying the mitigation hierarchy, after Figure 2: Relationship between the mitigation hierarchy and biodiversity net gain delivery
Action:
Insert after Figure 2.
Existing wording:
Not applicable – insertion only.
Draft Amendment:
Insert the following key message box after Figure 2: “Key message: mitigation hierarchy 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.”
Reason:
To give greater prominence to the mitigation hierarchy and clarify that biodiversity net gain does not replace avoidance, minimisation or mitigation of ecological harm.

Amendment B54
Source location:
Section 3D Applying the mitigation hierarchy, paragraphs 3.07 to 3.12
Action:
Replace paragraphs 3.07 to 3.12.
Existing wording:
Existing paragraphs 3.07 to 3.12 addressing the mitigation hierarchy and its relationship with biodiversity net gain delivery.
Draft Amendment:
Replace paragraphs 3.07 to 3.12 with:

“3.07 The statutory biodiversity net gain framework operates alongside the established mitigation hierarchy of avoid, minimise, mitigate and compensate. The mitigation hierarchy remains central to the assessment of development proposals under adopted planning policy.

3.08 Avoidance of harm to biodiversity should be considered at the earliest stages of site appraisal and design, particularly where existing habitats contribute to ecological connectivity or form part of a wider green infrastructure network.

3.09 Biodiversity net gain calculations should be used to address residual impacts after avoidance, minimisation and mitigation have been considered. Statutory biodiversity net gain does not replace or override the mitigation hierarchy.

3.10 Where statutory biodiversity net gain requirements apply, the statutory delivery framework should be applied in accordance with legislation and national guidance applicable to the proposal at the relevant time. This does not justify avoidable harm or poor site design.”

Reason:

To reduce duplication in the mitigation hierarchy section while retaining the essential safeguard.

Amendment B55

Source location:

Section 4B Requirement to use the statutory biodiversity metric, paragraphs 4.03 to 4.06

Action:

Replace paragraphs 4.03 to 4.06.

Existing wording:

Existing paragraphs 4.03 to 4.06 addressing the statutory biodiversity metric and Small Sites Metric.

Draft Amendment:

Replace paragraphs 4.03 to 4.06 with:

“4.03 Where statutory biodiversity net gain requirements apply, applicants may be required to submit biodiversity metric information and associated supporting documentation in accordance with statutory requirements, metric guidance and national guidance applicable at the relevant time.

4.04 Biodiversity metric calculations must be undertaken using the statutory biodiversity metric, or Small Sites Metric where applicable, in force at the relevant time and in accordance with the relevant user guidance.

4.05 Applicants should not assume that use of the Small Sites Metric removes the need for accurate baseline assessment, application of the mitigation hierarchy, or compliance with adopted planning policies relating to biodiversity protection and enhancement.

4.06 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.”

Reason:

To clarify when biodiversity metric information may be required and to ensure competence expectations remain proportionate.

Amendment B56

Source location:

Section 4D Strategic significance and application of professional judgement, paragraphs 4.10 to 4.14

Action:

Replace paragraphs 4.10 to 4.14.

Existing wording:

Existing paragraphs 4.10 to 4.14 addressing strategic significance and professional judgement.

Draft Amendment:

Replace paragraphs 4.10 to 4.14 with:

“4.10 The statutory biodiversity metric includes an assessment of strategic significance where relevant. Strategic significance should be assessed in accordance with the relevant biodiversity metric guidance and statutory framework applicable to the proposal at the relevant time.

4.11 Strategic opportunity mapping, the Local Nature Recovery Strategy, ACIB mapping and green infrastructure evidence may provide relevant context, but they should not be interpreted as creating additional biodiversity net gain requirements beyond legislation, adopted policy or applicable metric guidance.

4.12 The biodiversity metric provides a quantitative assessment of biodiversity value for the purposes of statutory biodiversity net gain. It does not replace planning judgement, site-specific ecological assessment or the assessment of development proposals against adopted policy.

4.13 Where habitats of strategic significance are present, applicants should demonstrate how the mitigation hierarchy has been applied, with particular emphasis on avoidance and retention where feasible and appropriate.”

Reason:

To clarify the role of strategic significance and avoid creating additional local requirements through guidance.

Amendment B57

Source location:

Section 4H Watercourses, riparian land and development boundaries, after paragraph 4.29

Action:

Insert after paragraph 4.29.

Existing wording:

Not applicable – insertion only.

Draft Amendment:

Insert the following text after paragraph 4.29:

“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.”

Reason:

To clarify the circumstances in which river or watercourse metric information may be required.

Amendment B58

Source location:

Section 5 Evidence requirements and validation, paragraphs 5.01 to 5.20

Action:

Shorten by replacing Section 5.

Existing wording:

Existing Section 5 Evidence requirements and validation, paragraphs 5.01 to 5.20.

Draft Amendment:

Replace Section 5 with:

“5 Evidence requirements and validation

5A Purpose of this section

5.01 This section explains the evidence normally required to support planning applications where statutory biodiversity net gain requirements apply or where an applicant claims that an exemption or transitional arrangement applies.

5.02 The evidence requirements described in this section do not introduce new policy or statutory obligations. 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.

5B Information required at application stage

5.03 Where statutory biodiversity net gain requirements apply, applications should be supported by sufficient information to demonstrate compliance with the statutory framework. This may include, as relevant to the proposal:

a completed statutory biodiversity metric calculation, or Small Sites Metric calculation where applicable  
a baseline habitat plan identifying, mapping and classifying existing habitats within the area affected by the development

proposals for on-site habitat retention, enhancement or creation and, where relevant, off-site delivery arrangements

information explaining how the mitigation hierarchy has been applied

details of how biodiversity net gain will be secured and managed over the required period.

5.04 The level of detail required should be proportionate to the scale, nature and complexity of the development and the biodiversity impacts involved.

5.05 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.

5C Evidence where an exemption is claimed

5.06 Where an applicant considers that a proposal is exempt from statutory biodiversity net gain requirements, sufficient information must be provided to enable the local planning authority to determine whether the exemption applies.

5.07 The purpose of requiring such information is to determine whether an exemption applies. It is not intended to impose biodiversity net gain requirements where an exemption lawfully applies.

5.08 Baseline biodiversity information may still be required for exempt development where necessary and proportionate to enable the authority to assess biodiversity impacts, apply adopted planning policies and determine whether the exemption criteria are met.

5D Validation and proportionality

5.09 Applications that do not provide sufficient information to demonstrate compliance with statutory biodiversity net gain requirements, or to establish that a statutory exemption or transitional arrangement applies, may be invalid or may require further information before determination.

5.10 The local planning authority will apply a proportionate approach to validation, evidence requirements, management arrangements and monitoring obligations, having regard to the scale, nature and complexity of development, the habitats affected and the statutory framework applicable to the proposal at the relevant time.

5.11 Submitted information should be sufficiently clear and accurate to allow planning conditions, the statutory biodiversity gain condition and any associated legal agreements to be framed clearly and enforceably where required.”

Reason:

To reduce validation and evidence narrative while retaining lawful, proportionate and technically accurate requirements.

Amendment B59
Source location:
Section 6B Biodiversity net gain and the mitigation hierarchy, paragraphs 6.03 to 6.05
Action:
Replace paragraphs 6.03 to 6.05.
Existing wording:
Existing paragraphs 6.03 to 6.05 addressing biodiversity net gain and the mitigation hierarchy.
Draft Amendment:
Replace paragraphs 6.03 to 6.05 with: “6.03 Statutory biodiversity net gain does not replace the mitigation hierarchy. Development proposals should apply the mitigation hierarchy at the earliest appropriate stage of the design process by seeking to avoid, minimise and mitigate ecological harm before considering compensation or net gain delivery. 6.04 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. 6.05 Where impacts cannot be avoided, mitigation and compensation should be considered in accordance with adopted policy, site-specific ecological evidence and the statutory framework applicable to the proposal at the relevant time.”
Reason:
To give greater prominence to the mitigation hierarchy and remove duplicated explanation.

Amendment B60
Source location:
Section 6C Strategic context and strategic significance, paragraphs 6.06 to 6.08
Action:
Replace paragraphs 6.06 to 6.08.
Existing wording:
Existing paragraphs 6.06 to 6.08 addressing strategic context and strategic significance.
Draft Amendment:
Replace paragraphs 6.06 to 6.08 with: “6.06 Strategic significance should be assessed in accordance with the relevant biodiversity metric guidance and statutory framework applicable to the proposal at the relevant time. 6.07 Strategic opportunity mapping, the Local Nature Recovery Strategy, ACIB mapping and green infrastructure evidence may provide relevant context, but they should not be interpreted as creating additional biodiversity net gain requirements beyond legislation, adopted policy or applicable metric guidance. 6.08 The identification of land for biodiversity net gain purposes, whether on-site or off-site, does not allocate land for development or conservation purposes and does not predetermine the outcome of any planning application.”
Reason:
To clarify the role of strategic significance and avoid creating additional local requirements through guidance.

Amendment B61
Source location:
Section 6D Prioritising on-site delivery and Section 6E Off-site delivery of biodiversity net gain, paragraphs 6.09 to 6.19
Action:
Shorten by replacing paragraphs 6.09 to 6.19.
Existing wording:

Existing paragraphs 6.09 to 6.19 addressing prioritising on-site delivery, off-site delivery and related delivery considerations.
Draft Amendment:
<p>Replace paragraphs 6.09 to 6.19 with:</p> <p>“6.09 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.</p> <p>6.10 On-site delivery may include retention, enhancement or creation of habitats within the development site, including within public realm, open space, landscape, drainage and green infrastructure areas where this is ecologically appropriate and deliverable.</p> <p>6.11 On-site delivery should not be treated as automatically preferable in all circumstances. Applicants should consider whether proposed habitats are viable, maintainable and capable of achieving the intended biodiversity outcomes over the required period.</p> <p>6.12 Off-site biodiversity net gain delivery mechanisms may be appropriate where permitted through the statutory framework and justified by site-specific circumstances.</p> <p>6.13 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.</p> <p>6.14 Where off-site delivery is proposed, applicants should explain why this approach is appropriate having regard to the mitigation hierarchy, site constraints, ecological effectiveness, statutory delivery requirements and strategic biodiversity priorities where relevant.”</p>
Reason:
To clarify that on-site delivery is not always required or preferable and that off-site delivery may be appropriate where permitted through the statutory framework.

Amendment B62
Source location:
Section 6G Securing delivery, management and monitoring, paragraphs 6.22 to 6.24
Action:
Replace paragraphs 6.22 to 6.24.
Existing wording:
Existing paragraphs 6.22 to 6.24 addressing securing delivery, management and monitoring.
Draft Amendment:
<p>Replace paragraphs 6.22 to 6.24 with:</p> <p>“6.22 Where biodiversity net gain is proposed to be delivered on-site or off-site, applicants should demonstrate that habitat creation, enhancement, management and monitoring arrangements are realistic, deliverable and proportionate to the proposal.</p> <p>6.23 The mechanism for securing delivery will depend on the circumstances of the proposal and may include the statutory biodiversity gain condition, planning conditions, section 106 obligations, conservation covenants or other mechanisms permitted through the statutory framework applicable to the proposal at the relevant time.</p> <p>6.24 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.”</p>
Reason:
To clarify securing mechanisms and ensure HMMP wording is necessary and proportionate.

Amendment B63
Source location:
Section 6H Relationship to planning judgement and policy, after paragraph 6.26
Action:
Insert after paragraph 6.26.
Existing wording:
Not applicable – insertion only.
Draft Amendment:
Insert the following text after paragraph 6.26: “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.”
Reason:
To reinforce proportionality in the application of biodiversity net gain guidance.

Draft Amendment B64
Source location:
Section 7C Planning conditions and section 106 obligations, paragraphs 7.05 to 7.07
Action:
Replace paragraphs 7.05 to 7.07.
Existing wording:
Existing paragraphs 7.05 to 7.07 addressing planning conditions and section 106 obligations.
Draft Amendment:
Replace paragraphs 7.05 to 7.07 with: “7.05 Biodiversity net gain delivery, management and monitoring arrangements may be secured through planning conditions, legal agreements, conservation covenants or other mechanisms as appropriate having regard to the proposal and the statutory framework applicable at the relevant time. 7.06 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. 7.07 Applicants should not assume that all matters can be secured solely through planning conditions. Early discussion of likely legal mechanisms is encouraged to avoid delay.”
Reason:
To clarify that securing mechanisms should be selected having regard to the proposal, land ownership arrangements and statutory framework.

Amendment B65
Source location:
Section 7E Habitat management and monitoring plans, paragraphs 7.10 to 7.11
Action:
Replace paragraphs 7.10 to 7.11.
Existing wording:
Existing paragraphs 7.10 to 7.11 addressing Habitat Management and Monitoring Plans.
Draft Amendment:

Replace paragraphs 7.10 to 7.11 with: “7.10 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. 7.11 Where a Habitat Management and Monitoring Plan is required, it should clearly identify the habitats to be created, enhanced or managed, the management objectives, responsible parties, funding arrangements, monitoring intervals, reporting arrangements, access for management and monitoring, and triggers for remedial action where necessary.”
Reason:
To avoid implying that Habitat Management and Monitoring Plans are universally required and to ensure the guidance remains proportionate.

Amendment B66
Source location:
Section 7F Monitoring, reporting and monitoring fees, paragraphs 7.12 to 7.15
Action:
Shorten by replacing paragraphs 7.12 to 7.15.
Existing wording:
Existing paragraphs 7.12 to 7.15 addressing monitoring, reporting, monitoring fees and land transfer.
Draft Amendment:
Replace paragraphs 7.12 to 7.15 with: “7.12 Monitoring and reporting requirements should be proportionate to the biodiversity measures proposed, the securing mechanism used and the statutory framework applicable to the proposal at the relevant time. 7.13 Where monitoring is required, monitoring reports should be prepared by suitably qualified persons and submitted at agreed intervals. Monitoring arrangements should enable the local planning authority to assess whether approved biodiversity outcomes are being delivered and maintained. 7.14 Where monitoring fees are necessary, they should relate to the reasonable costs of monitoring compliance with secured biodiversity net gain obligations.”
Reason:
To reduce monitoring and reporting detail while retaining the need for proportionate and enforceable monitoring arrangements.

Amendment B66
Source location:
Section 7H Relationship to planning judgement and viability, paragraphs 7.18 to 7.19
Action:
Replace paragraphs 7.18 to 7.19.
Existing wording:
Existing paragraphs 7.18 to 7.19 addressing planning judgement and viability.
Draft Amendment:

Replace paragraphs 7.18 to 7.19 with:

“7.18 The local planning authority recognises that sites vary in scale, context, complexity, constraints and delivery mechanisms. Securing biodiversity net gain should be considered early in scheme design to ensure that delivery, management and monitoring arrangements are realistic, proportionate and capable of implementation.

7.19 Flexibility in delivery approach does not remove the requirement to secure statutory biodiversity net gain where it applies. Applicants proposing alternative delivery mechanisms, phasing or off-site delivery should demonstrate that the approach is consistent with the statutory framework applicable to the proposal at the relevant time and capable of securing the required biodiversity outcomes.”

Reason:

To retain proportionality and flexibility while confirming that statutory biodiversity net gain must still be secured where it applies.

## Adur & Worthing Urban Greening TAN amendments

Amendment B67
Source location:
Section 1 Purpose, status and relationship to policy, paragraphs 1.01 to 1.11
Action:
Shorten by replacing paragraphs 1.01 to 1.11.
Existing wording:
Existing Section 1 Purpose, status and relationship to policy, paragraphs 1.01 to 1.11.
Draft Amendment:
<p>Replace paragraphs 1.01 to 1.11 with:</p> <p>“1.01 This Technical Advice Note provides guidance on the interpretation and implementation of adopted planning policy relating to urban greening within the Adur Local Plan Area and the Worthing Local Plan Area. It is intended to support applicants, agents, designers and planning officers in understanding how urban greening can be integrated into development proposals and assessed through the planning process.</p> <p>1.02 This TAN should be read alongside the Adur Green Infrastructure and Biodiversity SPD, the Worthing Green Infrastructure and Biodiversity SPD, relevant development plan policies and national planning policy and guidance. It does not introduce new planning policy, new standards or new quantitative requirements, and does not alter or override statutory or development plan obligations.</p> <p>1.03 The TAN provides technical guidance on design-led approaches to urban greening, evidence expectations, delivery and long-term management. It is intended to support consistent interpretation and application of adopted policy while allowing for site-specific design responses and planning judgement.</p> <p>1.04 Urban greening is used in this TAN as a collective term for measures that integrate vegetation and nature-based features into development. This includes, where appropriate, trees, planting, green roofs, brown roofs, green walls, sustainable drainage features, biodiversity-supporting planting, public realm greening and other multifunctional green infrastructure.</p> <p>1.05 The TAN adopts an outcome-led approach. Unlike statutory biodiversity net gain, there is no nationally prescribed metric for measuring urban greening. Proposals are assessed through their quality, functionality, integration, deliverability and long-term performance in supporting adopted development plan objectives.</p> <p>1.06 The guidance in this TAN is intended to support, not fetter, the exercise of planning judgement. It recognises that sites vary in size, context, constraints and opportunities, and that appropriate urban greening solutions will differ accordingly.</p> <p>1.07 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.</p> <p>1.08 References in this TAN to legislation, national policy, guidance and technical standards should be read as references to the versions applicable to the proposal at the relevant time, including any subsequent updates or replacement guidance where relevant.”</p>
Reason:
To reduce duplication in the introductory section, clarify the relationship between the TAN and the SPDs, improve best-practice signposting and retain legal safeguards.

Amendment B68
Source location:
Section 2 When urban greening guidance applies, paragraphs 2.01 to 2.18
Action:

Shorten by replacing Section 2.

Existing wording:

Existing Section 2 When urban greening guidance applies, paragraphs 2.01 to 2.18.

Draft Amendment:

Replace Section 2 with:

“2 When urban greening guidance applies

2A Purpose of this section

2.01 This section explains when urban greening guidance is likely to be relevant and how a proportionate approach will be taken in practice.

2.02 Urban greening is relevant to a wide range of development types and scales, but the level of detail expected will vary depending on the nature, scale, location and potential impacts of the proposal. This TAN should not be read as applying the same expectations to all development.

2B Development where urban greening is most relevant

2.03 Urban greening guidance is most likely to be relevant where development proposals have the potential to affect the quality, function or character of the urban environment, or where greening plays an important role in mitigating impacts or delivering adopted policy objectives.

2.04 The guidance will normally be most relevant to:

major residential, commercial and mixed-use development

dense urban environments or constrained sites

proposals involving significant areas of hard surfacing, building coverage or public realm

schemes that include or affect streets, squares, courtyards or shared spaces

development in locations affected by heat risk, surface water flooding, coastal exposure or water quality pressures

regeneration, intensification or redevelopment schemes where urban greening is integral to placemaking and environmental quality.

2C Smaller-scale development and proportionality

2.05 For smaller-scale development, including minor development and changes of use, urban greening guidance will be applied proportionately. Not all applications will require detailed greening strategies or extensive supporting information.

2.06 For smaller proposals, urban greening considerations may be addressed through simpler measures such as retaining existing vegetation, modest planting or design choices that avoid unnecessary loss of greening opportunities. The absence of large-scale greening interventions will not in itself indicate non-compliance where opportunities have been reasonably considered and explained.

2.07 Householder development will generally fall outside the scope of this TAN, except where it forms part of a wider scheme or has implications for shared spaces, street environments or cumulative impacts.

2D Site constraints and planning judgement

2.08 The councils recognise that site constraints such as land ownership, underground services, contamination, flood risk, coastal exposure, access requirements, operational requirements and viability considerations can affect the extent and form of urban greening that can be delivered.

2.09 Where constraints limit greening opportunities, applicants should explain how those constraints have influenced design decisions and how reasonable opportunities for greening have been explored and maximised within those constraints.

2.10 Urban greening opportunities should be considered proportionately having regard to site-specific constraints, technical feasibility, operational requirements, building characteristics, viability considerations and design considerations applicable to the proposal.

2.11 The application of this TAN relies on planning judgement. The councils will assess urban greening proposals having regard to site context, adopted policy objectives, proportionality and deliverability, rather than against predetermined numerical standards.

2E Key messages for applicants and decision-makers

2.12 Urban greening guidance should be applied proportionately having regard to the nature, scale, location and constraints of the proposal.

2.13 Not all forms of development will require the same level of urban greening detail or supporting information.

2.14 Urban greening should support adopted policy objectives and should not be interpreted as introducing new policy requirements or fixed quantitative standards.

2.15 Planning judgement remains essential.”

Reason:

To improve usability, consolidate proportionality wording and avoid multiple overlapping key message boxes.

Amendment B69

Source location:

Section 3 Urban greening as a design-led process, paragraphs 3.01 to 3.23

Action:

Shorten by replacing Section 3.

Existing wording:

Existing Section 3 Urban greening as a design-led process, paragraphs 3.01 to 3.23.

Draft Amendment:

Replace Section 3 with:

“3 Urban greening as a design-led process

3A Purpose of this section

3.01 Urban greening should be considered as an integral, design-led component of development proposals rather than as a residual or decorative element. It should inform site appraisal, layout, massing, access, public realm, drainage and long-term management considerations.

3.02 The guidance in this section supports high-quality, context-responsive design. It does not prescribe specific design solutions and does not introduce quantitative requirements.

3B Early site appraisal and layout

3.03 Effective urban greening begins at the earliest stages of site appraisal and concept design.

Applicants should consider greening opportunities alongside decisions relating to site capacity, access, layout, massing, drainage and public realm.

3.04 Early consideration should include an understanding of the site’s existing environmental characteristics, including microclimate, exposure, topography, soil conditions, flood risk, existing vegetation, watercourses, surrounding urban form and opportunities for ecological connectivity.

3.05 Applicants should demonstrate how the proposed layout and massing have been informed by urban greening objectives, particularly where development intensity is high or where the site is subject to climate-related risks such as overheating or surface water flooding.

3C Ground-based greening and other measures

3.06 Where feasible, ground-based greening is generally the most effective and resilient form of urban greening because it can provide cooling, biodiversity support, water infiltration, usable space and public realm benefits.

3.07 In constrained urban locations, opportunities for ground-based greening may be limited. In such cases, applicants should demonstrate that reasonable opportunities have been explored and maximised, rather than assuming from the outset that ground-based greening is not possible.

3.08 Green roofs, brown roofs, green walls and similar measures can play an important role where ground-level opportunities are constrained. They should normally complement, rather than replace, ground-based greening where ground-based greening is achievable.

3.09 Urban greening should be integrated with other aspects of design, including sustainable drainage, street design, movement networks, public realm, biodiversity support and building performance.

Multifunctional approaches are encouraged where they enhance overall outcomes and do not compromise primary functions.

3D Avoiding tokenistic or residual greening

3.10 Applicants should avoid treating urban greening as a residual component introduced after key design decisions have been made. Proposals that rely predominantly on narrow strips of planting, isolated planters or areas with no clear function or management strategy are unlikely to be supported unless clearly justified by site constraints.

3.11 Urban greening proposals should be intentional, coherent and capable of delivering meaningful benefits over time, rather than serving a purely decorative purpose.

3E Key messages for applicants and decision-makers

3.12 Urban greening should be considered from the earliest stages of site appraisal and design.

3.13 Greening should be integrated with layout, massing, access, sustainable drainage, public realm and long-term management considerations.

3.14 Ground-based greening should be considered where feasible, but site-specific constraints, technical feasibility and design quality remain important.

3.15 Urban greening should avoid tokenistic or residual measures and should be capable of delivering meaningful long-term benefits.”

Reason:

To consolidate overlapping design-process guidance and improve usability while retaining the substantive design-led approach.

Amendment B70

Source location:

Section 4 What constitutes effective urban greening in Adur and Worthing, paragraphs 4.01 to 4.28, Table 1 and Table 2

Action:

Shorten by replacing Section 4 and deleting Table 1.

Existing wording:

Existing Section 4 What constitutes effective urban greening in Adur and Worthing, paragraphs 4.01 to 4.28, Table 1 and Table 2.

Draft Amendment:

Replace Section 4 with:

“4 What constitutes effective urban greening in Adur and Worthing

4A Purpose of this section

4.01 This section explains the characteristics of effective urban greening within the environmental, spatial and climatic context of Adur and Worthing. It focuses on the qualities of greening that are most likely to deliver meaningful benefits and support adopted policy objectives.

4.02 Effective urban greening should be functional, well-integrated and capable of long-term management. It should be selected and designed having regard to local context, exposure, soil conditions, water management, biodiversity value, maintenance requirements and the intended use of the space.

4B Local context and challenges

4.03 Adur and Worthing are characterised by tightly constrained urban form, a strong coastal influence, proximity to the South Downs and a limited supply of undeveloped land. Much new development therefore takes place through intensification, regeneration or redevelopment rather than urban expansion.

4.04 These characteristics create challenges for urban greening, including limited space at ground level, competing demands on the public realm, exposure to wind and salt spray, surface water management pressures and increasing risks associated with overheating and climate change.

4.05 These constraints make the quality, integration and functionality of urban greening especially important. Small, fragmented or poorly designed interventions are unlikely to deliver meaningful benefits, whereas well-considered greening can make a positive contribution to environmental quality, resilience and placemaking.

#### 4C Ground-based greening, trees and usable green space

4.06 Where feasible, ground-based greening is generally the most effective form of urban greening. It can support microclimate regulation, water infiltration, biodiversity, public realm quality and everyday use.

4.07 Trees are a particularly important component of effective urban greening in Adur and Worthing, contributing to cooling, air quality, visual amenity, biodiversity support and placemaking. The benefits delivered by trees depend heavily on their ability to establish successfully and thrive over time.

4.08 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.

4.09 Tree planting and other greening measures should be designed with sufficient space, soil volume, rooting conditions, water availability, protection and long-term management arrangements to support healthy establishment and growth.

#### 4D Green roofs, brown roofs and green walls

4.10 Green roofs, brown roofs and green walls can make a valuable contribution to urban greening where ground-level opportunities are constrained. They should be designed to complement ground-based greening where feasible and to deliver meaningful environmental or placemaking outcomes.

4.11 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.

4.12 In coastal locations, careful consideration should be given to exposure, wind, salt spray, planting selection, structural capacity and maintenance access to ensure long-term performance.

#### 4E Sustainable drainage, climate resilience and connectivity

4.13 Urban greening should, where appropriate, be integrated with sustainable drainage systems in order to deliver multifunctional benefits. Greening associated with drainage features should be designed to function effectively as part of the drainage system and should not compromise the primary drainage function of SuDS features.

4.14 Urban greening can contribute to climate resilience by supporting cooling, shade, surface water interception, biodiversity and public realm quality. These benefits are most likely to be achieved where greening is well-integrated and designed with local conditions in mind.

4.15 Effective urban greening is not solely about the amount of planted area but about coherence, connectivity and relationship to how spaces are used. Greening that contributes to a connected network of streets, spaces and routes is more likely to deliver lasting benefits.

#### 4F Avoiding tokenistic or non-functional greening

4.16 Urban greening proposals that rely primarily on small planters, narrow strips of planting or inaccessible areas with no clear function or management strategy are unlikely to be effective in the local context.

4.17 In constrained locations, applicants should demonstrate how reasonable greening opportunities have been explored and maximised. Urban greening measures should be proportionate, deliverable and capable of long-term management."

Delete Table 1: Ground-based and roof-based greening - functional comparison.

Retain Table 2: Forms of urban greening and their functional contribution, but amend the "Green walls and façade greening" row so that the key design considerations and limitations column reads:

"Structural feasibility, building safety requirements, irrigation, maintenance access, long-term management, visual impact and operational practicality should be considered. Certain systems may not be appropriate for all building types or heights, including some residential buildings above 11 metres."

#### Reason:

To consolidate overlapping material between Sections 3 and 4, retain guidance on effective urban greening measures, strengthen feasibility wording for green walls and reduce unnecessary length.

Amendment B71
Source location:
Table 2: Forms of urban greening and their functional contribution
Action:
Table amendment.
Existing wording:
Existing Table 2 row for “Green walls and façade greening”.
Draft Amendment:
Amend the “Green walls and façade greening” row in Table 2 so that it reads: “Form of Urban Greening: Green walls and façade greening Primary Functional Contribution: Visual greening; localised microclimate benefits; contribution to design quality; potential contribution to urban cooling and biodiversity where designed and managed appropriately. Key Design Considerations and Limitations: Structural feasibility, building safety requirements, irrigation, maintenance access, long-term management, visual impact and operational practicality should be considered. Certain systems may not be appropriate for all building types or heights, including some residential buildings above 11 metres.”
Reason:
To clarify that green wall systems require site-specific consideration of feasibility, safety, maintenance and operational practicality.

Amendment B72
Source location:
Section 5 Evidence and submission expectations, paragraphs 5.01 to 5.20 and Table 3
Action:
Shorten by replacing Section 5 and Table 3.
Existing wording:
Existing Section 5 Evidence and submission expectations, paragraphs 5.01 to 5.20 and Table 3: Typical information requirements for urban greening.
Draft Amendment:
Replace Section 5 and Table 3 with: “5 Evidence and submission expectations 5A Purpose of this section 5.01 This section explains the information applicants may need to provide to demonstrate how urban greening has been considered, integrated and delivered as part of development proposals. 5.02 The evidence expectations in this section do not introduce new policy requirements. They explain the information typically needed to assess compliance with adopted policy and to support proportionate planning judgement. 5B Proportionate evidence 5.03 Urban greening evidence should be proportionate to the scale, nature and complexity of the proposal and the extent to which urban greening is relevant to the development. 5.04 Plans and supporting information should clearly show how urban greening has influenced the design of the proposal. 5.05 Where urban greening opportunities are constrained, applicants should explain the relevant constraints and how reasonable opportunities have been explored. 5.06 Supporting information should be clear, focused and consistent with other environmental information submitted with the application. 5C Typical information 5.07 Depending on the nature and scale of the proposal, relevant information may include:

site layout plans showing existing and proposed greening  
landscape or public realm plans identifying greening features  
sections or details showing soil depth, levels, rooting volumes or planting zones where relevant  
information explaining how greening integrates with drainage, biodiversity, public realm and site layout  
details of green roofs, brown roofs, green walls or other structural greening where proposed  
information on long-term management and maintenance where significant or complex greening  
measures are proposed.

5.08 For minor development, information may be limited to a site plan and brief explanation of the proposed greening approach where relevant.

5.09 For small to medium development, information may include a landscape or public realm plan, indicative planting schedule and explanation of how greening integrates with site layout and drainage.

5.10 For major, strategic or complex development, information may include a more comprehensive landscape, public realm or green infrastructure strategy with proportionate detail on design, delivery and long-term management.

5D Validation and decision-making

5.11 The local planning authority will apply a proportionate approach to validation and assessment, having regard to the scale of development and the relevance of urban greening to the proposal.

5.12 Applications should provide sufficient information to enable the local planning authority to understand the proposed approach and assess whether urban greening has been integrated in a meaningful and realistic way.”

Delete Table 3: Typical information requirements for urban greening, as its content is incorporated into the shortened Section 5.

Reason:

To convert evidence expectations into a concise checklist-style section and reduce duplication.

Amendment B73

Source location:

Section 6 Delivery, management and long-term considerations, paragraphs 6.01 to 6.20

Action:

Shorten by replacing Section 6.

Existing wording:

Existing Section 6 Delivery, management and long-term considerations, paragraphs 6.01 to 6.20, including repeated wording in paragraph 6.18.

Draft Amendment:

Replace Section 6 with:

“6 Delivery, management and long-term considerations

6A Purpose of this section

6.01 Urban greening measures must be capable of delivery, management and maintenance over time if they are to provide lasting benefits.

6.02 The level of detail required to demonstrate delivery and management should be proportionate to the nature, scale and complexity of the proposal and the greening measures proposed.

6B Delivery and implementation

6.03 Urban greening should be considered early in the design process so that proposed measures are realistic, coordinated with other technical requirements and capable of implementation.

6.04 Proposals should avoid relying on greening measures that cannot reasonably be delivered because of inadequate space, soil volume, structural capacity, maintenance access, irrigation, drainage arrangements or management responsibility.

6C Management and maintenance

6.05 Where significant or complex urban greening measures are proposed, applicants should provide sufficient information to demonstrate that they can be maintained and managed appropriately.

6.06 This may include, where proportionate:  
 identification of management responsibilities  
 indicative maintenance approaches  
 confirmation that access for maintenance has been considered  
 arrangements for replacement planting or remedial action where necessary.

6.07 Where greening measures serve multiple functions, such as drainage, cooling, biodiversity support and visual amenity, management approaches should reflect this multifunctionality and avoid undermining primary functions.

6D Securing long-term outcomes

6.08 Where long-term management arrangements are required to secure policy outcomes, these matters may be addressed through planning conditions, planning obligations, legal agreements or other appropriate mechanisms in accordance with the relevant SPD and adopted policy.

6.09 The councils will consider delivery and management arrangements proportionately, having regard to the scale, nature and context of the proposal, the significance of the greening measures proposed and the need to ensure that secured outcomes are realistic and enforceable.

6.10 This TAN does not introduce new policy requirements. It explains how delivery, management and long-term considerations may be addressed in practice to support the implementation of adopted policy.”

Reason:

To remove repeated wording and retain substantive guidance on long-term delivery, management and maintenance.

Amendment B74

Source location:

Section 7 Common issues and clarifications, paragraphs 7.01 to end of section

Action:

Shorten by replacing Section 7.

Existing wording:

Existing Section 7 Common issues and clarifications, paragraphs 7.01 to end of section.

Draft Amendment:

Replace Section 7 with:

“7 Common issues and clarifications

7A Purpose of this section

7.01 This section addresses common issues and misunderstandings that can arise in relation to urban greening. It is intended to support clearer submissions and proportionate decision-making.

7.02 Nothing in this section introduces new policy requirements or standards. It explains how existing policy and the guidance in this TAN may be interpreted and applied in practice.

7B Urban greening should not be residual

7.03 Urban greening should not be treated as an optional add-on or residual element introduced after key design decisions have been made. Where greening is relevant to adopted policy objectives, it should inform site appraisal, layout and design from an early stage.

7C Urban greening and biodiversity net gain are different

7.04 Urban greening and statutory biodiversity net gain serve different functions within the planning system. Urban greening is a design-led, place-based consideration, while statutory biodiversity net gain is governed by legislation, regulations and metric-based assessment.

7.05 Applicants should not assume that delivery of statutory biodiversity net gain, whether on-site or off-site, removes the need to consider urban greening as part of site design. Conversely, urban greening measures do not in themselves demonstrate compliance with statutory biodiversity net gain requirements unless they are specifically designed and secured for that purpose.

7D Roof-based and decorative greening

7.06 Green roofs, brown roofs, green walls and decorative planting can make a valuable contribution to urban greening, particularly in constrained locations. However, such measures should not be relied upon as a substitute for ground-based greening where reasonable ground-based opportunities exist.

7.07 Decorative or tokenistic greening with limited function, poor integration or unclear management is unlikely to be sufficient where urban greening is relevant to adopted policy objectives.

#### 7E Constraints and proportionality

7.08 The councils recognise that site constraints may affect the extent and type of urban greening that can be delivered. Applicants should explain relevant constraints and demonstrate how reasonable opportunities have been explored.

7.09 The assessment of urban greening will remain proportionate to the scale, nature, context and constraints of the proposal and will rely on planning judgement.”

#### Reason:

To convert the common issues section into a concise FAQ-style section and remove duplication with earlier sections.