

APPENDIX 12

Goring Gap Proposed Local Green Space Designations – June 2018

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GORING GAP PROPOSED LOCAL GREEN SPACE DESIGNATIONS

Landscape Statement

by

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on behalf of

Worthing Borough Council

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1 INTRODUCTION

1.1 Background

1.1.1 The Government introduced Local Green Space designations in its 2012 National Planning Policy Framework (NPPF). The designation is intended to protect green spaces which are of particular importance to local communities. Applications for Local Green Space designations have been made for the Goring Gap, including Chatsmore Farm to the north and the Goring-Ferring Gap site to the south. The applications are being considered by Worthing Borough Council through its Local Plan process.

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

1.2 The Goring Gap

1.2.1 The Goring Gap consists of two areas to the west of the Worthing conurbation (see plan HDA 1). The northern area, associated with Chatsmore Farm, is located to the north of the 'West Coastway' railway line, and consists of a large arable field subdivided by Ferring Rife within the Borough of Worthing, along with a smaller arable field adjacent to the south-west which is located within Arun District. The field within Worthing measures approximately 28ha, and the smaller field in Arun is approximately 2ha in area.

1.2.2 The southern area, referred to as the Goring-Ferring Gap, is located on the coast, and consists mainly of an arable field along with some smaller parcels of land used for formal and informal recreation, including Fernhurst recreation ground and Goring Hall recreation ground. The arable fields are sub-divided by a loop of roads which were laid down in the 1930s with the intension of serving housing which was never built. The eastern portion of the Goring-Ferring Gap is located within Worthing Borough, while the western portion is within Arun District. The area within Worthing measures approximately 33ha, and the area within Arun is approximately 29ha.

1.2.3 Before the 20th century, Goring-by-Sea and Ferring were two small nucleated settlements located some distance from each other. By the 1960s, the two settlements had grown to form the majority of their current extent, with the current gap preserving the separate identities of Goring and Ferring. In the early 1960s an application was made for development at 'Land North of Marine Drive, Goring-by-Sea' within the Goring-Ferring Gap. Following a public inquiry, an appeal for housing on the site was dismissed by the Ministry of Housing and Local Government in May 1963. 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. The Goring Gap has remained undeveloped ever since.

1.3 Gap Policy

1.3.1 Until relatively recently, the whole Goring Gap was afforded protection from development through its designation as a 'Strategic Gap', the purpose of which was to prevent coalescence between settlements. Both parts of the Goring Gap are surrounded by housing on three sides and form the remaining separation between Worthing and Ferring, with the southern portion maintaining an undeveloped coastline between the two settlements. The importance of the whole Gap 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 extended northwards to include the fields at the foot of Highdown Hill.

1.3.2 Since the adoption of the Core Strategy in 2011, the Strategic Gap policy no longer exists in Worthing Borough, 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. Policy 13 states 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.
- All new development will respect the biodiversity and natural environment that surrounds the development and will contribute to the protection and, where applicable the enhancement of the area. New development along the seafront will be designed to

incorporate measures which will limit any adverse impacts on the coastal and marine environment.”

1.3.3 Although the NPPF, introduced in 2012, does not provide the strategic gap ‘policy hook’ that county Structure Plans had under the previous planning system, a number of Local Plans have nevertheless designated Local Gaps. The emerging Local Plan of Arun District, which borders Worthing Borough to the west, proposes a number Local Gaps in relation to its Policy SD SP3, including the western portion of the Goring Gap sites which falls within Arun District. A final inspector’s report on the proposed Arun Local plan is due in July 2018, however limited modifications have been made to the proposed policy to date. Incorporating proposed and addition modifications, Policy SD SP3 currently sets out that development will only be permitted within gaps if:

- It would not undermine the physical and/or visual separation of settlements;
- It would not compromise the integrity of the gap, either individually or cumulatively with other existing or proposed development;
- It cannot be located elsewhere;
- It maintains the character of the undeveloped coast and;
- If a subsequent DPD or Neighbourhood Plan deems it appropriate through an allocation.

1.4 **Local Green Space designations**

National Planning Policy Framework

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

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

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

- 1.4.3 Once an area has been designated as a Local Green Space, it would have protection consistent with areas of Green Belt. Paragraph 78 of the NPPF states that “Local policy for managing development within a Local Green Space should be consistent with Green Belt policy”. Green Belt policy is intended to prevent urban sprawl by keeping land permanently open, and any development within the Green Belt should only be permitted in very special circumstances.

Planning Practice Guidance

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

- 1.4.5 Paragraph 006 of the PPG explains that the Local Green Space designation is for use in Local Plans or Neighbourhood Plans to designate green areas for special protection. It adds that “Anyone who wants an area to be designated as Local Green Space should contact the local planning authority about the contents of its local plan or get involved in neighbourhood planning”. Paragraph 009 states that “Local Green Spaces may be designated where those spaces are demonstrably special to the local community, whether in a village or in a neighbourhood in a town or city”. Paragraph 008 explains that “Local Green Space designation will rarely be appropriate where the land has planning permission for development. Exceptions could be where the development would be compatible with the reasons for designation or where planning permission is no longer capable of being implemented”.

Relationship to other designations

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

Ownership and management

- 1.4.7 Land covered by a Local Green Space can be publicly or privately owned. Paragraph 019 of the PPG states that where land to be designated is privately owned, the local planning authority (in the case of local plan making) should contact landowners at an early stage

about proposals to designate any part of their land as Local Green Space. Landowners will have opportunities to make representations in respect of proposals in a draft plan.

- 1.4.8 Management of land designated as Local Green Space will remain the responsibility of its owner. Paragraph 020 of the PPG comments that “designating a green area as Local Green Space would give it protection consistent with that in respect of Green Belt, but otherwise there are no new restrictions or obligations on landowners”. Paragraph 021 adds that “if the features that make a green area special and locally significant are to be conserved, how it will be managed in the future is likely to be an important consideration. Local communities can consider how, with the landowner’s agreement, they might be able to get involved, perhaps in partnership with interested organisations that can provide advice or resources”. The guidance also notes that Local Green Spaces could be nominated for listing by the local authority as an Asset of Community Value.

Suitability

- 1.4.9 The Government’s ‘Open space, sports and recreation facilities, public rights of way and local green space’ PPG expands on the criteria set out at paragraph 77 of the NPPF, and gives some further advice on the suitability of green spaces for designation as Local Green Spaces.
- 1.4.10 The guidance notes that while the green space will need to meet the NPPF criteria, whether to designate land is a matter for local discretion, and adds that green areas could include spaces which provide a tranquil oasis within an otherwise urban area. The PPG comments that the proximity of a Local Green Space to the community it serves will depend on local circumstances, but in most cases should be within walking distance.
- 1.4.11 Paragraph 015 of the guidance states that “There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgment will inevitably be needed”. However, blanket designations of countryside would not be appropriate, and should not be used as an alternative to Green Belt policy.
- 1.4.12 The level of public access to an area does not affect its suitability for designation as a Local Green Space. Paragraph 017 explains that some suitable areas may have unrestricted access, or be crossed by public rights of way (paragraph 018). Other areas may have no public access, but could still be appropriate for designation due to their wildlife, historic or beauty value.

Designation precedence

- 1.4.13 A number of Local Green Space designations have been proposed through the local plan process of other authorities, and in general have been successfully designated. Similar to

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

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

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

Local Green Space designations in practice

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

1.4.17 The Open space, sports and recreation facilities, public rights of way and local green space PPG, sets out that representations in respect to Local Green Space designations can be

made at the time of a draft local plan (or neighbourhood plan) in which the designation is included. This implies that the designation could be reassessed or challenged as part of the process for preparing subsequent plans, in a similar way to the review of Green Belt boundaries as part of local plan review.

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

1.4.19 Persimmon Homes also challenged the Local Green Space designations proposed as part of the North Somerset policy framework. The Inspector's Report on the Examination of the North Somerset Sites and Polices Plan Part 2: Site Allocations Plan sets out that although there were a significant number of Local Green Space designations proposed, they majority meet the national criteria. However, two sites were rejected. One site at Brookfield Walk is within an area of Green Belt and it was considered that a Local Green Space designation did not offer appropriate additional protection, and the second site at May Day Field was considered not to be demonstrably special to the local community.

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

2 RELEVANT LOCAL LANDSCAPE EVIDENCE

2.1 Introduction

2.1.1 A number of local groups and interest parties have prepared evidence related to the suitability of both parts of the Goring Gap for Local Green Space designations. Relevant evidence from local groups is reviewed below. Additionally, an Open Space Assessment, and the Issues and Options Consultation, which are part of the evidence base for the Worthing Local Plan, are also set out below.

2.2 The Goring Residents' Association

2.2.1 The Residents' Association, with the support of others, has prepared various information in support of its request for Local Green Space designations, and sets out what it believes are the special qualities of the two sites which are appreciated by the local community. These include the views north and south from both parts of the Gap, the importance of the

area as a 'tranquil' open space between Goring and Ferring, and the types of recreation undertaken within the each part of the Gap.

2.2.2 The residents association's 'Local Green Space Report' (see Appenidx A) provides detailed information on the historical significance of local features, including Highdown Hill, Highdown Gardens, Goring Hall, The Ilex Avenue and The Plantation. Highdown Hill and the gardens are not within the Goring Gap, but form an important part of the view and setting to both parts of the Goring Gap. Goring Hall is located adjacent to the north-east corner of the Goring-Ferring Gap site, with the Gap providing the immediate setting to the grade II listed building. The building can be glimpsed from the seafront, across the open Goring-Ferring site. The Ilex Avenue and The Plantation, form the robust northern and eastern edges of the Goring-Ferring Gap, and are an integral part of the character of the green space. The Ilex Avenue was planted in the 19th century to line a driveway to Goring Hall, and The Plantation was laid out at a similar time to connect Goring Hall to the sea via a wooded walkway.

2.3 Ferring Conservation Group

2.3.1 In letters to Worthing Borough Council dated 2014, the chairman of Ferring Conservation Group identifies the importance of both parts of the Goring Gap, including how they provide a break in the built-up area, and are valuable recreational resources. The letters also highlight the visual importance of the Gap, including the function of the northern area as a setting to the South Downs National Park, in particular Highdown Hill, and the unique view from the beach across the southern area towards Ilex Avenue and Highdown Hill and the National Park beyond.

2.4 Ferring Parish Council

2.4.1 In a statement regarding the potential Local Green Space application, the Chairman of the Ferring Parish Council refers to a village survey carried out in 2012. The survey showed that "a huge majority of Ferring residents values the green gaps as a recreational resource and wildlife amenity". The Chairman also notes the importance of the two areas as green open space between Worthing and Ferring. Appendix B includes results from the 'Environment, Amenities & Leisure' section of the survey. Issues were scored on a scale of 1 to 5, with 1 being not important and 5 being very important. 88.2% of survey respondents gave a score of 5 for protecting both parts of the Goring Gap as open space. Over 50% of respondents gave a score of 4 or 5 for improving the quality of rights of ways and pathways.

2.5 Ward Councillors

2.5.1 In 2014, the councillors for the Goring and Castle Wards wrote to Worthing Borough Council in support of a Goring Gap Local Green Space designation (see Appendix C). The

letter highlights the important function of the area as a gap of open space in the wider conurbation along the south coast.

2.6 Goring-Ferring Gap Bird Survey

2.6.1 A comprehensive survey by the Shoreham and District Ornithological Society, last updated in March 2014, records a total of 194 bird species witnessed in the southern Goring-Ferring Gap site. The Society comments that the importance of the Goring-Ferring Gap site for birds cannot be over emphasised, stating that the site "...forms a key site for wintering waders and gulls, together with occasional Brent Geese and in spring and autumn, terns, as they roost on the fields at high tide – their only refuge from an increasing public presence with its associated other recreational interests. Last winter nationally significant numbers of waders totalling over 1000 birds used the partially flooded fields in this manner. No other location of similar size and geography exists along the Sussex coast between Newhaven and Littlehampton".

2.6.2 The Society adds that the Goring-Ferring Gap site is also an important route for migrating birds, both on the ground and in the air above it. Trees within and adjacent to the site, including the plantation along the eastern boundary, are especially significant to migrating birds. The survey states that development of dwellings on the site would have a detrimental effect on birds.

2.6.3 The Gap, in particular the Goring-Ferring Gap site to the south, is therefore likely to be of district ecological importance for bird interest.

2.7 Sussex Biodiversity Record Centre

2.7.1 The Sussex Biodiversity Record Centre holds extensive data for species recorded within both of the Goring Gap sites, including a number of European Protected Species, and Biodiversity Action Plan priority species. Records include several species of bats and a significant number of bird species.

2.8 Astronomical groups

2.8.1 There are several astronomical groups based in the Worthing area, including the Worthing Astronomical Society, and the Worthing Astronomers and Skywatchers. The Goring-Ferring Gap site to the south is used for observation sessions by astronomical groups due to the dark skies above the site away from street lights or generally light pollution associated with settlement.

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

2.9.1 In 2014, an Open Space Standards Paper was prepared on behalf of Adur and Worthing Councils, as part of a wider Open Space, Playing Pitch and Indoor Sports Study, to inform its Local Plan. The study assesses the amount of open space provision within Worthing,

against target standards to determine whether there is a surplus or deficiency of different types of open space within the Borough. Table 10.5 (see Appendix D) identifies that there is a total of 268.403ha of natural and semi-natural greenspace in the Borough, and 81.329ha of amenity greenspace. Table 10.6 (see Appendix D) compares these figures for existing provision to provision targets. Both natural/semi-natural greenspace, and amenity greenspace, are below the target figures, and therefore there is a deficiency of these types of Open Space within the Borough overall.

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

- The Plantation North (to the east of the Goring-Ferring Gap site) as natural/semi-natural open space with a quality score of 48% and value score of 47%.
- Goring Hall Recreation Ground as amenity green space with a quality score of 48% and value score of 27%.
- Amberley Drive (within the Goring-Ferring Gap site) as natural/semi-natural greenspace with a low quality score of 14% and value score of 32%. This is the only site in the study observed as suffering from fire damage. This is considered to be due to the sites isolated location away from natural surveillance. However it is noted to be popular with dog walkers.
- Fernhurst Recreation Ground (to the north-east of the Goring-Ferring Gap site) as amenity green space with a quality score of 65% and value score of 54%.
- Fernhurst Drive (also known as Ilex Way, along the northern edge of the Goring-Ferring Gap site) as natural/semi-natural greenspace with a high quality score of 70% and value score of 56% observed as being attractive well maintained, and particularly popular.

2.10 Issues and Options Consultation

2.10.1 The Issues and Options (I&O) stage of the next Worthing Local Plan for Worthing involved consultation undertaken in May and June 2016. Responses to the I&O consultation are set out in a Summary of Representations, which should be read in conjunction with an I&O Consultation Report dated August 2016.

2.10.2 The Summary of Representations records that 183 respondents (70% of the total 261 people/groups who responded to the I&O consultation), raised strong concerns about potential development of both parts of the Goring Gap. The overwhelming view of respondents was that the Goring Gap is valued in its entirety. The vast majority of respondents referred to both parts of the gap in combination, without differentiating between the Goring-Ferring Gap site and Chatsmore Farm.

- 2.10.3 The consultation responses from 173 people/groups commented on the need for protection of the Goring Gap sites, with reasons including protection from development to retain the open space for local people and future generations. Various means of protection were suggested for the Goring Gap, including designation as a Local Green Space.
- 2.10.4 143 respondents commented on landscape character, frequently stating that the Goring Gap has a very high landscape value. Respondents highlighted that the sites provide a unique setting between the sea and the South Downs National Park, and that the uninterrupted views are highly valued to and from the Gap, including where the countryside meets the sea. The South Downs National Park Authority (SDNPA) commented that development at Chatsmore Farm would likely have a significant impact on views to and from the National Park, including from Highdown Hill, and highlighted that both parts of the Goring Gap form an important break in development along the coast.
- 2.10.5 113 responses included strong concerns about the impact development within the Goring Gap would have on wildlife and biodiversity, in particular with regards to birdlife and how the sites provide an ideal habitat for roosting and migration. Other wildlife and nature features were also referred to, including the line of Holm Oak trees known as Ilex Avenue along the northern boundary of the Goring-Ferring Gap site.
- 2.10.6 Comments from 92 respondents included concern about the impact development would have on the existing settlement pattern and the individual identities of settlement in the area. Respondents highlighted the need to avoid coalescence of settlements, prevent urban sprawl and protect the historic gap.
- 2.10.7 43 respondents commented on how the Goring Gap sites are valued by users, including local residents, visitors and tourists, for activities such as walking, dog exercising and bird watching. A number referred to the physical and mental health benefits of the Goring Gap sites, with reference to the 'green lungs' and 'breathing spaces'. Concerns regarding the potential loss of the sports pitches within the Goring-Ferring Gap site to the south were also raised by several respondents.
- 2.10.8 Significant numbers of respondents raised a number of other concerns, including 87 respondents who were concerned about the loss of grade 1 agricultural land, 76 respondents were concerned about flooding issues, and 40 respondents highlighted that the Goring Gap sites provide a highly valued natural area/rural environment which is highly accessible from the adjacent urban areas.

3 WORTHING LANDSCAPE AND ECOLOGY STUDY (2015 & 2017)

3.1 Introduction

3.1.1 The site specific Worthing Landscape and Ecology Study prepared by HDA in 2015, and updated in 2017, considered the landscape and ecology suitability of sites for development within the Borough, including the two sites which form the Goring Gap. The two areas were assessed against various landscape considerations, including their local landscape context, landscape structure, landscape character, settlement pattern and visibility. This analysis fed into tabulated sensitivity and value assessments, which when combined, using an inverse matrix, resulted in an overall suitability rating. The study then recommended potential green infrastructure proposals for the two areas.

3.1.2 The analysis and assessment contained within the Landscape and Ecology Study demonstrated the special qualities of both parts of the Gap which are valued by the local community, including considerations noted in the NPPF criteria, such as its scenic beauty, historic significance, recreational value, and tranquillity. The two parts of the Gap were considered as separate sites, and the analysis contained within the assessment formed the basis of the following descriptions of the landscape qualities of the Gap.

3.2 Northern gap area – Chatsmore Farm site

(See plan HDA2)

Landscape Structure

3.2.1 The northern gap area is adjacent to the southern edge of the South Downs National Park. The area is flat, underlain by chalk with superficial sand and gravel deposits. The northern gap consists of two large arable fields, separated by Ferring Rife which flows east to west through the northern half of the site. A line of pylons also runs east-west through the middle of the site.

3.2.2 The northern gap is bounded by broken vegetation of varying density including bushes and occasional small tree groups, within or adjacent to the site's southern, eastern and western boundaries. Ferring Rife has limited riparian vegetation, which includes occasional shrubs/small trees. The site is surrounded by existing development to the south, east and west, including 3 storey buildings to the north-east and multi-storey flats to the south-east. The A259 forms the northern boundary. The railway line runs along the southern edge of the gap. Footpath 2121 also runs along the southern boundary, and footpath 2121/1 runs along part of the western boundary.

Landscape Character

3.2.3 The northern gap area is located in the low lying flat open landscape of the 'Littlehampton and Worthing Fringes' county character area (area SC11), of the West Sussex Landscape Character Assessment (see figure 6 of the Worthing Landscape and Ecology Study). The

accompanying land management guidelines for area SC11 recommend restoring and strengthening the landscape, and include:

- Create a new large scale tree and hedgerow framework to complement the open, intensively farmed landscape, whilst maintaining important views.
- Maintain and enhance the landscape and biodiversity of rifes and other existing wetland habitats such as salt marsh, mud flats and water meadows.
- Encourage conservation and community involvement in urban spaces and village greens.

3.2.4 At a local scale, the northern gap area is part of the 'Goring Coastal Plain' local landscape character area identified by HDA as mapped on figure 7 of the Worthing Landscape and Ecology Study. This area is characterised by open large scale arable fields which continue to the north and west beyond the A259 road.

Settlement Pattern and Gap Function

3.2.5 Prior to the 20th century, Goring-by-Sea and Ferring were small nucleated settlements some distance from the site. During the 1950s, Goring Way was lined with houses, establishing a linear link of settlement between Goring-by-Sea and Ferring, about 200m to the south of the site. During the 1960s, much of the current housing to the east and west was in place, with housing in Ferring reaching level with the northern edge of the northern gap, and housing reaching north from Goring Way to the railway along the southern edge of the gap. The full extent of housing which borders the site to the east was reached during the 1980s, and multi-storey buildings have recently been constructed to the south-east of the northern gap on the opposite side of the railway. However, an open area remains adjacent to the south, beyond the railway as school playing fields.

3.2.6 Worthing has also spread north towards West Durrington, but no substantial development has taken place immediately north of the gap within the vicinity of Highdown Hill. The site remains as a continuation of the open landscape to the north, separating the northern settlement patterns of Worthing and Ferring when viewed from the National Park to the north. If the northern gap is developed in its entirety, the areas of settlement to the east and west would coalesce.

Visual Assessment

3.2.7 The northern gap is open to view from Highdown Hill and its hill fort within the South Downs National Park to the north, and forms a prominent part of the middle distance within the view (see photograph A). The gap is seen in context with existing settlement on three sides and the English Channel on the horizon, and forms an effective gap in the view of development along the coastal plain. The view of open space continues in part south of the railway line into the school playing fields to the south-east of the northern gap.

3.2.8 The northern gap is also visible from high ground within the National Park, to the east of High Salvington (see photograph B), and at a greater distance from Cissbury Ring, which is a Scheduled Ancient Monument hill fort within the National Park to the north of Worthing.

3.2.9 At closer range, the northern gap is open to view from footpaths 2121 and 2121/1, from the A259 (see photograph C), and although partially filtered by vegetation in places, is visible from properties and railway passengers which face onto the area. The northern gap forms effective separation between Goring and Ferring when travelling along the A259 road. There are uninterrupted views to the National Park, including Highdown Hill from public footpath 2121 along the southern edge of the gap (see photograph D).

3.2.10 The Landscape and Ecology Study judged the majority of the northern gap to have a 'Major' degree of visual sensitivity. A small part of the south-west corner of the northern gap, where it adjoins with Arun District to the west, is partially contained to the north by vegetation, and forms a less prominent part of the visual separation between Goring and Ferring than the majority of the northern gap. The south-west corner of the northern gap was therefore considered to have 'Moderate' visual sensitivity.

Sensitivity

3.2.11 The Landscape and Ecology Study takes the visual sensitivity of the northern gap area and combines it with consideration of other criteria as follows to determine an overall sensitivity of the area:

- Inherent landscape quality (intactness and condition)
- Ecological sensitivity
- Inconsistency with existing settlement form/pattern
- Contribution to separation between settlements
- Contribution to the setting of surrounding landscape/settlement
- Views (visual sensitivity)
- Potential for mitigation

3.2.12 As well as having a high visual sensitivity, the northern gap area was judged to have particularly high sensitivity in terms of its function as open space between the settlements of Goring and Ferring. The gap was judged to have substantial sensitivity in relation to its contribution to the setting of the surrounding landscape and settlement, due to the areas function as an open aspect in an otherwise developed coastal plain, and its connection to the South Downs National Park. Ferring Rife, with its corridor of semi-natural habitats and wider connectivity, contributes to the area having a substantial ecological value. The area was also considered to have substantial sensitivity in terms of the potential for mitigation due to the difficulty to mitigate against the effects development within the gap would have

upon the other criteria within the assessment, most notably the adverse effect on the separation between settlements.

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

Value

- 3.2.14 The Landscape and Ecology Study also determines the landscape value of the northern gap by combining consideration of the following criteria:

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

- 3.2.15 Located adjacent to the South Downs National Park, the northern gap was considered to have substantial landscape value. The areas openness as one of the few undeveloped gaps in settlement along the coastal plain, and its visual connectivity with Highdown Hill and the National Park, results in the gap having substantial value in terms of local distinctiveness and the sites contribution to the setting of 'outstanding assets'. The area is also considered to have substantial recreational value due to the public footpaths across the gap, which have views of the National Park, and are in close proximity to Goring railway station. With regards to tranquillity and remoteness, the assessment noted that the northern gap provides a relief to the surrounding built up areas.

- 3.2.16 Overall, taking into account all of the above criteria, the value of the northern gap area was considered to be 'Substantial'. The substantial sensitivity and value of the gap resulted in the Landscape and Ecology Study concluding that the majority of the northern gap area is unsuitable for development without a significant and detrimental effect on the character of the landscape as a whole, the separation between settlements, and the setting to the South Downs National Park and existing settlement.

Green Infrastructure

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

- Maintain undeveloped landscape as part of the open space between Goring-by-Sea and Ferring, and break in settlement when viewed from the north, particularly the area defined by the dashed line on plan (page 54 of Landscape and Ecology Study report).

- Enhance riparian vegetation along Ferring Rife, without effecting openness of the main views.
- Protect public rights of way, including link to Goring-by-Sea railway station.
- Strengthen boundary vegetation, in particular along the A259 road, without damaging the main open view.

3.3 Southern gap area – Ferring-Goring Gap site

(See plan HDA3)

Landscape Structure

3.3.1 The majority of the southern gap is formed by a large open area between Ferring and Goring, consisting of flat arable fields and some smaller areas of rough grassland, underlain by chalk with superficial deposits of sand and gravel.

3.3.2 There is limited tree cover internally, but the area is bordered by a significant belt of woodland plantation to the south-east, a small woodland block and length of hedgerow along the eastern boundary, and a distinctive avenue of evergreen Oak trees along Ilex Way adjacent to the north. The southern boundary is defined by Marine Drive and the undeveloped coastline. Amberley Drive forms a loop of roads in the southern part of the gap.

3.3.3 Within the north-eastern part of the area are two fields, also underlain by chalk with superficial deposits of sand and gravel. The eastern field is mown grass used for recreation, including goal posts for football, and the western field is arable. The boundaries are well vegetated, with the exception of the southern boundary to the arable field, which is defined by a field drain with limited vegetation. The western-most boundary is formed by a small block of woodland and length of outgrown hedgerow. To the east, the area abuts the northern extent of “The Plantation” along the western edge of Goring-by-Sea. Internally, the two fields are separated by a continuous outgrown hedgerow, while the northern boundary (adjoining the recreation ground to the north) has a line of tall trees and adjacent hedgerow.

Landscape Character

3.3.4 The southern gap is located in the low lying flat open landscape of the ‘Littlehampton and Worthing Fringes’ county character area (area SC11), and forms the eastern part of the ‘Ferring Lower Coastal Plain’ local landscape character area. Although a working agricultural landscape, there is also a strong sense of public amenity with high public usage including walking along informal routes across the area, car parking along roads, and picnicking to the south along the coastline.

Settlement Pattern

3.3.5 Prior to the 20th century, Goring-by-Sea and Ferring were small nucleated settlements some distance from the site. By the 1940s, Ferring had spread south and begun to extend eastwards as far as Sea Lane as it does to this day. By the 1950s, the majority of the road network to the south-west of Goring-by-Sea, including roads within the site, were in place. During the 1950s, Goring Way was lined with houses, establishing a linear link of settlement between Goring-by-Sea and Ferring, about 250m to the north of the site. During the 1960s, much of the current extent of housing was in place, with Goring-by-Sea expanding to form an extension of Worthing, and housing spreading north and south from Goring Way between Goring and Ferring, increasing the connection between the two settlements.

3.3.6 However, despite the continual growth of the two settlements, the spread of development westwards along the coast from Goring-by-Sea has halted at the robust settlement edge formed by 'The Plantation', which has been in place since before the 20th century. Similarly, to the north of the southern gap, development south has not gone beyond the historic avenue of Oak trees which forms the northern boundary of the southern gap. Together with land within Arun District, the site is one of few remaining sections of undeveloped coast along the coastline locally, providing open space and recreational opportunity to the adjacent settlement, and maintains a rural character with little or no development present or visible in the gap.

Visual Assessment

3.3.7 The southern gap provides a visual connection, uninterrupted by development, between the undeveloped coastline and the South Downs National Park, including Highdown Hill, to the north. From within the gap (see photograph E) and from the shoreline, the substantial Oak avenue along Ilex Way obscures existing settlement to the north, while 'The Plantation' screens development to the east.

3.3.8 The area is open to view from the South Downs National Park, including Highdown Hill to the north-west (see photograph F). The southern gap is seen in context with surrounding settlements of Goring-by-Sea and Ferring on the coastal plain, but also the undeveloped coastline and English Channel on the horizon, and forms a significant break in the view of development along the coastline.

3.3.9 The Landscape and Ecology Study judged the majority of the southern gap to have a 'Major' degree of visual sensitivity. The two smaller fields to the north-east, are enclosed by boundary vegetation, and although are identifiable from the National Park, they form a small part of the overall view. These two fields were therefore considered to have 'Substantial' visual sensitivity.

Sensitivity

3.3.10 The Landscape and Ecology Study takes the visual sensitivity of the southern gap area and combines it with consideration of other criteria as follows to determine an overall sensitivity of the area:

- Inherent landscape quality (intactness and condition)
- Ecological sensitivity
- Inconsistency with existing settlement form/pattern
- Contribution to separation between settlements
- Contribution to the setting of surrounding landscape/settlement
- Views (visual sensitivity)
- Potential for mitigation

3.3.11 As well as having a high visual sensitivity, the southern gap area was judged to have particularly high sensitivity in terms of its contribution to the open space between the settlements of Goring and Ferring, and its contribution to the setting of surrounding landscape/settlement, including the southern gaps contribution to the rurality and undeveloped character of the coastline. The southern gap has substantial sensitivity in relation to its inconsistency with the existing settlement pattern, as development within the gap would breach the long established woodland edge to Goring. The area was also considered to have substantial sensitivity in terms of the potential for mitigation, due to the difficulty to mitigate against the effects development within the gap would have upon the other criteria within the assessment, most notably the adverse effect on the separation between settlements.

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

Value

3.3.13 The Landscape and Ecology Study also determines the landscape value of the southern gap by combining consideration of the following criteria:

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

3.3.14 The areas openness as one of the few undeveloped gaps in settlement along the coastal plain, its wooded edges which obscure the settlement edges, and its visual connectivity with the coastline and Highdown Hill, results in the gap having highly significant value in terms of local distinctiveness and the sites contribution to the setting of 'outstanding assets'. The area is also considered to have high recreational value due to considerable public use, from local dog walkers to those who have travelled from further afield to appreciate the section of undeveloped coastline and views north to the National Park. With regards to tranquillity and remoteness, the assessment noted that southern gap provides a relief to the surrounding built up areas.

3.3.15 Overall, taking into account all of the above criteria, the value of the southern gap area was considered to be 'Substantial'. The major sensitivity and substantial value of the gap resulted in the Landscape and Ecology Study concluding that the majority of the southern gap area is unsuitable for development without a significant and detrimental effect on the character of the landscape as a whole, the separation between settlements, and the setting to the South Downs National Park and the undeveloped coastline.

Green Infrastructure

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

- Maintain undeveloped landscape as part of effective separate between Goring-by-Sea and Ferring, maintaining visual link uninterrupted by development between the coastline and the South Downs National Park.
- Maintain and enhance internal boundary hedges and trees to the two north-eastern fields, whilst maintaining open visual dimension across the majority of the gap.
- Protect the boundary to The Plantation to the east.
- Protect the boundary to the Oak avenue to the north.

4 LOCAL GREEN SPACE DESIGNATION SUITABILITY

4.1 Introduction

4.1.1 The suitability of an area for designation as a Local Green Space is primarily judged against the three main criteria outlined in the NPPF, and supported by The Government's 'Open space, sports and recreation facilities, public rights of way and local green space' guidance. The following section considers the two sites which form the Goring Gap against each of the main criteria, incorporating the evidence and assessments described in sections 2 and 3 above as appropriate.

4.2 Proximity to the community

4.2.1 The first part of the NPPF Local Green Space criteria states that the Local Green Space designation should only be used where the green space is in reasonably close proximity

to the community it serves. Both parts of the Goring Gap meet this criteria, being adjacent to, and surrounded by, a significant conurbation along the coastal plain.

4.2.2 The Gap sites abut Goring-by-Sea, a suburb of Worthing, to the east of the Goring Gap sites, and abut the settlement of Ferring, located within Arun District, to the west of the Gap. Both parts of the Goring Gap are well used by the adjoining local communities, for recreation including walking, dog exercising and bird watching. The Goring-Ferring Gap site to the south is also used for astronomical observation, as set out in the evidence section above, including evidence from the Goring Residents' Association, Ferring Conservation Group, Ferring Parish Council, and the Issues and Options (I&O) consultation.

4.2.3 Both sites also have visitors from further afield. The seaside location and public rights of way attract day-trippers to the southern Goring-Ferring Gap site. Public rights of way across the northern Chatsmore Farm site provide footpath access from the adjacent railway station to the National Park to the north.

4.3 Special qualities and local significance

4.3.1 The second part of the NPPF criteria sets out that the designation should only be used where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife. Both of the Goring Gap sites meets all aspects of this part of the criteria, as described as follows.

Demonstrably special to local communities

4.3.2 The significant number of local groups and organisations have prepared evidence in support of a Local Green Space designation which demonstrates the importance which the Goring Gap sites have to the local communities. Information prepared by a range of groups, related to the various special qualities of the Gap, is described in section 2 above.

4.3.3 The specialness of the whole Goring Gap is also demonstrated by the comments made by local individuals/groups, as part of the I&O consultation process. 70% of the total respondents to the Borough-wide consultation expressed strong opinions about protecting the Gap in its entirety.

Local significance: beauty

4.3.4 The importance of the Goring Gap sites to the local community in terms of local beauty is highlighted by responses to the I&O consultation. 142 of the total 261 respondents commented on the high landscape value of the Goring Gap sites, including their unique

setting between adjacent the sea to the south, and the South Downs National Park nearby to the north.

4.3.5 The Worthing Landscape and Ecology Study, details the special landscape qualities of the two parts of the Goring Gap in detail, including visual amenity and perceptual aspects such as scenic beauty, which feed into the overall suitability judgements for the areas. The study identifies the high visual sensitivity of both parts of the Gap, highlighting the important visual amenity provided by the both parts of the Goring Gap.

4.3.6 Chatsmore Farm to the north, is open to view from Highdown Hill and the National Park, including distant glimpses from Cissbury Ring. In the opposite direction, there are uninterrupted views across the site towards the National Park from the public footpaths which border and cross the southern part of Chatsmore Farm.

4.3.7 The Goring-Ferring Gap site to the south, provides visual connectivity between the undeveloped coastline to the south and the National Park, including Highdown Hill, to the north. Tree cover to the north of the site, including the evergreen Oaks along the Ilex Avenue, obscures settlement to the north, allowing views from the coastline towards the National Park which are largely uninterrupted by development. The Goring-Ferring gap site is also visible from the National Park, and forms an attractive break in the view of development along the coastline.

Local significance: historic significance

4.3.8 The historical significance of the Gap is set out in evidence prepared by the Goring Residents' Association. The northern part of the Gap is associated with Highdown Hill and Highdown Gardens, which are an important part of the rural views north. The fields associated with Chatsmore Farm also form the setting to adjacent listed buildings.

4.3.9 The southern part of the Gap is bounded by The Ilex Avenue and The Plantation, which form prominent boundaries to the north and east, and are an integral part of the character of the area. These features are associated with Goring Hall which adjoins the Goring-Ferring Gap site to the north-east. The site provides the setting to the grade II listed building, and there are views across the fields between the hall and the undeveloped coastline.

4.3.10 The Gap sites themselves are valued by local communities for their historic function in preventing coalescence between Goring-by-Sea and Ferring, as demonstrated by the comments of 92 respondents to the I&O consultation in relation to settlement pattern.

Local significance: recreational value

- 4.3.11 A significant number of respondents to the I&O consultation commented on how the Goring Gap is valued for its recreational uses, both by local residents and visitors from further afield. Both parts of the Gap are well used by walkers, and people exercising dogs. The Goring-Ferring Gap site in particular, is also used for bird watching, astronomy, and includes the sports pitches within Fernhurst recreation ground, and more informal playing fields with Goring Hall recreation ground. Local residents value the Goring Gap as a 'green lung' and 'breathing space' within the wider built up area. The public footpaths across the Chatsmore Farm site connect the adjacent Goring-by-Sea railway station to the South Downs National Park to the north.
- 4.3.12 Other local evidence, such as the village survey carried out by Ferring Parish Council, demonstrates the importance of both parts of the Gap as a recreation resource to the local community. Residents are strongly in favour of retaining the open space, but also improving the quality of footpaths within the area.
- 4.3.13 The recreational value of both parts of the Goring Gap is particularly important given the deficit of natural/semi-natural greenspace and amenity greenspace in Worthing Borough as a whole, as identified in the 2014 Open Space Standards Paper prepared on behalf of Adur and Worthing Councils, and detailed in section 2 above.

Local significance: tranquillity

- 4.3.14 The NPPF addresses tranquillity at paragraph 123, stating that planning policies should aim to "identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason".
- 4.3.15 Both parts of the Gap are important to the local community as a relief from the built up conurbation along the coastal plain, particularly since there is a deficit of similar open space within the Borough as a whole. The Goring Residents Association highlights that local people view the Goring Gap as offering an area of calm and escape from the surrounding urban development. The residents association comments that there is limited noise within both parts of the Gap, which engenders a sense of well-being and calm.
- 4.3.16 Although noting some urban influence, due to nearby human influences, such as the A259 and railway line adjacent to Chatsmore Farm, the 2015 Worthing Landscape and Ecology Study considered the majority of both parts of Goring Gap to be 'moderately' valuable in terms of tranquillity in their own right.

4.3.17 Tranquillity in terms of a lack of street lights and general light pollution attracts astronomical groups to hold observation sessions on the darker skies above the Goring-Ferring Gap site to the south.

Local significance: richness of wildlife

4.3.18 The richness of the wildlife within both parts of the Goring Gap is recorded by various sources, including data compiled by the Sussex Biodiversity Record Centre and a comprehensive bird survey prepared by Shoreham and District Ornithological Society. The ecological assessment of the Gap sites contained within the 2015 & 2017 Worthing Landscape and Ecology Study, identified the majority of landscape features within the Gap as having moderate to high local ecological value, including the woodland within the Goring-Ferring Gap site to the south. The assessment identified Ferring Rife which flows through Chatsmore Farm to the north, and the corridor of semi-natural habitats associated with the rife, as a significant part of a wider habitat which has district ecological value.

4.3.19 The significance of this wildlife richness to the local community is highlighted by 113 responses to the I&O consultation which address wildlife and biodiversity within both parts of the Goring Gap.

4.4 Local in character and not an extensive tract of land

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

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

4.4.3 Although this relatively broad criterion is open to interpretation, the NPPF criteria and the size suitability of specific green spaces for designation as Local Green Spaces, have been tested through the local and neighbourhood plan process of other authorities. The adopted Havant Borough Council Local Plan includes a number of Local Green Spaces, including sites which are approximately 40ha (Queens Inclosure) and 62ha (Hollybank Woods).

Areas within Havant which were considered too extensive for designation as Local Green Spaces include Hayling Beach, which stretches approximately 3 miles in length. Applications to the Cheltenham Borough Local Plan for Local Green Space designations include sites of approximately 46ha (Leckhampton Fields) and 48ha (Swindon Village Fields).

- 4.4.4 Both parts of the Goring Gap are locally distinctive areas of open space adjacent to the surrounding conurbation, yet with visual connectivity to the undeveloped coastline to the south and the National Park to the north. Chatsmore Farm measures approximately 30ha in area, and the Goring-Ferring Gap site is approximately 62ha, however there is precedence for larger sites being designated through the local plan processes of other areas and authorities. These include the 62ha site at Hollybank Woods in Havant, and sites identified for the Cheltenham Borough Local Plan which include sites of approximately 46ha and 48ha. The government guidance does not state a maximum size, “because places are different and a degree of judgment will inevitably be needed” and explains that “...blanket designation of open countryside adjacent to settlements will not be appropriate”. Therefore the size of individual applications need to be considered in their local context.
- 4.4.5 A larger area does not necessarily translate into an ‘extensive tract’ of land. For example, Humpty Hill which measures 5.6ha was recommended for deletion from the Faringdon Neighbourhood Plan at Examination as it was considered to be an extensive tract of land by the Examiner. However larger sites, including Fontwell Meadows which measures 9.75ha, and Tupper’s Field which measures 11.2ha, were accepted by the Examiner of the Walberton Neighbourhood Plan as appropriate for Local Green Space designation and not extensive tracts of land given their context.
- 4.4.6 The Examiner of the Walberton Neighbourhood Plan states that “There does not appear to be any direct legal authority on the definition of an “extensive tract of land”. The word “extensive” is defined in the Oxford Dictionary as “having a wide extent”. Other attributable meanings are “uncircumscribed”, “expanse”, “unlimited space”. In planning terms the phrase “extensive tract” is usually used in connection with land to be designated as national parks. In my judgment it is apparent from the planning perspective that the definition of an extensive tract of land means large areas of the countryside.”
- 4.4.7 In rejecting the smaller Humpty Hill site, the Examiner of the Faringdon Neighbourhood plan states that “The Guidance is very clear that ‘there are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgement will inevitably be needed’. On this basis it would be inappropriate to take an

examiner's judgement on proposed local green spaces elsewhere as a definitive guide on the extent to which Humpty Hill is or is not an extensive tract of land."

- 4.4.8 Given the extent of the settlement along the coastal plain which the Goring Gap serves, and the distance between Goring and Ferring required for the Gap to function as effective open space between the two settlements, the Goring Gap sites would be appropriate, meaningful sizes for a Local Green Space in this context. Both parts of the Gap are self-contained parcels of land with clearly defined edges, rather than extensive tracts of open, and undefined landscape.

5 CONCLUSION

- 5.1 As settlement within the Borough of Worthing, and adjoining Arun District has grown over time, the Goring-Ferring site and Chatsmore Farm site, which together form the Goring Gap, have remained as open space and become increasingly important as surrounding development increased.
- 5.2 The two sites which make up the Goring Gap were designated as a 'Strategic Gap' until the adoption of the Worthing Core Strategy in 2011. Despite no inclusion of national gap policy within the NPPF, local authorities have however continued to successfully create Local Gap Policies. Neighbouring Arun District is in the late stages of finalising Local Gaps through its own Local Plan process, including the western portion of the Goring-Ferring Gap which falls within its boundary.
- 5.3 The Government's 'Open space, sports and recreation facilities, public rights of way and local green space' PPG explains that one open space designation does not preclude another one on the same area, provided additional local benefit would be gained from the designation.
- 5.4 Local Gap policy, as tested through Arun's Local Plan process, is intended to prevent coalescence between settlements, and permits development which 'would not undermine the physical and/or visual separation of settlements' or 'compromise the integrity of the gap'. Local Green Spaces are designated to protect the special qualities of spaces which are important to local communities, such as their beauty, historic significance or recreational value, and rule out development other than in very special circumstances. Land uses permitted within a Local Gap which could be considered to conserve the openness of the gap, for example a solar farm, would not be suitable in Local Green Spaces important for qualities such as recreation and landscape qualities of the land.

- 5.5 Therefore if Worthing was to pursue a Local Gap policy for the Goring Gap sites, consistent with the approach of neighbouring Arun, this could complement a Local Green Space designation on the Goring Gap sites.
- 5.6 The NPPF sets out that adjoining local authorities have a duty to plan strategically across local boundaries, stating that “Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination”. However, it is also feasible that if the portions of the Goring Gap sites within Worthing Borough are designated as Local Green Spaces, the portions of the Goring Gap within Arun could become Local Gaps instead of Local Green Spaces. In this event, the overall effect would be to maintain the degree of openness across the Goring Gap sites, however limited development appropriate to each designation could occur either side of the local authority boundary.
- 5.7 As set out in this report, both parts of the Goring Gap meet all the NPPF criteria for Local Green Spaces. Firstly, both parts of the Gap are adjacent to the community they serve. Secondly, they are demonstrably special to the local community and hold particular local significance for not just one, but all, of the examples provided in the NPPF criteria. Lastly, both sites which form the Gap are well-defined parcels of land and are not extensive tracts or simply blankets of unremarkable open countryside.
- 5.8 Both parts of the Goring Gap exhibit considerable special landscape qualities and are significant for their function in providing an open rural landscape, serving the adjacent local communities. A variety of local groups and organisations, including the Goring Residents’ Association, the Ferring Conservation Group, Ferring Parish Council, and Ward Councillors, and responses to the Issues and Options Consultation, identify how the qualities of the Goring Gap hold a particular significance to the local communities, in an area recognised as deficient in natural/semi-natural greenspace and amenity greenspace.
- 5.9 The northern area, associated with Chatsmore Farm, provides an open undeveloped landscape which serves both Goring and Ferring. The site is particularly significant as the immediate southern setting to the National Park, with public footpath routes across the site which have views to Highdown Hill. Through the middle of the site, Ferring Rife has wildlife significance in both its own right and as part of a wider habitat connectivity.
- 5.10 The southern, Goring-Ferring Gap site is one of the few remaining stretches of undeveloped coastline within the locality and is widely used by the public for recreation. The site provides an undeveloped setting to the coastline, and despite being surrounded by settlement, is buffered from development by adjacent woodland and tree cover, allowing

visual connection between the coastal plain and the South Downs National Park, uninterrupted by views of development.

- 5.11 In conclusion, both parts of Goring Gap, consisting of the fields at Chatsmore Farm, and the Goring-Ferring Gap, fully meet the criteria and are suitable for designation as a Local Green Spaces, and if designated could complement other potential open space designations or local gap policies on the sites. Worthing Council should use the information set out above to inform its new Local Plan, and in combination with other evidence, determine the most appropriate designating or use of the Goring Gap.