

THE GORING AND ILEX CONSERVATION GROUP
Conserving the beauty and present character of Goring, the Ilex Avenue,
the trees in Sea Lane and the Goring Gap

xxxxxxx
xxxxxxx
Worthing
West Sussex
BN12 4QD

xxth xxx 2020

Gary Peck
Planning Services Manager
Portland House
Richmond Road
Worthing
West Sussex
BN11 1LF

Dear Mr Peck,

Re: Land North West Of Goring Railway Station Goring Street

Application No. AWD/1264/20

Proposal: 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)

We are objecting to this outline proposal for the following reasons amongst other observations.

We believe that the application is premature, results in a loss of amenity to not only the immediate area but to the wider community, highway access and traffic congestion, even with future mitigation will be problematic, development and increased light pollution will affect the setting of the National Park and the Highdown Conservation and valued areas and amenities.

The application is premature.

Pegasus seem to make light of the position of Worthing's Draft Local Plan but this has been subject to two public consultations since May 2016 and as far as we understand will be submitted for examination during 2021 following further consultation after the evidence base is updated. There is work to do but the main thrust of the Plan is relatively consistent. Under NPPF Paragraphs 48 and 49 (b), we believe that the emerging Plan carries not insignificant weight in being at an advanced stage more than 4 years since first inception.

We also believe that the Plan and development proposals comply with NPPF Paragraphs 49 (a) and (b) in that the plan making process would be undermined by predetermining decisions of new development that are central to an emerging plan. As one would expect, being the landowners and developers, Persimmon are objecting to the inclusion of the Goring Gaps as Local Green Space and Local Green Gaps. However, with possibly 88% of the timescale completed between first public consultation and the anticipated submission of the final plan for examination, it would seem inequitable to the people of Worthing and the concept of localism to pre-empt the Inspector's decision regarding these Gaps.

The unprecedented effects of the Coronavirus epidemic are already showing changes in working practices, loss of retail and potential loss of office requirements, desire for more indoor and outdoor space and less confidence in and less requirement for public transport. The likely outcome will be to free up more brownfield opportunities and for transport links to become less important. As we are in the midst of the epidemic, it would be prudent to avoid rushing into a greenfield development until the outcomes are more apparent. Housing needs and locations could then be better targeted at the available (new) sites. A rise in

THE GORING AND ILEX CONSERVATION GROUP

Conserving the beauty and present character of Goring, the Ilex Avenue, the trees in Sea Lane and the Goring Gap

unemployment and the financial and social effects on both prospective purchasers, councils and providers of infrastructure may well in both the short and long term affect housing need and provision.

Loss of Amenity.

There are a number of areas where we consider that this will occur and our comments relate in part to the various supporting documents in Pegasus' submission:

Local Green Gap

The conservation of the Green Gaps was recognised in the new Local Plan consultations and 70% of the public responses were regarding the important role of these Gaps. The importance of these Green Gaps to the community is emphasised by the fact that Adur Council is purchasing the farmland at Old Salts Farm, comprising a similar Gap to preserve it for the community – despite it being bounded on the South side by the A259 and housing development, on the West by housing development, on the East by the river then considerable new housing and on the North by the railway and airport with associated buildings.

Built Heritage

Pegasus have identified a number of Grade II listed buildings that may be affected by the proposals. They have, however, forgotten to include Hightiten Barn, also Grade II listed, on the East slopes of Highdown whose views and setting will also be affected. They consider that negligible harm will apply to these areas. This is debatable, especially when the additional street and housing lighting is apparent which will highlight the development. Again, with Highdown Hill Camp, where Pegasus deem no harm, the taller buildings, mass of the development and lighting will adversely affect the setting, whilst the older development south of the railway line is low rise and unobtrusive.

Regarding the world-famous Highdown Gardens, Pegasus describe these as inward facing but do not acknowledge the work going on following the two tranches of lottery fund monies in 2017 and 2019 which, following a public consultation in January 2019, aim to improve the visitor experience including opening up views to the sea. Thus the new views from these important gardens and the effects on the gardens will now be adversely affected by the proposed development.

Drainage

The Ferring Rife has flooded in the past and its capacity is affected by the tides. RGP propose a SuDS system including, amongst other measures, permeable paving ponds and swales to mitigate risk based on a 1 in 100 year critical rainfall event with an allowance for climate change. These events are becoming more common, however with at least 5 major events since 2000 and although the risks to the proposed site are considered the effect of exceptional rainfall following a prolonged wet period, together with a high tide may well result in the Rife overflowing downstream from the site and flooding Ferring.

In 2009, Sir David King, the Government's former Chief Scientific Adviser, said that the 1 in 100 year event when measuring the likelihood of flooding taking place was now obsolete. Climate change has thrown doubt on the way we measure flood risk. If we built flood defences to cope with a 1 in 1000-year event, even that might prove inadequate.

The West Durrington site has been affected by drainage problems and the Northbrook Pond reportedly contaminated. We hope that lessons have been learned are concerned that the proposals are inadequate to allow for the run off from the proposed 60% of the site area being impermeable. The mitigation proposals require a good deal of maintenance to ensure that they continue to operate adequately and we have concerns that over time they will not be maintained as required.

Infrastructure

There is an assumption in the application that infrastructure may be addressed by financial contributions. We would like to note some of the problems that would not be solved by developer contributions.

THE GORING AND ILEX CONSERVATION GROUP

Conserving the beauty and present character of Goring, the Ilex Avenue, the trees in Sea Lane and the Goring Gap

There is a shortage of GPs. The UK has fewer GPs per person than at any time in the last 50 years, according to an analysis in May 2019. The failure of GP numbers to keep up with population growth was highlighted by a second survey showing doctors working, on average, 11 hour days

In January 2019, there were warnings of a growing shortage of dentists, with the number of new recruits falling by a fifth in just two years. Figures show that in total, the number of new dentists working in the UK fell from 2,571 in 2015 to just 1,999 in 2018 - a drop of more than 22 per cent.

In March 2020, Southern Water predicted Sussex water shortages in just ten years and a third of its water sources could be lost within 25 years because of climate change. It had previously warned that, unless action was taken, customer demand would be double available supply by 2030. Sussex has been labelled an area of serious water stress.

A 2020 WSCC report notes that in the last decade West Sussex has experienced a sharp rise in the number of births over those seen in the previous decade leaving a rising number of children who will require entry to primary and secondary school in the future, creating a continuing basic need for additional school places. The Council has responded to this need with a programme of school expansions, predominantly in the primary sector but will there be the teachers for these classes. In March 2020, the Education Policy Institute noted that the teacher labour market in England faces huge challenges and that while pupil numbers in secondary schools in 2019 were the same as in 2007, teacher numbers fell by 7%.

An increase of perhaps 900 or more people in Goring can only increase the pressure on the infrastructure.

Highway Access and Traffic Congestion

The Goring Crossways roundabout and associated A259 is frequently congested outside of peak traffic hours and always through those hours. The addition of 450 to 900 cars would exacerbate the congestion and the current mitigation proposed by WSCC does not take the planning application into account. We note that WSCC consider that the application is incomplete regarding highways proposals and those that are submitted suggest a severe impact on the local highway network. This is also supported by a former member of the Department of Transport in a detailed objection to the scheme.

Other

Further loss of green space.

In the Flood Risk Assessment and other documents, there is mention of an “urban Creep” allowance - which considers the potential for a further increase in the areas of hardstanding impermeable surfacing which may be introduced throughout the design life of the development. We are concerned that this may impact upon the green corridors or other proposed green areas in the outline plan.

Biodiversity

The documents acknowledge that the proposals will adversely impact the skylark population but that alternative provisions will be made on another site owned by the developer. We wonder why that site could not be identified and Persimmon as a developer and housebuilder will naturally wish to develop any sites they possess. Will this mean that the Skylarks are pushed around the area until they run out of space?

We are also concerned that the reports do not appear to consider the effect of high rise buildings, lighting and general development on the birdlife using the southern part of the Goring Gap. Is the proposed green corridor sufficient or too narrow?

Arboriculture

This Consultancy report clearly states that it is a preliminary report and not to form part of a planning application. At this stage, therefore, the full impact of the arboricultural plan is unknown and the concept at this stage should have been discussed with the Worthing Planners before the application was made.

THE GORING AND ILEX CONSERVATION GROUP

**Conserving the beauty and present character of Goring, the Ilex Avenue,
the trees in Sea Lane and the Goring Gap**

Conclusion

We believe that the application is incomplete, has glossed over areas less favourable to the applicant and has undervalued the settings and worth of the existing Chatsmore Farm Gap. There is enough cause for concern regarding traffic flows and effects on the wider amenity and infrastructure for the application to be refused outright and we would urge the Council to take this action.

Yours sincerely

Kathryn Walker
(Chairman)