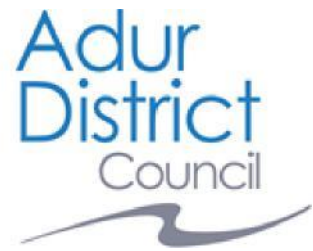


**ADUR DISTRICT COUNCIL  
SUBMISSION ADUR LOCAL PLAN 2016**

**LOCAL GREEN GAPS  
TOPIC PAPER**

**OCTOBER 2016**



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## 1. Introduction

- 1.1 Adur forms part of the coastal Sussex plain. The area is dominated by the South Downs to the north (now designated as the South Downs National Park) and the sea to the south, and the River Adur valley, which bisects the chalk downland and flows across the coastal plain, reaching the sea at Shoreham.
- 1.2 The Adur Local Plan area (outside of the South Downs National Park) lies predominantly across the coastal plain, much of which is developed, other than small areas of countryside between Worthing and Sompting /Lancing, and between Lancing and Shoreham-by-Sea. These open areas create the setting of these settlements and constitute an integral part of their individual identity and character.
- 1.3 The Adur Local Plan designates two 'Local Green Gaps' between Lancing/Sompting and Worthing, and Lancing and Shoreham-by-Sea (Policy 14). These designations are in addition to that land defined as the countryside - that is, land outside of the Built Up Area Boundary (Policy 13). The reasons and justification for this approach are discussed below.<sup>1</sup>
- 1.4 The Council considers that its approach to Local Green Gaps in the Adur Local Plan meets the soundness tests set out in the National Planning Policy Framework (para 182) for Local Plan preparation in that:
  - The Plan has been positively prepared and is consistent with achieving sustainable development in Adur.
  - The approach set out in the Local Plan is the most appropriate for Adur and justified, taking into account its physical size, settlement pattern and constraints.
  - The approach is effective and is deliverable over the Local Plan period .
  - The approach will enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.
- 1.5 The purpose of this Topic Paper is to explain the Council's approach and to provide the background evidence to support it. It should be read in conjunction with:
  - Urban Fringe Study (Baker Associates 2006)

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<sup>1</sup> Please note that the Worthing Core Strategy (2011) safeguards the remaining area of the gap between Lancing/Sompting and Worthing which is located within Worthing Borough. Work has now commenced on a review of the Worthing Local Plan.

- Landscape and Ecological Survey of Key Sites Within Adur Local Plan 2012
- Landscape Study Update 2016

1.6 The Adur Local Plan addresses spatial development and character through delivery of the following policies:

**Policy 2: Spatial Strategy** – sets out the overall spatial strategy for the delivery of development in Adur over the Plan period to 2031. It describes how new development will be distributed in Adur. It guides development within, and adjacent to Adur’s settlements, in order to manage the pattern of development by preventing coalescence, which will help to maintain existing character.

**Policy 10: Sompting** states that Sompting village (that is, the predominantly historic part of Sompting which lies within the conservation area and outside of the Built Up Area Boundary) will not be expanded or intensified due to its linear and historic character, and countryside location within the Local Green Gap.

**Policy 13: Adur’s Countryside and Coast** addresses the management of land uses outside the Built Up Area Boundary, as well as the protection and enhancement of landscape character.

**Policy 14: Local Green Gaps** relates to the defined gaps between Lancing/Sompting –Worthing and Lancing-Shoreham-by-Sea, and that any development in these areas must not lead to coalescence of settlements. (This policy is set out in full below).

**Policy 14: Local Green Gaps**

**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 be consistent with other policies of this plan, and must not (individually or cumulatively) lead to the coalescence of settlements.**

1.7 Although the primary function of the Local Green Gaps is to avoid coalescence (through safeguarding the setting of Adur’s settlements) , they have ‘secondary’ benefits for biodiversity, green infrastructure, flood mitigation and water storage, and include areas of medium or high landscape value, by virtue of their location in the countryside. These issues are addressed in a range of policies within the Adur Local Plan including Policy

13: Adur's Countryside and Coast; Policy 31: Green Infrastructure, Policy 32: Biodiversity, and Policy 37: Flood Risk and Sustainable Drainage.

## **2. National Planning Policy Framework**

- 2.1 The National Planning Policy Framework (NPPF), sets out the Government's planning policies and how these are expected to be applied. It provides a framework "within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities" (para 1). Its key message is a presumption in favour of sustainable development which is described as being a golden thread running through both plan-making and decision-taking. This is set out in para 14 which states that for plan making this means:
- 2.2 Local planning authorities should positively seek opportunities to meet the development needs of their area;
- 2.3 Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole; or specific policies in the Framework indicate development should be restricted.
- 2.4 A footnote (9) to this last point gives examples of where development might be restricted and includes designated Sites of Special Scientific Interest, within a National Park, Local Green Space, designated heritage assets and locations at risk of flooding.
- 2.5 This paragraph makes it clear that local planning authorities should plan positively to meet the development needs of their area and should meet objectively assessed needs **unless there are significant adverse impacts of doing so.**
- 2.6 The Core Planning Principles set out in paragraph 17 include the need to:
- "Take account of the **different roles and character of different areas**, promoting the vitality of our main urban areas, protecting the green belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it."
- "Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling and focus significant development in locations which are or can be made sustainable."

## **3. Context: THE ADUR LOCAL PLAN**

- 3.1 The Local Plan seeks to deliver a package of measures over the plan period in order to:

- Work towards meeting the objectively assessed development needs of Adur as far as possible, taking into account environmental assets and constraints and the capacity of infrastructure (which will also entail working with other local authorities in the sub-region, and possibly further afield);
  - facilitate the regeneration of Adur; and
  - meet the vision and objectives of the Local Plan.
- 3.2 It is intended to achieve this through aiming to balance development in Adur by proactively seeking to meet housing needs, providing employment sites for new or expanding businesses and facilitating the delivery of infrastructure. The plan aims to achieve a balance between providing development whilst also retaining and where possible enhancing Adur's character.
- 3.3 Many of the core principles of the NPPF are reflected in the Vision and Objectives set out in the Local Plan and these have helped shape the spatial strategy for future development in Adur. The Vision and Objectives with particular relevance to Policy 14: Local Green Gaps include the following:

By 2031<sup>2</sup>:

V2: Most development will have been focussed around Adur's main communities - Lancing, Sompting, Shoreham-by-Sea, Southwick and Fishersgate, and measures will have been taken to reduce their impact on the environment. Whilst many of Adur's residents will continue to visit Worthing, Brighton and other centres for employment and some retail and leisure functions, Adur and its town and village centres will continue to have an important role in providing retail, employment, leisure and community facilities, whilst also acting as a destination for visitors. Sompting village will have retained its rural village character.

V7: Adur's character and local distinctiveness (urban and rural, coastal and countryside) will have been maintained and enhanced through protection and enhancement of its landscape, townscape, cultural heritage and biodiversity. Important views will have been protected. Much of Adur's coastline will continue to be used for leisure and recreation, and public access to the river, harbour, countryside and coast will have been improved. Opportunities will be taken to capitalise on Adur's location adjacent to the South Downs National Park.

O6: Adding to natural capital by improving biodiversity, recreation and leisure facilities in order to provide an interlinked network of multifunctional open

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<sup>2</sup> Please note that Proposed Main Modifications to the Adur Local Plan seek to extend the end date of the Plan to 2032.

spaces (within the context of a Green Infrastructure Strategy) - through and from urban areas (including Shoreham Harbour) to the coast and countryside, the provision of open space and greater opportunities for (and access to) informal recreational uses within the countryside and Local Green Gaps. Public access to the National Park and other countryside assets will be improved.

O7: To protect and improve the setting of the South Downs National Park, the character and setting of the River Adur, the coastal waterfront, countryside and the Local Green Gaps, conservation areas and other cultural and historic assets and where appropriate, access to them. Areas of nature conservation value will be preserved and enhanced. New development will avoid impacts on biodiversity and the natural environment as far as possible, and mitigate and/ or compensate where necessary.

### **Historic Context:**

- 3.4 Strategic Gaps were a feature of the West Sussex Structure Plan since the 1980s; and as such, there has been an acceptance of the value of a policy approach designed to avoid coalescence of settlements in the county for some time. 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'.
- 3.5 Strategic Gaps were viewed as having strategic importance. The Lancing/Shoreham and Worthing and Sompting/Lancing Gaps were both identified as strategic gaps in the West Sussex Structure Plan (Policy CH3, West Sussex Structure Plan 2001- 2016).
- 3.6 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' (WSSP 2006, WSCC). It is useful to note that these gaps were not designated on the basis of landscape quality.
- 3.7 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. 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.

- 3.8 However, since the adoption of the 1996 Adur Local Plan, and the West Sussex Structure Plan in 2005, there has been a significant change in the approach to 'wider than local' planning. Firstly the South East Plan, adopted in 2009 superseded the West Sussex Structure Plan; as such, Structure Plan policies ceased to form part of the development plan. Secondly, the South East Plan (itself now revoked) did not incorporate the policy tools of strategic or local gaps. As a result of these factors, it has been necessary to reconsider the approach to gaps taken in the Adur Local Plan. A local policy designation (in addition to countryside policy) is still viewed as beneficial, in order to maintain the separate identity and prevent the coalescence of Adur's settlements. However, a change of name has been made to reflect that these gaps are no longer 'strategic' (in that they are not defined within the West Sussex Structure Plan). The term 'Local Green Gaps' has therefore been used.

*This historic context indicates that the position of the Submission Adur Local Plan with regards to Local Green Gaps is not in itself new and the principles have been tested previously and found to be robust. However, the approach has been fully considered in the light of current national policy and the evidence base for the plan.*

#### **4. Role and Purpose of Local Green Gaps**

- 4.1 Policy 13: Adur's Countryside and Coast seeks to positively manage development in areas outside of the Built Up Area to ensure that in these areas, development will only be permitted where the need for a countryside location is essential, and that Adur's landscape and character will be protected and enhanced.
- 4.2 However, it is considered that a policy designation in addition to Policy 13 is of value in much of Adur's countryside to ensure that development that is otherwise appropriate in the countryside does not contribute to coalescence and therefore the character of Adur's settlements is maintained. Development in these areas, even of uses appropriate to countryside locations could (individually or cumulatively) contribute to the coalescence of Adur's settlements, leading to loss of character and individual identity, and resulting in uninterrupted development of the coastal strip from Brighton to Worthing.
- 4.3 As a result, designated gaps are safeguarded from inappropriate development through an additional policy test set out within Policy 14: Local Green Gaps which states:



**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 be consistent with other policies of this plan, and must not (individually or cumulatively) lead to the coalescence of settlements<sup>3</sup>.**

(This policy test does not apply to any area designated solely as countryside of which there is one small area in Adur, north of the A27).

- 4.4 Retention of gaps in order to maintain the separate identity and prevent the coalescence of Adur’s settlements, and retain a ‘sense of place’ is particularly important given the compact nature of the Adur Local Plan area , the extremely limited open areas between settlements, and Adur’s location within the wider Brighton conurbation. Travelling along the south coast there are few breaks from built development between Brighton and Chichester/ Portsmouth. These breaks in development are particularly evident when travelling east-west along the A27, A259 or the Sussex Coast railway. Those in Adur are particularly ‘fragile’ due to their small size, both in terms of area and width. These areas currently serve to separate the settlements of Worthing and Sompting/Lancing (although Sompting village is located within the countryside and gap area); and separate the Lancing area from Shoreham-by-Sea.
- 4.5 Due to the need to meet objectively assessed needs for development it has been necessary to allocate greenfield land for development on sites formerly within Adur’s countryside<sup>4</sup>. The undeveloped areas between settlements have been assessed and allocations proposed, despite the limited areas available, in order to work towards meeting Adur’s objectively assessed needs. The gaps *have not* been treated as an absolute constraint to development or used to avoid meeting objectively assessed needs for housing. (For more information on Housing, please see the Housing Topic Paper and Housing Implementation Strategy). Chapter 6 of this topic paper discusses why certain parts of the former strategic gaps have been allocated for development).

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<sup>3</sup> Please note that in previous iterations of the Adur Local Plan (Draft Adur Local Plan 2012 and Revised Draft Adur Local Plan 2013) the text now included in Policy 14 was incorporated within Policy 13; Adur’s Countryside and Coast. These elements were separated following responses made to the Revised Draft Adur Local Plan 2013, to ensure that coalescence issues were separated from more general policy relating to appropriate development, character and landscape issues.

<sup>4</sup> The Plan indicates a revised Built Up Area Boundary to accommodate these sites which will therefore lie outside of the countryside and the re-defined Local Green Gaps.

## 5. Defining the Local Green Gaps

5.1 In addition to landscape analysis a number of criteria have been used to define the gaps in the emerging Adur Local Plan; these were based on the criteria used by the West Sussex Structure Plan (2004) to designate the former 'strategic gaps' in West Sussex. Land identified as Local Green Gaps should:

- Have open and undeveloped character of land.
- Form a visual break between settlements – actual and perceived (from physical development or level of activity).
- Create a sense of travelling between settlements.
- Boundaries follow physical features on the ground taking account of the need to accommodate development requirements of the Plan.
- Only land necessary to secure the objectives of gaps on a long term basis should be included.

5.2 It should be stressed that the Local Green Gaps have not been defined on the basis of landscape quality (although gap areas may happen to contain areas of good quality), or due to the fact that they contain historic buildings, or afford attractive and/ or significant views. In addition, the criteria for assessment of Local Green Gaps are different from those used to define the Built Up Area Boundary<sup>5</sup>. (See Appendix 1 regarding the review of the Built Up Area Boundary).

5.3 An assessment has been made as to whether all or part of the open areas between settlements serve the policy function of a Local Green Gap, taking account of:

- The review of the built up area boundary undertaken as part of the Local Plan process.
- The boundary of the South Downs National Park (policies for which are included in the emerging SDNP Local Plan).

5.4 Account was also taken of the Urban Fringe Study (2006) and the Landscape and Ecology Study (2012) and verified by the Landscape Study Update 2016. Due to the compact and constrained nature of Adur, and by using the criteria

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<sup>5</sup> These were made available in the Background Evidence Document 2013 and Built Up Area Review Paper 2012 and 2013

set out above the majority of Adur's countryside has been designated as Local Green Gap.

5.5 These gaps are intended to maintain separation between settlements in Adur and hence to protect their identity and character, based on locally derived objectives and evidence. (Appendix 2 of this Topic Paper refers to existing development in the gaps).

5.6 In addition the Landscape Study Update 2016 described the gaps as being a 'critically important component of the landscape setting (of Worthing, Lancing and Shoreham-by-Sea), contributing to their individual, distinctive character and local identity. (p5)

5.7 The study goes on to note:

"For a landscape to provide an effective landscape setting for a settlement, it must:

- Have distinctive landscape characteristics, which have sufficient depth and interest to provide unique views to and from the fringes of settlements; and
- Enable an experience of travelling through open undeveloped countryside or 'green' open space, as part of the gateway sequence of approach and arrival at a settlement."

For further information please see: Adur Landscape Study Update 2016 Section One, Scope and Purpose.

## **Relevant Evidence**

### Urban Fringe Study (Baker Associates 2006)

5.8 This high level study considered land in Adur's urban fringe in terms of contribution to the general openness and aims of the strategic gaps (as they were at this time) through landscape assessment. The study clearly states that its role was not to redefine the gaps, but to consider whether parts which were not fulfilling their function could be developed without damaging the integrity of the gaps as a whole (para 5.18). The study concludes (para 6.36) that there are only limited opportunities to accommodate development without substantially altering the character, function and performance of the gaps in maintaining visual and physical separation and without detracting from their character to such an extent they cease to become little more than a physical 'break' between development.

5.9 The study highlights opportunities at land west of Lancing (forming part of the New Monks Farm allocation) and a small area adjoining the western boundary of Sompting (the West Sompting allocation).

- 5.10 It should be noted that as the Local Plan process has progressed, this evidence has to some degree been superseded. It is mentioned here to make clear the 'starting point'. The Urban Fringe Study provides the framework for the 2012 and 2016 landscape work (see below) as it identified local landscape character areas. However, the 2012 and 2016 work carried out a more detailed assessment of landscape sensitivity for these character areas.

Landscape and Ecological Surveys of Key Sites within the Adur District (Sheils Flynn and the Ecology Consultancy, 2012)

- 5.11 This work was commissioned to undertake landscape and ecological assessments of greenfield sites in the Adur Local Plan area. It looked at six sites (which had been put forward to the Council by site promoters) and assessed the extent to which development could be accommodated, and the landscape and ecological issues that could be expected to arise. *It did not ascertain/ conclude as to whether the sites were developable.*
- 5.12 This built on the earlier Urban Fringe Study, (using the landscape character areas approach) and included an additional area north of the A27 which was not included in the Urban Fringe Study but lies within the Lancing Gap). It included an assessment of overall landscape sensitivity (assessed for each Landscape Character Area, and set out in the technical appendix), assessment of ecological value of areas within potential allocation sites; establishment of indicative development principles on the sites considered, and concluding assessments of the landscape and ecological impacts of development. The landscape sensitivity assessment approach is based upon advice prepared by the Countryside Agency (now Natural England) and considers strength of landscape character, and condition of local landscapes, in conjunction with visibility and key views. (see section 1.3 of Landscape and Ecological Surveys of Key Sites within the Adur District for full methodology).The study provides evidence needed to determine an appropriate balance between providing new development to meet needs, while maintaining and enhancing the local landscape character and the individual identity of settlements.
- 5.13 Although this study tested development on 6 sites within the gap, it should be noted that this document tested specific proposed schemes and does not in itself allocate sites.

Landscape Study Update 2016

- 5.14 The 2016 Study, also by Sheils Flynn, updates the 2012 landscape work (excluding the ecology elements).

- 5.15 This update ‘tests’ Policies 13 and 14 of the Proposed Submission Adur Local Plan 2014. It also updates the study with reference to the development of the (at that time) recently completed Brighton and Hove Albion Football Academy, and the (then) proposed Shoreham Adur Tidal Walls scheme<sup>6</sup>. The study analyses and ‘tests’ those areas of undeveloped landscape between settlements that is required to retain their separate identity and character. Specifically it:
- Checks the boundaries of the BUAB and LGGs shown on the Policies Map are consistent with the objectives of Policies 13 and 14;
  - Considers the findings of the overall landscape sensitivity study in relation to the specific criteria and objectives of policies 13 and 14;
- 5.16 This study takes careful account of landscape setting and its relationship to sense of place. It states
- “It is this vital sense of space around a settlement that enables us to take stock, assess and understand its relationship to its surroundings. The scale and extent of the space required for an effective landscape setting involves subjective judgement, but it is a judgement that can be informed by objective analysis and evidence from studies of landscape character and sensitivity.” Page 5 Adur Landscape Study Update 2016.
- “This study analyses what this means spatially and considers that the landscape setting of a settlement is an integral component of its individual character and identity. It follows that the Local Green Gap is the area required to provide an effective landscape setting for the settlements on either side of the gap.” Page 6 Adur Landscape Study Update 2016.
- 5.17 The report describes the landscape character, features and edges which define the landscape setting of the gaps, and tests the application of Policy 14 within them. For each gap, the report considers the character of the landscapes which form the landscape setting for the settlements of Worthing, Lancing, Sompting and Shoreham-by-Sea; how these landscapes are perceived and the contribution each part makes to the landscape setting of Adur’s settlements, and the alignment of the BUAB and Local Green Gaps, checking against the boundaries shown in the emerging Adur Local Plan. (see page 8).
- 5.18 Perceived landscape settings are loosely drawn, whereas the boundaries of the Local Green Gaps in the Adur Local Plan and Policies Map are drawn to align with landscape features on the ground such as roads, field boundaries, etc.

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<sup>6</sup> Please note that this scheme now has planning consent; development will commence 2016.

5.19 With regards to the Lancing Shoreham Gap, the study states:

“Figure 8 shows that the landscape setting of Lancing extends right across the entire width of the gap to the east bank of the River Adur, and that the landscape setting of Shoreham extends right across the centre of the gap to Mash Barn Lane and the new football academy. The new football academy and the tall lighting columns around the sports pitches associated with this facility, are visible in views from the riverside at Shoreham-by-Sea; the eastern fringes of Lancing are also visible in the view across the Lancing-Shoreham Gap from Mill Hill, to the north-west of Shoreham.”

5.20 There is an extensive overlap between the landscape settings of Shoreham and Lancing, which covers the central part of the Lancing-Shoreham Gap, demonstrating the value of this zone in contributing to the landscape settings of both towns. While the Lancing-Shoreham Gap clearly does provide a critically important visual break between these settlements, these views, and the continuous urban edge along the coast, suggest that the gap is already critically narrow. There is a risk that further development within the gap, in addition to that allocated in the Proposed Submission Adur Local Plan, would contribute to the coalescence of Lancing and Shoreham-by-Sea”.

5.21 Comparison between the boundary of the Local Green Gap shown in the Proposed Submission Adur Local Plan and Figure 8 (describing the landscape settings of Lancing and Shoreham-by-Sea) suggests that the Local Green Gap boundary is correct because the entire area within the Lancing-Shoreham Local Green Gap contributes to the distinctive landscape setting of either Lancing or Shoreham-by-Sea (or both towns).” (section 2.2 -2.3 Landscape Study Update 2016).

5.22 With regards to the Worthing-Sompting/ Lancing Gap, the study states that:

“There are extensive overlaps between the landscape settings of Worthing, Sompting Village and Sompting/Lancing, which demonstrate the valuable role these landscapes have in contributing to the landscape settings of three settlements. While the Worthing-Sompting Gap clearly does provide a critically important visual break between these settlements, the overlaps between the landscape settings of the three settlements suggests that the Worthing-Sompting Gap is already critically narrow. There is a risk that further development, in addition to that allocated in the Proposed Submission Adur Local Plan, within the gap would contribute to the coalescence of Worthing, Sompting Village and the urban area of Sompting/Worthing”. (section 3.2)

“Comparison between the boundary of the Local Green Gap shown in the Proposed Submission Adur Local Plan and Figure 13 (describing the landscape settings of Worthing, Sompting and Sompting Village) suggests that the Local Green Gap boundary is correct because the entire area within

the Worthing-Sompting Local Green Gap contributes to the distinctive landscape setting of either Worthing, Sompting or Sompting Village (or parts of all three settlements). Figure 13 shows the perceived landscape setting.” (3.3 Landscape Study Update 2016).<sup>7</sup>

- 5.23 As such, it is considered that the Landscape Study Update supports the boundaries of the Local Green Gaps as identified in the emerging Adur Local Plan, and the role this policy plays in safeguarding the character of Adur’s settlements.

#### Assessment of Landscape Sensitivity 2016

- 5.24 This study was commissioned in order to understand the landscape sensitivity of the areas of countryside within the Adur Local Plan area. It was then used to help inform decisions as to the acceptability of development in a number of greenfield locations within the district as well as test the validity of draft policies in the emerging Local Plan. The landscape of the district forms a key part of its character and it is essential that areas that make a strong landscape contribution to the district are not developed.

- 5.25 Landscape sensitivity is assessed through analysis of landscape character sensitivity and visual sensitivity, scored to assess overall landscape sensitivity. (See report for full methodology).

- 5.26 The landscape sensitivity assessment that was an appendix to the 2012 Landscape and Ecology Study was updated in 2016 for the following reasons:

- To rationalise the LCAs which were split by the South Downs National Park;
- To extend the relevant LCAs to cover the whole of the River Adur corridor (the 2012 study used the LCAs identified in the Urban Fringe Study which did not cover this area in full);
- To reassess some of the LCAs to take account of the Brighton & Hove Football Academy Training Ground (which had been built since the 2012 Landscape Study);
- To reassess some of the LCAs having greater regard to their function as Local Green Gaps.

- 5.27 As a result of these considerations, the sensitivity scores for some of the LCAs changed as shown below:

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<sup>7</sup> Please note these are extracts only; for full analysis and conclusions please see the Adur Landscape Study Update 2016

- LCA 4 Adur Gateway (previously titled NE Adur Fringe): The landscape character sensitivity changed from medium-low to medium, the visual sensitivity changed from medium-low to medium-high and the overall landscape sensitivity changed from medium-low to medium-high.
- LCA 5 Lower Adur Marshes (previously titled SW Adur Fringe): The landscape character sensitivity changed from low to medium-high, the visual sensitivity changed from medium to medium-high and the overall landscape sensitivity changed from medium-low to medium-high.
- LCA 6 New Salts Farm: The landscape character sensitivity changed from medium to medium-high and the overall landscape sensitivity changed from medium-low to medium-high. However, it should be noted that the medium-low score in the 2012 study was an error and should have been scored either medium or medium-high.

(Appendix 3 of this Topic Paper indicated how the proposed Local Green Gap boundaries differ from the strategic gap boundaries shown on the Adur Local Plan 1996 Proposals Map).

## **6. Local Green Gaps and the Proposed Strategic Allocations**

- 6.1 As stated in the Adur Local Plan, the need to meet objectively assessed development needs up to 2031 has necessitated an examination of the potential of greenfield sites in Adur.
- 6.2 The Urban Fringe Study identified opportunities and constraints in landscape terms for development in the urban fringe. The contribution of specific areas within the gaps to the landscape and its importance to the gap was assessed in order to consider whether there are parts which were not fulfilling their function and could be developed without damaging their integrity. However, it was not the role of this study to review the specific boundaries of the gaps or the principle of the policy approach. A number of sites on the urban fringe were identified with development potential. This study, in addition to other evidence including the Strategic Flood Risk Assessment and the Landscape and Ecology Study, were used to help inform the locations of the strategic allocations.
- 6.3 A range of sites, including greenfield, were identified through the Strategic Housing Land Availability Assessment (SHLAA) “Call for Sites” exercise and evidence based studies including the Urban Fringe Study. (For more information on the SHLAA please see the Housing Topic Paper). In addition sites have also been assessed against a number of Sustainability Objectives set out in the Sustainability Appraisal of the Adur Local Plan . Where sites have not conflicted with these criteria they have been included in the Flood



Risk Sequential Test and, where necessary, the Exception Test. (See also Flood Risk topic paper, and Sustainability Appraisal).

- 6.4 Following these assessments, greenfield sites at West Sompting, New Monks Farm and Shoreham Airport (see below) have been identified as having the potential to deliver to deliver new homes and/or employment floorspace within the Plan period and have been allocated for development within the Adur Local Plan. The allocation of these sites (formerly within the countryside and Strategic Gap as designated in the adopted Adur Local Plan 1996) demonstrates that the Strategic Gaps have not been used as an absolute constraint or ‘sacrosanct’, but that the Local Plan aims to strike the best possible balance between providing new development to meet the needs of Adur, while at the same time avoiding coalescence in order to maintain and enhance the local character and individual identity of settlements.

**Summary of Landscape Issues for Adur Local Plan Allocations Identified in studies**

<b>West Sompting Allocation</b>	
Urban Fringe Study	<p>Sompting North (north west fringes of Sompting, to west of Dankton Lane, and to south of A27)</p> <p><u>Sompting North</u> falls within Sompting Gap Area 3 in the Urban Fringe Study. It is assessed as having a high contribution to landscape and high importance to the strategic gap.</p> <p>The study concludes that although the area is by no means tranquil, it has an important role in maintaining the integrity of the Strategic Gap and landscape terms and should be protected from development.</p> <p><u>Sompting West</u> Sompting West falls within Sompting Gap Area 1 in the Urban Fringe Study. It is assessed as having a low contribution to landscape and high importance to the strategic gap.</p> <p>The study concludes that while Area 1 makes an important overall contribution to the strategic gap, there may be some scope for small scale developments on the western edge of Sompting and Lancing, which would not have an overall negative effect on the function of the gap.</p>

Landscape and Ecological Surveys of Key Sites within the Adur District 2012

Sompting North (north west fringes of Sompting to west of Dankton Lane, and to south of A27).

The Sompting North area falls within SG Area 3 (NW Sompting Fringe). The visibility analysis shows that only the south east corner of the site is visible (from viewpoint 4 – P30, Technical Appendix); the site has medium overall landscape sensitivity and is generally shielded from views from the National Park by landform on the lower slopes of the Downs. The site is dominated by improved grassland which generally has low ecological value.

The study recommends indicative development principles which include ensuring setting the housing edge back to provide a softer built/landscape interface, rather than a straight north-south built edge.

Summary (table 6.1) states ‘This development could be accommodated with minimal landscape and visual impacts and could be integrated without detriment to the landscape setting of the conservation area.’

Sompting Fringe: southern edge of West Sompting built up area, on the north east fringe of the Worthing-Sompting Gap.

The Sompting Fringe site (SG Area 1: Loose Lane Fields) has a medium-high overall landscape sensitivity.

The development principles state that analysis of views from sensitive viewpoints and the historic field pattern has informed the forms of the blocks of housing, so they can follow the grain of the landscape and ‘elongated block structure’ of the surrounding fields.

Summary, table 6.1 states that ‘Development would result in a slight reduction in the perceived extent of the Sompting strategic gap in some sensitive views from the SDNP but would enhance the existing stark built/landscape interface on the edge of Sompting and would provide much needed public access to the landscapes of the Sompting gap.’

<p>Assessment of Landscape Sensitivity 2016</p>	<p>Land formerly known as Sompting North: this falls within WSG Area 3 (NW Sompting Fringe) and is described as having medium landscape character sensitivity, medium visual sensitivity, and medium overall landscape sensitivity. The visibility analysis (see Figure 9 page 44) indicates that of all the LCAs in the gap, Sompting North appears least visible from assessed viewpoints.</p> <p>The southern part of the allocation, formerly known as Sompting Fringe, forms part of WSG1: Loose Land Fields (and is located adjacent to the existing urban edge of NW Sompting). The study indicates that the areas most vulnerable to change in this LCA are the open expansive scale of arable fields in the centre of the LCA and the transition to a smaller-scale enclosed field pattern on the fringes of Sompting Village. It also points out that the interface of the landscape with the existing urban area of NW Sompting is poor, lacking vegetation to soften the transition, no public access, and lack of integration between buildings and rural surroundings. Overall the LCA as a whole is assessed as having medium-high landscape sensitivity.</p> <p>With regards to visibility, the assessment on page 44 (Figure 9) indicates that there is fairly limited visibility of the majority of the housing allocation in this area, with the remainder being visible from a greater number of viewpoints. Although the LCA is classified as having medium-high overall landscape sensitivity, it must be borne in mind that the allocation relates to only the eastern, less sensitive part of this area.</p>
<p>How has the evidence informed the Local Plan allocation?</p>	<p>While it is recognised that the site is located within a LCA of medium-high overall landscape sensitivity, as explained above in the table, the allocation is in an area of limited visibility from the identified key viewpoints in the landscape studies undertaken in 2012 and 2016, and the study recognises that there is some scope for development within this area. Additionally, development offers some opportunities to improve the current stark interface between existing development and the local green gap. Therefore, taking into account the need to meet the Council's Objectively Assessed Housing Needs as far as is practicable, it was considered appropriate to allocate the land at West Sompting for development.</p>

<b>New Monks Farm Allocation</b>	
Urban Fringe Study	<p>New Monks Farm falls within both Lancing Gap Area 1 and Area 2 of the Urban Fringe Study.</p> <p>Area 1 is described as a having a medium-low contribution to landscape and medium low importance to the Strategic Gap. The study concludes that the west of Area 1 contributes little to the overall integrity of the Strategic Gap whereas the east of the site makes an important contribution to the Gap and the landscape.</p> <p>Area 2 is described as having a medium contribution to landscape and high importance to the strategic gap.</p>
Landscape and Ecological Surveys of Key Sites within the Adur District 2012	<p>This study states that a significant amount of this part of the Lancing Gap has relatively low landscape character sensitivity and is less visible (than other parts of the gap) in sensitive views. The fields between the edge of the urban area of Lancing and Mash Barn Lane contribute little to the landscape setting of Lancing or to the integrity of landscapes within the strategic gap, but the fields to the east of Mash Barn Lane make an important contribution to its sense of openness and greenness, particularly in views from the A27.</p> <p>The study recommends that development on the land to the east of Mash Barn Lane is beyond the natural edge of the gap and will be visible in views from across the gap, from Hoe Court and from the A27. The principal vehicular access junction from the A27 would require careful landscape design so that the 'green' landscape character of the gap is retained and enhanced.</p> <p>Summary: Table 6.1: Development to the east of Mash Barn Lane would be visible in some long views across the Lancing Gap, but the new buildings would be partially screened by new planting and high quality housing/landscape interface would allow a positive relationship between development and the landscapes of the gap, with public access to footpaths and views.</p> <p>This assessment assumes that views to the site from the A27 would be screened by woodland so that there are no detrimental impacts on the perceived scale and 'greenness' of the strategic gap.</p>

<p>A27 – Options for Development Access: Landscape and Visual Appraisal</p>	<p>This study assessed the landscape and visual impacts of two roundabout options associated with allocations at New Monks Farm and Shoreham Airport. The report concluded that the more easterly roundabout proposed by the leaseholders of Shoreham Airport would have greater impacts on the landscape than the more westerly roundabout proposed by the owners of New Monks Farm. This is due to the high sensitivity of the landscape at Shoreham Airport.</p>
<p>Assessment of Landscape Sensitivity 2016</p>	<p>LSG area 1 covers the western section of the proposed allocation at New Monks Farm, and the Brighton &amp; Hove Football Academy. The study states that the narrow strips of fields to the west of Mash Barn Lane contribute little to the landscape setting of Lancing, or to the integrity of landscapes within the gap. Low landscape sensitivity and medium visual sensitivity combine to give an overall landscape sensitivity of medium-low.</p> <p>LSG Area 2 (Saltworks ) covers the area of the proposed country park.(p23 states: ‘...the striking contrast in landscape character between the Saltworks and Shoreham Airport LCAs makes an important contribution to the sense of separation between the towns of Shoreham and Lancing’).</p>
<p>Adur Landscape Study Update – New Monks Farm 2016</p>	<p>The study considers two options for development at New Monks Farm, and provides guiding design principles.</p>
<p>How has the evidence informed the Local Plan allocation?</p>	<p>New Monks Farm falls within two landscape character areas in the 2012 study – LSG area 1 (to the west of Mash Barn Lane) which has low overall landscape sensitivity and LSG area 2 (to the east of Mash Barn Lane) which has medium –low overall landscape sensitivity. While it is recognised that LSG area 2 makes a significant contribution to the Local Green Gap, there is limited visibility for both area 1 and 2 from identified key viewpoints in the district. The 2012 Landscape and Ecology study recognises the need for screening to minimise the impact of the development on LSG area 1. However, it is considered that the site can accommodate development without compromising the function of the gap and without a significant detrimental impact on the landscape.</p>

<b>Shoreham Airport</b>	
Urban Fringe Study	<p>Shoreham Airport falls within Lancing Gap Area 3 in the Urban Fringe Study. This area is described as having a low contribution to landscape and a high importance to the strategic gap.</p> <p>The Urban Fringe study also states that the Airport's 'openness allows sweeping views in all directions with Lancing Chapel and college buildings particularly prominent beyond A27 to the north.'</p>
Landscape and Ecological Surveys of Key Sites within the Adur District 2012	<p>LG3 covers Shoreham Airport. With regard to the LCA's contribution to landscape setting, the study states: 'The extensive open landscape makes a strong contribution to the impression of open, extensive greenspace in the Lancing Strategic Gap, enhancing the sense of separation between Shoreham and Lancing and providing a striking landscape setting for the lower stretches of the River Adur as it winds towards the sea.'</p>
Shoreham Airport proposed development masterplan: Broad overview of landscape and visual issues	<p>This study assessed a proposal for 25,000sqm (10,000sqm larger than the current Local Plan allocation) of new employment floorspace at Shoreham Airport in the north east and north west corners of the site. Due to the high overall landscape sensitivity of the airport, the study concluded that the development proposals are likely to be visually intrusive and even with mitigation in place would be likely to have high impacts on visual sensitivity.</p>
Assessment of Landscape Sensitivity 2016	<p>LSG area 3 covers Shoreham Airport. With regards to the LCAs contribution to landscape setting, it states: 'The extensive green open turf of the airfield makes a strong contribution to the impression of open, extensive greenspace in the Lancing-Shoreham Gap, enhancing the sense of separation between Shoreham and Lancing and providing a striking landscape setting for the lower stretches of the river Adur as it winds towards the sea. The flat, open airfield functions as a spacious green 'forecourt' to the airport buildings and the river Adur, enabling long views across the Lancing-Shoreham Gap and contributing to the immediate landscape setting of Shoreham.'</p> <p>Taking into account the area's high visual sensitivity, the overall landscape sensitivity of the LCA is assessed as high.</p>

<p>How has the evidence informed the Local Plan allocation?</p>	<p>Shoreham Airport is within an area designated as having high overall landscape sensitivity. The 2012 Landscape and Ecology study was clear that any development at the airport would be likely to have a detrimental impact on the landscape. However, the study noted that there are two locations at the airport where development could be accommodated without detriment to some of the more sensitive views identified in the Local Plan area. These locations are in the north east and south east corners of the airport. While the south east corner is impractical due to aeroplanes accessing the airfield from hangars in this location, the allocation was subsequently located in the north east corner to take account of the recommendations of the study. While this allocation is recognised as being likely to still have some negative impacts on the landscape, given there is a very limited amount of land elsewhere to meet Adur’s employment floorspace needs and taking into consideration the fact that the airport is a successful location for business despite its location within the gap, it is considered that the airport is the most appropriate location for this employment allocation.</p>
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6.5 It is considered that although the gaps would be reduced in size by these allocations, they will still function as gaps and still provide the necessary separation to retain the separate identities of the relevant settlements within the Local Plan area, as verified by the Landscape Study Update 2016.

6.6 The boundary of the newly defined Local Green Gaps generally follows the edge of the strategic allocations other than at the following locations, which will remain part of the Local Green gaps and countryside:

- 1) The country park proposed as part of the New Monks Farm development. (See Policy 5: New Monks Farm).
- 2) an area of public open space on the western side of the West Sompting allocation (See Policy 6: West Sompting).
- 3) the proposed extension to the Cokeham Brooks Site of Nature Conservation Importance (See Policy 6: West Sompting)

(Please note that Appendix 6, section 3.2 of the Adur Local Plan indicates how the Local Green Gap boundaries will differ from the defined strategic gap boundaries in the Adur Local Plan 1996 Proposals Map).

## **7. Conclusion**

- 7.1 The Council proposes designation of Local Green Gaps (through Policy 14 of the Adur Local Plan) in addition to Policy 13: Countryside in order to avoid coalescence of Adur's settlements and maintain their separate identities and a sense of place. Without the additional level of protection offered by the Local Green Gap policy (in addition to the Countryside policy), there is concern that development in the countryside could have an adverse impact on the remaining limited countryside assets between Worthing, Sompting/ Lancing and Shoreham-by-Sea, potentially resulting in continuous development from Brighton to Worthing. This paper has demonstrated that for some time, the principle of planning policy to avoid coalescence has been tested and accepted; yet the principle has been reviewed to take account of current national planning policy as well as local evidence. The gaps, as defined within the Adur Local Plan 1996, have not been treated as sacrosanct and indeed, some land within the former strategic gaps has been allocated for development in the Submission Adur Local Plan 2016.
- 7.2 It is considered that this approach complies with the core principles within the NPPF that account should be taken of the different roles and character of areas, and that the approach taken in the Local Plan is supported by robust evidence. As a result it is considered that Policy 14: Local Green Gaps is justified and appropriate.



## **Appendix 1: Review of the Built-Up Area Boundary and Local Green Gaps as part of the Local Plan**

1. A review of the Built-Up Area Boundary has also been undertaken. Proposed changes were shown on the Policies Map accompanying the Proposed Submission Adur Local Plan 2014; in addition an additional change was proposed at New Monks Farm in the Amendments to the Proposed Submission Adur Local Plan (2016) (See Figure 8 page 208).
2. Applying the criteria used to define the Local Green Gaps and the criteria used to define the Built-Up Area Boundary (see elsewhere in this document for the BUAB review) means that the boundaries of the Local Green Gaps and the Built Up Area Boundary are generally coterminous. Please note that there is one area of countryside in the Local Plan area which is not proposed to be designated as Local Green Gap and this area is just north of the Lancing-Shoreham local green gap, located immediately to the east of Lancing Manor Park. This is because it is not considered that development appropriate to a countryside location in this area would result in coalescence of settlements.

## **Appendix 2: Existing Development in Gaps**

1. Although the aim of the Local Green Gap policy is to avoid coalescence and preserve the separate character and identities of Adur's settlements, it will be noted that the Lancing/Sompting – Shoreham gap already contains some built development. These are 'historic' in the sense of predating the designation of the gaps through planning policy.

### **Ricardos:**

2. Ricardo is an important local employer and has a major role in the local economy. The site lies on the northern edge of the Lancing/Sompting – Shoreham gap, bounded by Old Shoreham Road, the A27 and the River Arun. The company has been located here for many years, and the development predates the designation of strategic gaps in the West Sussex Structure Plan. Its presence within the area designated as countryside and Local Green Gap is therefore 'historic'.
3. Policy 13 of the Submission Adur Local Plan reads:

**Future development at the site currently occupied by Ricardo will be supported subject to there being no adverse impact on the setting and function of the countryside and the Lancing – Shoreham-by-Sea Local Green Gap.**

4. In addition, wording was added to Policy 4: Economic Development policy in 2014 stating:

**Further economic development at the site to the north of the airport, currently occupied by Ricardo, will be supported subject to other policies in this Plan.**

### **Shoreham Airport**

5. Shoreham Airport (formally known as Brighton City Airport) is the oldest licensed airfield in Britain. Some of the built development here (such as the listed terminal building) today is 'historic' in the sense of predating the designation of the gaps through planning policy. Other, more modern development has been permitted due to its association with the activities of the airport, facilitated by policies including those within the adopted Adur Local Plan 1996. (Chapter x of this document explains in more detail why the allocation within the emerging Adur Local Plan has been made on this site, within the Local Green Gap).

### **Appendix 3 - Gap Boundary Changes Proposed in the Proposed Submission Adur Local Plan 2014**

1. This section indicates how the Local Green Gap boundaries will be amended from the Strategic Gap boundaries shown on the Adur Local Plan 1996 Proposals Map.
2. The boundary of the South Downs National Park: The South Downs National Park will be the subject of a separate Local Plan prepared by the South Downs National Park Authority and is not covered in this Local Plan. As such, the boundary of the Gaps within Adur needs to be amended in a limited number of areas to exclude areas designated as National Park.
3. The Lancing – Shoreham-by Sea Gap: The boundary of the Gap is revised to follow the southern edge of the A27. The boundary of the Gap will follow the edge of the newly amended Built- Up Area boundary area, taking account of the strategic allocation at New Monks Farm, with the proposed country park remaining within the Gap. (Please note that the LGG boundary at New Monks Farm was amended in Amendments to the Proposed Submission Adur Local Plan (2016)). The remaining strategic gap area (as identified on the 1996 Local Plan Proposals Map) to the north of the A27 lies within the South Downs National Park and is therefore excluded from the Proposed Submission Adur Local Plan.

4. The Lancing/ Sompting–Worthing Gap: The boundary of the Gap has been amended to follow the southern edge of the A27 up to the administrative boundary with Worthing Borough. The proposed boundary will be drawn around the potential strategic allocation at West Sompting, excluding it from the gap. The remaining strategic gap area (as identified on the 1996 Local Plan Proposals Map) to the north of the A27 lies within the South Downs National Park and is excluded from the Proposed Submission Adur Local Plan.
5. Proposed changes to the BUAB also resulted in amendments to the gap boundaries in four areas as follows: (See maps in Appendix 6 of the Proposed Submission Adur Local Plan 2014 and on the Policies Map).
6. Recreation area south of Hamble Road – Sompting: This play area (which is surrounded on three sides by residential development) will be brought into the built up area, on the basis that it is a use more related to the urban residential area. The review of the gap boundaries proposed that the Local Green Gap boundary also excludes this play area, and the boundary be redrawn to follow the built-up area boundary. (Please note that the play area will still be protected as open space). The Local Green Gap boundary has now been redrawn with regards to the West Sompting allocation (see above) and so this change has been addressed.
7. Street Barn, West Street – Sompting: The built-up area boundary is amended to include the gardens of a new housing development which is now built. As such it is proposed that the Local Green Gap boundary is coterminous with this boundary. The Local Green Gap boundary has now been redrawn with regards to the West Sompting allocation (see above) and so this change has been addressed.
8. Allocation in the 1996 Adur Local Plan for employment development adjacent to proposed East Worthing Access Road: Policy DP AE3 of the Adur Local Plan (1996) for new business development linked to the proposed East Worthing Access Road has not been ‘saved’ as the road is no longer programmed or appropriate. As such, the Gap boundary has been amended to include this area as countryside and Local Green Gap and to follow the administrative boundary of Worthing.
9. Land South of the New Monks Farm site allocation – Lancing: Planning permission was granted in 2013 for a football academy in this location as an exception to the Strategic Gap policy in the Adur Local Plan 1996. This development has now been constructed. Given that the academy includes a number of buildings and comprises formal sports facilities giving it a more urban appearance, it is considered that this area should be included within the Built-Up Area Boundary.