



WORTHING LOCAL PLAN 2020- 2036

WBC-E-17

Note on overlap and inter-relationship between Policies SS4, SS5 and SS6

November 2021



WORTHING BOROUGH
COUNCIL

Note on overlap and inter-relationship between Policies SS4, SS5 and SS6

The Council acknowledges that during the hearing sessions it became apparent that the application of policies SS4, SS5 and SS6 was overly complex due to an element of 'overlapping' of the designations. To respond to this, the Council considers that the following amendments will help improve the effectiveness of these policies as well as ensuring compliance with the NPPF.

It is important to note that these policy amendments are on the basis that the proposed allocations and designations within the WLP are found to be sound. If some or all of these policies fall away the Council may need to again reconsider the interplay between these policies.

SS4 Countryside and Undeveloped Coast

The Council recognises that with the edge of town sites (e.g. Beeches Avenue / Titnore Lane) allocated for development, there is very little land located outside of the Built Up Area Boundary which is not also designated as Local Green Space under Policy SS6. There is also a need to address entry-level exception sites. Therefore the following modifications are proposed to improve the effectiveness of Policy SS4 and remove overlap and potential conflict with Policy SS6 and ensure consistency with national policy.

SS4 Countryside and Undeveloped Coast

- a) Outside of the Built Up Area Boundary land (**excluding sites designated as Local Green Spaces under SS6**) will be defined as 'countryside and undeveloped coast'
- 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 and function for natural resources.~~ **Applications for the development of entry-level exception sites, suitable for first time buyers will be supported where these:**
 - **comprise of entry-level homes that offer one or more types of affordable housing;**
 - **be adjacent to existing settlements, and proportionate in size to them;**
 - and**
 - **comply with any local design policies and standards.**

SS5 Local Green Gaps

Where sites are also designated as Local Green Space the Council agrees they should not also have to meet criteria in the Local Green Gap policy. The Council also acknowledges that given that the local gaps join with those in adjoining authorities it would be helpful for consistent policy criteria. Therefore the following amendments are proposed to improve effectiveness:

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 proposed development (site A15) at Upper Brighton Road.

Outside of those areas designated as Local Green Space, all applications for development (including entry level exception sites) within Local Green Gaps must demonstrate that individually or cumulatively: ~~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 the Plan and ensure (individually or cumulatively):~~

- i) ~~it does not lead to the coalescence of settlements;~~ **It would not undermine the physical and/or visual separation of settlements;**
- ii) ~~it is unobtrusive and does not detract from the openness of the area;~~ **It would not compromise the integrity of the gap;**
- 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.

SS6 Local Green Space

Following the hearing sessions, the Council recognises that rather than being prescriptive about the types of development that may be acceptable it would instead be more effective for the policy to refer to criteria based on the protection afforded to green belt as set out in the NPPF. Therefore the following modifications are proposed to ensure consistency with national policy:

SS6 Local Green Space

Development will not be permitted within a Local Green Space designated within the Local Plan or an approved Neighbourhood Plan unless there are very special circumstances as set out in the NPPF where the public benefits of the development proposed would outweigh the harm that would be caused by development within the Local Green Space. Enhancements consistent with Local Green Space designation will be supported and will be required where proposed development, judged to meet the very special circumstances test, may impact the 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 of 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 of its 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.~~

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