

Hankinson Duckett Associates

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DRAFT

Comment on Worthing Local Plan Hearing Sessions Inspector's Initial Letter in relation to 'Goring Gap' proposed Local Green Spaces

- 1.1 The Inspector's Initial Letter regarding the Worthing Local Plan Hearing Sessions accepts that proposed Local Green Spaces within the 'Goring Gap' at Chatsmore Farm (to the north), and between Goring and Ferring (to the south), meet criteria a) and b) of the NPPF.
- 1.2 However, the Inspector concludes that both proposed Local Green Spaces do not comply with the requirement that Local Green Spaces should not be "extensive tracts of land".
- 1.3 There is no definition of what constitutes an "extensive tract of land" within the NPPF. The proposed Brooklands Local Green Space is a similar size to the proposed Goring Gap Local Green Spaces. The size of the Brooklands Local Green Space is accepted as appropriate by the Inspector, but in relation to the proposed Goring Gap Local Green Spaces, the Inspector identifies that Planning Practice Guidance sets out that Local Green Spaces should not be "blanket designations of open countryside...".
- 1.4 Both proposed Goring Gap Local Green Spaces are annexed from any wider rural continuum by surrounding built up areas, roads or the sea, and are enclosed on three sides by settlement and the local communities which the two areas serve. However, in their current proposed extent, the Inspector concludes that the proposed Goring Gap Local Green Spaces are unsound, and should be removed from the Plan. The Inspector also questions whether the proposed Local Green Spaces could be sub-divided into smaller or distinct areas. This is considered in brief below.

Chatsmore Farm

- 1.5 The Chatsmore Farm proposed Local Green Space is enclosed by settlement on three sides, including 3 storey buildings to the north-east and multi-storey flats to the south-west, filtered to varying degrees by broken lines of boundary vegetation. The northern edge of the site is more open and farmland continues to the north of the A259.
- 1.6 Ferring Rife and a line of pylons cross through the proposed Local Green Space, but there is limited vegetation internally within the site.

1.7 Given the perimeter containment and limited internal structure, the area constitutes a single visual unit and as such there is no logical or robust reasoning for an alternative boundary to the proposed Local Green Space.

Between Goring and Ferring

1.8 The proposed Local Green Space between Goring and Ferring is also surrounded by settlement on three sides. This area features greater landscape structure than Chatsmore Farm, with a significant belt of woodland plantation to the south-east, a small woodland block and length of hedgerow along the eastern boundary, and a distinctive avenue of evergreen Oak trees along Ilex Way adjacent to the north.

1.9 There is some subtle variation in landscape character within the proposed Local Green Space between Goring and Ferring, due in part to influences of the landscape structure along the external boundaries and the open coastline to the south. However, there is limited tree cover internally, and with the exception of its north-easternmost portion, the area largely functions as a single visual unit.

1.10 The settlement edge and perimeter landscape structure prominently define the area as a whole. Such robust definition could not be recreated by existing internal boundaries if the proposed Local Green Space was subdivided or reduced in size, and therefore it would be preferable for a single appropriate designation to cover the whole area.