

WORTHING LOCAL PLAN 2020 – 2026 EXAMINATION

Matter 2 – Broad Spatial Strategy and Strategic Policies





ISSUE 1:

Whether the spatial strategy of the WLP has been positively prepared, is justified, effective and will enable the delivery sustainable development in accordance with national policy?

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1. INTRODUCTION

- 1.1 Persimmon Homes welcome the opportunity of submitting representations to the Examination of the emerging Worthing Borough Local Plan 2020-2036.
- 1.2 This Statement on Matters 2 runs forward from the representations to the consultation on the Submission Draft of the Worthing Local Plan and should be read in conjunction with those representations.
- 1.3 It is necessary to re-emphasise here that the Country is in the midst of a long-standing housing crisis and the expressed objective in Paragraph 60 of the NPPF is to: *“significantly boost the supply of homes”*. That emphasis is especially necessary in relation to WBC’s substantial deficit in planned housing Land Supply.
- 1.4 These representations address the questions in relation to Matter 2: Broad Spatial Strategy and Strategic Policies.

2. MATTER 2: BROAD SPATIAL STRATEGY AND STRATEGIC POLICIES

Q12:

Paragraph 22 of the NPPF states that strategic policies should look ahead over a minimum period of 15 years from adoption. Is the WLP consistent with national policy in this regard?

- 2.1 It is worth noting that Paragraph 22 of the NPPF goes on to say:

“Where larger-scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery”.
- 2.2 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 Plan only sets out a vastly cut-down obligation for 3,672 dwellings over the plan period – resulting, effectively, in an unmet need of 10,488 homes by 2036.
- 2.3 There is also the twin problem that the Worthing Local Plan is limiting the timeframe to just 15 years. However, if the Council were to deliver its Objectively Assessed Need, in

accordance with the requirements in Paragraph 23 of the NPPF, then the necessary 30-year timeframe for the Local Plan would naturally apply. Consequently, the Council's approach is flawed:

- (i) it should start by allocating enough land to fulfil its objectively assessed need, and
- (ii) should set policies that looks ahead (at least 30 years), as per the NPPF.

2.4 Instead of doing everything possible to meet its Objectively Assessed Need, the Council has instead applied restrictive policies to justify a lower housing target. The starting point for the Local Plan should be to make every possible effort to fulfil its local housing need... which should be aligned with a longer vision (over a 30-year period). Bolstering the land supply in the Borough, in line with the Objectively Assessed Need, is critical toward meeting the Borough's target, addressing the housing crisis, and conforming with the requirements of the NPPF.

Q15:

Is the strategic balance between housing and other land uses appropriate and justified?

2.5 The answer is no. The WLP leans towards restrictive policies and, categorically, has not gone far enough towards meeting its Objectively Assessed Need. Other than statutorily-protected land, each and every opportunity needs to be considered fairly and openly, and opportunities for sustainable levels of growth which are available should be examined forensically by the Council as the means of fulfilling the over-arching requirements of the OAN.

Q26:

The Council's response to my initial letter concludes that the WLP does not need to consider Entry Level Exception Housing, as described in paragraph 72 of the NPPF, as there is no potential for any housing on the edge of the built-up area. Is this conclusion justified?

2.6 The answer is no - the conclusion is not justified. The fact remains that there are logical and sustainable locations for new housing growth on the edge of the built-up area that can contribute meaningfully towards the Council's local housing need. More greenfield sites are required (that are suitable and available) to meet the indigenous housing need. The Council should be obliged to ensure that "no stone is left unturned" in respect of potential housing sites. In that regard, the plan is not positively prepared, justified or consistent with national policy. Demonstrably, the monumental gap between the number

of new homes to be delivered by the Plan and the tenets of the National Framework gives every indication that Worthing BC is ignoring the national advice.

Local Green Spaces (Policy SS6)

Q33:

Are the Local Green Spaces identified in Policy SS6 justified and consistent with paragraph 101 and 102 of the Framework, the latter of which states that such designations should only be used where or of green space is:

- i. In reasonably close proximity to the community it serves;
- ii. Demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- iii. Local in character and is not an extensive tract of land.

2.7 The answer is no. It is not appropriate to foreclose on potential housing sites (to boost land supply) by applying restrictive designations, including Local Green Space, that (a) do not meet the criteria for Local Green Gap designations, or (b) prejudice the outcome of new house building obligations.

2.8 Dealing with point (a) directly above. Attached to this representation is a detailed note by Persimmon Homes' specialist landscape consultants, CSA, that assesses the criteria for such designations and specifically looks at its application on land at Amberley Drive, Ferring. In this case, our position is that it represents an unduly restrictive and disproportionate level of protection on the land; and that the site does not meet the criteria for designation. The correct application of Local Green Spaces Policy SS6 is required. However, we regret to say that the Plan embraces no such rigorous assessment.

2.9 Dealing with (b) at para. 2.7 above. Guidance on Local Green Space is set out in the Planning Practice Guidance and states how these designations relates to development:

“Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making”.
(Paragraph: 007 Reference IS: 37-007-20140306).



- 2.10 In the absence of a forensic approach to Local Green Space designations, the starting point for the Spatial Strategy needs to be for the Local Plan to meet, square-on, its housing target first and not obstruct future housing opportunities through restrictive policies that have been wrongly and inappropriately applied.
- 2.11 The plan-making process should not commence with designation of Local Green Space (or Local Green Gap) designations; otherwise, the LP is “strangled at birth.” Worthing Borough Council need to reassess each and every available site in the Borough, by revisiting the Local Plan. Because the identification of suitable and deliverable land for housing is the first and over-riding priority – as explained in para. 2.9 above.

3. CONCLUDING COMMENTS

- 3.1 In its present form the Local Plan is not fit for purpose. New housing, as its major component, is given nothing like the outcome that the Objectively Assessed Need demands. The figures are there, but they are being ignored - in that only a fraction of the obligations see their way through to the Local Plan. The Plan’s present spatial Strategy is completely un-anchored to the quantum of new housing required within the Borough.
 - 3.2 The Local Plan needs to demonstrate that each and every opportunity for accommodating new housing has been assessed forensically and fairly. With great respect, that process cannot be commenced when opportunities for new housing have been foreclosed by designation of land as Local Green Spaces (and Local Green Gaps).
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Amberley Drive, Ferring

Review of Policy SP6: Local Green Space – Draft Worthing Local Plan

Prepared by
CSA Environmental

on behalf of
Persimmon Homes –
Thames Valley

Report No: CSA/4083/02

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Appendices

Appendix A: Site Location Plan

1.0 INTRODUCTION

- 1.1 CSA Environmental has been instructed by Persimmon Homes Thames Valley to undertake a review of draft Policy SP6: Local Green Spaces of the Draft Worthing Borough Local Plan.
- 1.2 Persimmon Homes Thames Valley have an interest in land at Amberley Drive, Ferring (the 'Site'). The Site occupies an area of farmland indented into the urban areas of Ferring and Worthing. The eastern part of the Site lies within Worthing Borough, whilst the western half is in Arun District. The Site lies within an area described as the Goring – Ferring Gap in the Draft Worthing Borough Local Plan. The land within Arun District is identified as a Gap between Settlements in the Adopted Arun Local Plan. The location of the Site is shown on the Site Location Plan in **Appendix A**.
- 1.3 The Draft Worthing Borough Local Plan identifies that the eastern part of the Site is located in an area identified as Local Green Space in draft Policy SP6. The Local Green Space designation is described in the National Planning Policy Framework ('NPPF') and enables local communities to identify and protect green spaces which are of particular importance to them. The level of protection afforded to areas identified as Local Green Space is equivalent to that afforded by Green Belt.
- 1.4 Persimmon Homes Thames Valley, alongside Worthing Rugby Club, are promoting land within the Goring – Ferring Gap for the relocation of the rugby club. The proposed pitches, stadium and parking areas will be located within the north western part of the gap, entirely within Arun District.
- 1.5 Persimmon Homes Thames Valley are not promoting built development within the land which lies within the Worthing part of the Goring – Ferring Gap. Despite this, they are submitting representations in respect of draft Policy SP6: Local Green Spaces on the grounds that it represents an unduly restrictive and disproportionate level of protection on the land; and that the Site does not meet the criteria for designation.
- 1.6 This review considers the purpose of the draft Local Green Space designation and the degree to which it is appropriate to designate the land at Amberley Drive. It considers local and National planning policy / guidance and the Council's evidence base documents which underpin this designation. In addition, the document considers whether the Site meets the criteria for designation of Local Green Space, as set out in the NPPF.

2.0 PLANNING POLICY FRAMEWORK

National Policy and Guidance

- 2.1 The Local Green Space designation was first identified in the NPPF (NPPF, 2012). Paragraph 99 of the updated NPPF (2018) states:

'The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.'

- 2.2 Paragraph 100 sets out the criteria which must exist in order for a Local Green Space designation to be used. These are:

- a) *'in reasonably close proximity to the community it serves;*
- b) *demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- c) *local in character and is not an extensive tract of land.'*

- 2.3 Paragraph 101 states that policies for managing development in Local Green Space should be consistent with those in Green Belt.

- 2.4 Further guidance on Local Green Space is provided in the Planning Practice Guidance. The guidance on 'Open space, sports and recreation facilities, public rights of way and local green space' states that the Local Green Space designation is a way to provide special protection against development for green areas of particular importance to local communities (Paragraph: 005 Reference IS: 37-005-20140306).

- 2.5 In addition the guidance states how the Local Green Space designation relates to development:

'Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making.' (Paragraph:007 Reference IS: 37-007-20140306)

2.6 In respect of the types of green area which can be identified as Local Green Space the guidance states the following:

'The green area will need to meet the criteria set out in paragraph 77 (NB. now paragraph 100 of NPPF 2018) of the National Planning Policy Framework. Whether to designate land is a matter for local discretion. For example, green areas could include land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis.' (Paragraph: 013 Reference ID: 37-013-20140306)

2.7 In terms of proximity of Local Green Space to the community it serves, the guidance notes that this will depend on local circumstances but must be reasonably close.

2.8 The PPG also provides advice on the size of Local Green Space:

'There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgment will inevitably be needed. However, paragraph 77 (NB. Paragraph 100 in NPPF 2018) of the National Planning Policy Framework is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. Consequently blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name.' (Paragraph: 015 Reference ID: 37-015-20140306)

2.9 Paragraph: 016 (Reference ID: 37-016-20140306) notes that there is no minimum size limit.

2.10 In terms of public access, the guidance states that although some areas considered for designation as Local Green Space may have unrestricted public access, areas with no public access could be considered, for instance if they are valued for their wildlife, historic significance and / or beauty (Paragraph 017 Reference ID: 37-017-20140306).

Local Policy

2.11 Worthing Borough Council has published the Draft Worthing Borough Local Plan (2018). The following emerging policies are relevant to this report.

2.12 **Draft Policy SP6: Local Green Space** identifies the land identified as the Goring – Ferring Gap as a Local Green Space. The policy provides the following justification for the designation:

- b) *'The Goring Ferring Gap is designated as Local Green Space because the community value: its historic associations including important views that contribute strongly to a sense of place; wildlife; opportunities for bird-watching, stargazing, and quiet recreation; and the provision of relative tranquility in an otherwise unrelieved urban conurbation.*
- c) *Increased quiet and informal recreation would be compatible with this designation. However, additional formal recreation or structures to support informal recreation could damage the qualities for which the Goring-Ferring Gap is valued. Any proposal would have to demonstrate that it does not conflict with those values.'*

2.13 **Draft Policy SP5: Local Green Gap** also identifies the land in the Goring – Ferring Gap as lying within this designation. The policy states that these areas have been designated in order to retain the separate identities and character of the neighbouring settlements. The policy goes on to state that any development permitted within these areas must not, either individually, or cumulatively, result in the coalescence of these settlements.

2.14 The remainder of the Site to the west lies with Arun District and is covered by adopted **Policy SD SP3: Gaps Between Settlements** which protects the generally open and undeveloped nature of gaps between settlements to prevent coalescence and retain their separate identity, including Worthing to Ferring. It goes on to state that development will only be permitted where it meets the following criteria:

- *'It would not undermine the physical and / or visual separation of settlements;*
- *It would not compromise the integrity of the gap, either individually or cumulatively with other existing or proposed development;*
- *It cannot be located elsewhere; and*
- *It maintains the character of the undeveloped coast; or*
- *If a subsequent DPD or Neighbourhood Plan deems it appropriate through an allocation.'*

Evidence Base Documents

Landscape and Ecology Studies

2.15 Worthing Borough Council commissioned Hankinson Duckett Associates ('HDA') to undertake a landscape and ecology study to inform policy and potential development options in the emerging Local Plan. HDA prepared the following report:

- Landscape and Ecology Study of Greenfield Sites in Worthing Borough, November 2015.

2.16 The HDA document identified the Site as Site 4: Land North East of Amberley Drive. The 2015 study divides the Site into two zones: Zone A comprises the majority of Site 4 and Zone B occupies a smaller parcel in the east of the Site, to the immediate south of Goring Hall Hospital. By following the methodology set out in Section 2, the study considers that Zone A has a Major landscape, visual and ecological sensitivity to development, and is of Substantial landscape, visual and ecological value. By combining these judgements it concludes the Zone A has *negligible* suitability for development. In respect of Zone B, the study considers it to have both a Substantial sensitivity and value, and therefore to have *negligible / low* suitability for development.

Goring Gap Proposed Local Green Space Designations (June, 2018)

2.17 HDA on behalf of the Council, have also undertaken an appraisal of the landscape suitability of the Goring Gap sites for designation as Local Green Space. The appraisal considers the suitability for designation against a number of criteria, as follows:

- Proximity to the community;
- Special qualities and local significance;
- Demonstrably special qualities to local communities;
- Local significance: beauty;
- Local significance: historic significance;
- Local significance: recreational value;
- Local significance: recreational value.
- Local significance: richness in value; and
- Local in character and not an extensive tract of land.

2.18 The appraisal concludes that the Goring Ferring Gap fully meets the NPPF criteria for Local Green Spaces. In respect of the Goring Gap as a whole (which includes both Chatsmore Farm and the Goring-Ferring Gap) the appraisal states the following in respect of their performance against the NPPF criteria:

'Firstly, both parts of the Gap are adjacent to the community they serve. Secondly, they are demonstrably special to the local community and hold particular local significance for not just one, but all, of the examples provided

in the NPPF criteria. Lastly, both sites which form the Gap are well-defined parcels of land and are not extensive tracts or simply blankets of unremarkable open countryside.'

2.19 In respect of the Goring – Ferring Gap the report notes the following:

'The southern, Goring-Ferring Gap site is one of the few remaining stretches of undeveloped coastline within the locality and is widely used by the public for recreation. The site provides an undeveloped setting to the coastline, and despite being surrounded by settlement, is buffered from development by adjacent woodland and tree cover, allowing visual connection between the coastal plain and the South Downs National Park, uninterrupted by views of development.'

2.20 The findings of the appraisal are considered in more detail in the next section.

3.0 REVIEW OF POLICY SP6: GORING – FERRING LOCAL GREEN SPACE

- 3.1 The following section considers the emerging Local Green Space designation in respect of the land at Amberley Drive, which lies within land identified as the Goring – Ferring Gap.
- 3.2 The Draft Worthing Borough Local Plan seeks to provide a strategy for development and change in Worthing in the period up to 2033. Its purpose is to establish a spatial strategy and identify suitable locations for sustainable growth within the Borough. The emerging Local Plan acknowledges that growth in the Borough is very constrained, and at paragraph 1.30 of the emerging plan states:
- 'Limited land availability, infrastructure constraints, areas of flood risk, heritage assets and high quality landscapes around the borough means that there is little room for expansion. Put simply, it is the same features we want to protect which, in part, constrain the borough's ability to grow and develop. The overarching challenge is therefore to balance development and regeneration against the limited physical capacity of Worthing to accommodate it and the need to maintain a good quality of life for new and existing residents.'*
- 3.3 To compound matters, the Draft Worthing Borough Local Plan acknowledges that an increasing population and the special qualities of the area create a high demand for housing, in particular it identifies a shortage of affordable homes for younger people and people on low incomes.
- 3.4 The Council confirm that the most up-to-date assessment of the objectively assessed housing need (based on the standard method as set out in national planning guidance and the 2016 household projections published in September 2018) is 12,801 dwellings over the plan period (to 2033). This equates to 753 dwellings per annum across the plan period.
- 3.5 Despite the identified need for housing in the Borough, the Draft Local Plan has only identified an overall development capacity of 4,182 dwellings which can be delivered within the plan period. This represents a shortfall of 8,619 dwellings and equates to an annual housing target of 246 dwellings. The council acknowledge that only 33% of the overall housing need will be met.
- 3.6 The Council's spatial strategy is therefore grossly inadequate and results in a significant shortfall in the required level of housing to meet the Borough's needs. Draft Policy SP6 forms a key component of the Council's proposed spatial strategy.

Draft Policy: SP6 Local Green Spaces

- 3.7 The Council proposes to designate land within the Goring – Ferring Gap as Local Green Space. This is a significant designation and conveys on the land the highest level of protection akin to Green Belt, thus effectively precluding any development unless very special circumstances exist to justify it. Like Green Belt, Local Green Space boundaries can only be designated when a plan is prepared or updated, and should be capable of enduring beyond the plan period. Such a designation therefore carries significant weight.
- 3.8 In addition to the Local Green Space designation, the Council are seeking to designate the land within the Goring – Ferring Gap as a Local Green Gap. This approach is consistent with Arun District who has identified the land within the western part of the Site as a Gap between Settlements. The purpose of the gap designation is to prevent coalescence and maintain the separate identity of Goring and Ferring. Whilst this is a restrictive policy, it does not preclude development which meets the criteria set out in the relevant policies.
- 3.9 The Local Green Space designation would introduce another tier of protection to the land within Worthing Borough. As noted, the designation carries the highest level of protection consistent with Green Belt. Paragraph 143 of the NPPF states ‘inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.’ It is this test of ‘special circumstances’ which would also apply to Local Green Gaps.
- 3.10 In addition, paragraph 99 of the NPPF states that Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period. Again this is consistent with the approach set out in the NPPF in respect of the Green Belt. As a result, any amendment to the Local Green Space boundary can only be considered as a part of a Local Plan review, and only if special circumstances exist.
- 3.11 The Local Green Space designation therefore extends a level of protection to the land at Angmering Drive which is significantly greater than that afforded by the Local Green Gap policy. This approach is in our view entirely inappropriate and it is inconsistent with the approach adopted by the neighbouring Local Authority in Arun District.
- 3.12 The NPPF sets out the strict criteria which must be met in order to justify designation of land as Local Green Space. This is supported by the PPG which provides further guidance.
- 3.13 The NPPF is explicit that designating land as Local Green Space should be consistent with the local planning of sustainable development and

complement investment in sufficient homes, jobs and other essential services. This is supported by the PPG which states:

'Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making.'

- 3.14 Worthing acknowledges that the Draft Local Plan delivers a significant shortfall in the identified housing needs. The spatial strategy is therefore fundamentally flawed, and the Council should not be considering making Local Green Space designations until such time as the Local Plan is able to identify sufficient housing numbers.
- 3.15 Paragraph 100 of the NPPF identifies the criteria which Local Green Spaces should be assessed against. These criteria are considered in more detail below under the relevant heading. Where applicable, reference is made to the Council's own evidence base documents.

Reasonably Close Proximity to the Community it Serves

- 3.16 There is no specific standard for what constitutes reasonably close, however it would be reasonable to conclude that Local Green Spaces should have good access by foot from the local area they serve. In this case, the Site is located in close proximity to the adjoining residential area. The majority of the Site however is not publically accessible. There is a public bridleway which follows Ilex Way to the north, and Amberley Drive provides access between Marine Drive and the built up area of Goring to the east. There is also public access to the woodland to the east of the gap.
- 3.17 The Council's Local Green Space appraisal of the Goring – Ferring Gap, notes that the land in the Goring – Ferring Gap is well used for recreation, although it does not provide evidence to support this assertion. There are a number of informal walking routes which cross this land, however there is no formal right for public access to the vast majority of the area, save along the public footpaths. The Council also notes that the Site attracts visitors from further afield, however this is clearly irrelevant, as these visitors are not part of the local community and their purpose is unlikely to be to visit the farmland which comprises the majority of this area, although visitors are likely to be attracted to the adjoining shoreline.

Local in Character and a not an Extensive Tract of Land

- 3.18 The NPPF does not indicate what constitutes an extensive tract of land, however the PPG states the Local Green Space designation should not be used to provide a blanket designation of countryside adjacent to settlements,

and should not be used to achieve a new area of Green Belt by another name.

- 3.19 The overall Goring – Ferring Gap is approximately 68ha in size and the area within Worthing Borough is approximately 35ha. This clearly constitutes an extensive tract of land. It comprises open, arable farmland adjacent to existing development and an area of playing fields in proximity to Goring Hall. In terms of character, the majority of this area cannot reasonably be described as local, given that it is farmland with limited public access on the edge of the settlement, although the playing fields do relate more to the community that they serve. The farmland is adjoined by housing, but does not relate to the local community, like for instance a village green or an area of public open space would do. As suggested by the PPG, it is not the function of the Local Green Space designation to provide a blanket designation across a large area of open land, and therefore does not apply to the Site in this respect.
- 3.20 The Site's key function is to provide a visual and physical 'break' between the adjoining settlements of Ferring and Goring-on-Sea. This is supported by the Gaps between Settlements policy within Arun, and the draft Local Green Gap policy proposed by Worthing. The additional protection afforded by the Local Green Space designation would be tantamount to creating a new area of Green Belt in order to maintain this area permanently open, and as noted in the PPG, this is not the purpose of the policy.

Demonstrably Special to the Local Community

- 3.21 The NPPF states that in order to qualify as Local Green Space, an area must be demonstrably special to the Local Community and hold a particular local significance. It cites a number of examples, which are beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of wildlife. These factors are considered in more detail below.
- 3.22 In terms of scenic beauty, the Site has no local or national designation for landscape quality. It comprises, in the main, of large scale, open farmland. The mature Holm Oaks which border Ilex Avenue, the woodland in the vicinity of Goring Hall and alongside the eastern boundary are notable features. The undeveloped nature of the coastline to the south also contributes to the character and quality of this area. Notwithstanding this, the farmland and playing fields which comprises the vast majority of the proposed Local Green Space cannot reasonably be described as being of high landscape quality or being scenically beautiful.
- 3.23 The Council's appraisal notes that the Site provides visual connectivity between the undeveloped coastline and the National Park, including Highdown Hill, to the North. This relationship is a result of the open nature of

the Site, and whilst this characteristic permits inter-visibility between the coast and the designated landscape, it does not convey on the Site additional scenic qualities.

- 3.24 In terms of the Site's historic significance, the Site contains no listed heritage assets. The Council's appraisal states that the Site is associated with the Conservation Area at Goring Hall which includes Ilex Avenue which extends alongside the northern edge of the Site. It also notes the historic contribution of the woodland at the Plantation which is associated with Goring Hall. The Council's appraisal notes that the site provides a setting for the Grade II Goring Hall and that there are views across the fields between the hall and the undeveloped coast. These conclusions appear to be based on the assessment undertaken by the Goring Residents Association. Whilst this assessment identifies the presence of these historic assets and describes their attributes, it makes no objective assessment of the role that the Site plays in their setting. It is therefore not a robust basis to make any judgement in respect of the Site's historic significance.
- 3.25 The Site is in private ownership and the majority of the Site is not publically accessible. Whilst there is evidence of dog walkers using the Site, there is no formal right of access. There are playing fields located to the north east of this area. The Site is therefore of limited recreational value. The Council's appraisal notes that the recreational value of the Site is particularly important given the deficit of natural / semi-natural green space and amenity space in the Borough. This is misleading. The Site has limited access and makes no contribution to the Borough's open space in its current form.
- 3.26 In terms of tranquillity, the Site is bordered by housing and roads, although to the north and east these are contained by established vegetation. Given the size of this land parcel, its relationship to the adjoining coastline and its undeveloped nature, it will have some tranquil qualities which will likely be valued by residents of the surrounding built up area. Despite this, its proximity to housing and surrounding infrastructure, including lighting, means that these qualities should not be exaggerated. The Council's appraisal notes that this area has moderate tranquillity, however does not appear to have any factual basis for this assertion.
- 3.27 The Site comprises predominantly arable farmland which is of limited wildlife value, although the woodland which borders this area has higher value. The Landscape and Ecology Study undertaken by HDA confirms that the linear vegetative features have low local wildlife value, whilst the woodland is of high wildlife value. The ecology summary also confirms that the remainder of the Site is dominated by habitats of negligible interest.
- 3.28 The Council's Local Green Space appraisal, also undertaken by HDA, notes that the previous study identified the majority of the Site's ecological features

are of moderate to high ecological value, however fails to mention that the majority of this area is farmland of negligible value. In addition, the appraisal states that the significance of the Site's wildlife richness to the local community is highlighted by the 113 responses to the issues and options consultation. Whilst this may highlight that some local people identify that the Site has wildlife value, it is not a robust justification to suggest that it performs this function to any notable degree that it should be designated as Local Green Space.

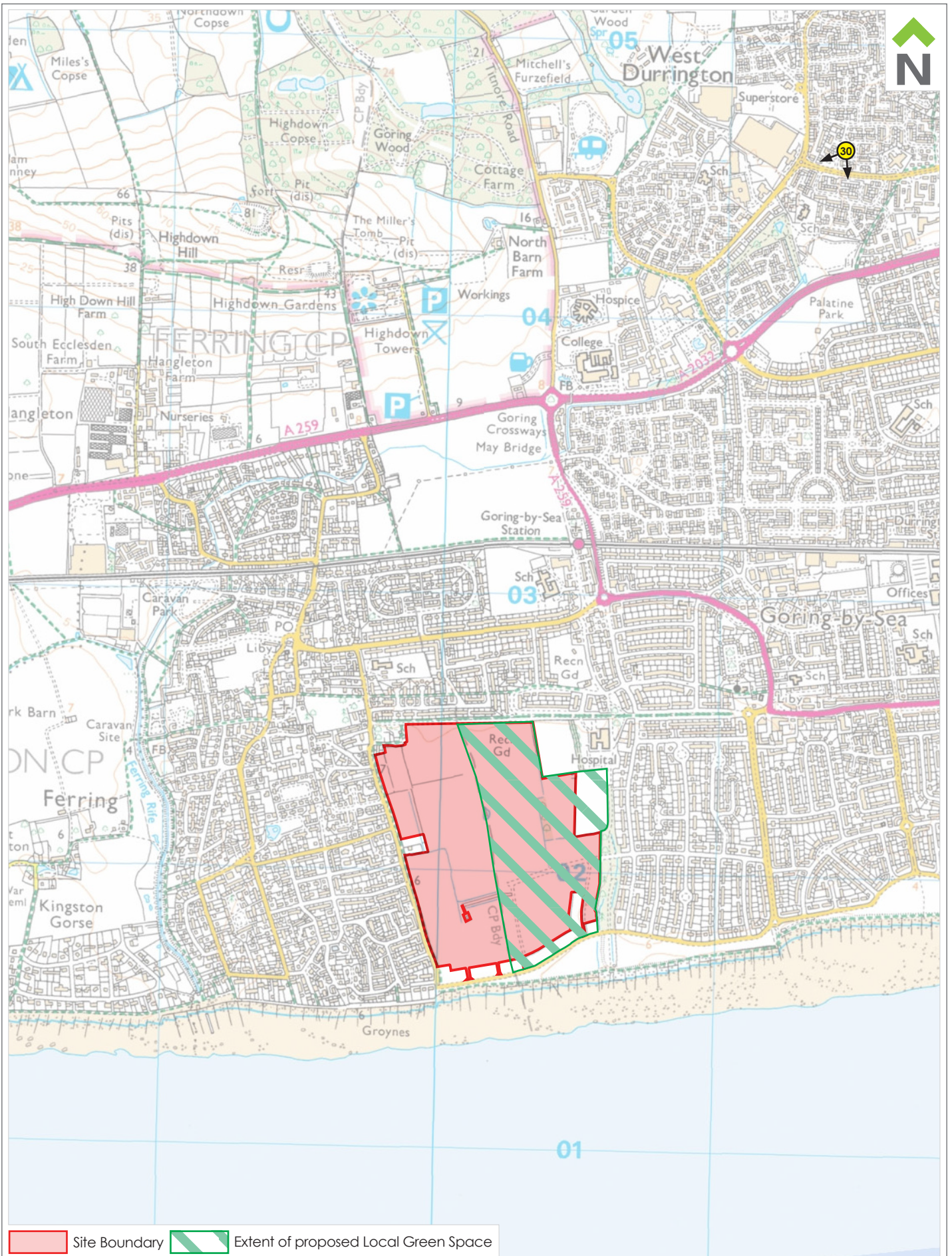
- 3.29 Our assessment of the Local Green Space designation in respect of the Goring – Ferring Gap has identified that it fails to meet the vast majority of the qualifying criteria set out in the NPPF. Given the significance of this designation and its restrictive nature, akin to Green Belt, we strongly feel that there is no justification for designating this Site as Local Green Space.

4.0 CONCLUSION

- 4.1 The Draft Worthing Borough Local Plan has identified an overall development capacity within the Borough of 4,182 new homes during the plan period. This represents a shortfall of 66% based on the objectively assessed housing need of 12,801. The Council's spatial strategy is therefore grossly inadequate and results in a significant shortfall in the required level of housing to meet the Borough's needs. Draft Policy SP6 forms a key component of the Council's proposed spatial strategy.
- 4.2 The NPPF is explicit that designating land as Local Green Space should be consistent with the local planning of sustainable development and should complement investment in sufficient homes, jobs and other essential services. Given the gross inadequacy of the Council's spatial strategy, the Council's decision to designate land in the Goring – Ferring Gap as Local Green Space, is contrary to the objectives of National planning policy.
- 4.3 The Council proposes to designate land within the Goring – Ferring Gap as Local Green Space. This is a significant designation and conveys on the land the highest level of protection akin to Green Belt, thus effectively precluding any development unless very special circumstances exist to justify it.
- 4.4 In addition to the Local Green Space designation, the Council are seeking to designate the land within the Goring – Ferring Gap as a Local Green Gap. This approach is consistent with Arun District who has identified the land within the western part of the Site as a Gap between Settlements. Whilst this is a restrictive policy, it does not preclude development which meets the criteria set out in the relevant policies.
- 4.5 The Local Green Space designation would introduce another tier of protection to the land within Worthing Borough. The Local Green Space designation therefore extends a level of protection to the land at Angmerring Drive which is significantly greater than that afforded by the Local Green Gap policy. This approach is in our view entirely inappropriate and unduly restrictive. It is also inconsistent with the approach adopted by the neighbouring Authority in Arun District.
- 4.6 CSA has assessed the Site against the criteria for designation as a Local Green Space as set out in the NPPF. Our assessment found that designation would be wholly inappropriate, given that the Site is an extensive tract of farmland and does not have qualities which are demonstrably special and of particular local significance.

Appendix A

Site Location Plan



Site Boundary
 Extent of proposed Local Green Space

 <p> Dixies Barns, High Street, Ashwell, Hertfordshire SG7 5NT t 01462 743647 e ashwell@csaenvironmental.co.uk w csaenvironmental.co.uk </p>	Project Worthing Rugby Club, Roundstone Lane	Drawing No. CSA/4083/104	Rev -
	Drawing Title Site Location Plan	Scale @ A4 NTS	Drawn SRW
	Client Persimmon Homes Thames Valley	Date December 2018	Checked LG



Dixies Barns, High Street, Ashwell,
Hertfordshire SG7 5NT

t 01462 743647

e ashwell@csaenvironmental.co.uk

w csaenvironmental.co.uk

Suite 1, Deer Park Business Centre, Eckington,
Persore, Worcestershire WR10 3DN

t 01386 751100

e persore@csaenvironmental.co.uk

w csaenvironmental.co.uk

Gallery 1, Citibase, 95 Ditchling Road,
Brighton BN1 4ST

t 01273 573871

e brighton@csaenvironmental.co.uk

w csaenvironmental.co.uk

WORTHING LOCAL PLAN 2020 – 2026 EXAMINATION

Matter 3 – Housing Provision, Housing Mix, Affordable Housing





ISSUE:

Has the WLP been positively prepared and is it justified, effective and consistent with national policy in relation to its provision for housing?

Contents

- 1.0 INTRODUCTION
- 2.0 MATTER 3 – HOUSING PROVISION: Q35, Q36, Q40, Q42
- 3.0 HOUSING MIX AND POLICY DM1: Q47, Q50
- 4.0 AFFORDABLE HOUSING AND POLICY DM3: Q65
- 5.0 CONCLUDING COMMENTS

1. INTRODUCTION – SETTING THE SCENE

- 1.1 Persimmon Homes welcome the opportunity of submitting representations to the Examination of the emerging Worthing Local Plan 2020-2036.
- 1.2 This Statement on Matter 3 runs forward from the representations to the consultation on the Submission Draft of the Worthing Local Plan and should be ready in conjunction with those representations.
- 1.3 It is necessary to re-emphasise here that, nationally, we are in the midst of a long-standing housing crisis and the expressed objective in Paragraph 60 of the NPPF is to: ***“significantly boost the supply of homes”***.
- 1.4 The supply of (new) homes is essential to both the social and economic well-being of communities and... unfortunately, the reality for current and future generations, because of house price inflation and the persistent under-delivery in the supply of new homes over the last 15 years, means that many will simply no longer be able to afford to buy a home today. In short, more homes equals lower prices – irrespective of location.
- 1.5 The long-standing housing crisis is genuinely affecting the lives of many people who cannot afford to buy a home today or who live in substandard accommodation. This is having many social implications and the corollary is the importance of ensuring housing sites are delivered expediently, and that supply is boosted to arrest severe housing price inflations.
- 1.6 In Worthing Borough, and across all LPA's, the supply of homes must reflect (each) Council's objectively assessed need... and this must follow through into suitable and deliverable housing sites, as the means of addressing social and housing needs.
- 1.7 The latest version of the NPPF/ housing provision continues with the goal of contributing toward the national economy; an even greater imperative following the pandemic. Housing development has a key role in supporting jobs and economic growth. Paragraph 81 states that significant weight should be placed on the need to support economic growth and productivity, taking into account both local businesses and wider opportunities for development.

2. MATTER 3: HOUSING PROVISION

Housing Need

Q35:

The Housing Implementation Strategy Topic Paper (HIS) concludes that the Council's Objectively Assessed Need (OAHN), based on the standard method calculation of local housing need, is 14,160 between 2020 and 2036. This equates to 885 dwellings per annum (dpa). Is there any evidence to suggest that this is not a robust assessment of OAHN?

- 2.1 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, despite the empirical evidence, 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.
- 2.2 While the “edited” housing target of 3,672 dwellings is manifestly unsound, the overall local housing need of 14,160 is a robust assessment of OAHN. We submit, therefore, that the standard method calculation is appropriate and that it should provide a “corner-stone” of the Local Plan.

Q36:

Is the Council's housing requirement justified having regard to recognise constraints, including but not limited to land availability, viability and infrastructure? In particular:

Does the evidence-base support the restrictions on development outside the built-up area, including Local Green Gaps? Are they a justified constraint to development?

- 2.3 No. 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.
- 2.4 However, the Plan's insistence on, as it were, non-examination on Local Green Gaps / Local Green Space designations (as development opportunities) is inimical to satisfying the Borough's housing-needs remit and the allied twin objective... of selecting the most sustainable locations for fulfilling new house-building. Persimmon Homes asserts that there are logical and meritorious housing sites that are capable of meeting housing need

in the Borough. Alas, the plan has not gone far enough to address the housing shortfall or the “opportunity sites” which are available.

- 2.5 The plan-making process should not commence with designation of Local Gap of Green Space/ Local Green Gap designations. Instead, Worthing Borough Council needs to revisit its Local Plan and through the land trawling process to identify suitable and deliverable sites for housing, which are available. That exercise has to be conducted in the context of a large portion (21.4%) of the Borough being located within the National Park, which provides considerable opportunities for recreation.
- 2.6 It follows that a portion of the remaining non-urban land should not be held back from development consideration – because Worthing is well served by its sea-side fringe and SDNP in serving the recreational needs of residents. Those two factors should then come together to obviate further land from being constrained by local green gap designations. And, in terms of the deficit in housing land supply, land opportunity areas need to be assessed for their utility in satisfying development needs. This is not unreasonable: Worthing BC has a huge deficit in land supply and it is the responsibility of the LPA to abide by the NPPF in its demand that new housing must be boosted considerably.
- 2.7 In light of the above, and the 10,488 dwellings shortfall in the Local Plan’s land allocations, the Worthing Local Plan is not considered to be positively prepared, justified, effective or consistent with national policy.
- 2.8 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, which are capable of contributing to the Council’s vast unmet housing need. In that sense, the Councils methodology and approach in the Local Plan is unsound.
- 2.9 Of course, this is much more than a question of market housing supply – because the orthodoxy of bringing affordable/ social housing into play on development sites means that 30% of provision becomes available for those in greatest need. In that way, Worthing BC’s huge under-allocation on new sites fails those in most need.

Q40:

What lead-in times and build-out rates have been applied to sites, both with and without planning permission? Have different approaches been adopted for sites with or without full planning permission? Are the assumptions used appropriate or justified?

- 2.10 Persimmon Homes is unconvinced about the Local Plan’s assumptions on build-out rates and lead-in times on sites with or without planning permission. In particular, just

because a scheme has planning permission does not mean it is deliverable: there may be a host of constraints preventing delivery. We are particularly concerned that a thorough (viability) examination of the Local Plan's list of apartment sites is warranted. In our experience, lead in times (by LPA's) are always over-optimistic.

- 2.11 Furthermore, deliverability is more pronounced on brownfield sites, where issues such as contamination and viability and protracted completion times come into play – these can seriously affect lead in times and undermine annual delivery targets. Therefore, it is fundamental to source housing sites from a range of sites, including both brownfield and greenfield sites; the latter can, very often, be much more straightforward to develop.
- 2.12 The point also 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. This is not an advocacy for lowering design requirements, we simply wish to make the point that they curtail development yields.
- 2.13 Accuracy on the numbers must then be matched by realism in lead-in times and build-out rates. Persimmon's experience on the key milestones are as follows:
- The average time to obtain an Outline Approval and 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 and a realistic allowance of 50-60 housing completions per year per site is reasonable;
 - On an apartment scheme, completion timeframes will vary, depending on the scale and complexity of the project but, crucially, occupations cannot occur until the block, as a whole, is completed and management structures are put in place.
- 2.14 The failure of Local Planning Authorities to meet their housing targets is certainly not anecdotal. The adjoining authority, Adur District Council, recently acknowledged at its Planning Committee on the 6th September 2021, that it: *"...failed the Housing Delivery Test and underdelivered against the housing requirements in the ALP for the last 3 years"*.
- 2.15 The Local Plan was adopted on the 14th December 2017 and the report goes on to say that: *"it will be extremely important to ensure a rigorous assessment of all potential housing opportunities is undertaken to ensure that the maximum supply achievable can be delivered"*.
- 2.16 Major housing sites (in Adur District) are failing to come forward and deliver housing completions within the anticipated timescales. Similarly, the neighbouring authority of Arun District is also failing to meeting its housing targets. There is no reason to believe that Worthing Borough will be any different, given the host of deliverability issues.



2.17 Therefore, it is crucial and fundamental that lead-in time and build-out rates are realistic and that Worthing Borough allocates more land for housing to ensure housing targets have a realistic prospect of being met.

Q42:

Should the Plan specify the level of unmet housing need and set out how the issue is expected to be addressed?

2.18 The Plan should set out clearly out how the local housing need is to be addressed. The Worthing Local Plan specifies the substantial level of unmet housing need, but it fails to address this acute problem by: (i) allocating sufficient land for housing, and (ii) reflecting on the inability of neighbouring LPA's to assist in ameliorating the shortfall... as set out in paragraph 26 of the NPPF. And while some engagement has taken place between the relevant bodies, it is clear that the Duty to Cooperate has not been met/ resolved.

2.19 As noted earlier, this is having obvious implications for those current and future generations who can no longer afford to buy a home. In pushing the deficit into the future and failing to provide a solution to the unmet need, the Council is failing to follow the advice in the NPPF.

3. HOUSING MIX AND POLICY DM1

Q47:

Paragraph 62 of the NPPF expects planning policies to reflect the assessed housing needs for different groups in the community. Is the WLP positively prepared, justified and effective in reflecting the needs of different groups in terms of size, type and tenure of housing?

3.1 Our concerns on social housing have been expressed above: that not enough is being made available because of the woeful approach by WBC in making sufficient land available. Moreover, Persimmon Homes do not believe the WLP has been positively prepared, justified and effective in reflecting the needs of different groups. The rationale for this is set out in paragraphs 3.2 and 3.3 below. In summary, the housing mix leans towards the provision of apartment blocks and does not reflect the changing needs of the consumer. Simply put, (many) people do not wish to live in apartment blocks; and the lack of supply of family homes is pushing up prices to unaffordable levels.

Q50:

Paragraph 5.8 suggests that priority should be given to family homes with 3 or more bedrooms. Is this justified and, if so, will the Plan be effective in achieving this requirement?

- 3.2 It is our contention that the plan will not be effective in achieving the requirement for 3-bedroom homes. That is a matter of concern – because (and setting aside the huge deficit) the emerging Local Plan leans towards the provision of apartment blocks and not family housing. Surprisingly, approximately 64.5% of the identified numbers are apartments – hardly consistent with the corner-stone aim of the SHLAA for a wide range of housing.
- 3.3 Moreover, as touched on earlier, apartment schemes bring with them a host of viability, deliverability and user -issues, especially in the current poor economic climate. By user-issues we mean greater demands for internal space, allowing working from home, and the need for households to have their own private outside amenity space. Flats do not facilitate the changing demands of the consumer which has been altered greatly following the pandemic, where people are opting to work from home, and require a much greater sense of conviviality in space and amenity. In short, there is a genuine need (from consumers) for more houses and not flats.

4. AFFORDABLE HOUSING AND POLICY DM3

Criterion (a):

Policy DM3 establishes a differing rate of affordable housing provision for flatted development on previously developed land (PDL), other types of housing oPDL and housing on greenfield sites.

Q65:

Are these rates justified by proportionate and up-to-date evidence about need and viability?

- 4.1 The answer is no. It is necessary to re-emphasise that the plan pays minimal regard to the acknowledged need for 490 affordable units per year, and that the affordability crisis is worsening year-on-year, as house price inflation continues. Of equal concern, DM3 requires that greenfield sites must carry a higher threshold (40%) of the affordable

housing requirement. The WLP approach must start with allocating sufficient land to meet its local housing need/ objectively assessed need... and (then) apply a more equitable target of 30% affordable housing to (more) green field sites.

- 4.2 The outcome of that would be greater overall affordable housing being brought forward. Instead of the Plan's insistence that most local people (and low-income families) will face life in an apartment building, rather than a house with a garden we urge respectfully that the National Framework's insistence on diversity in the (additions) to the housing stock is being ignored by WBC.
- 4.3 By ignoring the opportunities for fulfilling the OAN the Council has ignored one of the prime components for its residents: the need for 490 affordable units per year. And, instead, has backed itself into demanding that the numbers be made up through burdening greenfield sites with a 40% affordable contribution, alongside seeking the residue be made up through apartment building on "brownfield" land. This will deliver a fraction of the AH that is required, places a disproportionate burden on greenfield development, and consigns future generations to living in flats without gardens. Yet this is simply solved - more sites equal more opportunities for affordable housing, and more greenfield opportunities means more housing with gardens. The diversity in housing provision, as per the National Framework, is fulfilled.

5. CONCLUDING COMMENTS

- 5.1 The fundamental point of these representations is the serious deficit in land supply within the Worthing Local Plan, which deeply conflicts with the aims and aspirations of the updated NPPF - which seeks to significantly increase the supply of housing. The national guidance certainly does not countenance sanctioning local deficits in land supply, which is abundantly apparent in this case.
- 5.2 Moreover, today's house prices and the near-inertia in fresh sites being agreed and delivered means that much of the local population no longer have the opportunity to live in a decent home which they can afford, and where they want to live. This, itself, is creating unsustainable travel patterns which forces people to commute long distances to work, etc.
- 5.3 The current position in Worthing is stark: the Borough's Objectively Assessed Need identifies a base-line requirement for 885 dwellings per year, yet the emerging Local Plan seeks to only to provide a third of this requirement...and is failing to meet even that figure – as demonstrated by the 10,488 homes aggregate deficit.



- 5.4 In other words, the Borough is a considerable way off meeting its Needs-Based-Target and the persistent under delivery is contributing to the housing crisis. The term “crisis” is employed advisedly – few sites mean derisory provision of social housing... and derisory new homes means rising prices. Hence bolstering the land supply in the Borough, in line with its Objectivity Assessed Need, is critical toward meeting the Borough’s housing target and addressing the housing crisis. Unless these key tenets of National Policy are satisfied the LP is unsound, with concomitant deep social consequences.
- 5.5 It is unconscionable that an obligation for 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. It is not good enough to foreclose on opportunities to boost land supply by restrictive designations, including local green gaps at this crucial point in time.
- 5.6 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 - further exacerbating the deliverability issue. Fundamentally, more greenfield sites are needed in the Plan to meet the indigenous housing need: this cannot be emphasised strongly enough.
- 5.7 Our concern is that if the plan is adopted, in its current form, there is nothing being done to address the housing crisis - a situation in which many local and young people can no longer afford to buy a home. Fundamentally, the Plan is at odds with the terms of the National Planning Framework.
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WORTHING LOCAL PLAN 2020 – 2026 EXAMINATION

Matter 5 of the Inspectors Initial Matters, Issues
and Questions to the Council





ISSUE:

Whether the proposed site allocations are justified taking into account the reasonable alternatives, positively prepared in meeting the area’s development needs, effective in terms of deliverability over the plan period and consistent with national policy in enabling sustainable development?

Our submission references these considerations back to a specific block of land:

**Site Allocation A15,
Land at Upper Brighton Road, Worthing (7.5 ha).**

Contents

- 1.0 INTRODUCTION
- 2.0 GENERAL SITE MATTERS: QUESTION 89
- 3.0 ADDITIONAL SITE SPECIFIC QUESTIONS:
QUESTION 131, QUESTION 132, QUESTION 133
- 4.0 CONCLUDING COMMENTS

1. INTRODUCTION

- 1.1 This Statement is submitted in support of Persimmon Homes' land at Upper Brighton Road, and is made in conjunction with the Sompting Estate. Persimmon Homes and the Sompting Estate are collaborating to create a housing-based scheme that will deliver a broad package of community benefits.
- 1.2 The land was allocated for housing in the Council's Regulation 19 Local Plan (*Site Allocation A15*) for 123 homes, and we affirm that it is a suitable and sustainable location for new housing.
- 1.3 These representations, on Matter 5, summarise and expand upon those set out in response to the consultation on the Regulation 19 Local Plan and should be read in conjunction with those representations.
- 1.4 It is worth noting that Site Allocation A15 has been assessed in detail by the specialist team appointed by Persimmon Homes, which includes the following: Ecology, Landscape, Highways, Architecture and Design.
- 1.5 Moreover, the site's local context has been fully considered by the Council in deciding to allocate the site, and the design parameters have been further established through a collaborative approach with Officers at Worthing Borough Council - building upon their rationale for allocating the site. This work, and the Persimmon/ Officer dialogue culminated in the Council's pre-application response, dated the 12th August in which they noted:

"The key to successfully developing the site will be to integrate the development with the local context, having particular regard to the setting of the Sompting Conservation Area and view from the National Park..."
- 1.6 The development proposals have been shaped by expert highway and landscape advice from I-Transport and CSA Environmental Consultants respectively. Next, the conclusions of that work are distilled into a constraints and opportunities plan by CSA Consulting, which has shaped and informed the masterplan.
- 1.7 In summary, this response focuses on Site Allocation A15: the site can accommodate up to 123 homes. The allocation is split between two parcels of land, north and south of Upper Brighton Road; it including 30% affordable housing and areas of public open space. The latter is principally along the site's eastern edge, thereby intended to safeguard the amenity of the Sompting gap and the Sompting Conservation Area.

2. GENERAL SITE MATTERS

Question 89:

Is there any substantive evidence to suggest the site should not be allocated for housing, based on one or more of the following factors?:

- Biodiversity, in particular but not restricted to protected habitats and species;
- Green infrastructure or agricultural land;
- Landscape quality and character;
- Heritage assets;
- Strategic and local infrastructure including transport;
- The efficient operation of the transport network and/ or highway safety;
- Contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk;
- Open space, recreational facilities and public rights of way;
- Viability and delivery.

2.1 The constraints outlined above do not, in this case, present an impediment to the delivery/ development of the site. To affirm that conclusion it is worth highlighting the rationale behind the allocation of Site A15. Firstly, the site, which embraces to some 7.5 ha acres, is situated on the north-eastern edge of Worthing, and is currently in agricultural use. This edge-of settlement location is semi-rural in character.

2.2 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).

2.3 In short, the site relates well to the existing urban area: the south 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 broad corridor of the A27 is the southern edge of the South Downs National Park.

2.4 Further south, accessed via Sompting Road, is an industrial estate and business park with a broad range of commercial activities. And to the north-west, at the junction of Upper Brighton Road and the A27, is a retail park, including Sainsbury's and B&Q. These features mean that the site is in a sustainable location for new housing and able to integrate well into the built fabric of the existing settlement pattern.

2.5 Thus, this site is considered by the Borough as a suitable and deliverable housing site, and Persimmon Homes' assessment of Site Allocation A15 buttresses that LPA view as follows:

- There are no special planning designations affecting the land;
- The site is very 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: hence, it has limited intrinsic landscape value / character;
- There are direct connections to the local road network and adjoining schools;
- It is capable of early delivery following the necessary approvals.

2.6 Turning to the NPPF's requirements (*setting aside the Council's shortfall in housing numbers*), the allocation of this land for housing is: (i) consistent with the objectives of National Policy in enabling sustainable development and (ii) fully takes into account local circumstances to reflect the site's character, constraints and the provision of infrastructure.

2.7 Assuming that the site accords with the other requirements in terms of design, sustainability and landscape then the site is considered to be suitable for housing. Those "other considerations" are set out below.

3. ADDITIONAL SITE-SPECIFIC QUESTIONS

Q131:

Will the provisions set out in the development requirements be effective in ensuring development would not have an unacceptable impact on the setting of the South Downs National Park, nearby heritage assets?

(1) Landscape Considerations

3.1 CSA Environmental was instructed by Persimmon to undertake a landscape and visual overview of both parcels, with assessments running from December 2016 through to October 2021. The masterplan proposals have been worked up in conjunction with CSA to ensure the scheme's landscape considerations are considered fully.

- 3.2 Firstly, as noted earlier, the site is not covered by any designations relating to its landscape character and quality. Secondly, the site is visually contained by existing development in some form on three of its boundaries, and it relates well to the adjacent urban area. As noted in the CSA assessment of the land:

“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”.

- 3.3 The CSA reports notes that the Site is fairly well contained by boundary hedgerows and some trees; although the northern and eastern boundaries are more open. Contextually, the area is influenced by strong adjoining suburban elements and these factors have contributed to the Site being assessed as being of medium overall quality and value.
- 3.4 More broadly, 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. Where the Site is visible from the SDNP, it is seen in the context of the adjoining existing development, and vegetation on the eastern boundary clearly marks the separation between the Site and landscape between Worthing and Sompting.
- 3.5 CSA therefore concluded that development is capable of being accommodated without resulting in material harm to the landscape and visual character of the surrounding countryside, and to the South Downs National Park. Our consultants’ assessment, therefore, aligns with the Council’s own assessment.
- 3.6 The detailed site layout runs forward from a well-considered masterplan that embraces the local context and locational imperatives (*plus it embraces the dialogue with the LPA*). In that regard, 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 create landscaped edges to the scheme.

(2) Heritage Assets

- 3.7 The Council has acknowledged the potential heritage sensitivities of the Site A15 Allocation, including the proximity of the Sompting Conservation Area and the Grade II Listed Upton Farm House, which lie beyond the eastern edge of the subject site.
- 3.8 A heritage assessment, by Pegasus Group, has considered the significance of the assets and the emerging masterplan for development. The masterplan has been carefully designed to respect the significance of the heritage assets, guided by pre-application advice, with an appropriate eastern edge to the development. There, houses positively engage with the open space to the east by facing on to it, but with the houses

on the frontage closest to the assets served only by a short length of road, with vehicular access and parking to most plots which front this area being located to the rear of the houses, to the west within the body of the development. The eastern edge of the built form is softened by tree planting flanking a pedestrian footway. The open space between the built form and the Conservation Area is of an appropriate width to avoid perception of coalescence.

- 3.9 As such, it is the conclusion of the assessment that the setting of the Conservation Area and Listed building will be protected and the quantum of development proposed can be delivered in compliance with the draft policy relating to the allocation.

Q132:

Has full consideration been given to the impact of development on the highway network?

The answer is yes. In allocating the site, the Council have had full regard to the highway considerations: the site is well located to the existing road network – the northern boundary is defined by Upper Brighton Road, from which access will be taken. Upper Brighton Road is a two-way residential distributor road and it is proposed to improve the alignment of this road. There are currently no pedestrian facilities along the frontage, and as such the site will introduce a new footway, for use by existing and future residents. The delivery of the site will assist in bringing forward the section of the Adur and Worthing Local Walking and Cycling Implementation Plan (LCWIP), planned for Upper Brighton Road.

- 3.10 The strategy for development at the site would involve realigning Upper Brighton Road and creating two new access points to serve both parcels (north and south of Upper Brighton Road), via new priority T-junctions. Through Pre-Application discussions, West Sussex County Council highways has: (i) approved in principle the location of these new accesses and (ii) has raised no objection to the scheme's impact on the highway network (subject to the completion of a Transport Assessment, which is currently being produced).
- 3.11 The site is accessible on-foot to an array of local amenities, including Lyons Farm retail park, Sainsburys, Downsbrook Trading estate and Bramber Primary School, which is located immediately adjoining the site on its western edge via a public footpath. It is also accessible to existing bus routes and is within a reasonable walking distance to Worthing Rail Station. In terms of sustainability, its relationship to nearby facilities means it scores very well: it provides future residents with opportunities to adopt sustainable modes of travel.
- 3.12 Our specialist highway consultant, I-Transport, are satisfied that the access to the development can be accommodated and that the local highway network can

accommodate the level of development proposed by the Council. As noted, the HA do not depart from that conclusion.

Q133:

Is it clear to decision makers, developers and local communities when and how the playing field for Bramber First School is to be provided?

3.13 The answer is yes. The Sompting Estate has already entered into an agreement to Lease the land to the primary school. The Lease is dated the 24th January 2018, with a term of 25 years - it allows the primary school the use of the land for playing fields.

4. CONCLUDING COMMENTS

- 4.1 The Council has fully considered the site's capabilities and sensitivities - hence the delineation of the site boundary in the proposed Site A15 Allocation to: (i) respect the proximity of the Sompting Conservation Area, and (ii) respect views from the South Downs National Park.
- 4.2 It has been worth mentioning in these representations that there has been a long-standing consultation between Persimmon and Officers about the form and content of the proposals, a process extending over an 18-month period, to incorporate the scheme's landscape considerations, nearby heritage assets, and the assimilation of resulting traffic into the highway network. The Council issued its pre-application response on the 12th August 2021 which has been duly considered and amendments have since been undertaken to address the LPA's requirements.
- 4.3 The long-ranging dialogue with the LPA has led to much refinement and improvement in the proposals, and what emerges is a well-designed scheme, that aligns fully and respectfully with site's local context. We believe the work undertaken by Officers during the preparation of the Local Plan and the on-going dialogue has given the development proposals the necessary diversity in land uses and clear validation from both the LPA and the HA.
- 4.4 We have demonstrated that the overall scheme can be weaved comfortably into the site's locational setting and can graft into the existing neighbourhood. Secondly, we have highlighted that this is a highly sustainable location for housing. Thirdly, through the work of CSA Consulting, it has been established that this site offers the great advantage of having a green setting, via strong existing green open spaces to the east of the overall scheme, on Sompting Estate's Church Farm, and via proposed public open spaces in the eastern part of the development area.



- 4.5 This statement demonstrates that the locational imperatives – particularly the South Downs National Park and the Sompting Conservation Area - can be satisfactorily dealt with through the masterplan and detailed proposals.
 - 4.6 The allocation of the site is considered appropriate to its setting and fully embraces the objectives of the NPPF's and its sustainability imperatives. Beyond those concerns, the development of this site offers a soundly-based urban extension with an excellent interplay of housing, landscaping and open space.
-