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APPENDIX - HERITAGE SoCG

1. INTRODUCTION

- 1.1 This Updated Statement of Common Ground (SoCG) has been prepared in conjunction with Worthing Borough Council (the Local Planning Authority).
- 1.2 It relates to a planning appeal made pursuant to Section 78 of the Town and Country Planning Act 1990, in respect of Land north west of Goring Station, Goring-by-Sea, near Worthing (the Appeal Site).
- 1.3 The purpose of the SoCG is to provide an update on the areas where the principal parties (the Appellant and the LPA) are in agreement and to narrow down the issues that remain in dispute.
- 1.4 At the CMC the parties were also requested to concentrate on the matters in dispute to assist the Inspector in understanding the respective positions of the parties. This will allow the Public Inquiry to focus on the most pertinent issues.

2. THE APPEAL SITE LOCATION AND DESCRIPTION

- 2.1 It is agreed that there has been no material change to the appeal site on the ground since the previous appeal was determined.
- 2.2 A full description is provided in the original SoCG.

3. THE APPEAL PROPOSAL

3.1 It is agreed that the development proposals remain unchanged.

3.2 A full description is provided in the original SoCG.

3.3 Notwithstanding the above, the Appellant is also now proposing the following through planning obligations and/or conditions:-

- a. At least 10% biodiversity net gain (BNG)
- b. Commitment to enhanced internal accessibility standards - Part M4(2) and M4(3)
- c. Homes built to Carbon Zero standard
- d. A cascade to prioritise market homes for local people
- e. The transfer of land at Manor Farm

4. APPLICATION PLANS AND DOCUMENTS

- 4.1 It is agreed that the application plans and documents remain unchanged from those that are listed in the original SoCG except for the updated and now agreed BNG assessment [CD.M6].

5. THE REASONS FOR REFUSAL

- 5.1 It is agreed that the LPA has updated its reasons for refusal since the previous public inquiry.
- 5.2 An update report [CD.A25] was considered by the Council's Planning Committee in August 2023. This updated Members on the outcome of the Legal Challenge and it provided an updated assessment of the proposals in the context of the new Local Plan. Officers recommended that the LPA continues to contest the appeal.
- 5.3 Having considered the advice from Officers, the Committee resolved to defend the appeal on the basis of updated reasons for refusal which read as follows:-

"1.The proposed development is outside of the built-up area as defined by the Worthing Local Plan (2023) and does not comprise development essential to the countryside nor does it comprise development of entry level exception sites. The proposed development [sic] also and would have an adverse impact on the setting of the adjacent South Downs National Park and therefore is contrary to paragraph 176 of the National Planning Policy Framework and policies SS1 and SS4 of the Worthing Local Plan.

2. The proposed development comprises development in a designated Local Green Gap which would undermine the physical and visual separation of Goring and Ferring therefore compromising the integrity of the gap. Further, the proposed development by virtue of its scale would fail to conserve and enhance the benefits and services derived from the area's Natural Capital nor maintain the site as part of a cohesive green infrastructure network. The proposal therefore fails to comply with policies SS1 and SS5 of the Worthing Local Plan (2023).

3. It has not been demonstrated to the satisfaction of the Local Planning Authority that the scheme can deliver the biodiversity net gain required by policy DM18 of the Worthing Local Plan (2023)."

- 5.4 It is agreed that these RfR now replace the RfR that were identified in the original decision notice [CD.A24].
- 5.5 It is agreed that RfR3 is capable of being resolved through planning obligations/planning conditions and therefore there is no need to present evidence on this matter.
- 5.6 It is agreed that the appeal should therefore focus on reasons for refusal 1 and 2.

6. PLANNING HISTORY

- 6.1 It is agreed that there has been no change to the planning history of the site, save for the quashed appeal decision that is now to be re-determined.

7. PLANNING POLICY

- 7.1 This section identifies the planning policies and guidance that will be of most relevance to this appeal. All the documents referred to will be included in the list of Core Documents.
- 7.2 This section replaces Section 7 from the original SoCG in its entirety.

National Guidance

National Planning Policy Framework

- 7.3 The revised NPPF (December 2023) will be a material consideration in the determination of the appeal. Both parties will make reference to the NPPF in support of their case.

National Planning Practice Guidance

- 7.4 The NPPG will be a material consideration in the determination of this appeal. Both parties will make reference to relevant sections of the NPPG.

The Development Plan

- 7.5 Both parties agree and accept that under the provisions of Section 38(6) of the Planning and Compulsory Purchase Act 2004, applications for planning permission must be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 7.6 At the time of preparing this SoCG, the Statutory Development Plan covering the appeal site comprised:-

- Worthing Local Plan (March 2023)

Worthing Local Plan

- 7.7 The Worthing Local Plan was adopted on 28th March 2023. The new Local Plan at §1.4 confirms that it replaces the Council's local planning policies set out in the Core Strategy (2011) and the saved policies from the Worthing Local Plan (2003).
- 7.8 From the Policies Map that sits alongside the WLP, it can be seen that:-

- a. The appeal site is located adjacent but outside the defined built-up area.
- b. As a consequence, it is to be treated as "countryside" in planning policy terms.
- c. The site along with other land to the north of the Rife (beyond the site) is identified as a Local Green Gap (the wider tract of land being known as Chatsmore Farm) to which Policy SS5 applies.
- d. The site is not allocated for housing.
- e. The site is not within the South Downs National Park, although it is agreed that it is in its setting.
- f. There are no other landscape, ecology, heritage or other designations directly affecting the site.
- g. The site is not defined as public open space and nor is it defined as Local Green Space.

7.9 It is agreed that the most important policies for this appeal will include:-

- SP1 – Presumption in favour of sustainable development
- SS1 – Spatial Strategy
- SS4 – Countryside and Undeveloped Coast
- SS5 – Local Green Gaps

7.10 The Council does not rely on any other conflicts with Local Plan policies, subject to the completion of a satisfactory s.106 obligation.

Emerging Development Plan Documents

7.11 It is agreed that there is no emerging Local Plan that requires consideration.

Neighbourhood Planning

7.12 It is agreed that there is currently no "made" Neighbourhood Plan which covers the appeal site.

8. MATTERS NOT IN DISPUTE

8.1 This section sets out the matters that are not in dispute between the Appellant and the Local Planning Authority.

Format of Planning Application and Supporting Material

8.2 It is agreed that the format of the outline planning application forms, plans and the supporting documents fulfilled the requirements of the various regulations and validation checklists, applicable at the time of submission.

8.3 It is agreed that the LPA agreed to register the application as an outline application with all matters of detail reserved for subsequent determination.

8.4 It is agreed that the LPA did not exercise its powers to request any of the Reserved Matters to be unreserved.

Environmental Impact Assessment

8.5 It is agreed that on 7th December 2016 the Secretary of State issued a Direction confirming that an EIA would not be required to support an application for 475 dwellings and other associated works.

8.6 It is agreed that it is not necessary to provide an EIA for the purposes of this appeal.

The previous appeal decision

8.7 It is agreed that the current appeal should be considered on its own individual merits and in the context of the planning policy framework that exists now and that the Inspector must form her own independent planning judgment on the merits of the appeal.

8.8 It is agreed that the new Inspector is not bound by the content of the quashed appeal decision, but those parts of the decision which involve planning judgments which were not part of the decision to quash may be material considerations for subsequent decision makers.

8.9 It is agreed that the weight to be afforded to individual planning considerations will remain a matter of judgement for decision makers and the new Inspector will need to reach her own conclusions in this regard.

- 8.10 It is agreed that those parts of the previous decision where the Inspector was found to have fallen into error are to be disregarded.

The NPPF Tilted Balance

- 8.11 It is agreed that the tilted balance is engaged in this case, although the LPA says that tilted balance is disapplied because it says the proposals do not accord with NPPF paragraph 182 in relation to development within the setting of National Parks.
- 8.12 It is agreed that the public benefits would outweigh the alleged heritage harms in the context of NPPF paragraph 208. As such it is agreed that the tilted balance is not disapplied for reasons related to heritage.
- 8.13 It is agreed that the LPA previously agreed that there were no NPPF footnote 7 policies that would provide a clear reason for refusal, and which would dis-apply the tilted balance. The LPA's position has changed with regards to the National Park.

The Setting of the National Park

- 8.14 It is agreed that the site is within the setting of the National Park. According to NPPF para 182, great weight should be given to conserving and enhancing the landscape and scenic beauty in National Parks, which have the highest status of protection in relation to these issues.
- 8.15 It is agreed that the requirement to give "great weight" to conserving and enhancing landscape and scenic beauty 'in' National Parks extends to proposals for development within the setting of the National Park.
- 8.16 It is agreed that paragraph 182 does not preclude development in the setting of the National Park. It requires that development is sensitively sited and designed to avoid or minimise adverse impacts on the designated area.
- 8.17 It is agreed that if there is residual harm then this does not automatically mean that the proposals do not accord with NPPF paragraph 182. Instead NPPF paragraph 182 requires the decision maker to weigh any identified harm with all the benefits of the development and reach a judgement on whether the benefits outweigh any such harm.

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- 8.18 It is agreed that national policy has not changed on this issue since the last inquiry.
- 8.19 It is agreed that the site and the appeal proposals remain unchanged and there is nothing else that has changed which would result in a lesser or greater impact on the setting of the National Park.
- 8.20 It is agreed that the legal challenge did not create a new legal precedent on such matters. The legal error was the failure to clearly address any harm to the National Park in the planning balance.
- 8.21 It is agreed that Local Plan policy SS4 does not add anything beyond that which is set out in NPPF §182 insofar as the effects of development on the National Park is concerned.

Spatial Strategy

- 8.22 It is agreed that the Court of Appeal was satisfied that Inspector Cridland had dealt with the then emerging spatial strategy and there was no error in this regard. However, the parties disagree on the weight to be afforded to these findings.
- 8.23 It is agreed that Inspector Cridland concluded that the proposals were not so substantial, or its cumulative effect so significant, that granting permission would undermine a fundamental aspect of the then emerging Local Plan's strategic balance [IR.§29]. However the parties disagree on the weight to be afforded to these findings.
- 8.24 It is agreed that the Spatial Strategy of the then emerging Local Plan was not materially different to that of the now adopted Local Plan.

Local Green Gap

- 8.25 It is agreed that the appeal site is now designated along with other land at Chatsmore Farm as part of a Local Green Gap.
- 8.26 It is agreed that Chatsmore Farm taken as a whole is not the appeal site.
- 8.27 It is agreed that the Local Green Gap does not preclude housing development.
- 8.28 It is agreed that Inspector Cridland found that:-

42 However, while it is clear that the introduction of the proposed scheme would have an urbanising effect on the site itself and would diminish the sense of separation between Goring-by-Sea and Ferring, the illustrative masterplan indicates that most of the built form would be located towards the southern end of the site, in a location where it is clear, both from the aerial photographs submitted and on the ground that a merging of the settlements has already taken place. This would limit the overall visual impact and with around 14ha of land remaining open and undeveloped, I do not consider the physical or visual separation of the settlements would be undermined.

43. Accordingly, while I acknowledge the appeal site is of landscape and amenity value to the local community, and that its loss would result in some harm in this respect, I am not persuaded that the proposed development would materially undermine the landscape value of the 'gap'.

8.29 However, the parties disagree on the weight to be afforded to these findings.

The now superseded WCS Policy 13

8.30 It is agreed that Core Strategy Policy 13 that applied at the time of the previous appeal decision precluded housing on unallocated sites if:-

- it was a greenfield site
- it was located outside the defined built up area, and
- Unless such sites had been considered through a Plan Review

8.31 It is agreed that Policy 13 was more restrictive than Local Plan Policies SS1 and SS4 but the LPA says that the Inspector's findings that the conflict with that policy was part of his overall consideration of the issues, which acknowledged that policy13 was adopted in 2011, when the local policy context considered all of Worthing's development requirements could be delivered within the existing built-up-area boundary and in circumstances where the appeal site was not designated as a local gap, which is no longer the case.

8.32 It is agreed that Inspector Cridland still afforded Policy 13 full weight.

Accessibility

- 8.33 It is agreed that the site is located in a sustainable location in terms of accessibility to local shops and services and given the opportunities to travel on foot, cycle and public transport.

Highways and Access

- 8.34 It is agreed that (subject to satisfactory planning obligations and planning conditions) the proposals would not have an unacceptable impact on highway safety and that the residual cumulative impacts on the road network would not be severe.
- 8.35 It is agreed that (subject to satisfactory planning obligations and planning conditions) the appeal proposals could provide for safe and suitable means of access for all users.
- 8.36 It is agreed that (subject to satisfactory planning obligations and planning conditions) the opportunities for sustainable transport modes have been taken up.
- 8.37 It is agreed that (subject to satisfactory planning obligations and planning conditions) the site is suitably located in relation to local services and facilities.
- 8.38 It is agreed that the LPA is no longer pursuing an objection on traffic or transportation grounds.
- 8.39 It is agreed that Inspector Cridland rejected the LPA's previous highway objections. He did not consider the residual cumulative impact would be severe. Instead, he considered the overall picture would be one of improvement [IR.69].

Master Planning

- 8.40 It is agreed that the planning application was submitted in outline with access, layout, appearance, scale and landscaping of the development reserved for future consideration.
- 8.41 It is agreed that conditions can be used to require future RM applications to be in general accordance with the Illustrative Masterplan to ensure that the main design principles are secured at the outline stage (if considered necessary).

Heritage and Archaeology

- 8.42 The parties now agree on the likely effects of the development on the significance of nearby heritage assets. The level of harm is identified in the Heritage Statement of Common Ground.
- 8.43 It is agreed that the public benefits would outweigh the identified harms in accordance with NPPF paragraph 208.
- 8.44 It is agreed that the Heritage Statement of Common Ground remains applicable and that National Policy remains as before (save for the changes to paragraph numbers in the revised NPPF).

Housing Mix

- 8.45 It is agreed that the proposals could provide for an appropriate mix of house types, sizes and tenures. This can be agreed at a later stage.

Ecology

- 8.46 It is agreed that subject to securing acceptable mitigation through conditions, the proposals will not have an unacceptable impact on protected species and or habitats within the site.
- 8.47 It is agreed that off-site mitigation for nesting birds can be secured through a completed Section 106 Agreement.
- 8.48 It is agreed that proposals also present opportunities for biodiversity net gain [at least 10%] and would lead to an ecological enhancement compared to the rural habitats that exist.

Affordable Housing

- 8.49 It is agreed that the Appellants propose to deliver 40% affordable housing. This is consistent with the affordable housing requirement in Policy DM3 of the Worthing Local Plan.

Internal Accessibility Standards

- 8.50 It is agreed that the appeal proposals would now exceed normal requirements for internal accessibility standards and that this would be a benefit of the appeal proposals.
- 8.51 It is agreed that the Appellant is proposing 3% of market housing as Part M4(3) compliant to match the policy of affordable homes. All of the units (market and affordable) will be Part M4(2).

Carbon Zero Homes

- 8.52 It is agreed that the commitment to carbon zero homes is an added benefit of the appeal proposals and responds positively to the LPA's objectives for climate change. This can be secured by condition.

Market Homes for local people

- 8.53 It is agreed that the Appellant's offer to give priority to local people through a cascade mechanism in the s.106 is an added benefit and will assist in addressing the local housing need [applicable to 40% of the market housing].

Public open space

- 8.54 It is agreed that the appeal proposals provide public open space in excess of the LPA's minimum requirements for residential development.
- 8.55 It is agreed that there are currently two public rights of way within the appeal site.
- 8.56 It is agreed that any acceptable management or maintenance of the public open space can be secured through s.106 planning obligations.

Public Rights of Way

- 8.57 It is agreed that the LPA does not object on the basis of any loss or diversion of public rights of way.

Trees and Hedgerows

8.58 The acceptability of the loss of any trees or hedgerows will be considered at the reserved matters stage. No objections are raised at this outline stage.

Agricultural Land Quality

8.59 The LPA does not object to the appeal proposals on the basis of any unacceptable loss of agricultural land.

Flood Risk and Drainage

8.60 It is agreed that the majority of the appeal site (and all of the areas of the built parts of the development) is located within Flood Zone 1 (the zone with the least probability of flooding).

8.61 It is agreed that there is no objection to the proposal on grounds of flooding and surface water matters, subject to the imposition of conditions.

8.62 It is agreed that the proposals will incorporate on-site SuDS features which will attenuate the surface water.

Benefits

- 8.63 It is agreed that the benefits of the appeal scheme will include the following:-
- a. The provision of additional open market housing for which there is an exceptional need.
 - b. The provision of affordable housing for which there is a substantial unmet need
 - c. Biodiversity net gain
 - d. Construction jobs in the short term
 - e. provision of a local centre
 - f. other related benefits to the local economy
 - g. increased car parking for Goring Railway Station

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- h. improvements to the local highway network
 - i. financial contributions
 - j. the promotion of sustainable modes of transport
 - k. provision of public open space and play areas
 - l. Commitment to enhanced accessibility standards
 - m. Carbon Zero Homes
 - n. Homes for local people

8.64 The parties agree that these are benefits of the scheme but they have different opinions on the weight to be afforded to each of them.

8.65 The weight to be afforded to the following benefits is however agreed:-

- a. Delivery of market housing – at the uppermost end of the scale (the LPA defines this to be substantial the appellant defines this as very substantial).
- b. Delivery of affordable housing - at the uppermost end of the scale (the LPA defines this to be substantial the appellant defines this as very substantial).

8.66 The Appellant says that there are other benefits that (as set out in the Planning PoE) but the LPA does not agree.

9. MATTERS THAT REMAIN IN DISPUTE

NPPF paragraph 182 – National Park

- 9.1 The LPA does not consider that the proposed development is sensitively located or designed to avoid or minimise adverse impacts on the SDNP. The LPA considers that the harm caused to the landscape and scenic beauty of the SDNP should be afforded great weight and provides a clear reason for refusing permission. The benefits of the scheme do not outweigh the harm to the SDNP
- 9.2 The Appellant says that NPPF paragraph 182 does not preclude such harm, but any such harm will need to be weighed against the benefits of the development.
- 9.3 The Appellants says that even if there is harm, the benefits outweigh that harm even taking account of the fact that NPPF paragraph 182 increases the weight to be afforded to any such harm.
- 9.4 The Appellant considers that there is no reasonable justification for the LPA changing its position on whether the tilted balance is disapplied because of NPPF paragraph 182. The position was previously agreed that the tilted balance was not disapplied and nothing has changed to justify the LPA's changed position.
- 9.5 The LPA's further consideration of this issue since the previous appeal has led it to form the judgment that the harm to the SDNP is such as to trigger footnote 7 as paragraph 182 provides a clear reason for refusing permission in light of the harm to the SDNP.

Spatial Strategy

- 9.6 The Appellant says that it is both relevant and important that Inspector Cridland dealt with the then emerging spatial strategy and that the Courts found no error in this regard.
- 9.7 The LPA says that the previous Inspector attached only limited weight to the emerging Local Plan given that it was unclear at the time what form the final policy would take. Since the previous appeal, the new Local Plan has been adopted.
- 9.8 The Appellant says that it is both relevant and important that Inspector Cridland concluded that the proposals were not so substantial, or its cumulative effect so

significant, that granting permission would undermine a fundamental aspect of the then emerging Local Plan's strategic balance [IR.§29]. That is because the most important policies are now out of date and the appeal proposals are to be considered against the same spatial strategy.

9.9 The LPA says that the previous Inspector's findings at para 29 related to the issue of whether the appeal scheme was premature in light of the then emerging Local Plan. Those findings are no longer relevant given that the Local Plan has now been adopted and there is no issue relating to prematurity.

9.10 The Appellant says that it is relevant and important that the Local Plan Inspector did not change the course of the Local Plan Examination following receipt of the (now quashed) appeal decision. The Appellant says that this again shows that the appeal proposals would not disrupt the overall spatial strategy.

9.11 The LPA say that the LP Inspector considered that the appeal site should be designated as a Local Green Gap and that the LGGs were fundamental to the Plan's spatial strategy. He rejected a submission made by the appellant in the main modification consultation that he should reconsider the LGG designation in light of the previous Inspector's decision to allow the appeal on the basis that his conclusions had already taken account of the potential housing development (i.e. the appeal scheme) on the site (para 64), which the appellant had raised extensively in its representations on the Local Plan.

Local Green Gap (Policy SS5)

9.12 The LPA says that the proposals conflict with Policy SS5.

9.13 The Appellant says that the proposals do not conflict with Policy SS5.

9.14 The Appellant says that it is relevant and important that Inspector Cridland did not consider that the physical or visual separation of the settlements would be undermined by the appeal proposals [IR.42]. That is because the Inspector considered the proposals against what is now adopted policy and the Courts found no error in his approach to the Gap issues.

9.15 The LPA says that the previous Inspector's conclusions should be read as a whole and included findings that are difficult to reconcile.

9.16 The Appellant does not agree that the findings on the gap issue are difficult to reconcile and would note that the appeal decision was not quashed on this basis. The LPA's challenge on the gap issue (Ground 1) did not succeed.

WCS Policy 13

9.17 It is agreed that Inspector Cridland afforded that policy full weight to Policy 13 even though it was out of date [IR.33 and 82] but the LPA says that this is now irrelevant.

9.18 The Appellant says it is relevant because the Inspector afforded full weight to a policy of absolute restriction and yet still considered this to be outweighed by the benefits of the proposal.

9.19 It is agreed that the now adopted Local Plan allocates greenfield land for housing beyond the built area defined by the Core Strategy, such that it was necessary to release land that would previously have conflicted with Core Strategy Policy 13. The LPA says that this demonstrates the efforts the LPA has made to meet as much of its housing need as possible while also protecting those areas that are worthy of protection. This approach was endorsed by the LP Inspector

9.20 The Appellant says that it is relevant as it shows that the LPA needed to release land adjacent to the former built up area to help address its housing requirement and that the release of the appeal site would be similar in spatial planning terms.

Transfer of land at Manor Farm

9.21 The Appellant says that the transfer of land at Manor Farm will secure the long term future of this land as open undeveloped gap which can also be used by the LPA to secure landscape and biodiversity enhancements for the Borough.

9.22 The LPA does not consider this proposal to be directly related to the development or necessary so as to comply with CIL Regulation 122

The Appellant says that it could also be used as land for BNG that can unlock other allocated sites and windfall sites and enable those sites to maximise their development potential for housing by providing an alternative to on-site BNG provision. The LPA does not consider this proposal to be directly related to the development or necessary so as to comply with CIL Regulation 122.

The Planning Balance

- 9.23 The LPA says that the proposals do not accord with the Development Plan and the appeal should be dismissed.
- 9.24 The LPA says that NPPF paragraph 182 alone provides a clear reason for refusal in any event.
- 9.25 The LPA says that even if the tilted balance is not dis-applied in this case, the adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits such that the appeal should be dismissed.
- 9.26 The Appellant says that the appeal proposals pass the NPPF paragraph 182 test such that this does not represent a clear reason for refusal, as was previously agreed.
- 9.27 The Appellant says that the proposals accord with the Development Plan by virtue of Local Plan Policy SP1 (and they accord with NPPF 11dii) because the adverse impacts of granting planning permission do not significantly and demonstrably outweigh the benefits.
- 9.28 The Appellant says that the benefits of the development outweigh the conflict with the Development Plan even in an unweighted planning balance.

10. PLANNING CONDITIONS AND OBLIGATIONS

- 10.1 An agreed set of updated conditions will be provided for the Inspector before the start of the Public Inquiry.

- 10.2 The Appellant will also present updated deeds pursuant to Section 106 of the Town and Country Planning Act which will secure any planning obligations that are deemed necessary to make the development acceptable.

MIXED USE DEVELOPMENT COMPRISING UP TO 475 DWELLINGS ALONG WITH ASSOCIATED ACCESS, INTERNAL ROADS AND FOOTPATHS, CAR PARKING, PUBLIC OPEN SPACE, LANDSCAPING, LOCAL CENTRE (USES INCLUDING A1, A2, A3, A4, A5, D1, D2, AS PROPOSED TO BE AMENDED TO USE CLASSES E, F AND SUI GENERIS) WITH ASSOCIATED CAR PARKING, CAR PARKING FOR THE ADJACENT RAILWAY STATION, UNDERGROUNDING OF OVERHEAD HV CABLES AND OTHER SUPPORTING INFRASTRUCTURE AND UTILITIES (OUTLINE WITH ALL MATTERS RESERVED)

FINAL

STATEMENT OF COMMON GROUND ON HERITAGE MATTERS

between

PERSIMMON HOMES THAMES VALLEY

and

ADUR AND WORTHING COUNCIL

**LAND NORTH-WEST OF GORING RAILWAY
STATION, GORING STREET, WORTHING, WEST
SUSSEX**

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)

STATUS: FINAL

DATE: 21.12.21

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1. INTRODUCTION

- 1.1 This Statement of Common Ground (SoCG) is prepared on behalf of Persimmon Homes Thames Valley (the Appellant) following the refusal of planning permission by the Local Planning Authority (LPA), Adur and Worthing Council, for an outline application for mixed use development at land north-west of Goring Railway Station, Goring Street, Worthing, West Sussex.
- 1.2 This Statement concerns matters relating to heritage.

2. AREAS OF AGREEMENT

- 2.1 It is agreed that the analysis given in the Pegasus Heritage Statement (P19-3046) dated August 2020 is fair.
- 2.2 The following levels of harm are agreed:


Asset	Level of Harm
Highdown Garden (as a Conservation Area and Grade II* Registered Park and Garden).	Negligible, less than substantial at the very lowermost end of the spectrum
Grade II Listed Jasmine and Clematis Cottages.	Negligible, less than substantial at the very lowermost end of the spectrum
Grade II Listed buildings comprising North Barn.	Negligible, less than substantial at the very lowermost end of the spectrum
Highdown Hill Camp Scheduled Monument.	No harm
Grade II Listed Hightiten Barn.	No harm

- 2.3 It is agreed that this SOCG relates only to matters of heritage. Issues relating to landscape are covered in evidence produced by the parties.

3. AREAS OF DISAGREEMENT

- 3.1 No significant areas of disagreement exist between the parties with regards to heritage matters.

SIGNATURES

Signed: 

Name: Mr Richard Small

Position: Design & Conservation Architect, Adur & Worthing Councils

Date: 21/12/21

For and on behalf of Adur and Worthing Council
as the Local Planning Authority

Signed: 

Name: Gail Stoten

Position: Executive Director (Heritage), Pegasus Planning Group

Date: 21/12/21

For and on behalf of Persimmon Homes Thames Valley
as the Appellant