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Submission Draft Local Plan – March 2021

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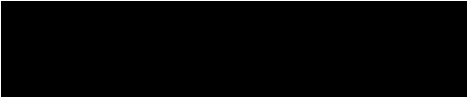
23rd March 2021

Dear Sir/ Madam,

**Re: Regulation 19 (Publication Stage) of the Submission Draft Worthing Local Plan January 2021
Representations submitted by Persimmon Homes: Site Allocation A15 – Upper Brighton Road**

Please find enclosed our representations to the Regulation 19 of the submission draft Worthing Local Plan.

Yours sincerely



Robert Clark
Land and Planning Director
Persimmon Homes Thames Valley

Enc. Worthing Borough Regulation 19 Representation Statement

WORTHING BOROUGH COUNCIL REGULATION 19 LOCAL PLAN

Formal Representations by Persimmon Homes

The submission is in two parts:

- . **The Plan's inadequate response to Housing Need, and**
 - . **Affirmation of Site A15, at Upper Brighton Road**
-

Part 1: The Plan's Inadequate Response to Housing Need

1. Introduction

- 1.1 Generally speaking, Persimmon Homes support the Council's greenfield housing sites through the Regulation 19 Local Plan. More specifically, the allocation at Upper Brighton Road (Site Allocation A15) for 123 units, is welcomed and supported as a *deliverable* housing site.
- 1.2 However, the emerging Local Plan, in Paragraph 3.13, explains there is a requirement for 14,160 homes across the plan period, which equates to 885 dwellings per annum. However, the emerging Local Plan only identifies a requirement of 3,672 dwellings over the plan period – resulting in an unmet need of 10,488 homes by 2036. This is manifestly unsound.
- 1.3 Worthing Borough is operating a deliverable land supply of 1.3 years, obviously that is significantly below the obligatory (minimum) 5-year requirement specified in the National Planning Policy Framework, published in 2019.
- 1.4 It is against this context and severe housing deficit that the Council's Site Allocation A15 for the land at Upper Brighton Road is, of course, fully supported. The site is deliverable, available for development and capable of implementation within the next 12 months. In this regard, Site Allocation A15 is welcomed and the case is buttressed in Part 2 of this submission.
- 1.5 Having reviewed the Council's housing numbers deficit, we turn to the Council's Affordable Housing Policy.

2. Affordable Housing Policy (DM3 Affordable Housing)

- 2.1 The Council fully acknowledge that only 25.6% of their overall housing need will be met and this will result in a housing shortfall over the Plan period of approximately 10,488 dwellings. The, patently, dire housing land supply position in the Borough cannot justify wholesale dismissal of large tracts of land – especially in relation to paragraph 5.45 of the Plan... "In

response to (the need for 490 dwellings per annum) the Council is committed to taking all opportunities to deliver high quality affordable housing..."

- 2.2 The first part of this Statement makes it clear that the Plan is failing to respond to local housing needs and that will result in no more than a fraction of its affordable housing obligations being met. And there is an allied problem – the Plan places undue reliance on the allocated greenfield sites to respond to the on-going affordable housing shortfall.
- 2.3 It is against this context that Persimmon Homes object to policy DM3 Affordable Housing. First, it makes a woeful response to the acknowledged need for 490 affordable units per year. AND it demands that the Plan's greenfield developments must bear (at 40%) an excessive share of the affordable housing burden.
- 2.4 A more equitable approach should be for the Plan to return to first principles: to meet the obligation to provide for its own assessed housing need of 14,160 new homes, and then to apply to that figure a 30% affordable housing rate. Persimmon Homes cannot support the Plan's basic denial of housing need and then compounding the problem by placing unfair reliance on the limited number of greenfield sites to make a disproportionate contribution.

3. Concluding Comments

- 3.1 It is clear the Council are not meeting their housing requirement. The obligation of 14,160 new homes has been addressed by site allocations intended to deliver only 3,672 homes. This is a monumental deficit which must be remedied through site allocations based on the sustainability precepts of the National Framework. More greenfield sites are needed in the Plan and, as part of that re-structuring of the Plan, the affordable housing burden on green field sites should be shifted to 30%.

Part 2 of these representations is concerned with Site Allocation A15.

Our submission endorses the allocation of the site, with an estimated yield of 123 dwellings.

Part 2: Delivery Statement:

Allocation A15 –

Land at Upper Brighton Road

1. Introduction

- 1.1 This Delivery Statement is submitted in support of (a) the Council's allocation of Site A15, the Persimmon Homes (controlled) land for housing and public open space, and (b) sets out the site's credentials as a suitable and deliverable housing allocation.
- 1.2 Our development proposals have been shaped first and foremost by an expert landscape assessment, undertaken by CSA Environmental Consultants. The conclusions of that work have been distilled into the attached masterplan.
- 1.3 In summary, the site can accommodate approximately 123 homes, split between two parcels of land, including 30% affordable housing, together with public open space. The latter is principally along the site's eastern edge, to safeguard the visual amenity of the strategic gap.

2. The Site Description and Location

- 2.1 The land which is the subject of this submission is presented on the two plans in the Appendix: the first is the wider context for the site; the second is an aerial photograph with a red-lined boundary, delineating Persimmon's controlled land. As noted above, there are two separate parcels of land.
- 2.2 The site, which extends to some 7.5 hectares, is situated on the north-eastern edge of Worthing, and is currently in agricultural use. It forms part of the Sompting Estate, and there is no built coverage of any kind within the site.
- 2.3 The site comprises two parcels of land shown in Appendix 2. Principally, the southern parcel (Area A) is a large arable field, located in the centre, with smaller improved and semi-improved grassland fields and patches of ground, from previous construction work along the site's eastern boundary – this (electricity) easement forms the eastern limit to development. Broadleaved woodland, ditches and hedgerows are also present. The northern parcel (Area B) is a rectangular arable field adjoining the A27.
- 2.4 The surrounding area, to the south and west, comprises residential properties; plus, Bramber Primary School is located immediately bordering the western boundary of the site (part of the land is already leased to the school as playing fields).
- 2.5 The site relates well to the existing urban area: the north and western boundaries abut the existing settlement edge while the eastern boundary abuts the edge of open countryside. Immediately adjoining the northern boundary of the northern parcel is the A27 and beyond the A27 is the southern edge of the South Downs National Park.

- 2.6 To the east, is the Worthing – Sompting Strategic Gap and an area of small-scale fields criss-crossed by ditches and water courses lined by hedgerows and riparian trees.
- 2.7 Further south, accessed via Sompting Road, is an industrial estate and business park with a broad range of enterprises. And to the north-east, at the junction of Upper Brighton Road and the A27, is a retail park including Sainsbury's and B&Q. The site is, unquestionably, a sustainable location for new housing.

3. Planning Context

- 3.1 Part 1 of this submission demonstrates that Worthing Borough's housing need is particularly acute and the subject site (Site Allocation A15 - Upper Brighton Road) is fully supported.
- 3.2 The key benefits of the proposed housing allocation of the subject site are as follows:
- Worthing Borough are required to find a minimum of 885 homes per annum and selective countryside releases are a vital necessary expedient to accommodate this need;
 - There are no special planning designations affecting the site;
 - The site is very well-related to the existing built fabric, with development on two of its boundaries, and partially along the third/ north boundary;
 - There are no international or nationally designated sites for ecology within the land or in proximity to the site;
 - There are no flood constraints;
 - It is a highly sustainable location for development, being within walking distance of Bramber Primary School and in close proximity to a retail and business park;
 - The land has 'urban fringe' qualities through its proximity to the settlement edge and previous (scarring) construction works: it therefore has limited intrinsic landscape value or character;
 - There are direct connections to the local road network and adjoining schools.

4. Landscape Assessment

- 4.1 CSA Environmental was instructed by Persimmon to undertake a landscape and visual overview of both parcels, running from December 2016 through to March 2021.
- 4.2 The site is not covered by any designations relating to its landscape character and quality: it is visually contained by existing development in some form on three of its boundaries; and the site relates well to the adjacent urban area. As noted in the CSA assessment of the site:
- “The Site as a whole is pleasant, with no distinguishing characteristics, and given its mixed use, it has a fragmented feel. The Site is therefore considered to be of medium landscape quality”.***
- 4.3 The CSA report notes that the land is fairly well contained by boundary hedgerows and some trees, although the north western and north eastern boundaries are more open. Contextually, the area is influenced by strong suburban elements (nearby) and the Site is assessed as being of medium-overall-quality and value.

- 4.4 The site is visually well contained in views beyond the immediate vicinity to the south, west and east, while there are some longer views from footpaths in the SDNP, to the north of the Site.
- 4.5 The land is visually well contained by views beyond the immediate vicinity to the south and west, while the eastern site boundary provides containment, as does the small-scale fields to its east, which effectively separate the site from the rest of the Worthing – Sompting Gap. CSA concluded that development would not result in a material change to the overall functioning and purpose of the Gap.
- 4.6 The majority of existing landscape features on the site, including the boundary hedgerows, and the internal hedgerow lining the watercourse will be retained, together with enhancement-planting to the eastern Site boundary – which will help to provide a strong physical boundary to the Worthing – Sompting Gap.
- 4.7 This appraisal, therefore, considers that the Site is capable of accommodating development in line with the principles set out in section 5, without resulting in material harm to the landscape and visual character of the surrounding countryside, and to the SDNP.
- 4.8 Overall, (a) there are few landscape and visual constraints within the body of the site, (b) new housing would be well related to the existing settlement pattern and (c) contained by neighbouring development. Moreover, the majority of the existing low-level landscape features do not pose a significant constraint to development, while the retention of the existing hedgerows to the south would provide a robust boundary to the redefined settlement edge.
- 4.9 To sum up, the proposed development edge will be no more perceptible than the current built-up boundary, when allied with the retained / strengthened green buffer along the site's eastern edge.

5. Access Considerations

- 5.1 The site is well located to the existing road network – in fact, the northern boundary is defined by Upper Brighton Road, from which access will be taken. The latter is a two-way residential road and it is proposed to improve the alignment of this road and introduce a footpath on its southern edge.
- 5.2 Upper Brighton Road has a west-east alignment, which leads into West Street, towards West Sompting, on its eastern end. As mentioned earlier, the strategy for development at the site would involve realigning Upper Brighton Road and creating two new spurs to both parcels (north and south of Upper Brighton Road), via a new T-junction.
- 5.3 The site is accessible on-foot to a good array of local schools and amenities. In terms of sustainability, its relationship to nearby facilities means it scores very well in terms of providing future residents with opportunities to adopt sustainable/ low-impact modes of travel.

6. Ecology

- 6.1 As noted earlier, the overall site comprises large arable fields, with smaller improved and semi-improved grassland fields and patches of colonizing ground from previous construction work. Broadleaved woodland, ditches and hedgerows are also present. CSA Consulting has undertaken detailed ecological surveys over a three-year period to determine whether any notable or protected species are present.
- 6.2 These established that the vegetated field boundaries and hedgerows are used by common bat species, for mostly foraging and some commuting purposes. The majority of the proposed housing development is to take place within the site in a manner which allows all hedgerows to be retained with some limited/partial removal to facilitate access.
- 6.3 The CSA recommendations are to retain all boundary features and hedgerows and Persimmon Homes will seek to strengthen them with new hedgerow and allied planting. Broadly speaking, there is certainly the opportunity for habitat creation and enhancement in the open space; and further measures are proposed to address potential impacts to protected species during construction.
- 6.4 Looking further afield, mitigation measures are proposed to minimise the impact on the neighbouring Lower Cokeham Reedbed, and also to Ditches Local Wildlife Site (LWS).
- 6.5 CSA Consulting have made recommendations to provide additional nesting / roosting and feeding opportunities for birds, bats and invertebrates, for incorporation in the final design, and it is intended that native trees and shrubs, and a wildflower meadow are planted as part of the landscaping on site. Log piles for reptiles and amphibians are incorporated alongside hedgehog dispersal features.
- 6.6 With the implementation of the mitigation, compensation and enhancement, the development is anticipated to result in significant beneficial effects at the site vis-à-vis hedgerows, bats and reptiles and would accord with the relevant nature conservation legislation, as well as with the provisions of Policy 31 (Adur Local Plan, 2017).

7. Drainage

- 7.1 Initial survey work has been undertaken to consider flood risk and drainage issues at the Site: the land proposed for housing in the attached masterplan is located within flood zone 1 (having less than a 1 in a 1,000-year event).
- 7.2 The assessment and allied recommendations proposed that surface water drainage will be connected through a series of pipes and permeable paving into a series of balancing ponds. Permeable paving is proposed in the minor access roads and private drives that will store and control the discharge of surface water into storage facilities. Given the permeability of the soil it is possible it is possible for the scheme to use infiltration measures such as soakaways.
- 7.3 The balancing ponds/ SUDs features will provide benefit in terms of water quality, bio-diversity and the opportunity for an aesthetic enhancement within the layout.

8. Design

- 8.1 First and foremost, the proposed layout can be weaved comfortably into the site's locational setting. It is to be a partnership of an informal housing layout, multi-faceted landscaping and broad areas of open space, transitioning into the countryside beyond. Some 123 units are proposed overall, interspersed with structural landscaping and open space.
- 8.2 The Council's parking standards, back garden standards and open space requirements can be fully embraced. The majority of the units are detached or semi-detached, befitting this semi-rural location – in terms of the ratio between built footprint and open areas.
- 8.3 The housing is set informally within clusters, taking advantage of the soft edges of existing hedgerows and trees, and by juxtaposition with public open spaces. The site's constraints and opportunities may be summarised as follows.
- Existing boundary trees and hedgerows
 - The existing footpath, connecting Upper Brighton Road, to Bramber School, bisects the site diagonally
 - Electricity easement, associated with the off-shore wind farm, delineates the eastern boundary
 - Proximity of the A27 will require an acoustic assessment
 - Recreational routes with the POS should avoid hedgerows and drains where breeding birds were recorded
 - New access from Upper Brighton Road to both parcels
 - Pedestrian link to the school on the western boundary
 - Creation of the SUDs feature in the southern and eastern edge as part of the green infrastructure/drainage strategy
 - Open space area/ LEAP on the eastern boundary and LAP to provide play opportunities and provide reptile receptor
 - Strategic planting of landscape/trees along the main spine road to create a green corridor
 - Retention of views across adjacent countryside towards Sompting.
- 8.4 Each unit will be built to Nationally Described Space Standards, and the layout provides the required number of parking spaces, and electric charging points will be incorporated.
- 8.5 Overall, the scheme makes an efficient use of land, offers a high quality open-space orientated environment, and a development configuration which manages the transition to countryside beyond through the inclusion of the eastern belt of POS. That open space component defers to wildlife and habitat diversity.

9. Sustainability and Deliverability

- 9.1 The site scores well vis-à-vis the broader remit of sustainability, as expressed in Paragraph 7 of the NPPF - social, environmental and economic benefits. It is very well placed in relation to a wider range of local facilities including schools, shops and healthcare. And this list will be boosted by the open space and play facilities which are to be incorporated in the development scheme.
- 9.2 Finally, there are no impediments to the site's delivery: it is immediately available for development and capable of implementation within the next 12 months. In other words, it is capable of contributing to the Borough's housing needs and obligations immediately.

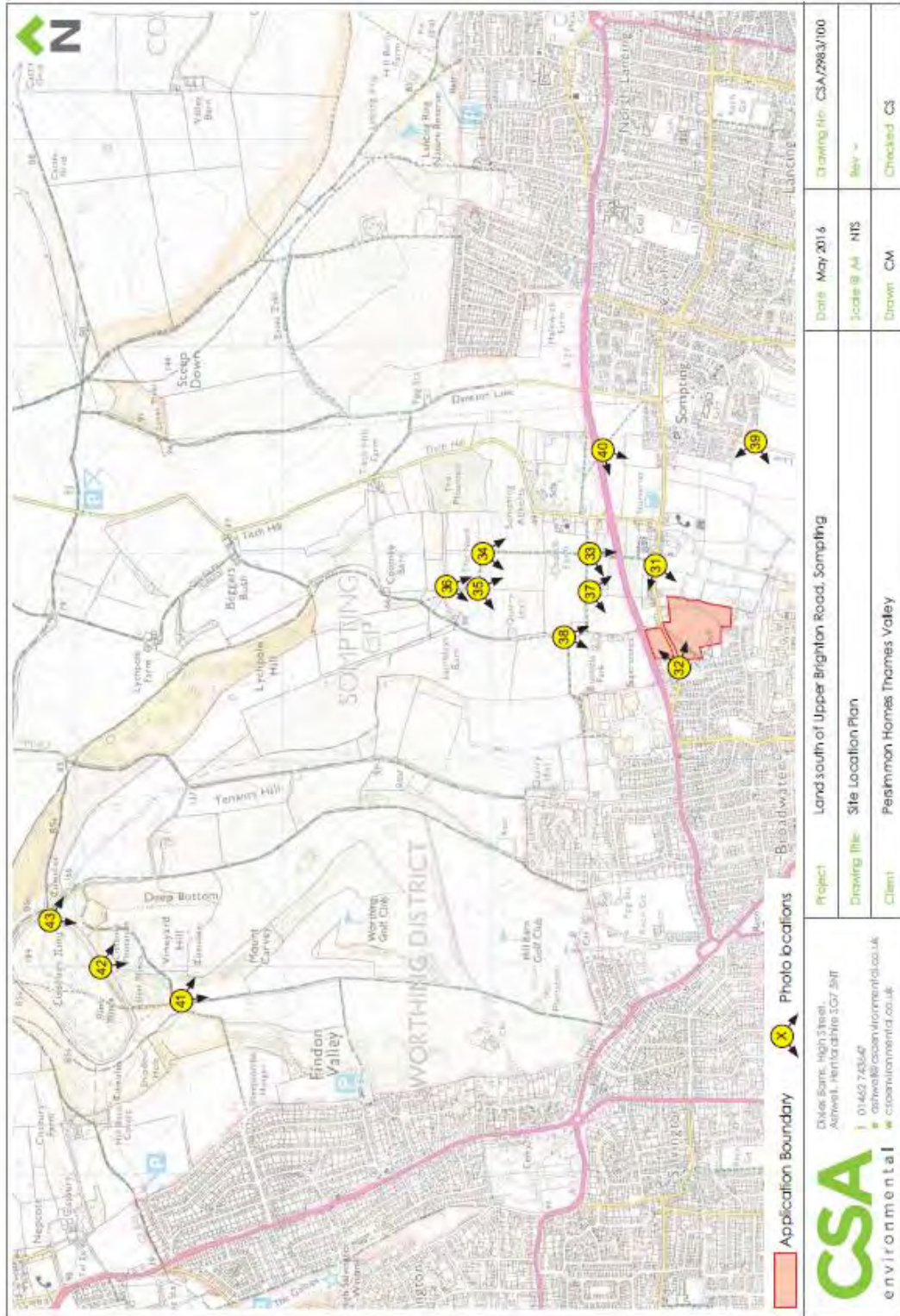
10. Concluding Comments

- 10.1 This Delivery Statement has two functions. Firstly, it supports the allocation of this land (Site Allocation A15) for housing and open space. Secondly, it sets out the site's credentials as a suitable and deliverable housing site in accordance with the NPPF.
- 10.2 The planning authority has, of course, identified the site, via the current Local Plan Consultation, as being suitable for 123 new dwellings and the local infrastructure can accommodate this capacity. The context for the designation is the Borough-wide requirement for 885 new homes per year. However, Worthing Borough Council is signalling a land supply of approximately 1.3 years – a long way short of the standard 5-year obligation. Thus, there is a pressing need for new housing and it reinforces the candidature of this site.
- 10.3 The 4-year rolling site appraisal by CSA Consulting established that there are few visual features / wildlife features of note. And our proposed confinement of development to the west of the electricity easement safeguards the more open prospect further east. Also, of note, the site is contained visually by housing on at least two of its boundaries, so its profile in the wider landscape is limited.
- 10.4 Maintaining that characteristic means there is the need for a transitional / open zone eastward of the proposed new housing. That is the purpose of the generous belt of POS on the eastern flank of the site - providing an extensive area for landscaping and wildlife; and the intended water features will maximise habitat diversity.
- 10.5 Finally, Persimmon Homes have undertaken the necessary technical studies to confirm the site's suitability for development: there are no physical, technical or infrastructure deficiencies that will impede the implementation of the (estimated) 123 dwellings for which the site is earmarked. This allocation is capable of implementation within the next 12 months, subject of course to the necessary approvals. We commend the site for inclusion in the final version of the Local Plan.

Persimmon Homes, March 2021.

APPENDICES

Appendix 1: The subject site in its wider context



Appendix 2: Aerial Photograph



Draft Local Plan Consultation Submission

Part A. - Contact Details

Councillor Helen Silman and Councillor Jim Deen

Organisation: The Labour Group of councillors in Worthing Borough Council.

Councillors Silman and Deen are delegated by the Labour Group to write this submission.

The Leader of the Labour Group councillor Beccy Cooper has endorsed the submission with the consensus of the Group members.

Address: The Labour Hall, 119 Lyndhurst Road. Worthing BN112DE
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Signed: Councillor Helen J Silman HJS

Councillor Jim Deen JD

This submission Draft Local Plan relates to the whole DLP

We find: the Draft Local Plan is legally compliant and that the Duty to Cooperate has been fulfilled

We find the Draft Local Plan to be unsound.

The reasons for finding the DLP to be UNSOUND follow.

1.27. The DLP should be read as a whole. It is therefore important that individual policies are not considered in isolation.

For this reason our comments and observations are relevant to the strategy, policies and proposals set out in the DLP as a whole.

Site specific observations are included in our submission, but all sites are covered by our general remarks.

The DLP is not sound because 1. it is not justified and 2. it is not deliverable.

1. It is not justified because reasonable alternatives have not been considered.
2. It is not deliverable because of the inherent contradiction between different

imperatives in the DLP which cannot be satisfactorily reconciled.

1. The DLP is UNSOUND because it is not justified. It is not justified because no reasonable alternatives are considered.

The DLP (1.3 bullet point 6) sets out to tell Communities, Developers and Investors the development they can expect to see approved in the next 15 years.

Part 2 of the DLP 'Vision and Strategic Objectives' cannot be reasonably rejected. The objectives are all desirable. The flaw in the DLP is that only one way to deliver the vision is offered. Until now that way has achieved almost nothing.

The core of the DLP is in Part 3 'Spatial Strategy'; Part 4 Site Allocations and Part 5 Development Management Policies.

The strategy is grounded in the development documents produced by the current Conservative administration 'Platform for our Places' 'Going Further' 'And Then'. Consequently the DLP is politically driven, being primarily focussed on major sites in the Town Centre, rather than having a wide all town approach. The blinkered targetting of inward investors inhibits imaginative thinking and the inclusion of local communities, investors and local enterprises in determining the kind of developments appropriate for Worthing.

No reasonable alternative criteria for development have been incorporated into the DLP even though alternative ideas for development were included in the public consultations held in 2016 and 2019. Many innovative ideas for urban development are being widely discussed in this time of great financial, social and economic uncertainty in the wake of the Covid pandemic. The Draft Local Plan before us has been substantially prepared before the pandemic and its increasingly concerning aftermath. The likelihood of public services and infrastructure providers being able to deliver the desired services and infrastructure necessary to accomplish the Part 2 vision is remote.

The DLP must look at alternative ways to bring about qualitative improvement and development across the town, while responding to the Climate Change imperatives to reduce CO2 emissions and to adapt to and to mitigate the effects of Climate Change. This is equally true for site development and public realm development.

Below is a list of some of the alternative approaches that we would like to see incorporated into a revised Plan.

- a. Engaging with the local residents before plans are brought forward for Public Realm or major sites and maintaining engagement as plans are developed.
- b. breaking up sites into smaller areas to attract more local investment and delivery.
- c. Council becoming a Registered Social Landlord.
- d. Promoting and facilitating local cooperatives for home building and sustainable local public transport projects.

- e. Raising capital by issuing Worthing Bonds for regeneration/development of a specific site such as The Lido.
- f. Promoting and facilitating Neighbourhood Forums/Neighbourhood Plans as allowed for in the 2011 Localism Act.
- g Hold a Citizen's Assembly for the Built Environment – Developments and Regeneration in Worthing.

2. The Draft Local Plan is UNSOUND because it is not deliverable on account of the inherent contradiction between different imperatives in the Plan.

The inherent contradiction fundamentally arises from the geographical realities of the Borough's position which severely limits the land available for every kind of development.

If land were unlimited all imperatives could be satisfied.

The Plan sets out to tell Communities, Developers and Investors the development they can expect (1.3 bullet point 6) to see approved in the next 15 years and sets out the essential criteria for its delivery in Parts 3,4 and 5.

The overriding demand to respond to the objectively assessed housing need for homes in Worthing, coupled with building a strong economy drives the development Plan for the next 15 years.

Equally important is the imperative to ensure that all development, including the necessary infrastructure to support it, is delivered and managed sustainably in accordance with NPPF and the 17 UN Sustainable Development Goals which are embedded in the Draft Local Plan 1.25.

The DLP aspires to integrate new developments into existing communities, and to respect Conservation areas and Heritage Places.

Yet we already know from sites with outline planning approval such as Union Place that in practice scant regard is paid to any of those aspirations. All too often the administration's attraction for large characterless buildings on prime sites in the Town Centre trump all other considerations. There have been no imaginative efforts to develop sites in conjunction with local communities to complement and enhance our position tucked beneath the South Downs and facing the English Channel.

DLP Part 4 A14 Union Place is being used to illustrate our argument that aspirations for quality developments are not matched in practice, thereby making the DLP undeliverable.

An outline application for the long vacant, prominent Union Place development site was presented to the Worthing Planning Committee on November 4th 2020 with a

recommendation for approval. The application was made jointly by WBC and investment company LCR. As a WBC application it aptly illustrates the way such sites are to be treated in relation to the vision in the DLP.

The site is surrounded on all sides by conservation areas and is bordered by a number of historic buildings, a number with Grade II listed status as would be expected as the site lies within the historic centre of the town. Not unexpectedly the application received criticism from Historic England and the Worthing Society for the failure of the indicative design to respect the historic setting, but also a wide range of other criticisms concerning scale, massing, density, limited public realm and so on. And a general criticism that the development did not reflect the character of Worthing which strikes at the heart of the DLP.

But, rather bizarrely, the approach to the development of this site was to meet the demands of the strategy presented in Platforms for our Places, and its failure to meet the core principles in the DLP is justified as the exception that will allow the DLP to be implemented in full elsewhere.

That same exception is being applied to other prominent development sites such as the Gasworks site in Lyndhurst Road (A9) and if applied to all such brownfield sites, where inevitably the major part of Worthing's development will take place, it renders the aspirations of the DLP incapable of delivery as so much of the development will be deemed 'exceptional'.

This dearth of ideas is apparent in Public Realm areas as well. DM6 – Public Realm 5.75, 5.76 and 5.77 set out fine aspirations and the importance of good public realm is rightly given prominence. Its value in creating a sense of place, supporting residents' well-being, being accessible to all is appropriately recognised. The reality of the plans for public realm improvement proposed in 2017 and incorporated into 'Platforms for our Places' and its derivatives, illustrate how unlikely it is that those aspirations for good public realm will be achieved.

The 2017 plan, prepared in consultation with the most likely major funder WSCC, was exciting and innovative with a series of projects for parts of the pedestrian routes linking the main railway station with the Pier at the junction between the Promenade and South Street.

The plan was adopted. The only part to get off the drawing board is due to start construction in 2022. It is arguably the least significant element of the 2017 plan – the pedestrianisation of Portland Road – a minor road leading off Montague Street. It is rarely used as a route from the station to the town centre and Promenade, unlike South Street. In total 16 active businesses in the road may benefit. Residents and visitors are being offered a resurfaced walkway, stone benches, a few trees in containers and replacement bicycle racks.

The exciting element of the original public realm plan for South Street which is the major link between the station, the town centre, the Pier and Promenade has come to nothing in spite of it leading directly to the focal point of the sea front – the iconic Pier, Theatre and Lido.

As long as the DLP is linked inextricably to the 'Platforms for our Places' strategy and policies we consider it most improbable that the DM6 aspirations will be deliverable.

DENSITY DM2

Worthing's geography will always limit the amount of land available for development, even when brown field sites are taken into account.

But if an attempt to compensate for this, by ever increasing density coupled with an ever declining provision of green amenity spaces, goes ahead, other elements necessary to support strong, vibrant and healthy communities 1.24 will be undeliverable. Part 5 Development Management Policies Environment Policies DM 18 ,19 and 20 will be especially vulnerable to dilution.

This makes the Draft Local Plan undeliverable.

We acknowledge the need to increase density in some developments because of the urgent need for homes. Increased density should however reflect the DM1 and SHMA policies and ensure a significant number of 2/3 bedroomed homes are provided in all large new developments. The demands made by developers should not override what needs to be done to implement the vision set out in all sections of Part 2 of the DLP and elaborated in Part 5.

The vision in Part 2 is not compatible with the delivery of the goals set out in Parts 3 and 4.

The Draft Local Plan is consequently unsound because incapable of delivery in accordance with the Social and Environmental aims set out in the DLP.

We would urge a recasting of the DLP to better balance the competing interests around development and to seriously consider other ways to develop and regenerate Worthing.

A most timely report was published today by the British Academy ' The COVID Decade: understanding the long term societal impact of Covid-19.

It should inform a revision of the Draft Local Plan which is now less fitted for the next few years when financial investment is likely to decline alongside contracting public services and infrastructure provision.

We consider it necessary to participate at the oral part of the examination because our assertion that the Draft Local Plan is unsound because unjustifiable and undeliverable in large part, requires some detailed elaboration.

Signed: Councillor Helen Silman HJS

Signed: Councillor Jim Deen JD

Dated 23rd March 2021

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Worthing Borough Council
Planning Policy
Portland House
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Worthing
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Our ref: AH/RB

23 March 2021

Dear Sir/Madam

WORTHING LOCAL PLAN 2020-2036 – REGULATION 19 CONSULTATION - REPRESENTATIONS

On behalf of our client, Southern Gas Networks (SGN), we submit representations to Worthing Borough Council's ('the Council') Regulation 19 consultation on its emerging Worthing Local Plan 2020-2036 (WLP). Our client is the freehold owner of the former gas holder site accessed off Barrington Road ('the site'). The extent of this ownership is shown on plans appended to this letter.

SGN originally owned and managed 110 gasholders across the UK (mainly located in Scotland and the South East of England). However, the gasholders themselves are no longer required for gas storage purposes as advances in technology allow gas pressure to be controlled and stored within an underground pipeline network.

SGN have an obligation to dismantle all their gasholders by 2029. The gas holder formerly on this site has been removed as part of this process and as a result, the site is considered deliverable within the first five years of the plan period.

Purpose of these Representations – Why the Worthing Local Plan 2020-2036 is Unsound

NPPF Paragraph 35 states that Local Plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether their content is sound. Plans are considered sound if they are (inter alia):

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – informed by an appropriate strategy, taking into account the reasonable alternatives, including being based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

- **Consistent with national policy** – enable the delivery of sustainable development in accordance with the policies of the Framework.

We consider that draft Policy SS2 (**Site Allocations**) (and in particular draft allocation A10 – Martlets Way) is unsound, as it fails to deliver an appropriate strategy to meet forecasted needs for the area, particularly with regards to housing. We set out below in detail the reasons why we consider draft Policy SS2 / draft Allocation A10, as they are currently set out, are not sound, but in short, they:

- **Are not Positively prepared** – whilst we acknowledge that the draft WLP will not be able to meet in full both the area’s housing need, predominantly due to insufficient available land, we consider the Council has not adequately balanced the need for different uses, particularly with regard to the character and context of draft allocation A10;
- **Are not Justified** – the Council has not proportionately considered the available evidence to reach its conclusion on a suitable balance. It has not considered reasonable alternatives for draft allocation A10 – including its potential to deliver a defined housing target;
- **Are not Effective** – in failing to achieve an appropriate balance between development need, particularly with regard to a substantial shortfall in housing delivery, the Council has not maximised the effectiveness of the draft WLP and its potential to deliver a greater target within the plan period and within its own area, deferring rather than dealing with matters of unmet need;
- **Are not Consistent with national policy** – the plan does not enable the delivery of sustainable development in accordance with the policies of the Framework, including achieving appropriate densities on previously developed land.

Addressing Development Needs: Housing vs. Employment

Given Worthing is a particularly constrained borough, we accept there will inevitably be a trade-off between different development needs. However, with limited available and appropriate space left within the built-up area (which includes SGN’s site and land with draft allocation A10) it is imperative upon the Council to plan for its most suitable and effective use.

To determine the most suitable and effective use, regard should be given to the delivery of sustainable development. As per the requirements of NPPF paragraph 8, sustainable development has a social, economic and environmental objective. Whilst independent and possessing their own aims, paragraph 8 encourages the need to pursue them in mutually supporting ways, in order to ensure opportunities can be taken to achieve net gains across all objectives.

NPPF Paragraph 20a) states that strategic policies ‘*should set out an overall strategy for the pattern scale and quality of development and **make sufficient provision**¹² for housing (including affordable housing), employment, retail, leisure and other commercial development*’. Footnote 12 makes clear that “sufficient provision” should be in line with the presumption in favour of delivering sustainable development.

With regard to draft allocation A10, we consider that the Council has not made sufficient attempts to address its objectively assessed housing need (OAHN), with too great an emphasis placed on delivering employment land. In consideration of the evidence supporting the plan and the planning context behind it, we consider that this approach is not justified. As we set out later, the Council has failed to appreciate the opportunity the land earmarked for development in draft allocation A10 has to deliver much-needed housing as part of a mixed-use development scheme.

Housing Need and Evidence

The Local Housing Need (LHN) for the plan period (2020-2036) is calculated at 14,160 dwellings, or 885 dwellings per annum (dpa). We emphasise that this need is both absolute, a minimum figure to be planned for, and has not been challenged by the Council.

However, as detailed at paragraph 3.21, the draft WLP makes provision for a substantially smaller number of 3,672 dwellings, or 230 dpa. This is supported by a table, which we have replicated below:

Sources of Housing Supply (2020-2036)	Number of Dwellings
Commitments	909
Windfalls	871
SHLAA Sites (not including those incorporated as allocations)	138
Local Plan Allocations	1753
TOTAL SUPPLY (ALL SOURCES)	3672
ANNUAL TARGET (2020-2036)	230

As recognised by the Council (paragraph 3.27 of the WLP) this equates to only **26%** of total housing need and a shortfall of over 10,000 dwellings. This falls well beneath the expectation of the government’s aim to significantly boost the supply of housing, which is in significant need in Worthing.

The latest Authority Monitoring Report 2019-20 confirms that the Council have just 1.15 years supply of deliverable housing sites, when measured against LHN. In addition, annual delivery rates – which although have increased in recent years – still fall well short of what is expected. This was most recently observed in the results of the 2020 Housing Delivery Test (HDT) which confirmed that only 52% of the homes required were delivered in the period 2017/18 – 2019/20. As set out in NPPF paragraph 215), such a score is considered to demonstrate delivery of housing “*substantially below*” what is expected by Government, thus engaging the presumption in favour of sustainable development at Paragraph 11 of the NPPF.

As is set out in the Duty to Cooperate Statement (January 2021) we recognise that there is widespread shortfall across West Sussex and the surrounding areas, predominantly due to environmental and physical constraints. As such, we support the ongoing review of the Local Strategic Statement (‘LSS3’) across the Housing Market Areas (HMAs) and Functional Economic Market Areas (FEMAs) with the aim of meeting issues in the longer term. However, as indicated at paragraph 6.10 of the document, we echo the concerns of Arun District Council that insufficient evidence on density and capacity matters has been taken into consideration by the Council in satisfying its housing need within its own boundaries. We return to this below.

Employment Need and Evidence

The draft WLP is supported by an Employment Land Review (ELR), initially undertaken in April 2016 with a focused update provided in September 2020. In comparison to housing, defining a need for employment land is more complex and required to take into consideration a number of factors – both quantitative and qualitative.

Initially, the ELR sets out the employment floorspace requirements for office (B1a / B1b), industrial (B1c / B2) and distribution (B8) uses over four growth scenarios. Table 2.12 of the ELR sets out the floorspace requirements (in sqm) for each use over the four scenarios:

Use	Job Growth (Baseline)	Past Take-Up	Labour Supply (885 dpa)	Labour Supply (246 dpa)
Office (B1a / B1b)	9,790	5,040	12,815	-7,985
Industrial (B1c / B2)	-1,530	34,200	7,560	-33,995
Distribution (B8)	24,300	22,320	28,920	-7,560
TOTAL	32,560	61,560	49,295	-49,450

We note that the labour supply scenario based on the Council's preferred housing target of 246dpa would in fact result in a negative requirement for employment land, which is indicative of the growth it supports. However, we do support the conclusions of the ELR that the Council should seek to achieve, insofar as possible, the baseline job growth scenario (Column 1 above) in order to plan positively in line with the aims of NPPF paragraphs 80 and 82 (i.e. not to deallocate employment land).

As set out in draft Policy SS2, the Council make provision for a minimum of 28,000sqm of industrial and warehousing floorspace – including 18,000sqm to be provided as part of draft allocation A5 (Decoy Farm) and 10,000sqm to be provided as part of draft allocation A10. The combined requirement of the ELR's preferred job growth scenario for industrial and distribution in Table 2.12 is 22,770sqm (24,300 + -1530). This indicates that the employment land allocations within draft Policy SS2 amounts to a surplus of 5,230sqm of floorspace, or **123%** of need.

Whilst we recognise that forecasting employment need must factor in qualitative factors – which include the recent introduction of Use Class E and the extension of Permitted Development Rights, as well as concerns with the quality of existing industrial land – it is clear that the planned development for employment need would far outweigh planned housing supply.

Conclusion

Whilst SGN support the need for employment uses to form part of draft allocation A10, the evidence suggests that the existing employment land position Worthing is far stronger than its housing land supply position. As a consequence, we believe the Council could do more to recalibrate the balance between housing and employment provision on the site, emphasising and delivering mixed-use development on the site.

By combining elements of both residential and employment on the site, draft allocation A10 would allow for a more suitable use of the site in line with the aims of sustainable development. We set out our case for this further below.

Delivering Housing on draft Allocation A10

As presently drafted, draft allocation A10 allows for an undefined "element" of residential development to be delivered on land to the south (referred to as 'the nib') accessed from the HRMC site (draft allocation A8) to the east, *"only if it can facilitate the delivery of employment floorspace at Martlets Way and provide for the former gasholder site to be brought forward"*.

We consider it is not an appropriate or justified approach to deliver solely a defined employment land target for site. In lieu of a substantial shortfall in both past delivery and planned future provision of housing, as well as an imbalance between housing and employment delivery, it is imperative upon the Council to also define a fixed housing target for draft allocation A10. Residential development is not only clearly required, but suitable and achievable on this site.

We note that the Council has chosen to pursue mixed-use sites elsewhere in the borough and has decided to implement fixed housing targets on these allocations where possible. It is not clear why draft allocation A10 has been made exempt.

NPPF Paragraph 9 states that *'planning policies [...] should play an active role in guiding development towards sustainable solutions, but in doing so **should take local circumstances into account, to reflect the character, needs and opportunities of each area**' (our emphasis).*

We consider there are several elements of the site's local circumstances that would justify a defined housing target.

Sustainable Location

Aside from being one of the few locations left within the built-up area to be developed, the site is sustainably located to support a significant amount of residential development outright. The site benefits from close access to several key services along Shaftesbury Avenue to the west, including a leisure centre, medical centre and shops. The site is also located in close proximity to Durrington-on-Sea train station. This station provides rail services to Brighton (1 train per hour off peak), London Victoria (2 train per hour off peak) and Southampton Central (1 train per hour), increasing in frequency during peak periods as well as including Thameslink services to London Bridge. The centre of the site can be accessed in 12 minutes by foot using the existing railway bridge north of the HMRC site.

NPPF paragraph 108 states that when assessing sites that may be allocated for development in plans, it should be ensured that *"appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location"*.

We consider the absence of fixed residential development on this site, particularly given the significantly shortfall proposed in the plan, has not taken the appropriate opportunity to promote sustainable transport modes.

Densities

NPPF paragraph 117 states:

"Planning policies [...] should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land".

Bringing forward draft allocation A10 as a predominant employment allocation would fail to appreciate the potential of the site from a density perspective. The space requirements of such employment use means that land is lost compared to residential uses that can otherwise be built at higher densities.

In lieu of the surrounding area, and the location of the development close to Durrington-on-Sea train station, there is potential for higher density housing at this location. With regards to housing, NPPF paragraph 123 places particular emphasis on areas *"where there is an existing or anticipated shortage of land for meeting identified housing needs"* to *"avoid homes being built at low densities, and ensur[ing] that developments make optimal use of the potential of each site"*.

Overall, we consider the Council – in lieu of the site's context – has not chosen to optimise the potential density of the site. A sole employment allocation reduces the potential for densification, whilst greater density buildings for residential would satisfy need to a greater extent.

Access

Outline planning permission has been granted on the adjacent HRMC site, subject to the receipt of satisfactory additional and amended material, and the completion of a Section 106 (S106) (Ref: AWDM/1979/19).

We note and support that as part of this decision, Item 4 of the Heads of Terms refers to a requirement to provide access onto the western 'nib' land and further provision of access from the nib land beyond

into the area of SGN's site. We acknowledge this would allow for the comprehensive redevelopment of both the nib and the wider land within draft Allocation A10.

In light of a significant housing shortfall, and the unlocking of SGN's land through the creation of this access point, we consider that SGN's landholding (particularly to the south) would be able to facilitate a defined level of residential development beyond and associated with the nib, whilst not undermining the delivery of employment land as part of a mix of uses.

Conclusion

We consider that the Council should opt to define a fixed housing target for draft Allocation A10, in combination with employment use as part of a mixed-use development. This is not only in consideration of the imbalance between employment land provision and dwellings provided in the plan, but the bespoke ability for the site to deliver higher density residential development in a sustainable location.

Conclusions

In summary, we consider that the WLP as it is currently drafted and evidenced is unsound.

SGN support the inclusion of the former gasholder site as part of draft Allocation A10 (Martlets Way), which has been a long-standing area of planned change and regeneration for the Borough since the Core Strategy. SGN also recognise the need for an employment element to be delivered as part of draft allocation A10 in response to its surrounding local context, particularly to the west.

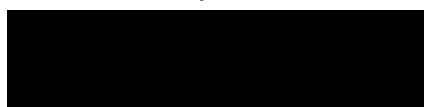
However, we consider that Worthing's housing need is in a more precarious position to its employment land need, with the local plan only satisfying 23% of its housing need, compared to 123% of its employment and industrial need. In recognition of the balance, the Council should offer greater balance between the two through a mixed-use scheme. The location of our client's site is optimal to provide a fixed figure of residential development, rather than an enabling figure, which can be provided at a high density given its sustainable location.

As a result, we urge the Council to reconsider the development potential of draft allocation A10, in the pursuit of delivering a more appropriate balance between its housing and employment need. SGN are willing to work with the Council and adjacent landowners to deliver a more appropriate allocation on this site.

We trust that the information enclosed clearly sets out the work that is required to ensure the WLP can be found sound. We ask the Council to undertake further assessment of the balance between employment and housing need of the site and ultimately recognise that housing should form a much more crucial role in this allocation. We request that these changes are made prior to its submission to the Secretary of State for examination. We also ask to be notified about future EIP hearing sessions.

Should you have any queries, please do not hesitate to contact me, or my colleague, Alister Henderson (alister.henderson@carterjonas.co.uk).

Yours Faithfully



Ross Brereton
Associate

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These are the notes referred to on the following official copy

The electronic official copy of the title plan follows this message.

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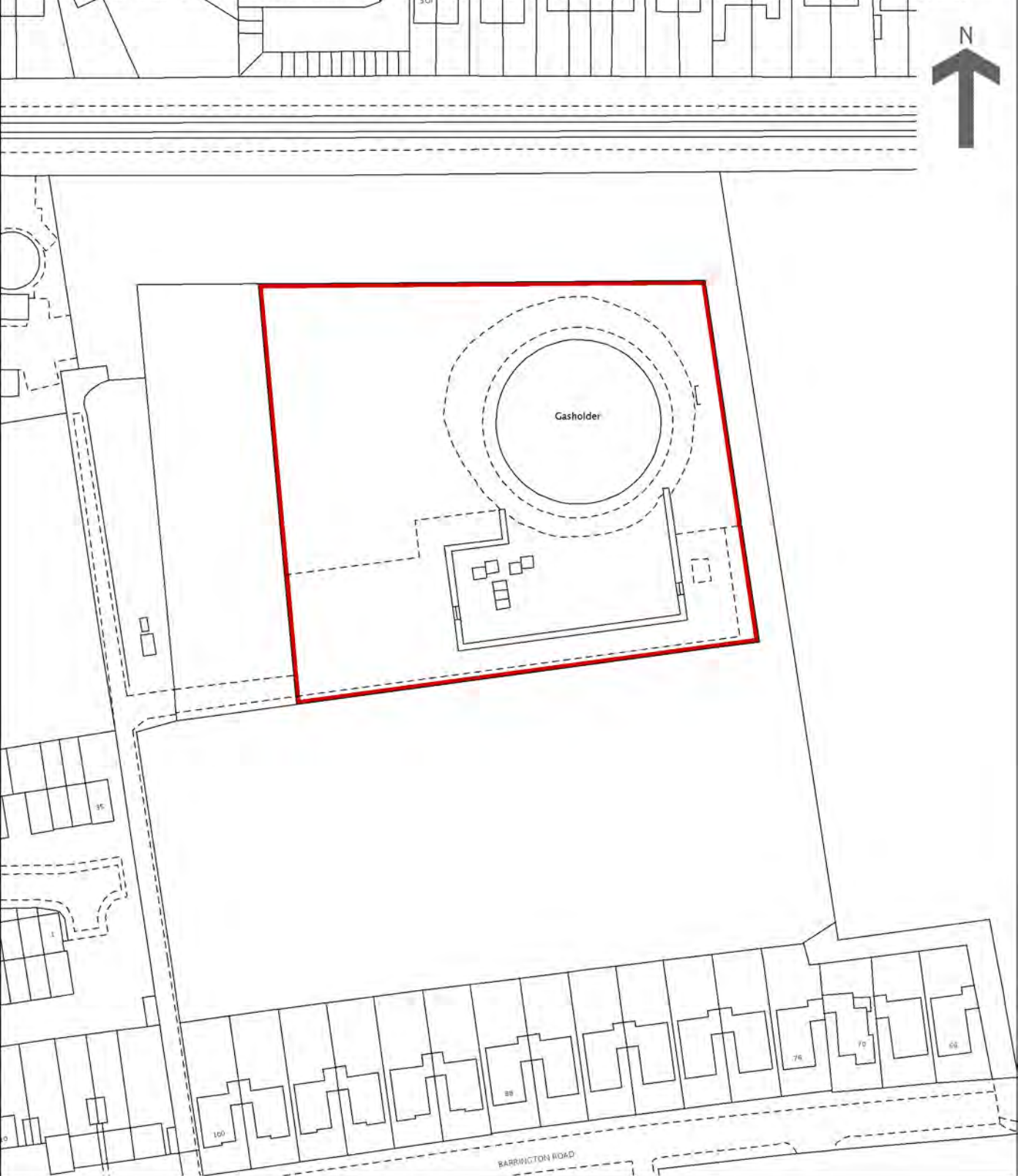
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Ordnance Survey map reference **TQ1103SE**
Scale **1:1250**
Administrative area **West Sussex : Worthing**



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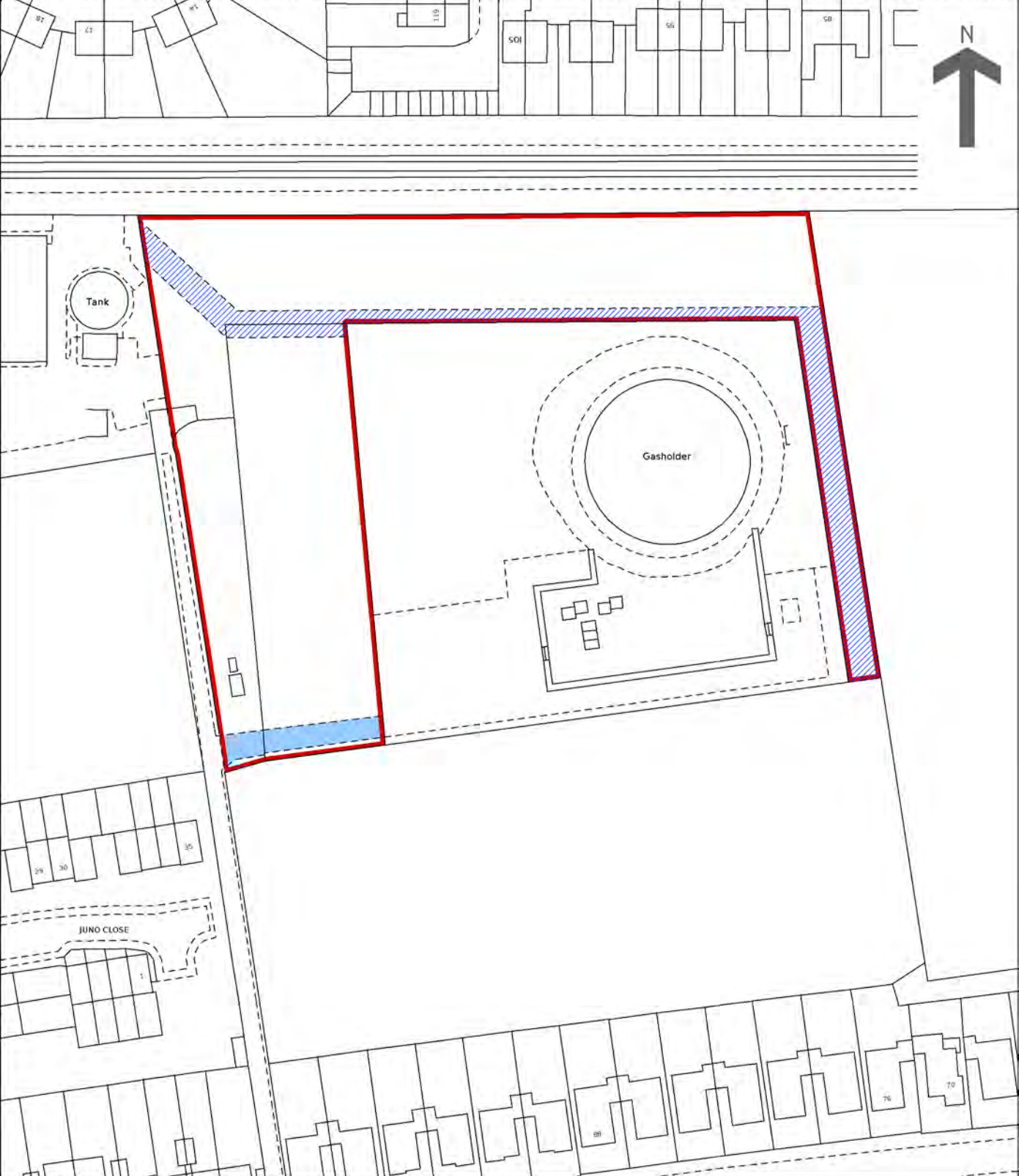


HM Land Registry Current title plan

Title number **WSX257367**
Ordnance Survey map reference **TQ1103SE**
Scale **1:1250**
Administrative area **West Sussex : Worthing**



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Ref: SDWLP-69

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23 March 2021
Please ask for: Neil Crowther
Group Head of Planning
Directorate of Place
Direct Line: (01903) 737839

Dear Ian Moody,

Submission Draft Worthing Local Plan Consultation - Regulation 19

Worthing has written (James Appleton's letter 29 January 2021) to Arun District Council seeking help towards accommodating Worthing's unmet housing need. You explained the reasons why Worthing is unable to accommodate all of its housing requirements, and that Worthing Borough has set this out in its evidence base, in support of its local plan consultation, which closes on 23 March 2021.

I am therefore, writing to you to advise of Arun District Council's response to Worthing Borough Council's Regulation 19 Publication Local Plan consultation, which also forms the basis for Arun's response to your letter. Arun wishes to cooperate constructively with Worthing and other adjacent authorities, on exploring how the significant level of unmet need might be tackled.

Arun's Planning Policy Sub-Committee has considered the matter and has agreed that it's outstanding objection to Worthing's Local Plan has been resolved, as we are satisfied that you have sought to maximise the level of housing that Worthing can accommodate.

However, the Sub-Committee is keen to ensure that a Statement of Common Ground is signed before Submission of the Plan, clarifying the mechanism, resources, process and timescales on how it is intended to resolve unmet need and how it is being addressed by Worthing Borough Council in cooperation with the relevant authorities (including Arun). The Planning Policy Sub-Committee agreed the following recommendation on 23 February 2021: -

1. *"That its outstanding objection to the Worthing Local Plan is resolved, however, Worthing Borough Council is urged to pause its plan timetable in order to progress Statement of Common Ground and joint working with neighbouring authorities within its Housing Market Area, in order to address the significant level of unmet housing need; and"*

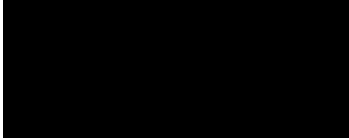
At our subsequent meeting on the 17th March we agreed that, in addition to the Statement of Common Ground which is to be signed between all Authorities in the Strategic Planning Board (West Sussex, National Park, Brighton and Hove City Council and Lewis DC), we would enter into a Statement of Common Ground between Arun and Worthing and other authorities in the Housing Market area, before Submission.

On signing of such a statement of Common Ground, Arun District Council would be reassured that the subsequent submission of Worthing's Local Plan for examination, will demonstrate the 'Duty to

Cooperate' through committing to, and setting out positive steps to working jointly and constructively, on an ongoing basis.

If you need to come back on any of the content of this letter, please don't hesitate to contact me via the Planning Policy & Conservation team at localplan@arun.gov.uk or tel:01903 737853.

Yours sincerely,



Neil Crowther (Group Head of Planning)

Arun District Council

CC:-

Karl Roberts (Director of Place), Arun District Council;

Kevin Owen (Team Leader Planning Policy & conservation), Arun District Council;

James Appleton (Head of Planning & Development), Worthing Borough Council

planning.policy@adur-worthing.gov.uk

Ref: SDWLP-70



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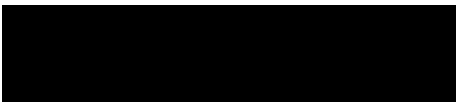
23rd March 2021

Dear Sir/ Madam,

Re: Regulation 19 (Publication Stage) of the Submission Draft Worthing Local Plan January 2021
Representations submitted by Persimmon Homes: Land at Manor Farm, Sea Lane, Ferring

Please find enclosed our representations to the Regulation 19 of the submission draft Worthing Local Plan.

Yours sincerely



Robert Clark
Land and Planning Director
Persimmon Homes Thames Valley

Enc. Worthing Borough Regulation 19 Representation Statement

WORTHING BOROUGH COUNCIL REGULATION 19 LOCAL PLAN

Formal Representations by Persimmon Homes

**The Submission covers three areas,
with highlighted headings in the text:**

- **The Plan's inadequate response to Housing Need**
- **Objection to Policy SS5 – Local Green Gaps, and Policy SS6 – Local Green Spaces**
- **Manor Farm, Sea Lane, Ferring – advocated as a suitable Development Site**

The Plan's Inadequate Response to Housing Need

1. Introduction

- 1.1 Persimmon Homes welcome the opportunity of submitting representations to Worthing Borough's Regulation 19 Local Plan.
- 1.2 The context for the Local Plan deserves to be highlighted in the strongest possible terms. First, it is undisputed that the Country is experiencing a deep-seated housing crisis which, in particular, affects the lives of people who cannot afford to buy a home today. Secondly, in Worthing Borough, and across all LPA's, the supply of homes must reflect (each) Council's objectively assessed need.
- 1.3 The emerging Local Plan, in Paragraph 3.13, explains there is a requirement for 14,160 homes across the plan period, which equates to 885 dwellings per annum. However, the emerging Local Plan only identifies a requirement of 3,672 dwellings over the plan period – resulting in an unmet need of 10,488 homes by 2036. This is manifestly unsound.
- 1.4 Paragraph 3.25 of the emerging Local Plan explains that the "edited" housing target of 3,672 dwellings, is a capacity-based figure, derived from the housing that can be delivered within the plan period in light of the identified constraints and potential development capacity. These are pivotal considerations, which demand forensic examination – because the Worthing deficit is unconscionable.
- 1.5 Persimmon Homes position is that the Council need to explore all available sites in the Borough and allocate more land for housing: there are sites that are suitable, available and deliverable that are capable of contributing to the Councils vast unmet housing need. In that sense, the Councils methodology and approach in the Local Plan needs to be thoroughly assessed against its requirements.

- 1.6 Worthing Borough is operating a land supply of approximately 1.3 years, obviously that is significantly below the obligatory (minimum) 5-year requirement specified in the National Planning Policy Framework, published in 2019.
- 1.7 It is against this context and severe housing deficit that the company is promoting the land at Sea Lane, Ferring for either:
- (a) housing on the northern part of the site, and/ or
 - (b) a combined community use (Worthing Rugby Club on the northern part of the site) and open space on the remainder. However, our reservations in relation to the Borough's overall land supply are as follows.

2. The SHLAA's Ethos on Provision of a Range of Sites

- 2.1 In the Council's SHLAA, Paragraph 3.5 states that:

*"Plan makers should be proactive in identifying as **wide a range** as possible of sites and broad locations for development".*

- 2.2 Paragraph 3.6 goes on to say that:

"The role of SHLAA is to ensure that local planning authorities have a robust understanding of the amount of land with potential for housing within their area".

- 2.3 The LPA's recognition of the need for identification of a wide range of sites is welcomed – and we take that to mean variation in development opportunities. That is a matter of concern – because (and setting aside the huge deficit) the emerging Local Plan leans hugely towards apartment block provision and not family housing. Surprisingly, out of the 1,753 units allocated in the Local Plan, approximately 1,260 units are to be apartments (in the urban area sites alone). In other words, approximately 72% of the identified dwelling numbers are apartments – hardly consistent with the corner-stone aim of the SHLAA for **a wide range of housing**.
- 2.4 Moreover, apartment schemes bring with them a host of viability, deliverability and occupier -issues, especially in the current poor economic climate. By occupier-issues we mean greater demands for internal space, allowing working from homes, and the need for households to have their own private outside amenity space. Flats do not facilitate the profound changing demands of the consumer. In short, there is a need for houses and not flats.
- 2.5 The corollary of that focus is that the land-sieve cannot be exclusionary: the Plan's insistence on non-examination of local green space designations is inimical to satisfying the Borough's housing needs-remit - and the most sustainable locations for fulfilling new house-building.

3. Fidelity of the Plan's Assumptions

- 3.1 Persimmon Homes is unconvinced about the Local Plan's assumptions on housing numbers and delivery, including the reality of real-world practical problems – there are numerous planning, valuation, acquisition, technical and construction constraints to overcome. Just because a scheme has planning permission does not mean it is deliverable: there may be a host of constraints and obstacles. The key is to be able to determine whether a site can be 'implemented', so a thorough (viability) examination of the Local Plan's list of apartment sites is warranted – as the LPA places its emphasis in that direction.
- 3.2 Forensic scrutiny is particularly important on brownfield sites, where issues such as contamination and viability and protracted lead-in times come into play – these can seriously undermine annual delivery targets. Therefore, it is fundamental to source housing opportunities from a range of sites, including brownfield and greenfield sites.
- 3.3 An added issue is Persimmon Homes' recent industry-based experience in implementation. We find that development-yield is being lowered by an array of applied policy requirements – including highways and parking standards, nationally described space standards, M4(2) and M4(3) compliance, design aspirations, and open space requirements.
- 3.4 This is not to say that Persimmon is opposed to these considerations/ design requirements. The point has to be made that design factors will reduce the overall unit yield from schemes, and the Local Plan should weigh in on the lower end of the yield scale. And that reasoned interpretation has to, in turn, feed through to the Land Supply equation.
- 3.5 Accuracy on the numbers must then be matched by realism in implementation rates. Persimmon's experience on the key milestones are as follows:
- The average time for a Reserved Matters approval is 24 months;
 - On a housing site, the average time from site start to the first completion is 9 months, depending on the complexity of the site;
 - On an apartment scheme, completion timeframes will vary, depending on the scale and complexity of the project, but, crucially, occupations cannot occur until the whole block (of flats) is completed.
- 3.6 At this point cross reference to the NPPF is salient. Paragraph 3.40 sets out that sites will be categorised as deliverable if there is a reasonable prospect of them being delivered within 5 years - as per the NPPF definition. It is important to reiterate here that the definition of "deliverable" has changed. The **new definition** as set out in Annex 2: Glossary of NPPF2 now reads as follows:

"Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a) Sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until**

permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have term phasing plans).

- b) Where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, **it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years...**"

- 3.7 The text change is significant and has implications for how Local Planning Authority's calculates its housing land supply. The new definition confirms that major sites, that are subject to outline planning permissions or allocations, should ***not be considered deliverable unless there is clear evidence that completions will be achieved within five-years.***
- 3.8 Our understanding is that the Council fully recognise that their obligation is to provide a deliverable 5-year supply of land. But the process then becomes flawed and corrupted – because the Local Plan only allocates just 25.6% of their 5-year housing land requirement and of these, approximately 72% is allocated in apartment schemes.
- 3.9 This *pushing the deficit and problem* into the future is an abrogation of the Council's responsibility, as a local planning authority, to follow the advice of the NPPF.

4. The Present Local Plan Delivery Ethos is Untenable

- 4.1 In terms of the fore-going, Worthing Brough Council, therefore, needs to fully consider the suitability, availability and deliverability of all potential sites to correct the deep land supply deficit. The enormous size of the shortfall, at 10,488 dwellings, means that a fresh start is vital; the Local Plan needs to be overhauled in its fundamentals.
- 4.2 As a first principle, the land-trawling process must then deploy the central tenet of the National Framework, expressed as follows:

"Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- a) **An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;**
- b) **A social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built**

- environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and**
- c) An environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”**

- 4.3 Therefore, the fulfilment of the Borough Council's new housing obligations should be on proposals that are sustainable, in the manner of the above national planning criteria.
- 4.4 Having reviewed the Council's housing numbers' deficit, the Plan's methodology, and the insupportable reliance on building a disproportionate number of new flats, rather than houses, we turn to our attention to the potential of land at Sea Lane, Ferring. In flagging up that site, we examine the shortcomings in the Borough's spatial strategy.

5. Objection to Policy SS5 and Policy SS6

- 5.1 As noted above, the starting point for the Draft Plan (should be) in fulfilling inter-alia, local housing needs. That means paying regard to Worthing's Objectively Assessed Need... and beyond that remit, the spatial strategy should be biased towards large site releases – as being the best opportunity to secure meaningful numbers of affordable dwellings.
- 5.2 Our first criticism is that the Spatial Strategy is inadequate - since it fails to reflect the ability/inability of neighbouring LPA's to assist in satisfying new housing needs - as set out in paragraph 26 of the NPPF, and the requirement to address cross-boundary issues. Although some engagement has taken place between the relevant bodies, it is clear that the Duty to Cooperate has not been met.
- 5.3 The plan does not provide a solution to the vast unmet housing need that is required (a) within Worthing Borough, or (b) within adjoining authorities. In that sense, the plan does not make adequate provision and has failed in its Duty to Cooperate. Paragraph 3.28 indicates the Council has been working with other local authorities across the sub-region but is not clear how the unmet need has been addressed, or for that matter realised.
- 5.4 Furthermore, as a large portion of the Borough is in the National Park the remaining non-urban land needs to be seen primarily through the prism of a resource asset, to be assessed against the LPA's indigenous development needs. It follows that the plan-making process should not commence with newly-placed obstacles – that is the insertion/ designation of Local Gap of Green Space designations.
- 5.5 The context for that criticism is stark. There is an unmet need for 10,488 new homes by 2036 and some 24.1% of the land in Borough is within National Park. Persimmon Homes' assertion is that the Local Plan is flawed in designating (further) park-like opportunities elsewhere.

- 5.6 Accordingly, Persimmon object to (i) **Policy SS5 – Local Green Gaps** and **Policy SS6 – Local Green Space** and (ii) more specifically, the designation of Manor Farm (the Goring-Ferring Gap) in this Draft Plan as a Local Gap/ Local Green Space. Both the policy instrument and the site designation are unsound.
- 5.7 Manor Farm is private agricultural land, with no public access; and it does not perform a discernible Local Green Gap function. In summary, we object to Persimmon’s land at Manor Farm being so designated - especially as the Local Plan is unable to satisfy its indigenous development needs and the Borough benefits hugely in open space resources through the National Park and through the sea-side resource along its southern flank.

6. Manor Farm, Sea Lane, Ferring: A Suitable Development Site

- 6.1 As noted above, Worthing Borough Council does not possess sufficient land for accommodating current and future growth – hence, the permanent restriction of development occupying Manor Farm is unsound.
- 6.2 Persimmon Homes’ (owned) land at Manor Farm, Sea lane, is shown in the Appendix: it is a substantial tract of private agricultural land, with existing development on three sides. The subject site is split between two administrative areas: Arun District and Worthing Borough. This is important, because there is an opportunity for both authorities to work together in their Duty to Cooperate, to assist one another in meeting their respective housing shortfalls.
- 6.3 Persimmon assert that the site has potential for accommodating two uses: (1) housing confined to the northern part of the overall site, together with the open space and a nature reserve on the balance of the land... or (2) the northern part of the site to be conveyed to Worthing Rugby Club, with the balance of the site to be used as open space.
- 6.4 What is presented here is a logical and comprehensive solution with two strands. The first of which being if the land were to facilitate the relocation of the Rugby Club (the current site in Arun District is allocated for housing, subject to a relocation site being found) it would unlock housing land in a situation where neighbouring authorities should be working together to overcome such practical delivery issues.
- 6.5 The second strand is the vital need to contribute towards satisfying Worthing Borough Council’s development obligations – presently suffering a 10,488-unit shortfall.
- 6.6 That is the context for this formal objection to the Local Plan. Correspondingly, we urge that the permanent designation of Manor Farm as a Local Green Gap is both inappropriate and unsound.

7. Concluding Comments

- 7.1 The fundamental point of these representations is that here is a schism in the Council's forward-planning function. On the one hand, Worthing Borough Council fully recognise that sufficient land is required to meet its 5-year housing land supply. But, on the other hand, that central ethos, which is part and parcel of the NPPF, has been denied in the Council's Regulation 19 Local Plan.
- 7.2 It is unconscionable that an obligation of 14,160 new homes has been addressed by site allocations intended to deliver only 3,672 homes. This is a monumental deficit which must be remedied through site allocations based on the sustainability precepts of the National Framework. Other than statutorily-protected land, every opportunity needs to be considered fairly and openly. This imperative is buttressed by the deficit not having been cut by cross-authority remedies.
- 7.3 Our allied criticism is that placing huge reliance on sites for apartment building denies the precepts of the national guidance on site allocations / site type. And we have raised the potential for such sites to be delayed/ to be unviable/ to make only a small contribution to affordable housing. More greenfield sites are needed in the Plan to meet the indigenous housing need.
- 7.4 It is in this context, that the allocation of part of the land at Sea Lane, Worthing is put forward as a deliverable site for either (a) housing and open space or (b) the relocation site for Worthing Rugby Club, alongside open space. The precursor to these objectives is removal of the restrictions of both Policy SS5 and SS6.
- 7.5 These are twin obstacles, preventing the necessary recognition that Worthing B.C. is in no position to exclude viable greenfield sites from development – not least when the Borough is resource-rich in having both the National Park and its sea-side open spaces.
- 7.6 The overhanging deficit of 10,488 homes makes it profoundly unsound to introduce local greenspace/ local gap designations at this stage.
-

Persimmon Homes, March, 2021

APPENDICES

Appendix 1: The subject site (Manor Farm, Ferring) in its wider context





Ian Moody
Planning Policy Team
Worthing Borough Council
Portland House
44 Richmond Road
Worthing
BN11 1HS

If calling please ask for: **Toby Ayling**
23 March 2021
Our ref:
Your ref:

Dear Ian

Worthing Local Plan Consultation (Regulation 19)

Thank you for consulting Chichester District Council (CDC) on the Regulation 19 Worthing Draft Local Plan, published 26 January 2021.

Chichester District Council provided comments on the Regulation 18 Worthing Draft Local Plan in December 2018. As a partner authority in the West Sussex and Greater Brighton Strategic Planning Board, we welcome the continued recognition given to the ongoing work of the Board in addressing cross-boundary and sub-regional matters to ensure that the strategic development and infrastructure needs of the overall area are met as far as possible within the context of the provision of the National Planning Policy Framework (NPPF).

We note that our previous comment regarding the plan period has been addressed and that the plan period has been extended to 2036, in accordance with NPPF requirements.

The Submission Draft Local Plan states at paragraph 1.45 that,

“Although the Council will work positively to deliver growth, there is no expectation that all needs (particularly housing) can be met within the borough. Therefore, it will be imperative that the Council continues to work with neighbouring authorities and partners through the Duty to Cooperate to explore all options on whether there is any ability for other areas to deliver some of Worthing development needs, and how this might be achieved”.

The Local Plan identifies a housing need is identified as 885 dwellings per annum. Taking into account housing supply from all sources, the Local Plan sets an annual minimum target of 230 dwellings per annum. This is significantly below the housing need figure and means that there will be a shortfall of 10,488 dwellings over the plan period.

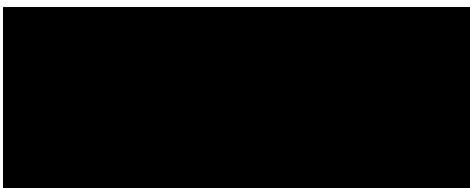
Chichester District Council raised concerns about the significant shortfall in their response to the Regulation 18 consultation and asked that,

“Given the potential effect of this strategy, we would encourage Worthing Borough Council to further investigate all potential opportunities to increase housing provision within its plan area. This includes ensuring that no stone is left unturned by the Council in maximising the potential of the existing urban areas to regenerate and be intensified, where appropriate to do so.”

The Regulation 19 Worthing Draft Local Plan does not identify sufficient sites to meet housing need, with the annualised target now being slightly lower than that proposed in the Regulation 18 Draft Local Plan. The extent to which this is the maximum which can be sustainably delivered will be tested through the forthcoming Examination into the Worthing Local Plan, though in general terms the constraints, and in particular the scarcity of land, are recognised and understood.

CDC will continue to engage constructively, actively and on an ongoing basis with other local authorities and organisations to address sub-regional issues. We look forward to a continued working relationship with you and the other members of the West Sussex and Greater Brighton Strategic Planning Board in addressing cross-boundary and sub-regional matters.

Yours sincerely



Toby Ayling
Divisional Manager Planning Policy

Submission Draft Worthing Local Plan Consultation (Regulation 19 version) is published for consultation

1 message

Bowie, David <David.Bowie@highwaysengland.co.uk>

23 March 2021 at 17:08

To: "planning.policy@adur-worthing.gov.uk" <planning.policy@adur-worthing.gov.uk>

Cc: "tracy.wigzell@adur-worthing.gov.uk" <tracy.wigzell@adur-worthing.gov.uk>, Planning SE

<planningse@highwaysengland.co.uk>, "Franklin, Richard" <Richard.Franklin@highwaysengland.co.uk>, "Cleaver,

Elizabeth" <Elizabeth.Cleaver@highwaysengland.co.uk>, "Bown, Kevin" <Kevin.Bown@highwaysengland.co.uk>,

"WALKDEN, NIGEL" <Nigel.Walkden@highwaysengland.co.uk>

Dear Sirs,

Submission Draft Worthing Local Plan Consultation (Regulation 19 version) is published for consultation

Thank you for your consultation of the 26th January regarding the Draft Worthing Local Plan Consultation (Regulation 19 version) seeking Highways England's comments by 23rd January.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. Highways England will be concerned with plans and/or proposals that have the potential to impact on the safe and efficient operation of the SRN. In the case of the Worthing Local Plan our focus will be on any potential impact to the A27 Trunk Road.

Highways England continue to work with officers from Adur-Worthing, their consultants WSP and West Sussex County Council to agree the Transport Study supporting the Local Plan. Whilst good progress has been made there is still further work to be undertaken before Highways England can agree that the plan is sound in relation to its potential impacts on the safe and efficient operation of the A27 Trunk Road. The modelling has shown that although the councils housing proposals are quite modest in comparison to others there is still a detrimental traffic impact to the operation of the A27. It has been agreed that consultants WSP will undertake some additional work on the indicative cost of the Offington Roundabout Mitigation Scheme and to cost the other sustainable transport measures set out in the Transport Study. This will need to be undertaken to demonstrate that the necessary schemes are affordable within the overall development context.

We agree with the councils strategy to minimise car trips from development by encouraging more sustainable forms of travel which have significantly less impacts on the operation of the road network. However, securing a modal shift away from the private car is not straight forward and not guaranteed. Accordingly, there will need to be a fall back position which would necessitate highway improvements in the event that the modal shift is not secured. We agree therefore that it

may be more effective to look at a blended approach whereby the council seek contributions to pay for the Offington Roundabout Improvement scheme for example, together with a package of other sustainable transport measures rather than relying solely on sustainable transport improvements to reduce the impact of development traffic.

It will also be necessary for the council to consider how it will deal with windfall development outside of the Local Plan as this adds to the cumulative impacts on the highway network both local and strategic. The Transport modelling takes into account the current housing target and mitigation is based upon this at 'Nil' detriment. Accordingly anything beyond this will likely remove the approved mitigations capacity to cater for the traffic generated by planned development. Whilst all planning applications should be supported by Transport Statements / Assessments there may be a need to consider policy for contributions to be collected towards further mitigation/sustainable transport initiatives from even small scale development (10+ dwellings).

Finally we recommend developing a Statement of Common Ground on highways matters between ourselves, the council and West Sussex County Council prior to submission of the Local Plan Examination in the Summer. The Statement can be drafted as soon as practicable and can be amended as more matters are agreed between us.

I trust that the above comments are of assistance.

Thank you for consulting Highways England and if you have any queries regarding our response, please contact us at PlanningSE@highwaysengland.co.uk.

Kind regards,

David

David Bowie

Area 4 Spatial Planning Manager (Acting)

Tel: +44 (0) 7900 056130

Highways England | Bridge House | [1 Walnut Tree Close](#) | Guildford | Surrey | GU1 4LZ
Web: <http://www.highwaysengland.co.uk>

Please note that for the foreseeable future we are all working from home. All meetings will be via telephone, Skype or similar. We will continue to seek to work to our statutory and other deadlines. In case of IT or other issues, as a precaution, please copy all emails to PlanningSE@highwaysengland.co.uk . Thank you.

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Highways England Company Limited | **General enquiries: 0300 123 5000** | **National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF** | <https://www.gov.uk/government/organisations/highways-england> | info@highwaysengland.co.uk

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Consider the environment. Please don't print this e-mail unless you really need to.

23 March 2021

Worthing Borough Council
Planning Policy
Portland House
44 Richmond Rd
Worthing
BN11 1HS

By email only

Dear Ian,

SDNPA representation to the Submission Draft Worthing Local Plan 2016-2033 Regulation 19 consultation and response to the Duty to Co-operate letter from James Appleton, Head of Planning and Development, Worthing Borough Council to Tim Slaney, Head of Planning, SDNPA dated 29 January 2021

Thank you for consulting the South Downs National Park Authority (SDNPA) on the Submission Draft Worthing Local Plan. This letter also responds to the Duty to Co-operate letter sent on 29 January 2021 to Tim Slaney, Head of Planning, SDNPA from James Appleton, Head of Planning & Development for Worthing Borough Council.

The SDNPA acknowledges the challenges faced by Worthing Borough Council (WBC) in meeting housing need and the process to produce the Submission Draft Worthing Local Plan having robustly, exhaustively and positively sought to find sites suitable for development. The SDNPA appreciates and understands the constraints the Council faces in finding suitable sites. As stated in James Appleton's letter officers from the SDNPA and WBC have liaised throughout the preparation of the Worthing Local Plan (WLP) and the comments below on specific sites reflect that joint working. The Planning Inspector for the South Downs Local Plan, adopted in July 2019, acknowledged the priority given to the two purposes of the National Park and considered that the approach taken and level of development were suitable for this protected landscape. The SDNPA confirms that given the constraints of the National Park as a protected landscape and the levels of development in the adopted South Downs Local Plan, there is no scope to deliver Worthing's unmet housing need. However, the SDNPA will continue to work closely with WBC in developing the WLP both bilaterally and through the West Sussex and Greater Brighton Partnership.

The SDNPA and all relevant authorities are required to have regard to the purposes of the South Downs National Park (SDNP) as set out in Section 62 of the Environment Act 1995. The purposes are 'to conserve and enhance the natural beauty, wildlife and cultural heritage of the area' and 'to promote opportunities for the understanding and enjoyment of the special qualities of the national park by the public.'

Please also note the Government's proposed changes (underlined below) to the NPPF paragraph 175 on National Parks, namely "The scale and extent of development within these

designated areas should be limited, while any development within their settings should be sensitively located and designed to avoid adverse impacts on the designated landscape.”

Duty to Cooperate

The SDNPA has a set of six strategic cross-boundary priorities. I would like to take the opportunity to again highlight these, which provide a framework for ongoing Duty to Cooperate discussions:

- Conserving and enhancing the natural beauty of the area.
- Conserving and enhancing the region’s biodiversity (including green infrastructure issues).
- The delivery of new homes, including affordable homes and pitches for Gypsies, Travellers and Travelling Showpeople.
- The promotion of sustainable tourism.
- Development of the local economy.
- Improving the efficiency of transport networks by enhancing the proportion of travel by sustainable modes and promoting policies, which reduce the need to travel.

SS4 (previously SP4): Countryside and Undeveloped Coast

The SDNPA reiterates the support for, in particular part f) of this policy, on the setting of the SDNP, respecting the Designated International Dark Skies reserve and improving access to the National Park. SDNPA again reiterates its commitment to the Council in working in partnership on these issues to ensure residents benefit from the special qualities of the National Park.

The SDNPA suggests consideration be given to amending the policy wording in the light of the proposed changes to paragraph 175 of the NPPF in relation to development within the setting of a National Park.

SS5 (previously SP5): Local Green Gaps and SS6 (previously SP6): Local Green Space

The SDNPA reiterates comments made at the Regulation 18 consultation (note updated Landscape Character Assessment webpage link). South Downs Landscape Character Assessment (LCA) 2020, Appendix B, Landscape Type B: Wooded Estate Downland and B4: Angmering and Clapham Wooded Estate Downland. <https://www.southdowns.gov.uk/wp-content/uploads/2020/10/South-Downs-Appendix-B-Wooded-Estate-Downland.pdf>

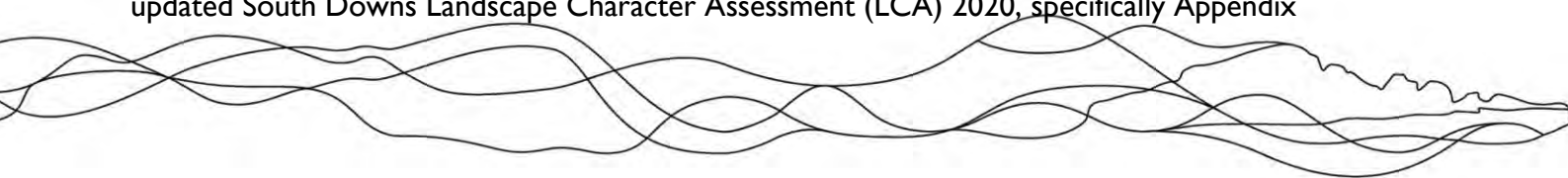
DM15 Sustainable Transport & Active Travel (previously CP24: Transport)

The SDNPA reiterates the support for, in particular part b) iii), the development of improved access across the A27 and better connectivity with the South Downs National Park from the Borough in partnership with West Sussex County Council and relevant agencies including the SDNPA.

Site Allocations

AI Beeches Avenue (previously Omission sites, OS2: Land North of Beeches Avenue and OS3: Worthing United FC)

Notwithstanding the comments at Regulation 18 stage, the SDNPA welcomes and supports the Development Requirements, in particular points a), b), d) and e). The comments about the design being led by landscape character are reiterated, including the reference to the updated South Downs Landscape Character Assessment (LCA) 2020, specifically Appendix



A, Landscape Character Type A: Open Downland and A3: Arun to Adur Open Downs, <https://www.southdowns.gov.uk/wp-content/uploads/2020/10/South-Downs-Appendix-A-Open-Downland.pdf>

A2 Caravan Club, Titnore Way (previously A1: Caravan Club)

The SDNPA's comments at Regulation 18 for this site a.

A13 Titnore Lane (previously Omission site OSI: Land East of Titnore Lane)

The SDNPA's comments regarding this site at Regulation 18 stage are reiterated.

However, if future development were to be brought forward at this site, the SDNPA would welcome and support the Development Requirements, in particular points b) and e).

The SDNPA suggests: in point a) reference is also made to the document Roads in the South Downs, due to the close proximity and setting of the SDNP, for any access onto Titnore Lane; in point e) additional wording is used to emphasise that any new green corridors "are of sufficient nature and scale to be effective routes for wildlife".

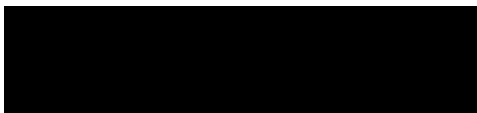
It is suggested any future proposals for the site use a landscape led approach with reference to the updated South Downs Landscape Character Assessment (LCA) 2020, specifically Appendix B, Landscape Character Type B: Wooded Estate Downland B4: Angmering and Clapham Wooded Estate Downland, <https://www.southdowns.gov.uk/wp-content/uploads/2020/10/South-Downs-Appendix-B-Wooded-Estate-Downland.pdf>

A15 Upper Brighton Road (previously A3: Land at Upper Brighton Road)

Notwithstanding comments made at Regulation 18 for this site, the SDNPA welcomes and supports, in particular, the Development Requirements point b) and d), in relation to reinforcing existing hedgerow boundaries and the integration of trees to mitigate visual impact from the SDNP respectively.

SDNPA suggests proposals for this site use a landscape led approach with reference to the updated South Downs Landscape Character Assessment (LCA) 2020, specifically Appendix A, Landscape Character Type A: Open Downland, A3: Arun to Adur Open Downs <https://www.southdowns.gov.uk/wp-content/uploads/2020/10/South-Downs-Appendix-A-Open-Downland.pdf>

Yours sincerely,



Lucy Howard
Planning Policy Manager
E: lucy.howard@southdowns.gov.uk
T: 01730 819284

Local plan for Worthing

1 message

Amy Dissanayake

To: planning.policy@adur-worthing.gov.uk

23 March 2021 at 18:44

Dear Sir/Madam,

I would like to formally register my concerns regarding the plan for the gas works site on lyndhurst road detailed on page 88.

In summary, I am extremely worried regarding the scale of the planned development and the impact on the surrounding housing and infrastructure. I do not believe this is proportionate or in keeping with the local area. There will be considerable loss of light to the surrounding properties and huge increase in traffic (with no parking facilities) and therefore a significant impact on health of local residents.

The proposal feels a greedy approach to what could be a positive development to support local family housing. Please see more detailed response below.

Kind regards

Amy Dissanayake

Please use a separate sheet for each representation

To which part of the Submission Draft Local Plan does this representation relate?

Policy

A9

Paragraph

4.29/4.30

Map Ex
tract

N/R

Do you consider the Submission Draft Local Plan:

Legally compliant?

Yes

X

No

Don't know

Sound?

Yes

No

Don't know

**Complies with the Duty
to Cooperate?**

Yes

X

No

Don't know

Please give details of why you consider the Submission Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Submission Draft Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Although I support the principle of development on this site for much needed family housing and in particular the policy requirement to 'address contamination issues' and to provide 'high quality residential', the Policy is not sound. This is because I do not believe the indicative capacity has taken into account the constraints of the site. I believe that a development at the density proposed cannot be achieved whilst still meeting the other policy

requirements set out in the Plan including DM1 and DM2 and therefore the current allocation is undeliverable.

Reasons for objection

1. The site cannot deliver the capacity of homes identified. The Regulation 18 version of this Plan indicated a capacity of 85 town houses and flats. In order to achieve the new indicative number of 150 units it is highly likely that any future redevelopment scheme would only comprise a flatted development. Indeed, it is interesting to note that the developer is currently consulting on a proposal for 210 one-bedroom flats over 9 storeys with 0.6 parking spaces per flat on this site. They propose to submit the planning application in March 2021. The pre-application proposals are helpful in that they clearly illustrate that in order to achieve high densities only one bed units are likely to be delivered. It has therefore not been clearly demonstrated that this site can accommodate the anticipated number of units and still be in accordance with your housing mix policy DM1 and your SHMA which identifies that the most significant need in Worthing is for 2/3 bed housing. Although Para 5.8 of the Plan indicates that whilst higher density flatted schemes are more likely to deliver smaller properties, it still stresses that they "should also include a proportion of larger units with 3 or more bedrooms". Policy DM1 requires schemes to 'deliver sustainable, mixed and balanced communities'. The current allocation at the densities proposed will not be able to meet other policy requirements and is therefore undeliverable.

2. I acknowledge that development proposals must make the most efficient use of land and I support Policy DM2 - Density. I support the fact that Policy DM2 makes clear that the capacity of any site must be based on a design led approach which consider the site context and character. The site constraints of A9 need to be recognised, particularly in respect of the need to be cognisant of the character of the nearby Conservation Areas and Beach House Park to the east. The proposed allocation does not fully recognise the nature of the road network around the site. Park Road is one way and very narrow, Lyndhurst Road is heavily constraint and highly residential in this location. It is a very busy road and is the main road to the A&E hospital. In view of these constraints I do not believe that the Proposed Allocation for A9 can deliver the indicative capacity without having a dramatic negative impact on the character of the area. It is therefore undeliverable.

3. The capacity of the site will also be dependent on the amount of parking proposed. The pre-application scheme clearly illustrates that the site could not deliver the number of units and the necessary levels of parking. The CPZ is currently oversubscribed and this will be exacerbated by the loss of hospital parking from this site. There needs to be an increased emphasis on the need for the proposals to provide either onsite parking to meet the need generated by the development or onsite measures to encourage sustainable transport and offsite contributions.

(continue on a separate sheet/expand box if necessary)

Please set out what modification(s) you consider necessary to make the Submission Draft Local Plan legally compliant or sound, having regard to the matter you have identified above where this relates to soundness. You will need to say why this modification will make the Submission Draft Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

1. The indicative number of units on the site needs to be reduced. This proposed modification is justified on the grounds that the higher indicative capacities are undeliverable.
2. Paras 4.29 and 4.30, which set out the site description need to be clear about heritage and local character constraints. This proposed modification is justified on the grounds that it would bring the proposed Allocation A9 in line with the requirements of Policy DM2.
3. There is an inconsistency in how development requirements are expressed for this site allocations. I note that Site A10 requires the development proposals to “not have an unacceptable impact on the amenity of neighbouring residents” and Site A11 requires any redevelopment to “be sensitive to the surrounding Conservation Areas etc”. Similar requirements should be included in the list of development requirements for Site A9 and should include the following:
 - protection the character of the existing area, which is predominately low rise, family housing;
 - consideration of the two adjacent conservation areas at Warwick Gardens and Little High Street;
 - the requirement for a mix of homes that take account of the character of the area and the existing built environment and to properly address local housing need.
4. The requirement of 1 parking space per unit given the huge demand for parking in the area. Alternatively, the policy must emphasise the need for the proposals to provide onsite measures to encourage sustainable transport and provide offsite contributions
5. The photograph in the draft Local Plan needs to be replaced with an up to date picture. The gas holder was removed many years ago.

(continue on a separate sheet/expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes

NO

Yes

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

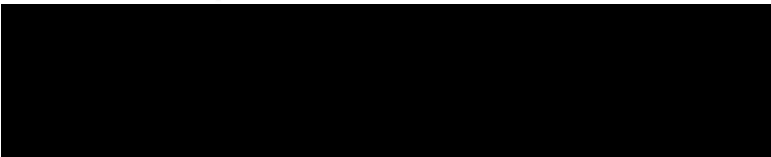
I believe the developer/promoter of the site will seek an even higher density than the proposed indicative amount in the draft plan of 150 units. They will argue that the 'abnormal' cost of decontamination will require higher densities to make the development viable. They will also argue that the height of the gas holder justifies nine storeys. Many people have moved into the area since the holder was removed many years ago. I do not think the density levels should be increased.
Given the location of the site, on the edge of the town centre with predominately family housing surrounding it, already constrained roads and parking, close to the hospital, I believe the site should provide a mix of homes, Furthermore, proper consideration should be given to the provision of onsite parking and/or the provision of onsite measures to encourage sustainable transport.

Please note: The inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

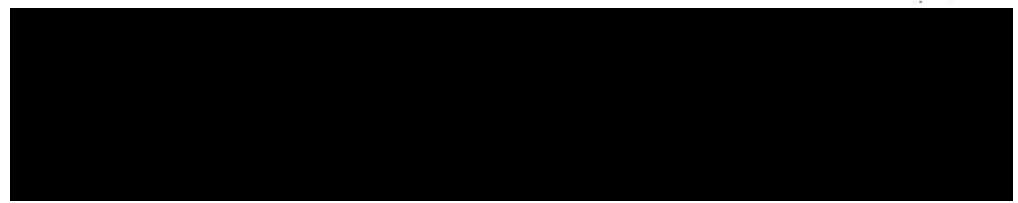
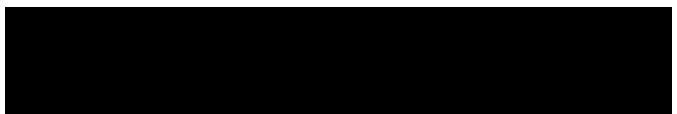
Darren Sole & Mark Newell



Please add our details to the
list of objectors, for the new
development.

Thanks for your efforts!

Dinner table of Mark Hensell



Michelle

list of objects for the new

development

Thanks for your efforts!

Just add a sheet with your name and address/email. Anonymous submissions will not count.

To which part of the Submission Draft Local Plan does this representation relate?

Policy Paragraph Map Extract

Do you consider the Submission Draft Local Plan:

Legally compliant?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
	Don't know	<input type="checkbox"/>		
Sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
	Don't know	<input type="checkbox"/>		
Complies with the Duty to Cooperate?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
	Don't know	<input type="checkbox"/>		

Please give details of why you consider the Submission Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Submission Draft Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

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Reasons for objection

1. The site cannot deliver the capacity of homes identified. The Regulation 18 version of this Plan indicated a capacity of 85 town houses and flats. In order to achieve the new indicative number of 150 units it is highly likely that any future redevelopment scheme would only comprise a flatted development. Indeed, it is interesting to note that the developer is currently consulting on a proposal for 210 one-bedroom flats over 9 storeys with 0.6 parking spaces per flat on this site. They propose to submit the planning application in March 2021. The pre-application proposals are helpful in that they clearly illustrate that in order to achieve high densities only one bed units are likely to be delivered. It has therefore not been clearly demonstrated that this site can accommodate the anticipated number of units and still be in accordance with your housing mix policy DM1 and your SHMA which identifies that the most significant need in Worthing is for 2/3 bed housing. Although Para 5.8 of the Plan indicates that whilst higher density flatted schemes are more likely to deliver smaller properties, it still stresses that they "should also include a proportion of larger units with 3 or more bedrooms". Policy DM1 requires schemes to 'deliver sustainable, mixed and

balanced communities". The current allocation at the densities proposed will not be able to meet other policy requirements and is therefore undeliverable.

2. I acknowledge that development proposals must make the most efficient use of land and I support Policy DM2 - Density. I support the fact that Policy DM2 makes clear that the capacity of any site must be based on a design led approach which consider the site context and character. The site constraints of A9 need to be recognised, particularly in respect of the need to be cognisant of the character of the nearby Conservation Areas and Beach House Park to the east. The proposed allocation does not fully recognise the nature of the road network around the site. Park Road is one way and very narrow, Lyndhurst Road is heavily constraint and highly residential in this location. It is a very busy road and is the main road to the A&E hospital. In view of these constraints I do not believe that the Proposed Allocation for A9 can deliver the indicative capacity without having a dramatic negative impact on the character of the area. It is therefore undeliverable.
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4. The requirement of 1 parking space per unit given the huge demand for parking in the area. Alternatively, the policy must emphasise the need for the proposals to provide onsite measures to encourage sustainable transport and provide offsite contributions
5. The photograph in the draft Local Plan needs to be replaced with an up to date picture. The gas holder was removed many years ago.

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes

Yes

NO

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Given the location of the site, on the edge of the town centre with predominately family housing surrounding it, already constrained roads and parking, close to the hospital, I believe the site should provide a mix of homes, Furthermore, proper consideration should be given to the provision of onsite parking and/or the provision of onsite measures to encourage sustainable transport.

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Signature:

Date:

16.3.21

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Policy Paragraph Map Extract

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Legally compliant?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
	Don't know	<input type="checkbox"/>		
Sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
	Don't know	<input type="checkbox"/>		
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If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes Yes

NO


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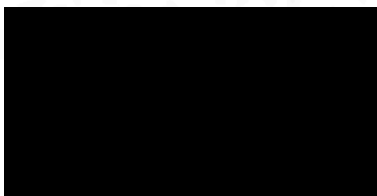
Please note: The inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date:

Donald Brett

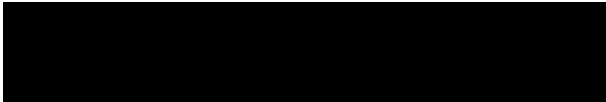


Ref: SDWLP-77

Mr E. Hayward



Email address



Just add a sheet with your name and address/email. Anonymous submissions will not count.

To which part of the Submission Draft Local Plan does this representation relate?

Policy	<input type="text" value="A9"/>	Paragraph	<input type="text" value="4.29/4.30"/>	Map Extract	<input type="text" value="N/R"/>
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Do you consider the Submission Draft Local Plan:

Legally compliant?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
	Don't know	<input type="checkbox"/>		<input type="checkbox"/>
Sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
	Don't know	<input type="checkbox"/>		<input type="checkbox"/>
Complies with the Duty to Cooperate?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
	Don't know	<input type="checkbox"/>		<input type="checkbox"/>

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Signature:



Date:

4th March
2021

Office use Only	
Comment number	SDWLP-78
Date received	

Submission Draft Worthing Local Plan
January 2021

Regulation 19 (Publication Stage) Comments Form

This consultation runs from Tues 26th Jan to Tues 23rd March 2021

How to submit your comments

This response form has two parts:

- Part A: Personal Details
- Part B: Your representation(s)

Both Part A and Part B of the form need to be completed in order for your representation(s) to be valid. Please fill in a separate sheet for each representation (Part B) you wish to make. You do not need to fill out Part A for each representation provided that all representations made are securely attached.

Forms must be returned by the latest
5pm Tuesday 23rd March 2021

You can complete this form on-line: www.adur-worthing.gov.uk/worthing-local-plan

Or return a hard copy of the form:

By post to: Planning Policy Team, Worthing Borough Council,
Portland House, 44 Richmond Road, Worthing, BN11 1HS

Or by e-mail to: planning.policy@adur-worthing.gov.uk

Further guidance

The Local Plan, the evidence base and all supporting documents are published on the Council's website (see link above). This includes a Guidance Note on how to make effective representations and you are advised to read this before making any comments. At this stage (Regulation 19) comments should only relate to whether you consider the Plan complies with legal requirements, including the duty to cooperate, and whether the document is sound.

If you require any advice on completing this form please feel free to contact the Planning Policy Team via email (as above) or telephone on 01273 263000.

You can respond to this consultation online by using the e-form or by email. However, if your preference is to make comments manually this form can be photocopied as many times as necessary.

Part A - Contact Details	
First name	Frances
Last name	ATTARD
Organisation	-
Address line	[REDACTED]
Address line	[REDACTED]
Town	[REDACTED]
Postcode	[REDACTED]
Telephone	[REDACTED]
Email	[REDACTED]

Signed	[REDACTED]	Date	15/3/21
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Note: Unless you request otherwise (by putting a cross in the box to the right), all respondents will be added to the Worthing Local Plan consultee database and will be notified at all subsequent stages of Local Plan progression.	No: please don't add me	<input checked="" type="checkbox"/>
--	-------------------------	-------------------------------------

In addition, if you would like to subscribe to the Worthing Planning Policy Newsletter (which covers a wide range of Planning Policy issues) then please put a cross in this box:	<input type="checkbox"/>
---	--------------------------

<u>Use of information</u>
<p>All data will be stored securely in line with the GDPR. Names and comments we receive will be available for public inspection and may be reported publicly as part of the Local Plan process. However, contact details will not be published. We cannot accept or report confidential or anonymous responses. Further information about how personal information is processed can be found in the Planning Policy Privacy Notice:</p> <p>https://www.adur-worthing.gov.uk/planning-policy/privacy-notice/</p>

Part B
Please use a separate sheet for each representation

To which part of the Submission Draft Local Plan does this representation relate?

Policy

AG

Paragraph

Map
Extract

NIR

Do you consider the Submission Draft Local Plan:

Legally compliant?

Yes

X

No

Don't know

Sound?

Yes

No

X

Don't know

Complies with the Duty to Cooperate?

Yes

X

No

Don't know

Please give details of why you consider the Submission Draft Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Submission Draft Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

As more people are moving out of larger towns I cannot understand how you call 1 Bedroom flats family homes, where is the space coming from? Underground parking? 9 storeys will block light, cause congestion with the one-way traffic down Park Road. Will it over capacitate Worthing Hospital? I do agree that this area could and ~~it~~ is suitable for housing, but must be more sympathetic to the local area.

(continue on a separate sheet/expand box if necessary)

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(continue on a separate sheet/expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

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	Don't know	<input type="checkbox"/>		
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Yes Yes

NO

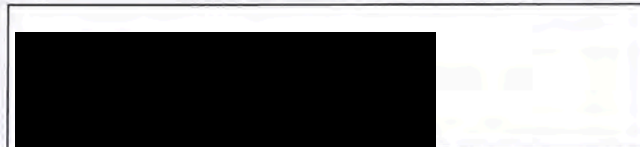
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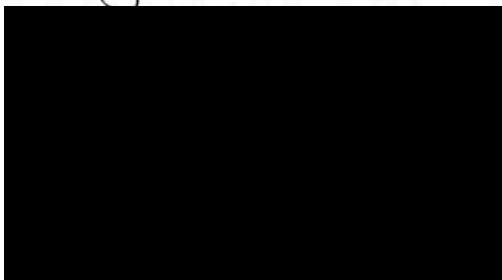
Signature:



Date:

24/2/2021

Ms Jacqui Campbell





SENDER :
KEVIN WOODGATE



THANK
YOU

Just add a sheet with your name and address/email. Anonymous submissions will not count.

To which part of the Submission Draft Local Plan does this representation relate?

Policy	<input type="text" value="A9"/>	Paragraph	<input type="text" value="4.29/4.30"/>	Map Extract	<input type="text" value="N/R"/>
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Legally compliant?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
	Don't know	<input type="checkbox"/>		<input type="checkbox"/>
Sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
	Don't know	<input type="checkbox"/>		<input type="checkbox"/>
Complies with the Duty to Cooperate?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
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SEE BELOW

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To which part of the Submission Draft Local Plan does this representation relate?

Policy

A9

Paragraph

4.29/4.30

Map
Extract

N/R

Do you consider the Submission Draft Local Plan:

Legally compliant?

Yes

X

No

Don't know

Sound?

Yes

No

Don't know

Complies with the Duty to Cooperate?

Yes

X

No

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Signature:


+ Kingshall Residents

Date:

15/3/21

Petition against plans for the former Gas Site.

Berkeley Homes are proposing to build 210 one bed flats over 9 storey with half a parking space per flat.

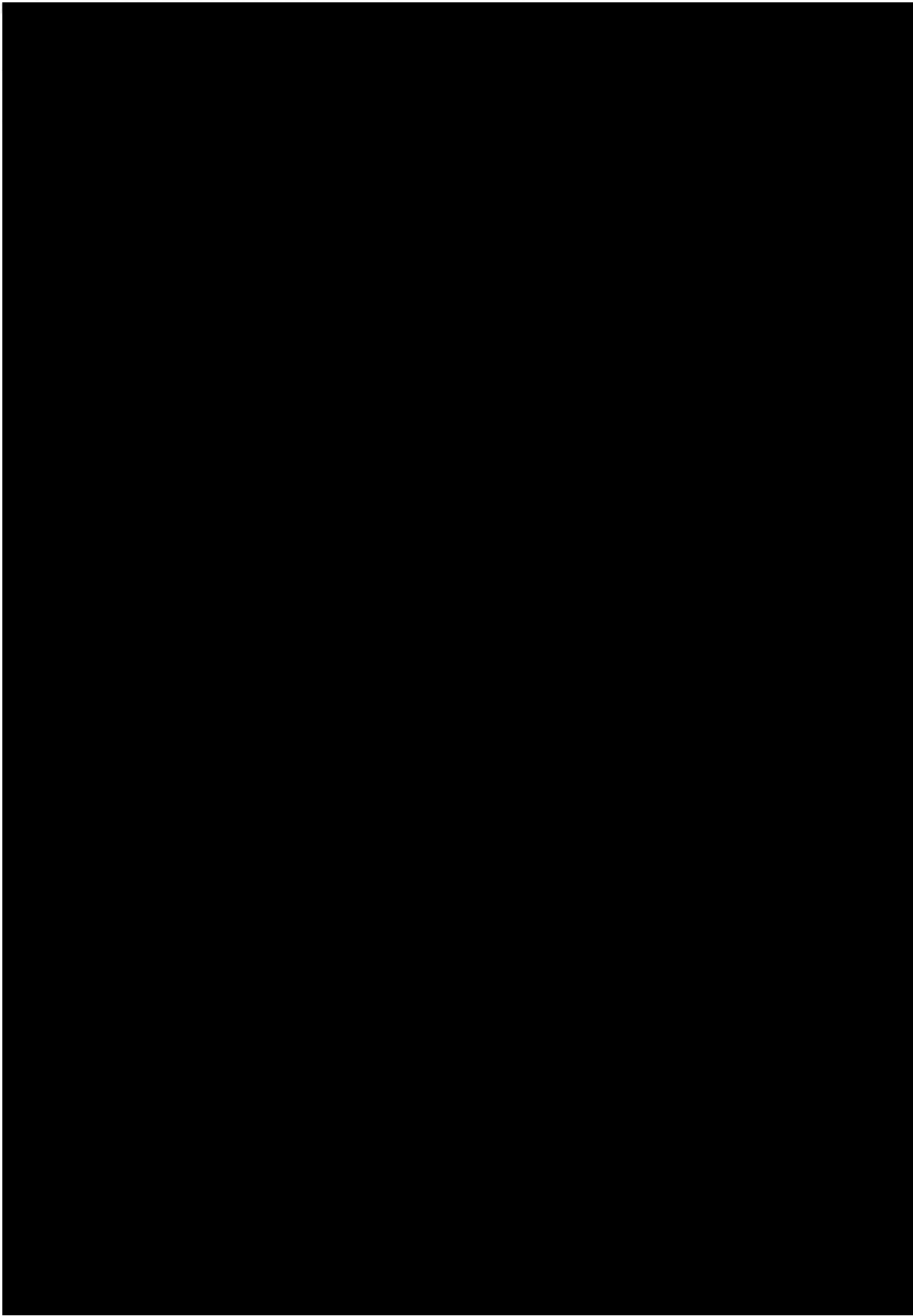
The road network leading to this site is unsuitable , all traffic would need to access from Park Road which is a narrow one way street with character cottages and little to no front gardens. Lyndhurst Road is also very busy in this area with the hospital car parking right opposite Park Road. Street parking is over subscribed in this area and will only increase further with the loss of hospital parking currently on this site. Kingshall is a large retirement complex next door to this site which enjoys views from one side right across the south downs which will inevitably be compromised if high rise building were to

be built there not to mention the privacy that we currently have.

Please take on board our concerns for your next meeting and we welcome any feedback from this.

Kind Regards

**The residents of Kingshall, Park Road,
Worthing.**



Ms Lyn Leggatt
Mr Terence Barlow



25/02/2021

As we live directly across from this development we want to have our say.1/ it will cut out our light. 2/ we will be overlooked 3/,it also is not in keeping with the homes around this development 4/ there is no parking as it is! 5/ they are going to build on contaminated land. 6/ this would be detrimental to our health .7/ the traffic is bad now so what will it be like when the building begins we are against this Development. 8/ we can not move as no one will want our home any more.

9We are in a lock down and the timing of this is all wrong .

Just add a sheet with your name and address/email. Anonymous submissions will not count.

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Policy	<input type="text" value="A9"/>	Paragraph	<input type="text" value="4.29/4.30"/>	Map Extract	<input type="text" value="N/R"/>
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25-2-21

Mr Terence Barlow & Lyn Patricia Leggett

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Signature:

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NB. SEPARATE SHEET ATTACHED WITH OUR CONCERNS & EMAIL ADDRESSES.

AS RESIDENTS OF PARK ROAD, WE HAVE
MANY CONCERNS OVER THE PROPOSED PLANNING
APPLICATION FOR A NINE STOREY BUILD ON
THE FORMER GAS WORKS.

- TO BUILD 210 ONE BED FLATS WITH HALF A
PARKING SPACE WOULD BE DETRIMENTAL TO
THE AREA, BRINGING LOSS OF LIGHT TO
THE SURROUNDING RESIDENTS, NAMELY THE
FISHERMAN'S COTTAGES AND THE RECENT
NEW BUILDS IN LYDZHURST ROAD.

A THREE STOREY BUILD WOULD BE
MORE ACCEPTABLE WITH MIXED
ACCOMMODATION.

- THE PARKING IS ALREADY AN ISSUE
WITH AT LEAST A TEN YEAR WAITING
LIST FOR A SECOND PERMIT.
WHERE IS EVERYONE GOING TO PARK?

- THERE WILL BE CONGESTION OF TRAFFIC
WHICH WILL CREATE A POTENTIAL
ACCIDENT AND NOISE.

• CONTAMINATION

HOW CAN THE GAS CONTAMINATION EVER
SUCCESSFULLY BE CLEARED OUT TO ENSURE
SAFE AND HEALTHY LIVING ON THE
SITE, WHICH AT THE TIME OF
THE REMOVAL OF GAS WORKS WAS
DEEMED UNSAFE FOR HOUSING.

EG. FLATS BUILT ON THE LENOX & PUT
SITE, PREVIOUSLY A PARADE RESULTED
IN HEALTH PROBLEMS & PLANTS DYING.

WE HOPE THE VOICES OF THE PUBLIC
ARE HEARD.

LIZ CURCHER - EMAIL [REDACTED]
MARK TARRER - EMAIL [REDACTED]

RESIDENCE - [REDACTED]

Just add a sheet with your name and address/email. Anonymous submissions will not count.

To which part of the Submission Draft Local Plan does this representation relate?

Policy Paragraph Map Extract

Do you consider the Submission Draft Local Plan:

Legally compliant?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
	Don't know	<input type="checkbox"/>		<input type="checkbox"/>
Sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
	Don't know	<input type="checkbox"/>		<input type="checkbox"/>
Complies with the Duty to Cooperate?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
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Yes

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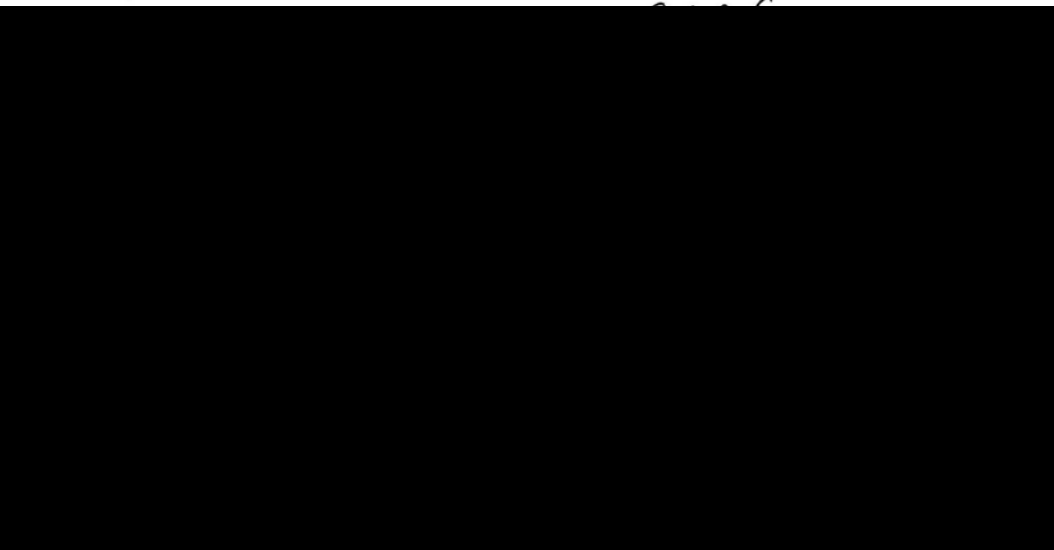
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Signature:



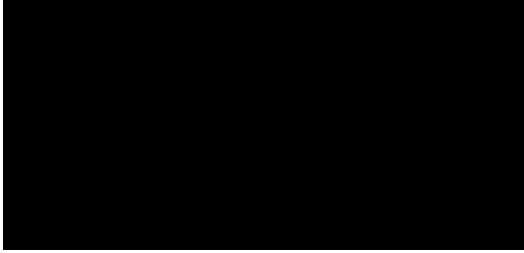
Date:

MICHELLE PRESTON



Ref: SDWLP-85

Michael Bone



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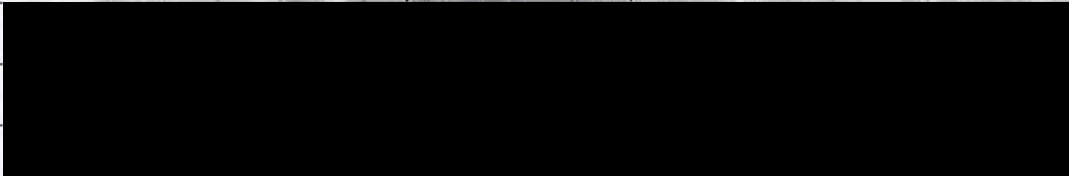
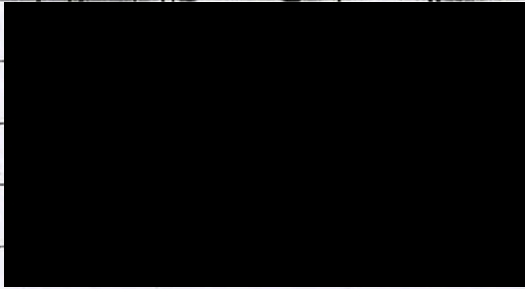
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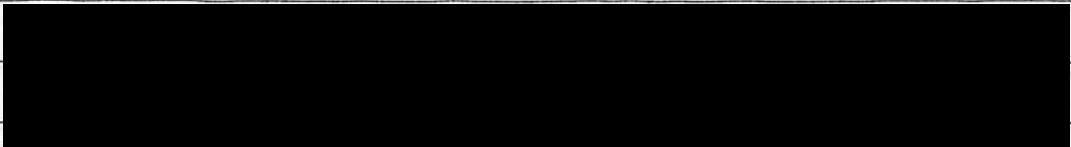
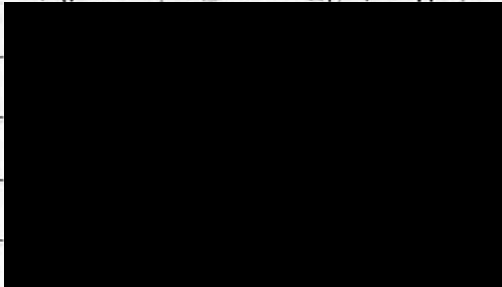
Signature:

Date:

Mr Mrs D.P. MARCHANT



Mr. M. J. ...



Just add a sheet with your name and address/email. Anonymous submissions will not count.

To which part of the Submission Draft Local Plan does this representation relate?

Policy	<input type="text" value="A9"/>	Paragraph	<input type="text" value="4.29/4.30"/>	Map Extract	<input type="text" value="N/R"/>
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Signature:

Date:

14/3/21

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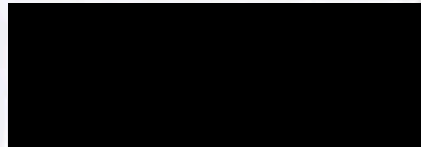
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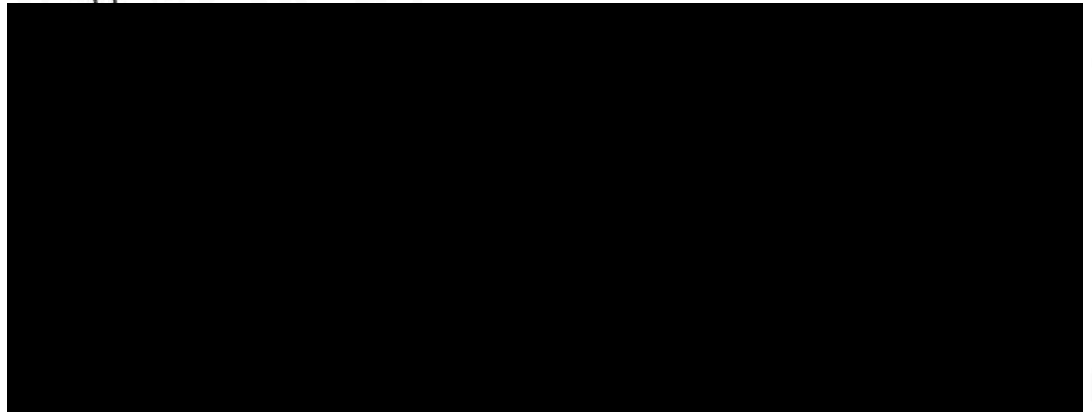
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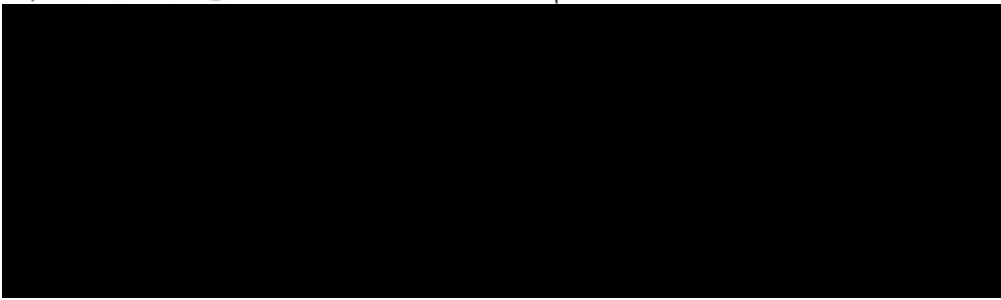


Date:

Peppa Stainer



Rachael Saulsbury



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Yes

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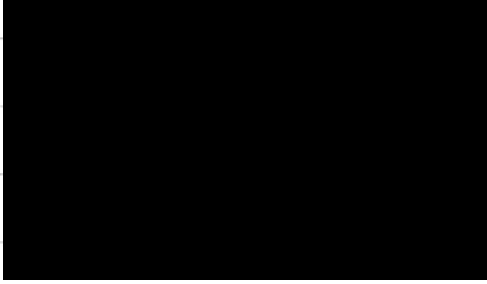
Signature:

[Redacted Signature]

Date:

28/2/21

Ron & Jill Stinger



We strongly object to the proposed flat development.

We would prefer a mixed housing development, with adequate parking.



Just add a sheet with your name and address/email. Anonymous submissions will not count.

To which part of the Submission Draft Local Plan does this representation relate?

Policy Paragraph Map Extract

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Sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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Signature:

Date:

From Simon Jenkins

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To which part of the Submission Draft Local Plan does this representation relate?

Policy Paragraph Map Extract

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	Don't know	<input type="checkbox"/>		
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Signature:

[Redacted Signature]

Date:

25/2/21

Simon Jenkins

[Redacted]

[Redacted]

Ref: SDWLP-91

Steve Gower
5 Charlecote Road
Worthing
West Sussex
BN11 1LX

25 February 2021

Worthing Borough Council
Planning Policy
Portland House
44 Richmond Road
Worthing
BN11 1HS

Dear Sirs,

I should like to add my name to points one to three of the attached objection, to which I concur.

Furthermore, I give my support to our friend's suggested modifications, with particular importance placed upon points three and four.

The new development needs to be sensitive to the current buildings and overall character of the area.

There are already major shortages of available parking in this area, this development will only serve to make matters far worse.

All too often we see developers run rough shod over councils, once construction gets under way. One only needs to look at the way the architecture and character, once the pride of Brighton and Hove, is being altered (destroyed actually) in the name of progress.

Please think very carefully before allowing Berkeley Homes to develop this site. We understand the need for new homes, I am all for a sensible development of this disused land, but we would do well to keep in mind, a developer's motives are to make a profit, not to serve the needs of a community.

Yours faithfully,



Steve Gower

Just add a sheet with your name and address/email. Anonymous submissions will not count.

To which part of the Submission Draft Local Plan does this representation relate?

Policy	<input type="text" value="A9"/>	Paragraph	<input type="text" value="4.29/4.30"/>	Map Extract	<input type="text" value="N/R"/>
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Mrs Sue Brown



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If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes

Yes

NO

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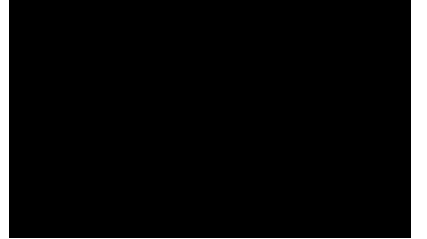
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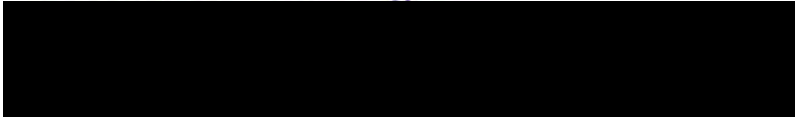
Signature:

Date:

5/3/21



Tabitha Wady



Just add a sheet with your name and address/email. Anonymous submissions will not count.

To which part of the Submission Draft Local Plan does this representation relate?

Policy	<input type="text" value="A9"/>	Paragraph	<input type="text" value="4.29/4.30"/>	Map Extract	<input type="text" value="N/R"/>
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Do you consider the Submission Draft Local Plan:

Legally compliant?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
	Don't know	<input type="checkbox"/>		
Sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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Complies with the Duty to Cooperate?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
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1. The site cannot deliver the capacity of homes identified. The Regulation 18 version of this Plan indicated a capacity of 85 town houses and flats. In order to achieve the new indicative number of 150 units it is highly likely that any future redevelopment scheme would only comprise a flatted development. Indeed, it is interesting to note that the developer is currently consulting on a proposal for 210 one-bedroom flats over 9 storeys with 0.6 parking spaces per flat on this site. They propose to submit the planning application in March 2021. The pre-application proposals are helpful in that they clearly illustrate that in order to achieve high densities only one bed units are likely to be delivered. It has therefore not been clearly demonstrated that this site can accommodate the anticipated number of units and still be in accordance with your housing mix policy DM1 and your SHMA which identifies that the most significant need in Worthing is for 2/3 bed housing. Although Para 5.8 of the Plan indicates that whilst higher density flatted schemes are more likely to deliver smaller properties, it still stresses that they "should also include a proportion of larger units with 3 or more bedrooms". Policy DM1 requires schemes to 'deliver sustainable, mixed and

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Signature:

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To which part of the Submission Draft Local Plan does this representation relate?

Policy Paragraph Map Extract

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Legally compliant?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
	Don't know	<input type="checkbox"/>		
Sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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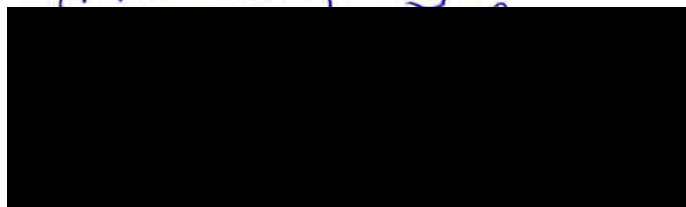
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Signature:



Date:

Tina Kingstley



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Policy Paragraph Map Extract

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Sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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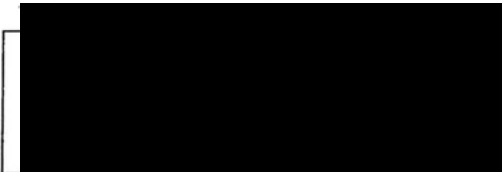
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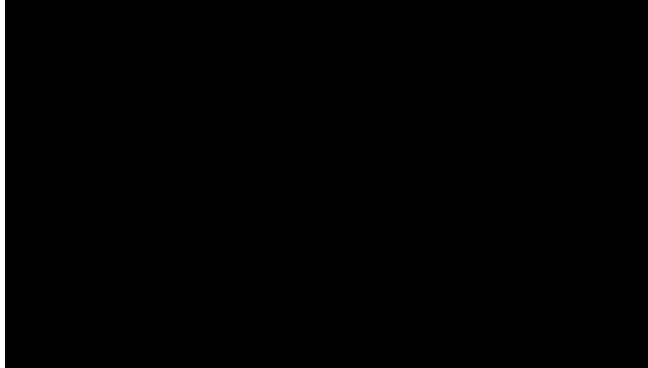
Signature:



Date:

25/2/21


TOM PARSONS



19. 03. 2021

re. Worthing Gasworks Development

Yours faithfully


MRS. D. M. LANE

email :



Just add a sheet with your name and address/email. Anonymous submissions will not count.

To which part of the Submission Draft Local Plan does this representation relate?

Policy	<input type="text" value="A9"/>	Paragraph	<input type="text" value="4.29/4.30"/>	Map Extract	<input type="text" value="N/R"/>
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Signature:

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JANICE KORDEK



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To which part of the Submission Draft Local Plan does this representation relate?

Policy Paragraph Map Extract

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Although I support the principle of development on this site for much needed family housing and in particular the policy requirement to 'address contamination issues' and to provide 'high quality residential', the Policy is not sound. This is because I do not believe the indicative capacity has taken into account the constraints of the site. I believe that a development at the density proposed cannot be achieved whilst still meeting the other policy requirements set out in the Plan including DM1 and DM2 and therefore the current allocation is undeliverable.

Reasons for objection

1. The site cannot deliver the capacity of homes identified. The Regulation 18 version of this Plan indicated a capacity of 85 town houses and flats. In order to achieve the new indicative number of 150 units it is highly likely that any future redevelopment scheme would only comprise a flatted development. Indeed, it is interesting to note that the developer is currently consulting on a proposal for 210 one-bedroom flats over 9 storeys with 0.6 parking spaces per flat on this site. They propose to submit the planning application in March 2021. The pre-application proposals are helpful in that they clearly illustrate that in order to achieve high densities only one bed units are likely to be delivered. It has therefore not been clearly demonstrated that this site can accommodate the anticipated number of units and still be in accordance with your housing mix policy DM1 and your SHMA which identifies that the most significant need in Worthing is for 2/3 bed housing. Although Para 5.8 of the Plan indicates that whilst higher density flatted schemes are more likely to deliver smaller properties, it still stresses that they "should also include a proportion of larger units with 3 or more bedrooms". Policy DM1 requires schemes to 'deliver sustainable, mixed and balanced communities". The current allocation at the densities proposed will not be able to meet other policy requirements and is therefore undeliverable.

2. I acknowledge that development proposals must make the most efficient use of land and I support Policy DM2 - Density. I support the fact that Policy DM2 makes clear that the capacity of any site must be based on a design led approach which consider the site context and character. The site constraints of A9 need to be recognised, particularly in respect of the need to be cognisant of the character of the nearby Conservation Areas and Beach House Park to the east. The proposed allocation does not fully recognise the nature of the road network around the site. Park Road is one way and very narrow, Lyndhurst Road is heavily constraint and highly residential in this location. It is a very busy road and is the main road to the A&E hospital. In view of these constraints I do not believe that the Proposed Allocation for A9 can deliver the indicative capacity without having a dramatic negative impact on the character of the area. It is therefore undeliverable.
3. The capacity of the site will also be dependent on the amount of parking proposed. The pre-application scheme clearly illustrates that the site could not deliver the number of units and the necessary levels of parking. The CPZ is currently oversubscribed and this will be exacerbated by the loss of hospital parking from this site. There needs to be an increased emphasis on the need for the proposals to provide either onsite parking to meet the need generated by the development or onsite measures to encourage sustainable transport and offsite contributions.

Please set out what modification(s) you consider necessary to make the Submission Draft Local Plan legally compliant or sound, having regard to the matter you have identified above where this relates to soundness. You will need to say why this modification will make the Submission Draft Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

1. The indicative number of units on the site needs to be reduced. This proposed modification is justified on the grounds that the higher indicative capacities are undeliverable.
2. Paras 4.29 and 4.30, which set out the site description need to be clear about heritage and local character constraints. This proposed modification is justified on the grounds that it would bring the proposed Allocation A9 in line with the requirements of Policy DM2.
3. There is an inconsistency in how development requirements are expressed for this site allocations. I note that Site A10 requires the development proposals to "not have an unacceptable impact on the amenity of neighbouring residents" and Site A11 requires any redevelopment to "be sensitive to the surrounding Conservation Areas etc". Similar requirements should be included in the list of development requirements for Site A9 and should include the following:
 - protection the character of the existing area, which is predominately low rise, family housing;
 - consideration of the two adjacent conservation areas at Warwick Gardens and Little High Street;
 - the requirement for a mix of homes that take account of the character of the area and the existing built environment and to properly address local housing need.
4. The requirement of 1 parking space per unit given the huge demand for parking in the area. Alternatively, the policy must emphasise the need for the proposals to provide onsite measures to encourage sustainable transport and provide offsite contributions

5. The photograph in the draft Local Plan needs to be replaced with an up to date picture. The gas holder was removed many years ago.

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes

Yes

NO

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

I believe the developer/promoter of the site will seek an even higher density than the proposed indicative amount in the draft plan of 150 units. They will argue that the 'abnormal' cost of decontamination will require higher densities to make the development viable. They will also argue that the height of the gas holder justifies nine storeys. Many people have moved into the area since the holder was removed many years ago. I do not think the density levels should be increased.

Given the location of the site, on the edge of the town centre with predominately family housing surrounding it, already constrained roads and parking, close to the hospital, I believe the site should provide a mix of homes, Furthermore, proper consideration should be given to the provision of onsite parking and/or the provision of onsite measures to encourage sustainable transport.

Please note: The inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

05/03/2021



Planning and Development

Ian Moody
Worthing Planning Policy Manager

Portland House
Worthing
West Sussex

Our Ref: MH/DtC Worthing LP

22nd March 2021

Dear Ian,

Re: Submission Draft Worthing Local Plan – Duty to Co-operate

Thank you for your letter of 29 January 2021 regarding the Worthing Local Plan (Submission Draft) and the Duty to Cooperate requirement. I note in particular the Council's formal request for assistance in meeting Worthing's unmet housing needs.

As you are aware, Adur District is similarly constrained with the South Downs to the north and the sea to the south and is predominantly an urban area with the limited greenfield sites. The Planning Inspectorate in 2017 accepted that Adur could not meet its own objectively assessed housing needs in view of the significant environmental and physical constraints, notwithstanding the allocation of two large greenfield sites at West Sompting and New Monks Farm and a broad location of 1,000 dwellings at the Western Harbour Arm, Shoreham Harbour.

Whilst, a review of the Adur Local Plan is due to be undertaken during 2021 this will be assessing the opportunities to meet Adur's own shortfall in housing and therefore is very unlikely to meet any of Worthing's shortfall.

Adur District has no objection to the Submission Draft Local Plan and accepts that Worthing has undertaken a thorough assessment of all opportunities to meet its future housing needs by maximising densities within the urban area and allocating 6 of its 9 greenfield sites. In particular, Adur supports the protection of Green Gaps particularly on the eastern side of the town providing a narrow but important gap between settlements to avoid coalescence and ensure the separate identity of Worthing and Sompting/Lancing within Adur District.



Duty to Cooperate

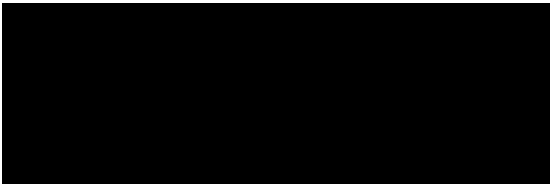
Adur District is committed to engaging positively with its neighbours to address strategic planning matters through the Duty to Cooperate requirement and to ensure that any 'larger than local' issues are highlighted and addressed. Adur District is a member of the West Sussex and Greater Brighton Strategic Planning Board (established in 2013) which also includes Worthing Council. The purpose of the Board is to identify and manage the spatial planning issues that impact on more than one local planning authority area and support better integration and alignment of strategic spatial and investment priorities.

The Board has committed to the preparation of a third revision of the Local Strategic Statement (LSS3), which is intended to explore growth options for meeting the area's unmet needs for housing and employment, and identify the strategic infrastructure required to support planned growth.

The intention is that LSS3 will provide a longer-term strategy for the sub-region over the period to 2050 which will help guide the future location and delivery of development to be identified and allocated within the constituent Local Plans. This demonstrates the level of commitment on behalf of the constituent local planning authorities to working collaboratively in line with the requirements of the NPPF. A Statement of Common Ground is being prepared and will set out the current position for all the authorities represented by the Board with a work programme for taking forward LSS3.

Given the above I am afraid that Adur District is unable to assist by meeting any of Worthing's housing shortfall but we will continue to work proactively with neighbouring authorities to see whether there are opportunities to address the housing shortfall across the wider Strategic Planning Board area.

Yours sincerely



Moira Hayes
Adur Planning Policy Manager

Email: moira.hayes@adur-worthing.gov.uk
Tel: 01903 221333
e-mail: james.appleton@adur-worthing.gov.uk

James Appleton
Head of Planning
Adur and Worthing Councils

By email only

date: 02/02/21

Dear James

RE: Submission Draft Worthing Local Plan – Duty to Co-operate

Thank you for your letter dated 29th January 2021. I write on behalf of Lewes District Council in response to your formal request regarding whether Lewes District is able to meet any of Worthing's unmet housing need.

Lewes District Council adopted a Local Plan Part 1 (Joint Core Strategy with the South Downs National Park) in 2016. This identified a requirement for 6,900 net additional dwellings between 2010 and 2030 across the whole District, which was subsequently disaggregated to a minimum of 5,494 net additional dwellings for the District outside the South Downs National Park (equivalent to 275 homes per year).

A significant amount of Lewes District (approximately 56%) is within the South Downs National Park, and large parts of remaining area of the District experience significant environmental and landscape constraints that limit the level of housing growth that can be accommodated. There are also significant issues relating to the capacity of existing and planned infrastructure that is necessary to serve growth. These reasons were accepted by the Inspector at the Local Plan Part 1 examination for not being able to meet the objectively assessed need in full at that time.

In May 2021, the Lewes Local Plan Part 1 will be five years old and the District's Local Housing Need (as calculated by the standard method) will increase to 782 homes per year. This will be the starting point for the new Lewes Local Plan for the part of the District outside of the National Park, which has recently commenced preparation. A Regulation 18 consultation anticipated for summer 2021, with eventual adoption expected by the end of 2023.

Contd...

Lewes District Council
Southover House
Southover Road
Lewes
East Sussex
BN7 1AB

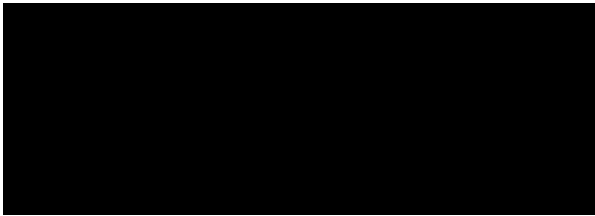
Eastbourne Borough Council
1 Grove Road
Eastbourne
East Sussex
BN21 4TW

Although the new local plan has not yet progressed sufficiently to enable a 'policy-on' housing figure to be identified, it is considered highly unlikely that Lewes District will be able to meet its own local housing need, nor have capacity to assist other authorities to meet their own shortfall, due to the environmental, landscape and infrastructure constraints identified in the examination of the Local Plan Part 1.

As you know, Lewes District Council is part of the West Sussex and Greater Brighton Strategic Planning Board and we look forward to working with Worthing and other partners to understand issues of unmet housing need across this part of the region and assessing the options for provision of housing and infrastructure at the sub regional strategic scale.

However, at the current time, we do not believe that Lewes District will be in a position to be able to assist in meeting any of Worthing's unmet housing need.

Yours Sincerely



Leigh Palmer
Head of Planning for Eastbourne and Lewes Councils

Phone: 07939 57 82 35
Email: leigh.palmer@lewes-eastbourne.gov.uk
Website: lewes-eastbourne.gov.uk

City Planning
Brighton & Hove City Council

James Appleton
Head of Planning and Development
Adur and Worthing Councils

12 February 2021

Dear James,

Submission Draft Worthing Local Plan – Duty to Co-operate

Thank you for your letter of 29 January 2021 regarding the Worthing Local Plan (Submission Draft) and the Duty to Cooperate. I note in particular the Council's formal request for assistance in meeting Worthing's unmet housing needs.

As you are aware, Brighton & Hove shares similarities with Worthing in being subject to significant physical and environmental constraints with the sea to the south and the South Downs National Park to the north, east and west of the city's built-up area. Other constraints include an already densely built up urban area and significant heritage assets including 33 conservation areas and 3400 listed buildings. This has led to a shortage of potential development sites and a substantial unmet housing need. The adopted City Plan Part One (adopted March 2016) sets out the strategic policy framework for the city to 2030 and includes citywide strategic planning policies and strategic site allocations. The plan sets a minimum housing provision of target of 13,200 new dwellings to 2030 which reflects the constraints facing the city. This represents just 44% of the objectively assessed housing need (OAN) figure (30,120) which informed the preparation of the plan.

There is also a significant need for affordable housing across the city. The 2015 Housing Assessment also identified a net need across the city for 810 affordable homes per year (representing 61% of the total OAN). Taking account of land availability and viability considerations, the affordable housing policy in City Plan Part One seeks 40% affordable housing on sites of 15 or more dwellings, with lower percentages sought for smaller housing developments. Reflecting this, the Implementation and Monitoring Plan sets a

target to achieve approximately 30% of all housing delivery as affordable housing. Again, this falls well short of the city's assessed requirement.

The City Council has also fallen well short of meeting the demand for self- or custom-build homes identified on the council's housebuilding register. As in Worthing, there is limited scope for meeting the demand within the city, as there are very few greenfield housing opportunities with the vast majority of housing development comprising high density development on brownfield urban sites.

The Council is currently progressing work on the preparation of City Plan Part Two (CPP2) which includes additional site allocations and detailed development management policies. Consultation on the Proposed Submission Plan took place September – end October 2020 and work is progressing to submit CPP2 for examination in April 2021.

Worthing Submission Local Plan

Brighton and Hove City Council (BHCC) does not wish to make any detailed comments on the draft Submission Worthing Local Plan. However, we support the commitment to maximise capacity within the existing urban boundaries and the allocation of several edge of centre sites. We recognise the constraints faced by Worthing faces and the significant difficulties posed by limited land availability.

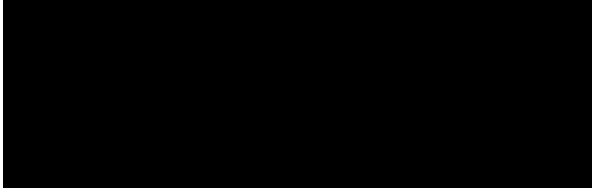
Duty to Cooperate

Brighton and Hove City Council (BHCC) is committed to engaging positively with its neighbours to address strategic planning matters through the Duty to Cooperate and to ensure that any 'larger than local' issues are highlighted and addressed. The City Council is a member of the West Sussex and Greater Brighton Strategic Planning Board (established in 2013) which also includes Adur and Worthing Councils. The purpose of the Board is to identify and manage the spatial planning issues that impact on more than one local planning authority area and support better integration and alignment of strategic spatial and investment priorities.

The Board has committed to the preparation of a third revision of the Local Strategic Statement (LSS3), which is intended to explore growth options for meeting the area's unmet needs for housing and employment, and identify the strategic infrastructure required to support planned growth. The intention is that LSS3 will provide a longer-term strategy for the sub-region over the period to 2050 which will help guide the future location and delivery of development to be identified and allocated within the constituent Local Plans. This demonstrates the level of commitment on behalf of the constituent local planning authorities to working collaboratively in line with the requirements of the NPPF. A Statement of Common Ground is being prepared and will set out the current position for all the authorities represented by the Board with a work programme for taking forward LSS3.

For the reasons set out above, regrettably, the City Council is not in a position to help meet any of Worthing's unmet housing development needs.

Yours sincerely,



Liz Hobden
Head of Planning
Brighton & Hove City Council

Economy and Planning

Contact name: **Elizabeth Brigden**
Email: **Elizabeth.brigden@crawley.gov.uk**

Date: **30 March 2021**
Direct line: **01293 438624**



Ref: SDWLP-101

Ian Moody
Adur and Worthing Councils
By Email Only

Dear Ian,

RE: SUBMISSION DRAFT WORTHING LOCAL PLAN – DUTY TO COOPERATE

Many thanks for your email, dated 8 February 2021, and formal letter regarding the publication of the Submission Draft Worthing Local Plan.

In addition, thank you for your offer of a meeting to discuss our respective Local Plans in the strategic context of West Sussex and Greater Brighton, which we held on 18 March 2021. It was extremely helpful to understand our current positions and discuss opportunities going forward.

This letter also responds to the letter received from James Appleton to Diana Maughan dated 29 January 2021 regarding the Duty to Cooperate, highlighting the level of unmet housing needs arising within Worthing borough and formally asking whether Crawley Borough Council would be able to meet any of Worthing's unmet housing need.

The shortfall of housing delivery anticipated to arise from Worthing, as referred to in your email and the Duty to Cooperate letter, of over 10,000 dwellings is noted.

As you are aware, Crawley borough has similarly tight administrative boundaries and its constraints, including aircraft noise arising from Gatwick Airport, mean it also has limited opportunities to deliver the housing need arising from within the borough as projected by the Standard Method. The draft Submission Crawley Local Plan is currently published for Regulation 19 consultation. This confirms Crawley has an overall housing need over the Plan period (2021 – 2037) of 12,000 dwellings and is able to accommodate 5,320 dwellings within the borough's administrative boundaries over that time, primarily through the completion of the last full neighbourhood in Crawley and intensification of residential development in the Town Centre, 44% of Crawley's housing needs can be met within the borough, taking forward the land constrained housing requirement as established in the current adopted Crawley Borough Local Plan 2015 – 2030.

On this basis, Crawley Borough Council is unable to meet any unmet housing needs arising from Worthing borough within Crawley borough's boundaries through the draft Crawley Local Plan review process.

The recent ONS Affordability Ratio (released 25 March 2021) has slightly reduced Crawley's Standard Method housing need, from 750 dwellings per annum (dpa) to 718dpa. Therefore, this has reduced slightly the overall unmet housing need arising from within the borough to 6,168 dwellings over the Plan period 2021 – 2037.

Crawley Borough Council has agreed a Statement of Common Ground with the other authorities within the Northern West Sussex (NWS) Housing Market Area (HMA): Mid Sussex and Horsham District



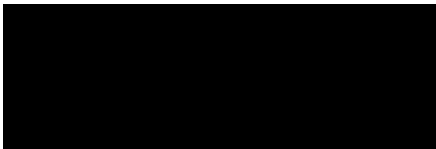
Councils¹. This confirms that the NWS authorities agree to continue to work positively together to seek to address the future housing needs of the HMA as far as possible, taking into account local constraints, and the need for sustainable development.

As discussed and agreed at our meeting on 18 March, the need to progress the West Sussex and Greater Brighton Statement of Common Ground for preparing the update to the Local Strategic Statement (LSS3) is also crucial and CBC will strongly support this process to ensure it is signed off in a timely manner, in addition to supporting the necessary technical evidence base to feed into LSS3.

Whilst the above concludes that Crawley Borough Council is unable to assist Worthing in meeting its unmet housing needs given its own shortfalls, we wish you every success with your Local Plan.

I have welcomed the mutually helpful engagement between our two authorities as we have been progressing our respective plans and look forward to continuing this positive cooperation. Please do let me know if there is anything I can expand upon to clarify further.

Yours Sincerely,



Elizabeth Brigden
Planning Policy Manager

¹ Northern West Sussex Statement of Common Ground (May 2020) Crawley Borough, Mid Sussex District, Horsham District and West Sussex County Councils: <https://crawley.gov.uk/sites/default/files/2020-06/NWS%20SoCG%20May%202020%20final%20signed.pdf>

THE WORTHING SOCIETY

FAO Ian Moody
Planning Policy Manager (Worthing)
Adur and Worthing Councils

Dear Ian,

RE WORTHING SOCIETY COMMENTS ON DRAFT LOCAL PLAN-SUBMISSION FOR EXAMINATION.

Thank you very much indeed for the opportunity to comment on the Draft Local Plan prior to the 'Submission for Examination.'

I am writing on behalf of The Worthing Society which is a heritage and conservation group established for thirty nine years. Our Constitution also allows us to comment on planning and development matters.

Here are our responses to the Consultation :-

LEGAL PROCESS AND SOUNDNESS AND DUTY TO CO-OPERATE:

The Society considers the Draft Local Plan fulfils this criteria. The document is presented in a clear but detailed way, and clearly addresses all aspects required for the sustainable , future growth and development of Worthing.

Two robust Public Consultations were carried out and there was a clear process following through from the original and comprehensive 'Issues and Options' document in 2016. Representatives of the Worthing Society were invited to a meeting to discuss the importance of protecting the town's heritage assets and to identify how they can contribute to both the economic and community life of Worthing in the future. We welcomed the opportunity to highlight the value of heritage assets which we consider generate a sense of place and pride in the town.

Other local groups have been invited to contribute to the plan regarding the protection by designation of the area's local green spaces. In particular the involvement of the Goring and Ilex Conservation Group, the Goring Residents Association and the Ferring Conservation Group exemplify this well. The preparation of the plan can therefore be said to fulfil the 'duty to cooperate.'

Furthermore the information for preparing the plan has been presented online in a comprehensive but visually contemporary manner which has no doubt encouraged both community involvement and public confidence. Each section has been clearly defined and examined which makes for ease of reference. Community responses have also been acknowledged and referred to at each stage of the consultation process as the plan evolved. References are made to the National Planning Policy Framework (NPPF and the Planning Policy Guidance which illustrates that these national policy documents have been adhered to. We therefore consider the test of achieving the necessary 'legal process and soundness' of the plan together with the 'duty to co-operate has been met.

Our further detailed comments regarding the soundness of the Draft Local Plan are as follows:

ENVIRONMENT:

We welcome the fact that the Draft Local Plan has recognised the importance of protecting and enhancing our local green spaces and natural gaps. The Covid 19 emergency has clearly illustrated the importance of public access to open green for protecting mental health, providing recreation and ensuring general well-being. It is significant therefore that the Draft Local Plan gives strong arguments for the Local Green Space Designation for both Goring Gap North/ Chatsmore Farm and the Southern Gap to give ongoing protection for these historic areas from speculative, inappropriate development. These areas are environmentally important forming a natural green lung between communities.

The references to the features of Arun's Local Plan that provide protection for the adjoining portions of the gap on the Ferring side, give added weight to justifying the Local Green Space Designation recommended within Worthing's Draft Local Plan.

Additionally it is important to note that there was significant and positive engagement with local conservation groups (particularly the Goring and Ilex Conservation Group) in the application for Local Green Space Designation. The plan has reflected the value of positive engagement with the local community and the concept of 'localism.'

CLIMATE CHANGE: and the declaration of Worthing's 'Climate Emergency' sets a clear policy going forward aiming to protect our environment for this and future generations.

*HERITAGE AND BUILT ENVIRONMENT.

The Society welcomes the fact that this section of the plan recognises that the seafront and proximate heritage buildings are one of Worthing's greatest assets. In addition the plan refers to future development reflecting the town's heritage in terms of good design, character and materials.

The plan also illustrates the depth of Worthing's heritage by referring to the 360 Statutorily Listed buildings, twenty six conservation areas, nine areas of Special Interest as well as a substantial Number of buildings included on the Local Interest List. This 'Heritage Map' is truly significant for a town of this size. The town centre conservation areas in particular contribute to the historic character of the town and tourism economy..

Our heritage assets are a unique and irreplaceable resource. We are encouraged that the value and protection of the town's heritage has been positively addressed. This acknowledgement in our view contributes to the 'soundness' of the plan.

BALANCE OF CONSIDERATIONS:

It is noted that the plan aims to address social cohesion, the quality of community life, and access to the natural environment. Protection of the Coastline, setting of the SDNP and the value of our

landscape (areas to the east and west) are also explored together with examination of infrastructure needs to create sustainable development.

* SELECTION OF DEVELOPMENT SITES: overall we considered the selection of the proposed development sites was carefully considered given the geographical constraints Worthing faces and the limited land space available. Generally good use has been made to include 'brownfield sites' whilst protecting green areas. There are however two sites where the Society wishes to highlight and record concerns which have recently been referred to us. They are as follows:

a) British Gas Works Site-Lyndhurst Road:

Although this area has been identified as a brownfield site suitable for mixed residential development, concerns have recently been raised by near residents following development plans. As a former industrial site which operated as a gasworks since 1839 near residents are extremely concerned about the effect on health and safety when chemicals are removed. A nine storey block requiring deep foundations is proposed on the site which could seriously disturb the inherent chemicals.

* We appreciate that such sites have been developed before but there is a precedent for health problems following removal of industrial chemicals both during and after construction. Given the close proximity to the town centre and the significant number of nearby dwellings we question whether an alternative use for this site should be considered by the Inspector on examination of the Draft Local Plan.

* There are potentially significant levels of contamination here which may render the area unsuitable for residential development

* Given the chemical constraints, the Society submits that the Inspector should examine the suitability of the site for inclusion in the plan before the current development proposal proceeds further.

b) Land East of Titnore Lane:

We remain concerned about this greenfield site which abuts the SDNP and is surrounded by ancient and irreplaceable woodland. The Committee's view is that the site should be left as countryside. We note that the landowners proposed development of 126 dwellings has been deemed harmful.

* However the Council's Landscape consultant has indicated that a less intensive land use may be appropriate. In our view. This leaves the door open for what in our view would constitute inappropriate development.

* We would ask that the Inspector closely examines this area when assessing the plan.

CONCLUSION

The Society considers it can be argued that overall the Draft Local Plan demonstrates a proper balance between development objectives, environmental objectives and the importance of recognising the value of our heritage assets to the character and identity of Worthing. We ask however that consideration be given to our comments regarding the Lyndhurst Road site and the area identified as Land East of Titnore Lane.

I apologise for the late submission of our comments which has been due to a serious IT failure. We appreciate the Inspector may not include our observations as they are out of time but nevertheless I hope they are helpful in some way. If there is an opportunity to speak on behalf of the Society at the Hearing Sessions, I would like to register to do so.

Yours sincerely,

Susan (Belton).

Mrs Susan Belton

Worthing Society Chair.

26.03.21

Date: 31 March 2021

Our ref: 341223

Ref: SDWLP-103



Worthing Borough Council

BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Sir/Madam

Planning consultation: Regulation 19 Consultation on the Submission Draft Worthing Borough Local Plan

Thank you for your consultation on the above dated 26 January 2021 which was received by Natural England on the same day.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England has reviewed the Regulation 19 Consultation on the Submission Draft Worthing Borough Local Plan. This letter provides Natural England's comments on specific policies and allocations. Please note that Natural England has not provided advice on all aspects of the plan, instead focusing on aspects within Natural England's remit; the absence of comments on a policy should not be taken as Natural England giving support.

Comments on Vision

With respect to your plan's vision we encourage the reference in V3 to ensuring Worthing's natural environment is both protected and enhanced.

We also encourage the reference in V4 to seeking significant progress towards Worthing becoming carbon neutral.

Finally, we encourage the reference to the Borough's preparations for the increasing effects of climate change, through adaptation and mitigation measures and by delivering a net gain in biodiversity.

Comments on Strategic Objectives

SP2 - Climate Change

The Climate Change Act 2008 sets the legal framework for adaptation policy in the UK, preparing for the likely impacts of climate change. The 2nd Climate Change Risk Assessment (2017), identifies risks to water supply, and natural capital, including coastal

communities, marine and freshwater ecosystems and biodiversity, as among the highest future risks for the UK relevant to the water industry.

This information can be used to develop mitigation and adaptation policies in Local Plans to help with climate change adaptation of water dependant ecosystems.

With respect specifically to your plan, Natural England welcomes your Policy SP2's requirements for developments to reduce energy used in construction and operations, prioritise active travel, incorporate green infrastructure, achieve biodiversity net gain and adapt and mitigate for the impacts of climate change.

SP3 - Healthy Communities

We encourage this policy's requirement for development to promote healthy lifestyles through improving the quality and quantity of open space and multi-functional green infrastructure assets.

Comments on SS2 - Site Allocations

With respect to the proposed allocations of policy SS2 Natural England notes that the following proposals all fall within close proximity to the South Downs National Park (SDNP):

- A1 Beeches Avenue
- A2 Caravan Club, Titnore Way
- A6 Fulbeck Avenue
- A13 Titnore Lane
- A15 Upper Brighton Rd

Given their location, development of the abovementioned sites must be designed to conserve and enhance the character of National Park and its setting and ensure consistency with the special character and importance of the protected landscape as set out in the SDNP Management Plan.

Furthermore, given the location of allocation A13 development at this site will need to consider any impacts on the nearby ancient woodland and ancient/veteran trees in line with paragraph 175 of the NPPF.

Comments on Spatial Strategy Policies

SS4 - Countryside and Undeveloped Coast

We encourage this policy's requirement to deliver improvements to green infrastructure.

We also encourage this policy's requirement to respect and improve access concerning the setting of the South Downs and international Dark Skies Reserve

SS5 - Local Green Gaps

We encourage this policy's designation of local green gaps and the requirement for developments to preserve the openness of the area, enhance natural capital benefits and enhance the existing green infrastructure network.

SS6 - Local Green Space

We encourage this policy's designation of local green spaces in line with the aims of the National Planning Policy Framework (NPPF).

Comments on Development Management Policies

DM18 - Biodiversity

We encourage this policy's requirements for all development to protect, conserve and enhance biodiversity.

We support the requirements of developments adjacent to the coast needing to demonstrate how they can reduce impacts of coastal squeeze.

We also strongly encourage the requirement for new developments to deliver above the mandatory minimum 10% biodiversity net gain. However, we would strongly encourage strengthening your wording to promote the maximum uptake of +20% net gain delivery, for example:

*“New developments (excluding change of use and householder) **should must** provide a minimum of 10% net gain for biodiversity - where possible this should be onsite. **Where it is achievable, a 20%+ onsite net gain is strongly** encouraged and is required for development on previously developed sites. Major developments will be expected to demonstrate this at the planning application stage using biodiversity metrics. This should be accompanied by a long term management plan.”*

DM19 - Green Infrastructure

We strongly encourage the implementation of a standalone green infrastructure (GI) policy (incorporating blue infrastructure as highlighted by paragraph 5.268) and the commitment to facilitate the creation of an integrated network of new and existing GI through a dedicated GI strategy.

We also support the requirement for developments to contribute to the implementation of this GI strategy and identify management and maintenance of GI.

Finally, we also support the policy's requirement for the protection, replacement and appropriate planting of trees.

DM20 - Flood Risk and Sustainable Drainage

We encourage this policy's promotion of Sustainable Drainage Systems (SuDS) which incorporate GI and multifunctional benefits.

DM21 - Water Quality and Protection

We encourage this policy's requirement to protect water quality and its promotion of replacing existing antiquated drainage systems with SuDS to improve water quality.

We would however encourage strengthening of requirement e) by setting the water efficiency requirement in line with Southern Water's Target 100's tighter value 100 litres per person per day or tighter where possible.

DM22 - Pollution

We encourage this policy's requirements concerning avoiding and mitigating increases in pollution.

Comments on Worthing Local Plan's Sustainability Appraisal

We have no significant comments to make concerning the Sustainability Appraisal Report of the Submission Draft Worthing Local Plan.

General Comments on the Plan

Importance of Biosecurity

The importance of biosecurity measures being implemented should be highlighted within the plan to ensure developers are aware of the need to consider the risk of spread of Invasive Non-Native Species (INNS) especially through Port developments. Guidance for biosecurity measures is available from the Non Native Species Secretariat <http://www.nonnativespecies.org/home/index.cfm>.

Considering Marine Plans

The Marine Management Organisation (MMO) is responsible for creating marine spatial plans in England. The boundaries of these plans include the mean high-water spring mark and the tidal extent of an estuary, and therefore could overlap with plans developed by your authority. Natural England therefore advise that reference to the relevant marine plan/draft plan should be made within your local plan to ensure consistency in approaches.

We welcome engagement with your authority as the Local Plan progresses and would be happy to comment further, if in the meantime you have any queries please do not hesitate to contact us. Depending on the nature of further queries we may be able to provide advice through our [Discretionary Advice Service](#).

For any queries relating to the specific advice in this letter only please contact Nathan Burns on 07554226006 or 02080266551.

For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours faithfully,

Nathan Burns

Area Team 14 - Kent and Sussex