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| Date received | |

Submission Draft Worthing Local Plan January 2021

Regulation 19 (Publication Stage) Comments Form

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

How to submit your comments

This response form has two parts:

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

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

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| Forms must be returned by the latest 5pm Tuesday 23rd March 2021 |
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You can complete this form on-line: www.adur-worthing.gov.uk/worthing-local-plan

Or return a hard copy of the form:

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

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

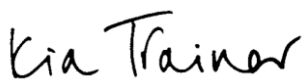
Further guidance

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

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

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

| Part A - Contact Details | | | |
|--------------------------|--|-----------|--------------|
| First name | Kia | | |
| Last name | Trainor | | |
| Organisation | CPRE Sussex | | |
| Address line | Brownings farm | | |
| Address line | Blackboys | | |
| Town | Uckfield | | |
| Postcode | TN22 5HG | Telephone | 01825 890975 |
| Email | info@cpresussex.org.uk | | |

| | | | |
|--------|---|------|----------|
| Signed |  | Date | 22/03/21 |
|--------|---|------|----------|

| | | |
|--|----------------------------------|--|
| Note: Unless you request otherwise <i>(by putting a cross in the box to the right)</i> , all respondents will be added to the Worthing Local Plan consultee database and will be notified at all subsequent stages of Local Plan progression. | No: please don't add me | |
|--|----------------------------------|--|

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|---|--|
| In addition, if you would like to subscribe to the Worthing Planning Policy Newsletter (which covers a wide range of Planning Policy issues) then please put a cross in this box: | |
|---|--|

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

Part B
Please use a separate sheet for each representation

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

Policy

A13 Titnore
Lane

Paragraph

Map
Extract

Do you consider the Submission Draft Local Plan:

Legally compliant?

Yes

☒

No

Don't know

Sound?

Yes

No

☒

Don't know

**Complies with the Duty to
Cooperate?**

Yes

☒

No

Don't know

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

We believe that Policy A13, Titnore Lane is not sound because it is not consistent with national policy, enabling the delivery of sustainable development in accordance with the policies within the National Planning Policy Framework (NPPF)

The current Core Strategy Proposals Map shows this land as falling within the West Durrington Strategic Development Area. However, due to environmental sensitivity this land was excluded from the permitted scheme for 700 dwellings currently under construction to the east. We believe that strong reasons for omitting this site from the Local Plan exist.

The cumulative development proposed here and at West Durrington will put significant pressure on the Local Wildlife Site (LWS) complex through recreational disturbance, contrary to para 170 of the NPPF which requires Planning policies and decisions to contribute to and enhance the natural and local environment by protecting sites of biodiversity or geological value. Although the buffer for the ancient woodland is proposed as 20m we have concerns that this is may not be adequate (for example, the Woodland Trust recommends a 50m buffer <https://www.woodlandtrust.org.uk/media/3731/planners-manual-for-ancient-woodland.pdf>) It is vital that there is no severance of the LWS. Para 171 of the NPPF requires that Plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure. This allocation will harm, not enhance, this network.

We are not satisfied that the proposed landscape buffer will adequately protect the 'setting' of the national park, which under NPPF para 172 has the highest status of protection in relation to conserving and enhancing landscape and scenic beauty.

NPPF para 156 requires that Strategic policies should manage flood risk from all sources and consider cumulative impacts in, or affecting, local areas susceptible to flooding,

The West Durrington development area must be looked at on a total catchment area for the flood risk implications. The whole area is within an Environment Agency flood risk area with a rating of 3 – **a high probability of flooding** – including this site. Some areas like the Caravan Site (Policy A2) also have high risk of groundwater flooding (see Adur Worthing SWRA map attached).

This site at Titnore lane (Policy A13) the Fulbeck Avenue allocation (Policy A6) and the proposed Caravan site (Policy A2) together with the West of Durrington development all rely upon the Ferring Rife for surface water drainage as do existing developments in Goring and Ferring.

The West of Durrington development has already experienced flooding issues. The Fulbeck Avenue development was approved in October 2020 (AWDM/0166/20) but with an outstanding condition for final committee approval in relation to sustainable drainage because of concerns of the EA, WSCC lead authority and the Adur Worthing Technical services. This condition has still to be discharged, particularly to do with capacity of the Ferring Rife and the integrity of the bund of the neighbouring Somerset Lake which must protect the site from overtopping and causing severe risk to residents. Allocations A2 (The Caravan Club site,) A6 (Fulbeck Avenue) and this allocation (A13) all neighbour onto the Somerset Lake which has a history of overtopping.

If developed, the Titnore lane site will also drain into the Ferring Rife which connects with the Somerset Lake and inevitably add flows to the many sites downstream including those noted above.

CPRE Sussex identifies that considerably more work has to be done on a total catchment basis to validate the drainage sustainability of the Titnore site.

On the evidence so far, we maintain an objection to this allocation.

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

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

We believe that Titnore Lane should be omitted from the plan to ensure soundness through compliance with NPPF paras 170,171, 172 and 156.

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

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

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

Yes

X

NO

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

We would like to contribute to any discussion about this Policy at examination.

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

Signature:

Kia Trainer

Date:

22/03/21

Part B

Please use a separate sheet for each representation

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

Policy

A15 Upper
Brighton
Road

Paragraph

Map
Extract

Do you consider the Submission Draft Local Plan:

Legally compliant?

Yes

X

No

Don't know

Sound?

Yes

No

X

Don't know

Complies with the Duty to Cooperate?

Yes

X

No

Don't know

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

We believe that Policy A15 Upper Brighton Road, is not sound because it is not consistent with national policy, enabling the delivery of sustainable development in accordance with the policies within the National Planning Policy Framework (NPPF)

The site contributes to the landscape and visual setting of the National Park and the open 'gap' between Sompting and Worthing. The NPPF para 170 requires that Planning policies and decisions should contribute to and enhance the natural and local environment by maintaining the

character of the undeveloped coast, while improving public access to it where appropriate. Developing this site would mean the loss of a valuable green gap.

Spatial Policy SS1 (Page 48) states that;

‘ diii) Open Spaces / Countryside / Gaps - valued open space and landscapes outside of the Built Up Area Boundary are protected. This includes important gaps between settlements, the undeveloped coastline and the features which provide connectivity between these areas.’

Sompting Village is less than 150m from this allocation, which means that the eastern boundary of Worthing and Sompting will have effectively coalesced. This development would mean that the important gap between the existing Worthing BUAB and the village of Sompting will virtually cease to exist. This we believe is a failure in terms of Policy SS1.

We do not feel that the cumulative traffic impacts of this allocation have been fully addressed in line with NPPF para 102. There is an emerging substantial traffic increase from application AWDM/0323/19 at Sompting, which is allocated in the Adur Local Plan. Any additional vehicle movements through Sompting village should be avoided in order to preserve the conservation status of Sompting Village and the quality of life of residents from rat running traffic.

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

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We believe that Upper Brighton Road should be omitted from the plan to ensure soundness through compliance with NPPF paras 170 and 102.

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

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

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

Yes

X

NO

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

We would like to contribute to any discussion about this Policy at examination.

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

Signature:

Kia Trainor

Date:

22/03/21

Part B

Please use a separate sheet for each representation

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

Policy

SP1
Presumption
in favour
of
sustainable
development

Paragraph

Map
Extract

Do you consider the Submission Draft Local Plan:

Legally compliant?

Yes

X

No

Don't know

Sound?

Yes

No

Don't know

**Complies with the Duty to
Cooperate?**

Yes

X

No

Don't know

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

We question the need for this policy which appears to merely repeat the NPPF.

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

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This Policy should be deleted as it merely repeats national policy.

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

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

Yes

NO

X

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

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

Signature:

Kia Trainer

Date:

22/03/21

Part B

Please use a separate sheet for each representation

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

Policy

SS1 Spatial Strategy

Paragraph

Map Extract

Do you consider the Submission Draft Local Plan:

Legally compliant?

Yes

X

No

Don't know

Sound?

Yes

No

Don't know

Complies with the Duty to Cooperate?

Yes

X

No

Don't know

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With regard to;

- i) Edge Of Town Sites - six edge of town sites are allocated for development.

Please see our comments in relation to Policy A13, Titnore Lane and Policy A15 Upper Brighton Road.

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

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

Please see our comments in relation to Policy A13, Titnore Lane and Policy A15 Upper Brighton Road.

Continue on a separate sheet/expand box if necessary)

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

Yes

X

NO

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Signature:

Kia Trainer

Date:

22/03/21