



**DRAFT**

**DRAFT WORTHING LOCAL PLAN CONSULTATION**

**LAND EAST OF TITNORE LANE**

**Comments on Revised Framework Plan  
(submitted in response to Reg 18 consultation)**

**by**

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**on behalf of**

**Worthing Borough Council**

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## 1. INTRODUCTION

1.1 In June 2018, HDA reviewed the draft Framework Plan (A098052-1\_002) submitted by WYG in respect of development on land east of Titnore Lane.

1.2 The promoters of the site have submitted a consultation response which sets out a revised strategy for developing the site, responding to the comments and concerns raised in the HDA assessment of the draft Framework Plan. Worthing Borough Council has instructed HDA to comment on the revised Framework proposals (A111471\_LA\_002 rev B) in respect of landscape and ecology considerations

1.3 The main constraints and wider context to the site are that the site abuts the South Downs National Park to the west and north. It is surrounded on three sides by ancient woodland and is divided into northern and southern portions by a wide tree belt, which runs broadly east - west through the centre of the site. The woodland within and surrounding the site, forms part of the Titnore and Goring Woods Complex Local Wildlife Site (LWS). The Sussex Wildlife Trust have made further representations in respect of the conservation of the LWS and Ancient Woodland within and adjacent to the site.

## 2. FRAMEWORK PLAN

2.1 The Development Framework Plan submitted to Worthing Borough Council in 2017 had a number of shortcomings in relation to the identified site constraints and the site's wider relationship with the National Park, Ancient Woodland and LWS. The following assessment identifies the original landscape concerns and comments on the revised Framework Plan proposals and the extent to which they have adequately addressed the landscape and ecology issues identified.

## 3. FRAMEWORK PLAN COMMENTS

3.1 The 2017 plan indicated housing abutting the western site boundary along Titnore Lane, which forms the boundary to the South Downs National Park to the west. Whilst intervisibility between the site and the National Park is relatively limited, the roadside hedgerow and trees limit visual impact on the immediate setting to the National Park. Additional structure planting and open space were recommended to reinforce existing boundary vegetation and replace vegetation likely to be lost in establishing forward visibility splays for new access. Open space was also recommended in that it would assist in providing a transition between built form and the National Park boundary.

- 3.2 The revised Framework Plan retains the existing dwelling and northern roadside frontage vegetation. This revision should maintain the existing landscape character of the northern section of the road corridor and setting to the adjacent areas of the National Park. The Plan also includes a set back from Titnore Lane to development together with proposed strategic woodland planting and open space. Such an arrangement, assuming that the forward visibility requirements of the new access do not remove substantial sections of the roadside hedgerow and trees, should provide an adequate buffer to the adjacent National Park.
- 3.3 The 2017 proposals included 126 houses which would have resulted in the loss of the north-eastern internal hedgerow and associated trees and incursions into the buffer zones for Ancient Woodland. As indicated on the revised Framework Plan, the number of houses has been reduced to 73 and a 20m buffer zone to the Ancient Woodland has been provided. In addition, the orientation of properties avoids gardens backing onto the woodland buffer zones. Subject to the protection of the buffer zone from development, including any road construction, the relationship between the revised development and the Ancient Woodland is adequate and the native vegetation proposed should provide an enhancement to the biodiversity of the site.
- 3.4 The provision of a 5m standoff to existing landscape features is sufficient for the north-east hedgerow, however the standoff to mature trees within the hedgerow and to the central woodland belt should reflect the Root Protection Area of individual trees. For the central woodland belt this is more likely to be of the order of 10m. Shading from the central woodland belt should also be considered in the detailed layout of northern housing parcel when considering the standoff from the woodland boundary.
- 3.5 The provision of open space should meet the Borough standard as set out in policy (CP8). The informal open space, as currently proposed, would provide useable areas of open space linked by the linear buffer zones associated with the woodland blocks. Informal grass paths should link these spaces where they run through the Ancient Woodland buffer zones.
- 3.6 Areas of nature conservation value were confined to the perimeter of the development on the 2017 Framework Plan. The revised scheme does include for links across the site, north to south, and the hedge within the north-eastern part of the site has been retained with the central woodland extended eastwards to better connect with the woodland and stream along the eastern site boundary. The habitat connectivity between the areas of woodland and the streamside would be improved.

3.7 No additional information has been submitted in relation to lighting. Careful consideration should be given to the effects of lighting within the development would have on the National Park, Ancient Woodland and LWS.

#### **4 SUSSEX WILDLIFE TRUST COMMENTS**

4.1 The Sussex Wildlife Trust has raised concerns with regard to the internal road connection through the central woodland belt and potential for predation of wildlife within the adjacent Ancient Woodland

4.2 The internal connector road, as proposed, has been located through an existing gap in the central area of woodland to avoid loss of trees. The pylons that currently run through this gap will be rerouted beneath the road. Although this would not result in significant loss of ecological connectivity given the presence of the A2700 to the west and discontinuation of the woodland to the east, the width of the road should be minimised to that required for public safety. Additionally, any lighting should minimise light spill into the 'gap' and the woodland edges.

4.3 Whilst the existing gap in through the woodland is of limited length, any loss of 'ride' habitat should be offset through enhancement of retained woodland edges (e.g. through creation of ecotones) or creation of comparable habitats such as those indicated by the mosaic of woodland, scrub and grassland proposed to the east in an area currently occupied by apparently species-poor semi-improved grassland.

4.4 It is also recommended that the residents of the new development at Titnore Lane are made aware of the ecological interest of the new and retained habitats both within the site and its surrounds. This could include through provision of interpretative signage and provision of 'Living with Wildlife' leaflets in the sales pack for each property, detailing measures for responsible enjoyment and stewardship such as keeping cats indoors between dusk and dawn, and how gardens can complement these habitats such as wildlife friendly planting, provision of hedgehog/bee houses, compost heaps and bird and bat boxes."

#### **5 CONCLUSION**

5.1 In conclusion, the development as set out in the revised Framework Plan is unlikely to compromise the integrity of the Ancient Woodland. Subject to the effects of shading and the RPA's of individual trees being properly considered, the development of the site would not adversely affect the internal hedgerow and woodland structure of the site. The loss of vegetation required for the visibility splays for the new site access may reduce the screening effect of the roadside hedgerow, particularly if the speed limit is not reduced to

40mph. New planting to the western boundary, as proposed, should address this issue. Subject to the provision of adequate strategic woodland planting the landscape and visual effects on the adjacent areas of the National Park should not be significant. The additional Green Infrastructure should provide adequate mitigation to offset the potential loss of glade habitat through the central woodland. In considering the overall effects of the revised Framework Plan on the landscape and ecological resource the revised plan provides an acceptable basis for the future development of the site.