

LANDSCAPE STATEMENT OF COMMON GROUND

APPLICATION REFERENCE AWDM/1264/20

APPEAL REFERENCE APP/M3835/W/21/3281813

SITE ADDRESS AND DESCRIPTION OF THE DEVELOPMENT

Land North West of Goring railway Station, Goring by the Sea, Worthing

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 adjacent railway station, undergrounding of overhead HV cables and other supporting infrastructure and utilities.

APPELLANT: Persimmon Homes

LOCAL PLANNING AUTHORITY: Worthing Borough Council

INTRODUCTION

1. This Statement of Common Ground (SoCG) has been prepared by CSA Environmental, who are acting on behalf of the Appellant, and Hankinson Duckett, who are acting on behalf of Worthing Borough Council (the Local Planning Authority).
2. The planning SoCG provides an accurate description of the Appeal Site and the surrounding area and as such that description is not repeated here. Similarly, the Planning SoCG describes the nature and content of the application and policy background.

MATTERS ON WHICH THE PARTIES AGREE

The submitted LVIA

3. The application was accompanied by a LVIA which, amongst other things, described the character of the Appeal Site and surrounding area. It also identified a series of representative viewpoints, from where the Site could be seen.

4. The Guidelines for Landscape and Visual Impact Assessments 3rd edition ('GLVIA3') notes in section 2.23-25, that professional judgement is a very important part of LVIA, and that even with qualified and experienced professionals there can be differences in the judgements made.
5. The methodology used within the LVIA is in line with the guidance in GLVIA3, and is acceptable.
6. The LVIA and addendum contain a proportionate review of local landscape character assessments and appraisals relevant to the Appeal Site.
7. The viewpoints in the LVIA identify the key representative viewpoints from which the Appeal Site should be considered.
8. Whilst acknowledging that the LVIA is fit for purpose, the parties disagree on a number of judgements that have been made in the document.

Designations

9. It is agreed that the Site is not designated as Local Green Space or Local Gap or Strategic Gap in the adopted Development Plan.
10. It is agreed that the Site is not located within a defined settlement boundary and it will therefore be considered as "countryside" in planning policy terms.
11. The Site itself does not currently carry any landscape, ecological or heritage designations.
12. The South Downs National Park lies immediately to the north of Littlehampton Road and whilst the Appeal Site falls outside of the National Park, it is nevertheless within its setting.
13. It is agreed that para 176 of the NPPF does not preclude development within the setting of a National Park but requires that 'development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas'. The NPPF also provides that great weight must be given to conserving and enhancing landscape and scenic beauty in National Parks, which have the highest status of protection in relation to these issues. The parties agree that the setting of the National Park is one of the key landscape matters to consider.

Visibility

14. A suggested walking route for the Inspector is contained in Appendix A of this SoCG. The parties agree that the plan identifies the main visual receptors which will be affected by the Appeal Scheme. In summary, these are:
 - The footpaths which cross the Site
 - Middle distance views from within the South Downs National Park
 - Neighbouring roads and footpaths.
 - Views from the appeal site, from within the proposed open space.

Context

15. A number of landscape studies of the local areas have been undertaken and it is agreed that they present a fair reflection of the character of the local area.
16. The South Downs National Park: Views Characterisation and Analysis of 2015, identifies a series of specific viewpoints which are representative of the views from the Park. It is agreed that view 31, from Highdown Hill, is the view which is most relevant to the setting of the Appeal Site. The justification for selecting this viewpoint is stated in the Views Characterisation Assessment 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'

17. The Views Characterisation and Analysis study provides guidance on the aims and management of these views. It is agreed that the following objectives are of particular relevance in assessing the Appeal Scheme:
 - *'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.'*

MATTERS ON WHICH THE PARTIES DISAGREE

18. The parties disagree on the baseline assessment of landscape and visual sensitivity and the level of landscape and visual effects that the appeal proposal would have on the character of the Appeal Site and the wider area.
19. The parties disagree on the level of effects on the landscape character of the immediate surroundings of the Appeal Site and degree of effects on the setting of the National Park.
20. The parties disagree on the extent to which the Appeal Site functions as a green gap which prevents the coalescence of settlements.
21. The parties disagree on the extent to which the Appeal Site functions as a Local Green Space.
22. The parties disagree with the role the appeal site in providing an undeveloped parcel of land in views of the coast from the National Park.

Signed on behalf of:

The Appellant:

Clive Self, CSA Environmental



Date. *6th January 2022*

Worthing District Council

Brian Duckett, HDA..... Date.....

Appendix A

Key views points and suggested walking route for the Inspector