

**WORTHING
BOROUGH
COUNCIL**

**DRAFT
LOCAL PLAN
2016 - 2033**

REGULATION 18

OCTOBER 2018



PART 2 – SPATIAL STRATEGY



**WORTHING BOROUGH
COUNCIL**

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National Policy Context

- 2.1 The purpose of the planning system is to contribute to sustainable development. This is a fundamental principle of the National Planning Policy Framework (NPPF) 2018 which defines ‘sustainable’ as meeting the needs of the present without compromising the ability of future generations to meet their own needs. In this regard, the NPPF sets three overarching objectives to be delivered through the preparation of plans and the policies in the framework:
- social - supporting strong, vibrant and healthy communities;
 - economic - contributing to building a strong, responsive and competitive economy; and
 - environmental - enhancing and contributing to our natural, built and historic environment.
- 2.2 The following policy integrates this ‘presumption’ into the Worthing Local Plan. However, it should be noted that this policy does not affect or remove statutory consultation on planning applications.

SPI	PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT
	<p>a) When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. The Council will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.</p> <p>b) Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in Neighbourhood Plans) will be approved without delay, unless material considerations indicate otherwise.</p> <p>c) Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise - taking into account whether:</p> <ul style="list-style-type: none"> i. the application of policies in the National Planning Policy Framework that protect areas or assets of particular importance provide a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole.

2.3 The presumption in favour of sustainable development established in this Plan means that the Council must plan for and support sustainable growth that seeks to meet identified needs, particularly the needs for housing. However, the NPPF also requires local authorities to take account of the different roles and character of their area. When considering the most appropriate spatial strategy for Worthing, national guidance is clear in that:

- the intrinsic character of the countryside should be recognised;
- heritage assets should be conserved in a manner appropriate to their significance;
- patterns of growth should be managed so that development is focussed in locations which are, or can be made, sustainable;
- previously developed land should be reused effectively;
- full account should be taken of flood risk and coastal change;
- adequate infrastructure is delivered alongside development;
- allocations of land for development should prefer land of lesser environmental value - this will help to conserve and enhance the natural environment.

2.4 Therefore, although national planning guidance places a very strong emphasis on meeting development needs within Local Plans, this must be balanced against other considerations. Ultimately, this informs the level of development that can be delivered in a sustainable manner. In turn, this 'balance' influences the overall spatial strategy.

Sub-Regional Planning Context

2.5 The spatial strategy for Worthing also needs to respond to the sub-regional planning context. In this regard, a key document is the second version of the Local Strategic Statement (LSS2) which has been produced by the Coastal West Sussex authorities together with Brighton & Hove to provide the sub-regional context for delivering sustainable growth for the period 2015-2031. The LSS, which was signed off by the Strategic Planning Board in 2016, sets out the long term strategic objectives and spatial priorities for the coastal authorities to be addressed through a coordinated approach across the area in terms of planning and investment. It sets the following strategic objectives for the area:

- Delivering Sustainable Economic Growth - to promote regeneration in the coastal towns and support the employment needs of the area;
- Meeting Strategic Housing Needs - by the constituent authorities working proactively together and with their partners to meet housing needs;
- Investing in Infrastructure - to address deficits in capacity and to facilitate growth;

- Managing Environmental Assets and Natural Resources - by managing growth, whilst at the same time protecting the designated ecological, and landscape assets.

- 2.6 LSS2 sets out a number of spatial priorities for the different parts of the sub-region. Spatial Priority 4 addresses Worthing and seeks to deliver infrastructure and transport improvements required to help stimulate and maximise investment opportunities in the town centre. Priorities include: regeneration of the seafront; improved levels of accessibility and connectivity; regeneration of key gateway sites; increased vitality of the town centre; and the delivery of new employment floorspace at Decoy Farm.
- 2.7 Since the publication of LLS2 the 'geography' has been extended and the West Sussex and Greater Brighton Strategic Planning Board now represents the local planning authorities of Adur, Arun, Brighton & Hove, Chichester, Crawley, Horsham, Lewes, Mid Sussex, Worthing, together with West Sussex County Council and the South Downs National Park Authority. The Board is currently in the early stages of preparing the third revision to the Local Strategic Statement (LSS3) and there is a clear commitment from all authorities to develop a statement that will develop a long-term and 'deliverable' strategy for the sub-region over the period 2030-2050. The work being undertaken will explore options for meeting the area's unmet needs for housing, employment and infrastructure. Whilst LSS3 will be a non-statutory strategic planning framework, it will influence all of the constituent Local Plans and will help to guide the future location and delivery of development across the sub-region.
- 2.8 The Strategic Planning Board maintains a close working relationship with the Coast to Capital Local Enterprise Partnership (LEP), particularly in relation to the LEP's priorities included in the Strategic Economic Plan. This is not only achieved through cross-representation on both the Board and Partnership but also in the joint working between officers from the local planning authorities and the Partnership's technical support groups. Similarly, there are close links with the Greater Brighton Economic Board, a partnership across the public and private sectors, which grew from the 2014 City Deal. The Greater Brighton City Region is a functional economic area, stretching from Crawley and Gatwick Airport in the north to Lewes in the east and Worthing in the west. The board's ultimate aim is to attract investment to bring jobs and prosperity to the area.

The Local Context

- 2.9 To be effective and respond to local priorities, the spatial strategy must also have regard to a variety of other strategies of the Council and its partners. In particular, this includes Adur and Worthing Councils 'Platforms for our Places' which sets out the Council's ambitions for our places to 2020 and beyond. The document sets out the following five 'platforms' that are deemed to be crucial to developing the long term prosperity of our places, communities' prosperity and well-being:
1. Our Financial Economies
 2. Our Social Economies

3. Stewarding our Natural Resources
4. Services and Solutions for our Places
5. Leadership of our Places

2.10 The spatial strategy has also been shaped by a wide range of local evidence including:

- demographic projections and the need to provide for a variety and mix of homes that are needed to support and maintain sustainable communities;
- the need to deliver sites to meet the needs of new and existing businesses and other essential uses;
- the amount of land available and the level of development that could reasonably be built there;
- infrastructure capacity and constraints;
- environmental constraints – including climate change, flood risk, environmental designations and landscape quality, the historic environment and settlement character;
- representations received during consultation periods; and
- the Sustainability Appraisal of options and policies which also encompasses the Health Impact Assessment and Equalities Impact Assessment.

Strategy for the future of Worthing

- 2.11 As previously highlighted, the most significant constraining factor when considering future development is land availability. Worthing is tightly constrained and there is little scope to grow beyond the current Built Up Area Boundary without merging with the urban areas of Ferring (to the west) and Sompting/Lancing (to the east) and without damaging the borough's character and environment. Furthermore, the town is relatively compact and there are very few vacant sites or opportunity areas within the existing Built Up Area that could deliver significant levels of growth.
- 2.12 Therefore, the reality is, that when compared to many other local authority areas, there are relatively few options for growth. As a result, in many respects, the spatial strategy taken forward in this Plan is similar to that incorporated within the Worthing Core Strategy (2011) which placed a strong emphasis on regeneration and transforming key sites within the urban area. However, in response to changes made to national planning guidance and the need to meet, as much as possible, the housing need for Worthing, one key difference has been the need to now look more positively at potential development options located around the edge of the borough.
- 2.13 The spatial strategy seeks to achieve the right balance between planning positively to meet the town's development needs (particularly for jobs, homes and community facilities) with the continuing need to protect and enhance the borough's high quality environments and

open spaces within and around the town. The overarching objective is therefore to maximise appropriate development on brownfield land and add sustainable urban extensions adjacent to the existing urban area. The core principles, set out in the policy below, take account of the characteristics of the borough and provide a clear direction for development in and around the town. The spatial strategy will help to steer new development to the right locations whilst at the same time helping to protect those areas of greatest value / sensitivity.

SP2	SPATIAL STRATEGY
<p>a) Up to 2033 delivery of new development in Worthing will be managed as follows:</p> <ul style="list-style-type: none"> i. Land within the Built Up Area Boundary - development will be permitted subject to compliance with other policies in the Local Plan. Development should make efficient use of previously developed land but the density of development should be appropriate for its proposed use and also relate well to the surrounding uses and the character of the area. The Local Plan will: <ul style="list-style-type: none"> • seek to provide for the needs of local communities and balance the impact of growth through the protection and enhancement of local services and (where appropriate) the safeguarding of employment sites, leisure uses, community facilities and valued green/open spaces; • help to deliver wider regeneration objectives, particularly in the town centre and seafront, through the allocation of key urban sites and the identification of Areas of Change; • seek to increase the rate of housing delivery from small sites. ii. Edge Of Town Sites - three edge of town sites are allocated for development. iii. Open Spaces / Countryside / Gaps - valued open space and landscapes outside of the Built Up Area Boundary are protected. This includes important gaps between settlements and the undeveloped coastline. 	

2.14 The principles established in the policy above helped to inform the related spatial policies that follow in this section of the Plan. These overarching policies are then supported by more specific policies set out in Part 3 (Development Sites) and Part 4 (Core Policies).

Developing a Target for Housing Delivery

2.15 Historically there has not been a strong relationship between housing targets set for Worthing within Regional Plans / Structure Plans and need and demand for new dwellings in the borough. This is because previous targets took account of the development constraints faced by Worthing and were therefore strongly influenced by the capacity of

the borough to accommodate new dwellings in terms of its physical and environmental characteristics.

- 2.16 However, the NPPF now requires that local planning authorities meet their full need for both market and affordable housing as far as is consistent with other policies in the Framework. The most up-to-date assessment of objectively assessed housing need (based on the standard method as set out in national planning guidance and the 2016 household projections published in September 2018) is 12,801 dwellings over the Plan period (to 2033) which currently equates to 753 dwellings per annum. Further information as to how this figure has been calculated (and capped) is set out in the Housing Implementation Strategy that is published alongside this draft Plan.
- 2.17 Worthing's current level of identified housing need for the plan period (753 dwellings per annum) is a much higher level of housing delivery than the borough has previously planned for or delivered. To put this into context, the Core Strategy set a housing requirement of 200 dwellings per annum and the average annual delivery rate since 2006 has been 285 dwellings (which includes a significant level of housing delivered on a large greenfield site at West Durrington).
- 2.18 In line with the NPPF, the Council has sought to plan positively to establish whether housing delivery could be increased significantly to help close the gap between the level of identified need and recent levels of housing delivery.
- 2.19 The Council's Strategic Housing Land Availability Assessment (SHLAA) has provided the mechanism through which the quantity and suitability of land potentially available for housing development has been determined. In order to maximise the use of previously developed land the Government also requires all local authorities to publish a Brownfield Register annually. Informed by the findings of the SHLAA and a further 'call for sites' the first Brownfield Register for Worthing was published in December 2017.
- 2.20 A number of 'urban' sites that were assessed through the SHLAA and listed on the Brownfield Register are considered to be available, viable and suitable for development and these make up an important part of the Council's housing land supply. Four of the more significant sites that provide the greatest opportunity to deliver residential and wider regeneration objectives are allocated for development in this Plan.
- 2.21 The plan also identifies six Areas of Change (AOCs) which are regeneration sites within the existing Built Up Area Boundary. Although change is expected and encouraged over the Plan period, they are opportunities that, in general, are less advanced than the other urban allocations and, as a consequence, there is less certainty about the likely mix of uses, site capacity and delivery timeframe.
- 2.22 In addition to the more significant urban sites allocated and identified in this Plan it is expected that small sites will play a greater role in housing delivery. As such, the Council supports well-designed new homes on small sites in order to:
- increase the contribution of small sites (under 10 dwellings) to meeting Worthing's housing needs;

- diversify the sources, locations, type and mix of housing supply;
- support small and medium-sized housebuilders; and
- support those wishing to bring forward custom and self-build housing.

2.23 In addition to the opportunities referred to above, other sources of housing land supply such as windfalls, recent completions and extant permissions (summarised below and incorporated within Table 1), will provide the housing that will be delivered within the existing urban area:

- Dwelling completions (net) since 2016 (the base date for this Plan) - **347 dwellings**
- Number of dwellings identified through existing planning permissions (commitments) - these include both large sites which can accommodate six or more dwellings and small sites of 5 dwellings or less and which either have planning permission but on which development has not yet commenced, or are currently under construction but not completed. The total number of additional homes to be provided through existing planning consents - **1,196 dwellings**
- Windfall allowance - a site that has not been specifically identified in the Local Plan process is known as a windfall site. Planning Practice Guidance states that an allowance for windfall sites can be made in the first five years of the housing land supply and also in years 6-15 providing that there is compelling evidence to do so. Allowance to be provided from windfall sites - **949 dwellings**

2.24 Although the Council has been positive in its approach when reviewing options within the town it was very clear at an early stage that there was no prospect of all of Worthing's identified housing needs being met within the existing Built Up Area Boundary. For that reason, the Council has also positively assessed the potential of edge of town sites to help meet development needs.

2.25 The Sustainability Appraisal together with evidence studies that take into account a range of issues and constraints, including biodiversity, flood risk, accessibility, landscape and infrastructure capacity have been used to assess the edge of town sites (most of which are greenfield). The conclusion of the assessment has resulted in the proposed allocation of three sites on the edge of Worthing which will contribute towards meeting some of the borough's development needs. The Built Up Area Boundary will be amended to incorporate these sites when they are allocated.

2.26 A further three edge of town sites have been assessed as being potentially suitable for residential development. However, at this stage in the Local Plan process, sufficient and robust evidence has not been submitted that would provide confidence that the identified constraints could be overcome in order to provide the necessary delivery certainty to justify their allocation. These are referred to as 'Omission' sites.

2.27 The evidence has also demonstrated that three edge of town sites assessed are not suitable for development and this has helped to inform the spatial strategy and Policies SP4, SP5 and SP6 below.

Table I - Housing supply over the Local Plan Period 2016-2033

Sources of Housing Supply	
Dwellings completed (net) 2016-2017	347
Existing commitments (sites where planning permission has been granted)	1,196
Windfall allowance	949
Sites allocated in the draft Worthing Local Plan	853
Sites identified in SHLAA (net) as at 1 April 2017 (other than those allocated above) (495 of these dwellings are incorporated within the Areas of Change)	837
Total Housing Supply (2016- 2033)	4,182
Annual Delivery Target (2016-2033)	246

SP3	DEVELOPMENT SITES	
<p>a) During the period 2016 - 2033 a minimum of 4,182 dwellings (net) will be delivered in Worthing. The following sites are considered to be key to the delivery of future housing in Worthing.</p> <p>b) In the plan period 2016 - 2033, an indicative minimum of 50,000 square metres of employment floorspace (B1, B2 and B8) and 11,957 square metres of commercial (retail and leisure) floorspace will be provided.</p>		
Policy	Allocated Site	Estimated Capacity
A1	Caravan Club, Titnore Way	75 dwellings
A2	Land West of Fulbeck Avenue	50 dwellings
A3	Land at Upper Brighton Road	123 dwellings

A4	Decoy Farm	28,000+ sqm employment uses
A5	Teville Gate	300 dwellings (+ retail / leisure / employment)
A6	Union Place South	128 dwellings (+ leisure / employment)
A7	Grafton Site, Marine Parade	113 dwellings (+ retail / leisure / employment)
A8	Civic Centre Car Park	64 dwellings (+ healthcare facility)
Policy	Area of Change	Estimated Capacity
AOC1	Centenary House	100 dwellings (+ employment)
AOC2	British Gas Site, Lyndhurst Rd	85 dwellings (+ employment)
AOC3	Stagecoach Bus Depot	60 dwellings (+ leisure / employment)
AOC4	Worthing Leisure Centre	New leisure centre - other uses TBC
AOC5	HMRC Offices, Barrington Rd	250 dwellings (+ employment)
AOC6	Martlets Way	Employment uses

2.28 The Council acknowledges that many of the studies used to inform this Plan will require an update to both reflect the new NPPF and to respond to any changes in the local economy and housing market. In addition, further work is ongoing to clarify both the mix of uses and development capacity of the proposed allocated sites and the Areas of Change. The outcomes will be incorporated in the next version of this Local Plan.

Other Development Needs

2.29 Although the delivery of housing provides a key focus of this Plan, it is vital that other uses such as commercial, community and leisure facilities are not overlooked. A number of the development sites listed in the policy above will help to contribute towards meeting some of these needs. Related policies in Part 4 of the Plan will also seek to protect and improve these uses.

2.30 Similarly, the strategy is to plan positively for sustainable economic growth, promoting and enhancing the economic role of the town, and guiding its role within the wider sub-region. The Local Plan will help to deliver sustainable economic development by establishing a clear policy framework that facilitates growth and helps to meet quantitative and qualitative demand for all types of economic activity over the Plan period. The Council's Economic

Research and Employment Land Review (2016), the Retail & Town Centre Uses Study (2017) and other related studies have informed the policy context in this Plan and provide the robust evidence base in regard to sectors or locations when employment uses are to be promoted or protected.

- 2.31 The Worthing Economic Research and Employment Land Review has highlighted the need to retain employment premises and land in the borough. In addition, the study forecasts an employment land requirement of approximately 14,500 sqm of office space (B1a and B1b) and approximately 40,000 sqm of industrial floorspace (B1c, B2 and B8) over the Plan period. The Council's Retail Study 2017 estimates a need to provide 9,200 sqm of comparison floorspace (non-food) and 1,250 sqm of convenience retail (food) (to 2026). As with housing, the lack of suitable development sites around the borough means that the delivery of the employment and commercial needs identified in these studies will be very challenging. However, a number of the development sites outlined above provide an opportunity for mixed use development and one site, Decoy Farm, provides an opportunity to deliver a significant extension to the town's main industrial estate.

Overall Development Capacity

- 2.32 The delivery rates set out above indicate that a realistic housing capacity figure for the borough from 2016 to 2033 is a minimum of 4,182 dwellings. This housing target is a 'capacity-based' figure based on the level of housing that can be delivered within the Plan period, having regard to the identified constraints and potential development capacity.
- 2.33 Taking the above into account, the Plan sets an average minimum housing target of 246 homes per annum to be achieved by 2033. As explained further within the Housing Implementation Strategy, this is a target that is significantly higher (approximately 25%) than the levels of growth planned for within the Worthing Core Strategy. It is a challenging but realistic level of housing development that takes a positive approach to the allocation of sustainable sites whilst also providing the appropriate balance between meeting development needs and protecting the environment and character of the borough.
- 2.34 It is clear however that, despite taking a positive approach to development, the delivery rate for housing will fall significantly below the levels of housing need identified. Approximately 33% of the overall housing need will be met and that this would result in a shortfall in housing delivery over the Plan period of approximately 8,600 dwellings.

Duty To Co-operate

- 2.35 The fact that not all of Worthing's identified development needs will be met within the borough places great importance on Duty to Co-operate considerations. For this reason, the Council has been working with other local authorities across the sub-region to address key strategic matters. Whilst positive progress has been made, it is evident that currently

only a very small proportion of the borough's shortfall might be met elsewhere in the sub-region.

- 2.36 A Memorandum of Understanding (MoU) / Statement of Common Ground (SOCG) has been signed by all the authorities represented within the Sussex Coast Housing Market Area (as well as the West Sussex authorities of Crawley, Horsham and Mid Sussex). This commits the authorities to continue to engage constructively, actively and on an ongoing basis with other local authorities and organisations to address sub-regional issues and to work together to explore longer-term solutions for housing delivery. More information can be found in the Duty to Co-operate Statement which accompanies this Plan.

Land Outside of the Built Up Area Boundary

- 2.37 Although Worthing is primarily an urban area it does contain important open areas including the South Downs to the north, the undeveloped coast to the south, and gaps between settlements to the west and east. As the population density of Worthing increases, the demand for and use of parks and open spaces throughout the borough will increase. The Plan therefore seeks to protect and enhance these assets and seek opportunities to provide new green spaces within development to promote health and well-being in our communities.
- 2.38 The spatial strategy seeks to manage the pattern of development by identifying the Built Up Area Boundary within which development can be sustainably located. To ensure that the most valued and sensitive land/seascapes are protected, and that the existing character of Worthing is maintained, all land outside the Built Up Area Boundary will be designated as countryside and undeveloped coast to protect landscape and coastal character including its environmental and recreational value. In addition some areas outside the Built Up Area Boundary will also be designated as:
- Local Gap - to preserve Worthing's character and identity by preventing settlement coalescence; and/or
 - Local Green Space - to protect green areas of particular importance to the local communities they serve.
- 2.39 The allocation of some edge of town sites will result in the previous Core Strategy Built Up Area Boundary being amended.

The Countryside

- 2.40 A significant amount of land (24.1%) in Worthing borough falls within the South Downs National Park, all of which lies outside the Built Up Area Boundary. It is a nationally important resource because of its distinctive landscape, wildlife, cultural heritage, and opportunities for recreation. Whilst the South Downs National Park Authority took on planning responsibility for the Park in 2011, Worthing Borough Council must still consider whether development within the Worthing Local Plan area could adversely affect the National Park or its setting, including its status as an International Dark Skies Reserve.

- 2.41 The South Downs National Park Authority is a statutory consultee for development which is likely to affect land in the National Park. Its two purposes are to conserve and enhance the special qualities of the South Downs, and to promote opportunities to understand and enjoy them. The Park Authority produces a South Downs Partnership Management Plan (currently 2014-19) and a South Downs Local Plan (submitted for Examination in spring 2018). The Council will continue to work with the Park Authority on issues that affect Worthing, particularly where development may impact on views, the setting of the Park or where opportunities exist to improve access to the South Downs.
- 2.42 Outside of the National Park, there are small pockets of countryside that represent a very small and finite resource that is valued for its open space, respite from intense urban activity, and intrinsic character. Therefore, the countryside should be protected and where possible enhanced, particularly in terms of the additional benefits it can offer through agriculture, green infrastructure (for example to biodiversity and flood management/storage) and informal recreation such as cycling, walking and horse related activity. Given the limited amount of countryside in Worthing, it is important that the few uses that may be allowed in the countryside genuinely require a countryside location; cannot be located within the Built Up Area Boundary and maintain its rural character.

The Undeveloped Coast

- 2.43 Worthing's coastline and beaches are valuable because the shingle beaches are sea defences that are important for shoreline management; the coastal waters and beaches contain important marine habitats including shallow reefs, chalk cliffs and areas of vegetated shingle; and they are used for active pursuits, such as watersports, and for informal recreation.
- 2.44 Any development on Worthing's coastline and beaches is likely to jeopardise their function and value. They will therefore remain outside the built-up area.
- 2.45 The coastal habitats are one of Worthing's key environmental assets and opportunities to protect and enhance the area will be sought as part of any development proposals in the seafront area. Marine planning has important links and interactions with land use planning as the intertidal zone between high water and low water mark is covered by both planning systems. The Marine Management Organisation (MMO) was created in order to achieve clean, healthy, safe, biologically diverse and productive seas. The South Marine Plan (which includes Worthing) was adopted in July 2018. Decisions that might or will affect the marine area will now need to take appropriate consideration of the relevant marine planning documents, including the South Marine Plan under the terms set out in the Marine and Coastal Access Act 2009 (section 58). The MMO also issues marine licences under the Marine and Coastal Access Act 2009 - these may be required for activities involving deposit or removal of a substance or object below the mean high water spring mark or in any tidal river to the extent of the tidal influence. Works may also require consideration under the Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended). Early consultation with the MMO is advised.

- 2.46 The use of the beaches for sport and recreation is generally supported, however permanent built facilities required to support recreational uses should usually be located within the adjacent Built Up Area and be of a design appropriate to the character of the area. In considering any proposal for new recreation or ancillary facilities, flood risk and the need to maintain and improve sea defences will be taken into account.
- 2.47 The coastline south of the Built Up Area Boundary, excluding that defined as countryside, will be defined as undeveloped coast for the purposes of this policy.

SP4	Countryside and Undeveloped Coast
<p>a) Outside of the Built Up Area Boundary land will be defined as ‘countryside and undeveloped coast’.</p> <p>b) Development in the countryside will be permitted, where a countryside location is essential to the proposed use, it cannot be located within the Built Up Area Boundary, and it maintains its character.</p> <p>c) Development to support recreation uses on the coast will normally be permitted subject to:</p> <ul style="list-style-type: none"> i. built facilities being located within the adjacent Built Up Area Boundary; ii. the need to maintain and improve sea defences. <p>d) Any development in the countryside and undeveloped coast should not result in a level of activity that has an adverse impact on the character of the area.</p> <p>e) Improvements to green infrastructure, including enhanced pedestrian, cycle, equestrian access, and better access for those with mobility difficulties will be supported where appropriate.</p> <p>f) The setting of the South Downs National Park and the Designated International Dark Skies Reserve must be respected and opportunities to improve access to the National Park will be sought through joint working with other organisations including the Park Authority, West Sussex County Council, Highways England and landowners.</p>	

Local Green Gaps

- 2.48 The designation and protection of 'Local Green Gaps' helps to avoid coalescence and preserve the separate characters and identities of different settlements by providing physical and visual breaks. This is particularly important given the compact nature of Worthing and how few and fragile the breaks in development are on the coastal strip between Brighton and Chichester.
- 2.49 Four areas are designated as 'Local Green Gaps'- two between Worthing and Ferring to the west:
- Goring-Ferring Gap;
 - Chatsmore Farm;
- and two between Worthing and Lancing/Sompting to the east:
- Brooklands Recreation Area and adjoining allotments;
 - Land east of Upper Brighton Road (see Allocation A3).
- 2.50 These areas are open and either undeveloped or a managed landscape for recreational use. They create a sense of travelling between urban areas and form a critically important component of Worthing's landscape setting.
- 2.51 Looking at the history of the western gaps, historical maps show that in the mid-19th century Goring and the two hamlets of Ferring (West Ferring and East Ferring) were small, nucleated settlements within extensive countryside. The first half of the 20th century saw significant change with housing development and road building expanding both Ferring and Goring. During the 1950s the settlements were linked by a linear strip north of the Goring-Ferring Gap and south of Chatsmore Farm. Increasing urbanisation resulted in the settlement pattern we see today, with the Goring gaps forming the last few fields that stop the settlements coalescing entirely.
- 2.52 Looking at the history of the eastern gap, Worthing has developed eastwards along the coastline over time, with farmland at Little Chesswood Farm to the west of Brooklands replaced by allotments in the 1920s, and the spread of housing within the area from the 1940s. Lancing has spread westwards towards East Worthing more recently, with railway works replaced by housing after the 1960s, and the spread of further housing along the southern edge of the railway to reach the town's current extent. The Brooklands Recreation Area forms part of the remaining gap between East Worthing and Lancing.
- 2.53 The protection of these gaps through planning policy goes back to the 1980s. 'Strategic Gaps' to maintain settlement pattern were a feature of West Sussex County Council Structure Plans from the 1980s right up to the latest Structure Plan of 2001-2016. Significant legislative changes then occurred which removed this layer of planning policy, but the principle of gap protection was carried forward in Local Plans (or their 'saved' policies). It was not until 2011, on adoption of the Core Strategy, that Worthing reframed the protection of these gaps. At that time changes to the planning system called

into question the role of some 'gap' policies. The council therefore placed their protection under the wider and more general remit of protecting the natural environment and landscape character outside of the Built Up Area. Despite this reframing, the intent has always been to protect the gaps between these settlements.

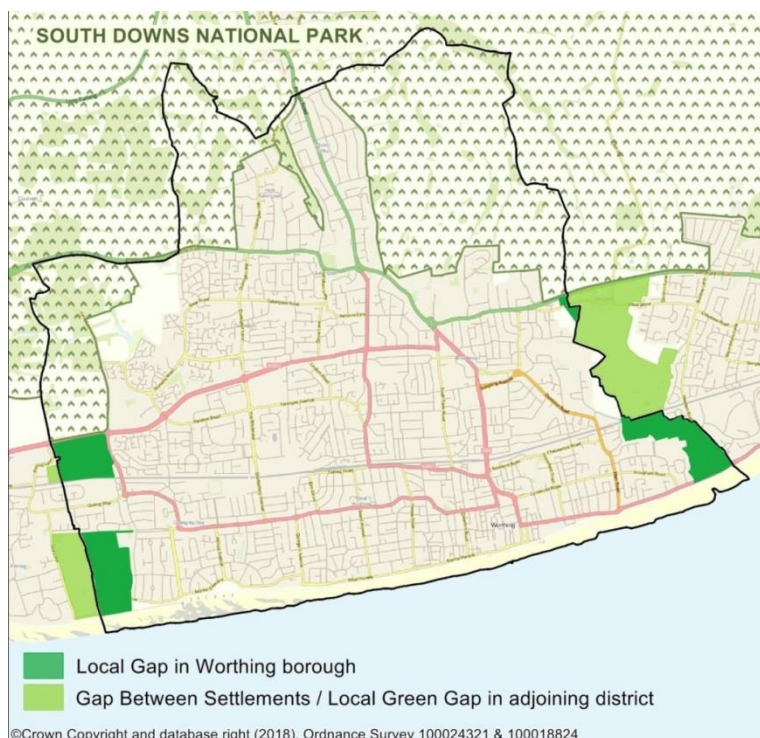
2.54 Neighbouring authorities have similarly sought to protect these gaps. The western gaps are contiguous with gaps in Arun district which will be protected through Policy SD SP3 'Gaps Between Settlements' of the recently adopted Arun Local Plan. The eastern gaps are contiguous with gaps in Adur district which are protected through Policy 14: Local Green Gaps of the Adur Local Plan (adopted Dec 2017). At the sub-regional level the Coastal West Sussex & Greater Brighton LSS2 includes a strategic objective to protect and enhance the character and distinctiveness of individual settlements. Therefore, Worthing's approach to protecting these areas is part of strategic approach shared with adjoining authorities that are concerned to address the same issues of preventing settlement coalescence and protecting settlement identity.

2.55 Additionally, the following documents informing planning policy development in Worthing support the retention of the gaps:

- Issues and Options Consultation - a very high proportion of respondents wanted the Local Plan to protect important gaps / greenfield areas;
- Worthing Gap and Landscape Capacity Study (2007) found that the gap areas should be kept, and in some cases extended into the South Downs National Park;
- Landscape and Ecology Study of Greenfield Sites (2015 & 2017) - found the Goring-Ferring gaps to be the most environmentally sensitive areas of those tested and the least suitable for development. The Brooklands Recreation Area was not assessed as a whole, but the northern portion (Land at Dale Road) was found to have substantial sensitivity.

2.56 The figure below shows the gaps that will be protected in the Worthing Local Plan, and the abutting areas protected by similar gap policies in the Plans of adjoining districts.

Figure 2: Location of Local Green Gaps in Worthing borough, and of gaps in Arun and Adur districts that contribute to the gaps' function of separating settlements to protect identity and character.



SP5	LOCAL GREEN GAPS
<p>a) The four areas listed below are designated as Local Green Gaps between the settlements of Worthing & Ferring and Worthing & Sompting/Lancing, and 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:</p> <ul style="list-style-type: none"> i. Goring-Ferring Gap; ii. Chatsmore Farm; iii. Brooklands Recreation Area and abutting allotments; and iv. Land east of proposed development (site A3) at Upper Brighton Road. 	

Local Green Space

2.57 The NPPF introduced Local Green Space designation as a mechanism for local communities to identify and protect green spaces which are of particular importance to them. It provides special protection equivalent to that afforded by the Green Belt. The designation should only be used where the land is not extensive, is local in character and reasonably

close to the community it serves. It must also be demonstrably special, for example because of its beauty, historic significance, recreational value, tranquillity or wildlife.

- 2.58 There are three areas that the Council intends to designate as Local Green Spaces: Goring-Ferring Gap; Chatsmore Farm; and the Brooklands Recreation Area.
- 2.59 The first two areas have been proposed for designation by the local community. The Council has added Brooklands Recreation Area to the list as the area has recently attracted a growing and active ‘friends of Brooklands’ community group and there is considerable interest in the development of a long-term management plan for the park. All three areas were assessed by a landscape consultant on behalf of Worthing Borough Council to determine their potential for designation as Local Green Space (June 2018) and were found to fully meet the NPPF criteria for designation.

Goring-Ferring Gap

- 2.60 The Goring Residents’ Association and the Ilex Conservation Group (with the support of the Ferring Conservation Group, Ferring Parish Council and Ward Councillors) presented information in support of its request to designate this gap as Local Green Space in 2014. It is valued for its historic associations, views, wildlife, and opportunities to bird-watch, stargaze and enjoy quiet recreation. It is also recognised for the relative tranquillity it affords in an otherwise heavily Built Up Area.
- 2.61 The Goring-Ferring Gap relates strongly to the historic environment having originally fallen within the Goring Hall estate. This estate stretched from what is now Sea Lane, Goring to Sea Lane, Ferring and north to the fields at Northbrook. Goring Hall was built and the Ilex Avenue (best known avenue of Holm Oak trees in Great Britain) planted in about 1840. These elements form part of the Goring Hall Conservation Area. Goring-Ferring Gap skirts around Goring Hall, a Grade II Listed Building now used as a hospital, but includes the Ilex Avenue at its northern edge. It therefore provides the immediate setting to Goring Hall which can be glimpsed from the seafront. The eastern boundary of the gap includes a significant belt of woodland called ‘The Plantation’ which also dates to the 19th century and was laid out to connect Goring Hall to the sea via a wooded walkway. Both the Ilex Avenue on the northern boundary and ‘The Plantation’ on the eastern boundary form a robust edge and are an integral part of the character of the green space.
- 2.62 Settlements have developed over time, and villages that were nestling between the South Downs and the sea have been absorbed by urbanisation. The Goring-Ferring Gap is a valued break in the coastal conurbation. Its flat arable fields are open to the coast road, greensward and sea to the south. This offers an uninterrupted vista across the coastal plain. It is the only part of the undeveloped coastline between Littlehampton and Roedean (apart from Brooklands, which is a far more ‘managed’ open area). The view to the north provides a visual connection between the undeveloped coastline and the South Downs National Park as the substantial oak avenue along Ilex Way obscures the settlement in-between. The Goring-Ferring Gap also provides a view between settlements, marking the transition between Goring and Ferring when travelling along the coast road. These views are important to maintain for their historic contribution to our current sense of place.

- 2.63 The Goring-Ferring Gap is particularly valued for its wildlife, especially its ornithological value. A comprehensive survey in 2014 by the Shoreham and District Ornithological Society recorded a total of 194 bird species. The Society states that this site forms a key site for wintering waders, gulls, Brent Geese and terns and that site is also an important route for migrating birds with trees adjacent to the site including The Plantation being especially significant.
- 2.64 Additionally, data held by the Sussex Biodiversity Record Centre records Biodiversity Action Plan Priority Species, notable birds (that are particularly scarce or vulnerable to development in Sussex), bats, and rare and protected species in the Goring-Ferring Gap and its immediate environs. The Worthing Landscape and Ecology Study (2015 & 2017) found this site to be the most environmentally sensitive area of all sites tested and a high number of respondents to the Issues and Options Consultation raised concerns that any development in this gap would impact negatively on wildlife and biodiversity.
- 2.65 On the matter of landscape sensitivity, in the wider context it should be noted that the Goring Ferring Gap covers 33 ha in Worthing borough, and adjoins 29 ha located in Arun District. Of the sites assessed within Arun District to support the development of their Local Plan this gap was shown as being the most sensitive in nature.
- 2.66 The Goring-Ferring Gap is popular for recreation and is easily accessed. The Ilex Avenue which marks the northern extent of the gap is a bridleway. This is joined by a footpath which runs down Sea Lane on the western edge of the gap to the greensward and a coastal footpath. The gap also contains smaller parcels of land used for formal and informal recreation including Fernhurst recreation ground and Goring Hall recreation ground. The Open Space Study Standards Paper (2014) finds that there is a deficiency of both natural / semi-natural green space and amenity green space in the borough overall, so it is important to retain this resource. This is endorsed by the South Downs National Park Authority's analysis of access to natural green space (July 2014) as it concluded that Worthing was one of the most poorly served areas within the sub-region around the South Downs. In addition, a high proportion of the responses to the Issues and Options Consultation were of the view that all of the gap between Goring and Ferring is valued in its entirety.
- 2.67 The Goring-Ferring Gap also offers the ability to observe the sky at night without light pollution from settlement or street lights. The site is used by several astronomical groups based in the Worthing area for observational sessions, including the Worthing Astronomical Society and the Worthing Astronomers and Skywatchers.
- 2.68 More generally, the area offers an experience of relative tranquility within an otherwise continuous urban area. The National Character Area Profile for the South Coast Plain states that tranquility is a scarce resource within the area, with the main areas of low tranquility being around towns and along road corridors. The perception that this area is tranquil is therefore important and contributes to well-being.

Chatsmore Farm

- 2.69 The Goring Residents' Association's request to designate the green space between Goring and Ferring included Chatsmore Farm. The request highlighted its historic associations,

open view to/from the South Downs National Park, wildlife and recreational value, and its offer as a haven of relative calm within the urban area.

- 2.70 Chatsmore Farm plays its part in the historic landscape. It is in the setting of the South Downs National Park which lies just north of the A259 Littlehampton Road. Within the National Park, directly north of Chatsmore Farm, is the Grade II* Registered Park and Garden 'Highdown Garden' which is also a Conservation Area, and to the northwest of this the Scheduled Ancient Monument 'Highdown Hill Camp'. Chatsmore Farm can be viewed from Highdown Hill and its hill fort. It is important to their setting as it gives a sense of the past relationship between their hill location, the coastal plain surroundings, and ultimately the sea. If Chatsmore Farm were to be developed, it would mask the visual transition between Downs, coastal plain and sea and would harm the setting of historic and landscape assets.
- 2.71 Seen from the hilltop, Chatsmore Farm also forms an effective gap in the view of development along the coastal plain. Chatsmore Farm covers 28ha in Worthing borough (and 2ha in Arun District). It is surrounded by housing on three sides and separates the settlements of Goring and Ferring. The land itself has clear boundaries with a railway line abutting the south side, the A259 forming the north and east boundaries, and housing abutting the west. The transition between settlements is experienced when travelling east/west whether along the A259 or by train. These views are important to maintain for their historic contribution to our sense of place.
- 2.72 Chatsmore Farm itself comprises arable fields with the Ferring Rife flowing east to west crossing the middle of the site, and a line of pylons running just south of the Rife. Despite the presence of the pylons the Landscape and Ecology Study of Greenfield Sites (2015 & 2017) concludes that the majority of this site (excluding the south-west corner) has substantial sensitivity and value. It also found that the Ferring Rife, with its corridor of semi-natural habitats and wider connectivity, contributes to the area having a substantial ecological value. Data held by the Sussex Biodiversity Record Centre adds weight to this view. It records Biodiversity Action Plan Priority Species, notable birds (that are particularly scarce or vulnerable to development in Sussex), bats, rare species and protected species in/around Chatsmore Farm. In addition, their officers have recently surveyed Chatsmore Farm and their initial conclusion is that areas around the Ferring Rife could meet the criteria for designation as a Local Wildlife Site. Further work is to be undertaken which may mean that the existing Ferring Rife and Meadows Local Wildlife Site is expanded to include part of Chatsmore Farm. Local opinion submitted during the Issues and Options consultation is that any development in the gaps between Goring and Ferring would impact negatively on wildlife and biodiversity.
- 2.73 Chatsmore Farm is easily accessed. There is a link from Goring-by-Sea railway, and there are footpaths running along the southern boundary and part of the western boundary. The Goring Residents' Association also note that there are informal footpaths along the Ferring Rife that allow local people to walk and exercise their dogs. It must be remembered that although the South Downs National Park is not far away, it is located on the other side of a busy dual carriageway, which means that Chatsmore Farm is much more accessible to the local community it serves. Furthermore, the National Park Authority has undertaken an

analysis of access to natural green space in the sub-region around the South Downs (July 2014) which concluded that the urban areas of the coastal towns all have low provision of accessible green space, with Worthing cited as one of the most poorly served areas. Chatsmore Farm is therefore an important area of accessible green space notwithstanding its proximity to the South Downs. Comments received during the Issues and Options consultation demonstrated that the gap is valued, in its entirety, for the contribution it provides for health and well-being.

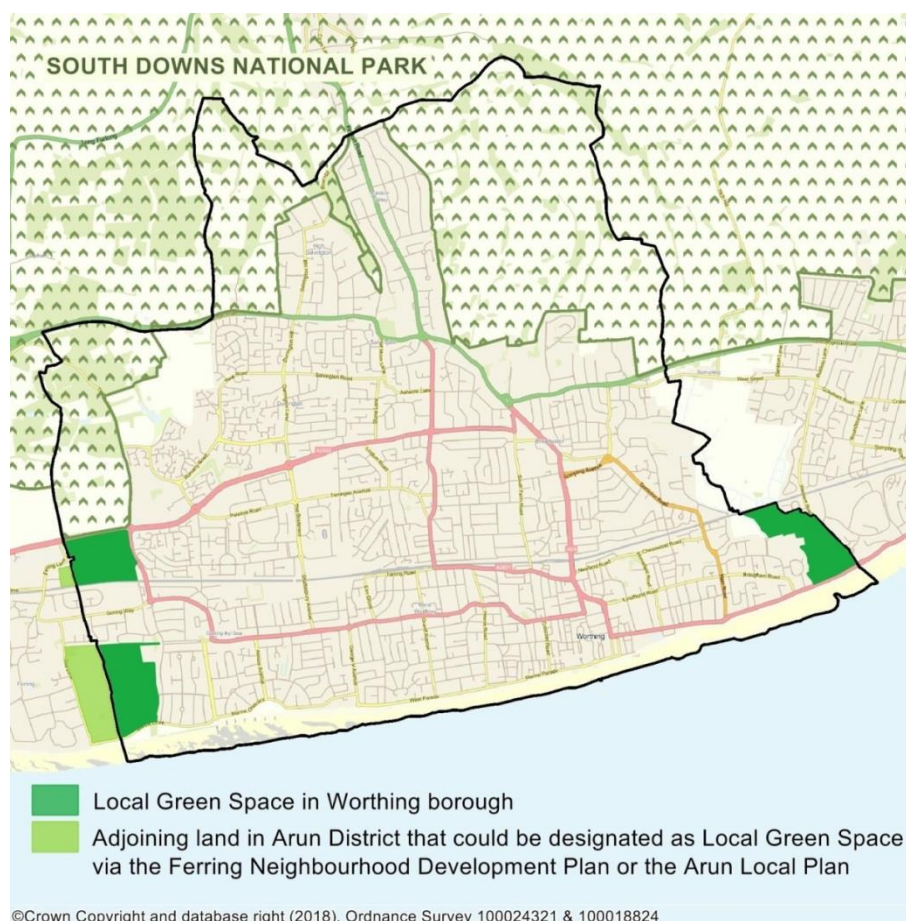
Brooklands Recreation Area

- 2.74 The Council is designating Brooklands Recreation Area as Local Green Space for its local significance to recreation, wildlife and beauty. This 30 ha site also provides the wider ecosystem service benefits of drainage and flood protection relief.
- 2.75 Brooklands Recreation Area was originally used as landfill by the Council until it was reclaimed in the late 1950s when a balancing lake was created to serve East Worthing and parts of Sompting and Lancing. The lake is the focal point of Brooklands Recreation Area which includes a number of leisure and sports facilities along with some parking provision. The Open Space Assessment Report (2014) found that Brooklands lake had one of the highest quality scores for the provision of natural/semi-natural open space in Worthing. It also found that Brooklands' play area (with wheelchair accessibility) had one of the highest quality scores for its provision for children and young people. Brooklands is therefore a very important recreational facility.
- 2.76 The lake has provided a habitat for a wide range of wetland species, and this is set to increase. When the offshore Rampion Wind Farm was built its cables had to come inland and pass under Brooklands. Restoration following these works has created an opportunity to make significant environmental improvements. The lake has been dredged and enhanced with trees planted on the island and a boardwalk created over new reed beds in the margins. A bank to attract Kingfishers and Sand Martins will also be created. A species list of the birds which use Brooklands Park is being compiled by local residents and from the Sussex Ornithological Society's sightings. This could increase the number of species already recorded for the area as recorded in data held by the Sussex Biodiversity Record Centre. That data includes a significant number of bird species, several species of bat, as well as protected species such as adder, common lizard and grass snake.
- 2.77 Outside of the managed park there is an area to the north that has yet to be reclaimed. This also has ecological value. The Landscape and Ecology Study of Greenfield Sites (2017) identified a mosaic of habitats that provide opportunities for a range of species and for the movement of wildlife through the local area. Additionally, the watercourses and their corridors of semi-natural habitats (which run along the northern and western edges) have wildlife value of district significance. As this area has yet to be reclaimed it offers opportunities for improvement, however it would be important to ensure that enhancements benefit both wildlife and recreation. Additionally, the site's contribution to the setting of the surroundings is substantial and should not be compromised. The Landscape and Ecology Study highlights the importance of its treed edge adjacent to settlement and as a backdrop in views from the rural landscape to the north. It indicates

that a formal or informal open space proposal could be appropriate for this area as it may have a more limited effect on views compared to other types of development.

- 2.78 Both the central and northern parts of Brooklands Recreation Area have significant tree cover which buffers the area from surrounding urban influence providing a sense of enclosure and relative tranquility from the built up conurbation. It is important to note that this site is part of the 'gap' between Worthing and Lancing and so also plays a role in providing a sense of place to the local communities it serves.
- 2.79 Brooklands Recreation Area is a well-loved local amenity that is attracting public support for the environmental improvements already made and those that are being planned. In 2017 a 'friends of Brooklands' community group was established, and in early 2018 local residents were consulted about plans to create a management plan for the park. The Brooklands Park Masterplan is being put together by a consultant who has collated feedback from over 800 community responses and is taking into account the results of an ecological study of the park's current wildlife habitats and species present. Forthcoming enhancements and the implementation of a Masterplan will increase Brooklands' recreation and wildlife value and enhance its scenic beauty.

Fig 3: Location of areas designated as Local Green Space in Worthing borough.



Note - this figure also shows adjoining spaces located within Arun District that could only be designated by a development plan relating to the Ferring Neighbourhood Plan area or by the Arun Local Plan.

a) The three areas listed below are designated as Local Green Space:

- i. Goring-Ferring Gap
- ii. Chatsmore Farm
- iii. Brooklands Recreation Area

Goring-Ferring Gap:

b) The Goring Ferring Gap is designated as Local Green Space because the community value: its historic associations including important views that contribute strongly to a sense of place; wildlife; opportunities for bird-watching, stargazing, and quiet recreation; and the provision of relative tranquility in an otherwise unrelieved urban conurbation.

c) Increased quiet and informal recreation would be compatible with this designation. However, additional formal recreation or structures to support informal recreation could damage the qualities for which the Goring-Ferring Gap is valued. Any proposal would have to demonstrate that it does not conflict with those values.

Chatsmore Farm:

d) Chatsmore Farm is designated as Local Green Space because the community value: its setting to the historic environment and the South Downs National Park; important views that contribute strongly to a sense of place; wildlife, especially along the Ferring Rife; and the offer of escape from the urban environment for relaxation and exercise.

e) Increased quiet and informal recreation would be compatible with this designation. Whilst some formal recreation space could be considered it would be important that it did not conflict with the qualities for which Chatsmore Farm is valued.

Brooklands Recreation Area:

f) Brooklands Recreation Area provides a mix of semi-natural open space and recreation/leisure facilities on a scale that is suitable to this area of open and managed landscape. The lake itself has three main functions providing drainage and flood prevention relief; leisure and amenity; and wildlife value.

g) Development in Brooklands will not normally be permitted unless it is for recreation and/or landscape enhancement; does not compromise the functions of the lake or its long term maintenance; is compatible with the park's long-term management plan; uses the existing road access or a new access taken from Western Road; does not adversely impact on nearby residents significantly; and

adequately investigates and takes measures to deal with contaminated land and potential for landfill gas emissions.

- h) Land to the north of the managed park area, which is currently overgrown with scrub and mature trees, could benefit from reclamation. Proposals that may be acceptable, subject to the above points, could include a more managed woodland area with the possibility of open green space and/or an additional recreational facility of suitable scale and materials that sits appropriately screened in the semi-natural environment. Enhancement of boundary and internal tree cover will be required to conserve the separation between East Worthing and Lancing including when viewed from the National Park.**