

## LANDSCAPE COMMENTS

<b>TO:</b>	Gary Peck				
<b>FROM:</b>	Brian Duckett				
<b>DATE:</b>	17/11/2020	<b>REF:</b>	AWDM/1264/20		
<b>SUBJECT:</b>	Land north-west of Goring Station, Worthing.				
<b>PROPOSAL:</b>	Mixed use development comprising up to 475 dwellings along with associated access, internal roads and footpaths, car parking, public open space, landscaping, local centre (uses including A1, A2, A3, A4, A5, D1, D2, as proposed to be amended to Use Classes E, F, and Sui Generis) with associated car parking, car parking for the railway station, undergrounding of overhead HV cables and other supporting infrastructure and utilities. Seeking Outline Planning Permission.				
<b>RECOMMENDATION</b>	Objection				

### Relevant legislation, guidance, policies and evidence base;

- NPPF (2019); with particular reference to paragraphs 99,100, 170 and 172.
- Worthing Borough Council Core Strategy, Policies 13,14 and 16.
- Worthing Borough Council Draft Local Plan, Policies SP5, SP6, CP15 and CP16.
- The South Downs Partnership Management Plan 2020 - 2025.
- Landscape and Ecology Study of Greenfield Sites in Worthing Borough, Nov 2015.
- Landscape and Ecology Study of Greenfield Sites in Worthing Borough; Review of Low Suitability Sites, March 2017.
- Goring Gap Proposed Local Green Space Designations; Landscape Statement, June 2018.
- The South Downs National Park: View Characterisation Analysis report, Nov 2015, (the Viewshed Report)

### Documents and drawings reviewed:

- Site Layout as Proposed, dwg no. CMP-02-P6
- CSA Landscape and Visual Impact Assessment, July 2020
- Design and Access Statement, August 2020

- Arboricultural Opportunities and Constraints Assessment, August 2020

#### **Consultation responses reviewed:**

- South Downs National Park Authority Response, October 2020
- Ferring Parish Council Response, September 2020
- Worthing Society Response, September 2020
- National Trust Response, October 2020
- Arun District Council Response, September 2020
- CPRE Response October 2020

#### **Baseline Assessment**

The application site lies in undesignated landscape, close to the southern edge of the South Downs National Park, this edge being aligned with the A259. The site is the larger of two arable fields which lie between the A259 and the Brighton to Littlehampton railway line to the south. The arable fields, together with a small field to the west in neighbouring Arun District, form the locally termed, 'northern gap' between the settlements of Ferring and Goring by Sea.

The site is bound by sporadic vegetation of varying density including scrub and occasional groups of small trees, within or adjacent to the site's southern, eastern and western boundaries. Ferring Rife, a drainage ditch, forms the northern site boundary and has limited riparian vegetation which includes occasional shrubs and small trees. A line of pylons runs east-west through the middle of the site.

The site lies adjacent to existing development to the south, east and west, which includes a number of 3-storey buildings to the north-east and multi-storey flats to the south-east. Public footpath 2121 runs along the southern boundary of the site and footpath 2121/1 follows part of the western boundary.

#### **Landscape Character**

The site is located within the low-lying flat open landscape of the 'Littlehampton and Worthing Fringes' County Character Area (area SC11), of the West Sussex Landscape Character Assessment (reference Figure 6 of the Worthing Landscape and Ecology Study).

The accompanying land management guidelines for Area SC11 recommend restoring and strengthening the landscape, and include the creation of a new large-scale tree and hedgerow framework to complement the open, intensively farmed landscape, whilst maintaining important views.

At a local scale, the site forms part of the 'Goring Coastal Plain' local landscape character area (reference Figure 7 of the Worthing Landscape and Ecology Study). This area is characterised by open large-scale arable fields and extends to include

fields to the north and west of the site beyond the A259.

### **Visual Assessment**

The application site is open to view from Highdown Hill and its hill fort, a Scheduled Monument (SM), which lie within the South Downs National Park, and to the north of the site. The site forms a prominent part of the middle-distance landscape within views from the Hill including those from the SM and land managed by the National Trust. The gap between Ferring and Goring by Sea is seen in the context of existing settlement and the English Channel beyond, which forms the horizon.

The gap forms a noticeable break in the development to the north of the main railway line along the coastal plain. The open character of such views continues, in part, south of the railway line into the school playing fields to the south-east of the site. The site is also visible from high ground within the National Park, to the east of High Salvington, and, at a greater distance, from Cissbury Ring, which is a hill fort and Scheduled Monument within the National Park to the north of Worthing.

At closer range, the site is open to view from footpaths 2121 and 2121/1 and from the A259. Although views are partially filtered by vegetation in places, it is also visible from properties which face onto the area and from the railway. In these more local views the site makes a substantial contribution to the sense of openness and separation between the settlements of Goring by Sea and Ferring.

There are uninterrupted views to the National Park, including Highdown Hill from public footpath 2121 along the southern edge of the application area, in which the site forms a significant part of the extensive open and agricultural foreground setting to the National Park and Highdown Hill.

### **Sensitivity to development**

The Landscape and Ecology Study (2017) assessed the majority of the northern gap, which includes the application site, as having a 'Major' degree of visual sensitivity. A small part of the south-west corner of the northern gap, where it adjoins with Arun District to the west, is partially contained to the north by vegetation, and forms a less prominent part of the visual separation between Goring and Ferring. The south-west corner of the northern gap was therefore considered to have 'Moderate' visual sensitivity.

In addition to a largely high visual sensitivity, the northern gap, including the application site, was judged to have high sensitivity in terms of its function as an open landscape between the settlements of Goring and Ferring. The gap (including the site) was judged to have substantial landscape sensitivity in relation to its contribution to the open

character and setting of the surrounding landscape and settlement.

### **Assessment of Application Proposals**

The application site lies outside current settlement boundaries as set out in the Adopted Local Plan and its suitability for development was considered as part of a review of low suitability sites in 2017 (as referenced above). The recommendations of that reassessment of sites were that limited development to the south-west corner of the northern gap (including a small portion of the application site) would be acceptable for development, in landscape and visual terms, given that the main views into and out of the gap would be maintained and that the majority of the land within the gap would be retained as open agricultural land. The review noted that in relation to potential development on that corner of the gap the setting to the National Park, its heritage assets and the relationship between the landscape of the National Park and the settlement on the coastal plain would be largely unaffected.

The current application proposals far exceed the extent of development anticipated in the 2017 review. The application site extends east-west over the full extent of the gap between settlements. The development, allowing for the retention of the field to the north as proposed, would seriously erode the sense of separation between the settlements that the current land uses provide.

The tenor of the draft Local Plan is to conserve the separate identities of settlements on the coastal plain. It seeks to protect the gap from inappropriate development as set out in the reasoned justification for Policy SP5 (paragraphs 2.48-56) and to designate the space as Local Green Space (paragraphs 2.57- 2.73). The Adopted Local Plan for Arun District has included a gap policy in relation to the small field to the west of the application site. The clear intention of both Authorities is to maintain the gap and maintain the separate identities of the two settlements.

The proposed development also encroaches on the setting to the National Park and would have an adverse effect on Highdown Hill and the landscape setting to the adjacent Downland landscapes of the National Park, the Highdown Conservation Area and the Scheduled Monument. The photomontages provided within the LVIA, submitted in support of the application, illustrate the extent on development from the A259 and the National Park but the LVIA assessment of effects underestimates the adverse effects of the scheme.

The Viewshed Study 2015 includes the Highdown Hill location as one of the key visual receptors in the Park, Viewpoint 31. Highdown Hill (National Trust) is identified as a

good vantage point from which to view the landscape and views from the Hill are assessed by the study as representative of sea views from the National Park. Whilst the view of the sea may be the main focus of such a view, the fore- and mid- ground landscape are essential parts of that view. Threats to the views from the High Downs looking out to sea, identified in the study, include *“intrusive new development within the view by day and by night that affect the sense of tranquillity within the National Park”* (para 3.22 of the Viewshed report 2015). The proposed development is located centrally in key viewpoint 31 as illustrated in the Viewshed Report, and the scale and extent of the development would be highly intrusive. The proposal’s effects on that view and on the setting to the National Park would be substantial and are underestimated in the LVIA accompanying the application.

Locally, the expansive views towards the National Park afforded by the existing footpath network would be reduced to glimpses of the Downs. Views from new routes proposed would not compensate for this adverse impact, as they would be substantially closer to the busy A259 road corridor and would include a more limited agricultural setting to the National Park. The visual amenity of the footpath network would be diminished by the proposals.

**Conclusion:**

Substantial adverse landscape and visual effects would arise from the development: such impacts would affect the local area and the wider landscape, including the landscape setting to the National Park, Highdown Hill scheduled Monument and the conservation area and the sea views from the National Park. The development would substantially close the gap between Goring by Sea and Ferring adversely affecting the separate identities of the settlements.