



**PROPOSED NEW DEVELOPMENT OF UP TO 475 RESIDENTIAL DWELLINGS AND
ASSOCIATED OPEN SPACE, ON LAND NORTH WEST OF GORING RAILWAY STATION,
GORING BY SEA WORTHING, WEST SUSSEX**

PROOF OF EVIDENCE OF

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on behalf of

Worthing Borough Council

**Worthing Borough Council ref: AWDM/1264/20).
Planning Inspectorate ref: Appeal Reference: APP/M3835/W/21/3281813
HDA ref: 454.5
December 2021**

Proof for exchange

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1 INTRODUCTION

1.1 Qualifications and experience and methodology

1.1.1 I am managing director of Hankinson Duckett Associates (HDA), a landscape architectural, ecological and environmental planning practice. I have a BSc honours degree in Botany and a post graduate Diploma in Landscape Design. I am a chartered landscape architect, a member of the Landscape Institute and have been a landscape architect for over 30 years. HDA designs and implements landscape and masterplanning projects, carries out Environmental Impact Assessment and advises on environmental aspects of commercial, minerals, residential and recreational development for private and public bodies throughout Britain. HDA is a member of the Institute of Environmental Management and Assessment.

1.1.2 HDA has considerable experience of landscape and visual assessment and landscape character assessment, working for public and private bodies. I have managed and carried out district-wide Landscape Character and Landscape Capacity Studies for district councils, including Worthing Borough, Arun and Tandridge District Councils, advising on the appropriateness of sites for development across districts, including assessments of development within and adjacent to AONBs and other sensitive landscapes. HDA has completed a County-wide Landscape Character Assessment for Surrey County Council and a review of potential additional areas for inclusion in the Surrey Hills AONB on behalf of Natural England, the AONB board and Surrey County Council.

1.1.3 Worthing Borough Council refused outline planning permission on 11 March 2021 (application reference AWDM/1264/20) for the following development: "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 (Outline with all matters reserved)."

1.1.4 The application was refused for six reasons, Reason 1, as set out below relates to matters of landscape:

1. The proposed development is outside of the built-up area as defined in the Worthing Core Strategy and the emerging Submission Draft Worthing Local Plan and is not allocated for residential development. The proposal is therefore contrary to policy 13 of the Worthing Core Strategy and emerging policies SS4, SS5 and SS6 of the Submission Draft Worthing Local Plan, resulting in the coalescence of settlements and the loss of an important area of green space that contributes to local amenity, sense of place and wildlife. Furthermore, it is considered that the adverse impacts of the development would demonstrably outweigh the benefits as substantial adverse landscape and visual effects would arise from the development affecting the local area and the wider landscape, including the landscape setting to the National Park (therefore adversely affecting its statutory purpose to conserve and enhance its natural beauty and cultural heritage), Highdown Hill scheduled Monument and the Conservation Area.

1.1.5 HDA were instructed by Worthing Borough Council in September 2021 to review the CSA Landscape and Visual Impact Assessment of the proposed development which accompanied the application, carry out a further winter visual assessment and prepare landscape evidence for this inquiry. HDA were instructed by Worthing Borough in 2007, 2015, and 2017 to prepare landscape studies as to inform the Council on landscape sensitivity and capacity for development in the borough. The studies subsequently formed part of the evidence base to the Local Plan. I concur with the findings of these studies and that I am able to support the Council's position in so far as it relates to matters of landscape. I am familiar with the appeal site and its landscape setting; with the character of the local area; with the background of policy, guidance and consultation; and with the appeal proposals and their context.

1.1.6 The evidence which I have prepared and provide for this appeal, reference APP/M3835/W/21/3281813, in this proof of evidence is true and has been prepared and is given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions.

1.2 Scope of evidence

1.2.1 My evidence relates to the landscape and visual aspects of the appeal proposals. Specifically, it addresses the likely impacts of the proposed development and

associated landscape works on the appeal site and on the character and appearance of the surrounding landscape, the setting to the South Downs National Park and the local gap between Goring by Sea and Ferring.

1.3 Structure of evidence

1.3.1 My evidence is structured to consider the issues as follows:

- 1. Introduction**
- 2. Policy Context:** An appraisal of landscape aspects of planning policy against which the appeal proposals should be assessed.
- 3. Baseline Conditions**
- 4. Landscape Context:** An appraisal of the existing appeal site features, the landscape character of the appeal site and its immediate environs and the context of the appeal site in relation to the National Park and nearby settlement, the local landscape and the nature and extent of the gap between Goring by Sea and Ferring.
- 5. Existing visibility:** A review of the existing views of the appeal site and the appeal site's relationship and contribution to the character and visual amenity of the South Downs National Park (SDNP), local landscape and the gap between Goring by Sea and Ferring.
- 6. Assessment of Baseline Conditions**
- 7. The proposed development:** A description of the relevant aspects of the appeal proposals;
- 8. Landscape and visual assessment:** An assessment of the relevant aspects of the appeal proposals, in particular the landscape and visual impacts of the proposed development on the South Downs National Park, the separate identities of Goring by Sea and Ferring, on the surrounding landscape, public rights of way and roads and on the integrity of the gap between settlements .
- 9. Review against policy:** A review the appeal proposals against landscape aspects of policy and guidance.
- 10. Conclusions:** A summary of my evidence.

2 LANDSCAPE POLICY CONTEXT

2.1 National Planning Policy

The Framework

2.1.1 The National Planning Policy Framework (NPPF) revised in July 2021 covers all aspects of planning policy in one succinct document including the natural environment, green infrastructure, open space, recreation and play.

2.1.2 Para 174 provides that *“Planning policies and decisions should contribute to and enhance the natural and local environment by inter alia:*

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate”.

2.1.3 The appeal site lies adjacent to The South Downs National Park, a nationally designated area. Para 176 of the NPPF states.

“Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads. The scale and extent of development within all

these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

- 2.1.4 Section 12 of the NPPF relates to 'Requiring good design' and it is the Government's objective that developments:
- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
 - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
 - c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
 - d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
 - e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
 - f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience (Para 130).*

- 2.1.5 Section 15 of the NPPF also addresses 'Habitats and biodiversity' which requires Local Plans to: promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity (Para 179).

2.2 National Planning Practice Guidance (NPPG)

- 2.2.1 The NPPG was launched as a web-based resource on 6th March 2014. The guidance supports and informs the framework and sets out further specific guidance in relation to landscape assessment, green infrastructure and AONBs.
- 2.2.2 In relation to Landscape Character Assessment, the guidance (reference ID: 8-001-20140306) states that:

2.2.3 *“One of the core principles in the National Planning Policy Framework is that planning should recognise the intrinsic character and beauty of the countryside. Local plans should include strategic policies for the conservation and enhancement of the natural environment, including landscape. This includes designated landscapes but also the wider countryside. Where appropriate, landscape character assessments should be prepared to complement Natural England’s National Character Area profiles. Landscape Character Assessment is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change and may be undertaken at a scale appropriate to local and neighbourhood plan-making”.*

2.2.4 *“To help assess the type and scale of development that might be able to be accommodated without compromising landscape character, a Landscape Sensitivity and Capacity Assessment can be completed. To demonstrate the likely effects of a proposed development on the landscape, a Landscape and Visual Impact Assessment can be used.”*
(Paragraph: 037 Reference ID: 8-037-20190721 Revision date: 21 07 2019).

2.2.5 Paragraph 041 of the Landscape section deals with the approach to development within National Parks, the Broads and Areas of Outstanding Natural Beauty. *It notes that their status as landscapes of the highest quality has to be reflected in the design and location of all development in these areas, and refers to the considerations for development as set out in paragraph 172 of the NPPF. Development in the setting of one of these protected landscapes is covered in paragraph 042, which states that, where important long views from or to the designated landscapes are identified, or where the land within and adjoining the designated area is complementary, a sensitive approach which takes potential impacts into account will be needed to avoid significant harm.*

2.3 Local Development Plan

2.3.1 The development plan comprises the saved policies of the Worthing Local Plan and the Worthing Core Strategy (2011). Policy and relevant criteria germane to landscape and visual matters include;
Policy 13 The Natural Environment and Landscape Character, which provides that;

“Worthing’s development strategy is that new development needs can be met within the existing built up area boundary and, with the exception of the West Durrington strategic allocation, will be delivered on previously developed sites, therefore:

Residential development outside of the existing built up area boundary will only be considered as part of a borough-wide housing land review if there is a proven under-delivery of housing within the Core Strategy period.

Other proposals that support countryside based uses, such as agriculture and informal recreation may be considered if they are deemed essential and / or can contribute to the delivery of the wider strategic objectives. If development in these areas is proposed it must take into account and mitigate against any adverse effects on visual and landscape sensitivity”

Policy 14 Green Infrastructure:

“Worthing’s areas of green infrastructure will be improved and enhanced to maintain their quality and accessibility for residents and visitors.

Worthing’s existing areas of green infrastructure as set out in the Open Space, Sport and Recreation Needs Assessment Study will be protected from any development that will have an adverse effect on their environmental and visual quality.”

Policy 16 Built Environment and Design.

“Throughout the borough all new development will be expected to demonstrate good quality architectural and landscape design and use of materials that take account of local physical, historical and environmental characteristics of the area. In particular, new development should display a good quality of architectural composition and detailing as well as respond positively to the important aspects of local character, exploiting all reasonable opportunities for enhancement. Where appropriate, innovative and contemporary design solutions will be encouraged.

The settlement structure, landscape features and buildings which represent the historic character of Worthing should be maintained; preserving and enhancing existing assets. Where the quality of the existing building(s) or local character is weak, solutions need to be sought which raise overall quality”.

2.3.2 The Spatial Strategy of the Submission Draft Worthing Local Plan which has undergone Examination in Public includes relevant Policy. As noted in the Inspector's initial letter following the examination hearings, some modifications have been suggested to the wording of the draft policies.;

SS4 Countryside and Undeveloped Coast;

"a) Outside of the Built Up Area Boundary land (excluding sites designated as Local Green Spaces under SS6) will be defined as 'countryside and undeveloped coast'

b) Development in the countryside will be permitted, where a countryside location is essential to the proposed use",

SS5, Local Green Gaps

"The four areas listed below are designated as Local Green Gaps between the settlements of Worthing & Ferring and Worthing & Sompting/Lancing, and will be protected in order to retain the separate identities and character of these settlements. a) Goring-Ferring Gap; b) Chatsmore Farm; c) Brooklands Recreation Area and abutting allotments; and d) Land east of proposed development (site A15) at Upper Brighton Road. Outside of those areas designated as Local Green Space, all applications for development (including entry level exception sites) within Local Green Gaps must demonstrate that individually or cumulatively:

i) It would not undermine the physical and/or visual separation of settlements;

ii) It would not compromise the integrity of the gap;

iii) it conserves and enhances the benefits and services derived from the area's Natural Capital; and

iv) it conserves and enhances the area as part of a cohesive green infrastructure network.

SS6 Local Green Space (LGS).

"Development will not be permitted within a Local Green Space designated within the Local Plan or an approved Neighbourhood Plan unless there are very special circumstances as set out in the NPPF where the public benefits of the development proposed would outweigh the harm that would be caused by development within the Local Green Space. Enhancements consistent with Local Green Space designation will be supported and will be required where proposed

development, judged to meet the very special circumstances test, may impact the Local Green Space”.

b) Chatsmore Farm: Chatsmore Farm is designated as Local Green Space because of its community value: its setting to the historic environment and the South Downs National Park; important views that contribute strongly to a sense of place; wildlife, especially along the Ferring Rife; and the offer of escape from the urban environment for relaxation and exercise.

- 2.3.3 The Local Plan Inspector’s letter advises that the inclusion of The Chatsmore Farm site at its current extent would constitute an extensive tract of land. The Inspector has invited Worthing Borough to consider if a smaller parcel of land would serve the purpose of LGS.

3 BASELINE CONDITIONS

3.1 Introduction

- 3.1.1 The appeal site lies in undesignated landscape, close to the southern edge of the South Downs National Park, the edge being defined as the A259 Littlehampton Road. The appeal site lies, 225m at its nearest point from the National Park boundary, and forms parts of the setting of the National Park. The appeal site is the southern and 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 or Goring gap’ between the settlements of Ferring and Goring by Sea.

- 3.1.2 The appeal 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 flows west alongside the appeal site. The rife has limited riparian vegetation which includes occasional shrubs and small trees. A line of pylons runs east-west along the northern edge of the appeal site.

- 3.1.3 The appeal 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 3-4 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.

3.1.4 The appeal site has an area of approximately 19.9ha, and has no built structures on it with the exception of the transmission pylons.

3.2 Landscape and Visual Appraisal Methodology

The methodology used when carrying out my assessment is set out in Appendix 1 and incorporates the methodology used in the HDA landscape assessments undertaken for Worthing Borough in relation to site assessment for the emerging Local Plan evidence base.

3.2.1 The processes undertaken have been based on current guidelines as set out by the Landscape Institute and Institute for Environmental Management and Assessment (Guidelines for Landscape and Visual Impact Assessment Third Edition, (Routledge) February 2013) and more recent technical advice notes.

3.2.2 My landscape character assessment is based on Natural England 'Landscape Character Assessment Guidance'; the broad baseline being the National and County Landscape Character Assessments and a more detailed borough-wide character assessment which identifies local character areas, distinguished from each other by variations in elements such as topography, land uses, vegetation patterns and scale, and is set out in the HDA Worthing Gap and Landscape Capacity Study 2007 and Worthing Landscape and Ecology Studies 2015 and 2017 (Appendices 2-4).

3.2.3 My visual baseline considers the existing visibility of the parts of the site proposed for built development and for green infrastructure, and the locations with views towards the site. The assessment considers the worst-case scenario (winter views), the degree to which existing development close to the appeal site is visible, the change in the extent and composition of views resulting from the proposed development, and the effect on the setting to the National Park. Visual effects arising from the green infrastructure proposals are also assessed.

3.2.4 The effects of the proposed development on each feature, character area and viewpoint are assessed at the 'worst case' point; for example, when a tree is removed for access construction; both winter and summer views are considered in the overall visual assessment. Each element is then further assessed as it

would in the long-term following mitigation, with any replacement/enhancement planting in place and semi-mature.

3.2.5 For each notable feature or viewpoint, its 'sensitivity' to the proposed development is first assessed, as a combination of its susceptibility to development and its intrinsic landscape value. The likely degree of change arising from the proposed development ('magnitude of effect') has then been identified. The significance of the effect arises from a combination of sensitivity and magnitude of effect, taking professional judgement into account.

3.2.6 In the light of the most recent technical advice from Natural England, an overall rating of Landscape Sensitivity has been provided (combining assessments of landscape sensitivity, visual sensitivity and landscape value) of the assessment unit.

3.2.7 In summary, my assessment comprises:

- **Landscape assessment:** The effects of the proposed development, as set out in section 1 of my evidence, (both built development and green infrastructure) on the landscape – its character and landscape features such as landform or vegetation;
- **Visual assessment:** The likely visual effect of the proposed built development and green infrastructure – to what extent would existing views change, from viewers such as users of footpaths, bridleways and roads and local residents;
- **Significance of landscape/visual effects:** The degree (magnitude) of change is related to the sensitivity of the landscape/receptor, to provide an assessment of the significance of the landscape or visual effect. This includes the likely effects of landscape and visual changes on policy objectives.

3.2.8 The degree of significance of the landscape/visual effects of the proposed development is a product of the sensitivity and magnitude of effect as set out in the Significance Matrix for Landscape and Visual Impacts at Appendix 1.

3.2.9 These are summarised as:

Major significance of effect: An effect of international/national importance and is important to the decision-making process;

Substantial significance of effect: An effect of regional/district significance and could be a key decision-making issue; prominent changes to a sensitive view or substantial change or widespread loss of characteristic features in a sensitive landscape with little capacity for change;

Moderate significance of effect: An effect of local significance (i.e., a noticeable change in the view / landscape character in an average, ordinary landscape with some capacity to accommodate development or a smaller change within a more sensitive landscape); and may be a key decision-making issue – for example; in combination, the cumulative impacts of VRs with a moderate significance would be more significant (district/borough significance);

Minor significance of effect: An effect of very local significance and unlikely to be of importance to the decision-making process (i.e., small scale or temporary changes to view or to a low sensitivity landscape with capacity to accommodate development);

Negligible significance of effect: Minimal effect and not significant to the decision-making process.

3.2.10 Effects are judged to be ‘Significant’ (as set out in GLVIA pages 91 and 115) if they are assessed as being Substantial effects or higher and occasionally Moderate. I have used my professional judgement throughout the assessment, particularly in those cases where the outcome lies between two levels of assessment, such as Substantial and Moderate. This is reflected in the landscape and visual impact significance matrices. The significance is also assessed as to whether it contributes positively, i.e. beneficial; neither positively nor negatively, i.e. neutral; or negatively, i.e. adverse.

4 LANDSCAPE CONTEXT

4.1 An assessment of the wider area was carried out to verify the range and extent of landscape character areas and understand the wider context of the appeal site and its relationship with the surrounding landscape, adjacent settlements and any recent or future urban extensions proposed. The field survey also generated a photographic record.

4.2 The Landscape of Worthing Borough.

(with reference to plans in Appendix2)

4.2.1 Worthing Borough forms part of the urban conurbation which runs along the south coast between Bournemouth and Brighton. The majority of the Borough

occupies the coastal plain from Ferring in the west, to Lancing in the east. The only breaks in the almost continuous band of urban development, along this stretch of the coast, are the narrow gaps of largely agricultural land at the far eastern and western extremities of the Borough (which includes the appeal site).

4.2.2 The landscape of Worthing Borough spans the West Sussex coastal plain and the undulating dip slope hills of the South Downs. The contrasting geology and topography of the northern and southern parts of the Borough give rise to marked differences in landscape character.

4.3 Landform and Drainage

4.3.1 The southern part of the borough is a low lying and largely flat landscape rising from the coast to approximately 10m AOD. The coastal plateau gives way to the upper coastal plain, gently rising ground which runs inland as far as the A27 corridor and beyond which the landform becomes more pronounced and elevated and forms the distinctive chalk downlands of the South Downs National Park. The geology of the coastal plain is chalk with superficial deposits of sand and gravel. Chalk deposits surface to the north in the more elevated areas of downland and within the prominent chalk outlier of Highdown Hill to the north of the appeal site (rising to 81m AOD). Soils on the coastal Plain are generally Grade 1 and 2 with Grades 3 and 4 common on the downland landscape.

4.3.2 The generally free draining nature of the soils and underlying geology limit the number of ponds and water features in the wider countryside, however there are a number of water features scattered within upper coastal woodland around West Durrington within a belt of clay and silt running through the upper coastal plain. The Ferring Rife forms the main water course on the coastal plateau and runs through the western margins of Worthing. It forms the northern boundary to the appeal site, flowing north of Ferring and on into the sea west of the village.

4.4 Local land use

4.4.1 Undeveloped land immediately west of Worthing, on the coastal plain, is confined to a small number of large scale arable fields and a similar number of small sized fields maintained as grassland or in arable production. These fields sit between the residential districts of Worthing and Ferring (located in the adjacent district of Arun). Fernhurst Recreation Ground, close to Worthing Hall hospital, lies to the south of the Ilex Way and includes sports pitches and a cricket square.

4.4.2 To the north of the A259 there are further sports pitches, informal open space and large scale agricultural fields which give way, to the north, to the registered park at Highdown Gardens and the wider downland on Highdown Hill. Highdown Hillfort (a scheduled Monument) sits on this prominent outlier of chalk downland to the north of Highdown Gardens, the monument is set in open downland, with wooded chalk downland to the north and north-east.

4.5 Settlement pattern

4.5.1 Prior to the 20th century, Goring by Sea and Ferring were small nucleated settlements some distance apart from the appeal site. A green link, in the form of a Holm Oak avenue, was planted in the mid-19th century by David Lyon as part of the Goring Hall estate linking the two communities to the hall (located between the two settlements). The avenue, now referred to as Ilex Way, formed a mature evergreen treed link spanning the gap between the settlements. During the 1950s and 1960s development infilled the land between Ilex Way and the Brighton to Littlehampton railway line to the north. Development was largely single storey bungalow estates with occasional two storey houses. The treed avenue and the railway corridor have formed an enduring boundary to the development between the two settlements since that time. OS maps from the early 1970s illustrate the settlement pattern and extent of development in relation to the appeal site at that time and the gaps between the two settlements, a position largely unchanged to the present (Appendix 5).

4.5.2 There has been some further development to the north-east of Goring Street in Goring by Sea, with 3 storey flat roofed flats constructed during the 1970-80s and most recently to the south-east of the appeal site, alongside the railway line. However, the land between Goring Street and Ferring Lane to the west remains undeveloped.

4.5.3 Settlement south of Ilex Way has remained much as illustrated in the 1970 OS maps with very few incursions into the intervening agricultural land.

4.6 Appeal Site Landscape

With reference to Aerial photograph Appendix 7 and Appendix 2)

4.6.1 The appeal site comprises a single large arable field. The appeal site is flat, underlain by chalk with superficial sand and gravels deposits and classified as

best and most versatile land, Grade 1. The appeal site is free draining and the northern boundary is defined by Ferring Rife, a characteristic drainage feature on the coastal plain. There are no landscape features or built structures within the site, although a line of transmission pylons cross the site, east - west.

4.7 Land use and vegetation

4.7.1 The site is in arable production and is farmed as part of a wider agricultural holding. The appeal site is bounded to the east, alongside Goring Street, by intermittent hedgerows with hedgerow trees. To the south the site is fenced and contained by intermittent scrub and trees along the railway corridor. To the west public footpath no 2121/1 follows the site boundary north to the rear garden boundaries of Ferring Lane. Vegetation along the footpath alignment is limited to occasional trees, more dense planting follows the rear garden boundaries further north, with hedges and some tree planting. The northern boundary is defined by the Ferring Rife which has limited riparian vegetation which includes occasional shrubs and small trees and a grassland buffer strip to the adjacent agricultural fields.

4.8 Landscape Character Assessment

4.8.1 The National Countryside Character Initiative divides England into 159 'Character Areas'. The appeal site at Mallards Road is located within National Character Area Profile 126 South Coast Plain (Appendix 8). The key characteristics relevant to an assessment of the landscape character of the appeal site and its setting are set out below to give a broad regional context to the more detailed assessment that follows:

- The plain slopes gently southwards towards the coast.
- The under geology of flinty marine and valley gravels extends several miles inland to the dip slope of the South Downs and the South Hampshire Lowlands. This gives rise to deep and well-drained high quality soils.
- In places, streams and rivers flow south from the higher land of the Downs to the sea.
- There are stretches of farmed land between developed areas.

4.9 County and District Landscape Character Assessment

4.9.1 A Landscape Character Assessment was prepared at a County level within the West Sussex Landscape Character Assessment 2003 (Appendix 9), published by West Sussex County Council. The appeal site falls within the low-lying flat and

open landscape of the 'Littlehampton and Worthing Fringes' County Character Area SC11.

4.9.2 The key characteristics of this character area that are pertinent to the appeal site are:

- Low-lying, flat landscape.
- A dominant urban fringe with major conurbations of Littlehampton, Worthing and Lancing. Settlement edges sharply contrast with adjacent open countryside.
- Narrow gaps of open land at Kingston, Ferring, Compting and Lancing provide views to the sea and separation between settlements.
- Frequent urban fringe influences of horse paddocks, light industry, airport and recreational open space.
- Meandering Rifes and straight drainage ditches.
- Low density of hedgerows and hedgerow trees.
- Long views to the Downs.

4.9.3 One of the Key Issues for change identified within the assessment was '*The extension of the coastal conurbation*'. The related landscape sensitivities identified were the '*urban development pressures, especially in the gaps between settlements*' and '*closing open views between settlements*'.

4.10 Appeal Site Landscape Character

4.10.1 At a local level, the site forms part of the 'Goring Coastal Plain' local landscape character area as described in the Worthing Landscape and Ecology Study 2007 and 2015 (appendices 2 and 3). The area is characterised by open large-scale arable fields and extends to include fields to the north and west of the appeal site and the A259.

4.10.2 The appeal site reflects many of the key landscape characteristics of the county and local character areas. It is part of a working agricultural landscape and part of the narrow gap between Ferring and Goring by Sea. It provides long views of the Downs and there is a visual continuity between the appeal site landscape and the wider agricultural landscape and downland on Highdown Hill to the north. There is also a sharp contrast between the settlement edge and the agricultural landscape of the appeal site, the appeal site does not include urban fringe land uses such as horsti-culture or light industry. The character and appearance of the

appeal site is evident from public footpaths and local roads and the well-used, informal footpaths which follow the rife and field boundaries of the appeal site.

5 EXISTING VISIBILITY

5.1 Introduction

5.1.1 A number of potential visual receptors were identified to provide a detailed assessment of the visual effects of the proposed outline development. Potential receptors identified included dwellings, public roads and footpaths. My baseline landscape and visual assessment of the appeal site confirms the appraisals carried out in the previous HDA studies (in 2007, 2015 and 2017). I have undertaken additional site visits in winter months to establish the 'worst case scenario' in terms of the potential for adverse visual effects resulting from the appeal proposals.

5.1.2 The likely differences between summer and winter views are considered in the visual assessment. A distinction between public and private views has been made to accommodate the difference in sensitivity of visual receptors, private views are likely to be experienced by individual residents, whereas public views are likely to relate to those receptors engaged in the enjoyment of the landscape for its own sake, and thus may be given more weight.

5.1.3 Paragraph 6.17 of GLVIA states that:

"In some cases it may also be appropriate to consider private viewpoints, mainly from residential properties".

5.1.4 In March 2019, The Landscape Institute published technical guidance on Residential Visual Amenity Assessment (RVAA). Residential visual amenity is defined within the document as: *"The overall quality, experience and nature of views and outlook available to occupants of residential properties, including views from gardens and domestic curtilage. It represents the visual component of Residential Amenity".*

5.1.5 Paragraph 1.5 states that:

"Changes in views and visual amenity are considered in the planning process. In respect of private views and visual amenity, it is widely known that no one has 'a right to a view.' This includes situations where a residential property's outlook /

visual amenity is judged to be 'significantly' affected by a proposed development, a matter which has been confirmed in a number of / public inquiry decisions.

5.1.6 Paragraph 1.6 states:

"It is not uncommon for significant adverse effects on views and visual amenity to be experienced by people at their place of residence as a result of introducing a new development into the landscape. In itself this does not necessarily cause particular planning concern. However, there are situations where the effect on the outlook / visual amenity of a residential property is so great that it is not generally considered to be in the public interest to permit such conditions to occur where they did not exist before".

5.2 Visibility of the appeal site

(reference appendix 6 and 10)

5.2.1 The appeal site is open to view from Highdown Hill and its hill fort, a Scheduled Monument (SM), which lies within the South Downs National Park (SDNP), and to the north of the appeal site. The view is of particular importance to the setting of the South Downs National Park (SDNP). The SDNP View Characterisation and Analysis Study 2015 identified 78 key views from the National Park. Viewpoint 31 Highdown Hill (Appendix 10) is a representative view of the high downs looking south out to sea. One of its special qualities, identified in the study, was *"The elevated position of these viewpoints on the Downs above the coastal plain means this view type represents the 'breath-taking views' that are noted in the first of the Park's special qualities."*

5.2.2 The SDNP study is intended to provide a foundation for evidence on view types within the National Park and its setting to:

- support development management, including being used for evidence on landscape and visual matters;
- provide a snapshot of the National Park as it is today as a baseline against which future landscape change could be monitored for the 'State of the Park' Reporting;
- provide evidence about the setting of the park and the range of potential visibility to and from the park.

Highdown Hill is one of 30 monitoring points identified by the study as iconic or representative views within and out of the National Park.

- 5.2.3 The site forms a prominent part of the middle-distance landscape within views from the Highdown Hill including those views from the Scheduled Monument, adjacent public footpaths and land managed by the National Trust (appendix 6 CSA photograph 21). The appeal site and wider gap between Ferring and Goring by Sea are seen in the context of existing settlement and the English Channel beyond, which forms the distant horizon. The appeal site and adjacent fields form a substantial break in the development to the north of the main railway line, extending undeveloped land south from the National Park onto 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.
- 5.2.4 The site is also visible from high ground within the National Park, to the east of High Salvington (CSA photograph 22) , and, at a greater distance, from Cissbury Ring (CSA photograph 23), which is a hill fort and Scheduled Monument within the National Park to the north of Worthing.
- 5.2.5 At closer range, the appeal site is open to views from footpaths 2121 and 2121/1 (CSA photographs 1,2,15) and from the Goring Street (CSA photographs 6,7,10) and the A259. Although views from the road network are partially filtered by vegetation in places, there are open views to motorists, cyclists and pedestrians. The appeal site is also visible from properties which front onto the area and from trains on the adjacent 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.
- 5.2.6 There are uninterrupted views of the National Park, including Highdown Hill from public footpath 2121 which runs along the southern edge of the appeal site. Ferring Rife and the A259 corridor are noticeable features in the view but do not detract from the extent of the panoramic views or the quality of the views of the National Park. Pylons crossing the appeal site run along the northern boundary adjacent to the Ferring Rife, they are noticeable features but whilst occasionally breaking the skyline, they are not a dominant feature in the view. The appeal site, as seen from footpath 2121 and 2121/1, forms a significant part of the extensive, open and agricultural foreground setting to the National Park and Highdown Hill.

5.3 Perceptual/Experiential Landscape

- 5.3.1 The appeal site has an open character, it is single large scale field with no internal landscape structure. The appeal site has limited boundary vegetation to the western and northern margins which affords views of the elevated landscapes of the National Park. There are more substantial hedgerows and trees to the east. The boundary vegetation has a softening effect on the settlement edge, reducing the urbanising effect of existing residential development.
- 5.3.2 The appeal site is a working agricultural landscape forming part of the narrow tract of agricultural land between Ferring and Goring by Sea. The appeal site makes a significant contribution to the visual amenity afforded to the local footpath both in the experience of the gap between the two settlements and the open views of the South Downs National Park.
- 5.3.3 The site is not tranquil but is quiet with intermittent train noise and distant background noise associated with the A259, which is subject to wind direction and the time of day.

6 ASSESSMENT OF BASELINE CONDITIONS

6.1 Landscape Sensitivity

Introduction

- 6.1.1 The landscape sensitivity of a receptor comprises a combination of landscape value and susceptibility to change (see HDA Methodology Appendix 1). Landscape value can be derived from designations placed upon a landscape or where Local Plans refer to specific landscape qualities of an area. Where designations or such local plan references are absent, judgements can be made on quality criteria and experiential associations.
- 6.1.2 The appeal site does not lie within a designated landscape but does form part of the setting to the South Downs National Park. The recent revisions to the NPPF note the importance of setting to nationally designated landscapes stating that *“The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas”* (Para 176).

- 6.1.3 The sensitivity to change of a landscape receptor is reflected in the degree to which that area is able to accommodate change resulting from a proposed development without adverse effects on its character. This may be influenced by a number of factors which represent the susceptibility of the landscape to the proposed type of development, including the physical quality and perceived value of the landscape in question; general visibility (influenced by factors such as topography and vegetation); scale (of both the landscape and of the development), and robustness of the characteristic landscape elements.
- 6.1.4 The susceptibility of the landscape to the proposed development would also vary between receptors. In landscape terms, susceptibility is 'the ability of the landscape receptor to accommodate the proposed development without undue consequences for the maintenance of the baseline situation' (GLVIA Page 158). Landscape receptors within the wider landscape would be less susceptible to the changes brought about by a development than rural landscapes immediately adjacent to the site.
- 6.1.5 Landscape receptors are assessed in terms of their sensitivity by combining judgements of their susceptibility to the type of development proposed and the value attached to the landscape. Susceptibility factors are particular to the specific landscape and nature of the proposed development and are tailored to the project and graded on an incremental scale from high to low.
- 6.1.6 Landscape quality refers to the physical condition and state of repair of the landscape, and its intactness. Landscape value refers to the importance of the landscape to society, which may be due to a range of factors including its scenic beauty, cultural associations and tranquillity.

The appeal site

- 6.1.7 In respect of the appeal site HDA carried out three landscape assessments as part of landscape and ecological studies to inform the Worthing Local Plan (2007, 2015 and 2017). The appeal site falls within Site 5 which was assessed as three smaller compartments, following representations made to the initial 2007 HDA study. The majority of the appeal site formed the larger part of zone A and a small portion formed part of zone B. Zone C lies outside the Borough in Arun District.

- 6.1.8 Sites were assessed in terms of their susceptibility to development, on the basis of inherent landscape quality, the level of intactness and condition of the landscape, ecological sensitivity, the degree to which the site would be consistent with the existing settlement pattern; the contribution the site makes to the separation between settlements and their separate identities, visual sensitivity to development and the contribution the site makes to the surrounding landscape and, or, settlement. These factors were combined to arrive at an overall assessment of sensitivity.
- 6.1.9 A similar exercise was undertaken to assess the landscape value of the sites. The assessment of value was based on the landscape designations pertaining to the site, other designations which had a landscape dimension to the value of the site such as heritage assets or conservation areas, local distinctiveness, cultural associations and amenity value. Perceptual aspects such as tranquillity and remoteness were considered alongside the contribution the site made to outstanding assets, such as the National Park.
- 6.1.10 The results of this analysis, relevant to the appeal site, are set out in the 2015 study in summary tables (pages 52 and 53) and plans mapping borough-wide landscape and visual sensitivity and value (Figures 15-17 pages 17-19). The maps provide specific analysis of the sites but also illustrate the context and particular constraints which apply to the landscapes across Worthing Borough.
- 6.1.11 The Landscape and Ecology Study assessed Site 5A (which includes the larger part of the appeal site) and 5B (the remainder of the appeal site in the south-west corner). Area 5A was assessed as being **Major/Very High visual sensitivity**. In addition to a largely high visual sensitivity, Site 5A was judged to have high sensitivity in terms of its function as an open landscape between the settlements of Goring by Sea and Ferring. Site 5A was judged to have **Substantial/High landscape sensitivity** in relation to its contribution to the open character and setting of the surrounding landscape and settlement. My assessment, based on further site work and a review of the work carried out by HDA, is that the appeal site, within area 5A has Very High visual sensitivity and High landscape sensitivity.
- 6.1.12 Site 5B which forms the south-west corner of appeal site, where it adjoins with Arun District to the west, is partly contained to the north by vegetation, and forms

a slightly less prominent part of the visual separation between Goring and Ferring as seen from the National Park. The 2017 HDA study (appendix 4) identified a slightly lower sensitivity for Area 5B and assessed the area to have **Moderate/Medium landscape and visual sensitivity**, I concur with that assessment. For the avoidance of doubt I consider the overall sensitivity of the appeal site at paragraph 6.1.15 below.

Landscape Quality

- 6.1.13 The appeal site comprises a single field in agricultural production and forms part of a wider agricultural holding. The site is best and most versatile land classified as ALC Grade 1. The site, in common with other intensively farmed areas on the coastal plain, has a limited landscape framework. There are few landscape features of note bounding the site with the exception of the Ferring Rife which is of borough importance as an ecological feature. Overall the landscape quality of the appeal site is Moderate/Medium and given the agricultural land classification at the **higher end of Moderate/Medium**.

Landscape value

- 6.1.14 The appeal site is in itself an undesignated area of landscape, however it is clearly part of the coastal setting to the South Downs National Park, with Highdown Hill being a significant outlier to the south of the park, with open views across the site and the coastal plain. The site also forms part of the wider rural setting of the Highdown conservation area and Highdown Hillfort SM.
- 6.1.15 The appeal site and the adjacent fields are locally distinctive in that they form one of the few open gaps in settlement along the coastal plain, appreciated both from the National Park and the local footpath network. Whilst the appeal site is not remote, local footpaths cross the gap, between settlements, in a landscape which is relatively quiet, provides relief from the adjacent built up areas and affords a high degree of visual amenity with open views of the open downland landscapes to the north. The HDA study assesses the landscape value of area 5A as Substantial/High, I would concur with that assessment and confirm that the appeal site has a High landscape value.
- 6.1.16 The final assessment of Sensitivity considers all aspects of sensitivity, quality and value. Assessing the sensitivity of the appeal site to the type of development proposed I have assessed the **Overall Sensitivity as Substantial/High**.

6.1.17 In terms of the level of sensitivity of the South Downs National Park, to the north of the appeal site, I consider it to be, **Major/Very High** given the condition of the downland, the extensive footpath network with open and panoramic views across the coastal plain and English Channel. The area is removed and relatively remote from the urban conurbation and it is tranquil.

6.1.18 The neighbouring settlements of Ferring and Goring by Sea are characterised by 20th century development, housing including large bungalow estates, occasional 3 storey blocks of flats, light commercial and educational buildings and grounds and the Goring by Sea railway station. The townscapes are of a **Moderate/Medium sensitivity** to the proposed development.

6.2 The South Downs National Park

6.2.1 The appeal site is open to view from Highdown Hill and the scheduled hillfort which forms the high point in this south extension of the South Downs National Park (SDNP) and forms part of its setting. The view is of particular importance to the setting of the South Downs National Park (SDNP) as one of the key viewpoints in the park offering a representative view of the high downs looking south out to sea.

6.2.2 The South Downs National Park: View Characterisation and Analysis study 2015 (Appendix 10) identifies the main focus of the views and the relative sensitivity of views.

View 31 "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."(page 10)

6.2.3 *Viewshed analysis*

"Overlaying the ground level viewsheds from the representative viewpoints produces the map shown in Figure 2.2. This shows that the key areas of overlapping visibility are located along the coastal plain to the south of the Park (particularly between Fareham and Worthing),(my underlining) out to sea

(particularly up to 20km offshore), along the north facing escarpment, and across the lowland to the north of the Park. These areas are most frequently visible in the selected views and therefore indicate a potential for visual sensitivity both within the Park and its setting (Para 2.6)”.

6.2.4 The study also identifies the threats which could change the outlook of the park and its setting, namely;

“Threats to this type of view could result from changes that affect the iconic chalkland habitats of the downs or form intrusive new developments within the view either by day or night that affect the sense of tranquillity within the National Park. Many of these views are across the developed coast and therefore development forms an existing part of these views (often in the background)”.

6.2.5 As part of the Aims and Management Guidance set out in the study it advises the following;

- *...ensure that development outside the National Park does not block, or adversely affect the quality of views to 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”*.

6.2.6 As can be clearly seen from CSA photo 21 (Appendix 6), the site forms a prominent part of the middle-distance landscape within views from the Highdown Hill including those views from the Scheduled Monument, the adjacent public footpaths and land managed by the National Trust. The view’s principal focus is on the sea view. However as noted above, the existing development is often seen as “in the background” rather than as a dominant foreground or mid-ground component of the view. In respect of the views from Highdown Hill, the undeveloped landscape of the appeal site and the National Park are contiguous and form an undeveloped setting to the Hill fort and outlook from the hill. In terms of prominence the foreground and mid-ground contribute substantially to the view, the sea views form the visual horizon.

6.2.7 The appeal site is also visible from Highdown Rise (CSA photo 20) and from footpaths and public open spaces more distant and further to the east in the National Park (CSA photos 19, 20, 22 and 23 (my appendix 6)).

6.3 Goring by Sea & Ferring Local Gap

- 6.3.1 The appeal site is part of two areas of undeveloped and open land to the west of the Worthing conurbation. The northern area, referred to as the Goring Gap, is associated with Chatsmore Farm and located to the north of the Littlehampton to Brighton or 'West Coastway' railway line, it consists of the two large arable fields divided by the Ferring Rife (and includes the appeal site), along with a smaller arable field adjacent to the south-west which is located within Arun District.
- 6.3.2 The southern area, referred to as the Ferring Gap, is located on the coast, and consists of a large arable field along with some smaller grassland fields and areas of formal and informal recreation. The eastern portion of the Goring-Ferring Gap is located within Worthing Borough, while the western portion is within Arun District.
- 6.3.3 Between these gaps there is a central link of development running between Ferring and Goring by Sea. The development sits between two clearly defined boundaries, the West Coastway railway line to the north and Ilex Way to the south. The majority of the development, single storey bungalows, was constructed before the 1960s and the settlement pattern as seen today was largely in place by the early 1970s (see OS map Appendix 5). Notwithstanding this central link between the two settlements, much of Ferring and Goring by Sea remain distinct and separate settlements. That the open gaps are important to the separate identities of the settlements has been tested through the planning system and the status of the gaps protected through past planning policy.
- 6.3.4 In the early 1960s an application was made for housing development at 'Land North of Marine Drive, Goring-by-Sea'. Following a public inquiry, an appeal for housing on the site was dismissed by the Ministry of Housing and Local Government in May 1963 Decision letter (Appendix 11).
- 6.3.5 The Inspector in his report, concluded that "*there was continuous development along so much of this south coast that in order to relieve the monotony of this development, if for nothing else, it was most desirable to preserve the breaks there were in it, such as this one. Because there was so much pressure to live in this coastal strip, this should not, (in his view,) be an excuse for destroying these gaps or be a reason for finding room in this coastal area for all who sought it*". He considered that this particular gap should continue to be preserved as a public

open space and agricultural land. He recommended that the appeal be dismissed.

- 6.3.6 Subsequent applications for planning permission for residential development were refused in 1969 and 1972 with an appeal against the latter being dismissed in 1974. The Inspector noted that *“Among the people of Ferring the maintenance of this break also features a lively sense of being a separate community rather than an anonymous part of the larger Goring/Worthing amalgam”*.

6.4 Gap Policy

- 6.4.1 Until the revocation of the Structure Plans in 2011, both the Goring and Ferring Gaps were designated as ‘Strategic Gap’, the purpose of which was to prevent coalescence between settlements. Both Gaps are surrounded by housing on three sides and form the remaining separation between Worthing and Ferring, with the southern portion also maintaining an undeveloped coastline between the two settlements. The policy to designate these areas as gap was tested through the Structure and Local Plan process, being confirmed by Inspectors following EIP.
- 6.4.2 The importance of both Gaps was recognised in the Worthing Gap and Landscape Capacity Study, prepared by HDA on behalf of Worthing Borough Council in 2007. The study recommended retaining the southern area as a Strategic Gap, and recommended that the north area should be retained, and potentially extended northwards to include the fields at the foot of Highdown Hill.
- 6.4.3 Since the adoption of the Core Strategy in 2011 and in response to planning policy guidance, the Strategic Gap policy was withdrawn, however areas outside the existing built up area boundary are subject to Core Strategy Policy 13, which relates to the natural environment and landscape character.
- 6.4.4 Although the NPPF, introduced in 2012, does not provide for strategic gaps, a number of Local Plans have nevertheless designated Local Gaps in order to maintain the character and separate identity of adjacent settlements. The Adopted Local Plan for Arun District, which borders Worthing Borough to the west, does include a number Local Gaps in relation to its Policy SD SP3, including the western portion of the Goring Gap sites which fall within Arun District.

6.5 Assessment of the contribution the appeal site makes to the Goring local gap

6.5.1 My assessment of the contribution that the appeal site makes to the physical and visual sense of gap and separation between settlements can be summarised as follows.

6.5.2 The gap is clearly defined as the appeal site and the two adjacent fields. Together they form an open arable landscape (with no significant internal landscape structure) which forms the setting to existing settlements, separating the northern extents of Ferring and Goring by Sea.

6.5.3 In terms of the area of gap, the appeal site occupies approximately two thirds of the land within the gap between the two settlements.

6.5.4 Assessed from the National Park, the appeal site forms a substantial part of the open landscape in the middle distance view and the open character of the landscape bordering the park. There is a clear perception of gap between the two settlements north of the railway and the appeal site makes a substantial contribution to the extent and appearance of that gap.

6.5.5 The gap can be accessed and appreciated from the local footpath network and footpath 2121 forms a well-used route between the settlements (CSA photograph 2).

6.5.6 The appeal site is of high landscape and visual sensitivity, medium quality and high value to the form of development proposed.

6.5.7 Overall I assess the contribution the appeal site makes to the Goring Gap as **substantial**.

7 THE PROPOSED DEVELOPMENT

7.1 Development

7.1.1 The application is for the residential development of the land to provide up to 475 dwellings with the provision of a local centre, car parking, public open space, landscaping, vehicular access onto Goring Street and associated other works. The illustrative design of the development provides open space to the northern boundary and the Ferring Rife, undergrounds the transmission lines and

indicates landscape corridors within the development. Existing public footpaths are to be retained and further routes through open space provided. Development is largely proposed to be two storey with larger blocks associated with the proposed local centre. The application is in outline with all matters to be determined at reserved matters. There is no parameter plan against which to assess the scheme. I have therefore assessed the scheme on the basis of the concept masterplan, the Design and Access Statement and the illustrative landscape strategy none of which are secured at this stage in the planning process.

7.2 Illustrative Landscape Proposals

7.2.1 The main features of the landscape strategy include:

- Retention of the majority of landscape features to the site boundaries with the exception of Goring Street in the vicinity of the proposed site entrance.
- Provision of additional planting to the southern boundary of the site, to reinforce the railway-side screening between the site and land to the south.
- New native shrub and tree planting to the Ferring Rife.
- Street trees and amenity planting.
- Additional pedestrian and cycle connections to Ferring and Goring by Sea.
- Provision for SUD's features, to include a permanently wet habitat features.

8 LANDSCAPE AND VISUAL APPRAISAL OF THE PROPOSED DEVELOPMENT

8.1 Introduction

8.1.1 The methodology for assessing landscape and visual impacts is set out in my Appendix 1. I have based my assessment on the concept masterplan, landscape strategy plan and the Design and Access Statement and I refer to the CSA Landscape and Visual Impact Assessment that accompanied the application and provide further analysis of the predicted landscape and visual impacts below. When referring to viewpoints I have referenced the CSA photographs and the accompanying photo-location plans and appended them to my proof for ease of reference.

8.2 Visual assessment on completion

8.2.1 I have identified in section 6.1 above the extent of views into the site. Key views of the appeal site are from the National Park, the local footpath network, and from Goring Street and the A259 Littlehampton Road.

Views from the South Downs National Park

(with reference to CSA photo-location plans)

8.2.2 Viewed from the National Park, the appeal proposals would be most apparent from the Highdown Hill on public footpath 2139 and from the Scheduled Monument, Highdown Hill Fort (CSA photo 21). The view currently is an open and panoramic view of the coastal plain and the sea with the existing settlement set back beyond the appeal site. The appeal site is visually contiguous with the downland of the Park. The appeal site forms a substantial part of the mid ground in the view and forms a significant part of the rural setting to the National Park. It is one of the few gaps in the otherwise continuous built up coastal strip and provides visual separation between the northern extents of Ferring and Goring by Sea.

8.2.3 As illustrated in CSA photomontage 21, at completion the development would be prominent and would represent a noticeable change in the view, with the partial loss of a key element of the baseline view. New housing would replace open agricultural land, significantly reducing the agricultural and open character of the middle distance views. The development would bring the townscape northward towards the National Park and join the northern sections of Goring by Sea and Ferring. The magnitude of effects on views from Highdown Hill for walkers would result in a **Substantial Adverse effect**.

8.2.4 Views from Highdown Rise (CSA photo 20), which is located in the conservation area and is part of the registered park and garden at Highdown Gardens, would be adversely affected by the development. Views of Goring by Sea are distant and with the exception of the 3 storey development south of the railway, either contained by existing vegetation, or low in profile (the existing bungalows south of the railway). CSA photomontage 20 illustrates the prominence of the proposed development in the middle distance views. The magnitude of effects on views from Highdown Rise for pedestrians and car users would be Medium and the significance of effect **Substantial Adverse**.

8.2.5 Views from Highdown Gardens are largely inward looking focussing on the garden design and plant collection. The appeal proposals would have a **Negligible effect** on the visual amenity of the gardens.

8.2.6 More distant views from restricted byway 2139, the open space at Honeysuckle Lane and Cissbury Ring (CSA photos 18, 22, and 23) include the site as part of a wider view and whilst noticeable, as a well-defined area of agricultural land, it is a less prominent element in the view. The magnitude of effects varies from **Moderate to Minor Adverse**.

Views from public footpaths adjacent to the appeal site

8.2.7 The appeal site, as seen from footpath 2121 and 2121/1 (CSA photos 1, 2 and 15, forms a significant part of the extensive, open and agricultural foreground setting to the National Park and Highdown Hill and forms part of the northern gap between Ferring and Goring by Sea. The uninterrupted views of the National Park, including Highdown Hill would be lost to the development and replaced with urban residential views as footpath 2121 passes through the proposed development. Occasional glimpsed views might be possible, through the development, depending on the width and design of breaks in the housing layout. The removal of the transmission lines and pylons would have little benefit to the views from the public footpaths.

8.2.8 In addition to the loss of views of the National Park, the proposed development would effectively join the northern extent of Ferring, on Ferring Lane, to Goring on Sea, internalising the field in Arun District and removing, in large part, the northern gap between the settlements. The character and visual amenity of local footpaths 2021 and 2021_1 would be adversely affected by the appeal proposals. The magnitude of the change would be High and the significance of effect **Substantial Adverse**. The effects would also be permanent. The remaining gap between Ferring and Goring by Sea would be substantially reduced in area (approximately 30ha reduced to 13ha).

8.2.9 Additional footpaths are proposed to the northern edge of the development (as mitigation for the loss of views from the public rights of way) which would provide alternative views out towards the National Park. The views would be truncated and significantly closer to the A259 and subject to higher noise levels. The paths are likely to be between 110m-135m from the dual carriageway as compared

with a distance of 450-480m from footpath 2121 as it is currently aligned. In my view, the 'mitigation' does not adequately replace or compensate for, the loss of visual amenity of footpath 2021, either in respect of the appreciation of the gap between the settlements or the views of the National Park.

Views from roads and cycleways

A259, Littlehampton Road

8.2.10 The A259 Littlehampton Road is the principal road connection north of the appeal site. It has a footpath and cycleway along the southern edge and road users, cyclists and pedestrians have extensive and open views across the fields between Goring by Sea and Ferring. Currently with the exception of the 3 storey flats at Goring station settlement appears distant and is partly contained and screened by trees and vegetation.

8.2.11 Travelling west from the Goring Street junction on the A259 (CSA photo 10), there is a definite sense of leaving Goring by Sea, open fields in arable production dominate the view to the south-west. A similar sense of leaving Ferring is experienced travelling east on the A259, (CSA photo 12) although there are intermittent trees and shrubs in the central reservation which occasionally interrupt views. The depth of the fields in view, between the A259 and the railway line, would reduce by at least half with the construction of the development and housing would dominate the view across the remaining foreground landscape. There would be a hard and abrupt new edge to the settlement in relatively close proximity to road users, particularly pedestrians and cyclists. More distant views of single storey development interspersed with trees and vegetation would be replaced with much more immediate views of two storey development. At completion, the magnitude of effects on views from Littlehampton Road would be High and the significance of effect **Substantial Adverse**.

Goring Street

8.2.12 The appeal site is largely screened from view from Goring Street north of The Strand by roadside trees and hedgerows. South of The Strand (CSA photos 6 and 7) the site boundary is open with long views across the appeal site to Ferring. The existing development south of the railway, to the west of the school grounds is not prominent in the view. Whilst the illustrative layouts indicate some open space in front of the proposed development, the new housing would replace the long views towards Ferring with two storey housing and form a

prominent development in the view. The loss of views across the appeal site would continue south along Goring Street where roadside hedges and small trees would need to be removed to accommodate the new road access. The construction work and final development would be open to view from the road and from the adjacent houses, on the west side of the road. The proposed development would form a dominant feature in these views, substantially changing the character and appearance of the western edge of Goring by Sea. At completion, the magnitude of effects on views from Goring Street and the associated properties would be High and the significance of effect **Substantial Adverse**.

Singleton Crescent , Ferring Lane and Green Park

- 8.2.13 To the south and east the roads and footways are set back from the site boundary beyond existing residential development, which precludes open views of the appeal site (CSA photos 13 and 14). There would be views of the development, roofs and upper storey between existing bungalow and two storey houses, replacing glimpsed views of high ground in the National park to the north. The magnitude of effects would be Low and significance of effect would be **Minor Adverse**.
- 8.2.14 There would be views from housing fronting onto the appeal site on Goring Street with open views from some adjacent properties and similar views from Tara Penny Close and Olivia Close. Views from apartments south of the railway would have open views of the appeal site from second and third floor windows. Built development in the proposed Local Centre and adjacent housing would replace open views of the appeal site and the National Park.
- 8.2.15 Property to the west of the school playing fields, which is largely single storey bungalows and chalet bungalows would have limited views of the appeal site across the railway line. Views may include the wider landscape including Highdown Hill. Property in Ferring largely backs onto the field adjacent to the appeal site, although some directly back onto the appeal site. Views of the appeal site are screened to an extent by garden vegetation and fencing which would allow partial and glimpsed views of the western edge of the development.
- 8.2.16 There are a limited number of properties with open views of the entire site due to the intervening hedgerow and garden vegetation. Given the size and location of

the proposed development, the nature of the views and the distances between the existing properties and new development the effects on outlook would not be visually overbearing, overwhelming or oppressive. The visual amenity of existing dwellings close to the site would not be significantly affected by the scheme.

Visual effects: Conclusions

- 8.2.17 My assessment of the visual impacts of the appeal proposals on the public vantage points around the site clearly identifies that there are **substantial adverse visual effects** during construction and at occupation of the scheme. The development would, by virtue of its open boundary to the north and the necessity to remove hedgerows to the west, be a prominent feature in the view. The development would substantially change the character and appearance of the appeal site and the land between Goring by Sea and Ferring.

Summary table of effects: Visual

Visual receptor	Visual Sensitivity	Impact and Mitigation	Magnitude of change	Type of impact	Significance of effect
View from A259 CSA photos 9,10,11,12 and 17	Medium (Road users) Medium – High (pedestrians)	Existing built development distant to the south – single storey with treed horizon. Major alteration to key elements of the baseline view. Loss of gap and new development more prominent in the view. Footpath on south – side and open and continuous views. New planting and pylons removed.	At completion: High	At completion: Temporary new planting yet to establish	At completion: Substantial Adverse (road users) Substantial Adverse (pedestrians)
			15 years into operation: Medium	15 years into operation: Permanent:	15 years into operation: Moderate Adverse (road users) Moderate Adverse (pedestrians)
Views from Goring Street (CSA photos 6,7,8,16)	Medium (Road users) Medium – High (pedestrians)	Existing open views from Goring Street and additional open views at photo location 6 when access implemented. Open agricultural setting to Goring by Sea lost to development.	At completion: High	At completion: Temporary: hedgerows lost, new planting yet to establish	At completion: Substantial Adverse (road users) Substantial Adverse (pedestrians)
			15 years into operation: Medium	15 years into operation: Permanent: established planting	15 years into operation: Moderate Adverse (road users) Moderate Adverse (pedestrians)
Views from public footpaths 2121 and 2121_1 (CSA photos 1,2,and 15)	High	Permanent loss of panoramic views north of the SDNP replaced with urban residential views along footpath. Occasional glimpses north through development.	At completion: High	At completion: Permanent	At completion: Substantial Adverse
			15 years into operation: High	15 years into operation: Permanent:	15 years into operation: Substantial Adverse
Views from coastal railway line	Medium	Passengers travelling will have open views across site to SDNP and experience the northern gap between settlements. Stopping trains will experience longer duration of the view. View lost to new development and proposed structure planting.	At completion: Medium	At completion: Permanent	At completion: Moderate Adverse
			15 years into operation: Medium	15 years into operation: Permanent:	15 years into operation: Moderate Adverse
View from Goring by Sea railway station footbridge (CSA photo 5)	Medium	Open views across appeal site and gap towards the National Park. Proposed Local Centre and New residential development would block views north and west across the gap and to the NP.	At completion: High	At completion: Permanent	At completion: Substantial Adverse
			15 years into operation: High	15 years into operation: Permanent	15 years into operation: Substantial Adverse

Summary table of effects: Visual

Visual receptor	Visual Sensitivity	Impact and Mitigation	Magnitude of change	Type of impact	Significance of effect
View from Singleton Crescent and grounds of Chatsmore Catholic High School CSA photos 12 and 21 reverse views	Medium – High (pedestrians)	Glimpsed views of the appeal site and high ground to the north of the site between bungalows. Views from the school buildings screened by intervening built development. Views to Highdown Hill from the school playing fields. Views lost to new development.	At completion: Low	At completion: Temporary new planting yet to establish	At completion: Minor Adverse
			15 years into operation: Low	15 years into operation: Permanent:	15 years into operation: Minor Adverse
Views from Ferring Lane and Green Park (CSA photos 13,14)	Medium – High (pedestrians)	Existing glimpsed views from Ferring Lane and partial views from Green Park. Replaced with glimpses of new development and planting.	At completion: Low	At completion: Temporary: new planting yet to establish	At completion: Minor Adverse
			15 years into operation: Low	15 years into operation: Permanent: established planting	15 years into operation: Minor Adverse
Views from Highdown Rise (CSA photo 20)	High	Permanent loss of a key element in the baseline view from the conservation area and access to the registered park. Existing settlement forming distant backdrop to view.	At completion: Medium	At completion: Temporary: new planting yet to establish	At completion: Substantial Adverse
			15 years into operation: Medium	15 years into operation: Permanent:	15 years into operation: Substantial/ Moderate* Adverse
Views from Highdown Gardens	High	Views from the garden are limited due to planting and general enclosure of the site. Views largely focused on the garden and plant collection	At completion: Very Low	At completion: Permanent	At completion: Negligible
			15 years into operation: Very Low	15 years into operation: Permanent:	15 years into operation: Negligible
View from Highdown Hill, FP2139 and Highdown Hill Fort SM. (CSA photo 21)	Very High	Open, panoramic views across appeal site and gap towards the sea. Site forms a substantial part of the mid ground in the view, a significant part of the rural setting to the National Park. Planting and removal of pylons proposed	At completion: Medium	At completion: Temporary: new planting yet to establish	At completion: Substantial Adverse
			15 years into operation: Medium	15 years into operation: Permanent	15 years into operation: Substantial Adverse

Summary table of effects: Visual

Visual receptor	Visual Sensitivity	Impact and Mitigation	Magnitude of change	Type of impact	Significance of effect
View from FP 2139 and Restricted Byway 2139_4 (CSA photo 18)	High	Limited views from FP 2139. More open views from the restricted byway where the proposed development would be prominent in the mid distance views	At completion: Medium	At completion: Temporary new planting yet to establish	At completion: Moderate Adverse
			15 years into operation: Medium - Low	15 years into operation: Permanent:	15 years into operation: Moderate - Minor Adverse
Views from public open space on Honeysuckle Lane, High Salvington (CSA photo 22)	High	Conspicuous area of agricultural land within the wider view. Located centrally in the view from a number of walking routes across the open space. Immediate fore ground and backdrop to appeal site id wooded. Planting proposed to northern edge.	At completion: Medium	At completion: Temporary: new planting yet to establish	At completion: Moderate Adverse
			15 years into operation: Medium - Low	15 years into operation: Permanent: established planting	15 years into operation: Moderate - Minor Adverse
Views from Cissbury Ring (CSA photo 23)	Very High	Distant view of the appeal site seen as part of the coastal plain. Housing areas on the upper coastal plain occupy the intervening land. New development on the appeal site discernible but not prominent in the view.	At completion: Very Low	At completion: Temporary: new planting yet to establish	At completion: Minor Adverse
			15 years into operation: Negligible	15 years into operation: Permanent: established planting	15 years into operation: Negligible

8.3 Landscape Assessment at Completion

Landscape Features/Resources

- 8.3.1 The proposals would lead to the loss of approximately 20ha of Grade 1 best and most versatile agricultural land which would be a permanent **Substantial Adverse** effect.
- 8.3.2 The scheme, as illustrated on the CSA plan no /2304/118 would require a roundabout and realigned road approaches to access the site. This would necessitate the removal of approximately 90m of hedgerow along the appeal site frontage to Goring Street, and a further 740m² of small trees, scrub and bramble to the east of the appeal site. The hedgerows and trees consist of mixed deciduous native species up to 3-4m in height. A high proportion of the trees are elm and likely to be affected by Dutch Elm disease. Other hedgerows along Goring Street and individual small trees and shrubs alongside Ferring Rife would be retained and unaffected. The magnitude of effect would be **Low** and the significance of the effect **Minor Adverse**.
- 8.3.3 There would be **Negligible** effects on the Ferring Rife and **Minor** effects on public footpaths if moved to a more northerly alignment to accommodate proposed planting.

Landscape character

- 8.3.4 The appeal site falls within the low-lying flat and open landscape of the 'Littlehampton and Worthing Fringes' County Character Area SC11 which identifies narrow gaps of open land at Ferring as providing views of the sea and separation between settlements. One of the key issues for change identified within the assessment was '*The extension of the coastal conurbation*'. The related landscape sensitivities identified were the '*urban development pressures, especially in the gaps between settlements*' and '*closing open views between settlements*'.
- 8.3.5 At a local level, I have identified that the northern Ferring to Goring by Sea gap is characterised by open large-scale arable fields and extends to include fields to the north and west of the appeal site as far as the A259.
- 8.3.6 The appeal site is part of a working agricultural landscape, part of the narrow gap which provides long views of the Downs and National Park and a clear sense of

separation between Ferring and Goring by Sea to the north of the railway. The appeal site does not include urban fringe land uses such as horse-culture or light industry. The character and appearance of the appeal site and its relationship with the National Park is evident from public footpaths and local roads. The separate identities of both settlements north of the railway corridor is also clear in views from the footpath and road network.

- 8.3.7 The greater part of the northern gap landscape would be lost to the proposed development, replacing the working agricultural landscape with housing, a local centre and open space. The proposed housing would physically and visually link the northern extents of Ferring with Goring by Sea. The perception of a functioning landscape between the two settlements, north of the railway, would be substantially diminished and the character and appearance of the landscape character area adversely affected. The magnitude of change would be High and the significance of effect would be **Substantial Adverse and permanent..**
- 8.3.8 The Littlehampton and Worthing Fringes County Character Area SC11 extends north beyond the A259. It is also situated in close proximity to the appeal site and lies within the National Park. It currently has a rural character largely unaffected by adjacent settlement to the east. The appeal proposals would be prominent in the views south and would adversely affect the character and appearance of the land to the north of the A259. The magnitude of change would be Medium and the effect at completion would be **Substantial Adverse.**
- 8.3.9 Highdown Hill forms a southern promontory in the National Park and is situated within SC12 Angmerring Upper Coastal Plain. The elevated nature of the character area affords panoramic views across the coastal plain. In many instances the south coast conurbation is 'cheek by jowl' with the National Park (eg at Angmerring and West Darrington), which has an adverse effect on the character and appearance of the margins of the National Park, affecting amenity, remoteness and tranquillity. In respect of Highdown Hill the relationship between the conurbation and the National Park is different, with the settlement set back and open farmland adjoining the park landscape. The appeal proposals would substantially erode this relationship, affecting the landscape setting to the park with a substantial increase in built development within the setting to the park. The magnitude of change would be Medium – Low and the significance of effect **Moderate Adverse.**

Summary table of effects: Landscape

Landscape receptor	Landscape Sensitivity	Impact and Mitigation	Magnitude of change	Type of impact	Significance of effect
Site trees	Medium	No significant loss of trees to boundaries, no loss of trees within site. Potential to plant new tree planting	At completion: Low	At completion: Temporary new planting yet to establish	At completion: Minor adverse
			15 years into operation: Low - medium	15 years into operation: Permanent:	15 years into operation: Minor - Moderate Beneficial
Hedgerow and hedgerow trees to boundaries	Medium	New planting to replace hedgerow and hedgerow trees to Goring Street. Reinforcement of hedgerow planting to the, southern and western boundaries. planting within open space	At completion: Low	At completion: Temporary: new planting yet to establish	At completion: Minor adverse
			15 years into operation: Medium	15 years into operation: Permanent: established planting	15 years into operation: Moderate Beneficial
Watercourse	High	Retention of rife with informal open space and internal tree and shrub planting	At completion: Very Low	At completion: Temporary: proposals to establish	At completion: Negligible
			15 years into operation: Low	15 years into operation: Permanent: enhancement of water-side habitat	15 years into operation: Minor Beneficial
Public footpaths and access	High	Footpath 2121 would require diversion to allow for planting and bunding proposed to the southern boundary. Without reinforcement of southern boundary vegetation would not screen development from the railway or existing settlement.	At completion: Low	At completion: Temporary: new planting yet to establish should footpath be realigned.	At completion: Minor Adverse
			15 years into operation: Very Low	15 years into operation: Permanent:	15 years into operation: Negligible
Land use	High	Best and most versatile land lost to development	At completion: High	At completion: Permanent	At completion: Substantial Adverse
			15 years into operation: High	15 years into operation: Permanent	15 years into operation: High
Heritage assets	High	No registered heritage assets within site. No direct effect on registered park, or Scheduled Monument No listed buildings within or adjacent to the site	At completion: Very Low	At completion: Permanent	At completion: Negligible
			15 years into operation: Very Low	15 years into operation: Permanent	15 years into operation: Negligible

Summary table of effects: Landscape

Landscape receptor	Landscape Sensitivity	Impact and Mitigation	Magnitude of change	Type of impact	Significance of effect
LCA: SC11 (the appeal site and fields to the immediate west and north)	High-medium	Loss of substantial area between settlements. Notable change in landscape character over an extensive area. Loss of gap	At completion: High	At completion: Permanent	At completion: Substantial Adverse
			15 years into operation: High	15 years into operation: Permanent:	15 years into operation: Substantial Adverse
LCA:SC11 (north of A259 and within the SDNP)	High	Appeal site one field removed from NP boundary. No visual separation between site landscape and wider SC11 or SDNP. Impact on rural setting to the NP. Some potential for mitigation planting.	At completion: Medium	At completion: Temporary: new planting yet to establish	At completion: Substantial Adverse
			15 years into operation: Medium	15 years into operation: Permanent: established planting	15 years into operation: Substantial - Moderate Adverse
LCA: SC12	Very High	Includes the southern extension of the SDNP at Highdown Hill, the Scheduled monument and registered garden and its access. On the coastal plain one of the few gaps within the conurbation is open to view, between Ferring and Goring, part of the setting to the SDNP. Winter effects more pronounced	At completion: Medium-Low	At completion: Temporary: proposals to establish	At completion: Moderate Adverse
			15 years into operation: Medium-Low	15 years into operation: Permanent: established planting	15 years into operation: Moderate Adverse
Ferring and Goring by Sea townscape	Medium	Settlement adjacent to a working agricultural landscape. No urban fringe land uses or features. Adjacent land provides rural setting to townscape and separation between settlements. Open character lost to proposed development.	At completion: High	At completion: Permanent.	At completion: Substantial Adverse
			15 years into operation: High	15 years into operation: Permanent:	15 years into operation: Substantial Adverse

8.4 Goring by Sea to Ferring Local Gap

8.4.1 My assessment of the sensitivity of the landscape between Ferring and Goring by Sea is that it performs a gap function, maintaining the separate identities of both communities and its sensitivity to future development was High. That assessment was based on (i) the limited extent of undeveloped land between Ferring and Goring by Sea; (ii) the openness of the landscape, with a lack of any well-developed internal landscape structure to the gap; and (iii) the well-defined and relatively contained edges to the existing settlements. It reflects the conclusions of the HDA 2007 assessment of the then current Strategic Gap and the findings of Planning Inspectors who have assessed both policy and appeal proposals for development within the wider Ferring Gap.

8.4.2 Within the visual envelope of the appeal site, the sense of openness and physical separation between Ferring and Goring by Sea is provided in large part by the appeal site. The extent of gap between the settlements currently covers an area of approximately 30ha, the proposed development would reduce that to 13ha. The gap would be split between the small field in Arun district surrounded by development and a single field fronting onto the A259. The proposed development would result in a significant and permanent reduction and narrowing of the gap between Ferring and Goring by Sea.

8.4.3 In terms of the landscape character and the perception of the gap, the appeal site lies currently contributes substantially to the rural and undeveloped character of the area, both in respect of the setting to both communities and as a working agricultural landscape. The urban influence of existing residential development on the gap is limited, particularly the effects of single storey bungalows to the south of the railway line. There is also no sense that the appeal site is affected by urban fringe land uses or 'overspill' from the adjacent domestic gardens in Ferring, a common issue with urban edge landscapes.

8.4.4 The appeal proposals would materially impact on the rurality of the gap. New development would be extensive and open to view from the north, within the South Downs National Park and from footpath 2121 and the A259. The effect on the visual amenity of the public footpaths, particularly footpath 2121, would be substantial adverse and permanent. The sense of moving through a landscape between settlements would be lost. The open, rural views of the appeal site and

wider views of the National Park would be screened and replaced with views of an urban landscape. The remaining gap would be inadequate in terms of separating the settlements, and the urban influence of the proposed development on the remaining gap would be considerable.

- 8.4.5 In respect of the overall impact of the appeal proposals on the gap between Ferring and Goring by Sea, I have assessed that the magnitude of change would be High and the significance of effect would be **Substantial Adverse**.

8.5 Landscape and Visual Assessment: Residual Impacts

Landscape assessment

- 8.5.1 My assessment of the residual effects of the development is based on the change to the landscape and the extent to which the appeal proposals avoid the treats identified in the County LCA to the character and appearance of the character areas and whether the proposals meet the management objectives set out in the LCA guidelines.

Integration of new development

- 8.5.2 Over a 15-year period, the landscape proposals for the development seek to establish a green buffer to the north of the housing. The establishment of the new hedgerows and small woodland blocks to the north-west corner of the appeal site would assist in softening the western edge of development as illustrated in photomontage 12, a view from the A259. However that depth of planting and open space is absent from the central and eastern parts of the site where the illustrative planting strategy would be inadequate and leave open views of the new development from the road corridor. No photomontages are provided of this view when leaving Goring by Sea.
- 8.5.3 The northern boundary planting strategy is also less effective in respect of the more elevated views of the development from the National Park where much of the housing would still be open to view.
- 8.5.4 The northern boundary of the appeal site follows the line of the Ferring Rife. Given the ecological interest in the water course dense planting along its length, to help screen the development would be inappropriate as shading of the water course would have adverse effects on the flora and fauna in and adjacent to the Rife.

8.5.5 The degree to which the new development would be visible would also be season-dependent. In winter months, the development would be more open to view, given the limited depth and extent of tree planting proposed. The urban influence on the remaining gap between Ferring and Goring by Sea would be substantial. The much reduced extent of the gap, in effect the field adjacent to the A259 would be substantially affected by the close proximity of the new development. My assessment of the residual effects of the development is that the remaining gap would be insufficient to provide a credible sense of separation between the two communities. The landscape proposals would not provide a suitable or robust edge to the development and there would be a perceived sense of coalescence between the two settlements.

8.6 Summary of residual impacts

8.6.1 The proposals would involve the loss of approximately 20ha of Grade 1 Best and most versatile agricultural land a loss of a finite resource and the associated productive land uses .

8.6.2 15 years after the completion of the development, there would be significant residual adverse landscape and visual impacts. There would be an adverse impact on key view points within the South Downs National Park, an adverse impact on local landscape character, a substantial reduction in the extent and openness of the gap between Ferring and Goring by Sea, and an adverse impact on the visual amenity of the local footpath and road network.

9 LANDSCAPE POLICY CONSIDERATIONS

9.1 National Planning Policy

The Framework

9.1.1 Para 174. *“Planning policies and decisions should contribute to and enhance the natural and local environment by inter alia:*

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

- 9.1.2 My Landscape and visual assessment has identified that there would be a permanent loss of 20Ha of Grade 1 best and most versatile agricultural land and a substantial adverse impact on the character and appearance of the local landscape.
- 9.1.3 The appeal site lies adjacent to The South Downs National Park, a nationally designated area. Section 15, Para 176 states.
“The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.”
- 9.1.4 The scale and extent of the development proposed would lead to an unacceptable level of harm to the setting of the South Downs National Park, adding substantially to the south coast conurbation in a location where a gap in the built up area provides an open agricultural setting to an identified key view point.
- 9.1.5 Section 12 of the NPPF relates to ‘Requiring good design’ and it is the Government’s objective that developments:
“a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;”
- 9.1.6 The appeal site would have an adverse effect on the character and appearance of the local landscape and would not add to the overall quality of the local landscape. The current landscape proposals would be ineffective at containing the development and mitigating the incursion into the local gap between Ferring and Goring by Sea. The extent and location of the landscape proposals, taking into account seasonal variation would not adequately mitigate the potential impacts of the proposed development. The replacement of a large proportion of

the gap between Ferring and Goring by Sea with housing would not maintain the sense of place which currently exists between the two communities.

9.2 Local Development Plan

Core Strategy

- 9.2.1 Policy 13 The Natural Environment and Landscape Character;
- 9.2.2 My landscape and visual assessment has identified significant residual effects on the appeal site and within the National park and the local landscape. In this respect the appeal proposals fail to meet the objectives of Policy 13
- 9.2.3 Policy 14 Green Infrastructure:
- 9.2.4 The appeal site falls within identified green space as set out in the open space study (June 2018). There would be a permanent loss of open space between the settlements of Ferring and Goring by Sea and an adverse effect on the environmental and visual quality of the local area.
- 9.2.5 Policy 16 Built Environment and Design. “
- 9.2.6 The settlement structure, which has been an enduring feature of the relationship between Ferring and Goring by Sea for some 50 years would be substantially altered with the construction of 475 houses in the gap between the northern half of Ferring and Goring by Sea. The appeal proposals fail to take account of the open character of the landscape and the visual amenity that affords to the local public footpath network and pedestrians and cyclists in the local area.

9.3 The Spatial Strategy of the Submission Draft Worthing Local Plan

- 9.3.1 The compliance or otherwise of the proposed development with the emerging Local Plan in landscape terms is a material consideration to the determination of the appeal.
- 9.3.2 SS4 Countryside and Undeveloped Coast;
“a) Outside of the Built Up Area Boundary land (excluding sites designated as Local Green Spaces under SS6) will be defined as ‘countryside and undeveloped coast’

b) Development in the countryside will be permitted, where a countryside location is essential to the proposed use”,

9.3.3 The appeal proposals do not require a countryside location.

9.3.4 SS5, Local Green Gaps;

“The four areas listed below are designated as Local Green Gaps between the settlements of Worthing & Ferring and Worthing & Sompting/Lancing, and will be protected in order to retain the separate identities and character of these settlements. a) Goring-Ferring Gap; b) Chatsmore Farm; c) Brooklands Recreation Area and abutting allotments; and d) Land east of proposed development (site A15) at Upper Brighton Road. Outside of those areas designated as Local Green Space, all applications for development (including entry level exception sites) within Local Green Gaps must demonstrate that individually or cumulatively:

i) It would not undermine the physical and/or visual separation of settlements;

ii) It would not compromise the integrity of the gap;

9.3.5 My landscape and visual assessment of the proposals has demonstrated that the scale and location of the housing development would undermine the physical and visual separation between Ferring and Goring by Sea. The new development would in effect join the northern extent of Ferring with the western edge of Goring by Sea, compromising the integrity of the gap between settlements and substantially diminish the separate identities of the two communities.

9.3.6 SS6 Local Green Space (LGS);

“Development will not be permitted within a Local Green Space designated within the Local Plan or an approved Neighbourhood Plan unless there are very special circumstances as set out in the NPPF where the public benefits of the development proposed would outweigh the harm that would be caused by development within the Local Green Space. Enhancements consistent with Local Green Space designation will be supported and will be required where proposed development, judged to meet the very special circumstances test, may impact the Local Green Space”.

9.3.7 The designation of Chatsmore Farm, as a Local Green Space (LGS), is not clear until such time as the Council has reviewed the extents of both Ferring /Goring by Sea Local Green Spaces. The HDA Goring Gap Local Green Space Landscape Statement (appendix 12) sets out the reasoned justification for the LGS. In respect of the Local Plan Inspector's letter, which advises that the inclusion of The Chatsmore Farm site at its current extent would constitute an extensive tract of land, he also confirms that the proposed LGS at Chatsmore Farm meets the first two tests as set out in the NPPF.

9.3.8 The extent to which a LGS can be defined over a smaller area will be considered in further work to be undertaken in 2022 and the results inform Worthing Council as to which, if any parts of the Chatsmore Farm site, should be included in a future LGS.

10 SUMMARY AND CONCLUSIONS

10.1 Baseline Assessment

10.1.1 The appeal site lies in undesignated landscape, close to the southern edge of the South Downs National Park, as such it forms part of the setting to the National Park. 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, 'the northern or Goring gap' lying between the settlements of Ferring and Goring by Sea.

10.1.2 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 along the northern edge of the appeal site.

10.1.3 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

- 10.1.4 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.
- 10.1.5 At a local scale, the site forms part of the 'Goring Coastal Plain' local landscape character area (HDA landscape study 2007). 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

- 10.1.6 The appeal 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.
- 10.1.7 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.
- 10.1.8 At close 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.
- 10.1.9 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

- 10.1.10 I have assessed the Overall sensitivity of the appeal site to housing development as Substantial

10.2 Assessment of Appeal Scheme

- 10.2.1 The appeal site lies outside current settlement boundaries as set out in the Adopted Local Plan. The appeal 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.

- 10.2.2 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 appeal site. The clear intension of both Authorities is to maintain the gap and maintain the separate identities of the two settlements.

- 10.2.3 The proposed development also encroaches on the setting of 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, which include 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.

- 10.2.4 The SDNP View characterisation and analysis 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).

10.2.5 The proposed development is located centrally in key viewpoint 31 as illustrated in the report, and the scale and extent of the development would be highly visible and 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.

10.2.6 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.

10.3 Conclusion

10.3.1 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 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.