



The countryside charity
Sussex

CPRE Sussex
Brownings Farm
Blackboys
East Sussex TN22 5HG
Telephone 01825 890975
info@cpresussex.org.uk
www.cpresussex.org.uk

Gary Peck
Worthing Council
Worthing Town Hall
Chapel Road
Worthing
West Sussex
BN11 1HA

11th October 2020

Dear Mr Gary Peck

AWDM/1264/20 Mixed Use Development at Land North West of Goring Railway Station, Goring Street, Worthing

This is the formal response of CPRE Sussex, countryside charity, to the above application. CPRE Sussex works to enhance, promote and protect the Sussex countryside and the ability of local communities to enjoy and value the natural world. CPRE objects to this application for the following reasons;

1. The development lies within the 'Green Gap.'



Chatsmore Farm (Protected Area 2)

Regulation 18 | Map Extract Supporting Document

The development is contrary to the Core Strategy 2011 and the emerging Worthing Local Plan Regulation 18 2018 because the site lies outside of the built up area boundary and within the Chatsmore Farm Local Green Gap.

The emerging Worthing Local Plan says at paragraph 2.48 *"The designation and protection of 'Local Green Gaps' helps to avoid coalescence and preserve the separate characters and identities of different settlements by providing physical and visual breaks. This is particularly important given the compact nature of Worthing and how few and fragile the breaks in development are on the coastal strip between Brighton and Chichester".*

To promote, enhance and protect a thriving countryside for everyone's benefit

President: Lord Egremont

Campaign to Protect Rural England Sussex Branch CIO | Registered charity number: 1156568

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Paragraph 2.50 says *“These areas are open and either undeveloped or a managed landscape for recreational use. They create a sense of travelling between urban areas and form a critically important component of Worthing’s landscape setting”* and paragraph 2.55 says that the *“Landscape and Ecology Study of Greenfield Sites (2015 & 2017) - found the Goring/Ferring gaps to be the most environmentally sensitive areas of those tested and the least suitable for development”*.

Policy SP5 of the emerging Worthing Local Plan identifies Chatsmore Farm as one of four designated as Local Green Gaps between the settlements of Worthing & Ferring and Worthing & Sompting/Lancing, and says they *“will be protected in order to retain the separate identities and character of these settlements. Within these areas any development permitted must be consistent with other policies of this plan, and must not (individually or cumulatively) lead to the coalescence of settlements”*.

Paragraphs 2.69 – 2.73 identify the special characteristics of Chatsmore Farm which justify its inclusion as a Local Green Gap. In summary, these include its historic associations, open views to/from the South Downs National Park, wildlife and recreational value, and its offer as a haven of relative calm within the urban area. These paragraphs are important to the consideration of the proposed development on this site and are reproduced in full below.

- “2.70 Chatsmore Farm plays its part in the historic landscape. It is in the setting of the South Downs National Park which lies just north of the A259 Littlehampton Road. Within the National Park, directly north of Chatsmore Farm, is the Grade II* Registered Park and Garden ‘Highdown Garden’ which is also a Conservation Area, and to the northwest of this the Scheduled Ancient Monument ‘Highdown Hill Camp’. Chatsmore Farm can be viewed from Highdown Hill and its hill fort. It is important to their setting as it gives a sense of the past relationship between their hill location, the coastal plain surroundings, and ultimately the sea. If Chatsmore Farm were to be developed, it would mask the visual transition between Downs, coastal plain and sea and would harm the setting of historic and landscape assets.*
- 2.71 Seen from the hilltop, Chatsmore Farm also forms an effective gap in the view of development along the coastal plain. Chatsmore Farm covers 28ha in Worthing borough (and 2ha in Arun District). It is surrounded by housing on three sides and separates the settlements of Goring and Ferring. The land itself has clear boundaries with a railway line abutting the south side, the A259 forming the north and east boundaries, and housing abutting the west. The transition between settlements is experienced when travelling east/west whether along the A259 or by train. These views are important to maintain for their historic contribution to our sense of place.*
- 2.72 Chatsmore Farm itself comprises arable fields with the Ferring Rife flowing east to west crossing the middle of the site, and a line of pylons running just south of the Rife. Despite the presence of the pylons the Landscape and Ecology Study of Greenfield Sites (2015 & 2017) concludes that the majority of this site (excluding the south-west corner) has substantial sensitivity and value. It also found that the Ferring Rife, with its corridor of semi-natural habitats and wider connectivity, contributes to the area having a*

substantial ecological value. Data held by the Sussex Biodiversity Record Centre adds weight to this view. It records Biodiversity Action Plan Priority Species, notable birds (that are particularly scarce or vulnerable to development in Sussex), bats, rare species and protected species in/around Chatsmore Farm. In addition, their officers have recently surveyed Chatsmore Farm and their initial conclusion is that areas around the Ferring Rife could meet the criteria for designation as a Local Wildlife Site. Further work is to be undertaken which may mean that the existing Ferring Rife and Meadows Local Wildlife Site is expanded to include part of Chatsmore Farm. Local opinion submitted during the Issues and Options consultation is that any development in the gaps between Goring and Ferring would impact negatively on wildlife and biodiversity.

- 2.73 *Chatsmore Farm is easily accessed. There is a link from Goring-by-Sea railway, and there are footpaths running along the southern boundary and part of the western boundary. The Goring Residents' Association also note that there are informal footpaths along the Ferring Rife that allow local people to walk and exercise their dogs. It must be remembered that although the South Downs National Park is not far away, it is located on the other side of a busy dual carriageway, which means that Chatsmore Farm is much more accessible to the local community it serves. Furthermore, the National Park Authority has undertaken an analysis of access to natural green space in the sub-region around the South Downs (July 2014) which concluded that the urban areas of the coastal towns all have low provision of accessible green space, with Worthing cited as one of the most poorly served areas. Chatsmore Farm is therefore an important area of accessible green space notwithstanding its proximity to the South Downs. Comments received during the Issues and Options consultation demonstrated that the gap is valued, in its entirety, for the contribution it provides for health and well-being".*

2. Drainage & Flood Risk

It is noted that the authority's Technical Services are broadly accepting the FRA proposals for drainage. However, they request that, should the outline application receive approval, further wintertime borehole testing is required to understand groundwater levels and impacts of rising groundwater on the proposed development and particularly for the use of SuDs attenuation (to 'lessen' flows into the Ferring Rife compared with current greenfield run off rates.)

The groundwater levels provided in the FRA were from records in 2014 and taken during the dry months of September and October 2014 The consultant stated:-

"It is recommended that a further winter groundwater monitoring regime is undertaken in order to determine the variation in groundwater through different seasons and that test trenches are dug to investigate the practicality of construction." **See FRA page 155**

Much of the coastal plain which this site sits within has groundwater issues which now repeatedly arise with the ever-increasing extreme weather winter events. These are clearly attributed to climate change and extreme weather of up to 1/100 year events have taken place in five of the last eight winters.

Chatsmore Farm sits within an area of up to >75%a groundwater flood risk area where ground water levels are either at or very near within 0.025m of the ground surface.

See attachment and link for Adur Worthing Groundwater Flood Risk Maps:-

<https://www.adur-worthing.gov.uk/media/Media,157943,smxx.pdf>

Whilst the Lead Drainage Authority, Local Authority and Environment Agency do not have records of flooding on this site, this does not mean that there have not been issues. Rising groundwater could be a major contributor to any issues, coupled with that, the 'brick in bucket of water' effect of building 475 homes and infrastructure could worsen any rising groundwater problems. For this reason, testing for groundwater levels after outline planning approval could well be like 'shutting the gate after the horse has bolted'.

We feel that this application should not be placed before planning committee before it can be shown with winter testing that with the above groundwater conditions, the site drainage is sustainable for the lifetime of the development.

Depending on the outcome of those tests, does this development need to have undergone an exception test? If so, the following NPPF para 160 applies.

*"160. The application of the exception test should be informed by a strategic or site specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage. For the exception test to be passed it should be demonstrated that: a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and b) **the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.**"*

Finally, the intention is to drain all surface water flows into the Ferring Rife which outfalls through tidal flaps into the sea. The Environment Agency has been consulted and it is understood their data has been used regarding future rises in sea level using the Truflow modelling software. With the well documented accelerating sea level rise due to climate change, it would be useful if within their comments, before a planning decision is considered, the Environment Agency could show their expectations on sea level rise over the lifetime of the development and that with the tidal flaps closure, twice daily, the site and areas around will be drainage sustainable – despite the increasing length of time for closure of the tidal flaps as sea level rises.

3. Impact on the 'setting' of the South Downs National Park (SDNP)

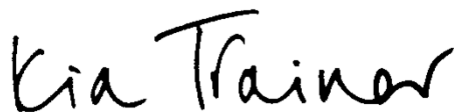
We are concerned that the application will impact the setting of the SDNP and its special qualities, including dark night skies as the southern boundary of the park lies just to the north of the application site. Case law shows that such matters are material considerations in the determination of applications.

For the above reasons it is considered that the development of Chatsmore Farm with 475 dwellings would:

- harm the setting of the historic and landscape assets of the Grade II* Registered Park and Garden 'Highdown Garden' which is also a Conservation Area, and the Scheduled Ancient Monument 'Highdown Hill Camp';
- harm the setting of the South Downs National Park
- reduce the gap in the view of development along the coastal plain which is important to maintain for its landscape sensitivity and historic contribution to the sense of place;
- impact negatively on wildlife and biodiversity especially in the Ferring Rife; and
- reduce the amenity of the footpaths running along the southern boundary and part of the western boundary of the site.

The application should therefore be refused outline planning permission.

Yours sincerely,

A handwritten signature in black ink that reads "Kia Trainor". The script is cursive and fluid, with the first letters of "Kia" and "Trainor" being capitalized and prominent.

Kia Trainor
Director, CPRE Sussex