



**Sussex**  
Wildlife Trust

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**By email only**

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AWDM/1264/20 | Mixed use development comprising up to 475 dwellings along with associated access, internal roads and footpaths, car parking, public open space, landscaping, local centre (uses including A1, A2, A3, A4, A5, D1, D2, as proposed to be amended to use classes E, F and Sui Generis) with associated car parking, car parking for the adjacent railway station, undergrounding of overhead HV cables and other supporting infrastructure and utilities (Outline with all matters reserved) | Land North West Of Goring Railway Station Goring Street Worthing West Sussex

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The Sussex Wildlife Trust (SWT) has been informed of the above application and wish to submit the following comments.

SWT recognises the importance of a plan led system as opposed to a developer led process. SWT regularly comments on Local Plans, to ensure that a sustainable and resilient Local Plan for people and wildlife is progressed. This is a process we have taken with Worthing Borough Council (WBC), commenting most recently on the Regulation 18 consultation of the emerging Local Plan.

Through the Regulation 18 consultation it is clear the proposed site of this application will not be allocated for development, but designated as a Green Gap as set out in emerging Policy SP5. This is a policy that SWT are supportive of. SWT encourages WBC to not only look at these sites in terms of providing green gaps but to be clear on the functions those green gaps are currently delivering for the Borough in terms of Natural Capital. The National Planning Policy Framework is clear about this requirement in sections 170 & 174 of the document.

We note that applicant has submitted a Biodiversity Net Gain Assessment that seeks to deliver Biodiversity Net Gain on site. We are pleased that applicant has taken these step but we remain cautious about the actual outcomes given the outline nature of the application and the lack of detail in the current application that identifies long term sustainability.

SWT recognise the WBC Local Plan is emerging. SWT also note the comments made by the applicant in the planning statement in sections 5.73-5.80 that seek to diminish the relevance of these council led aspirations to designate this site as a Green Gap. However the Sussex Wildlife Trust remains clear in its support for this site progressing through the Local Plan process as a Green Gap.

Yours sincerely,

Laura Brook  
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