



# THE WORTHING SOCIETY

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## **APPEAL STATEMENT - CHATSMORE FARM - AWDM/1264/20**

My name is Susan Belton, Chairman of the Worthing Society. We are a heritage and conservation Society, established for forty years. Our Constitution permits us to comment on the broader planning issues as they affect Worthing and its environs.

The comments this morning reflect the very serious concerns of the Committee, our members and indeed members of the public who have contacted us via our website and social media.

The proposal to build 475 dwellings and associated buildings would have a catastrophic effect on the surrounding landscape and infrastructure. The natural 'green lung' forming the separation between Goring-by-Sea and Ferring would be lost. This would lead to the unwanted coalescence of these settlements. Historically this open area has been a much valued open natural gap.

Furthermore the 'setting of the South Downs National Park', one of the most important heritage assets, both nationally and locally would, in our view, be permanently and significantly harmed. The setting of Highdown Conservation Area, which is within the Park and directly opposite Chatsmore Farm, would also be seriously affected. The Conservation Area includes the Grade II\* Listed Highdown Gardens and there are views from the South Down across the Gap to the sea, which are appreciated by walkers.

In particular, the exceptional view from the top of the drive leading up to Highdown Gardens and the scheduled monument, Highdown Hill, looking towards the sea, would be compromised. There would also be a negative impact on the other proximate heritage assets in the vicinity which contribute positively to the overall historic character of the area, its historical development and which display group value. This would not, in our opinion, be consistent with the National Planning Policy Framework - Section 16, or the Planning (Listed Buildings and Conservation Areas) Act 1990.



View looking south down Highdown Rise towards proposed development site



Looking north up to Highdown Hill

We respectfully suggest that the Inspector makes a site visit to the drive leading up to Highdown during the consideration of the Appeal. The importance and context of Chatsmore Farm is clearly illustrated from this viewpoint as well as the east/west dimension. At present, this is farmed agricultural land which adds to the overall character of the area, giving connectivity to the SDNP.

A representative of the Worthing Society would be pleased to accompany the Inspector to a site visit to assess this aspect. Another important consideration here is that the national park is identified as an International Dark Sky Zone and this designation would be compromised by a significant development on Chatsmore Farm. The extent and mass of the proposal would be intrusive.

In terms of Local Planning Policy we consider the Appeal is premature in that the Inspector's Report following the EIP of the Local Plan has yet to be published. The Draft Plan is, in fact, well developed. The application itself is contrary to the policies in the Draft Local Plan which supports the designation as Local Green Space and, in particular, policies SS5 and SS6. The building site itself is designated as a Strategic Gap in the Plan and this designation remains, even if the local green space is not approved.

Chatsmore Farm is identified in the draft plan as part of the historic landscape. The land is clearly outside the Built Up Area Boundary as defined by the Core Strategy and has clearly not been identified as suitable for residential development. In fact, in the Post Hearing Advice letter following the Examination in Public of the Local Plan, the Inspector has stated and I quote:

***“Notwithstanding the presence of the road, the site is well-related visually to the SDNP and thus provides an opportunity for the countryside to penetrate the built-up area”.***

The developer, Persimmon, appears to make light of the value of the Draft Local Plan but it was the subject of robust Public Consultations. Comments from the local community emphasised a strong desire to retain Chatsmore Farm as an open green gap, preventing coalescence of the settlements.

The application resulted in over 1,250 objections including strong representations made by the National Trust, CPRE and the National Park Authority. Our green infrastructure is an irreplaceable and historic resource forming a tangible legacy for our future generations. The recent climate change concerns and the Covid 19 emergency have highlighted the importance of our green spaces for physical and mental well-being. Our remaining green infrastructure is an irreplaceable resource and a tangible legacy to our future generations

In terms of the effect on the local community infrastructure, developing Chatsmore Farm will make congestion worse at the two roundabouts at Goring:-

1. The longest queues will be in Littlehampton Road, between 229 and 272 vehicles are the two forecasts for 2033 and Persimmon's own forecast is that the queue will be 102 vehicles longer in the morning than it would be if the development did not take place.
2. This increase surely represents a "severe" effect, and so rules out the development, as WSCC has argued. Roundabouts already operate over and above capacity.

3. Persimmon quotes two Inspectors who considered a case in Cheshire, who both argued that increased congestion merely affected the convenience of car commuters. This argument flies in the face of government policy, which treats drivers' time as an economic cost. Increasing the time spent on their journeys is therefore an economic loss, while reducing the time spent on travel is an economic benefit. The time savings from road improvements provide the justification for the Road Investment Strategy.
4. The fundamental weakness of the assessment on the impact of the development on the local roads is that it does not extend beyond 2033.

National Highways set the Design Year for its schemes 25 years ahead, so the Goring roundabouts should be designed for the traffic expected in 2047. The government wants to reduce traffic in the long term, but it has yet to propose policies that would achieve this goal. They would have to offset the effect of the switch to electric cars, which are cheaper to run than oil-fuelled cars and will therefore increase traffic. Congestion may well be worse in 2047 than in 2033.

5. More capacity at the roundabout would be wanted, but there is no space for bigger roundabouts or grade-separated junctions. The long term outlook for these junctions is greater congestion, and the extra traffic created by the Chatsmore Farm development would make the situation intolerable. The road system around Chatsmore Farm cannot cope with the traffic it would produce in any realistic scenario.

The natural constraints of the area and the cumulative effect of other developments, already within the environs, militate against any possibility of producing a safe, sustainable transport system. This is a major defect in the proposal which makes the development of this site untenable either now or in the future.

## SUMMARY

In summary, and for the reasons stated, the Society considers the land fails to offer an acceptable location for development and this Appeal should be refused. The application by Persimmon is both premature and defective in all respects and will result in a serious loss of amenity. There would be a negative impact on the setting of the associated heritage assets and the irreplaceable loss of local green space.

The lack of a 5-year housing land supply should not, in our view, open the door to speculative and inappropriate development on this sensitive site. There are other more suitable brownfield sites identified in the Draft Local Plan.

*Susan Belton*

Worthing Society Chairman

18 January 2022