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15 September 2020

Please ask for:
Michael Eastham
Planning Department
Direct Line: 01903 737772

Mr G Peck
Planning Services Manager
Adur & Worthing Councils
Worthing Town Hall
Chapel Road
Worthing BN11 1HA

Your Ref: AWDM/1264/20

Dear Mr Peck,

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

Thank you for consulting Arun District Council on the above development. Arun District Council **objects** to the loss of the strategic gap.

Unmet housing need

The Council recognises the significant levels of unmet housing need in Worthing. However, Worthing District Council must assess the negative impact of the proposals against local and national policies not least paragraph 11(d) and paragraph 12 of the National Planning Policy Framework. The proposed development is significant in scale at 475 dwellings and 1,005 square metres of commercial floorspace on land adjacent to Goring Railway Station. The site is outside and immediately adjacent the eastern boundary of Arun District Council. The current boundary between the two districts is formed by the Worthing-Ferring Gap between settlements. The site is also located adjacent to properties within Arun on the east side of Ferring Lane up as far as Ferring Rife. Ferring Rife forms the northern boundary of the application site.

Worthing currently has a shortfall of housing supply (i.e. their Objectively Assessed housing Need or OAN) as signalled in its Regulation 18 Draft Local Plan 2016-2033 consultation in October 2018 which Arun has an outstanding objection to because it has not yet demonstrated whether more could be done to reduce its level of unmet need through the efficient use of land.

The impact on coalescence and the impact on the character of Ferring

Worthing District Council needs to ensure that the proposed mixed-use development on this site does not compromise the visual integrity and openness of the strategic gap between

Worthing and Ferring. At present, there is an uninterrupted view from the coastal path looking north towards the South Downs and Highdown Hill. The proposed development conflicts significantly with the purposes of the Strategic Gap, especially in terms of avoiding the coalescence of settlements and compromising the visual openness between Ferring and Worthing, and would bring residential development closer to the South Downs National Park at this point, adjacent to the A259.

Re-location of Worthing Rugby Club

Arun District Council is aware of proposals for the re-location of Worthing Rugby Club from its existing site on Roundstone Lane, in Angmering

The site of the current planning application (Ref. AWDM/1264/20) at Goring Gap is located in very close proximity to Goring railway station; and it is considered offers a suitable site for the re-location of Worthing Rugby Club. Arun District Council considers that the re-location of Worthing Rugby Club would be better located within Goring Gap than in the undeveloped coastal location at Ferring Gap. A balance will need to be made by the applicant and Worthing District Council between developing housing on all of the land within Goring Gap or to re-locate the Worthing Rugby Club on part of their landholdings within the Gap.

Carbon reduction measures

If planning permission is granted for this mixed-use development, then exceptional sustainability / carbon reduction measures should be secured including the provision of green roofs, the use of photovoltaic (PV) panels, air source heat pumps and ground source heat pumps; together with the installation of electric vehicle charging points in order to deliver sustainable housing. Green roofs should also be considered for the commercial uses.

Connectivity

In the event that the application is positively determined, the development would need to ensure that the connectivity to communities and infrastructure (including Green Infrastructure networks) within Arun as well as Worthing is retained and enhanced and must not prejudice access to land to the west (in Arun) i.e. Land East of Green Park (HELAA site reference 110).

A259 Improvements

If planning permission is granted, the development should contribute towards appropriate A259 improvements including any necessary within Arun.

Please do not hesitate to contact the above officer if you require any further assistance.

Yours sincerely,



Neil Crowther
Group Head of Planning
Arun District Council