



**WORTHING LOCAL PLAN 2020- 2036**

# **TOPIC PAPER**

**LAND OUTSIDE THE BUILT UP AREA  
BOUNDARY**

**SUBMISSION**

**May 2021**



**WORTHING BOROUGH  
COUNCIL**

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# Worthing Local Plan

## Topic Paper - Land outside the Built Up Area Boundary

### 1 Introduction

- 1.1 The Worthing 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 Ferring (Arun District) to the west and between Worthing and Sompting / Lancing (Adur District) to the east.
- 1.2 The purpose of this paper is to provide context and rationale of the spatial approach of defining land outside the Built Up Area Boundary as set by Policy SS4: Countryside and undeveloped coast, Policy SS5: Local Green Gaps and Policy SS6: Local Green Spaces. Areas of undeveloped land and coastline protected by the three policy designations provide a valuable source of multi-functional green infrastructure network which offers important recreational and landscape benefits to the local community as well as nature conservation value. The paper sets out the Council's approach and provides the background evidence to support it.
- 1.3 The Worthing Local Plan designates four 'Local Green Gaps' (Policy SS5) - 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 A15).
- 1.4 The Worthing Local Plan also designates three 'Local Green Spaces' (Policy SS6):
- Goring-Ferring Gap;
  - Chatsmore Farm;
  - and the Brooklands Recreation Area.
- 1.5 These designations are in addition to that land defined as the countryside and undeveloped coast - that is, land outside of the Built Up Area Boundary (Policy SS4).
- 1.6 The Council considers that its approach to Local Green Gaps and Local Green Space in the Worthing Local Plan meets the soundness tests set out in the [National Planning Policy Framework](#) (para 35) for Local Plan preparation.
- 1.7 This paper should be read in conjunction with:

- [Landscape and Ecology Study of Greenfield Sites](#) (2015 & 2017)
- [Worthing Gap and Landscape Capacity Study](#) (2007)
- [Local Green Space Assessment](#) (2018)
- [Open Space Study 2019](#) (2019)

## 2 National Planning Policy Context

- 2.1 The National Planning Policy Framework (NPPF), sets out the Government's planning policies and how these are expected to be applied. 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.

### Countryside and undeveloped coast

- 2.2 Paragraph 170 c) of the NPPF states:

"Planning policies and decisions should contribute to and enhance the natural and local environment by: maintaining the character of the undeveloped coast, while improving public access to it where appropriate;"

### Local Green Gaps

- 2.3 The NPPF does not provide any direct basis for Green Gap policies, as it does, for example, for the Green Belt. However, Green Gap policy arguably contributes to the social and environmental dimensions of sustainability. This is because the definition and separation of existing communities and prevention of settlements from merging can contribute to supporting strong, vibrant and healthy communities, and to maintaining a high quality rural environment.
- 2.4 Any Green Gap policy would need to chime with particular paragraphs of the NPPF, showing how it is in conformity with the Framework and gives local expression to its intentions.
- 2.5 Paragraph 97 resists the development of open space (defined as "All open space of public value... which offer important opportunities for sport and recreation and can act as a visual amenity").
- 2.6 Paragraph 118 promotes the effective use of Land. The key principles include the recognition that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk management, cooling/shading, carbon storage or food production.
- 2.7 Paragraph 127 states that planning policies should ensure that developments are visually attractive as a result of good architecture, layout and appropriate and effective landscaping. It continues by stating that policies should ensure that developments are sympathetic to local character and history, including the 12

surrounding built environment and landscape setting and establish or maintain a strong sense of place.

- 2.8 Paragraph 170 explains the importance of conserving and enhancing the natural environment in terms of place making. It states:

*"Planning policies and decisions should contribute to and enhance the natural and local environment by:*

*a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*

*b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*

*c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*

*d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*

*e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*

*f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate."* 2.14 Although a SGG is not in itself a landscape designation, the importance of the gaps and open space in relation to the settlements cannot be separated and is integral to planning and good design.

- 2.9 Although a Local Green Gap is not in itself a landscape designation, the importance of the gaps and open space in relation to the settlements cannot be separated and is integral to planning and good design.

- 2.10 However, it is recognised that care needs to be taken to understand the intended meaning of national guidance as the NPPF does not seek to protect all countryside from development. Instead, focus is given to the protection of "valued" and "distinctive" landscapes. Therefore, it is vital that any planning authority taking this approach has clear and robust evidence to support this form of designation.

### Local Green Space (LGS)

- 2.11 The NPPF introduced LGS designation to protect green areas of particular importance to local communities (paras 99 - 101). It is a way for Local Plans or Neighbourhood Plans to provide special protection equivalent to that afforded by the Green Belt.
- 2.12 LGS can only be designated when a Local Plan (LP) or Neighbourhood Plan (NP) is being prepared or reviewed, and identification of the land must be consistent with positively planned sustainable development. [Planning Practice Guidance](#) (PPG) on LGS makes it clear that blanket designation of open countryside adjacent to settlements is not appropriate. It also gives some examples of green areas that can be designated as Local Green Space: “For example, green areas could include land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis.” (para 13)

## **3 Role and Purpose of Local Green Gaps**

- 3.1 If land lying within the South Downs National Park and the coastline are excluded from development, then there are very few areas within Worthing that lie outside of the built up area.
- 3.2 ‘Local Green Gaps’ are designated to avoid coalescence and preserve the separate character and identity of Worthing as distinct from Adur to the east and Arun to the west by providing physical and visual breaks. This is particularly important given the compact nature of Worthing and its location within the south coast as there are few breaks in development between Brighton-Chichester; those at the edges of Worthing are particularly fragile due to their small size and narrowness.
- 3.3 Although the primary function of the Local Green Gaps is to avoid coalescence (through safeguarding the setting of Worthing), they have ‘secondary’ benefits for biodiversity, green infrastructure, flood mitigation and water storage, include areas of medium or high landscape value, by virtue of their location in the countryside and the Best and Most Versatile Agricultural Land.
- 3.4 Policy SS4: Countryside and Undeveloped 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 development maintains its character and function of the countryside for natural resources.
- 3.5 However, it is considered that a policy designation in addition to Policy SS4 is of value in much of Worthing’s countryside to ensure that development that is otherwise appropriate in the countryside does not contribute to coalescence and therefore the character of Worthing’s settlements is maintained. Development in these areas, even



of uses appropriate to countryside locations could (individually or cumulatively) contribute to the coalescence of Worthing's settlements, leading to loss of character and individual identity, and resulting in uninterrupted development of the coastal strip from Brighton - Chichester.

- 3.6 As a result, designated gaps are safeguarded from inappropriate development through an additional policy test set out within Policy SS5: Local Green Gaps.
- 3.7 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 Worthing's countryside<sup>1</sup>. The undeveloped areas between settlements have been assessed and allocations proposed, despite the limited areas available, in order to work towards meeting Worthing'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. Whilst an option to develop on all of the gaps was the starting point of positive 'testing' the landscape assessment also considered whether partial development of these areas would be acceptable. (For more information see the Landscape & Ecological Assessment and the Housing Implementation Strategy).

## **4 Evolution of Strategic Gap Policy in West Sussex**

- 4.1 The principle of a gap policy is well established and Strategic Gaps have been 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'.
- 4.2 Strategic Gaps were viewed as having strategic importance. The Ferring and Worthing Gap and Worthing and Sompting/Lancing Gaps were both identified as strategic gaps in the West Sussex Structure Plan (Policy CH3). [The Worthing Local Plan \(2003\)](#) which was adopted prior to the adoption of the West Sussex Structure Plan, included Policy C5: Strategic Gaps which designated the precise boundaries of the strategic gaps within Worthing Borough.
- 4.3 The Structure Plan also provided the policy hook for Local Gaps which were listed in Local Plans and addressed areas of open land between smaller settlements. However, a series of significant legislative changes have occurred. Regional Plans were introduced which replaced county Structure Plans, but they did not incorporate

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<sup>1</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.

the policy tools of strategic or local gaps. Regional Plans were then revoked, and this left a policy vacuum while Local Planning Authorities struggled to bridge the gap between local and national policy. This led to local policies being “saved” from older plans until newer ones were made under the evolving system. 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.

- 4.4 However, with increased development pressures against the need to protect valued green spaces within the context of climate emergency and health and well-being of local communities, it has been necessary to reconsider the approach to gaps taken in the Worthing 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 Worthing with neighbouring settlements in Adur District and Arun District. 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.
- 4.5 This historic context indicates that the position of the Submission Worthing Local Plan with regards to Local Green Gaps is not in itself new and the principles have been tested previously within the Worthing Local Plan (2003) 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.

## **5 Description and history of Local Gaps by area**

### *Chatsmore Farm & Goring - Ferring Gap*

- 5.1 Both Goring Gaps have a long history as ‘strategic gaps’ in planning policy dating back to the 1980s, the aim of which was to prevent coalescence and retain the separate identity of settlements.
- 5.2 The northern site, Chatsmore Farm, comprises arable fields with the Ferring Rife crossing the middle of the site flowing east to west, and electricity pylons dissecting the site south of this. It is roughly rectangular with an area of about 28ha, although the southwest corner extends further west into Arun District giving a total area of about 30ha under the same land ownership. It is bounded by the A259 Littlehampton Road to the north (beyond which is the South Downs National Park), the railway line to the south, Goring Street to the east, and is surrounded by development on three sides.
- 5.3 The South Downs National Park (SDNP) is bounded by the A259 opposite to the land at Chatsmore Farm. Significant features in this area are Highdown Gardens and



Bronze Age and Iron Age earthworks on Highdown Hill within the National Park. The land at Chatsmore Farm provides a break in the settlements on the coastal plain and is significant in terms of views from the above mentioned features in the SDNP. The sensitivity of views of the coastal plain is a feature of the landscape in this area of the SDNP. This is evidenced by the [South Downs Landscape Character Assessment \(SDILCA\)](#) Appendix B, Landscape Type B: Wooded Estate Downland and B4: Angmering and Clapham Wooded Estate Down.

- 5.4 The southern site, Goring-Ferring gap, is very open in character comprising flat arable fields and a small amount of grassland including a playing field in the north east portion. The site is about 32ha, although it extends further west into Arun District giving a total area of about 61ha under the same land ownership. On the northern boundary there is an avenue of Oak Trees forming the Ilex Way public footpath. This is part of a Conservation Area that also includes Goring Hall, a Listed Building now used as a hospital, which the northeast corner of the site skirts around. The eastern boundary includes a significant belt of woodland called 'The Plantation'. The site is open to the coast road, greensward and sea to the south, and the southern half of the site is split in the middle by Amberly Drive, a local access road. Residential development lies beyond the northern and eastern boundaries, and to the west of Sea Lane which marks the boundary of the Arun portion of the gap.
- 5.5 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.
- 5.6 At this time, Chatsmore Farm was some distance from the Ferring and Goring settlements. The Arun part of the Goring-Ferring Gap, however, abutted the tiny hamlet of East Ferring at its northwest corner. Goring was a good distance away.
- 5.7 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.
- 5.8 In 1969, an Article 4 Direction was placed on 9ha of the southwest corner of the Goring-Ferring Gap to restrict the scope of permitted development rights. The first application to develop Chatsmore Farm for housing was made in 1969. There followed another application in 1972 for 525 dwellings in the Worthing part of the site, and 55 dwellings on the Arun part of the site. The appeals were dismissed in 1974 on the grounds of loss of agricultural land and the effect of the development on the gap between settlements.

- 5.9 It became clear that some policy protection was needed and the concept of 'strategic gaps' was born, the aim of which was to prevent coalescence and retain the separate identity of settlements. 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.

*Brooklands Recreation Area & Land east of Upper Brighton Road*

- 5.10 This area of open land is bounded to the north by the A27, and links to the sea at its most southern part (within Worthing Borough). The gap is important in terms of maintaining the physical separation and identity of Lancing/ Sompting and Worthing and is quite narrow in parts. It forms a key component of the sense of place and also forms an ecological and landscape corridor linking the South Downs to the sea. The area has remained largely undeveloped, and contains open, relatively level farmland (Urban Fringe Study 2006). It provides long views north-south, and views east-west across the gap. The boundaries of the gap are formed by the developed edge of Lancing/ Sompting, containing suburban housing, Sompting village to the north, and open arable fields and the West Coastway railway line to the south. The area is not generally accessible to the public (West Sussex Landscape Management Guidelines SC11/SC13).
- 5.11 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.

## **6 Evidence**

- 6.1 In addition to landscape analysis a number of criteria have been used to define the gaps in the Worthing Local Plan; these were based on the criteria used by the West Sussex Structure Plan to designate the former 'strategic gaps' in West Sussex. Land identified as Local Green Gaps should:
- Have open and undeveloped character of the land (this does not relate to landscape quality although some areas of gaps may happen to be of good quality);
  - they form a visual break between settlements – actual and perceived (from physical development or level of activity);
  - they create a sense of travelling between settlements;
  - their 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 has been included in these gaps.

- 6.2 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. They contain countryside that is by definition generally free from development and are treated as countryside for the purposes of strategic and local planning. In addition, the criteria for assessment of Local Green Gaps are different from those used to define the Built Up Area Boundary. 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 SDNP Local Plan).
- 6.3 Account was also taken of the [Worthing Gap and Landscape Capacity Study](#) (2007) and the [Landscape and Ecology Study of Greenfield Sites](#) (2015 & 2017). Key findings and recommendations are summarised below.
- Worthing Gap and Landscape Capacity Study (2007)
- 6.4 This study considered the Gap policy areas that fall within the borough. The object has been to test the extent to which every part of the designated gaps fulfil their policy function, that is, prevent coalescence and contribute to the separate identity of settlements and in the case of strategic gaps protect the undeveloped coastline.
- 6.5 Each of the gap policy areas within Worthing borough was assessed on the basis of the structural landscape analysis, landscape characterisation and visual assessment to address the following criteria:
- the potential for coalescence between settlements
  - the potential for the erosion of settings of a settlement and loss of separate identity
  - the potential for impact on Conservation Areas, Listed Buildings and significant views to landmarks
  - intervisibility with adjacent settlements
  - protection of undeveloped coastline.
- 6.6 There are no changes proposed for two of the four gap policy areas. The southern section of the Worthing and Ferring gap and the Worthing and Lancing gap retain their existing policy boundaries which are considered robust given the need to protect the undeveloped coastline, prevent coalescence and maintain visual separation.
- 6.7 An extension to the Worthing and Sompting gap and the northern section of the Worthing and Ferring Gap (extended into the South Downs National Park) was proposed in order to provide a robust edge to the policy areas and reflect the landscape character, topography and visual context of the area.

## Landscape and Ecology Study of Greenfield Sites (2015 & 2017)

- 6.8 Hankinson Duckett Associates (HDA) undertook a Landscape and Ecology Study (Nov 2015) of eight greenfield sites promoted for development within Worthing borough including the Goring Gap sites. They were asked to provide a landscape, visual and ecological assessment of each site to inform a decision on their suitability for development. Their analysis resulted in dividing each site into zones according to the level of its sensitivity and value (see figure 1). The higher the sensitivity/value of the site, the less suitable it would be for development. The possible range included 6 categories, from 'High' (the most suitable for development) to 'Negligible' (the least suitable for development). Of the 8 sites assessed the Goring-Ferring gap was least suitable for development, with Chatsmore Farm a close second, confirming that they are the most sensitive and valued green spaces in the Borough.



### **Chatsmore Farm Suitability for development:**

Zone A: Negligible / Low

Zone B: Low

### **Goring-Ferring Gap Suitability for development:**

Zone A: Negligible

Zone B: Negligible / Low

- 6.9 It can be seen that Zone B in both sites is assessed as slightly less sensitive to development than Zone A.
- 6.10 The Brooklands Recreation Area was not assessed as a whole, but the northern portion (Land at Dale Road) was found to have substantial sensitivity.

- 6.11 The study indicates that, of the areas around Worthing that have been assessed, the Worthing-Ferring gaps are the most environmentally sensitive areas. The study concludes that this site has major / substantial sensitivity. The large proportion of these areas that have negligible or negligible/low suitability for development in terms of landscape, visibility and / or ecology. In the wider context it should also be noted that of all the sites assessed within the Arun Landscape Study (2017) the southern Worthing-Ferring Gap was shown as being the most sensitive in nature.

#### Public Support - Representations

- 6.12 In June 2016, Worthing's [Issues and Options Consultation 'Your Town - Your Future'](#) resulted in a significant number of representations expressing the view that all greenfield sites should be protected from development, or at least protected until such time that all brownfield options had been exhausted. However, two sites in particular attracted the most concern: Site 4: The Goring / Ferring Gap and Site 5: Chatsmore Farm. 70% of respondents, (183 out of a total of 261), raised strong concerns about the potential development of these sites. The vast majority referred to both these sites, with only 4 differentiating between the two sites. This is perhaps unsurprising because both sites perform the function of a gap between the settlements of Goring and Ferring, Site 4 being the southern gap on the coast, and Site 5 the northern gap just northwest of Goring Station. There was overwhelming support for protecting the gaps:
- for their own landscape character and coastal/downland setting with views to and from;
  - to preserve Goring and Ferring's separate identities by avoiding coalescence;
  - to support and enjoy wildlife, particularly roosting and migrating birds;
  - to better manage flood risk from the Rife / coast by keeping natural areas undeveloped; to safeguard grade 1 agricultural land;
  - for their contribution to healthy lives, with their use improving physical/mental well-being; because they are natural areas offering a rural environment close to the urban area.
- 6.13 Furthermore, prior to this consultation, local groups prepared a Local Green Space (LGS) application covering both Gaps which they submitted in Oct 2014. This is a request for the Gaps to be formally designated as LGS to provide special protection against development. This is examined further in section 9 of this paper.
- 6.14 Regulation 18 - Preferred Approach consultation was undertaken in October 2018. [The Summary of Representations Report](#) (March 2019) sets out that there was very strong support for draft Policy SP5: Local Green Gaps with 102 (including 7 organisations) representations being received. Key reasons given in support were that the gaps provide an important break between development. They have multiple functions and have an important role for wildlife, biodiversity, landscape, health & wellbeing, recreation. The vast majority of representations on this policy were also linked to the proposed Local Green Space designation.

## Neighbouring Authorities

- 6.15 Neighbouring authorities have similarly sought to protect these gaps. The western gaps are contiguous with gaps in Arun district which are protected through Policy SD SP3 'Gaps Between Settlements' of the Arun Local Plan (2018). The [Inspector's Report](#) makes the following observations with regards to Policy SD SP3:

*"An additional layer of protection is afforded by the 'Gaps between Settlements' Policy SD SP3. Although much of the coastal plain around Bognor Regis and Littlehampton is built-up there is a need to maintain the character of the remaining undeveloped coast, for example between Littlehampton and Middleton and East Preston and Ferring. The gap between Angmering and Worthing has been compromised to an extent by commercial development around Hangleton. However, the area overall is open in character which distinguishes it from Angmering and West Durrington." (Para 41)*

- 6.16 Subject to a modification to Policy SD SP3, the Inspector considered the policy approach to be sound:

*"MM8 would ensure that the policy allowed for circumstances where relatively modest areas of land could be allocated through NPs and DPDs. With that proviso Policy SD SP3 would be positively prepared and the principle of the policy and the gaps included within the policy are sound." (Para 44)*

- 6.17 The eastern gaps are contiguous with gaps in Adur district which are protected through Policy 14: Local Green Gaps of the Adur Local Plan (2017). The [Inspector's Report](#) makes the following observations with regards to the principle of Local Green Gaps within Adur Local Plan:

*"Great importance should be attached to requirement for good design and the NPPF confirms that a strong sense of place should be established; that the different roles and character of different areas should be taken into account; and that development should respond to local character. Paragraph 61 advises that planning policies should address the connections between people and places and the integration of new development into the natural, built and historic environment. One of the objectives should be the improvement of the character and quality of an area and the way it functions and in broad terms Plans should identify land where development would be inappropriate." (Para 44)*

*"There has been very significant growth along this part of the south coast and in some places there is little to distinguish the start of one settlement with the finish of another. The identity of individual settlements is very much at risk and I saw on my travels that there are few gaps between settlements of much significance. On the basis that it is important for communities to retain their independent character and qualities I agree with the Council that the identification of local green gaps is a justified and necessary approach. Such gaps serve a legitimate planning purpose in preventing settlements merging together." (Para 45)*



6.18 At the sub-regional level the [Coastal West Sussex & Greater Brighton Local Strategic Statement \(LSS2\)](#) is underpinned by a Vision for a sustainable future which states:

- *By 2031 Coastal West Sussex & Greater Brighton will be a place where each town continues to play a different role with its distinctive character, opportunities and 'sense of place'.*

6.19 The Local Strategic Statement is also supported by the following relevant priorities:

Strategic Objective 3 (Investing in Infrastructure) - *Maintain and enhance the provision of Green Infrastructure, particularly where it plays an important 'strategic gap' role and provides a strategic connection across the sub-region and into the South Downs National Park.*

Strategic Objective 4 (Managing Environmental Assets and Natural Resources) - *Protecting and enhancing the character and distinctiveness of individual settlements.*

6.20 Therefore, Worthing's approach to protecting these areas identified as Local Green Gaps is part of a strategic approach shared with adjoining authorities that are concerned to address the same issues of preventing settlement coalescence and protecting settlement identity.

## **7 Defining the Local Green Gaps & Worthing Local Plan Policy SS5: Local Green Gaps**

7.1 Supported by the evidence above, it is concluded that the identified Local Green Gaps defined by Policy SS5 and mapped in the Local Plan form a critically important component of the landscape setting of Worthing, and contributes to its individual character and local identity. It is considered that this approach complies with the NPPF, and that the approach taken in the Local Plan is supported by robust evidence. As a result it is considered that Policy SS5: Local Green Gaps is justified and appropriate. The Local Plan policy, mapping extracts and a summary of the key functions for each area are set out below.

## Goring - Ferring Gap

7.2 The main function of Goring - Ferring Gap is to:

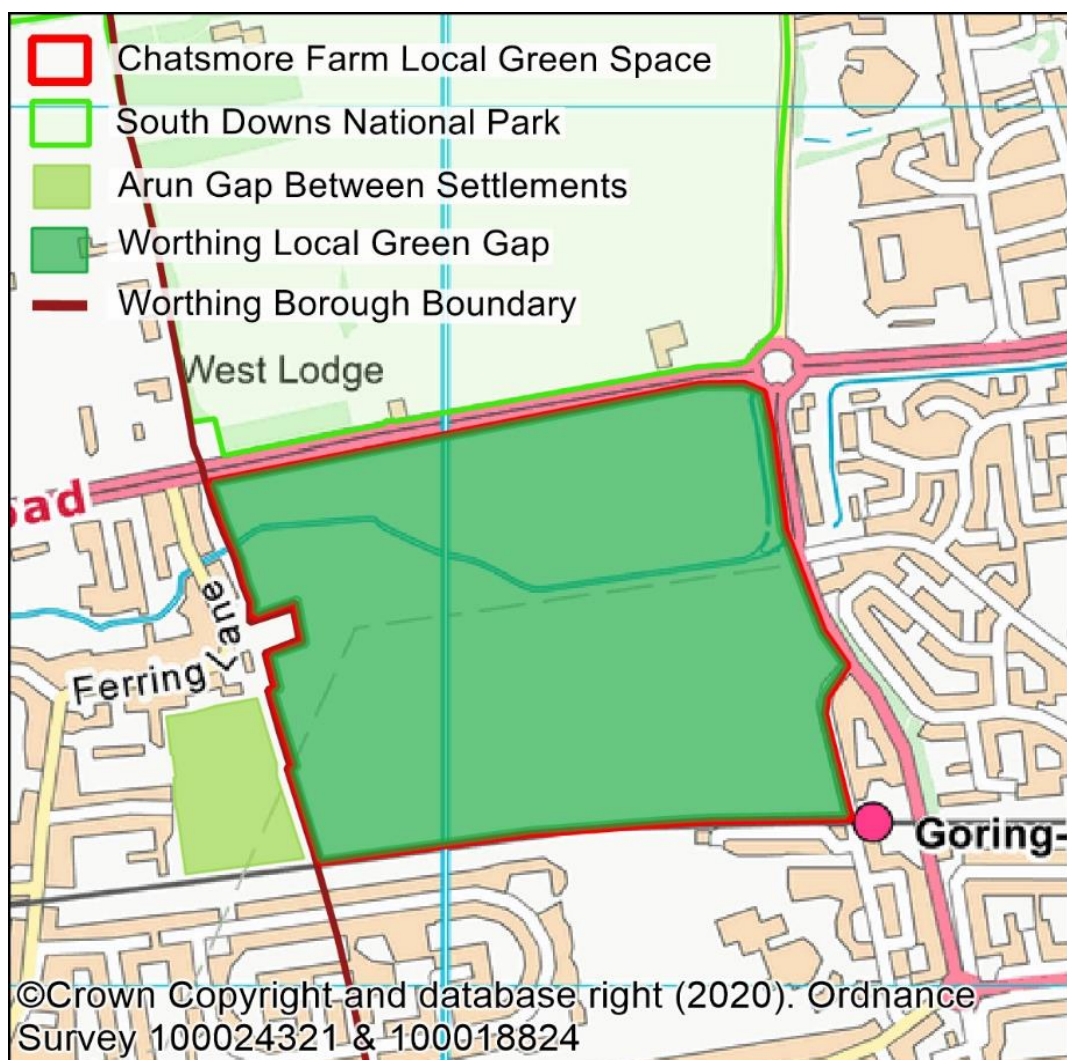
- Form an effective physical and visual separation between Goring & Ferring;
- Contribute to the rurality and undeveloped character of the coastline;
- Provide a visual link between the National Park and undeveloped coastline.
- Protect the provision of accessible open space; and
- Support a variety of habitats and forms an important site for wintering and migrating birds.



## Chatsmore Farm

7.3 The main function of Chatsmore Farm Gap is to:

- Provide a sense of separation between Goring and Ferring;
- Provide an open aspect to surrounding settlements in an otherwise developed coastal plain;
- Form an undeveloped setting to SDNP north and is prominent in views from Highdown Hill within the SDNP;
- Protect the provision of accessible open space; and
- Support a variety of habitats and forms an important site for wintering and migrating birds.

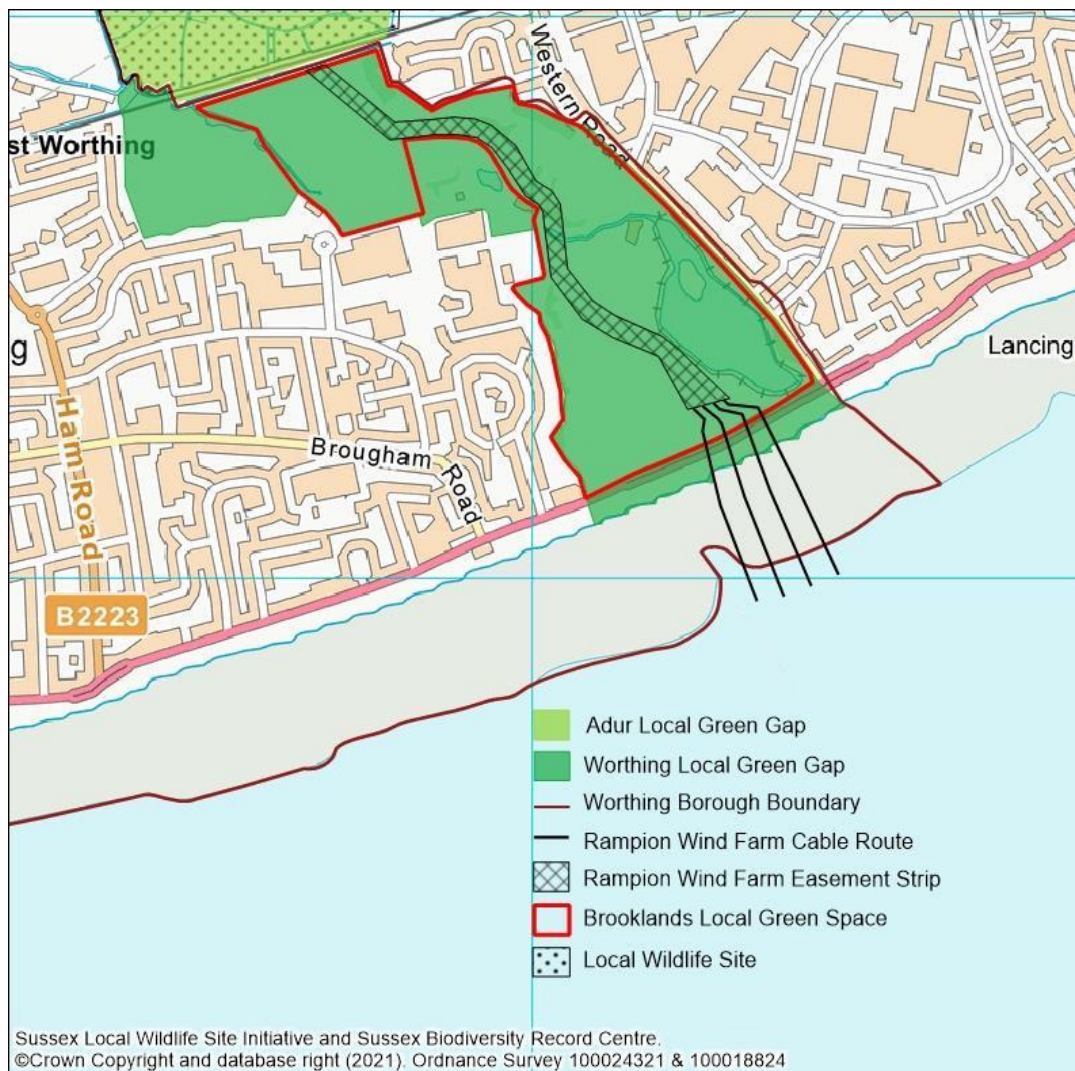




## Brooklands Recreation Area and adjoining allotments

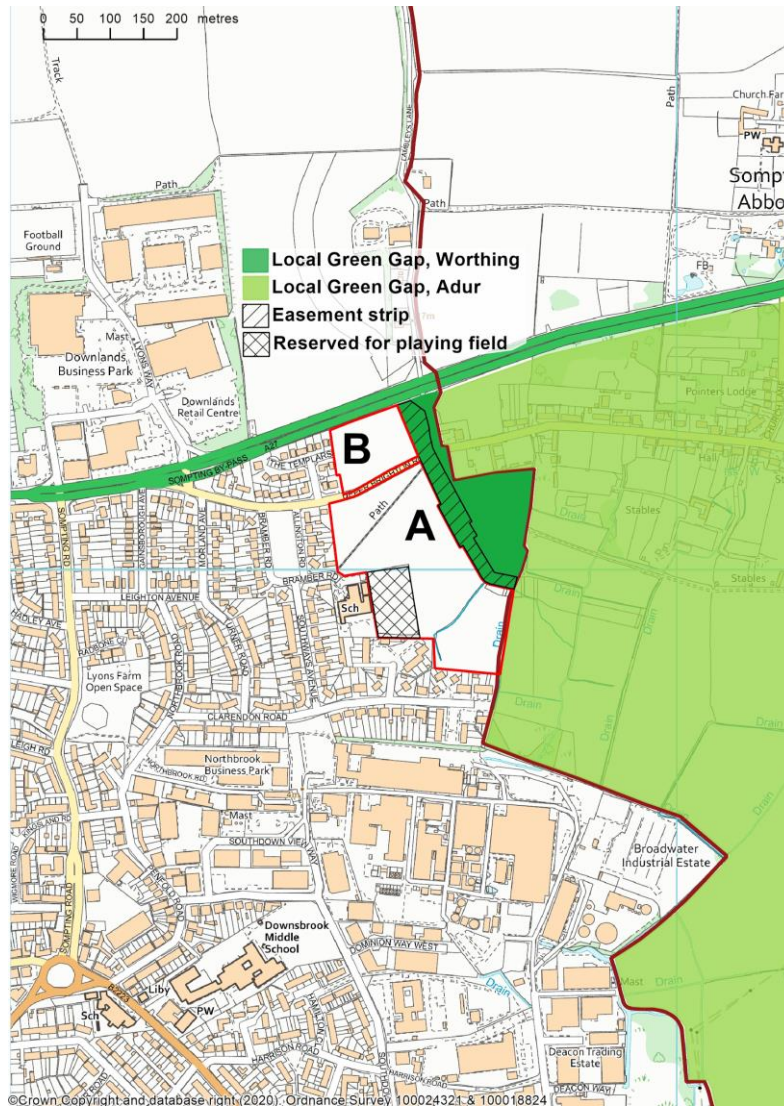
7.4 The main function of Brooklands Recreation Area and adjoining allotments Gap is to:

- Form an effective physical and visual separation Worthing and Lancing;
- Contribute to the rurality and undeveloped character of the coastline;
- Protect the provision of accessible open space; and
- Supports a wide variety of habitats and forms an important site for wintering and migrating birds.



7.5 The main function of Land east of Upper Brighton Road Gap is to:

- Contribute to the landscape and visual setting of the National Park; and
- contributes to the open 'gap' between Sompting and Worthing.



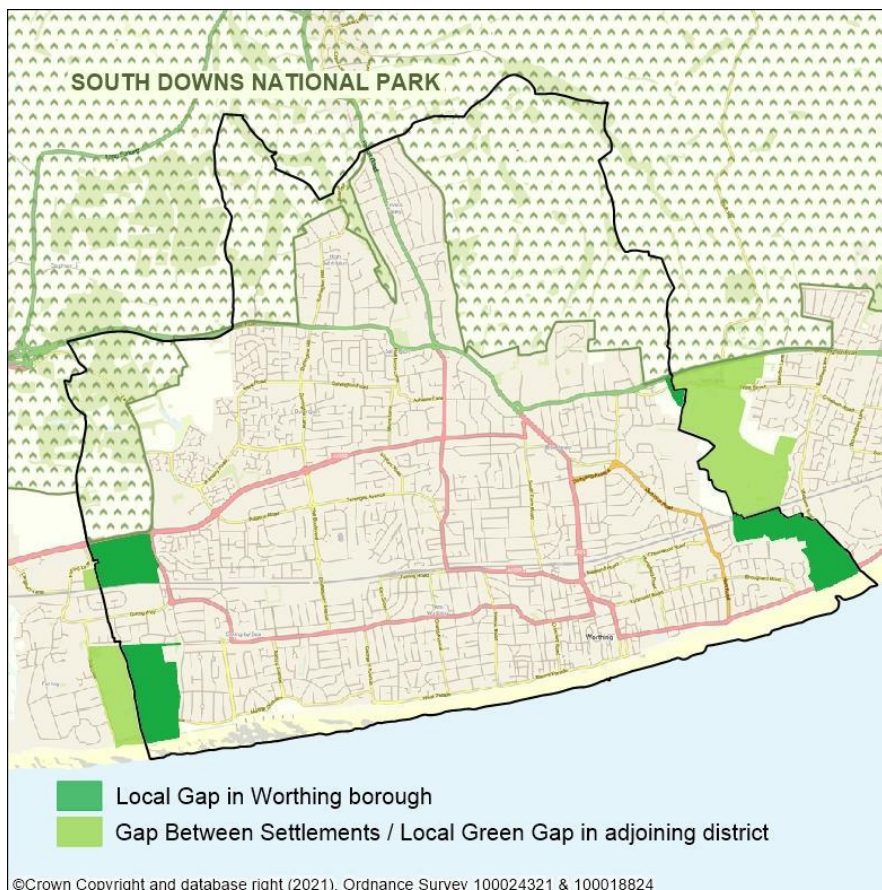
### **Policy SS5: Local Green Gaps**

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.

- a) Goring-Ferring Gap;
- b) Chatsmore Farm;
- c) Brooklands Recreation Area and abutting allotments; and
- d) Land east of development (site A15) at Upper Brighton Road

Development within these Gaps will be carefully controlled and will only be permitted in exceptional circumstances. Any development must be consistent with other policies in this Plan and ensure (individually or cumulatively):

- i) it does not lead to the coalescence of settlements;
- ii) it is unobtrusive and does not detract from the openness of the area;
- iii) it conserves and enhances the benefits and services derived from the area's Natural Capital; and
- iv) it conserves and enhances the area as part of a cohesive green infrastructure network.





## **8 Local Green Space**

- 8.1 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.
- 8.2 Informed by appropriate evidence, which has been reviewed against Government guidance, the Council considers it appropriate to apply a Local Green Space policy mechanism in addition to that of the Local Green Gap designation and land outside of the Built Up Area Boundary. In order to comply with the requirements set out in paragraph 100 of the NPPF, justification and evidence is provided in section 9 to support the Local Green Space designation and policy approach.

## **9 Description of Local Green Space by Area & Evidence**

### Goring - Ferring Gap

- 9.1 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.
- 9.2 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 row of oak trees avenue along Ilex Avenue 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.

- 9.3 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.
- 9.4 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.
- 9.5 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.
- 9.6 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 and provides an important multi-use recreational route. 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.
- 9.7 The Open Space Study 2019 undertook a quantity analysis which (summarised in Table 7.3 ((Section 7.2)) shows that in every Ward, there is a deficiency in at least one typology of open space. The study recognises the importance of rights of way and accessible natural green space within the study area, and the need to maintain and enhance provision for biodiversity. In addition, a high proportion of the responses to both the Issues and Options and Draft Worthing Local Plan consultations were of the view that all of the gap between Goring and Ferring is valued in its entirety.
- 9.8 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.
- 9.9 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

- 9.10 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.
- 9.11 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.
- 9.12 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.
- 9.13 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 both the Issues and Option and Draft Worthing Local Plan consultations demonstrated that the gap is valued, in its entirety, for the contribution it provides for health and well-being.

#### Brooklands Recreation Area

- 9.14 The lake is the focal point of Brooklands Recreation Area which includes a number of leisure and sports facilities along with some parking provision. Planning permission has been granted to transform Brooklands Park with a new visitor hub, adventure play area, outdoor space, sensory garden and fitness trail. Brooklands is therefore a very important recreational facility.
- 9.15 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.
- 9.16 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.
- 9.17 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.

## **10 Worthing Local Plan - Policy SS6: Local Green Space**

- 10.1 Supported by the evidence above, it is concluded that the identified Local Green Spaces defined by Policy SS6 and mapped in the Local Plan (see extracts below) provides a necessary policy tool to safeguard valued green spaces outside the defined built up area from inappropriate development. It is considered that this approach complies with the NPPF, and that the approach taken in the Local Plan is supported by robust evidence. As a result it is considered that Policy SS6: Local Green Spaces is justified and appropriate.

### **Policy SS6: Local Green Space**

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

#### **a) Goring-Ferring Gap:**

**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.**

**i) 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.**

#### **b) Chatsmore Farm:**

**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.**

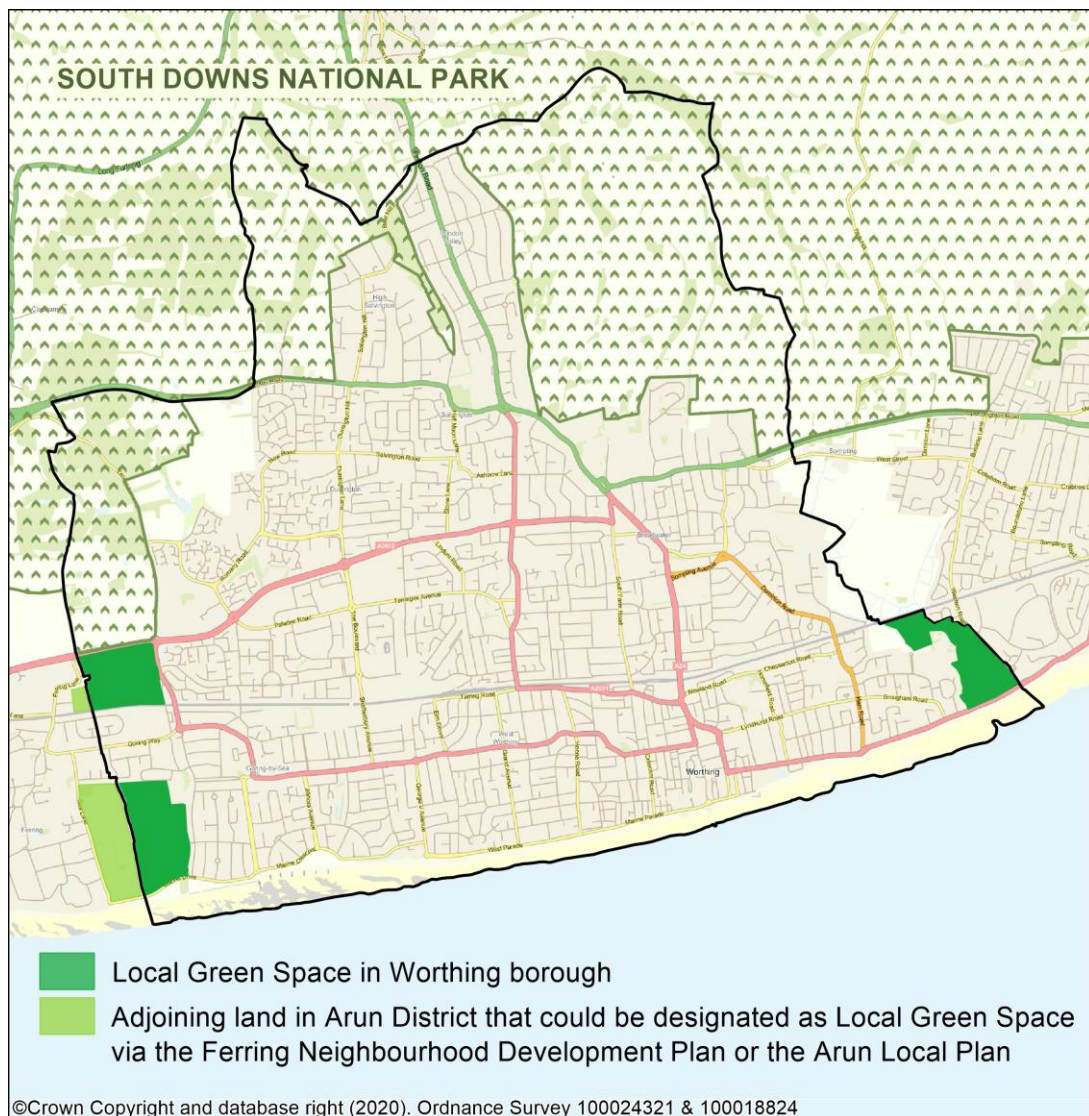
**ii) Increased quiet and informal recreation would be compatible with this designation. Whilst some formal recreation space could be considered it would be important that it did not conflict with the qualities for which Chatsmore Farm is valued.**

**c) Brooklands Recreation Area: 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.**

**iii) 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.**

**iv) Land to the north of the managed park area, which is currently overgrown with scrub and mature trees, could benefit from management. 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.**





## 11 Conclusion

- 11.1 This paper has provided the context and rationale of the spatial approach of defining land outside the Built Up Area Boundary as set by Policy SS4: Countryside and undeveloped coast, Policy SS5: Local Green Gaps and Policy SS6: Local Green Spaces. The paper has explained the Council's approach and provides the background evidence to support it.
- 11.2 In the context of significant development pressure (particularly to meet housing needs) the Council has positively tested the development potential of all edge of town development sites. Six of the nine sites tested in these areas have been allocated for development. Of the remaining sites, strong landscape, biodiversity and ecological evidence demonstrates clearly the need for protection and this position is supported by the vast majority of respondents during Local Plan consultation stages.

- 11.3 These protected open areas create the setting of the settlements (Worthing, Ferring, Lancing) and constitute an integral part of their individual identity and character. Areas of undeveloped land and coastline protected by the three policy designations provide a valuable source of multi-functional green infrastructure network which offers important recreational and landscape benefits to the local community as well as nature conservation value. This in turn provides wider health and well-being benefits to residents and visitors as well playing a key role in adapting and mitigating the effects of climate change.
- 11.4 Supported by robust evidence, the Council considers that its approach to Local Green Gaps and Local Green Space in the Worthing Local Plan meets the soundness tests set out in the National Planning Policy Framework (para 35) for Local Plan preparation in that:
- The Plan has been **positively prepared** and is consistent with achieving sustainable development in Worthing.
  - The approach set out in the Local Plan is the most **appropriate** for Worthing 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 is consistent with national policy and will enable the delivery of sustainable development in accordance with the policies in the NPPF.
- 11.5 Overall, the clear and logical approach being taken in the Local Plan to land outside the built up area is compliant with national policy and informed by robust evidence. The policies for these areas will provide the Council with the necessary tools to safeguard valued green spaces outside from inappropriate development.

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