



# THE WORTHING SOCIETY

President: Anthony Malone

Reply to: Susan Belton  
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16 September 2020

Mr Gary Peck  
Planning Services Manager  
Worthing Borough Council  
Portland House  
Richmond Road  
Worthing  
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Dear Mr Peck

**OBJECTION TO PLANNING APPLICATION AWD/1264/20 :  
LAND NORTH WEST OF GORING RAILWAY STATION, GORING STREET, WORTHING BN12**

I am writing on behalf of The Worthing Society to register our strong objection to the above mentioned planning application. We are a heritage and conservation society established for thirty eight years. An important part of our Constitution is to examine the suitability and quality of planning applications. In this case the applicant is seeking to develop a housing estate of 475 dwellings on important open green space at Goring Gap. This area known as Chatsmore Farm provides a natural strategic gap between Worthing and Ferring.

We consider that, if approved, this development would be detrimental to the amenity of local residents and the wider community as a whole. The sizeable development would severely compromise the open green area, the setting of the South Downs National Park and proximate heritage assets. Furthermore the additional traffic generated by the development would cause unacceptable congestion in the local and surrounding areas both now and progressively in the longer term.

The history of this locally important area and detailed reasons for our objection which illustrate the potentially damaging nature of this outline proposal are stated as follows:

**THE DRAFT LOCAL PLAN AND THE APPLICATION FOR LOCAL GREEN SPACE DESIGNATION**

Persimmon has submitted their plans prior to the approval of Worthing's Draft Local Plan by the Inspector. The Society considers that the application gives insufficient weight to the following important aspects:

- The site is not an allocated development site within the Worthing Borough Core Strategy of 2011 and Worthing's Draft Local Plan which is awaiting examination and approval by the Inspector in 2021.

- An application to designate Chatsmore Farm as Local Green Space and Open Green Space has been submitted and is well supported by the Council together with the local community. There have already been two consultations in 2015 and 2016 where the retention of Chatsmore Farm as Open Green Space has been a central element to the vision of the plan.
- The development proposals by Persimmon therefore seem to be premature and to pre-empt the assessment and judgement by the Inspector. Persimmon apparently takes the view that, because approval has yet to be obtained regarding Local Green Space designation, there is no barrier to submitting this outline application to develop this very sensitive site. Technically this may be so but Persimmon pays insufficient regard to, and seems to override the fact that the Local Authority considers this area fulfils the relevant criteria and fully supports the application for designation.
- Persimmon would do well to appreciate that 'The Draft Local Plan' is the result of an extensive, detailed Public Consultation process which reflects the priorities, concerns and aspirations of the local community for the next thirty years. The application for the Green Space Designation has consistently been a core part of the plan throughout the consultations.
- The concept and recommendations of the Draft Local Plan could be seriously compromised by a new outline development being approved prior to the examination by the Inspector. The community attaches great importance to the retention of this open space and its value to the environment.
- Even though the Draft Plan is awaiting consideration by the Inspector this is still a relevant document of some weight which merits significant and respectful consideration. The pivotal role of the Local Plan in the planning process is underscored by the National Planning Policy Framework (NPPF).
- Planning history: the land at Goring Gap has been threatened with housing development since the 1930s. After the introduction of stronger planning controls in the Town & Country Planning Act the protection of the Gap has been followed through in all development plans, including the County Structure Plans and Worthing and Arun Local Plans.
- It is very significant that the recently adopted Arun Plan carries this on and includes that part of the northern Gap in Arun District as a 'protected gap' between settlements. This decision is very relevant to Persimmon's application and must be on the assumption that there will be a similar policy adopted in the Worthing Borough Plan to protect Chatsmore Farm from development.
- There is no justification for removing this protection. With the increasing pressure to meet housing requirements it is more important now to ensure that Worthing and Ferring do not merge together.
- Although there is a predisposition towards development this is a sensitive site involving the South Downs National Park and the Highdown Conservation Area. It therefore merits special consideration. We consider Persimmon has again given insufficient weight to the protection afforded by the NPPF 2019 in safeguarding both the associated heritage assets and the natural environment.

## **ADVERSE EFFECT ON THE SETTING OF THE SOUTH DOWNS NATIONAL PARK**

The designation of the proximate South Downs National Park (SDNP) is an important factor in recent years which increases the importance of maintaining a policy of preventing development in the Ferring/Worthing Gap in order to protect the natural beauty of the landscape of the National Park and its setting.

The proposed development would be on the land south of the Ferring Rife, but it would still have a much greater visual impact from the north, along Littlehampton Road and from the National Park, than the existing development along Goring Way. This would be emphasised by the height and mass of some of the buildings in the proposed new development which we understand will be up to four storeys in height. Landscaping would not be able to successfully screen it from view and it would be apparent that the development had encroached nearer to the road. This would result in an adverse effect on this nationally important heritage asset which makes such a positive contribution to the local historic environment.

## **HARM CAUSED TO THE HIGHDOWN CONSERVATION AREA**

Another important consideration is the recent designation in May 2020 of the Highdown Conservation Area which is within the South Downs National Park and directly north of the proposed site.

One of the Highdown Conservation Area's three main elements as referred to in para 4.4 of the Conservation Area Appraisal Document (CAAD) is the 'Lodge and Access Road'.

The analysis in the document makes reference to the two Victorian lodges built circa 1850 located at the southern end of Highdown Rise. These buildings are included on the Local Interest List and border the Littlehampton Road. Please note the map below, for reference, which shows the location of the Conservation Area's close proximity to Chatsmore Farm.



Figure 1: Boundary of the Conservation Area (in red).

A significant feature of this element of the conservation area, which is referred to in the CAAD, is the view looking down from Highdown Rise to the presently undeveloped countryside of Chatsmore Farm with the sea beyond. This view is considered to make an important contribution to the setting of both the National Park and the conservation area. I have included here a picture of this view taken for the 'Highdown Conservation Area Character Analysis Section' and reproduced with the consent of the SDNP Historic Adviser:



**View looking south from Highdown Rise**

The proposed development would irrevocably harm this view and it could not be screened from higher viewpoints either within the Conservation Area or elsewhere along the ridge of the Downs. This would therefore be contrary to the Planning (Listed Buildings and Conservation Areas) Act 1990 - Section 72 sets out a statutory duty to protect the character and appearance of a conservation area. In our opinion the proposed plans would not therefore be commensurate with this planning legislation.

We also consider that the applicant has given insufficient regard to the National Planning Policy Framework (NPPF) (Sections 15 and 16) which states the importance of 'Conserving and Enhancing the Natural Historic and Built Environment'.

One of the most important elements of the Highdown Conservation Area is the nationally recognised Grade II\* Listed Chalk Gardens. The associated views are not just confined to the gardens but extend to the environs as a whole and the landscape to the south. A heritage lottery grant has recently been awarded to upgrade the gardens to enhance the visitor experience for residents and tourists alike. It is important therefore that the views and setting of the gardens are protected. Visitor numbers and the significance of the gardens are very likely to increase in the future.

## **LIGHT POLLUTION**

The light pollution generated by the new development would have an unacceptable effect on the wildlife in the area as well as the setting of the National Park and the surrounding heritage assets.

To the east of the lodges on the access road, and just outside the SDNP, is a distinctive Grade II Listed flint and brick barn, very much in character with the area. The setting of this building and how it contributes to the location will also be adversely affected by the development and resultant light pollution.

## **WORTHING'S CLIMATE EMERGENCY**

Another relevant factor is that Worthing Borough Council has recently declared a climate emergency. It is therefore desirable to give priority to protecting the environment by preventing the gradual erosion of our local green areas. Chatsmore Farm provides a natural open 'gap' between Ferring and Worthing. These areas are vital to the health and wellbeing of the community, which is supported by the NPPF - para 97 "Wherever possible brown field sites should be prioritised for development".

In addition, this landscape is presently farmed as Grade I agricultural land and forms a 'green lung' between Worthing and Ferring. This important natural resource would be lost if the development went ahead. The development would result in the loss of over half the gap creating an inevitable adverse effect on the wildlife, trees and the local natural environment. Residents are extremely concerned about the impact of the development on these issues and there is significant opposition to this proposal. This was reflected in the response to the Public Consultation of 2018

## **DRAINAGE**

An important characteristic of the proposal site is the Ferring Rife which is known to have flooded and to be affected by the tides. Critical, serious rainfall events and seriously high tides are becoming ever more frequent with what appears to be the rapid onset of climatic change. The nearby West Durrington development has already been affected by drainage issues which illustrate the apparent vulnerability of this area.

We are concerned therefore that the mitigation measures submitted by Persimmon may require closer government scrutiny combined with a wider overall assessment of the surrounding area. At best, regular monitoring and maintenance of these flood prevention measures would be required. This would be unsettling and worrying for the residents. In our view these concerns demonstrate that the intrinsic quality and nature of the land does not lend itself to this scale of residential development.

## **INFRASTRUCTURE AND EFFECT ON HIGHWAY NETWORK**

The new development of 475 households would inevitably result in unacceptable, additional pressures on local amenities for GP's surgeries, availability of appointments, pharmacies, school places and dentists. There is already a considerable national shortage of these professionals.

The strain on the local community resources would be compounded by the fact that the new development would severely impact on the highway network and associated A259 which is already under severe pressure.

- An additional 475 households, potentially owning two cars each, could potentially generate an increase of 900 cars accessing the area's transport layout.

- The neighbouring West Durrington developments, which are already approved, will also exacerbate the delays, queues and strain on the existing highway network. In our view, the proposals submitted by Persimmon appear to be incomplete and do not overcome these vitally important issues.
- We note that WSCC have objected to the application which is significant.
- Attached, as Appendix I, is a detailed analysis of the applicants transport forecast prepared by a former member of the Department of Transport and a Worthing Society Committee member. This document clearly illustrates our significant concerns regarding the effect on the highway network.

## **CONCLUSION**

We consider that, for the reasons stated, this application which involves an exceptional and sensitive area should be refused. The application submitted by Persimmon is, in our view, defective in all respects and will result in a serious loss of amenity to the community. Persimmon has, we consider, failed to give sufficient regard to the adverse effect of the proposal on the proximate heritage assets and the environmental issues. The potentially severe impact on the infrastructure and highway network of the surrounding area is so serious that the application should be withdrawn immediately. Persimmon would do well to consider their reputation and to respect the long standing community desire to retain this land as open green space which is supported in Worthing's Draft Local Plan.

Issues of climate change are also becoming ever more pertinent. It is interesting to note that an area of green space known as New Salts Farm in Shoreham and which was previously the subject of an unsuitable development plan, has now been purchased by Adur Council to preserve the natural habitat. This, perhaps, indicates a trend towards the importance of retaining our open green land to protect the environment for this and future generations.



**WORTHING SOCIETY CHAIRMAN**

# **APPENDIX 1**

**Planning Application AWDM 1264/20**

**Transport Assessment**



**PLANNING APPLICATION AWDM 1264/2**  
**LAND WEST OF GORING RAILWAY STATION, GORING STREET,**  
**WORTHING (CHATSMORE FARM)**

**TRANSPORT ASSESSMENT**

Permission for this development should be refused, because traffic on the A259 near the development would be reduced to a standstill if it was built, even if the roundabouts at Goring Crossways and Goring Way were improved as the developer proposes. According to the applicant's forecasts, average queues at these two roundabouts at peak hours would be between 200 and 270 vehicles in 2033. There would be considerable fluctuations around these numbers, because traffic is never constant. The two roundabouts are about 700 metres apart, with 230 metres of dual carriageway. There is therefore about 930 metres of carriageway between the two roundabouts to accommodate queuing vehicles. A queue of 200 vehicles would be at least 1,000 metres long. Goring Street between Goring Crossways and Goring Way would therefore be wholly occupied by these queues from the two roundabouts.

The queue north from Goring Way in the morning peak of 200 vehicles would extend past Goring Crossways roundabout and obstruct the operation of the roundabout. The queue south from Goring Crossways, of 260 vehicles in the morning peak and 235 vehicles in the afternoon peak, would stretch beyond the Goring Way roundabout, which would also be blocked. The evaluation of the operation of these junctions provided by the applicant assumes that they will operate freely, and are therefore unrealistically optimistic.

A consequence of these queues is that the proposed roundabout at the entrance to the development, placed 230 metres south of Goring Crossways and 430 metres north of Goring Way, would be blocked in the morning and evening peak hours, obstructing attempts to leave or enter the development.

The evidence supplied by the applicant therefore shows that by 2033 it would be difficult for vehicles to enter or leave Worthing along the A259 at Goring, and equally difficult for vehicles to enter or leave the development. Residents on the development would be virtually prisoners during peak hours.

This application is therefore wholly unrealistic. It should never have been submitted. Persimmon is a major developer, which is expected to produce technically valid applications. In this case, it has failed to meet this basic requirement.



The table below summarises the forecasts of traffic queues at Goring Crossways and Goring Way roundabouts in 2033, with the Chatsmore Farm development.

**Queues at roundabouts in 2033 with Chatsmore Farm development and mitigation measures proposed by the applicant.**

	<b>AM Peak Hour</b>	<b>PM Peak Hour</b>
	With development	With development
A259 - Littlehampton Road	272	146
A259 - Goring Street	260	235
A259 - Goring Way North	201	90
A259 - Goring Way East	88	129

This application should be refused, on the grounds that it shows that the proposed development could not be accommodated within even an improved road network. Persimmon should consider withdrawing the application to avoid further needless concern about its consequences.

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