



**National  
Trust**

My Ref: AB/S.Down/Highdown  
5 October 2020

Mr Gary Peck  
Worthing Borough Council  
Worthing Town Hall  
Chapel Road  
WORTHING  
West Sussex  
BN11 1HA

Dear Mr Peck

**National Trust Response to Mixed Use Development at Land North West of Goring  
Railway Station, Goring Street, Worthing (Ref: AWDM/1264/20)**

The National Trust has been contacted regarding the proposed development at Land North West of Goring Railway Station and has taken the opportunity to review the submitted information.

The National Trust owns and manages 21 hectares of Highdown Hill, which lies to the north west of the application site. The land is of great archaeological importance and this is recognised with the designation of the Scheduled Monument (SM) within part of the land within the Trust's ownership. The land directly links to a wider area of recreational importance for local residents and provides long distance views across the coastal plain. The site forms the southern edge of the South Downs National Park.

As indicated above the site is of national importance for archaeology. The SM is identified as dating from the Bronze Age period (2000-700BC) with an extremely rare Ram's Hill enclosure with Historic England indicating that only 10 of these types of enclosure have been positively identified from this period. In addition, the SM has an Anglo-Saxon cemetery within the Bronze Age ramparts and this has yielded a significant amount of archaeological finds. The site has also had Roman finds which suggests use by them in the First Century AD. The site also has potential archaeological interest outside the SM area with evidence of occupation during medieval times and the southern boundary of the site has a 4.5m raised beach. The Trust therefore considers that the site should be considered as a heritage asset of national significance.

The Trust is disappointed that this proposal has come forward outside the Development Plan process and consequently its suitability for development has not been assessed alongside

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other sites to ensure that sustainable development is achieved within the Borough. The Trust fully supports the plan-led system as it is considered the most appropriate way of securing development in compliance with the NPPF objectives and it seems that the emerging Draft Worthing Local Plan this area was not considered suitable for development and that its value as open space and a gap between settlements was to be protected. However, the Trust recognises that these policies had not been tested through examination and that it is highly likely that the LPA will have to consider paragraph 11 of the NPPF in its decision making process.

Having reviewed the submitted information the Trust would like to make some more detailed comments on the proposal. As indicated above Highdown Hill and its archaeological significance are protected by two national designations (Schedule Monument status and its position within the South Downs National Park). The coastal plain to the south of Highdown Hill has played an integral part of the significance of the site for over 4,000 years and while the Trust accepts that the setting of the SM has changed to now being impacted by the development of the settlements between Worthing and Littlehampton this increases the value of the remaining open and undeveloped land. The Trust's view is that this proposal will further diminish the setting of Highdown Hill with the introduction of built form and associated infrastructure and while this may be less than substantial harm under the terms of the NPPF we are concerned about the continual erosion of the setting of this nationally significant feature.

In addition, the southern boundary of the South Downs National Park (SDNP) lies just to the north of the application site and therefore falls within the setting of the National Park. Highdown Hill is one of the selected viewshed monitoring points within the SDNP. The proposed development will impact on the setting of the SDNP and its special qualities and case law has determined that such matters are material considerations in the determination of applications. The Trust therefore hopes that Worthing Borough Council will consult carefully with the South Downs National Park Authority to consider the impact that this proposal will have on the SDNP and whether that impact can be considered to comply with the duties under the Environment Act 1995 and with the requirements of paragraph 172 of the NPPF.

The Trust hopes that these comments can be taken into consideration during the course of the application and should any additional information or clarification be required please do not hesitate to contact me.

Yours sincerely

A solid black rectangular box used to redact the signature of Anna Budge.

Anna Budge MRTPI  
Planning Adviser

Cont/d