

ISSUE 7: COUNTRYSIDE AND COAST, INCLUDING LOCAL GREEN GAPS (POLICIES 13 AND 14)

7.1 Has the Council achieved the correct balance between meeting housing needs and protecting the setting of settlements within the District?

7.1.1 Adur District is located on the coast between Brighton & Hove City to the east and Worthing Borough to the west. The South Downs National Park lies in the northern part of the District (outside of the area covered by the Adur Local Plan) and the English Channel to the south with the low lying land of the Adur Valley separating the settlements of Lancing and Sompting to the west from Shoreham-by-Sea, Southwick and Fishergate to the east. As a result of these landscape constraints, and other factors such as the pattern of existing built development on the predominantly urban coastal plain, the risk of flooding, drainage, and the setting of the South Downs National Park, the Adur Local Plan area is heavily constrained. Policy 13 seeks to deliver Vision V6, V7 and V11; Policy 14 seek to deliver Vision V7 and V11; both will deliver objectives O6 and O7.

7.1.2 Paragraph 151 of the National Planning Policy Framework (NPPF) (CD01/1) states that Local Plans should be prepared with the objective of contributing to the achievement of sustainable development. The NPPF's definition of sustainable development has three dimensions: economic, social and environmental. The Council seeks to achieve a balance between:

- meeting needs for development,
- managing land uses outside the Built Up Area Boundary,
- protecting and enhancing countryside and landscape character, and
- avoiding the coalescence (and therefore loss of individual distinctive character) of settlements within the Adur Local Plan area.

7.1.3 The Council considers that its approach is consistent with the NPPF's definition of sustainable development.

7.1.4 The Council considers that its approach to Local Green Gaps in the Adur Local Plan meets the soundness tests set out in the NPPF (para 182) for Local Plan preparation in that:

- The Plan has been positively prepared and is consistent with achieving sustainable development in Adur.

- The approach set out in the Local Plan is the most appropriate for Adur 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 will enable the delivery of sustainable development in accordance with the policies in the NPPF.

7.1.5 Policy 2 of the Submission Adur Local Plan (SALP) (CD07/1) sets out the overall spatial strategy for the delivery of development in Adur over the Plan period. It guides development within and adjacent to Adur's settlements in order to manage the pattern of development. It describes how new development will be distributed in Adur. Realistic options for locating development are extremely limited due to the compact size of the local plan area and its constrained location between the South Downs National Park and the sea. There are few real choices in terms of different locations or strategies if the Plan is to go as far as it can to balance meeting objectively assessed needs for development whilst seeking to safeguard the countryside and avoid the coalescence of settlements.

7.1.6 The Coastal West Sussex and Greater Brighton Local Strategic Statement 2016 (LSS2) (CD03/1) also recognises the important role of the Local Green Gaps in Adur. With regards to development at the Airport, it states:

“Priorities for securing new employment floorspace and job opportunities will include improved road access from the A27, which will also facilitate access to a new strategic mixed use site. Development potential should take into account the landscape setting and views of the Airport from the River Adur and the South Downs National Park, biodiversity and heritage assets of the area and the need to protect and preserve the green gap between Lancing and Shoreham.”

More generally, it states:

“Taking account of the opportunities on the fringe of the urban areas to meet future housing needs, the Green Gap between Lancing and Shoreham will be protected to preserve the character of Lancing and Shoreham and its role promoted as Strategic Green Infrastructure.”

7.1.7 Due to the need to meet objectively assessed needs for development in the Adur Local Plan area, it has been necessary to allocate greenfield land for development on sites formerly within Adur's countryside and Strategic Gap as designated in the adopted Adur Local Plan 1996. These undeveloped areas between settlements have been assessed and allocations proposed,

demonstrating that these Gaps have not been used as an absolute constraint to development but that the Local Plan aims to strike the best possible balance between providing new development to meet the needs of Adur, while at the same time avoiding coalescence in order to maintain and enhance the local character and individual identity of settlements. (Section 6 of the Local Green Gaps Topic Paper (CD07/14) discusses how landscape issues have been taken into account in allocating strategic sites).

- 7.1.8 It is recognised that the proposed allocations will lead to a reduction in the size of these undeveloped areas, but the analysis set out in the Landscape Study Update 2016 (CD14/9) demonstrates that they will continue to function as gaps and provide the necessary separation to retain the separate identities of the settlements within the Local Plan area.
- 7.1.9 Other sites have been assessed for their potential to be allocated, and considered inappropriate due to, among other things, their adverse impact on the setting of settlements within Adur. It is appreciated that these sites could, if allocated, contribute to meeting Adur's housing needs. However this would conflict with the NPPF:
- The Core Planning Principles set out in paragraph 17 of the NPPF include the need to: "take account of the different roles and character of different areas." It is considered that the development of these sites, and their subsequent impact on the countryside and local green gaps, would have an irreversible adverse impact on the character of the Local Plan area.
 - Paragraph 14 of the NPPF states that Local Plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole. This paragraph makes it clear that local planning authorities should plan positively to meet the development needs of their area and should meet objectively assessed needs unless there are significant adverse impacts of doing so.
- 7.1.10 It is also noted that some of the promoters of these sites have indicated that the impact of development on these sites can be mitigated. Although it may be possible to mitigate the *landscape and visual impacts* of built development, it is not considered possible to mitigate *coalescence*, as such development would extend the built form into the open gap areas.

7.1.11 The boundaries of the Local Green Gaps in the Submission Adur Local Plan 2016 (CD07/1) are informed by Figures 8 and 13 in the 2016 Adur Landscape Study Update (CD 14/9), which describe the distinctive landscape settings of the towns of Worthing, Lancing and Shoreham within the Adur Local Plan area. The Assessment of Landscape Sensitivity 2016 (CD14/10) was commissioned in order to understand the landscape sensitivity of the areas of countryside within the Adur Local Plan area. It was then used to help inform decisions as to the acceptability of development in a number of greenfield locations within the district as well as test the validity of draft policies in the emerging Local Plan. The landscape of the district forms a key part of its character and it is essential that areas that make a strong landscape contribution to the district are not developed.

7.1.12 This analysis describes the way these landscapes are perceived from the perspectives of local recreational routes, viewpoints and roads. It demonstrates that the entire area within the two Adur Local Green Gaps contributes to the distinctive landscape settings of the adjacent towns and therefore merits protection.

7.1.13 This 2016 Study updates the 2012 landscape work (excluding the ecology elements). It 'tests' Policies 13 and 14 of the Proposed Submission Adur Local Plan 2014 (CD04/1). It also updates the 2012 study with reference to the development of the (at that time) recently completed Brighton and Hove Albion Football Academy, and the (then) proposed Shoreham Adur Tidal Walls scheme. The study analyses and 'tests' the extent of the area of undeveloped landscape between settlements that is required to retain their separate identity and character. Specifically it:

- Checks the boundaries of the BUAB and LGGs shown on the Policies Map are consistent with the objectives of Policies 13 and 14;
- Considers the findings of the overall landscape sensitivity study in relation to the specific criteria and objectives of policies 13 and 14.

7.1.14 The study takes careful account of landscape setting and its relationship to sense of place. It states:

"It is this vital sense of space around a settlement that enables us to take stock, assess and understand its relationship to its surroundings. The scale and extent of the space required for an effective landscape setting involves subjective judgement, but it is a judgement that can be informed by objective analysis and evidence from studies of landscape character and sensitivity." (Page 5 Adur Landscape Study Update 2016 (CD 14/9)).

“This study analyses what this means spatially and considers that the landscape setting of a settlement is an integral component of its individual character and identity. It follows that the Local Green Gap is the area required to provide an effective landscape setting for the settlements on either side of the gap.” (Page 6 Adur Landscape Study Update 2016 (CD 14/9)).

- 7.1.15 Part 5 of the Local Green Gaps Topic Paper (CD07/1) explains that the Local Green Gaps have been defined to ensure:

“development that is otherwise appropriate in the countryside does not contribute to coalescence and therefore the character of Adur’s settlements is maintained. Development in these areas, even of uses appropriate to countryside locations could (individually or cumulatively) contribute to the coalescence of Adur’s settlements, leading to loss of character and individual identity, and resulting in uninterrupted development of the coastal strip from Brighton to Worthing”

- 7.1.16 Representations have been submitted which indicate that sites within these gap and countryside areas are of low landscape value and therefore appropriate for development. However, it should be stressed that areas defined as Local Green Gaps are protected on the basis of their geographic location, rather than on the basis of landscape *quality* (although gap areas may happen to contain areas of good quality), or their value in terms of scenic, biodiversity, heritage or other green infrastructure assets (although gap areas may be valued for these reasons).

- 7.1.17 Boyer’s representation states (para 2.49) that *neither of the landscape studies nor the Topic Paper itself describe, identify or quantify what the necessary separation required is in real or physical terms.*

- 7.1.18 This statement is misleading because the Adur Landscape Study Update 2016 (CD14/9) specifically addresses this issue. It analyses and defines the broad landscape settings of the settlements which border the gaps based on the zones of visual influence of accessible local views and the character of the ‘landscape edges’ which structure the way we perceive the landscape in views from the principal gateway approaches via roads and the railway and from publicly accessible footpaths and viewpoints. The report acknowledges that the landscape setting of a settlement cannot easily be measured but, taking the analysis of the Lancing-Shoreham Gap as an example, Section 2 describes how the ‘landscape edges’ can be shown to define the broad landscape settings for Lancing and Shoreham-by-Sea (illustrated on Figure 8) and thus the minimum land-take that is required to retain their separate identities. As Figure 8 demonstrates, there

is an extensive overlap between the landscape settings of Lancing and Shoreham in the centre of the Lancing-Shoreham Gap; it is this central area, where the landscape settings overlap, that is considered critically important to provide the 'necessary separation' required to retain and protect the separate identities of these two settlements. Section 2.2 states:

“While the Lancing-Shoreham Gap clearly does provide a critically important visual break between these settlements, these views, and the continuous urban edge along the coast, suggest that the gap is already critically narrow. There is a risk that further development within the gap, in addition to that allocated in the Proposed Submission Adur Local Plan, would contribute to the coalescence of Lancing and Shoreham-by-Sea.”

7.1.19 In conclusion, the Council considers that it has struck an appropriate balance between seeking to meet objectively assessed housing needs, and protecting the setting of settlements within the Local Plan area.

7.2 Is the identification of the ‘countryside and coast’ and ‘local green gaps’ (policy 14) justified?

7.2.1 The Core Planning Principles set out in paragraph 17 of the NPPF include the need to: *“Take account of the different roles and character of different areas.”*

7.2.2 The combined effect of Policies 2, 13 and 14 of the Submission Adur Local Plan (SALP) (CD07/1) is to guide development to most the sustainable locations and maximise development on brownfield sites. The existing settlements of Lancing, Sompting, Shoreham-by-Sea, Southwick and Fishersgate will continue to be the focus of growth for the plan period, together with the regeneration area at Shoreham Harbour. The Built Up Area Boundary (BUAB) will guide most forms of development to within these areas, in order to manage the pattern of development. (The BUAB has itself been reviewed; see the Local Green Gap Topic Paper CD07/1) for more details).

7.2.3 Policy 13 relates to Adur’s Countryside and Coast. It sets out those forms of development which will be acceptable within the countryside. It addresses the management of land uses outside the BUAB, as well as the protection and enhancement of landscape character. Given the limited amount of countryside in Adur, it is important that those uses allowed in such areas genuinely require a countryside location and cannot be located elsewhere. Defining the countryside (and coast lying outside of the BUAB) is considered to be consistent with the reference in paragraph 17 of the

NPPF to *“Take account of the different roles and character of different areas.”*

- 7.2.4 The majority of Adur’s countryside lies within the open areas between Worthing-Lancing/Sompting and Lancing-Shoreham-by-Sea which have also been designated as ‘Local Green Gaps’ (Policy 14) to avoid coalescence and preserve the separate characters and identities of Adur’s settlements by providing physical and visual breaks. This is particularly important given the compact nature of Adur and its location within the wider Brighton conurbation. Travelling along the south coast via the A27, A259 or the Sussex Coast railway, there are few breaks in development between Brighton and Chichester; those in Adur are particularly fragile due to their small size and narrowness. These open areas create the setting of settlements and constitute an integral part of their individual identity and character.
- 7.2.5 The aim of policy 14 is to ensure that, where uses are permitted within the countryside, (consistent with policy 13) they do not, individually or cumulatively, lead to the coalescence of settlements which would lead to a loss of character and individual identity, and ultimately result in uninterrupted development of the coastal strip from Brighton to Worthing. The aims of policy 14 therefore differ from those of Policy 13, hence the different policies and designations on the Policies Map (CD06/2) which clearly set out the relevant designated areas. (It should be noted that within a previous iteration of the Local Plan, these were addressed within one single policy. However a representation pointed out that the policy was seeking to address landscape character and coalescence – two different issues - in a single policy, and so further iterations of the plan addressed these matters through separate policies).
- 7.2.6 It should also be noted that the countryside area and Local Green Gaps designation are not identical in terms of the geographical area covered. There is a small area of land north of the A27 on the eastern boundary of Adur, which has been excluded for the Local Green Gap designation because it is not considered that development in this area would contribute to coalescence of settlements.
- 7.2.7 It should also be noted that gaps have been designated in Adur’s countryside (and elsewhere in West Sussex) prior to this Local Plan – the historic context is set out in section 3 of the Local Green Gaps Topic Paper (CD07/1). This indicates that the position of the SALP with regards to Local Green Gaps is not in itself new and the principles have been tested previously 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.

- 7.2.8 In conclusion, it is considered that the identification of countryside and coast, and local green gaps is justified due to the differing aims of these two policies and their evidence base. An alternative approach (not to designate local green gaps as well as countryside) could result in coalescence resulting from a concentration of development within the countryside. As a result it is considered that both Policy 13: Countryside and Coast and Policy 14: Local Green Gaps are justified.
- 7.2.9 Further discussion of local green gap and countryside issues, in relation to sites not included within the Submission Adur Local Plan, may be found in the Council's response to Issue 3.2.
- 7.2.10 The representation from ECE Planning (ref), which promotes the inclusion of a residential development on an omission site, Land at Steyning Road, Shoreham, does not agree with the Council's assessment of the landscape value of the site and considers that its development would avoid the coalescence of settlements.
- 7.2.11 Further discussion of local green gap matters in relation to sites not included within the Submission Adur Local Plan, may be found in the Council's response to Issue 18.

7.3 Is the prevention of the coalescence of settlements a reasonable and justified objective?

- 7.3.1 Yes. Paragraph 14 of the NPPF states that Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole. This paragraph makes it clear that local planning authorities should plan positively to meet the development needs of their area and should meet objectively assessed needs unless there are significant adverse impacts of doing so.
- 7.3.2 The Core Planning Principles set out in paragraph 17 of the NPPF include the need to: *"take account of the different roles and character of different areas."*
- 7.3.3 The response above sets out the Council's view that the Local Green Gaps are intended to avoid coalescence and maintain separation between

settlements in Adur and hence to protect their identity and character, based on locally derived objectives and evidence.

7.3.4 The evidence base for the Adur Local Plan includes the Landscape and Ecological Survey of Key Sites within the Adur District 2012 (CD14/2), the Assessment of Landscape Sensitivity, 2016 (CD14/10) and the Landscape Study Update 2016 (CD14/9). The latter described the gaps as being a ‘critically important component of the landscape setting (of Worthing, Lancing and Shoreham-by-Sea), contributing to their individual, distinctive character and local identity’ (p5). The study goes on to note:

“For a landscape to provide an effective landscape setting for a settlement, it must:

- *“Have distinctive landscape characteristics, which have sufficient depth and interest to provide unique views to and from the fringes of settlements; and*
- *Enable an experience of travelling through open undeveloped countryside or ‘green’ open space, as part of the gateway sequence of approach and arrival at a settlement.”*

(For further information please see: Adur Landscape Study Update 2016 (CD14/9) Section One, Scope and Purpose.

7.3.5 A policy which seeks to prevent the coalescence of settlements is considered essential in Adur, where there are only two remaining gaps within the belt of urban development that stretches along the coastal plain. These undeveloped gaps are a critically important component of the landscape setting of Adur’s principal settlements, Shoreham-by-Sea, Lancing/Sompting and Sompting Village and also of Worthing to the west, because they provide the vital space that is necessary to allow distinctive views, a sense of arrival and an identifiable, individual sense of place. Without these gaps, there would be a continuous strip of development between Worthing in the west and Brighton in the east - and an associated massive loss of local character and identity. It is considered that this approach complies with the core principles within the NPPF that account should be taken of the different roles and character of areas, and that the approach taken in the Local Plan is justified and supported by robust evidence.

7.3.6 The representation from ECE Planning, which promotes the inclusion of a residential development on an omission site, Land at Steyning Road, Shoreham, contends that the Council has not properly considered the

impacts that the forthcoming Adur Tidal Walls Scheme will have on this site and views across it, which the developer considers will be severely limited.

7.3.7 The analysis of landscape sensitivity in The Assessment of Landscape Sensitivity for the Adur Local Plan Area (Sheils Flynn 2016) (CD14/10) and the analysis of the landscapes with Adur's two Local Green Gaps in the Landscape Study Update 2016 (CD14/9) have been updated to take account of the impacts of the Adur Tidal Walls Scheme. This project is particularly relevant in the context of the Steyning Road site because the new flood defence embankment will form the riverside boundary to the site and the existing Downs Link path, which connects the urban areas of Shoreham with the South Downs National Park, will be diverted to run along the crest of the new embankment at a height of 1-1.5m above its current elevation. The development proposals for new housing at the land at Steyning Road site anticipate 3 storey buildings, which would be approximately 7m above the height of the new Adur Tidal Wall embankment (depending on existing ground level and the proposed design of the buildings).

7.3.8 The Sheils Flynn report, Adur Landscape Study Update – Shoreham Gateway, 2016 (CD14/12), states that the implementation of the Adur Tidal Walls scheme and the associated diversion and elevation of the Downs Link, will result in a more open riverside corridor, making the Steyning Road site *more visible and strengthening its role as part of the landscape setting of the River Adur, the settlement of Old Shoreham and the listed buildings of the Church of St Nicolas and the Shoreham Tollbridge (Page 17).*

It is noted that the drawings for the Adur Tidal Walls scheme show dense woodland planting on the inner (eastern) side of the new flood defence embankment and, if this form of planting were to be implemented, views across the site could eventually be partially screened. However, space for such planting is limited and it is not yet clear whether it will be feasible to implement woodland planting along the embankment of the Adur Tidal Walls as there are concerns that such planting may compromise the stability of the embankment. The Environment Agency's online Fluvial Design Guidance makes it clear that:

"Trees should not be planted on flood embankments as they accelerate drying out and cracking, and a breach of the bank may result if they are blown down in a storm"

At this stage, the Council assumes that any planting on the new flood defence embankment would be limited to low shrubs and that the new buildings would be prominent in local views.

- 7.3.9 To conclude, the Council considers that the prevention of the coalescence of settlements is a reasonable objective, justified by the evidence base. Policies 13 and 14 seek to deliver key components of the Local Plan's vision and objectives, and form an integral part of the plan's overall spatial strategy.