

November 2021

Land North West of Goring Railway  
Station, Goring-by-the Sea,  
Worthing, West Sussex

## Proof of Evidence

Of:

**Clive Self Dip LA CMLI MA  
(Urban Des)**

in respect of:

**Landscape Matters**

LPA Ref: AWDM/1264/20

PINS Ref: APP/M3835/W/21/3281813

on behalf of:

Persimmon Homes  
Report No: CSA/2304/09



Report Reference	Revision	Date	Prepared by	Approved by	Comments
2304-09	b	15.11.2021	CS	CA	
2304-09	c	01.12.2021	CS	SG	
2304-09	d	03.12.2021	CS	SG	
2304-09	e	15.12.2021	CS	SG	
2304-09	f	18.12.2021	CS	SG	Final



Certificate Number 6523  
ISO 9001



## CONTENTS

Page

---

<b>1.0</b>	<b>Summary and Conclusion</b>	<b>1</b>
<b>2.0</b>	<b>Qualifications and Experience</b>	<b>5</b>
<b>3.0</b>	<b>Background and Methodology</b>	<b>6</b>
<b>4.0</b>	<b>Site Context and Description</b>	<b>7</b>
<b>5.0</b>	<b>Summary of Landscape and Visual Effects</b>	<b>13</b>
<b>6.0</b>	<b>Assessment of the Appeal Scheme against Reason for Refusal 1 and Response to Third Party Comments</b>	<b>17</b>

### **Appendices** (in a separate report: (CSA/2304/10))

Appendix A:	Site Location Plan
Appendix B:	Aerial Photograph
Appendix C:	Photosheets
Appendix D:	Landscape Strategy
Appendix E:	Extract from Landscape and Ecology Study of Greenfield Sites November 2015
Appendix F:	Extract from South Downs National Park: View Characterisation and Analysis – November 2015
Appendix G:	Extract from Landscape and Ecology Study of Greenfield Sites Combined Summary April 2017
Appendix H:	Summary of Landscape and Visual Effects
Appendix I:	Photomontages
Appendix J:	Aerial Photograph showing local context

## 1.0 SUMMARY AND CONCLUSION

- 1.1 This evidence is submitted on behalf of Persimmon Homes, in respect of an appeal against the refusal of an outline planning application for a mixed-use development of 475 dwellings, a local centre, and associated infrastructure, on land immediately to the north west of Goring-By-Sea railway station ('the Site).
- 1.2 I have been involved with the Site for many years, as a consultant for Persimmon Homes, and its landscape character and setting has been pivotal in informing the scale and structure of the Appeal Scheme. The resultant layout, therefore, responds to the setting and context in an appropriate manner, it is shaped to not only deliver (much needed) housing, but it also provides landscape, recreational and ecological benefits.
- 1.3 Whilst the Council objected to the scheme on a number of landscape grounds, their own assessment of the Site recognises that the southwest corner has development potential. On the basis of that assessment, it would appear that the key landscape issue between the parties is the extent of development on the Site, rather than the principle of development.
- 1.4 The Site occupies an undistinguished arable field, which forms part of a larger parcel of farmland, which is surrounded on three sides by existing development, principally modern housing. The land is also crossed by visually intrusive high voltage overhead power lines, which are supported on lattice pylons; and there is the south coast railway running along its southern boundary.
- 1.5 The northern boundary of the Site is formed by Ferring Rife. Beyond the rife is an irregular shaped parcel of farmland (owned by Persimmon), which provides separation from Littlehampton Road. Immediately to the north of Littlehampton Road is the southern edge of the South Downs National Park.
- 1.6 The Site, and the retained farmland to the north, does not carry any statutory or non-statutory designations for landscape character, or quality, or ecological value. Similarly, the land does not have any TPO trees on it, or any heritage designations.
- 1.7 In terms of the wider context, the Site lies within the densely populated coastal plain which is characterised by predominantly suburban housing from the post-war period. The urban fringe character of the coastal plain contrasts markedly with that of the rising ground of the South Downs National Park, which lies to the north and, is largely free of development.

- 1.8 The Appeal Scheme will inevitably give rise to some localised and more distant views, of the proposed development, but the nature of these impacts needs to be considered in the context of the existing views, which has predominantly suburban development in the middle distance and the sea in the far distance. There are also some areas of farmland, commercial development, infrastructure and high voltage overhead power lines. Hence, in the majority of near-distance views, neighbouring development is already apparent and the proposed development will be of a similar scale, albeit with far more generous areas of landscaping to ensure that the new housing is better assimilated into the local area. Benefits will also arise from the undergrounding of the overhead power cables.
- 1.9 In more distant views from vantage points such as those on Highdown Hill, the Site lies within the middle distance of the view and forms part of a rectangular area of open land which lies within the low lying, settled coastal plain. Whilst development on the Site will be visible in views from Highdown Hill, as shown on the accompanying photomontage, it will clearly relate well to the existing pattern of development within the coastal plain and can be delivered in a manner which respects the special qualities of seaward views from the National Park. It will not block any views to the sea.
- 1.10 In respect of the impact of the proposed development on the setting of the South Downs, the National Park Authority do not object to the application, rather, they identified a number of matters that should be taken into consideration in its design and layout. Several of the matters raised can be addressed at the detailed design stage, whereas those that relate to the nature and structure of the proposed development have already been taken into account in shaping the masterplan and accompanying landscape strategy.
- 1.11 Paragraph 176 of the NPPF addresses the impact of development within the setting of National Parks and states that it should be sensitively located and designed to avoid or minimise adverse impacts. As I have explained in this evidence, the Appeal Scheme has been crafted to sensitively respond to the Site and its wider setting and minimises its impact on the National Park. As such it satisfies this objective of the NPPF.
- 1.12 In terms of direct landscape effects, the Appeal Scheme will result in the loss of an undistinguished, area of farmland, which would be replaced by new homes and substantial areas of open space. The land to the north of the rife will be retained in active agricultural use. The existing public footpaths, which border the Site, will be retained.

- 1.13 In the adopted Worthing Core Strategy the Site lies outside the delineated settlement boundary, but is not covered by any other landscape or spatial planning policies.
- 1.14 The proposed development is located to the south of Ferring Rife, set back behind an area of semi-natural open space and the farmland which follows the southern edge of the A259. By adopting such an approach, the setting of the South Downs will be respected and an indentation in the existing settlement boundary will be maintained.
- 1.15 Draft Policy SS5 identifies the Site and neighbouring land as part of a Local Green Gap which it is alleged serves to prevent coalescence between Goring and Ferring.
- 1.16 It is readily apparent from visiting the Site and by reviewing aerial photographs and mapping, that the settlements have already coalesced. The fact that the settlements have coalesced is also acknowledged in HDA's assessment of Greenfield Sites of November 2015. That assessment notes at para 5.77 that:
- 'Prior to the 20th century, Goring-by-Sea and Ferring were small nucleated settlements some distance from the site. During the 1950s, Goring Way was lined with houses, establishing a linear link of settlement between Goring-by-Sea and Ferring, about 200m to the south of the site (my underlining).*
- 1.17 The Site and neighbouring farmland is therefore better and more properly described as an indentation in the settlement boundary, given that the settlements have already coalesced. That indentation will be maintained, albeit reduced in scale, if the Appeal Scheme comes forward, as the land to the north of Ferring Rife will be retained in active agricultural use.
- 1.18 For motorists and cyclists on Littlehampton Road they will still experience an area of open farmland to the immediate south of the road, with housing set back behind Ferring Rife. As the proposed planting alongside the rife matures, the new housing will be largely screened from view.
- 1.19 Draft Local Green Space Policy SS6 is a significant designation which conveys the highest level of protection, akin to Green Belt. In the main body of this evidence I have assessed the Site against the criteria in the NPPF for designating Local Green Spaces and concluded that there is no justification for such a designation. It should also be noted that the LPA, in their Statement of Case, acknowledge that the Site is not a Valued Landscape. This is highly relevant, as the criteria for identifying Valued Landscapes is similar to that of Local Green Spaces.

- 1.20 Whilst policies SS5 and SS6 virtually preclude any form of development, HDA's own assessment of the Site recognises that some development can take place to the southwest of Ferring Rife. However, the parcel of land they have identified does not relate to any defensible or identifiable boundaries and as such would be an arbitrary development parcel which would be difficult to access. I believe that the Appeal Scheme provides a far more logical, cohesive and sustainable approach to development on the Site than the arbitrary and ill-defined parcel identified by HDA.
- 1.21 In conclusion, I accept that the Appeal Scheme will give rise to a certain level of landscape harm, as a greenfield site will be released for development. The Appeal Scheme has however been carefully crafted to respond to both its landscape and townscape setting in a sensitive manner; that includes the decision to retain the land north of Ferring Rife in active agricultural use. Whilst there will be some views of the proposed development from the National Park, it will not introduce a form of development that is at odds with the prevailing character of the coastal plain and, as such, will not materially impact on its setting.

## **2.0 QUALIFICATIONS AND EXPERIENCE**

- 2.1 I am Clive Self and I am a Chartered Landscape Architect and an Urban Designer. I hold a Diploma in Landscape Architecture and a Master's Degree in Urban Design. I have over 30 years' experience in landscape and townscape design and assessment.
- 2.2 I am the Managing Director of CSA, a multi-disciplinary environmental planning practice which I established in 1999. The practice acts for the public and private sector and has an in-house team of urban designers, ecologists, heritage consultants and landscape architects. We operate throughout the country.
- 2.3 Prior to forming CSA I was responsible for landscape architecture and masterplanning at PRC Fewster Architects and before that I was employed in a similar role at Sargent and Potiriadis Architects. I have worked throughout the UK, Middle East and the United States on a broad range of landscape projects, townscape appraisals and environmental planning work.
- 2.4 I have been involved in a number of projects within the area, most notably a mixed use scheme of 940 dwellings at West Durrington, where we undertook the masterplanning, landscape assessment and landscape design of the scheme. That site borders the South Downs National Park on 2 of its 4 boundaries; it also adjoins a Conservation Area and several listed buildings. The scheme which has now largely been built out, exemplifies the constrained nature of the district.
- 2.5 My company is currently involved in projects that range from the masterplanning of new garden villages to redevelopment of inner city brownfield sites. We work throughout the UK, in both the rural and urban environment and act for both the public and private sector.
- 2.6 I have given landscape and urban design advice on numerous schemes. I have also given landscape and urban design evidence at Local Plan/LDF Inquiries, Section 77 and 78 Inquiries, and CPO Inquiries.
- 2.7 The evidence that I have prepared and provide for this appeal is true and has been prepared and is given in accordance with the guidance of my professional institute and I confirm that the opinions expressed are my true and professional opinions.



## **3.0 BACKGROUND AND METHODOLOGY**

### **Background**

- 3.1 Persimmon Homes own the Site and also the land immediately to the north of Ferring Rife, and south of Littlehampton Road, which lies outside of the redline boundary.
- 3.2 I have advised on the development potential of the entire landholding, both from a landscape and urban design perspective, from 2014. From the outset, my advice has been that development should be confined to the land south of Ferring Rife so that the setting of the South Downs National Park is respected and an indentation in the settlement boundary continues to be experienced. That advice has always been followed, with a carefully considered scheme brought forward, which responds sensitively to the Site and its wider setting.
- 3.3 My evidence should be read alongside the submitted Landscape and Visual Impact Assessment ('LVIA'; doc ref: CSA/2304/08, July 2020). As that document provides a comprehensive assessment of the anticipated landscape and visual effects of the Appeal Scheme, I do not replicate it here, rather I summarise the most pertinent points. In addition, I have considered the submitted Design and Access Statement ('DAS'), as well as the relevant plans and other submitted documents. I shall draw upon that information as part of this evidence.
- 3.4 My evidence will consider landscape and visual matters, while Mr Hutchison deals with planning policy and considers the overall planning balance.

### **Methodology**

- 3.5 During consideration of the planning application, CSA engaged with Hankinson Duckett, the Council's landscape consultants, on the scope of the LVIA and key viewpoints. Whilst we did not necessarily agree on the nature of the predicted impacts, there was agreement that the LVIA was comprehensive and fit for purpose and that the southwestern part of the Site was capable of accommodating a limited amount of development.

## **4.0 SITE CONTEXT AND DESCRIPTION**

### **Site Context**

- 4.1 The Site is an irregularly shaped parcel of land which is indented into the urban area of Goring and Ferring. It is bordered on three sides by built development, including the coastal railway line to the immediate south. A short distance to the north, beyond the intervening arable field, is Littlehampton Road (A259), a busy trunk road. The location of the Site and its immediate context is illustrated on the Site Location Plan and Aerial Photograph in Appendices A and B.
- 4.2 Beyond Littlehampton Road, which forms the southern boundary of the South Downs National Park, the land rises gradually to Highdown Hill. Within the South Downs National Park are Highdown Football Pitches. The well vegetated grounds at Highdown Garden, a Registered Park and Garden and Conservation Area, occupy the rising ground to the north of the playing fields. Beyond this, the landform continues to rise to the summit of the hill, from which extensive views are available over the largely developed coastal plain towards the sea.
- 4.3 Neighbouring development which borders the Site is mainly from the post-war period and comprises a mix of bungalows, 2 storey houses and 3 and 4 storey flatted development.

### **Site Description**

- 4.4 The Site is an undistinguished, featureless field of arable farmland, that is crossed by unattractive high voltage overhead electricity cables and lattice pylons.
- 4.5 There are no landscape features of note within the body of the Site. An intermittent field hedgerow separates the Site from a small field to the south west. The remainder of the western boundary is bordered by the rear gardens of the dwellings on Ferring Lane.

### **Public Rights of Way**

- 4.6 Unmade Footpath 2121 leads from Goring-by-Sea station and extends alongside the southern Site boundary to Ferring. A second path, Footpath 2121\_1, extends north-south alongside the south western Site boundary, leading from Ferring Lane to meet the footpath alongside the southern boundary. Further afield, there are a number of footpaths which cross the higher ground around Highdown Hill at the edge of the South Downs.

## Topography

- 4.7 The Site lies within the coastal plain, which sits at approximately 5m Above Ordnance Datum ('AOD'). Immediately north of Littlehampton Road, the land rises to the summit of Highdown Hill, which is located approximately 1km north of the Site, at an elevation of approximately 81m AOD, with extensive views available over the developed coastal plain to the English Channel. Beyond this, extending away from the coastal plain, the landscape of the South Downs has a distinctly undulating downland character with frequent tracts of woodland.

## County Landscape Character

- 4.8 In assessing the impact of any development, it is of the utmost importance to understand its context, and I now briefly refer to the assessments of the area that have been carried out.
- 4.9 The Landscape Character Assessment of West Sussex (2003) which was prepared by the County Council identified the Site as falling within the South Coast Plain Regional Character Area ('RCA'). This regional character area is subdivided into 12 smaller Landscape Character Areas ('LCA'). The key characteristics of parcels SC11 and 13 that are most relevant to the setting of the Site are:
- *'Low lying flat open landscape;*
  - *Dominant urban fringe with major conurbations of Littlehampton and Worthing. Settlement edges often sharply contrast with adjacent open countryside;*
  - *Frequent urban fringe influences of horse paddocks, light industry, airport, and recreational open space;*
  - *Narrow gaps of open land at Kingston, Ferring, Sompting, and Lancing provide views to the sea and separation between the urban areas;*
  - *Medium scale arable farming and market gardening, with clusters of greenhouses;*
  - *Meandering rifes and straight drainage ditches;*
  - *A low density of native hedgerows and hedgerow trees, interspersed with shelterbelts, single species hedges or individual standards planted using tall trees such as Poplar, Monterey Pine and Tulip trees;*
  - *Clusters of windblown trees;*

- Long views to the South Downs;
- Busy minor and major roads;
- Industry in the countryside; and
- South Coast railway line links the areas.'

4.10 The document also identifies key landscape and visual sensitivities which affect the LCA, as follows:

- 'Urban development pressures, especially in the gaps between settlements;
- Closing of open views between settlements;
- Major existing road improvements and the possibility of new ones;
- Loss of tree and hedgerow cover due to wind, salt desiccation and drought; and
- Planting of hedge and tree boundaries with unsympathetic exotic species.'

#### **South Downs National Park: View Characterisation and Analysis (2015)**

4.11 The South Downs National Park Authority commissioned LUC to undertake an analysis and mapping exercise of views to, from, and within the National Park. That study is intended to provide a foundation for evidence on view types within the Park and its setting to support development management.

4.12 The study identifies a selection of views which represent the various types of view found across the Park. Representative view 31 (See Appendix F) illustrates the view available from Highdown Hill, which is the viewpoint most relevant to the Site. The reason for the selection of this view is stated as:

*'The site of a hillfort, Highdown Hill is owned by the National Trust and a good vantage point from which to view the landscape. Views to the east and south include the densely populated coastal towns of Worthing, Ferring and East Preston, which reduces the remote qualities associated with other elevated viewpoints within the park. Extensive sea views are however the main focus and therefore this view is representative of sea views from the National Park' (my underlining).*

4.13 The study groups the identified views into view types for further analysis. Representative view 31 is grouped with other view points on the high downs

looking south out to sea. The analysis identifies the special qualities of these views as follows:

*'The elevated position of these viewpoints on the Downs above the coastal plain means this view type represents the 'breathtaking views' that are noted in the first of the Park's special qualities. It also reveals a rich variety of wildlife and habitats including some of the iconic habitats of the South Downs such as the downland and yew woodland (at Kingley Vale), the tranquillity of the Downs compared to the settled coastal plain, the way that farming has shaped the landscape in the form of distinctive field patterns, and the rich cultural heritage as a result of heritage assets in the view.'*

4.14 Threats to the view as identified in the report include intrusive new development within the view that affect the sense of tranquillity within the National Park. However, it notes that many of these views are across the developed coast and that development forms an existing part of these views.

4.15 The study provides guidance on the aims and management of these views. It states that the aim is to ensure that opportunities to access and appreciate these panoramic views are maintained, and their special qualities retained. In particular it notes the following qualities of relevance to this assessment:

- *'Maintain the undeveloped character of the downs within the National Park which contrasts with the developed coastal plain, and ensure that development outside the National Park does not block, or adversely affect the quality of, views towards the sea.'*

- *'Ensure that any built development outside the park is integrated into its context in terms of scale, form and materials – consider using native vegetation to enhance existing views that contain development, and minimise visibility of new development from the Park.'*

4.16 The common theme of the assessments referred to above, is that the coastal plain is heavily settled and as such contrasts with the largely undeveloped nature of the South Downs, from where there are elevated views to the sea as well as of the coastal plain, which is frequently described as urban fringe.

### **Visibility**

4.17 An assessment of the visibility of the Site was undertaken and a series of photographs taken from public vantage points, rights of way and public highways. The viewpoints are illustrated on the Site Location Plan and Aerial Photograph contained in Appendices A and B and on the photographs in Appendix C. A description of the key views of the Site is contained within the

tables in Appendix H. The photographs were taken in the summer of 2020 but as there has been no material change to the Site or neighbouring area it has not been felt necessary to update them.

- 4.18 As the reason for refusal is predominantly concerned with longer distance views, to and from, the Site and the setting of the National Park, I have only briefly described the extent of views. A fuller description is contained in the LVIA.

#### **Near Distance Views**

- 4.19 The main near distance views are from the neighbouring roads, the public footpaths which cross the Site, passengers on the railway and elevated views from the neighbouring flats.

#### **Middle and Long Distance Views**

- 4.20 There are some views of the Site from Highdown Rise, which lies within Highdown Registered Park and Garden and Conservation Area, and leads to the public carpark adjacent to Highdown Gardens (Photograph 20). Views from the remainder of Highdown Conservation Area and the Registered Park and Gardens are limited by the density of vegetation within the grounds of the gardens. Views from the public carpark which serve the gardens are generally limited by intervening vegetation, although there are views towards the Site, where breaks occur (Photograph 19).

- 4.21 There are panoramic views south across the coastal plain from the higher ground at Highdown Hill (Photograph 21). In views towards the coast from these elevated vantage points, the broad expanse of coastal development is evident, with the Site visible in the middle ground, beyond Littlehampton Road. Due to the elevation of these viewpoints, the English Channel is visible beyond the built up area. As noted in the South Downs National Park: View Characterisation and Analysis (2015), these sea views are the main focus of views south and east from the edge of the National Park.

- 4.22 As set out in the LVIA, there are also some other opportunities to view the Site and coastal plain from elsewhere in the National Park.

#### **Landscape Quality, Value and Sensitivity**

- 4.23 The Site does not carry any statutory or non-statutory designations for landscape character or quality. It comprises a large arable field which lies outside of the National Park and has a number of detracting features. Accordingly, it is assessed as being at the lower end of medium landscape quality. The parties agree that it is not a Valued Landscape.

4.24 Landscape sensitivity is judged according to the type and scale of development proposed, and the ability of the landscape as a resource to accommodate the development. Taking account of the Site's local setting, and that of the National Park, the Site is assessed as being of medium landscape sensitivity.

## **5.0 SUMMARY OF LANDSCAPE AND VISUAL EFFECTS**

- 5.1 The following section summarises the ability of the Site to accommodate the proposed development and potential impacts on the character of the landscape and visual amenity.

### **Relationship to Settlement and Local Area**

- 5.2 The Site is closely related to existing development and has good access to local facilities, including Goring-by-Sea railway station. It also has the benefit of being in close proximity to Highdown Playing Fields and the recreational resource of the National Park.
- 5.3 The proposed development will extend up to Ferring Rife, but will not be any closer to the National Park than the existing housing on Goring Street, immediately to the east of the Site, or that of Northbrook College to the north of Littlehampton Road.

### **Landscape Features**

- 5.4 There are no landscape features within the Site which present a constraint to development, save for Ferring Rife which is being respected in an appropriate manner. The Landscape Strategy also shows that there are opportunities to enhance the landscape and ecological value of the open spaces within the proposed development.

### **Public Rights of Way**

- 5.5 The existing public footpaths within the Site are to be retained and a series of recreational footpaths provided within the areas of open space and alongside Ferring Rife. This will significantly increase public access to the Site and provide new walking routes alongside the watercourse and within areas of landscaped open space. The proposals will benefit residents of the new development, as well as existing local residents.

### **Visibility**

- 5.6 The visual appraisal in the LVIA identifies that there are some opportunities for views from adjoining dwellings, public rights of way and the railway. Middle and long distance views from the south, east and west are prevented by intervening development. There are also opportunities for views from the rising ground within the South Downs National Park to the north.
- 5.7 A number of illustrative Photomontages (see Appendix I) have been prepared from the viewpoints at Highdown Hill (Viewpoint 21), from Highdown Rise



leading to Highdown Gardens (Viewpoint 20), and from Littlehampton Road (Viewpoint 12). These illustrate the extent of the visibility and likely change to these views as a result of the proposed development. The photomontages are based on the parameters shown on the Concept Masterplan / Landscape Strategy, and described in the Design and Access Statement. Photomontages have been prepared at Year 1, when the proposed landscaping is undertaken, and at Year 15, when any landscape mitigation has established. An assumption has been made that new broadleaf planting will have grown on average 5m in 15 years. The following section makes reference to the photomontages where relevant.

### **Near Distance Views**

- 5.8 The photomontage from Viewpoint 12 shows the view from the western approach along Littlehampton Road. This shows how the proposed development will be assimilated into the landscape as the vegetation matures and that the rife will form a logical and defensible boundary.
- 5.9 The new housing will be located in closer proximity to Littlehampton Road than is the existing case, but it will be no closer than the existing housing which lies to the east of Goring Street. The visual effects will be offset in part by environmental improvements within the open space alongside Ferring Rife and by the undergrounding of the prominent HV pylons. The new landscaping will provide an attractive setting for the new homes, and will filter and soften views towards the new and existing settlement edge.

### **Middle and Long Distance Views**

- 5.10 The Site is visible in views from the higher ground at the edge of the National Park, predominately from vantage points on Highdown Hill. The photomontage from Viewpoint 21, illustrates the change to the existing view as a result of development. Photomontage 20 is taken from Highdown Rise, at a lower elevation than photomontage 21, and shows that the Appeal Scheme will not block sea views and that the land to the north of the rife continues to provide a swathe of undeveloped farmland.

### **Representative views from Highdown Hill**

- 5.11 The viewpoint at Highdown Hill is identified and described in the South Downs National Park: View Characterisation and Analysis study. That report identifies this view as representative of viewpoints on the high downs looking south out to sea. The hill fort at Highdown Hill is also identified as a landmark within the National Park. The study identifies the special qualities of these view types, and also provides guidance on the aims and management of these views. The following section considers the impact of the proposed development on the special qualities of the identified views to the sea.

- 5.12 As previously noted, the view characterisation study identifies that views from Highdown Hill include the densely populated coastal towns of Worthing and Ferring, which contrast with the remote qualities associated with other elevated view points in the National Park. It goes on to say that extensive sea views are the main focus of this view. In terms of special qualities, the study states that the view type represents 'breath-taking views' which, amongst other things, reveal the tranquillity of the South Downs compared to the settled coastal plain. Amongst the threats to the view, it notes intrusive new development that affects the sense of tranquillity within the National Park, although it acknowledges that development is an existing part of these views. Urban settlement is the key characteristic of the coastal plain and, as noted above, it is this quality which contrasts with the tranquil nature of the National Park. Photographs 2 and 21 clearly shows that this is an accurate description of the coastal plain.
- 5.13 New development, such as the Appeal Scheme, within the coastal plain will therefore be consistent with the established character of this area. Development which is carefully planned and sited in close proximity to existing built development on the coastal plain, and includes appropriate landscape mitigation, need not therefore result in 'intrusive' development.
- 5.14 The retention of the farmland to the north of the Site, combined with environmental improvements alongside Ferring Rife, the removal of the pylons, and the careful design and landscaping of the proposed edge of the Appeal Scheme, will allow the proposed development to be assimilated into the existing area. In addition, the proposed development maintains a buffer of farmland and semi-natural open space to the north, which provides an appropriate transition between the urban area and the lower slopes of Highdown Hill, albeit one that is truncated by the route of the A259 Littlehampton Road. The road is heavily used at all times of the day.

### **Highdown Conservation Area and Registered Park and Garden**

- 5.15 The Appeal Scheme will be visible from Highdown Rise, within Highdown Conservation Area and Registered Park and Garden. The photomontage from Viewpoint 20 illustrates the change in the view from the access drive. In views from the driveway, the proposed development would be seen in the middle ground and within the context of existing development. The farmland which lies to the north of Ferring Rife will be visible and will continue to provide an undeveloped area of farmland alongside Littlehampton Road. Landscaping within the open space in the northern part of the Site, and within the Green Corridors between the development parcels will soften views of the new homes, and provide an appropriate landscaped edge between the built up area and the adjacent farmland.

5.16 Views from within the grounds of the Registered Park and Garden are limited by the existing vegetation within the grounds. These views are mainly inward looking.

### **Landscape Character and Quality**

5.17 Development in the location proposed will be entirely consistent with the surrounding settlement pattern. Environmental improvements within the open space to the north and the adjacent farmland would also be consistent with the land management guidelines set out in the Landscape Character Assessment of West Sussex in the following ways:

- Opportunity to restore former field boundary structure strengthening the existing landscape framework to the north of the built part of the Site;
- New woodland, tree and shrub planting to filter views to the urban edge;
- Landscape and ecological enhancements to Ferring Rife; and
- Species-rich grassland creation.

5.18 The more significant landscape effects would be experienced within the Site and from within the farmland to the immediate north. However, this would be the case with any development of green-field land at the edge of a settlement.

### **Separation between Goring-by-Sea and Ferring and Local Green Space**

5.19 The Site is not covered by any form of 'gap' policy in the Core Strategy. In terms of the Site's alleged function in providing spatial separation, as set out in draft Policy SS5, I have addressed this in Section 6 of this evidence.

5.20 In respect of Local Green Space, the Site is similarly not identified as Local Green Space in the Core Strategy. Draft Policy SS6 is similarly addressed in Section 6 of this evidence.

## **6.0 ASSESSMENT OF THE APPEAL SCHEME AGAINST POLICIES CITED IN REASON FOR REFUSAL 1 AND RESPONSE TO THIRD PARTY COMMENTS**

- 6.1 I now address the policies cited in the first reason for refusal and then consider other matters that have been raised. Whilst there is inevitably an overlap between the visual effects and the setting of the Scheduled Monument of Highdown Hill, the assessment of significance on heritage assets is addressed in the evidence of Ms Stoten. It is also relevant to note that in the Council's SOC they acknowledge that the impact of the development on heritage assets is less than substantial.
- 6.2 Representations have been made to the emerging Local Plan, by the appellant, and I recently gave evidence, on policies SS5 and SS6, at the examination hearing session. The Inspector's initial advice on that hearing session has recently been published and I shall refer to that in the following section. The implications of the Inspector's advice is explained in detail in the evidence of David Hutchinson.

### **Draft Policy SS4 Countryside and Undeveloped Coast**

- 6.3 Draft Policy SS4 is similar to adopted Policy 13 which is concerned with the natural environment and landscape character. The adopted policy states that new development needs to be met within the built up area boundary and that residential development outside of the boundary will only be considered as part of a borough wide review if there is an under delivery of housing. It goes on to say that, amongst other things, new development will need to respect biodiversity and the natural environment.
- 6.4 The Site falls outside of the settlement boundary, in both the adopted and emerging Local Plan. Whilst I acknowledge that release of a green field site for development will inevitably result in a certain level of landscape harm, the Appeal Scheme has been carefully crafted to respond to both the immediate and wider environment, and setting aside the obvious benefits of delivering much needed housing, it also brings recreational and wildlife benefits.
- 6.5 It is also relevant to note that whilst the Council object to the scheme on a number of landscape grounds, their own assessment of the Site (see Appendix G) recognises that the southwest corner of the Site has development potential. On the basis of that assessment it would appear that the key landscape issue between the parties is the extent of development on the Site rather than the principle of development.

## **Draft Policy SS5 Local Green Gaps - b Chatsmore Farm**

6.6 Draft Policy SS5 identifies the Site as falling within one of four proposed gaps which supposedly exist between settlements. It states that development within these gaps will be carefully controlled and will only be permitted in exceptional circumstances and that it must be consistent with other policies in the Plan. It goes on to say that any development must ensure (individually or cumulatively):

- *it does not lead to the coalescence of settlements;*
- *it is unobtrusive and does not detract from the openness of the area;*
- *it conserves and enhances the benefits and services derived from the area's Natural Capital*
- *it conserves and enhances the area as part of a cohesive green infrastructure network.*

6.7 Draft Policy SS5 does not preclude development, but states that it will only be permitted in exceptional circumstances. Whilst I do not consider that the draft gap policy is justifiable, I have nevertheless considered the Appeal Scheme against the four objectives set out above.

### ***It does not lead to coalescence of the settlements***

6.8 The Appeal Scheme will not result in the coalescence of Goring with Ferring because the two settlements have already coalesced. The Site and land immediately to the north of Ferring Rife, which also falls within the proposed gap, does not create a 'gap' between the two settlements. Rather, it is an indentation in the boundary of the coalesced settlements.

6.9 It is readily apparent from looking at the Aerial Photograph in Appendix J that the two settlements have coalesced. Furthermore, whilst HDA have defended the gap policy, their own evidence (HDA Goring Gap Proposed Local Green Space Designations, June 2018) recognises that the settlements have already coalesced. Paragraph 3.2.5 of that document deals with settlement pattern and gap function and states that:

*'Prior to the 20th century, Goring-by-Sea and Ferring were small nucleated settlements some distance from the site. During the 1950s, Goring Way was lined with houses, establishing a linear link of settlement between Goring-by-Sea and Ferring, about 200m to the south of the site (my underlining). During the 1960s, much of the current housing to the east and west was in place, with housing in Ferring reaching level with the northern edge of the northern gap, and*

*housing reaching north from Goring Way to the railway along the southern edge of the gap. The full extent of housing which borders the site to the east was reached during the 1980s, and multi-storey buildings have recently been constructed to the south-east of the northern gap on the opposite side of the railway. However, an open area remains adjacent to the south, beyond the railway as school playing fields."*

- 6.10 On the basis of the above description, it would appear that, notwithstanding the fact that HDA acknowledge that Goring and Ferring have coalesced, that they attach weight to the fact that the school playing field provides an open area. Whilst this is factually correct, the playing field falls with the curtilage of the school and the settlement boundary. It is also relevant to note that the playing fields do not form part of a swathe of open land that separate the two settlements as there is a substantive area of suburban development to the south of the playing fields which further binds the two settlements together.

***It is unobtrusive and does not detract from the openness of the area***

- 6.11 As with the neighbouring development, housing on the Site will be visible in a number of views. The scale of the proposed development is nevertheless compatible with the neighbouring housing, but unlike the neighbouring flatted developments, it has generous areas of landscaping which will provide containment and, over time, screen many of the lower lying views.
- 6.12 The Site itself will obviously change from that of open arable farmland to a predominantly residential development, but generous areas of open space have been incorporated into the scheme and the land to the north of the rife will remain open and will continue to be in active agricultural use. Hence, an indentation in the settlement boundary will continue to be experienced and conserved, albeit reduced in scale.

***It conserves and enhances the benefits and services derived from the area's natural capital***

- 6.13 As gap policies are typically spatial planning tools this is an unusual requirement and overlaps with other draft policies. Nevertheless, the Appeal Scheme has been crafted so that it respects and enhances the natural capital on site and will deliver a minimum of 10% BNG. It is also worth noting that the Council's ecologist does not object to the Appeal Scheme.

***It conserves and enhances the area as part of a cohesive green infrastructure network***

- 6.14 The key element of green infrastructure on the Site is the rife and this is to be retained in a generous green corridor. Given that the land adjoining the rife is

currently actively farmed, the proposed green corridor provides a good opportunity to both preserve and enhance the landscape and wildlife value to the rife in this location.

### **Inspector's Initial Advice on SS5**

- 6.15 The Inspector's Initial Advice on the recent hearing session indicated that draft Policy SS5 should be reviewed and that modifications are necessary to the criteria for designating such areas.
- 6.16 In respect of the Chatsmore Farm Gap, the Inspector noted that it represented a gap in the 'built form' as opposed to saying that it provided separation between settlements as such. He went on to say that it was well related to the National Park and as such allowed the countryside to penetrate the built-up area.
- 6.17 The Inspector also referred to the Goring–Ferring Gap and stated that the character of that area was more varied than that at Chatsmore Farm with some areas of formal recreation and woodland. He went on to say that the area is also a designated wildlife site. He concluded that these factors added to the local significance of the Goring–Ferring Gap.
- 6.18 From my observation of the Goring-Ferring Gap and the Chatsmore Farm Gap, I agree with the Inspector that their qualities are very different and as such, if development were to be proposed in either of these gaps then it must be reviewed against the specific characteristics of each area, rather than simply accepting that the draft policy precludes all forms of development. By adopting such an approach, it would be compatible with the findings of HDA, who acknowledge that development could occur in the southwestern part of the Chatsmore Farm Gap. It is also worth adding that I have achieved planning consents for residential developments, both through negotiation and at appeal, for sites that fell within locally designated gaps.

### **Draft Policy SS6 Local Green Space**

- 6.19 Representations have been made to the emerging Local Plan which, in short, say that there is no justification for the Council's proposal to designate the land at Chatsmore Farm as Local Green Space.
- 6.20 Worthing acknowledges that the draft Local Plan delivers a significant shortfall in the identified housing needs yet appear to be seeking to use draft policies such as SS6 as a mechanism to constrain further growth. This approach is contrary to the guidance in the NPPG (para 015 Ref 37-015-201403060) which says that...

*“...blanket designations of open countryside adjacent to settlements will not be appropriate. In particular, designations 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’. (My emphasis)*

6.21 Paragraph 102 of the NPPF identifies the criteria against which Local Green Spaces should be assessed. These criteria are considered in more detail below under the relevant heading. Where applicable reference is made to the Council's own evidence base.

#### **In Reasonably Close Proximity to the Community it serves**

6.22 There is no specific standard for what constitutes reasonably close proximity. In this case, I accept that the Site is located in close proximity to the adjoining residential area. It is not however publicly accessible, save for the two public footpaths which cross it. These two footpaths have statutory protection in any event and clearly do not elevate the Site's status to that of a Local Green Space.

#### **Demonstrably Special to a Local Community**

6.23 I now briefly consider the attributes of the Site against subsection b of paragraph 102 of the NPPF, which identifies matters which are cited as examples of an area being demonstrably special to a local community.

6.24 **Scenic beauty** - In terms of scenic beauty, the Site has no local or national designation for landscape quality. It lies close to, but outside of, the South Downs National Park. In terms of landscape quality, it is open farmland which is devoid of any notable landscape features, save for Ferring Rife. It also has a number of detracting features, such as the neighbouring flatted developments, overhead powerlines and lattice pylons, heavy traffic on Littlehampton Road and the South Coast Railway. It therefore cannot reasonably be described as being of high landscape quality or being scenically beautiful.

6.25 **Historic significance** - In terms of the Site's historic significance, it contains no heritage assets nor is it designated as a Conservation Area. The neighbouring development is predominantly from the post war period and of no particular architectural merit. The field pattern is relatively ordinary and there are no notable historic features, such as ridge and furrow.

6.26 There is some inter-visibility between the Site and Highdown Hill and Highdown Gardens. In views from these historic assets, the Site occupies the foreground to urban development which extends along the coast and adjoins the Site on three of its four boundaries. These elements, along with the lattice pylons which occupy the Site are a component of its setting and further dilute its



historic association with the wider landscape. In views towards Highdown Hill, the heavily trafficked Littlehampton Road occupies the middle ground, which similarly dilutes the relationship between the Site and Highdown Hill,

- 6.27 It is also relevant to note that the Council's archaeologist does not object to the Appeal Scheme. Given these factors I do not consider the Site to be of any particular historic significance. This is a matter which is considered in greater detail in the evidence of Ms Stoten.
- 6.28 **Recreational value** - The Site is in private ownership and is not publicly accessible, save for the public footpath which follows the railway line to the south, and a section of public footpath which crosses the south west corner. Given that the footpaths provide a connection to Goring Station, the South Downs National Park and the school and local facilities on Goring Way, one would expect them to be used by local residents. On any objective basis the Site is otherwise of limited recreational value.
- 6.29 The Council's appraisal notes that the recreational value of the Site is particularly important given the deficit of natural / semi-natural green space and amenity space in the borough. This is a curious conclusion to reach when the South Down National Park is on the doorstep, as are the Highdown football pitches and Highdown Gardens. The coast is also on the doorstep. It is also relevant to note that the Appeal Scheme provides a significant area of public open space which will be accessible to both new and existing residents alike. The existing public footpaths will be retained, although I accept their setting will change.
- 6.30 **Tranquillity** – I am not aware of any formal criteria for assessing tranquillity but the most commonly recognised detracting elements are noise and visual intrusion. In respect of the former, the Site is washed over by the noise of traffic using Littlehampton Road and to a lesser extent by trains using the neighbouring railway line, and the vehicles using Goring Street. In respect of the latter, the neighbouring residential development is readily visible from within the Site, most notably the flatted development to the east of Goring Street and the recently constructed flats to the south of Goring Station. Given these factors, the Site cannot be considered tranquil on any reasonable basis.
- 6.31 **Richness of Wildlife** - The Site does not carry any statutory or non-statutory ecological designations. It comprises predominantly arable farmland which is of limited wildlife value, although it is acknowledged that Ferring Rife has wildlife interest. The Landscape and Ecology Study undertaken by HDA confirms, under ecological sensitivity, that the majority of the Site is of negligible conservation interest. It is also relevant to note that the Council's ecologist does not object to the Appeal Scheme, subject to securing ecological mitigation and enhancement measures and that the Council's

SOC acknowledges that reason for refusal 5, which is concerned with ground nesting birds, can be overcome through a S106 agreement.

- 6.32 The Council's Local Green Space appraisal, also undertaken by HDA, states that the significance of the Site's wildlife richness to the local community is highlighted by the 113 responses to the issues and options consultation. Whilst this may identify that some local people identify that the Site has wildlife value, it is not a robust or objective justification to suggest that it performs this function to any notable degree and that it should be designated as Local Green Space for this reason.
- 6.33 Given the findings of the Ecological Assessment that accompanied the application, the fact that the site is to be retained in a green corridor and that HDA identified the Site as being of negligible conservation interest, and that the Council's ecologist does not object to the Appeal Scheme, then I can see no justification for elevating the status of the Site to a valuable wildlife site.

#### **Local in Character and not an Extensive Tract of Land**

- 6.34 The NPPF does not indicate what constitutes an extensive tract of land. The PPG states that Local Green Space designation should not be used to provide a blanket designation over countryside adjacent to settlements, and should not be used to achieve a new area of Green Belt by another name.
- 6.35 The Site is approximately 20 ha which clearly constitutes an extensive tract of land. It is on the urban fringe and its character is affected by neighbouring development.
- 6.36 My assessment of the Local Green Space designation is that it fails to meet the vast majority of the qualifying criteria set out in the NPPF and as such is not justifiable.
- 6.37 It is also relevant to note that draft Policy SS5 is akin to a Green Belt policy in that it says, at para d ii, that development will only be permitted '*if it is unobtrusive and does not detract from the openness of the area*'. As openness is a physical attribute it would appear that the policy therefore precludes virtually all forms of development. However, in their 2017 Combined Summary of Greenfield Sites (See Appendix G), HDA acknowledged at paragraph 2.4 that '*...Sites .. 5B [the southwest part of the Appeal Site] are also judged to have Medium suitability for housing development. These sites are potentially suitable in landscape, visual and ecology terms for limited development proposals....*'. Once again, this shows the inherent contradiction between the Council's own evidence base and the objectives of the draft policy.
- 6.38 I have set out above why I consider that the draft Local Green Space Policy is not merited. It is also relevant to note that in the Council's Statement of Case

they acknowledge that the Appeal Site is not a 'Valued Landscape' in NPPF terms' (See para 8.13 SOC).

6.39 Box 5.1 of the 3rd edition of the Guidelines for Landscape and Visual Impact Assessment 3 (GLIVA) sets out seven factors that can help in the identification of Valued Landscapes. These are:

- Landscape quality (condition)
- Scenic quality
- Rarity
- Representativeness
- Conservation Interest
- Recreation value
- Perceptual aspects
- Association

6.40 It is highly relevant to note that the Council rely on the majority of the factors set out in Box 5.1 of GLVIA, for trying to designate the Site as a Local Green Space, yet in the SOC they acknowledge that the Site is not a Valued Landscape. This rather underlines the perception that the proposed Local Green Space designation is really just an anti-development policy rather than one which is proposed to be designated on merit.

#### **Inspector's initial Advice on SS6**

6.41 I have already provided my own assessment of Draft Policy SS6 and concluded that the Local Green Space designation is not appropriate for the Chatsmore Farm site. The Inspector reached a similar conclusion.

#### **Other Considerations**

6.42 In the preceding section I have summarised the anticipated effects of the Appeal Scheme and therefore will only briefly comment on the additional matters identified in the reason for refusal.

#### **Landscape and Visual effects on the Wider Area**

6.43 Given the low-lying nature of the coastal plain and the elevated nature of the South Downs National Park there are currently numerous opportunities to view development in the coastal plain from the South Downs.

- 6.44 In Section 4, I have referred to the various character assessments and noted that the main theme is that the coastal plain is heavily urbanised and that sea views are the main focus of the elevated views from the National Park. Threats to the elevated views are identified as forms of development that would be intrusive and affect the sense of tranquillity within the National Park. For the reasons I have already set out, the Appeal Scheme will not be out of character with the neighbouring area and will not block sea views.
- 6.45 It is also relevant to note that, in their consultation response to the planning application on the 21<sup>st</sup> October 2020, the National Park Authority did not formally object to the application as such. Their response quite rightly recognised that the Appeal Scheme has the potential to detrimentally impact on the setting of the National Park, but they then went on to say that:
- 'the SDNPA makes no comment on the principle of development, however would recommend that consideration be given to the design of the development. The development should be designed to minimise its visual presence and impact, and where impacts are identified these should be mitigated or minimised through appropriate design interventions. The ultimate design of the proposals should be appropriate to its sensitive, edge of settlement location in terms of the developments height, scale and density. Consideration should also be given to the impact of the development upon the Highdown Conservation Area'.*
- 6.46 The consultation response also referred to the fact that a Conservation Area Appraisal should be considered as part of the determination of the application. Reference was also made for the need to make reference to the View Characterisation Study, which I have already referred to and which was contained in the LVIA.
- 6.47 The consultation response also referred to the status of the National Park as a designated International Dark Sky Reserve and went on to say that the SDNPA would encourage a sensitive approach to lighting, which conforms with the Institute of Lighting Professionals for lighting in environmental zones, and tries to achieve zero upwards light spill in all respects. Any lighting should also take into account the biodiversity sensitivities of the site and not disturb or harm wildlife. The Council's biodiversity officer should be able to advise further on this.
- 6.48 The matters that the SDNPA have raised for consideration have been addressed in the way that the Appeal Scheme has been shaped, and other matters such as light spill can be addressed at the detailed design stage.
- 6.49 In respect of views towards the National Park, there will inevitably be an impact on some localised views, most notably from the footpath and railway alongside the southern boundary of the Site. From these vantage points a

series of view corridors have been created through the development to allow framed views towards the South Downs. A new footpath has also been provided alongside the rife to allow more open views of the South Downs from what will become an attractive wildlife corridor. As with views from the South Downs towards the Site, it is important to consider the existing content of these views, with the heavily trafficked Littlehampton Road in the middle distance and urban development to the east and west.

- 6.50 My overall conclusion is that the Appeal Site lies on the urban fringe and, in itself, is of relatively limited landscape value. It also has detracting features, such as the overhead powerlines. It is in active agricultural use and has no public access, except for the two footpaths which border it. The only landscape feature of any particular merit is Ferring Rife which is to be retained and enhanced. It carries no designations for landscape quality or ecological interest.
- 6.51 The release of a greenfield site for development will inevitably give rise to a certain level of landscape harm but for the reasons I have already given, the Appeal Scheme has been landscape led and has been carefully crafted to respond to both its landscape and townscape setting in a sensitive manner. As such, it creates a more appropriate and softer boundary to the urban area than presently exists. It will also deliver ecological and recreational benefits. It will not introduce a form of development that is at odds with the prevailing character of the coastal plain and as such will not materially impact on the setting of the South Downs National Park.
- 6.52 Importantly, a broad swathe of farmland will be maintained between Ferring Rife and Littlehampton Road. By adopting such an approach, the Appeal Scheme will be separated from the National Park and an indentation in the settlement boundary will continue to be preserved. As the proposed landscaping along the northern edge of the Site matures, a robust and attractive edge to the settlement will be created which is consistent with the management objectives for development that falls within the setting of the National Park.



Dixies Barns, High Street, Ashwell,  
Hertfordshire SG7 5NT

t 01462 743647

e [ashwell@csaenvironmental.co.uk](mailto:ashwell@csaenvironmental.co.uk)

w [csaenvironmental.co.uk](http://csaenvironmental.co.uk)

Suite 1, Deer Park Business Centre, Eckington,  
Pershore, Worcestershire WR10 3DN

t 01386 751100

e [persshore@csaenvironmental.co.uk](mailto:persshore@csaenvironmental.co.uk)

w [csaenvironmental.co.uk](http://csaenvironmental.co.uk)

Gallery 1, Citibase, 95 Ditchling Road,  
Brighton BN1 4ST

t 01273 573871

e [brighton@csaenvironmental.co.uk](mailto:brighton@csaenvironmental.co.uk)

w [csaenvironmental.co.uk](http://csaenvironmental.co.uk)