## Day 1 Issue 5

Can the Council review its position on whether all the omission sites should be included in the Green Gaps policy? Provide a detailed note on the justification of this approach.

The Council have taken the view in the emerging Adur Local Plan that the main aim of the Local Green Gaps is to avoid coalescence and maintain separation between settlements in Adur and therefore protect their identity and character, based on locally derived objectives and evidence. This is expressed in Policy 14 as shown 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.

This policy is supported by a significant amount of evidence but most specifically the Adur Landscape Study Update (January 2016). This study, in addition to recognising the importance of the gaps in preventing coalescence, 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.' The study goes on to note that '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.'

The assessment also goes on to state that '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'.

Given that the gap is considered to be critically narrow, it was considered that the local green gap boundary between Shoreham and Lancing should encompass the remaining countryside outside of the New Monks Farm allocation (other than a small parcel of land north of the A27, which is not considered to contribute to coalescence).

During the Adur Local Plan Examination in Public, the Inspector expressed some doubts as to the Council's approach to Local Green Gaps and appeared unconvinced that Old Salts Farm, Shoreham Gateway and Mill Hill should be included within the Local Green Gap as they do not make a significant contribution to preventing coalescence.

While the Council agrees with the Inspector that the development of these three sites would be unlikely to result in the coalescence of the settlements of Lancing and Shoreham, it is considered that all three sites make significant contributions to the landscape setting of their respective settlements and as a result have been included in the Local Green Gap on this basis.

However, should the Inspector not agree with the Council's approach to Local Green Gaps, the Council proposes the following:

- 1) An amendment to Policy 14 (Local Green Gaps) as shown below
- 2) An amendment to Policy 13 (Adur's Countryside and Coast) to include reference to landscape setting and identity as shown below.
- 3) An amended Local Green Gap boundary on the Policies Map so that it only includes land essential to prevent coalescence of settlements. An amended Policies Map is accompanies this note.

Policy 13:	Policy 13: Adur's Countryside and Coast	
Adur's		
Countryside		
and Coast	The landscape character of Adur and other areas of countryside, the coast, river, and settlement pattern will be protected and where possible enhanced. Any development or activities within the countryside must respect and where appropriate reinforce the <b>setting</b> , distinctiveness and sense of place of the above areas, taking into account the various elements which contribute to their distinctiveness such as geology and landform, biodiversity, scenic quality, strategic views, tree cover, settlement patterns, heritage and local vernacular, and land use. The setting of the South Downs National Park must <b>also</b> be respected.	
Policy 14:	Local Green Gaps between the settlements of Lancing/	
Local Green	Sompting-Worthing, and Lancing Shoreham-by-Sea	
Gaps	will be protected in order to retain the separate	
	identities and <del>character</del> <u>avoid coalescence</u> 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.	

- 3) Amendments to the Policies Map to exclude the following from the Local Green Gap:
  - Old Salts Farm This part of the Lancing-Shoreham Gap has fewer landscape and visual constraints to development than other more visible areas. However, the relatively wooded, enclosed character of the Old Salts Farm area, which contrasts with the other more open landscapes within the Lancing-Shoreham Gap, and the pastoral setting of Old Salts Farmhouse (a Grade II Listed Building) are distinctive landscape characteristics that make an important contribution to local sense of place and the setting of Lancing (CD14/10). This area is therefore included within the Countryside and Coast (Policy 13) designation but not within the Local Green Gap as it contributes to the distinctive landscape setting of Lancing but is not essential to prevent coalescence between the settlements of Lancing and Shoreham-by-Sea.
  - Part of New Salts Farm As the landscape character assessment for the Lancing-Shoreham Gap (CD14/10) shows,the New Salts Farm site (as submitted by Hyde Homes) falls into two landscape character areas: the Hasler Fringe (LSG LCA 7) landscape character area to the east and the New Salts Farm (LSG LCA 6) landscape character area to the west. Both LCAs make an important contribution to the distinctive landscape character of the gap and the settings of Lancing and Shoreham-by-Sea. For instance, the natural, irregular patterns of waterways, mature trees, woodland and scrub in the Hasler Fringe LCA and the framed views northwards to the Downs are distinctive landscape characteristics which contribute to the landscape setting of Lancing generally and the Hasler estate in particular. However, the Council acknowledges that the Hasler Fringe LCA does not specifically prevent coalescence of the settlements of Lancing and Shoreham-by-Sea and so can be excluded from the Local Green Gap designation (Policy 14).

By contrast, the open fields on either side of New Salts Farm Road (within the New Salts Farm LCA) provide a strategically important open greenspace which maintains a sense of separation between the buildings of Shoreham Airport and Shoreham Beach and, at a larger scale, between the settlements of Lancing and Shoreham-by-Sea. Views across this area also make a strong contribution to the sense of 'openness' and 'greenness' in the Lancing-Shoreham Gap, particularly in southward views from Lancing Ring, in which the gap appears to extend almost to the sea, and in northward views from the A259, in which the gap is the foreground to views to the Downs. The views across these fields, from the train and from the A259, also form part of the gateway western approach to Shoreham-by-Sea. This is the only part of the Lancing-Shoreham Gap where there are direct views across open green fields from the A259, which runs along the southern fringes of the area. The historic terminal building of Shoreham Airport are local landmarks in these views.

It should be noted that the existing built development along New Salts Farm Road and at Shoreham Airport, which is currently isolated within the open landscape of the gap, ensures that the New Salts Farm LCA is particularly

sensitive to coalescence. This is because there is a risk that development extending across the open fields between Lancing/Shoreham Beach and the New Salts Farm and/or Shoreham Airport buildings will cause these existing groups of buildings to be perceived as the new settlement edge in local views across the gap from the train and from the A259 and in the longer southward views from the Downs. The whole of the New Salts Fam LCA, which includes the open fields on either side of New Salts Farm Road, is therefore included within the Policy areas designated for Policy 13 (Countryside and Coast) and Policy 14 (Local Green Gap) because this area is considered to contribute to the distinctive landscape settings of Lancing and Shoreham-by-Sea and to be essential to prevent coalescence between these two settlements.

• Shoreham Gateway – The Steyning Road site, which lies immediately to the east of the River Adur in the Adur Gateway landscape character area (LSG LCA 4) makes an important contribution to the landscape setting of Shoreham-by-Sea and the South Downs National Park (SNDP) because it provides the foreground to gateway views along the river corridor from the Downs Link path and from the A27 and A27/A283 junction at the point where the River Adur cuts through the southern ridge of the South Downs. It is a significant part of the sequence of views and spaces on the northern edge of Shoreham. At a smaller scale, it also forms part of the landscape setting for the complex of historic riverside buildings within the Old Shoreham Conservation Area, including including the parish church of St Nicolas (Grade 1 listed ) and the Shoreham Tollbridge (Grade II\* listed). Implementation of the new Adur Tidal Walls scheme will change the relationship between the River Adur and the floodplain alongside, but the realignment of the promoted Downs Link along the crest of the new flood embankment will open up views along the wider river corridor.

This site is therefore included within the Countryside and Coast (Policy 13) designation but not within the Local Green Gap (Policy 14) as it contributes to the distinctive landscape setting of Shoreham and the SDNP but is not essential to prevent coalescence between the settlements of Lancing and Shoreham-by-Sea.

• Mill Hill – The whole of the elevated Mill Hill site is classified as a separate landscape character area – Mill Hill Slopes (LSG LCA 9). As the landscape character assessment for the Lancing-Shoreham Gap (CD14/10) explains, this area is classified as high overall landscape sensitivity because of its importance in contributing to the landscape setting of Shoreham and its exceptionally high visibility in local views from the South Downs National Park and the Lancing-Shoreham Local Green Gap. The landscape sensitivity study includes the following section which describes the contribution that the Mill Hill site makes to the landscape settings of Shoreham and the SDNP:

This open grassy slope is perceived as the lower flank of Mill Hill at the only point where an undeveloped part of the Downs extends across the A27 and down into the settlement of Old Shoreham. This field makes a critical contribution to the landscape setting of Shoreham and to the overall sense of undeveloped green space in the Lancing-Shoreham Gap. It makes a valuable visual connection between the Downs and the urban area of Shoreham, 'anchoring' the town within its wider landscape setting. If the urban area were to extend across the Mill Hill Slopes, the A27 would mark the interface between

urban development and countryside in longer views from the Downs. In such circumstances, the A27 would be perceived as a poor quality, abrupt visual boundary to the SDNP (page 34).

This site is therefore included within the Countryside and Coast (Policy 13) designation but not within the Local Green Gap (Policy 14) as it contributes to the distinctive landscape setting of Shoreham and the SDNP but is not essential to prevent coalescence between the settlements of Lancing and Shoreham-by-Sea.

However these sites will remain outside of the Built Up Area Boundary and therefore considered as 'countryside' for planning purposes. **Therefore no amendment to the Built Up Area Boundary is required.** 

In addition no changes are considered necessary to the Worthing-Sompting/Lancing Local Green Gap.