

Standard Response to Issues Raised in Consultation on the Revised Draft Adur Local Plan 2013

Local Green Gaps

Issues raised through the Recent Consultation Exercise

Concerns were raised about the impact of development on the proposed Local Green Gaps, in relation to Policy RD 5: New Monks Farm; policy RD 6: West Sompting, and RD7: Shoreham Airport.

The Local Green Gaps between Sompting/Worthing and Lancing/Shoreham

This Revised Draft Adur Local Plan 2013 (RDALP 2013) refers to two 'Local Green Gaps' at Lancing/ Sompting–Worthing, and Lancing-Shoreham-by-Sea. These will in part succeed the former 'strategic gaps' identified in the Adur Local Plan 1996.

Background

Strategic Gaps were a feature of the West Sussex Structure Plan from the 1980s. The West Sussex Structure Plan 2001-2016 (West Sussex County Council, 2005) defined a strategic gap as an 'area of largely open land between settlements, listed in the Structure Plan, which helps to maintain the separate identity and amenity of major settlements and prevent their coalescence with each other or with very close small settlements. The boundaries are defined in local plans'. It should be noted that Strategic Gaps were not designated on the basis of landscape quality.

Strategic Gaps were viewed as having strategic importance. The principle was to maintain the settlement pattern and hence the character of the County as a whole. The Lancing-Shoreham and Lancing/Sompting - Worthing Gaps were both identified as strategic gaps in the West Sussex Structure Plan 2001-2016 (Policy CH3).

The Structure Plan also identified Local Gaps – 'areas of open land between smaller settlements, listed in Local Plans, which help to maintain their separate identity and prevent their coalescence' (WSCC 2006).

Although the Structure Plan designated the broad location of these strategic gaps, it made clear that it was for Local Plans (prepared by Districts and Boroughs) to define their precise boundaries through the Local Plan process.

It is important to note, also, that strategic gaps were a local designation rather than national, and as such did not, and do not have the same status as 'Green Belt' (which has its basis in legislation). Furthermore, the boundaries were not 'sacrosanct' but could be amended through the development plan process.

The Adur Local Plan therefore designated the precise boundaries of the strategic gaps within Adur District, and these were enshrined within the adopted plan in 1996.

The current approach to Gaps

Since the adoption of the Adur Local Plan 1996, and the Structure Plan in 2005, there has been a significant change in the approach to planning beyond the local level.

Firstly the South East Plan, adopted in 2009, superseded the West Sussex Structure Plan; as such, Structure Plan policies do not form part of the development plan.

Secondly, the South East Plan did not incorporate the policy tools of strategic or local gaps. (The South East Plan has now been revoked and does not form part of the development plan).

The National Planning Policy Framework (2012) now sets out the Government's planning policies. It contains a core planning principle (to underpin plan making) whereby planning should 'take account of the different roles and character of different areas, promoting the vitality of our main urban areas...recognising the intrinsic character and beauty of the countryside...' (paragraph 17, NPPF 2012).

The important role of the Gaps was identified in the Adur Characterisation Study undertaken by consultants in 2009 (please refer to the LDF page on the Council's web site). This study defined the urban areas as distinct neighbourhoods and the gaps as important in retaining their separation. The Gaps are important features of the overall character of Adur. The study also referred to the Lancing/Sompting – Worthing gap as an ecological and landscape corridor linking the South Downs to the sea.

It is important to recognise that the Worthing Core Strategy (2011) safeguards the remaining area of the gap between Lancing/Sompting and Worthing which is located within Worthing Borough.

Defining Local Green Gaps

As a result of this changing policy background, it has been necessary to reconsider the approach to gaps taken in this emerging Adur Local Plan.

A local policy designation (in addition to a countryside policy) is still viewed as beneficial, in order to prevent the coalescence of Adur's settlements and maintain their separate identity.

However, a change of name is necessary, to reflect that these gaps are no longer 'strategic' (in that they are not defined within any other strategic plan) but have a locally important role. The term 'Local Green Gaps' has, therefore been used.

A number of criteria have been used to define the gaps in the RDALP 2013; these are similar to that used by the West Sussex Structure Plan (2005) as they remain relevant and appropriate. Land identified as Local Green Gaps should have the following properties:

- Open and undeveloped character of land (this does not relate to landscape quality although some areas of gaps may happen to be of good quality)
- Form a visual break between settlements – actual and perceived (from physical development or level of activity)
- Create a sense of travelling between settlements
- Boundaries to follow physical features on the ground taking account of the need to accommodate development requirements of the Plan
- Only include land necessary to secure the objectives of gaps on a long term basis

The starting point for defining the boundary of the Local Green Gaps was the current Strategic Gap boundary in the Adur Local Plan (1996). An assessment has been made as to whether all or part of the open areas between settlements serve the policy function of an open green gap, taking account of the above criteria; the review of the built-up area boundary; the South Downs National Park boundaries; and the need to allocate land for new development to meet the future needs of Adur. Account was also taken of the Urban Fringe Study (2006) and the Landscape and Ecology Study (2012), undertaken to inform the emerging Adur Local Plan. Views from roads, the railway line, public footpaths, Lancing College, the Airport, the National Park and adjacent residential and employment areas have been considered. The edges of the settlements are in most cases clearly defined when seen from the above views. Due to the nature of Adur, and as a result of using these criteria, the majority of Adur's countryside has been designated as Local Green Gap within the RDALP 2013.

Local Green Gap Policy

Policy RD 13: Adur's Countryside and Coast, contains a range of policy requirements that should be applied to development proposals outside of the Built Up Area Boundary (and therefore on land defined as countryside in planning policy terms).

The policy states that:

Outside of the Built Up Area Boundary (and outside of the sites identified in Part Two of this plan) development will only be permitted where the need for a countryside location is essential; it is for quiet informal recreation or the essential needs of agriculture or horticulture, flood management, or is otherwise consistent with this Local Plan (or subsequent DPDs)...

In addition, in those areas defined as Local Green Gap, the following policy test will apply:

... Outside of the strategic sites identified in this Local Plan, Local Green Gaps between the settlements of Lancing/ Sompting–Worthing, and Lancing-Shoreham-by-Sea will be protected in order to retain the separate identities and character of these settlements. Within these areas any development permitted must not (individually or cumulatively) lead to the coalescence of settlements...

Multi-functional benefits of Adur's Local Green Gaps

The fundamental role of the Local Green Gaps, as set out above, is to prevent the coalescence of settlements and helping to retain their individual character and sense of place. They provide a visual break in development and help create a 'sense of place'. The Local Green Gaps also provide a number of other benefits due to the fact that they cover the majority of Adur's countryside and therefore form a significant part of Adur's 'green infrastructure':

- A visual connection between the South Downs National Park and the coast, adding a sense of 'greenness' to the area.
- Landscape benefits – these benefits are explained in another Standard Response but the gaps provide expansive long views north-south and are clearly visible from a number of important viewpoints including from the National Park.
- Ecological benefits – these benefits are also explained in more detail below. However, the sites provide important green links and a wide variety of habitats.
- Flood mitigation – there are a number of drainage channels within the gaps which take surface and ground water out to the River Adur. Parts of the gap also act as functional floodplain in relation to tidal and fluvial flooding.

Conclusion

The RDALP 2013 proposes allocations on the edges of the Built Up Area Boundary on countryside currently defined as strategic gap within the Adur Local Plan 1996. However, the RDALP 2013 proposes that much of the remaining areas of countryside are designated as Local Green Gap, where an additional policy test (set out in RDALP 2013 policy RD13: Countryside and Coast) seeks to avoid development which leads to the coalescence of settlements. It is considered that the proposed Local Green Gap areas maintain that function.