

Planning Appeal – Goring by Sea – Core Documents List

Date: 01.02.2024

APP/M3835/W/21/3281813–
Land West of Goring Station, Goring-by-Sea, Worthing

A – Planning Application

Documents

A1	Application Forms, dated 7th August 2020
A2	Covering Letter, prepared by Pegasus Group, dated 7th August 2020
A3	Planning Statement, prepared by Pegasus Group, dated August 2020
A4	Design and Access Statement, prepared by Thrive Architects, dated August 2020
A5	Statement of Community Engagement, prepared by Pegasus Group, dated August 2020
A6	Breeding Bird Survey, prepared by Urban Edge Environmental Consulting, dated August 2020
A7	Winter Bird Survey Report, prepared by TSA Ecology, dated July 2020
A8	Biodiversity Net Gain Assessment, prepared by Urban Edge Environmental Consulting, dated July 2020
A9	Protected Species Survey, prepared by Urban Edge Environmental Consulting, dated July 2020
A10	Built Heritage Statement, prepared by Pegasus Group, dated August 2020
A11	Landscape and Visual Impact Assessment (CSA Environmental, July 2020)
A12	Transport Assessment (Milestone Transport Planning, August 2020)
A13	Residential Travel Plan (Milestone Transport Planning, August 2020)
A14	Environmental Noise Impact Assessment (Sound Advice Acoustics Ltd, July 2020)
A15	Archaeological Desk-Based Assessment (CgMs Heritage, October 2018, revised August 2020)
A16	Flood Risk Assessment and Drainage Strategy (RGP Design, July 2020)

A17	Hydraulic Model Report (Ambiental Environmental Assessment, April 2020)
A18	Hydraulic Modelling Letter (Ambiental Environmental Assessment, April 2020)
A19	Arboricultural Opportunities and Constraints Assessment (Barrell Tree Consultancy, August 2020)
A20	Tree Constraints Plan (Barrell Tree Consultancy, August 2020)
Drawings	
A21	Site Location Plan SLP-02 (Rev P5)
A22	Concept Masterplan CMP-02 (Rev P6)
Committee Report/Documents	
A23	Committee Report dated 10th March 2021
Decision Notice	
A24	Decision Notice dated 11th March 2021
Updated Committee Report	
A25	Committee Report dated 23rd August 2023

B – Consultation Responses (Consultee)		
Application Consultation Responses		
B1	A	West Sussex Fire and Rescue, 18th August 2020
	B	West Sussex Fire and Rescue, 21st August 2020
B2		Technical Services (Drainage), 21st August 2020
B3		Sussex Police, 24th August 2020
B4		Sussex Ornithological Society, 27th August 2020
B5		Lead Local Flood Authority, 7th September 2020
B6	A	Southern Water, 7th September 2020
	B	Southern Water, 7th September 2020
	C	Southern Water, 7th September 2020
B7		Sussex Wildlife Trust, 8th September 2020
B8		Environment Agency, 8th September 2020
B9		West Sussex County Council Highways, 10th September 2020
B10	A	Environmental Health, 15th September 2020
	B	Environmental Health, 16th September 2020
B11		Arun District Council, 15th September 2020

B12	A	Worthing Society, 15th September 2020
	B	Worthing Society, 16th September 2020 -
B13		Parks and Foreshore, 17th September 2020
B14		Network Rail, 2nd October 2020
B15		National Trust, 5th October 2020
B16	A	CPRE Sussex, 11th October 2020
	B	CPRE Sussex, 11th October 2020
B17		South Downs National Park Authority, 21st October 2020
B18		Landscape – 17th November 2020
B19	A	Highways England – 12th January 2021
	B	Highways England – 10th March 2021
	C	Highways England – 10th March 2021
	D	National Highways– 16 th December 2021
B20		South Downs National Park Authority dated 19th January 2024
B21		Correspondence between Council and SDNPA October 2023

C – Original Planning Appeal

Appeal Administration

C1 Planning Appeal Form, dated 27th August 2021

Statements of Case

C2 Appellant

C3 LPA

Statement of Common Ground

C4 Planning Statement of Common Ground

Proofs of Evidence

C5	A1	Appellant Planning Proof
	A2	Appendices
	A3	Summary
	B1	Appellant Landscape Proof
	B2	Appendices
	B3	Statement of Common Ground
	C1	Appellant Heritage Proof
	C2	Summary
	C3	Statement of Common Ground
	D1	Appellant Highways Proof
	D2	Appendices
	D3	Statement of Common Ground
	E1	Appellant Housing Need Proof
	E2	Statement of Common Ground
C6	F1	Appellant Affording Housing Proof
	F2	Appendices
C6	A	LPA Planning Proof
	B	LPA Landscape Proof (and Appendices)

	C	LPA Highways Proof (and Appendices)
	D	LPA Policy Proof
Conditions		
C7		Draft List of Conditions – within LPA Planning Proof

D - National Planning Policy, Guidance and Legislation		
D1		National Planning Policy Framework (July 2021)
D2		National Planning Practice Guide
D3		DLHUC Live Tables on housing supply
D4		DfE Securing Developer Contributions for Education (November 2019)
D5		Housing Delivery Test Measurement Rule Book (MHCLG, July 2018)
D6		Consultation document on proposed changes to the NPPF
D7		National Planning Policy Framework (December 2023)
D8		Housing Delivery Test 2022

E – Local Planning Policy, Guidance and Documents		
E1		Worthing Core Strategy (April 2011) and Proposals Map
E2		Emerging Worthing Local Plan (Submission version, January 2021)
E3		Worthing Borough Council Annual Monitoring Report 2019-20
E4		Worthing Borough Council Guide to Residential Development SPD (2013)
E5		Worthing Borough Council Developer Contribution SPD July 2015
E6		Post hearing advice letter from Inspector re the Examination of the emerging Worthing Local Plan (9th December 2021)
E7		Affordable Housing Interim Position Statement (August 2019)
E8		Saved policies of the Worthing Local Plan (2003)
E9		Adur and Worthing Community Homelessness Prevention Strategy 2017 to 2022
E10		Adur and Worthing Housing Strategy 2020-2023 (and summary)
E11		Coastal West Sussex Strategic Housing Market Assessment (2009)

E12	Strategic Housing Market Assessment – Adur District Council and Worthing Borough Council (2020)
E13	Topic Paper Housing Implementation Strategy (June 2021)
E14	Worthing Local Plan 2020-2036 – Response to IL01 – Initial Letter from the Inspector (August 2021, ref WBC-E-02)
E15	Planning School Places 2021 (West Sussex County Council)
E16	Worthing Local Plan Inspector's Examination Guidance Note 20/9/21
E17	Topic Paper Land outside the Built Up Area Boundary (May 2021)
E18	Worthing Local Plan Note on overlap and inter-relationship between Policies SS4, SS5 and SS6 (November 2021, ref. WBC-E-17)
E19	Worthing Local Plan Examination – Inspector's Initial Matters, Issues and Questions to the Council Version 1 (20/9/21)
E20	Worthing Local Plan – Response to IL06 (November 2021, ref. WBC-E-14)
E21	Worthing Local Plan – Extending the time period of the Plan from Adoption – Note (November 2021, ref. WBC-E-16)
E22	Worthing Local Plan – Matter 3-Housing Provision (October 2021, ref. WBC-E-05)
E23	Worthing Borough Council's trajectory for the emerging allocations
E24	Worthing Employment Land Review Focused Update (Final Report, September 2020)
E25	Worthing Local Plan – Inspector's Initial Letter IL01
E26	Housing Need (SHMA) Evidence Base Worthing Submission Local Plan
E27	Housing Capacity (SHLAA) Evidence Base (and appendices) Worthing Submission Local Plan
E28	Worthing Local Plan Issues and Options Consultation Report (2016)
E29	Draft Worthing Local Plan Consultation 2018
E30	Worthing Local Plan Draft Hearing Programme Version 7
E31	Sustainability Appraisal Report (and technical appendices) of draft submission Worthing Local Plan
E32	Worthing Duty to Co-Operate Statement (January 2021) -
E33	Persimmon representations on Regulation 19 Worthing Submission Local Plan
E34	Worthing SHLAA Update
E35	Worthing Sustainability Appraisal Post-Hearing Update
E36	Duty to Co-Operate Addendum (June 2021)

E37	Inspector's Final Report on the Worthing Local Plan
E38	Worthing Local Plan 2020-2036
E39	Worthing Borough Council Annual Monitoring Report 2021-22
E40	Home Builders Federation submission to the Local Plan Inquiry
E41	Worthing Annual Monitoring Report 2022-23 (Yet to be published).
E42	Letter from Examining Inspector re allowed appeal (dated 18th March 2022)
E43	Worthing Local Plan Proposed Main Modifications October 2021

F – Heritage

F1	Conservation Area Appraisal, Designation and Management (Historic England Advice Note 1)
F2	Managing Significance in Decision Taking in the Historic Environment
F3	The Setting of Heritage Assets (Historic Environment Good Practice Advice in Planning Note 3) (Second Edition)
F4	Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment
F5	Statements of Heritage Significance, Analysing Significance in Heritage Assets (Historic England Advice Note 12)
F6	Highdown Conservation Area Appraisal

G – Landscaping

G1	Guidelines for Landscape and Visual Impact Assessment 3rd Edition
G2	An Approach to Landscape Character Assessment, October 2014
G3	National Character Area profile 126: South Coast Plain
G4	SC11 Littlehampton and Worthing Fringes SCA (Extract from Landscape Character Assessment for West Sussex, 2003)
G5	South Downs Integrated Landscape Character Assessment (updated 2011)
G6	South Downs National Park: View Characterisation and Analysis (2015)
G7	Landscape and Ecology Study of Greenfield Sites in Worthing Borough (HDA, 2015)
G8	Landscape and Ecology Study of Greenfield Sites in Worthing Borough - Review of Low Suitability Sites (HDA, 2017)

H - Transport	
H1	West Sussex Transport Plan 2011-2026 (Feb 2011)
H2	West Sussex Walking and Cycling Strategy 2016-2026 (April 2017)
H3	Worthing Local Plan Transport Assessment and Addendum (August 2018/January 2021)

I – Affordable Housing / Housing Need	
I1	Housing White Paper 'Fixing our broken housing market' (February 2017)
I2	Denied the Right to a Safe Home - Exposing the Housing Emergency (Shelter, May 2021)
I3	Start to Finish, Second Edition (Lichfields, February 2020)
I4	Chance of a Lifetime (Shelter, September 2006)
I5	Average Disposable Income by Age of Household (ONS, September 2019)
I6	Article from Sussex Express dated 9 th October 2023
I7	Article from Personnel Today dated 1 st December 2022
I8	House of Commons Debate (October 2013)
I9	Children's Commissioner: Bleak Houses: Tackling the Crisis of Family Homelessness in England (May 2021)
I10	House of Commons: Rising Cost of living in the UK briefing report (November 2022)
I11	Shelter Briefing: Cost of Living Crisis and the Housing Emergency (September 2022)
I12	Bellway Annual Report and Accounts 2022
I13	Adur and Worthing – Delivering Pathways to Affordable Homes

J – Relevant Decisions, Legal Judgements and Officer Reports	
J1	Appeal Ref. APP/R3650/W/19/3230164 – Land at Windacres Farm
J2	Appeal Ref: APP/R3650/W/18/3211033 – Hawthorns
J3	Appeal Ref: APP/C3810/W/19/3236911 – Land Adjacent to Bonhams and Flints
J4	Appeal Ref: APP/A0665/W/14/2212671 – Winsford

J5	Suffolk Coastal District Council (Appellant) v Hopkins Homes Ltd and anor (Respondents) Richborough Estates Partnership LLP and anor (Respondents) v Cheshire East Borough Council (Appellant) [2017] UKSC 37
J6	Palmer v Herefordshire Council & Anor [2016] EWCA Civ 1061
J7	R (DCLG and Nuon UK Ltd) v Bedford Borough Council [2013] EWHC 2847
J8	R (Forge Field Society , Barraud and Rees) v Sevenoaks DC, West Ken Housing Association and Viscount De L'Isle [2014] EWHC 1895
J9	East Northamptonshire District Council v SSCLG [2015] EWCA Civ 137
J10	Jones v Mordue Anor [2015] EWCA Civ 1243
J11	Appeal decision APP/1862/A/65597 – TO BE UPLOADED
J12	Application WB/541/69 – Decision Notice – TO BE UPLOADED
J13	Application WB/665/72 - Decision Notice – TO BE UPLOADED
J14	Appeal Decisions APP/1862/A/72/173 and APP/2065/A/73/2364
J15	Appeal ref. APP/Q3115/W/3230827 – Oxford Brookes University
J16	Appeal ref. Q3630/A/05/1198326 – Land at Franklands Drive, Addlestone
J17	Appeal ref. APP/P4605/W/18/3192918 – North Worcestershire Golf Course
J18	Appeal ref. APP/B3410/W/20/3245077 – Land off Aviation Lane, Burton-upon-Trent
J19	Appeal ref. APP/H1840/A/13/2199426 – Land North of Pulley Lane, Droitwich Spa
J20	Appeal ref. APP/K2420/A/13/2208318 – Sketchley House, Watling Street
J21	Appeal ref. APP/D0840/A/13/2209757 - Land north of Upper Chapel, Launceston
J22	Appeal ref. APP/L3815/W/16/3165228 - Land at the corner of Orving Road and the A27, Chichester
J23	Appeal ref. APP/P0119/W/17/3191477 – Land east of Park Lane, South Glos
J24	Appeal at Land at Kings Hill, West Malling
J25	Gallagher Homes Ltd and Lioncourt Homes Ltd vs Solihull Metropolitan Borough Council [2014] EWHC 1283 (admin)
J26	Appeal ref. APP/C1950/W/17/3190821 – Entech House, Woolmer Green
J27	Appeal Ref. APP/W3520/W/18/3194926 - Woopit

J28	Appeal Ref. APP/Z1510/W/18/3207509 – Bures Hamlet
J29	Appeal Ref. APP/A1530/W/18/3207626 – West Bergholt
J30	Appeal Ref. APP/D1265/W/18/3206269 - Charminster
J31	Appeal ref. APP/A1530/W/20/3248038 - Tiptree
J32	Appeal ref. PCU/APP/G1630/W/3184272 – Oakridge, Highnam
J33	Appeal ref. APP/R3650/W/18/3211033 – Hawthorns, Farnham
J34	Appeal ref. APP/P1560/W/20/3256190 – Earls Hall Drive, Clacton-On Sea
J35	Appeal ref. APP/G1630/W/20/3257625 – Coombe Hill
J36	Appeal ref. APP/V2635/W/19/3237042 - Knights Hill Village
J37	Appeal ref. APP/E5330/W/19/3233519 – Land at Love Lane
J38	Appeal ref. APP/G6100/W/19/3233585 – VIP Trading Estate, London
J39	Appeal ref. APP/Y0435/W/17/3169314 – Land East of Newport Road
J40	Appeal ref. APP/D3505/W/18/3214377 – Land off Station Road
J41	Appeal ref. APP/G2625/V/19/3225505 – Anglia Square
J42	Appeal ref. APP/R0660/A/13/2197532 – Audlem Road/Broad Lane, Nantwich
J43	Appeal ref. APP/0665/A/12/2179410 – Grange Farm, Hartford
J44	Appeal ref. APP/A0665/W/19/3220360 – Land at The Hollies, Northwich
J45	Appeal ref. APP/B1930/W/20/3265925 – Colney Heath
J46	Appeal ref. APP/L2820/W/20/3253498 - Desborough
J47	Appeal ref. APP/D3125/W/17/3182718 - Enstone
J48	Appeal ref. APP/F2415/W/16/3151978 - Lutterworth
J49	Committee Report for application AWDM/1882/16 at West Durrington - https://docs.adur-worthing.gov.uk/NorthgatePublicDocs/02108339.pdf
J50	West Oxfordshire District Council v (1) Secretary of State for Housing Communités and Local Government (2) Rosconn Strategic Land Limited [2018] EWHC 3065 (Admin)

J51	Report of the Examination of the West Oxfordshire Local Plan 2031
J52	Appeal ref. APP/H2265/W/20/3256877 – East Malling
J53	Appeal ref. APP/G1630/W/14/3001706 - Cornerways
J54	Barnwell – C1/2013/0843
J55	Catesby Estates – C1/2017/1840
J56	South Lakeland judgement (January 1992)
J57	Nuon UK Ltd – CO/9953/2012
J58	Hallam Land Management vs SOS et al (2018) EWCA Civ 1803
J59	Appeal ref. APP/A1530/W/19/3223010 – 97 (and land adjacent to) Barbrook Lane, Tiptree
J60	Appeal ref. APP/D0121/W/16/3153935 – Farleigh Fields, Backwell
J61	Appeal ref. APP/A1530/W/17/3178656 – Bakers Lane, Colchester
J62	Appeal ref. APP/Y0435/W/17/3169314 – Woburn Sands
J63	Appeal ref. APP/R3650/W/19/3230164 – Rudgwick
J64	Appeal ref. APP/C4235/W/18/3205559 – 160 Stanley Road, Cheadle Hulme
J65	Appeal ref. APP/W4705/V/18/3208020 – Land West of Burley in Wharfedale
J66	Wainhomes judgement (ref. CO/12207/2012)
J67	Hunston Properties Ltd v St Albans CDC and SoS CLG [2013] EWCA Civ 1610
J68	EWCA Civ 320 City & Country Bramshill Limited v SoS, Hart District Council, Historic England and the National Trust [2021].
J69	Case No. CO/1091/2015 De Souza vs SSCLG [2015].
J70	Case No. C1/2015/4315 Gladman v Daventry
J71	Appeal ref. APP/J2210/W/18/3216104 Land off Popes Lane, Sturry
J72	FOI Correspondence
J73	Updated FOI Response
J74	FOT attachment historic affordable housing delivery

J75	Appeal ref. APP/P3040/W/17/3185493
J76	High Court Judgment of R (oao Matthew Davison) vs Elmbridge Borough Council [2019] EWHC 1409 (Admin)
J77	Appeal ref: APP/J1860/W/22/3304685 - Land at North Lodge, Hallow
J78	Appeal ref: APP/J1860/W/22/3313440 - Land At (OS 8579 4905), South of Post Office Lane, Kempsey
J79	Appeal ref: APP/Q3115/W/22/3296061 - Land to the north of Moreton Road, Moreton
J80	Appeal ref: APP.D3125/W/22/3293656 - Land east of Barns Lane, Burford
J81	Appeal ref: APP/R0660/A/13/2197532 & APP/R0660/A/13/2197529 - Land off Audlem Road/Broad Lane, Stapeley and Land off Peter De Stapeleigh Way, Nantwich
J82	Appeal ref: APP/W1145/W/19/3238460 - Land at Caddywell Lane / Burwood Lane, Great Torrington
J83	Appeal ref APP/C3620/W/23/3324631: Sondes Place Farm, Dorking
J84	Appeal ref. APP/Y2736/W/15/3136237/APP/Y2736/W/15/3136233: Land to the West of Langton Road, Norton
J85	Appeal ref. APP/W0340/A/14/2228089: Land at Firlands Farm, Burghfield Common
J86	Appeal ref. APP/W0340/A/14/2226342: Mans Hill, Burghfield Common
J87	Appeal ref. APP/M2270/W/21/3282908: Hawkhurst, Kent
J88	Appeal ref. APP/W3520/W/18/3194926: Land on the East Side of Green Road, Woolpit
J89	R (Bramley Solar Farm Residents Group) v Secretary of State LUHC [2023] EWHC 2842
J90	Monkhill Ltd v SSHCLG [2021] EWCA Civ 74
J91	Bayliss v Secretary of State for Communities and Local Government [2014] EWCA Civ 347
J92	Protect Dunsfold Judgement [2023] EWHC 1854 (Admin)
J93	Appeal ref. APP/C3810/W/22/3295115 Angmering
J94	Appeal ref. APP/C3810/W/22/3309365 Walberton
J95	Telford v SoS [2016] EWHC 3073 (Admin)
J96	Appeal ref. APP/J1860/W/21/3267054: Claphill Lane, Rushwick
J97	Appeal ref. APP/J1860/W/19/3242098: Land South of Bransford Road, Rushwick

J98	Appeal ref. APP/J2210/W/16/3156397: Land at Blean Common, Kent
K – Documents submitted at the original Inquiry	
K1	Appellant’s Opening Statement
K2	Council’s Opening Statement
K3	Planning Statement of Common Ground (also C4)
K4	Statement from Mr Bob Niall (Goring and Ilex Conservation Group)
K5	Statement from Mrs S Belton (Worthing Society)
K6	Revised Appendix H of Appellant’s Landscape Proof of Evidence
K7i – K7iv	Aerial photographs of site and surroundings
K8i-iv	VISSIM model videos (online only)
K9	Draft s106 Agreement
K10	Draft CIL Compliance and Justification Statement
K11	Appeal ref. APP/P3040/W/17/3185493 (also J75)
K12	West Sussex Structure Plan (2005)
K13	SoS Appeal Decision Ref APP/F1610/A/11/2165778
K14	Worthing Council draft Integrated Impact Assessment – Main Report (2018)
K15	Worthing Council draft Integrated Impact Assessment – Appendices
K16	Worthing Local Plan 2020-2036 Sustainability Appraisal Note on Unmet Need
K17	Statement from Mr Grant Ring
K18	South East Plan: Regional Spatial Strategy for South East of England (2009) Section A
K19	South East Plan Regional Spatial Strategy for South East of England (2009) Section B
K20	South East Plan Regional Spatial Strategy for South East of England (2009) Section C
K21	South East Plan Regional Spatial Strategy for South East of England (2009) Section D

K22	Panel Report on the Regional Spatial Strategy for South East of England (2009)
K23	LPA Closing Submissions
K24	Appellant Closing Submissions

L – Post-Inquiry Documents

L1	Appeal decision – Land North West of Goring Station – APP/M3835/W/21/3281813
L2	High Court Judgement ref. CO/1221/2022 dated 1 st August 2022
L3	Court of Appeal Judgement ref. CA-2022-001665 dated 30 June 2023

M – New Planning Appeal Documents

M1	Re-determination letter dated 3 rd August 2023
M2	Re-determination 2 nd letter dated 29 th September 2023
M3	Appellant updated Statement of Case
M4	LPA updated Statement of Case
M5	CMC Summary Note 14 th December 2023
M6	Biodiversity Net Gain Assessment (Urban Edge, December 2023)

N – Miscellaneous

N1	Worthing Joint Strategic Sub Committee Sept 23
N2	Correspondence between landowners and developers

O – New Appeal Proofs, SoCGs etc January 2024

O1	LPA Planning Proof of Evidence A: Appendices 1 and 2 B: Appendix 3 C: Appendix 4 D: Summary
O2	LPA Housing Proof of Evidence

O3	LPA Landscape Proof of Evidence and Appendix B to D A: Appendix A B: Appendix E to K C: Summary
O4	Statements of Common Ground: A: Planning B: Housing C: Landscape D: Biodiversity Net Gain
O5	Appellant Planning Proof of Evidence A: Summary
O6	Appellant Housing Proof of Evidence A: Appendix
O7	Appellant Landscape Proof of Evidence A: Appendix
O8	Appellant Affordable Housing Proof of Evidence A: Appendix
O9	CIL Compliance Statement
O10	Draft Section 106 Agreement
O11	Draft Unilateral Undertaking