



BROOKLANDS RECREATION AREA POTENTIAL LOCAL GREEN SPACE DESIGNATION

Landscape Statement

by

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on behalf of

Worthing Borough Council

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A Looking north-east across Brooklands, from its south-east corner.

B Looking south-west to north-west across Brooklands, from internal car park.

C Looking south-east from north-western corner of Brooklands.

Appendices

A Extract from Adur and Worthing Open Space Study, Open Space Standards Paper, 2014

B Havant Borough Council, Local Green Spaces in Havant Borough, October 2013

C Extract from Cheltenham Borough Council, Local Green Spaces Study Report, January 2015

1 INTRODUCTION

1.1 Background

1.1.1 The Government introduced Local Green Space designations in its 2012 National Planning Policy Framework (NPPF). The designation is intended to protect green spaces which are of particular importance to local communities.

1.1.2 Worthing Borough Council has commissioned Hankinson Duckett Associates (HDA) to undertake an appraisal of the landscape suitability of the Brooklands Recreation Area for designation as a Local Green Space. HDA is familiar with the area, having carried out a Borough-wide Gap and Landscape Capacity Study in 2007, and the Landscape and Ecology Study of Greenfield Sites in Worthing Borough in 2015 and 2017.

1.2 Brooklands Recreation Area

1.2.1 The Brooklands Recreation Area is located at the south-east corner of Worthing Borough, in the gap between the urban areas of East Worthing to the west, and Lancing to the east. The area abuts the A259 along the coast to the south, and its northern extent is defined by the 'West Coastway' railway line.

1.2.2 The boundary of the Brooklands Recreation Area is set out on the Worthing Core Strategy Proposals Map 2011, and includes the Brooklands Park within the central and southern parts of the area, and an area of overgrown scrub and trees to the north, including 'land at Dale Road, which was assessed as Low/Medium suitability for development in the Landscape and Ecology Study of Sites in Worthing (see plan HDA 1). In total, the Brooklands Recreation Area measures approximately 30ha.

1.2.3 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 conurbations current extent. The Brooklands Recreation Area forms the remaining gap between East Worthing and Lancing.

1.2.4 The Brooklands Recreation Area was used as landfill by the Council until it was reclaimed in the late 1950s. Brooklands Park now includes a lake, and a number of sports and leisure facilities such as a miniature railway, children's playground, boating, tractor rides, nine hole Par 3 golf course, pitch-n-putt, a putting green, a go-kart track and paddling pool. There are informal amenity open spaces, mature trees and planting, car parking and provision for a café (see photographs A and B). Brooklands Park is currently undergoing environmental improvements, including enhancements to the lake, with dredging, trees

planted on the island and a boardwalk created over new reed beds in the margins. A bank to attract nesting and feeding Kingfishers and Sand Martins is also to be created. In 2017 a 'friends of Brooklands' community group was established, and in early 2018, local residents were consulted about plans to create a management plan for the park.

1.2.5 Landfill within the northern portion of the Brooklands Recreation Area, known as 'land at Dale Road' has yet to be reclaimed, and is overgrown with scrub and mature trees (see photograph C).

1.3 Gap Policy

1.3.1 Until relatively recently, Brooklands Recreation Area was afforded protection from development through its designation as part of a 'Strategic Gap'. The purpose of this was to prevent coalescence between settlements. The area abuts development to the east and west, and forms the remaining separation between Worthing and Lancing, with the southern portion maintaining an undeveloped coastline between the two settlements. The importance of the area was recognised in the Worthing Gap and Landscape Capacity Study, prepared by HDA on behalf of Worthing Borough Council in 2007, which recommended retaining the area as a Strategic Gap. .

1.3.2 Since the adoption of the Core Strategy in 2011, the Strategic Gap policy no longer exists in Worthing Borough. However, Brooklands Park is outside the built up area of Worthing and classified as countryside. The area is protected from major development by Policy LR4 saved from the Worthing Local Plan 2003. The policy states that development in Brooklands will not normally be permitted unless all the following criteria are met:

- (i) development is for recreational and/or landscape enhancement purposes;
- (ii) any new access is taken from Western Road and/or the existing access road;
- (iii) there is no significant adverse impact on nearby residents;
- (iv) adequate investigations and measures have been taken to deal with contaminated land and potential for landfill gas emissions;
- (v) the proposal complies with all other relevant policies.

1.3.3 Although the NPPF, introduced in 2012, does not provide the strategic gap 'policy hook' that county Structure Plans had under the previous planning system, a number of Local Plans have nevertheless designated Local Gaps, including in adjoining Adur. Policy 14 concerning Local Green Gaps states that Local Green Gaps between the settlements of Lancing/Sompting–Worthing, and Lancing-Shoreham-by-Sea, (as shown on the Policies Map), will be protected in order to retain the separate identities and avoid coalescence of these settlements. Within these areas any development permitted must be consistent with other policies of this plan, and must not (individually or cumulatively) lead to the

coalescence of settlements. Adur's Local Green Gap between Lancing/Sompting and Worthing abuts Brooklands Recreation Area on the opposite side of the railway to the north.

1.4 Local Green Space designations

National Planning Policy Framework

1.4.1 Paragraph 76 of the National Planning Policy Framework (NPPF) explains that "Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space, local communities will be able to rule out new development other than in very special circumstances". It adds that "Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period".

1.4.2 The NPPF criteria for the creation of a Local Green Space designation is set out at paragraph 77, and states that the designation should be used:

- Where the green space is in reasonably close proximity to the community it serves.
- Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife.
- Where the green area concerned is local in character and is not an extensive tract of land.

1.4.3 Once an area has been designated as a Local Green Space, it would have protection consistent with areas of Green Belt. Paragraph 78 of the NPPF states that "Local policy for managing development within a Local Green Space should be consistent with Green Belt policy". There are currently no existing areas of Green Belt within Worthing Borough, however, Green Belt policy is intended to prevent urban sprawl by keeping land permanently open, and any development within the Green Belt should only be permitted in very special circumstances.

Planning Practice Guidance

1.4.4 The Government's 'Open space, sports and recreation facilities, public rights of way and local green space' Planning Practice Guidance (PPG) includes key guidance and background to the Local Green Space designation.

1.4.5 Paragraph 006 of the PPG explains that the Local Green Space designation is for use in Local Plans or Neighbourhood Plans to designate green areas for special protection. It adds that "Anyone who wants an area to be designated as Local Green Space should contact the local planning authority about the contents of its local plan or get involved in

neighbourhood planning”. Paragraph 009 states that “Local Green Spaces may be designated where those spaces are demonstrably special to the local community, whether in a village or in a neighbourhood in a town or city”. Paragraph 008 explains that “Local Green Space designation will rarely be appropriate where the land has planning permission for development. Exceptions could be where the development would be compatible with the reasons for designation or where planning permission is no longer capable of being implemented”.

Relationship to other designations

- 1.4.6 The PPG recognises that the Local Green Space designation is one of a number of countryside/environment designations, and notes that each is intended to achieve different purposes (paragraph 011). If an open space already has a designation, such as National Park, Site of Special Scientific Interest or conservation area, or is subject to policies such as Green Belt or Strategic Gap, Local Green Space may still be appropriate as an extra designation, provided additional local benefit would be gained from the designation. In areas already protected from development, such as those covered by Green Belt policy, paragraph 010 comments that the “addition of a Local Green Space designation could help to identify areas that are of particular importance to the local community”.

Ownership and management

- 1.4.7 Land covered by a Local Green Space can be publicly or privately owned. Paragraph 019 of the PPG states that where land to be designated is privately owned, the local planning authority (in the case of local plan making) should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space. Landowners will have opportunities to make representations in respect of proposals in a draft plan.
- 1.4.8 Management of land designated as Local Green Space will remain the responsibility of its owner. Paragraph 020 of the PPG comments that “designating a green area as Local Green Space would give it protection consistent with that in respect of Green Belt, but otherwise there are no new restrictions or obligations on landowners”. Paragraph 021 adds that “if the features that make a green area special and locally significant are to be conserved, how it will be managed in the future is likely to be an important consideration. Local communities can consider how, with the landowner’s agreement, they might be able to get involved, perhaps in partnership with interested organisations that can provide advice or resources”. The guidance also notes that Local Green Spaces could be nominated for listing by the local authority as an Asset of Community Value.

Suitability

- 1.4.9 The Government’s ‘Open space, sports and recreation facilities, public rights of way and local green space’ PPG expands on the criteria set out at paragraph 77 of the NPPF, and

gives some further advice on the suitability of green spaces for designation as Local Green Spaces.

1.4.10 The guidance notes that while the green space will need to meet the NPPF criteria, whether to designate land is a matter for local discretion, and adds that green areas could include spaces which provide a tranquil oasis within an otherwise urban area. The PPG comments that the proximity of a Local Green Space to the community it serves will depend on local circumstances, but in most cases should be within walking distance.

1.4.11 Paragraph 015 of the guidance states that “There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgment will inevitably be needed”. However, blanket designations of countryside would not be appropriate, and should not be used as an alternative to Green Belt policy.

1.4.12 The level of public access to an area does not affect its suitability for designation as a Local Green Space. Paragraph 017 explains that some suitable areas may have unrestricted access, or be crossed by public rights of way (paragraph 018). Other areas may have no public access, but could still be appropriate for designation due to their wildlife, historic or beauty value.

Designation precedence

1.4.13 A number of Local Green Space designations have been proposed through the local plan process of other authorities, and in general have been successfully designated. Similar to Worthing, Havant Borough Council is a relatively small, mainly urbanised authority, on the south coast, to the west of Worthing, and was early to introduce the new designation into its Local Plan process. Havant has designated a number of Local Green Spaces across the Borough, which are identified on The Havant Local Plan interactive policies map. Local Green Spaces were nominated by the local community as part of the public consultation on Havant’s Draft Allocations Plan published in December 2012, and open spaces designated under CS1 of Havant’s Core Strategy have also been designated as Local Green Spaces. 40 sites were considered, 20 of which were approved. The methodology used by Havant Borough Council is included at Appendix B.

1.4.14 Cheltenham Borough Council worked with local communities between October 2014 and January 2015 to undertake a Local Green Spaces Study, enabling the extent of each Local Green Space to be informed by local groups. Over 110 sites were initially considered, and 29 of those sites, some larger than the Goring Gap sites, were then assessed in more detail using a ‘Local Green Spaces toolkit’. The process to designate those sites is ongoing as part of the wider Cheltenham Local Plan process. Extracts of Cheltenham Borough Council’s Local Green Spaces Study Report are included at Appendix C.

1.4.15 Local Green Spaces can also be proposed through Neighbourhood Plans. As a small non-parished borough, communities within Worthing have not undertaken neighbourhood plans and therefore the proposed Goring Gap Local Green Space sites are being proposed directly through Worthing's Local Plan. However, Local Green Space Designations of various sizes have been considered through a number of neighbourhood plans, including 11 sites within the Farringdon Neighbourhood Plan, and 10 sites within the Walberton Neighbourhood Plan, the majority of which have now been successfully designated.

Local Green Space designations in practice

1.4.16 As a relatively new designation, there are limited examples of testing how the protection offered by Local Green Spaces would work in practice. However, the NPPF is clear in that local policy for managing development within a Local Green Space should be consistent with Green Belt policy, meaning that the area should be kept 'permanently open' and that any development within a Local Green Space should only be permitted in very special circumstances. It is likely that open space recreational uses which are consistent with the aspirations of the Local Green Space, such as maintaining openness or adding to the recreation value of the space, could be considered as acceptable development within a Local Green Space. For instance, pavilions or small cafes could provide a recreational hub in Local Green Spaces which are special to local communities for their recreational value.

1.4.17 The Open space, sports and recreation facilities, public rights of way and local green space PPG, sets out that representations in respect to Local Green Space designations can be made at the time of a draft local plan (or neighbourhood plan) in which the designation is included. This implies that the designation could be reassessed or challenged as part of the process for preparing subsequent plans, in a similar way to the review of Green Belt boundaries as part of local plan review.

1.4.18 In some instances, proposed Local Green Space designations have been the subject of legal challenges, including in particular from developers. For example, Persimmon Homes employed legal representation to successfully challenge a proposed Local Green Space at Farleigh Fields as part of the Backwell Neighbourhood Plan, with the Neighbourhood Plan Examiner concluding that sufficient evidence to demonstrate that the proposed allocation met national policy requirements had not been presented.

1.4.19 Persimmon Homes also challenged the Local Green Space designations proposed as part of the North Somerset policy framework. The Inspector's Report on the Examination of the North Somerset Sites and Polices Plan Part 2: Site Allocations Plan sets out that although there were a significant number of Local Green Space designations proposed, they majority meet the national criteria. However, two sites were rejected. One site at Brookfield

Walk is within an area of Green Belt and it was considered that a Local Green Space designation did not offer appropriate additional protection, and the second site at May Day Field was considered not to be demonstrably special to the local community.

- 1.4.20 The Inspector's report on the Examination of the North Somerset Sites and Policies Plan Part 2: Site Allocations Plan concluded that ““Whilst the aim of designation is to provide long term protection, there will be an opportunity to review the designations and to ensure that they remain consistent with the planning of sustainable development in the light of the new strategy which is being brought forward...”

2 RELEVANT LOCAL LANDSCAPE EVIDENCE

2.1 Introduction

- 2.1.1 Information from local groups and interest parties which is relevant to the suitability of Brooklands Recreation Area as a Local Green Space is set out below. Additionally, appropriate information from an Open Space Assessment, and the Issues and Options Consultation, which are both part of the evidence base for the Worthing Local Plan, are also summarised.

2.2 Friends of Brooklands Park

- 2.2.1 The Friends of Brooklands Park group was established in 2017 to help maintain the park and have a say in its future direction. The group has held meetings attended by approximately 50 people to discuss the role of the group, progress of the environmental improvements and liaison with Worthing Borough Council. In February 2018, the group organised the removal of litter and other rubbish from the park.

2.3 Brooklands Park public consultation

- 2.3.1 An online consultation with local residents regarding plans to create a management plan for Brooklands Park, including the northern overgrown area off Dale Road, was carried out in early 2018. Over 800 people responded to the consultation, giving their views on the Brooklands Recreation Area. Worthing Council was pleased with the high number of local residents who took part in the survey, and noted that “*This project has received so much positive community engagement...*”.

- 2.3.2 Results from the consultation included:

- A high percentage of visitors to the park were families with small children
- The main reason for visiting was to use the play area or go for a walk
- The average visit length was between one and two hours
- Many respondents referred to the park as ‘beautiful’ or ‘nice’

2.4 Brooklands Informal Bird Species List

2.4.1 Ducks, coots, swans and cormorants are a common sight on Brooklands Lake, within the park, which is likely to be an important site for waterfowl. A species list of the birds which use Brooklands Park is being compiled by local residents and from the Sussex Ornithological Society's sightings.

2.5 Sussex Biodiversity Record Centre

2.5.1 The Sussex Biodiversity Record Centre holds extensive data for species recorded within the area, including European Protected Species, and Biodiversity Action Plan priority species. Records for the area include several species of bats and a significant number of bird species, as well as protected species such as Adder, Common Lizard and Grass Snake.

2.6 Adur and Worthing Open Space, Playing Pitch and Indoor Sports Study

2.6.1 In 2014, an Open Space Standards Paper was prepared on behalf of Adur and Worthing Councils, as part of a wider Open Space, Playing Pitch and Indoor Sports Study, to inform its Local Plan. The study assesses the amount of open space provision within Worthing, against target standards to determine whether there is a surplus or deficiency of different types of open space within the Borough. Table 10.5 (see Appendix A) identifies that there is a total of 268.403ha of natural and semi-natural greenspace in the Borough, and 81.329ha of amenity greenspace. Table 10.6 (see Appendix A) compares these figures for existing provision to provision targets. Both natural/semi-natural greenspace, and amenity greenspace, are below the target figures, and therefore there is a deficiency of these types of Open Space within the Borough overall.

2.6.2 An Open Space Assessment Report was also prepared in 2014, which details the findings of the research, consultation, site assessments, data analysis and GIS mapping that underpins the wider study. This report identifies the following:

- Brooklands Lake has a quality score of 82% and value score of 29% for its provision of natural or semi-natural open space (one of the highest scoring sites for quality in Worthing),
- Brooklands Pleasure Park North with a quality score of 59% and value score of 39% for its provision of amenity space,
- Brooklands Pleasure Park Play Area with a quality score of 76% and value score of 44% for its provision for children and young people (one of the highest scoring sites for quality and recognised for having equipment that is wheelchair accessible).

2.7 Issues and Options Consultation

2.7.1 The Issues and Options (I&O) stage of the next Worthing Local Plan for Worthing involved consultation undertaken in May and June 2016. Responses to the I&O consultation are set

out in a Summary of Representations, which should be read in conjunction with an I&O Consultation Report dated August 2016.

2.7.2 The Summary of Representations records that 210 respondents (over 80% of the total 261 people/groups who responded to the I&O consultation), argued strongly that all greenfield sites should be protected from development. Many respondents suggested that these areas should provide both informal and formal green infrastructure, and could be designated in a number of ways, including Local Green Space Designation.

2.7.3 35 respondents commented on the Environment, highlighting that the seafront and gaps are particularly sensitive to development, and agreed that green spaces in and around the town are highly valued.

3 WORTHING LANDSCAPE AND ECOLOGY STUDY (2015 & 2017)

3.1 Introduction

3.1.1 The site specific Worthing Landscape and Ecology Study prepared by HDA in 2015, and updated in 2017, considered the landscape and ecology suitability of sites for development within the Borough, including the land at Dale Road, within the northern part of the Brooklands Recreation Area. The area was assessed against various landscape considerations, including the local landscape context, landscape structure, landscape character, settlement pattern and visibility. This analysis fed into tabulated sensitivity and value assessments, which when combined, using an inverse matrix, resulted in an overall suitability rating. The study then recommended potential green infrastructure proposals for the area.

3.1.2 The analysis and assessment contained within the Landscape and Ecology Study details the landscape qualities and sensitivities of the northern part of the Brooklands Recreation Area. Extracts from the study are included below. A number of the sensitive landscape issues related to the land at Dale Road also apply to the wider Brooklands Recreation Area, including Brooklands Park to the south, such as its built up context, location along the coastal plain, and its important function as separation between Worthing and Lancing.

3.2 Land at Dale Road (northern part of Brooklands Recreation Area) Landscape Structure

3.2.1 The site is underlain by clay, silt, sand and gravel solid geology, with sand and gravel drift geology. The site is a former landfill site, it has uneven areas and mounding, but is generally flat, raised up above the surrounding flood zone.

3.2.2 To the south, the site abuts an industrial estate and sewage works within the 'Built Up Area' of Worthing, and to the north-east the site abuts the housing off St Paul's Avenue

and St Luke's Close within the built up area of Lancing. The northern edge of the site is bounded by the Southern 'West Coastway' railway line which is raised on a slight embankment above the flood zone. Adjacent to the south-east is the northern end of the recreation area located within the gap between Worthing and Lancing. To the west are the Chesswood allotments. The Teville Stream flows south-east along the western site boundary, before going underground within the vicinity of the industrial estate and sewage works.

- 3.2.3 The site is covered with scrub and young self-set trees, and there is evidence of fly-tipping. There is dense boundary vegetation including conifer trees, particularly to the north and west. However, the southern boundary, marked by a chain link fence adjacent to the industrial area, is more open.

Landscape Character

- 3.2.4 The site is located within the 'Worthing and Adur Fringes' county landscape character area (area SC13), and the 'Brooklands Lower Coastal Plain' local landscape character area, characterised by relatively flat, low lying landscape used for recreation and waste treatment. The key aim of the Land Management Guidelines of area SC13 is to restore and strengthen the landscape of the gaps between settlements. The guidelines include:

- Strengthen the landscape framework and filter views of the urban edge through planting of woodland, tree and shrub belts and groups. Use these to screen and unify disparate suburban elements especially along roadside verges, village edges and around glasshouses.
- Establish landscape management plans for urban edges.
- Maintain and strengthen existing field boundaries such as hedgerows and shelterbelts. Conserve and link existing hedgerows and trees with new planting.
- All new planting to be of coastal tolerant plants which are adapted to the maritime winds.
- Establish new areas of planting through the creation of sheltered areas using sympathetic measures, such as low stone walls and earth mounds, and nurse species for wind protection.
- Create a new large scale tree and hedgerow framework to complement the open, intensively farmed landscape, whilst maintaining important views.
- Restore field boundaries through shelterbelt planting, especially around horse paddocks.
- Maintain and enhance the landscape and biodiversity of rife and other existing wetland habitats such as salt marsh, mud flats and water meadows.
- Encourage and promote land management schemes to increase species rich grassland areas.
- Carry out colour and design studies for industrial and large farm buildings.

- Encourage landscape enhancements around villages and on their approaches.
- Conserve, manage and enhance existing village ponds.
- Encourage the creation of new suburban woodlands, preferably with community involvement, for recreation and to link up with existing woodlands.
- Encourage bold tree planting adjacent to roads to enhance both the visual and wildlife value of these areas.
- Encourage conservation and community involvement in urban spaces and village greens.

3.2.5 The site itself is a former landfill site and despite not being used since the 1960s, the site has been subject to more recent fly-tipping, which combined with overgrown scrub, gives the site a derelict unkempt appearance and character. Boundary and internal vegetation help provide a sense of enclosure in places.

Settlement Pattern and Gap Function

3.2.6 Worthing has developed overtime along the coastal plain, with the settlement spreading eastwards towards Teville Stream. Little Chesswood Farm turned to allotments in the 1920s, and housing began to replace horticulture to the west of the allotments in the 1940s. However, the eastern edge of Worthing has consistently been limited by the Teville Stream. Lancing has spread westwards to Worthing more recently, with railway works replaced by housing after the 1960s and further housing spreading along the southern edge of the railway to the current extent of the conurbation.

3.2.7 A gap of varying width has remained between the 'Built Up Areas' of the two settlements. To the south of the railway the gap is largely occupied by recreational uses, including the Brooklands Pleasure Ground, with its lake, miniature railway, mini golf, playgrounds and associated car parking. To the north of the recreation ground, the site forms the remaining separation between Lancing and the allotments located on the eastern edge of Worthing.

3.2.8 When viewed from the north, including from Loose Lane and public rights of way within the South Downs National Park, the fields to the north of the railway provide the main visual separation between Worthing and Lancing/Sompting. However the site and recreational area to the south provide a gap in development along the lower coastal plain and prevent coalescence along the coastline between the two settlements.

Visual Assessment

3.2.9 The centre of the site is relatively well contained locally by vegetation along and nearby the site boundaries. However, dwellings located at the western ends of St Paul's Avenue and St Luke's Close overlook the north-east corner of the site.

- 3.2.10 The northern site boundary is visible from the railway and there are views of the site vegetation from the adjacent allotments, the northern end of Dale Road, the eastern end of Willowbrook Road, and from the elevated railway bridge along Western Road. There are more limited glimpses of site vegetation from the recreation ground to the south-east. Although the ground of the site itself is not visible from these locations, if the site was developed with housing, there is potential for the roof tops to be visible.
- 3.2.11 The northern site boundary, including conifer trees, is visible at varying distance, between Worthing to the west and Lancing to the east, from locations to the north, including from Loose Lane and from public rights of way within the National Park. The ground of the site itself is not visible from these locations, however if the site was developed with housing, there is potential for dwellings to be visible in a similar manner to the existing development either side of the site.
- 3.2.12 The Landscape and Ecology Study judged the land at Dale Road to have a 'Substantial' degree of visual sensitivity.

Sensitivity

- 3.2.13 The Landscape and Ecology Study takes the visual sensitivity of the land at Dale Road and combines it with consideration of other criteria as follows to determine an overall sensitivity of the area:
- Inherent landscape quality (intactness and condition)
 - Ecological sensitivity
 - Inconsistency with existing settlement form/pattern
 - Contribution to separation between settlements
 - Contribution to the setting of surrounding landscape/settlement
 - Views (visual sensitivity)
 - Potential for mitigation
- 3.2.14 As well as having substantial visual sensitivity, the northern gap area was judged to have particularly high sensitivity in terms of its function as undeveloped green space between the settlements of Worthing and Lancing. The land at Dale Road was judged to have substantial sensitivity in relation to its contribution to the setting of the surrounding landscape and settlement, due to the areas function as a treed edge to adjacent settlement, and a treed backdrop in views from the rural landscape to the north. The area was also considered to have substantial sensitivity in terms of the potential for mitigation due to the difficulty to mitigate against the effects development within the gap would have upon the other criteria within the assessment, most notably the adverse effect on the separation between settlements.

3.2.15 Overall, taking into account all of the above criteria, the sensitivity of the majority of the northern gap area was considered to be 'Substantial'.

Value

3.2.16 The Landscape and Ecology Study also determines the landscape value of the land at Dale Road by combining consideration of the following criteria:

- Landscape designations
- Other designations including ecology and heritage, and flood zone
- Local distinctiveness
- Historical/cultural/literary associations
- Contribution to the setting of 'outstanding assets'
- Recreation and public access
- Perceptual aspects such as scenic beauty, tranquillity and remoteness

3.2.17 The land at Dale Road is relatively distant from the National Park, has no formal public access, and due to its land use and setting, has limited scenic beauty, tranquillity or sense of remoteness.

3.2.18 Overall, taking into account all of the above criteria, the value of the land at Dale Road was considered to be 'Slight'. Combining the judgements of Substantial sensitivity and Slight value, resulted in a 'Low/Medium' landscape suitability for development on land at Dale Road. The Landscape and Ecology Study concluding that built development in this area, such as housing, would have a detrimental effect on the separation between settlements, and the character of the landscape as a whole, as well as affect views south from the South Downs National Park. Formal or informal open space proposals would have a limited effect on views from the National Park, and could be a more appropriate use of the site than built development.

Green Infrastructure

3.2.19 Based on the above assessment, the Landscape and Ecology Study set out the following green infrastructure recommendations:

- Maintain site as undeveloped, or as open green space with retained/enhanced boundary planting to conserve separation between East Worthing and Lancing.
- Maintain and enhance boundary vegetation.
- Potential for remediation of landfill to provide open space recreational use as extension to recreation ground to the south, provided boundary and internal tree cover is maintained/enhanced to maintain a sense of separation between East Worthing and Lancing, including when viewed from the National Park.
- Potential for new footpath routes across the site, linking the recreation ground to the east with Dale Road to the west.

- Potential for new hedge and trees along southern boundary.
- Removal of invasive species such as Japanese knotweed and address ground contamination from landfill if appropriate.

4 LOCAL GREEN SPACE DESIGNATION SUITABILITY

4.1 Introduction

4.1.1 The suitability of an area for designation as a Local Green Space is primarily judged against the three main criteria outlined in the NPPF, and supported by The Government's 'Open space, sports and recreation facilities, public rights of way and local green space' guidance. This section considers the potential for designating the Brooklands Recreation Area as a Local Green Space, against each of the main criteria, incorporating the evidence and assessments described above as appropriate.

4.2 Proximity to the community

4.2.1 The first part of the NPPF Local Green Space criteria states that the Local Green Space designation should only be used where the green space is in reasonably close proximity to the community it serves. The Brooklands Recreation Area meets this criteria, being adjacent to a significant conurbation along the coastal plain.

4.2.2 The Brooklands Recreation Area abuts the residential area of East Worthing to the south-west, and housing along the western edge of Lancing, which abuts the entire eastern edge of the Recreation Area. Results from the Brooklands Park public consultation indicated that the park is well used by families with small children for visiting the play area, or for going for a walk.

4.2.3 Attractions such as the miniature railway and go-karting, also draw additional visitors from further afield, with the car parking aiding visits by car.

4.3 Special qualities and local significance

4.3.1 The second part of the NPPF criteria sets out that the designation should only be used where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife. The Brooklands Recreation Area is both demonstrably special, and has local significance.

Demonstrably special to local communities

4.3.2 The recent creation of the Friends of Brooklands Park group, which has held well attended meetings and events such as litter picking, demonstrates the special regard which the local community has for the area. This is reinforced by the Brooklands Park public consultation, which attracted responses from over 800 people.

4.3.3 The specialness of the green spaces within Worthing as a whole, is demonstrated by the comments made by local individuals/groups, as part of the I&O consultation process. Over 80% of the total respondents to the Borough-wide consultation argued strongly that that all greenfield sites should be protected from development, should be utilised for both informal and formal green infrastructure, and could be designated in a number of ways, including as Local Green Spaces. A number of respondents also commented that the seafront and gaps are particularly sensitive to development, and that green spaces are highly valued.

Local significance

4.3.4 The Brooklands Recreation Area is highly significant to the local community, and meets not just one, but a number of the significance examples noted in the NPPF criteria, including recreational value in particular. Brooklands is considered by local communities to be valued for its beauty, and as enhancements to Brooklands are implemented, it's richness of wildlife will also be increased.

Local significance: recreational value

4.3.5 Brooklands Park is a well-used recreational resource. The park contains a miniature railway, children's playground, boating, tractor rides, nine hole Par 3 golf course, pitch-n-putt, a putting green, a go-kart track and paddling pool. There are informal amenity open spaces, mature trees and planting, car parking and provision for a café.

4.3.6 The Brooklands Park public consultation, which received over 800 responses, also identified that another main reason for visits to the park, is to simply go for a walk.

4.3.7 The recreational value of the Brooklands Recreation Area is particularly important given the deficit of natural/semi-natural greenspace and amenity greenspace in Worthing Borough as a whole, as identified in the 2014 Open Space Standards Paper prepared on behalf of Adur and Worthing Councils, and summarised in section 2 above.

Local significance: richness of wildlife

4.3.8 The Brooklands Recreation Area contains a mixture of wildlife habitats, including waterbodies and their margins, such as the lake and Teville Stream, tree groups, areas of scrub, and grassland. The lake within Brooklands Park is a wetland habitat for waterfowl, and is currently undergoing improvements to enhance its wildlife value, including creation of islands with tree planting, new reed beds, and a bank to attract nesting and feeding birds.

4.3.9 The ecological assessment of land at Dale Road contained within the 2015 & 2017 Worthing Landscape and Ecology Study, identified that the watercourses along the

northern and western edges of the area, including Teville Stream, and their associated corridors of semi-natural habitats, have wildlife value of district significance. The mosaic of scrub and tall ruderal habitats are considered to have wildlife value, given that they are relatively scarce in the wider area, and provide opportunities for a range of species. The deciduous and coniferous trees and native boundary hedgerows within the northern part of Brooklands Recreation Area are also valued as habitats for a range of species, compliment other habitats in the area, and provide opportunities for the movement of wildlife through the local area.

- 4.3.10 Habitats within the Brooklands Recreation Area are also likely to be of benefit to European Protected Species and Biodiversity Action Plan priority species recorded in the local area by the Sussex Biodiversity Records Centre.

Local significance: beauty

- 4.3.11 The importance of the Brooklands Recreational Area to the local community in terms of local beauty is highlighted by responses to the Brooklands Park public consultation, with people considering the park to be 'beautiful' or 'nice'. On-going enhancements to the lake, and a developing management plan, will enhance the appearance of the park further.

- 4.3.12 Brooklands Park is a well maintained green space, with a pleasant lake, attractive tree cover and planting, open space, and interest from varying landform. The Recreational Area forms an attractive gap in the conurbation along the coast, providing a relief from the surrounding residential and industrial areas. The area forms an open green setting to the undeveloped coastline to the south, with visual connectivity between the park and the shore. Brooklands Park is also identifiable from elevated ground to the north, including within the National Park, and forms a green break in the view of development along the coastline.

- 4.3.13 The Worthing Landscape and Ecology Study states that the land at Dale Road, within the northern extremity of Brooklands Recreation Area has limited scenic quality, largely due to its internal land use and derelict unkempt appearance. This is likely to be remedied over time with the area incorporated into the wider improvement strategy for the Brooklands Recreation Area.

Local significance: tranquillity

- 4.3.14 The NPPF addresses tranquillity at paragraph 123, stating that planning policies should aim to "identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason".

4.3.15 Traffic along the adjoining A259 and Western Road, is an obvious detraction which limits the sense of tranquillity within the southern and eastern areas of the park. However, central and northern parts of the Brooklands Recreation Area, have significant tree cover which buffers the area from surrounding urban influences and provides enclosure, particularly within the summer months. Although tempered by occasional human activity, areas within the tree cover have a feeling of intimacy, and a greater sense of tranquillity than surrounding urban areas, and provide as a relief from the built up conurbation along the coastal plain, where there is a deficit of similar open space.

4.4 Local in character and not an extensive tract of land

4.4.1 The third and final part of the NPPF Local Green Space criteria states that Local Green Space designations should only be used where the green area concerned is local in character and is not an extensive tract of land.

4.4.2 Whilst the NPPF criterion state that a Local Green Space should not be an extensive tract of land, it does not indicate what constitutes an extensive tract. The Government's 'Open space, sports and recreation facilities, public rights of way and local green space' guidance gives some further advice on the suitability of green spaces for designation as Local Green Spaces. Paragraph 015, Reference ID 37-015-20140306, comments that "There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgment will inevitably be needed" and that "...blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name".

4.4.3 Although this relatively broad criteria is open to interpretation, the NPPF criteria and the size suitability of specific green spaces for designation as Local Green Spaces, have been tested through the local and neighbourhood plan process of other authorities. The adopted Havant Borough Council Local Plan includes a number of Local Green Spaces, including sites which are approximately 40ha (Queens Inclosure) and 62ha (Hollybank Woods). Areas within Havant which were considered too extensive for designation as Local Green Spaces include Hayling Beach, which stretches approximately 3 miles in length. Applications to the Cheltenham Borough Local Plan for Local Green Spaces designations include sites of approximately 46ha (Leckhampton Fields) and 48ha (Swindon Village Fields).

4.4.4 The Brooklands Recreation Area is approximately 30ha in area, however there is precedence for larger sites being designated through the local plan processes of other areas and authorities. These include the 62ha site at Hollybank Woods in Havant, and sites identified for the Cheltenham Borough Local Plan which include sites of approximately 46ha and 48ha. The government guidance does not state a maximum size,

“because places are different and a degree of judgment will inevitably be needed” and explains that “...blanket designation of open countryside adjacent to settlements will not be appropriate”. Therefore the size of individual applications need to be considered in their local context.

4.4.5 A larger area does not necessarily translate into an ‘extensive tract’ of land. For example, Humpty Hill which measures 5.6ha was recommended for deletion from the Faringdon Neighbourhood Plan at Examination as it was considered to be an extensive tract of land by the Examiner. However larger sites, including Fontwell Meadows which measures 9.75ha, and Tupper’s Field which measures 11.2ha, were accepted by the Examiner of the Walberton Neighbourhood Plan as appropriate for Local Green Space designation and not extensive tracts of land given their context.

4.4.6 The Examiner of the Walberton Neighbourhood Plan states that “There does not appear to be any direct legal authority on the definition of an “extensive tract of land”. The word “extensive” is defined in the Oxford Dictionary as “having a wide extent”. Other attributable meanings are “uncircumscribed”, “expanse”, “unlimited space”. In planning terms the phrase “extensive tract” is usually used in connection with land to be designated as national parks. In my judgment it is apparent from the planning perspective that the definition of an extensive tract of land means large areas of the countryside.”

4.4.7 In rejecting the smaller Humpty Hill site, the Examiner of the Faringdon Neighbourhood plan states that “The Guidance is very clear that ‘there are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgement will inevitably be needed’. On this basis it would be inappropriate to take an examiner’s judgement on proposed local green spaces elsewhere as a definitive guide on the extent to which Humpty Hill is or is not an extensive tract of land.”

4.4.8 Given the extent of the settlement along the coastal plain which the Brooklands Recreation Area serves, and the distance between East Worthing and Lancing required for the area to function as effective open space between the two settlements, the Brooklands Recreation Area would be an appropriate, meaningful size for a Local Green Space in this context. The area is a self-contained parcel of land with edges clearly defined by settlement to the east and west, the railway to the north and the A259 along the coast to the south, rather than an extensive tract of open, and undefined landscape.

5 CONCLUSION

5.1 As settlement within the Borough of Worthing, and adjoining Adur District has grown over time, Brooklands has remained as open space wholly within Worthing Borough, and become an important area for recreation.

- 5.2 The Brooklands Recreation Area was designated as a 'Strategic Gap' until the adoption of the Worthing Core Strategy in 2011. Despite no inclusion of national gap policy within the NPPF, local authorities have however continued to successfully create Local Gap Policies. Adur, which borders Worthing to the east, has created two Local Green Gaps through its own Local Plan process.
- 5.3 The Government's 'Open space, sports and recreation facilities, public rights of way and local green space' PPG explains that one open space designation does not preclude another one on the same area, provided additional local benefit would be gained from the designation.
- 5.4 Local Gap policy, as tested through Adur's Local Plan process, is intended to prevent coalescence between settlements, and permits development which 'would not undermine the physical and/or visual separation of settlements' or 'compromise the integrity of the gap'. Local Green Spaces are designated to protect the special qualities of spaces which are important to local communities, such as their beauty, historic significance or recreational value, and rule out development other than in very special circumstances. Land uses permitted within a Local Gap which could be considered to conserve the openness of the gap, for example a solar farm, would not be suitable in Local Green Spaces important for qualities such as recreation and landscape qualities of the land.
- 5.5 Therefore if Worthing was to pursue a Local Gap policy for the Brooklands Recreation Area, consistent with the approach of Adur on adjoining land to the north, this could complement a Local Green Space designation on the Brooklands site.
- 5.6 The NPPF sets out that adjoining local authorities have a duty to plan strategically across local boundaries, stating that "Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination". However, it is also feasible that the Brooklands Recreation Area could be designated as Local Green Space, while the adjoining land to the north within Adur is an area of Local Green Gap. In this event, the overall effect would be to maintain protection across the adjoining areas, however limited development appropriate to each designation could occur either side of the local authority boundary.
- 5.7 The Brooklands Recreation Area exhibits considerable special landscape qualities, serving East Worthing to the west and Lancing to the east. The area is particularly significant for its function in providing recreation, both formally with facilities such as play equipment, miniature railway and golf course etc, and informally as a place to walk, and exercise dogs.

The park is one of the few remaining stretches of open landscapes within the conurbation along the coastal plain, and has visual connectivity with the undeveloped coastline to the south and distant glimpses of the South Downs National Park on the horizon to the north. Brooklands Recreation Area has a range of habitats including wetland and tree groups, which not only have wildlife value, but also provide areas which are buffered from surrounding urban influences.

- 5.8 The creation of the Friends of Brooklands Park group, and the response of over 800 people to the Brooklands Park public consultation, indicates how the area has a particular significance to the local communities, in an area recognised as deficient in natural/semi-natural greenspace and amenity greenspace.
- 5.9 As set out above, Brooklands Recreation Area meets all the NPPF criteria, and has local significance in relation to several of the examples included in the criteria. Brooklands Recreation Area is adjacent to the community it serves, has considerable recreational value, is valued for its beauty and wildlife, and given the adjacent conurbation, provides a sense of relief from urban influences and has areas of relative tranquillity. The area is a well-defined parcel of land and not an extensive tract or blanket of countryside.
- 5.10 In conclusion, the Brooklands Recreation Area fully meets the criteria and is suitable for designation as a Local Green Space, and if designated could complement other potential open space designations or local gap policies on the site. Worthing Council should use the information set out above to inform its new Local Plan, and in combination with other evidence, determine the most appropriate designating or use of Brooklands Recreational Area.