

**LAND NORTH WEST OF GORING STATION, GORING-BY-SEA, WORTHING  
(REDETERMINATION)**

**Landscape Proof of Evidence of**

**Christine Marsh – BA(Hons), Dip LA, CMLI**

**of**

**Hankinson Duckett Associates**

**for**

**Worthing Borough Council**

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**hankinson duckett associates**

📞 01491 838175 📞 01491 838997 ✉️ [consult@hda-enviro.co.uk](mailto:consult@hda-enviro.co.uk) 🌐 [www.hda-enviro.co.uk](http://www.hda-enviro.co.uk)

The Stables, Howbery Park, Benson Lane, Wallingford, Oxfordshire, OX10 8BA

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# 1 INTRODUCTION

## 1.1 Qualifications and Instructions

1.1.1 I am an associate landscape architect at Hankinson Duckett Associates (HDA), a landscape architectural, ecological and environmental planning practice. I have a BA honours degree in Landscape Architecture and a post graduate Diploma in Landscape Architecture. I am a chartered landscape architect, a member of the Landscape Institute, and have been a landscape architect for over 30 years.

1.1.2 HDA designs and implements landscape and master-planning 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.

1.1.3 HDA was originally instructed by Worthing Borough Council (WBC) in September 2021 to prepare landscape evidence for an inquiry lodged by Persimmon Homes Thames Valley (PHTV) to support the Council's refusal on 11 March 2021 of the outline planning application (reference: AWDM/1264/20) for the following proposed development on about 20ha of land north-west of Goring Station, Goring-by-Sea, Worthing: (Note: The postcode for Goring station is BN12 6NT. The appeal site is also known as Chatsmore Farm. Refer to plans in **Appendix A** from Appellant's LVIA, CD A11):

*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.*

1.1.4 The application was refused for six reasons (some of which have since fallen away), and it is Reason for Refusal (RfR) No 1 that related to matters of landscape. It stated:

a) *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 An inquiry was held to determine the appeal. The Council's landscape evidence, for the inquiry held in January 2022, was prepared by a former Director of Landscape at HDA, Mr

Brian Duckett, however, following his retirement in March 2023, it was not possible for him to continue to represent WBC for the redetermination of this appeal. The appeal was allowed on 25 February 2022 but was subsequently quashed by the High Court. The decision to quash the appeal decision was upheld by the Court of Appeal which found that the Inspector had erred in his approach to the agreed harm the development would cause to the landscape and scenic beauty of the South Downs National Park (SDNP).

1.1.6 Following the quashing of the appeal decision, the application was re-considered by the Council's Planning Committee in August 2023. The Committee resolved to continue to contest the appeal with updated reasons for refusal, in part to reflect the adoption of a new Local Plan since the previous appeal was determined. Reasons for Refusal 1 and 2 contain aspects relevant to my evidence. They are as follows:

1. *The proposed development is outside of the built-up area as defined in the Worthing Local Plan (2023) and does not comprise development essential to the countryside nor does it comprise development of entry level exception sites. The proposed development also would have an adverse impact on the setting of the adjacent South Downs National Park and therefore is contrary to paragraph 176 of the National Planning Policy Framework and policies SS1 and SS4 of the Worthing Local Plan.*
2. *The proposed development comprises development in a designated Local Green Gap which would undermine the physical and visual separation of Goring and Ferring therefore compromising the integrity of the gap. Further, the proposed development by virtue of its scale would fail to conserve and enhance the benefits and services derived from the area's Natural Capital nor maintain the site as part of a cohesive green infrastructure network. The proposal therefore fails to comply with policies SS1 and SS5 of the Worthing Local Plan (2023).*

1.1.7 WBC approached HDA in October 2023 to present updated landscape evidence for the redetermination of this appeal. Prior to accepting the instructions, I familiarised myself with the appeal documentation, and, as per the original instruction to Mr Duckett, reviewed the Landscape and Visual Impact Assessment (LVIA) (prepared by CSA Environmental on behalf of PHTV, dated July 2020 – CD A11) which supported the outline planning application. In addition, I reviewed both the Council's (Mr Duckett's – CD C6/B) and Appellant's (Mr Self's – CD C5/B1 and C5/B2) evidence for the previous appeal, the appeal decision (CD L1 – subsequently quashed), the application by WBC to challenge the appeal decision in the High Court and the subsequent Court of Appeal decision (CD L2), and visited the site. I am, therefore, familiar with the appeal site and its landscape setting; with the character of the local area; with the background of policy, guidance and consultations; with the appeal proposals and their context.

1.1.8 At the Case Management Conference on 13 December 2023, the Inspector identified a number of main issues. The two main issues relevant to my evidence are:

- a) *The effect of the proposed development on landscape including the setting of the South Downs National Park; and*
- b) *The effect of the proposed development on the Local Green Gap.*

1.1.9 The evidence which I have prepared and provide for the redetermination of this appeal, reference APP/M3835/W/21/3281813, in this my 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 impact of the proposals on the landscape character and visual amenity of the appeal site and the surrounding landscape, including the setting to the South Downs National Park (SDNP) and the local gap between Goring-by-Sea and Ferring. To facilitate my assessment of the potential effects of the proposed development on landscape features, local character and visual amenity, and following a similar format to that adopted by Mr Duckett in his proof, I have undertaken my own Landscape and Visual Appraisal (LVA) within this proof of evidence.

1.2.2 The methodology I have used to undertake my LVA is set out at **Appendix B** of this proof and is the same as that used by Mr Duckett in his proof, and in the HDA landscape assessments undertaken for WBC in relation to the assessment of sites in the recently adopted Local Plan (CD E35). Those previous studies included the 'Worthing Gap and Landscape Capacity Study 2007' (CD G9), and the 'Worthing Landscape and Ecology Study' for 2015 (CD G7) and 2017 (CD G8). Those studies comprised a more detailed borough-wide character assessment, identifying local character areas, distinguished from each other by variations in landscape elements such as topography, land uses, vegetation patterns and scale to help inform judgements on the landscape sensitivity and capacity of areas for potential development in the borough.

1.2.3 As stated above, the HDA studies subsequently formed part of the evidence base of the now adopted Local Plan. Although I was not involved in the preparation of these studies, I have reviewed them and concur with their findings (as justified in the adoption of the Local Plan), and thus I am able to support the Council's position in so far as it relates to matters of landscape/visual. My assessment addresses the significance of effects, and the methodology has been developed on the basis of the latest advice provided by the Landscape Institute/ Institute of Environmental Management and Assessment (GLVIA3, CD G1) and Natural England (CD G2).

### 1.3 Structure of Evidence

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

1. **Introduction.**
2. **Landscape policy context:** Summary of the landscape aspects of planning policy against which the appeal proposals should be assessed.
3. **Site context:** Description of the local area, including the settlement pattern of Goring-by-Sea and Ferring, the landscape context of the appeal site and its setting to the SDNP.
4. **Landscape character:** Review of the published landscape character assessments for the area and description of the local landscape character for the site and its immediate area.
5. **Existing visibility:** An appraisal of the existing visibility of the site and the context of those views.
6. **The proposed development:** A description of the relevant landscape aspects of the appeal proposals.
7. **Landscape and visual assessment:** An assessment of the significance of effects of the appeal proposals, including the adverse effects of the development on “*the setting of the adjacent South Downs National Park*”, as stated in Reason for Refusal No 1.
8. **Landscape and visual assessment of the appeal proposals on the Chatsmore Farm Local Green Gap.** This section addresses how the proposed development would undermine the physical and visual separation of Goring and Ferring, thus compromising the integrity of the gap, as stated in Reason for Refusal No 2. It also considers how the proposed development, by virtue of its scale, would fail to conserve and enhance the benefits and services derived from the area’s Natural Capital and neither would it maintain the site as part of a cohesive green infrastructure network.
9. **Review against policy:** Review of whether the appeal proposals comply with the landscape aspects of policy and guidance.
10. **Conclusions:** A summary of my evidence.

## 2 LANDSCAPE POLICY CONTEXT

### 2.1 National Planning Policy

2.1.1 The National Planning Policy Framework (CD D7) sets out the government’s planning policy. Relevant paragraphs from the Framework are identified below:

- Chapter 2 – Achieving sustainable development: Paragraph 11 – Presumption in favour of sustainable development;
- Chapter 8 – Promoting healthy and safe communities: Paragraph 96 – Achieving healthy, inclusive and safe places;
- Chapter 12 – Achieving well-designed and beautiful places: Paragraph 135 – Design of developments;
- Chapter 15 – Conserving and enhancing the natural environment: Paragraph 180b) – Recognising the intrinsic character and beauty of the countryside; and Paragraph 182 – Conserving and enhancing landscape and scenic beauty in designated areas.

2.1.2 The National Planning Practice Guidance (NPPG) (CD D2) supports and informs the Framework and sets out further specific planning guidance. Paragraphs 036, 039 and 042 from the 'Natural Environment' section (Reference ID: 8-036-20190721, 8-039-20190721

and 8-042-20190721) are of relevance to the LVA in this proof, as they state:

**036: How can planning policies conserve and enhance landscapes?**

*The National Planning Policy Framework is clear that plans should recognise the intrinsic character and beauty of the countryside, and that strategic policies should provide for the conservation and enhancement of landscapes. This can include nationally and locally-designated landscapes but also the wider countryside.*

*Where landscapes have a particular local value, it is important for policies to identify their special characteristics and be supported by proportionate evidence. Policies may set out criteria against which proposals for development affecting these area will be assessed. Plans can also include policies to avoid adverse impacts on landscape to set out necessary mitigation measures, such as appropriate design principles and visual screening, where necessary. The cumulative impacts of development on the landscape need to be considered carefully.*

**039: What are the statutory duties of local planning authorities in relation to National Parks, the Broads and Areas of Outstanding Natural Beauty?**

*Section 11A(2) of the National Parks and Access to the Countryside Act 1949, section 17A of the Norfolk and Suffolk Broads Act 1988 and section 85 of the Countryside and Rights of Way Act 2000 require that 'in exercising or performing any functions in relation to, or so as to affect, land' in National Parks and Areas of Outstanding Natural Beauty, relevant authorities 'shall have regard' to their purposes for which these areas are designated. A list of the public bodies and persons covered under 'relevant authorities' is found in Defra guidance on this duty, and Natural England has published good practice guidance.*

*This duty is particularly important to the delivery of the statutory purposes of protected areas. It applies to all local planning authorities, not just National Park authorities, and is relevant in considering development proposals that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which might have an impact on their setting or protection.*

**042: How should development within the setting of National Parks, the Broads and Areas of Outstanding Natural Beauty be dealt with?**

*Land within the setting of these areas often makes an important contribution to maintaining their natural beauty, and where poorly located or designed development can do significant harm. This is especially the case where long views from or to the designated landscape are identified as important, or where the landscape character of land within and adjoining the designated area is complementary. Development within the settings of these areas will therefore need sensitive handling that takes these potential impacts into account.*

2.1.3 In addition, the National Design Guide illustrates how well-designed places that are beautiful, enduring and successful can be achieved in practice. It forms part of the Government's suite of planning practice guidance notes and should be read alongside the separate planning practice guidance on design process and tools.

**2.2 Local Policy**

2.2.1 The outline application, as validated on 7 August 2020, was assessed against the saved policies of the Worthing Local Plan (WLP 2003, CD E8), the Worthing Core Strategy (WCS, adopted 2011, CD E1) and the emerging policies in the Submission Draft Worthing Local Plan (January 2021, CD E2). With the adoption of the Worthing Local Plan 2020-2036 (WLP 2023, on 28 March 2023, CD E35), the saved policies from the WLP 2003 and those from the WCS have been superseded. The following list of policies from the WLP 2023



are those of relevance to the landscape and visual aspects of the appeal site (the full wording of which can be found in **Appendix C**):

Policy SS1 – Spatial Strategy; and

Policy SS4 – Countryside and Undeveloped Coast; and

Policy SS5 – Local Green Gaps.

2.2.2 In the Submission Draft WLP (CD E2), the appeal site was also put forward as a Local Green Space under Policy SS6, however, the LP Inspector, in his post-hearing advice letter (dated 9 December 2021 – CD E6), advised that Chatsmore Farm was an “*extensive tract of land*” and therefore did not meet criterion (c) of paragraph 102 (now paragraph 106) of the Framework, and was contrary to the NPPG. Policy SS6 of the WLP 2023 therefore does not apply to the appeal site.

2.2.3 As mentioned above (paragraph 1.2.2), reference has also been made to studies forming part of the evidence base for the WLP 2003, including ‘Worthing Gap and Landscape Capacity Study’ (HDA, July 2007, CD G9), the ‘Landscape and Ecology Study of Greenfield Sites in Worthing Borough’ (HDA, November 2015, CD G7), and in an update to the 2015 report, the ‘Review of Low Suitability Sites’ (HDA, March 2017, CD G8).

### **2.3 Designations and Development Considerations** (Refer to Appendix D of the Appellant’s LVIA, CD A11 at **Appendix A**)

2.3.1 Landscape: The site is not located within a nationally designated landscape, though it is close to the southern edge of the South Downs National Park, as defined by the A259 Littlehampton Road. It is common ground that the appeal site lies within the setting of the SDNP. The red line boundary of the appeal site lies within 90m of the boundary of the SDNP (though the distance on the Concept Masterplan (CD A22 and in **Appendix A**) between proposed built development and the boundary of the SDNP would be about 240m). There are no Tree Preservation Orders (TPOs) within the site or close to it.

2.3.2 Ecology: There are no ecology designations within or adjacent to the site. Woodlands over 0.9km to the north of the site (Highdown Copse and Street’s Copse, within the SDNP) are listed on Natural England’s Inventory of Ancient Woodland (AWI) (and are also Local Wildlife Sites). Although not a statutory designation, woodland around Highdown Gardens (see Heritage below), 0.4km to the north of the appeal site, is shown on the government’s ‘Magic’ website (Multi Agency Geographic Information for the Countryside) on the ‘Priority Habitat Inventory’ as Deciduous Woodland’. Land to the north of Highdown Gardens is also a Local Wildlife Site.

2.3.3 Heritage: There are no statutory heritage designations within or adjacent to the site, but three Grade II Listed Buildings lie close to the site; two to the north of the A259 (North Barn)

and one adjacent to the western site boundary (Clematis/Jasmine Cottage). Other listed buildings in the area are within the adjoining urban fabric and thus have no intervisibility with the site. To the north of the A259 lies the Grade II\* Registered Park and Garden of Highdown. The nearest Scheduled Monument to the site is a Ram's Hill type enclosure at Highdown Hill, which lies about 0.9km to the north-west of the site. There is intervisibility between these heritage features and the site (refer to Photograph 21 in the Appellant's LVIA from Highdown Hill – **Appendix A**).

2.3.4 Public Rights of Way: A PRoW lies along the southern boundary of the site (Footpath 2121) between Goring Station (at its east end) and Ferring Lane (at its west end). At the south-west corner of the appeal site, this footpath is joined at right angles by Footpath 2121\_1, which is aligned along the western site boundary. Another footpath (2139) and a bridleway (2135) join the north side of the A259 and climb up the foot-slopes of the Downs onto the outlier of Highdown Hill. Footways also exist along the Goring Street and the Littlehampton Road sections of the A259, beyond the eastern and northern boundary of the appeal site respectively.

2.3.5 Development Constraints: An overhead electricity cable currently crosses the site from the north-east corner to cross the railway beyond the site's south-west corner, but it is proposed (on the Concept Masterplan – CD A22) that this could be undergrounded and/or diverted to accommodate the proposed development.

### **3 SITE CONTEXT**

#### **3.1 The Appeal Site and Its Setting**

3.1.1 The appeal site lies on the western edge of Worthing Borough (in the county of West Sussex), with the western site boundary coinciding with the district boundary of Arun District. The settlement of Goring-by-Sea lies to the east of the appeal site, beyond the A259 Goring Street. The southern site boundary is defined by the Brighton to Littlehampton railway line, with Goring-by-Sea train station lying just beyond the south-east corner of the site. The settlement of Ferring (within Arun District) lies mainly to the west of the site. There is a ribbon of development to the south of the railway line between Goring-by-Sea and Ferring (dating from the 1950s/60s).

3.1.2 The Appellant has argued, through its representations to the Local Plan Inspector and in the previous appeal, that this means the settlements of Goring-by-Sea and Ferring have already coalesced such that the appeal site does not perform a gap function. That argument was rejected by the Local Plan Inspector, who found at paragraph 60 of his report, "... with reference to a proposal for housing development not included in the plan (i.e., the appeal scheme), it was put to me that Chatsmore Farm does not function as a 'gap' and is rather an indentation in an otherwise continuous pattern of development. It is

*true to say that between the proposed Chatsmore Farm and Goring-Ferring gaps there is a block of development which already joins Goring and Ferring, with housing estates and a school located either side of Goring Way. Notwithstanding this, the western gaps (i.e., Chatsmore Farm and the Goring-Ferring Gap to its south) clearly provide breaks in the built up form and help prevent the sense that the two areas have merged completely or lost their own identities”.*

3.1.3 The appeal site is a single arable field with sporadic, woody vegetation (intermittent hedges, comprising trees and scrub) restricted to its perimeter, and the watercourse of Ferring Rife forming the northern site boundary. To the north of the Rife, another arable field lies between the site and the A259 Littlehampton Road. The appeal site and the field to its north, together with another smaller, arable field to its west (in Arun District) combine to form the ‘Chatsmore Farm’ gap (as defined in Policy SS5: Local Green Gaps of the WLP 2023) between the settlements of Goring-by-Sea and Ferring. The field within Arun District is designated as a ‘gap between settlements’ in the Arun District Local Plan (2018). The larger ‘Goring-Ferring Gap’ lies over 0.6km to the south of the appeal site. These two gaps, on the western edge of the Borough, together with two gaps on the eastern edge of the Borough, form the only breaks in the almost continuous band of urban development along this stretch of coast.

3.1.4 The appeal site is adjoined to its west, south and east by existing development, including some 3 to 4-storey buildings along Goring Street beyond the south-east and north-east corners of the site. In contrast, the land to the north rises up the dip slope of the South Downs and is more open in character.

## **3.2 Landform and Drainage**

3.2.1 The geology underlying the appeal site is the Lewes Nodular Chalk Formation, with other chalk formations rising in bands to the north of the site to form the elevated Highdown Hill (at 81m Above Ordnance Datum (AOD)). The topography of the appeal site is reflective of the wider coastal plain, being largely flat (a spot height of 9m AOD is shown on the OS Explorer map on the A259 north of the appeal site).

3.2.2 The watercourse of Ferring Rife forms the northern site boundary, between May Bridge (on the eastern site boundary with the A259) and properties on Ferring Lane, before flowing westwards through north Ferring, to enter the sea to the west of the village. The soilscape of the site is ‘No 6 – freely draining slightly acid loamy soils’, which is likely to be free-draining (refer to [www.magic.defra.gov.uk/](http://www.magic.defra.gov.uk/)). This gives rise to land of Grade 1 and 2 (Best and Most Versatile) in the Agricultural Land Classification across the majority of the site, with a band of Grade 3b land along the northern edge of the site (also refer to [www.magic.defra.gov.uk/](http://www.magic.defra.gov.uk/)).

### **3.3 Land Use and Vegetation**

3.3.1 The appeal site is a large-scale field in arable use, lying between existing housing developments of Goring-by-Sea (in Worthing) to the east and Ferring (in Arun District) to the west. To the south, beyond the railway line, detached residential houses on Singleton Crescent and terraced housing at Bluebell Way are separated by the playing fields associated with St Oscar Romero Roman Catholic High School (Chatsmore). To the north of the A259, within the SDNP, are further large-scale arable fields, some sports fields and the access to the Registered Park and Garden of Highdown (access via Highdown Rise). The garden is set within trees to the south-east of the prominent chalk outlier of Highdown Hill (a Scheduled Monument).

### **3.4 Settlement Pattern**

3.4.1 The appeal site lies outside the Built Up Area Boundary (BUAB), as defined in Policy SS1 of the WLP 2023. Land between the two Local Green Gaps as defined in Policy SS5 was, before the mid-19<sup>th</sup> Century, also open, except for the Brighton to Littlehampton railway line and a Holm Oak avenue planted as part of the Goring Hall estate (refer to extract from OS Six-inch series from 1879 **Appendix D**). This tree-lined avenue, now forming Ilex Way and Bridleway 3111, linked the two communities. During the 1950s and 60s, residential development infilled the land between Ilex Way and the railway line to the north, and these two features have formed an enduring boundary to development between the two settlements since that time. (Refer to 1970s historic mapping in **Appendix D**). Development since the 1970s has been limited to small developments of flats off Goring Street (i.e., Bluebell Way), with the gaps between the two settlements remaining largely unchanged to the present day.

## **4 LANDSCAPE BASELINE**

### **4.1 Published Character Assessments**

#### National Character

4.1.1 The appeal site lies within National Character Area (NCA) No 126: South Coast Plain (CD G3), which is described in Natural England's profile as "*one of the most concentrated stretches of shoreline ribbon development in Britain*" (page 8). The landscape character of the appeal site reflects several key characteristics listed for this NCA. Extracts from NCA 126 can be found in **Appendix E**. One of the strategic environmental objectives for this NCA is to "*maintain and enhance areas of open countryside in this heavily urbanised NCA, to preserve the distinct settlement pattern*" (page 15).

#### Regional/County Scale

4.1.2 Within the 'West Sussex Landscape Character Assessment' (WSLCA, CD G4 and extracts at **Appendix F**), the appeal site lies within Landscape Character Area (LCA) SC11 'Littlehampton and Worthing Fringes'. The site exhibits some of the characteristics listed for LCA SC11, particularly the following (my underlining for emphasis):

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

4.1.3 One of the 'Change – Key Issues' identified for LCA SC11 is “*extension of coastal conurbation*”, and in the related 'Landscape and Visual Sensitivities' section, the 'key sensitivities' are “*urban development pressures, especially in the gaps between settlements*” and the “*closing of open views between settlements*”.

4.1.4 To the north of the A259 Littlehampton Road and parallel to it, lies the boundary with LCA SC12 'Angmering Upper Coastal Plain', which aligns with the southern boundary of Highdown Gardens.

#### Borough Scale

4.1.5 In the 'Worthing Gap and Landscape Capacity Study' (2007, CD G9 and extracts at **Appendix G**), the site forms the southern end of the 'Goring Coastal Plain - 05'. This is characterised by semi-open, large-scale, arable fields (Landscape Character Type L1c), and Area 05 extended to include fields north of the A259 Littlehampton Road, and the small field to the west of the appeal site (in Arun District). In the 'Landscape and Ecology Study of Greenfield Sites in Worthing Borough (2015, CD G7 and extracts at **Appendix H**), the appeal site was assessed as one of eight sites, as part of Site 5, Chatsmore Farm (land south of Highdown, which included the field to the north of the appeal site too).

4.1.6 The 2015 Study (CD G7) split Site 5 into Zone A (the majority of the appeal site and the field to its north) and Zone B (a triangular area in the south-west corner of the site) on the basis that Zone A was more visually prominent than Zone B. Whilst most of Zone B is visible from the high ground within the SDNP, it is “*partially contained to the north by vegetation along the north-west site boundary, and forms a less prominent part of the visual separation between Goring and Ferring than Zone A*” (page 47, paragraph 5.85). The 2015 Study assessed the suitability of Zone A for housing development as Negligible/Low and Zone B as Low. In the 2017 'Further Review of Low Suitability Sites' (CD G8, and extracts at **Appendix J**), Zone A/Site 5A continued to be assessed as having Negligible/Low suitability for development, but changed the suitability of Zone B/Site 5B to Moderate, but

only when considered in conjunction with the field to the west in Arun District. It is notable that both studies were undertaken prior to the adoption of the Arun District Local Plan in 2018, which defines the field beyond the south-west corner of the appeal site a Gap between Settlements. This evidently reduced the suitability of Zone B/Site 5B for development as a stand-alone site, due to accessibility issues.

4.1.7 The appeal site exhibits some of the key landscape characteristics described in the county character assessment and borough studies. In summary, the site is part of a working agricultural landscape and forms part of the narrow gap between Goring-by-Sea and Ferring. The site's arable use ensures that urban fringe land uses such as horsti-culture or light industry do not exist. There is intervisibility between the appeal site and the wider agricultural landscape, particularly of the downland rising to Highdown Hill to the north. A sharp contrast exists between the agricultural landscape of the appeal site and the settlement edge. The openness of the appeal site can be appreciated from public footpaths and local roads, as well as the well-used informal footpaths that follow Ferring Rife and the site's field boundaries.

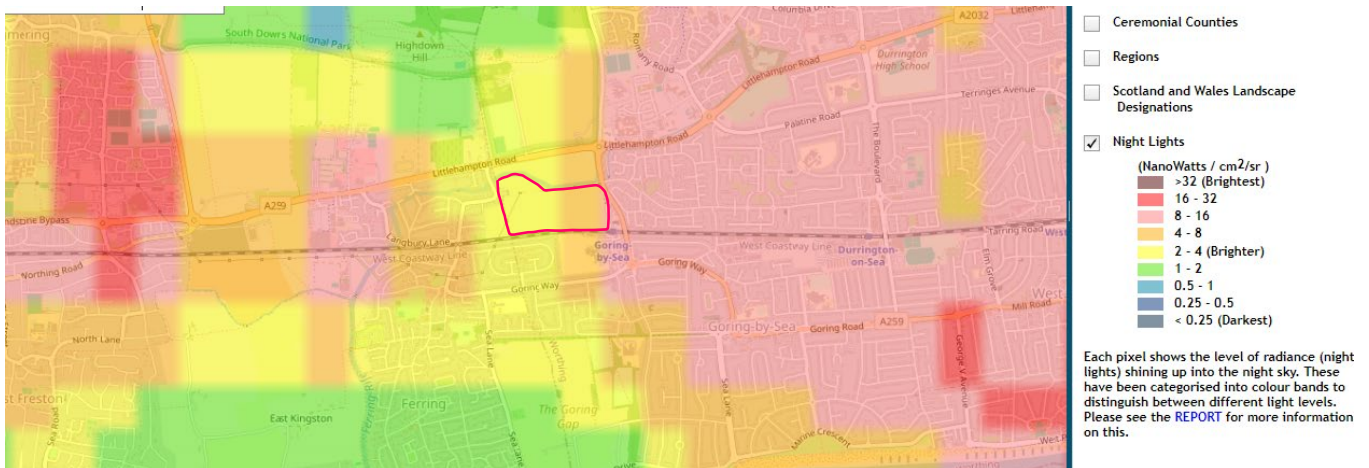
## 4.2 Perceptual and Experiential Qualities

4.2.1 The site is adjoined by settlement edges to its west, south and east, with intervisibility with, and associated urban influence from, development along the A259 Goring Street, Ferring Lane and Singleton Crescent. Distant background noise from the A259 Littlehampton Road and intermittent trains are reminders of the site's urban context, however, by virtue of its size (in conjunction with the fields beyond the site to its north and west), the appeal site is relatively quiet. There are many opportunities to appreciate the existing open and undeveloped nature of the site from the two footpaths within the site (Footpath 2121 and 2121\_1), as well as from external viewpoints due to its limited boundary vegetation (the site is open mainly to its west and north, though it is more treed along its eastern boundary).

4.2.2 In terms of experiential qualities, the site does not possess features of high scenic quality, with most vegetation being restricted to the perimeter of the site (as well as beyond the red line boundary). The landscape features on the site are not rare, this being working, agricultural land, but are complementary to the landscape of the SDNP to the north. The key quality of the site is its openness and the ability to experience the gap between the two settlements (over 650m wide) and views to the elevated landscape of the SDNP from the public footpaths along its southern and western boundaries and from footways alongside the local road network. These paths provide ease of access to the wider landscape (particularly to the north) from the built-up area of Goring-by-Sea and Ferring.

4.2.3 The extract below, from the CPRE dark skies interactive map (<https://www.nightblight.cpre.org.uk/maps/>), indicates that the site whilst influenced by the

adjacent settlement areas to its west and east, benefits from lower light levels.



### 4.3 Landscape Sensitivity

4.3.1 Landscape receptors are “components of the landscape that are likely to be affected by the scheme” (GLVIA, page 86, paragraph 5.34 – CD G1). These can include “overall character and key characteristics, individual elements or features and specific aesthetic or perceptual aspects”. For ease of comparison, I have used the same key landscape receptors that are likely to be affected by the proposed development as were identified at the previous appeal. A comparison table of landscape and visual judgements (CD K6) was prepared for the previous appeal by the Appellant’s (Mr Self) and Council’s (Mr Duckett) landscape witnesses, which included the following landscape receptors, split into direct effects on landscape features (within the appeal site), and indirect effects on defined areas of landscape/townscape character, as follows:

#### Direct effects on landscape features:

- Site trees – limited number of small trees within hedgerows on the site’s perimeter including along Ferring Rife;
- Hedgerows/scrub – sections of hedgerow forming garden boundaries at Ferring, together with other intermittent sections to perimeter of site;
- Watercourse – Ferring Rife, a broad drainage channel forming northern site boundary (an infrequent feature in the landscape);
- Public footpaths and public access – Footpath 2121 is within the site, along the southern site boundary, in proximity to the railway line. Footpath 2121\_1 lies outside the site, along the southern half of the western site boundary. Other informal footpaths exist around the site’s perimeter;
- Land use: arable farmland - the majority of which is Grade 2, thus best and most versatile; and
- Heritage assets – There are no statutory heritage assets within or immediately adjacent to the site.

#### Indirect effects on defined areas of landscape/townscape character:

- Landscape character of site and immediate area of LCA SC11: Littlehampton and Worthing Fringes – split into two:
  - Site and field to the north of Ferring Rife; and

- Wider LCA of SC11 to the north of the A259 Littlehampton Road;
- Wider landscape character of LCA SC12: Angmering Upper Coastal Plain;
- Townscape character of neighbouring area; and
- Heritage assets, e.g., Highdown Conservation Area and Registered Park and Garden.

4.3.2 The landscape sensitivity of a receptor comprises a combination of landscape value and susceptibility to change (see **Appendix B** for further details of HDA's methodology). 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.

4.3.3 The appeal site (and fields to its north and west) lies outside the NP, and its landscape value could be reasonably considered to be reflective of ordinary countryside, however, that value is elevated by virtue of its function, not only as part of the coastal setting to the NP, but also as part of an important gap, and on account of the scarcity of such open land along the coastal plain. There are also likely to be variations between the various landscape receptors identified within the study area, with differences at the local scale in tranquillity, landscape condition, scenic quality and representativeness. The landscape value of the site is considered to be High (refer to 'Landscape and Ecology Study, 2015' (CD G7), which assessed Site 5 as having Substantial landscape value (refer to **Appendix H**). However, the site is not considered to represent a 'valued landscape', a point which has been agreed between the parties.

4.3.4 The susceptibility of the site to the proposed development would 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, CD G1). Landscape receptors that are both physically and visually separated from the site (within the wider landscape) would be less susceptible to the changes brought about by the proposed development than those which have a relationship to the site

4.3.5 Judgements relating to 'landscape value' and 'susceptibility to change' for identified landscape receptors were not provided in the 'Comparison Table of Landscape and Visual Effects' (CD K6) prepared for the previous appeal, with only the landscape sensitivity of receptors being presented. This is understandable, because whilst assessments of 'value' and 'susceptibility' make judgements of 'sensitivity' more easily understood and traceable, such judgements between receptors are more nuanced, as reflected in paragraph 5.46 of GLVIA (CD G1), which states:



*There can be complex relationships between the value attached to landscape receptors and their susceptibility to change which are especially important when considering change within or close to designated landscapes.*

4.3.6 Mr Self's assessment (in the application LVIA (CD A11) and in his previous PoE (CD C5/B2)) gave the landscape character of the site and the field to the north of Ferring Rife a Medium sensitivity to the proposed development, whereas I agree with the sensitivity assessment provided by Mr Duckett, of High/Medium. This judgement is supported by the 'Landscape and Ecology Study, 2015' (CD G7) where the landscape sensitivity assessment for Site 5 was Substantial for Zone 5A, which included the larger part of the appeal site, and Moderate for Zone 5B, which covered the smaller, south-west corner of the appeal site. In the 2017 update of this study (CD G8), the assessments for landscape sensitivity for both Site 5A and 5B remained unaltered, though the landscape value of Site 5B was changed from Substantial to Moderate.

4.3.7 The landscape surrounding the site contrasts between the landscape of the countryside (within WSLCA SC11 and SC12) and areas that are associated with the settlements of Goring-by-Sea and Ferring, which have been substantially modified. These receptors have been assessed with varying degrees of landscape sensitivity, which are set out in the following table, which also provides a comparison with the judgements provided by Mr Self.

Table 1 – Summary of Landscape Sensitivity Judgements

Landscape Receptor	My Sensitivity Judgements	Mr Self's Sensitivity Judgements
Direct effects on landscape features		
Site trees	Medium	Low
Hedgerows/scrub	Medium	Low
Watercourse	High	Medium
Public footpaths and public access	High	Medium
Land use: arable farmland	High	Medium
Heritage assets (though none within the site)	High	High
Indirect effects on defined areas of landscape/townscape character		
Site and field to the north of Ferring Rife	High/Medium	Medium
Wider LCA of SC11 to the north of the A259 Littlehampton Road (within the SDNP)	High	Medium/High and High
Wider landscape character of LCA SC12: Angmering Upper Coastal Plain	Very High	Very High
Townscape character of neighbouring area	Medium	Medium
Heritage assets	Very High	Very High

## 5 VISUAL BASELINE

### 5.1 Introduction

5.1.1 My baseline landscape assessment of the appeal site has identified that the local landscape is one of stark contrasts between large-scale arable fields, defined by intermittent perimeter vegetation, and long-established, adjacent areas of urban settlement which help contain views to the west, south and east, but with open views to the elevated landscape of the SDNP to the north.

5.1.2 Potential visual receptors were identified for the previous appeal and I agree that these (as stated in the Landscape SoCG) are “*the main visual receptors which could potentially be affected by the appeal scheme*”. However, I have only assessed publicly accessible receptors. A distinction has been made between public and private views to accommodate differences in the sensitivity of these 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.

### 5.2 Public Views and Key Viewpoints

5.2.1 Public views are generally restricted to lengths of footpaths (PRoWs and informal routes) which cross the site, neighbouring roads and footways that are adjacent to the site and those middle distance views from within the SDNP. Further away from the site within the adjacent settlements, intervening buildings limit views. The comparison table of judgements prepared for the previous appeal (CD K6) identified that the public have views of the site from the following visual receptor locations:

- A259 Littlehampton Road (Photographs 09, 10, 11, 12 and 17, and Photomontage 12);
- Goring Street (Photographs 06, 07, 08 and 16);
- Public footpaths 2121 and 2121\_1 (Photographs 01, 02 and 15);
- Coastal railway line;
- Goring-by-Sea railway station footbridge (Photograph 5);
- Singleton Crescent and Chatsmore (St Oscar Romero) Catholic High School (Reverse view from Photographs 12 and 21);
- Ferring Lane and Green Park (Photograph 13 and 14);
- Highdown Rise (Photograph 20);
- Highdown Gardens;
- Highdown Hill, Footpath 2139 and Highdown Hill Fort (Photograph 21);
- Footpath 2139 and Restricted Byway 2139\_4 (Photograph 18);
- Public open space on Honeysuckle Lane, High Salvington (Photograph 22); and
- Cissbury Ring (Photograph 23).

5.2.2 **Footpaths 2121 and 2121\_1:** These footpaths afford close range views of the appeal site,

which makes a substantial contribution to the sense of openness and separation between the settlements of Goring-by-Sea and Ferring. There are also uninterrupted views towards the SDNP, including Highdown Hill from Footpath 2121 as it runs along the southern edge of the appeal site. From this footpath, the site forms a significant part of the extensive, open and agricultural foreground setting to the SDNP and Highdown Hill.

5.2.3 **Highdown Hill:** The appeal site is open to views from this viewpoint, which is a popular visitor attraction, given it is a prominent hill fort in the SDNP (owned by the National Trust). The view is important to the appreciation of the setting of the SDNP. In the SDNP View Characterisation Study (CD G6 and extracts included at **Appendix K**), Viewpoint 31 from Highdown Hill is representative of the high downs looking south out to sea. In the 'Special Qualities' section for this view type (represented by Viewpoint 31 and nine other such viewpoints), the Study states "*the elevated position of these viewpoints on the downs above the coastal plain means this view type represents the 'brehtaking views' that are noted in the first of the Park's special qualities*" (paragraph 3.25 of CD G6). The View Characterisation Study sets management guidance to ensure that the special qualities of the SDNP are retained, one of which is to "*ensure that development outside the NP does not block, or adversely affect the quality of, views towards the sea*" (paragraph 3.27).

5.2.4 In views from **Highdown Hill**, the site forms a prominent part of the middle-distance landscape, with the appeal site seen as part of the wider gap between Goring-by-Sea and Ferring in the context of existing settlement and the distant horizon formed by the English Channel. The appeal site, in conjunction with adjacent fields, forms a substantial break in the built form to the north of the railway line, extending undeveloped land south from the SDNP onto the coastal plain. The open character of such views continues, in part, south of the railway line to include the school playing fields to the south-east of the site.

### 5.3 **Summary of Existing Site Visibility**

5.3.1 The site's visual envelope is restricted to the west, south and east by existing development and views from within the built-up areas are restricted to those properties on the edges of the settlements, as these screen views from roads and dwellings further into the built up areas. Locally, the site is poorly contained by boundary vegetation. The elevated landform of the SDNP is well served by public footpaths which afford views over the site. The viewpoint on Highdown Hill is only 0.96km from the appeal site boundary, so rather than forming a small component of the view, the site is easily perceived as a gap in the context of the adjacent settlement.

5.3.2 Viewpoint locations with no views of the site (at any time of the year), where the visibility of the site would not conceivably change as a result of the proposed development, have not been taken forward for assessment within this report.

## 5.4 Visual Sensitivity

5.4.1 The visual sensitivity of a particular viewpoint location is assessed as a combination of viewer susceptibility and the value attached to the view. The type of activity that a person or visual receptor is engaged in affects susceptibility, as does the experience (e.g. scenic quality, rarity, perceptual aspects, landmarks) of the viewer at a particular location and the extent to which the viewer can accept change of a particular type and scale without unacceptable adverse effects on the character and extent of the view.

5.4.2 **Public Rights of Way (PRoW):** The most sensitive visual receptors to changes within a view are people whose activities are likely to be focussed on the landscape. These include users of public footpaths, such as Footpaths 2121 and 2121\_1 on the site's perimeter, and to a lesser degree, pedestrians on the footways along the A259. In mid-distant views from the SDNP (Footpath 2139), the site is seen as part of 'breath-taking views' encompassing existing settlement as well as the English Channel forming the horizon. The sensitivity of receptors with views from these public footpaths has been assessed as High.

5.4.3 **Roads:** There are views of the site from sections of the A259 (Littlehampton Road and Goring Street) and to a lesser degree from Ferring Lane and Green Park as experienced by motorists and pedestrians. In views from these roads, the site is seen in the context of urban development and traffic, thus the sensitivity of pedestrians on these footways has been assessed as Medium-High. Motorists using these roads are unlikely to be focussed on views of the countryside, and are more likely to be travelling at speed, meaning that their views of the site will be transient in nature. The visual sensitivity of motorists using these roads has been judged to be Medium.

5.4.4 The following table sets out the sensitivity of public visual receptor groups considered within this evidence, and provides a comparison with the judgements provided by Mr Self:

Table 2 – Summary of Visual Sensitivity Judgements

Visual Receptor/Viewpoint Location	My Sensitivity Judgements	Mr Self's Sensitivity Judgements
A259 Littlehampton Road – Pedestrians/Cyclists	Medium/High	Medium
A259 Littlehampton Road - Motorists	Medium	Low
Goring Street – Pedestrians/Cyclists	Medium/High	Medium
Goring Street - Motorists	Medium	Low
Public footpaths 2121 and 2121_1	High	Medium
Coastal railway line	Medium	Low
Goring-by-Sea railway station footbridge	Medium	Low
Singleton Crescent and Chatsmore (St Oscar Romero) Catholic High School	Medium/High	Medium

Visual Receptor/Viewpoint Location	My Sensitivity Judgements	Mr Self's Sensitivity Judgements
Ferring Lane and Green Park - Pedestrians	Medium/High	Medium
Highdown Rise	High	High
Highdown Gardens	High	High
Highdown Hill	Very High	High
Footpath 2139 and Restricted Byway 2139_4	High	High
Public open space on Honeysuckle Lane, High Salvington	High	High
Cissbury Ring	Very High	High

## 6 DESCRIPTION OF THE PROPOSED DEVELOPMENT

### 6.1 Description of the Proposals

6.1.1 The application was submitted in outline, with all matters reserved, for the residential development of 20ha of land to provide 475 dwellings and the provision of a local centre on the southern part of the site (10.2ha), set within about 10ha of public open space, primarily along Ferring Rife. The vehicular site access would be off the A259, Goring Street (via a new roundabout), and it is proposed to underground the overhead electricity transmission lines. No parameter plans were submitted with the application, therefore I have assessed the scheme as portrayed in the 'Concept Masterplan' (CD A22), in the Design and Access Statement (CD A4), and the illustrative landscape strategy (Appendix F of CD A11, and included at **Appendix A**). Photomontages have been included in the LVIA (Appendix I of CD A11), from Photograph Locations 12 (the A259), 20 (Highdown Rise) and 21 (Highdown Hill) as included at **Appendix A**.

6.1.2 The proposed housing mix is not fixed (to be determined as part of future reserved matters submissions), however, it is proposed that the percentage of affordable houses would be 40% (equates to a maximum of 190no units) to accord with Policy DM3 of the WLP 2023. The majority of the development is proposed to be 2-storey, except for taller blocks associated with the local centre (adjacent to Goring train station). The proposed housing density would need to reflect the surrounding context and the proximity of visual receptors (and with reference to Policy DM2 of the WLP 2023).

### 6.2 Illustrative Landscape Proposals

6.2.1 Although the detailed soft and hard landscape proposals will be assessed at the reserved matters stage, an illustrative landscape strategy (CD A11) has been prepared for the appeal site, comprising the following features:

- 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 the land to the south;

- New native shrub and tree planting to Ferring Rife;
- Street trees and amenity planting;
- Additional pedestrian and cycle connections to Ferring and Goring-by-Sea; and
- Provision of Sustainable Drainage Systems (SuDS), to include permanently wet habitat features.

6.2.2 The Inspector for the previous appeal stated in the 'Planning Obligations' section of his decision letter (CD L1, paragraph 80) that "*obligations in relation to public open space and play areas (both on site and off site) are necessary to meet the anticipated demand for such spaces and to reduce social disparity within the borough*". Provision and access standards for Public Open Space, as set out in Policy DM7: 'Open Space, Recreation and Leisure' and Policy DM19: 'Green Infrastructure' of the WLP 2023, would need to be met on-site (only at the Reserved Matters stage could it be demonstrated that obligations would be met). The Inspector for the previous appeal recognised the provision of public open space and play areas as a benefit, "*however, these are, in the main, intended to help mitigate the impact of the proposed development. As such, I afford them only limited weight*" (CD L1, paragraph 90).

## **7 PREDICTED EFFECTS OF THE PROPOSED DEVELOPMENT**

### **7.1 Introduction**

7.1.1 The potential effects of the proposed development are assessed below, at Year 0, when the potential effects are at their greatest and at Year 15, following the establishment of the mitigation strategy. In order to assess the potential effects of the proposals, certain assumptions have been made about the height of proposed buildings, the size of trees specified and the growth rates of any proposed vegetation. These assumptions are:

- Proposed dwellings would be a maximum of four storeys high, to reflect existing flats in Goring-by-Sea, though an assumed maximum height above surrounding ground levels to the ridge of the rooftop has not been provided in the DAS (CD A4).
- Existing trees and vegetation have an assumed growth rate of 0.35m per year, however it is assumed that the mature trees within the site would not have additional growth and that the existing hedgerow would be maintained at its existing height (approximately 2-3m) until the proposed hedgerow matches it in height.
- New planting is assumed to have no growth in the first year after planting, and 0.35m per year thereafter. Actual growth rates will depend on environmental conditions and tree species. It is likely that the proposed trees would have grown higher than have been assumed for this assessment.
- The majority of trees planted within the proposed development would be planted as select standards, with a height of 3-3.5m or as feathered trees (1.5 – 1.75m high). The feathered trees would be native trees within hedgerows/tree belts, which establish better when planted at a young stage (e.g. Beech and Oak). After 15 years of growth, we have assumed that a select standard tree would have reached a minimum height of 6-6.5m, and that the feathered trees would have reached approximately 4.5-5m high.

- Hedgerow and native shrub planting would be introduced as bareroot whips, approximately 0.4 - 0.8m high (depending on species). Hedgerow heights after 15 years of growth have been assumed to be 2.5-3m.

7.1.2 The magnitude of change is a judgement on the size or scale of effect and is combined with the landscape or visual sensitivity to give a judgement on the significance of effects resulting from the proposed development.

## **7.2 Predicted Landscape Effects**

7.2.1 The scheme would retain all high quality landscape features on the perimeter of the site, which would be protected throughout the course of development. The only removal of features would be about 175m of hedgerow (and associated trees) to create the site access. The most noticeable landscape effects would arise within the site at construction, when, in addition to the formation of the site access, the new dwellings would be constructed (involving groundworks and use of cranes). At completion of the construction phase, the site would change from an arable field, surrounding by intermittent trees and hedgerows, to a residential development, interspersed with public open space and green infrastructure, which would be characteristic of the adjacent urban areas. At this stage, the proposed planting would be immature and of limited effect.

7.2.2 The magnitude of change to the landscape of the appeal site has been assessed as High at construction, when the changes would be most pronounced. The effects would be permanent and Substantial Adverse, and this high level of effect is recognised as a consequence of developing a greenfield site.

7.2.3 It is thus accepted that a High magnitude of change would occur on the site at construction, when the arable field would be replaced with a residential development, however, the effects on the wider landscape character (of LCA SC11) have been assessed as a Medium magnitude of change but with a High magnitude of change to the townscape due to the disbenefits of a loss of openness. There would be no physical loss of landscape features beyond the confines of the site, however, the site would be easily perceived from the wider landscape/townscape as the existing woody vegetation on its boundaries would not have been augmented at this stage. This intermittent vegetation makes the site, and thus the proposed development, open in nature so it would have a great influence on the wider landscape/townscape.

7.2.4 Although the proposals could be designed to be characteristic of adjacent existing housing developments, it is loss of the openness that the appeal site contributes to its surroundings that would be the most significant effect on landscape character. Based upon a High sensitivity for LCA SC11 and a Medium magnitude of change, the significance of effect of the proposed development on this wider landscape setting is thus assessed as Substantial

Adverse at the time of construction. The same significance of effect has been assessed on the townscape character of the surrounding area, though based upon a Medium sensitivity and High magnitude of change.

7.2.5 Fifteen years post completion, the proposed landscape scheme would have established. The existing retained perimeter trees and hedgerows, augmented by new planting, would contain the site. Within the site, the new character of the development would emerge, with an expected increase in characteristic features. Despite this, I have assessed that the magnitude of change would not reduce with the maturing of mitigation measures, as the effects arising from changing an arable field to a new housing development, on a site so highly valued for its openness, could not be mitigated with planting (which would serve to further reduce openness). The residual significance of effect on the site would remain at Substantial Adverse, with a reduction in effects to the landscape north of the A259 to Substantial/ Moderate Adverse.

7.2.6 The introduction of new housing to a greenfield site will inevitably lead to adverse effects on landscape character, though this may in some cases be balanced against the beneficial effects of introducing landscape features which are characteristic of the area (such as increasing the tree cover in an area), however, where openness is the landscape quality of greatest value, replacing it with built form and soft landscape would be the antithesis of maintaining the gap.

7.2.7 The table below summarises the predicted effects on landscape receptors (with my judgements in green and Mr Self's judgements in orange).

Table 3: Summary of Landscape Effects

Landscape Receptor	Sensitivity	Construction		15 Years Post Completion	
		Magnitude of Change	Effects	Magnitude of Change	Effects
Direct effects on landscape features					
Site trees	Medium	Low	Minor Adverse	Medium/Low	Moderate/ Minor Beneficial
Site trees	Low	Slight	Negligible Beneficial	Slight	Moderate Beneficial
Hedgerows/scrub	Medium	Low	Minor Adverse	Medium	Moderate Beneficial
Hedgerows/scrub	Low	Slight	Slight Adverse	Slight	Moderate Beneficial



Landscape Receptor	Sensitivity	Construction		15 Years Post Completion	
		Magnitude of Change	Effects	Magnitude of Change	Effects
Watercourse	High	Very Low	Negligible	Low	Minor Beneficial
Watercourse	Medium	Slight	Negligible Beneficial	Slight	Slight Beneficial
Public footpaths and public access	High	Low	Minor Adverse	Very Low	Negligible
Public footpaths and public access	Medium	Slight	Moderate Beneficial	Slight	Moderate Beneficial
Land use: arable farmland	High	High	Substantial Adverse	High	Substantial Adverse
Land use: arable farmland	Medium	Substantial	Substantial/Moderate Adverse	Substantial	Substantial/Moderate Adverse
Heritage assets	High	Very Low	Negligible	Very Low	Negligible
Heritage assets	High	Neutral	Neutral	Neutral	Neutral
Indirect effects on defined areas of landscape/townscape character					
Site and field to the north of Ferring Rife	High/Medium	High	Substantial Adverse	High	Substantial Adverse
Site and field to the north of Ferring Rife	Medium	Substantial/Moderate	Substantial/Moderate Adverse	Substantial/Moderate	Moderate Adverse
Wider LCA of SC11 to the north of the A259 Littlehampton Road (within the SDNP)	High	Medium	Substantial Adverse	Medium	Substantial/Moderate Adverse
Wider LCA of SC11 to the north of the A259 Littlehampton Road (within the SDNP)	High/Medium to High	Moderate/Slight	Moderate/Slight Adverse	Moderate/Slight	Slight/Negligible Adverse

Landscape Receptor	Sensitivity	Construction		15 Years Post Completion	
		Magnitude of Change	Effects	Magnitude of Change	Effects
Wider landscape character of LCA SC12: Angmering Upper Coastal Plain	Very High	Medium/Low	Moderate Adverse	Medium/Low	Moderate Adverse
Wider landscape character of LCA SC12: Angmering Upper Coastal Plain	Very High	Slight/Negligible	Slight/Negligible Adverse	Slight/Negligible	Negligible Adverse
Townscape character of neighbouring area	Medium	High	Substantial Adverse	High	Substantial Adverse
Townscape character of neighbouring area	Medium	Moderate	Slight Adverse	Moderate	Slight/Negligible Adverse

### 7.3 Predicted Visual Effects

7.3.1 The site has a limited visual envelope, except to the north which coincides with the elevated landform of the nationally designated landscape of the SDNP. The site is contained to its west, south and east by existing settlement, thus views from the wider townscape are contained by built form around the edges of the site. A large number of visual receptors visiting the Scheduled Monument at Highdown Hill in the SDNP, via the footpaths to this viewpoint, are afforded existing open views of the appeal site in the mid-ground, and these, together with users of public and informal footpaths around the site's perimeter, I assess, would experience Substantial Adverse effects on their visual amenity as a result of the proposed development.

7.3.2 The Inspector, in his decision letter for the previous appeal, gave his judgements on the effects of the proposed development on views, in particular those from Highdown Hill. He concurred with the appellant's assessment of the level of harm as "*moderate adverse and not significant*" (paragraph 47 of CD L1), whereas I concur with the Council's assessment of Substantial Adverse, which I judge to be 'Significant'. The previous Inspector (in paragraph 47) acknowledged that "*the appeal scheme would result in a clearly perceptible and noticeable change to the existing view*" from Highdown Hill but found that the view already included intrusive development. Whilst the view does include existing settlement, this is not the main focus of the view; it is the stark contrast between the openness of the appeal site and the urban edge that is most noticeable. The guidance within the SDNP View Characterisation Study (CD G6) is "*that development outside the NP does not block, or adversely affect the quality of, views towards the sea*" (refer to paragraph 5.2.3 above).

Given the elevation afforded to views from Highdown Hill, development in the setting of the SDNP (on lower ground) would not block views, however, the appeal scheme would inevitably have an adverse effects on the quality of views towards the sea by effectively infilling a substantial part of the break in built form to the north of the railway line. The High Court Judgment (CD L2) states that the Inspector “*failed to give any weight to the moderate adverse effects he had found, which was in breach of the policy requirement in paragraph 176 of the Framework (now paragraph 182) to give them “great weight”*” (paragraph 155).

- 7.3.3 The Inspector also gave his judgements on the effects of the proposed development on localised views, in particular those from the A259 Littlehampton Road, Goring Street, public footpaths 2121 and 2121\_1 and the railway station footbridge. In terms of the A259 Littlehampton Road, the Inspector stated “*I agree with the Council that the proposal would result in a high magnitude of change at this location and consider the overall effect would be substantial adverse*” (paragraph 53 of CD L1). However, in views from Goring Street, the Inspector concludes “*the effect on visual receptors at this location would be moderate adverse*” (paragraph 51).
- 7.3.4 I have difficulty reconciling these two judgements, and have assessed the significance of effect on views from both the A259 Littlehampton Road and Goring Street to be Substantial Adverse. The Inspector was in agreement that “*the site is clearly visible from parts of Goring Street*” but then considered that “*views are filtered in parts by existing vegetation*” (paragraph 51). He then concluded that “*while some views would become more open, particularly near the proposed access, the retention of existing vegetation and proposed new tree planting along the eastern boundary of the site would continue to act as an effective filter*”.
- 7.3.5 I can appreciate that existing vegetation along the eastern edge of the field to the north of the appeal site would screen views of the site from the northern end of Goring Street, however, where the site is contiguous with Goring Street, it is proposed that any existing vegetation along the site frontage would be removed to create the new roundabout to access the site. Therefore, at the time of construction, no existing vegetation would be retained and the proposed new tree planting would so immature as to be ineffective as a filter to views of the site from Goring Street. The description the Inspector used for views from the A259 Littlehampton Road could be equally applied to those from Goring Street, in that “*views would materially alter, becoming far more urbanised and extending the settlement further north and west*” (paragraph 52). Close proximity views from Goring Street of the open, agricultural appeal site would be markedly changed with the introduction of the built form of the proposals, and this high magnitude of change would result in a Substantial Adverse significance of effect.

7.3.6 Other than the disagreement with the Council’s assessment of effects on views from Goring Street, the Inspector did agree with the Council’s assessment that “*the impact on receptors travelling along Littlehampton Road, users of public footpaths 2121 and 2121\_1 (as well as those users of the more informal routes across the site) and those using the nearby railway bridge would be substantial adverse*” (paragraph 56).

7.3.7 The following table sets out the predicted effects of the proposed development on public visual receptors (with my judgements in green and Mr Self’s judgements in orange):

Table 4: Summary of Visual Effects

Visual Receptor/ Viewpoint Location	Sensitivity	Construction		15 Years Post Completion	
		Magnitude of Change	Effects	Magnitude of Change	Effects
A259 Littlehampton Road – Pedestrians/ Cyclists	Medium/High	High	Substantial Adverse	Medium	Moderate Adverse
A259 Littlehampton Road – Pedestrians/ Cyclists	Medium	Moderate	Moderate Adverse	Moderate	Slight Adverse
A259 Littlehampton Road - Motorists	Medium	High	Substantial Adverse	Medium	Moderate Adverse
A259 Littlehampton Road - Motorists	Low	Moderate	Moderate/ Slight Adverse	Moderate	Slight/ Negligible Adverse
Goring Street - Pedestrians/ Cyclists	Medium/High	High	Substantial Adverse	Medium	Moderate Adverse
Goring Street - Pedestrians/ Cyclists	Medium	Moderate	Moderate Adverse	Moderate	Slight Adverse
Goring Street - Motorists	Medium	High	Substantial Adverse	Medium	Moderate Adverse
Goring Street - Motorists	Low	Moderate	Slight Adverse	Moderate	Slight/ Negligible Adverse
Public footpaths 2121 and 2121_1	High	High	Substantial Adverse	High	Substantial Adverse
Public footpaths 2121 and 2121_1	Medium	Substantial	Moderate Adverse	Substantial	Moderate Adverse
Coastal railway line	Medium	Medium	Moderate Adverse	Medium	Moderate Adverse

Visual Receptor/ Viewpoint Location	Sensitivity	Construction		15 Years Post Completion	
		Magnitude of Change	Effects	Magnitude of Change	Effects
Coastal railway line	Low	Moderate	Slight Adverse	Moderate	Negligible Adverse
Goring-by-Sea railway station footbridge	Medium	High	Substantial Adverse	High	Substantial Adverse
Goring-by-Sea railway station footbridge	Low	Moderate	Slight Adverse	Moderate	Slight Adverse
Singleton Crescent and Chatsmore High School	Medium/High	Low	Minor Adverse	Low	Minor Adverse
Singleton Crescent and Chatsmore High School	Medium	Negligible	Negligible Adverse	Negligible	Negligible Adverse
Ferring Lane and Green Park - Pedestrians	Medium/High	Low	Minor Adverse	Low	Minor Adverse
Ferring Lane and Green Park - Pedestrians	Medium	Negligible (Ferring Lane)	Negligible Beneficial	Negligible (Ferring Lane)	Negligible Beneficial
		Slight (Green Park)	Slight Adverse	Slight (Green Park)	Slight/Negligible Adverse
Highdown Rise	High	Medium	Substantial Adverse	Medium	Substantial/Moderate Adverse
Highdown Rise	High	Moderate	Moderate Adverse	Moderate	Slight Adverse
Highdown Gardens	High	Very Low	Negligible	Very Low	Negligible
Highdown Gardens	High	Negligible	Negligible Adverse	Negligible	Negligible Adverse
Highdown Hill	Very High	Medium	Substantial Adverse	Medium	Substantial Adverse
Highdown Hill	High	Moderate	Moderate Adverse	Moderate	Slight Adverse
Footpath 2139 and Restricted Byway 2139_4	High	Medium	Moderate Adverse	Medium/Low	Moderate/Minor Adverse
Footpath 2139 and Restricted Byway 2139_4	High	Moderate	Moderate Adverse	Moderate	Slight Adverse

Visual Receptor/ Viewpoint Location	Sensitivity	Construction		15 Years Post Completion	
		Magnitude of Change	Effects	Magnitude of Change	Effects
Public open space on Honeysuckle Lane, High Salvington	High	Medium/Low	Moderate/ Minor Adverse	Low	Minor Adverse
Public open space on Honeysuckle Lane, High Salvington	High	Negligible	Negligible Adverse	Negligible	Negligible Adverse
Cissbury Ring	Very High	Very Low	Minor Adverse	Negligible	Negligible
Cissbury Ring	High	Negligible	Negligible Adverse	Negligible	Negligible Adverse

## 8 LANDSCAPE AND VISUAL ASSESSMENT OF THE APPEAL PROPOSALS ON THE CHATSMORE FARM LOCAL GREEN GAP

### 8.1 Introduction

8.1.1 The Chatsmore Farm Local Green Gap (LGG), as defined in Policy SS5 of the WLP 2023 (CD E35, pages 59 and 60), is the more northerly of the two identified gaps between Goring-by-Sea and Ferring (the southerly one being the Goring-Ferring Gap). In addition to the appeal site, the Chatsmore Farm LGG includes two adjacent fields; the field to the north of Ferring Rife and the field beyond the south-west corner of the appeal site, within Arun District. In combination, the appeal site and these two adjacent fields form about 30ha of an open, arable landscape, with no significant upstanding internal divisions, which provide the setting to the northern extents of the two, existing settlements of Goring-by-Sea and Ferring, and to the SDNP to the north of the A259. The appeal site occupies about two-thirds of the area of the gap (20ha, though 10.2ha is proposed as built form, excluding site access roads). The field beyond the site's south-west corner (within Arun District) is designated as a gap in the Arun Local Plan 2018 (Policy SD SP3: Gaps Between Settlements).

8.1.2 The Inspector's report (CD E37) into the WLP 2023 clearly defined the purpose of the LGGs *"to help maintain the physical and visual separation of settlements and to preserve the separate characters and identities of Worthing as distinct from Adur and Arun"* (paragraph 55). These objectives are reiterated in the supporting text in the WLP 2023 (CD E35) for Policy SS5, which states *"the designation and protection of 'Local Green Gaps' helps to avoid coalescence and preserve the separate characters and identities of different settlements by providing physical and visual breaks. This is particularly important*

*given the compact nature of Worthing and how few and fragile the breaks in development are on the coastal strip between Brighton and Chichester*” (paragraph 3.50). Paragraph 3.52 of the Local Plan explains that the four designated gaps “are open and either undeveloped or a managed landscape for recreational use. They create a sense of travelling between urban areas and form a critically important component of Worthing’s landscape setting”.

8.1.3 Access to and appreciation of the Chatsmore Farm LGG is possible from Footpath 2121, which forms a well-used route between the settlements along the southern boundary of the appeal site, and from Footpath 2121\_1, which adjoins part of the site’s western boundary. The physical and visual sense of the gap and the appeal site’s contribution to separation between settlements is not only evident from these adjacent footpaths, but also from the A259 Littlehampton Road, and “*when viewed from the SDNP and Highdown Hill looking down the slope into Worthing*” (paragraph 61 of the LP Inspector’s report, CD E37). From these elevated viewpoints, the appeal site forms a substantial part of the open landscape in the mid-ground and contributes to the clear perception of a gap between the two settlements to the north of the railway.

8.1.4 It was suggested by the Inspector of the previous appeal (CD L1, paragraph 42), that by locating proposed built form towards the southern end of the site, the scheme would not undermine the physical or visual separation of the settlements. I disagree with this comment. In my view, the proposed development of up to 475 dwellings and associated infrastructure would plainly undermine the physical and visual separation of the settlements. This would be particularly noticeable from the footpaths within and adjoining the site, from the A259 at Goring Street, and Littlehampton Road; the railway footbridge and from the SDNP, given that in views from Highdown Hill (particularly near the covered reservoir), it is the southern part of the appeal site that is most visible, with the railway providing a strong boundary between the contrasting land uses of arable field and urban edge, particularly where this is defined by the tall apartments along Bluebell Way.

8.1.5 The Appellant considered that “*benefits will also arise from the undergrounding of the overhead power cables*” (CD C5/B1, paragraph 1.8), and whilst this would be beneficial to those receptors where the overhead powerlines are seen against the sky, the benefits reduce where they are viewed from the elevated SDNP, as the powerlines are backgrounded by the site and settlement beyond. Any benefits of removing the powerlines would not be outweighed by the landscape and visual harm caused by the scale of development of up to 475 houses.

8.1.6 Indeed, I find some of the previous Inspector’s findings difficult to reconcile. For example, on the one hand, he found the following:

- *“that the appeal site consists of a physical ‘gap’ between the settlements (Goring-by-Sea and Ferring), and appears as a break in the surrounding development”* (CD L1, paragraph 38);
- *“particularly in view of the development which had, at that time (in the 1950s), already occurred south of the railway”* (paragraph 40);
- He recognised, in the light of previous appeals, *“the importance of the gap in the overall structure of the urban area”* (paragraph 41);
- *“it is clear that the introduction of the proposed scheme would have an urbanising effect on the site itself and would diminish the sense of separation between Goring-by-Sea and Ferring”* (paragraph 42);
- That *“the proposal would develop a significant portion of the proposed gap and reduce the visual separation of the settlements”* (paragraph 27);
- *“that views from Littlehampton Road would be more affected”* (paragraph 52), and *“that the proposal would result in a high magnitude of change at this location and consider the overall effect would be substantial adverse”* (paragraph 53);
- *“there are open, uninterrupted views across the site towards the SDNP and Highdown Hill from the public footpaths (and more informal routes crossing the site) as well as from the nearby railway bridge”, and users of these paths would “enjoy the more quiet and tranquil nature of the site and its attractive surroundings, which provides a considerable sense of relief from the nearby built-up areas”* (paragraph 54).

8.1.7 Yet on the other hand, the previous Inspector found that the scheme would not undermine the physical or visual separation between Goring-by-Sea and Ferring (paragraphs 42 and 57). I struggle to understand how a scheme that would develop a significant part of the gap, reduce the visual separation of the settlements, diminish the separation and have substantial adverse impacts on drivers and pedestrians between Goring-on-Sea and Ferring could be found not to undermine the physical and visual separation between the settlements. I note that at the time of his decision, the Worthing Local Plan was not yet adopted and the Inspector noted that its wording was subject to proposed amendments that had not yet been subject to consultation. In those circumstances, he found that there was some *“potential conflict”* with Policy SS5 but attributed that conflict only limited weight (paragraph 83). That policy has now been adopted and, in my view, the appeal scheme is in clear conflict with it.

8.1.8 Although settlement exists to the south of the railway, this is predominantly low density bungalows, set in generously-sized plots, whose garden planting has been long-established, and is seen in conjunction with the openness afforded by the school playing fields. The WLP Inspector also considered the following at paragraphs 60 and 61 of his report (CD E37):

60. *“In terms of the specific designations, and with reference to a proposal for housing development not included in the plan (i.e., the appeal scheme), it was put to me that the Chatsmore Farm does not function as a ‘gap’ and is rather an indentation in an otherwise continuous pattern of development. It is true to say that between the proposed Chatsmore Farm and Goring-Ferring gaps there is a block of*



*development which already joins Goring and Ferring, with housing estates and a school located either side of Goring Way. Notwithstanding this, the western gaps clearly provide breaks in the built form and help prevent the sense that the two areas have merged completely or lost their own identities”.*

61. *“This is particularly the case for Chatsmore Farm when viewed from the SDNP and Highdown Hill looking down the slope into Worthing..... The built form which segregates the gaps is not the dominant feature in these views and is also absorbed to an extent by landscaping. The predominant sense when viewing the gaps is one of relief from the continuous built form running east to west”.*

## **8.2 Assessment of the Proposals against the Criteria in Policy SS5**

8.2.1 Countryside and gap policies are not intended to impose a blanket restriction on all development and in this respect, Policy SS5 provides four criteria against which all applications for development (including entry level exception sites) would be assessed. Below, I set out my assessment of the appeal proposals against each of these criteria.

8.2.2 Criterion i) *It would not undermine the physical and/or visual separation of settlements.* The appeal site, by virtue of its large size (about 20ha), and the fact that it comprises the majority of the geographical extent of the Chatsmore Farm Gap, makes an important contribution to the physical and visual separation of settlements. Due to the site’s openness, the gap can be easily appreciated from footpaths around the perimeter of the site, from the A259 to the north of the site and from elevated viewpoints within the SDNP. It is proposed that over 10ha of the 30ha of the defined gap would be built form, and it is this built form that would be the key aspect to undermine the physical and visual separation of settlements. Although less than 10ha of the appeal site would not be built on, there would still be some form of development on the non-developed land, as it would comprise open space uses. These open spaces, despite proposals for naturalistic-looking planting, would include play areas, SuDS features, etc., which would introduce potentially urbanising elements, such that the non-built spaces would be very different in appearance to the retained arable field to the north of Ferring Rife.

8.2.3 Criterion ii) *It would not compromise the integrity of the gap.* Given the scale of the proposals (for 475 dwellings on 10.2ha of highly visible, currently open land), the appeal scheme would develop a significant part of the gap, seriously compromising the gap’s integrity. In previous studies undertaken for the Council as part of the evidence base for the Local Plan (CD G7 and CD G8), it was suggested that some parts of the appeal site may be of a higher suitability for housing development (i.e., the south-west corner of the appeal site, defined as the less visually prominent Zone B, together with the field to the west in Arun District) than the majority of the appeal site (Zone A). In the 2015 study (CD G7), Zone B was assessed as having Low landscape, visual and ecological suitability for development, whereas Zone A was assessed as having Negligible/Low suitability (CD G7, page 81, Figure 26). Of the eight sites assessed, only the Goring-Ferring Gap had less suitability for development. As stated in the 2015 study *“Development in these*

areas would have a significant and detrimental effect on the character of the landscape as a whole and/or on separation between settlements, the setting to existing settlement or the South Downs National Park” (page 80, paragraph 6.3). In the 2017 ‘Further Review of Low Suitability Sites’ (CD G8), Site 5A continued to be assessed as having Negligible/Low suitability for development. The 2017 study also considered the field within Arun District as Site 5C (Green Park), together with Sites 5A and 5B. Sites 5B and 5C were assessed as having Moderate suitability for development but only by taking into account the green infrastructure proposals, and looking at Sites 5B and 5C in combination as an extension to Ferring. However, this study was completed prior to the adoption the Arun District Local Plan (2018), in which Site 5C is designated as a gap, making the development of Site 5B on its own untenable. I therefore conclude that the development of the appeal site for up to 475 houses, or even a smaller scale scheme, would compromise the integrity of the gap.

8.2.4 Criterion iii) *It conserves and enhances the benefits and services derived from the area’s Natural Capital.* The designated gaps provide several benefits, as recognised by the LP Inspector, such as “undeveloped land for wildlife, recreation, food production or improving public access to the countryside” (CD E37, paragraph 56). The LP Inspector considered in the case of Chatsmore Farm that “the local community benefits from the access it provides to the open countryside, the value to the character of the area by providing welcome physical relief from a fairly dense built-up area. It also allows the countryside to penetrate south of the A259” (paragraph 281). In terms of its Agricultural Land Classification, the appeal site comprises Best and Most Versatile Land, being Grade 1 and/or Grade 2. The public footpaths along the southern and western boundaries are supplemented with informal paths to either side of Ferring Rife, providing well-used circular routes via the footways alongside the A259 to the north and east. These routes provide residents in the adjacent settlements with easy and immediate access to countryside, and the current openness of the site allows unhindered views to the rising land of the SDNP. Whilst the Concept Masterplan (CD A22) proposes regularisation and augmentation of the existing informal paths along Ferring Rife within the proposed open space, the experience and views would be markedly different from the current situation. The views to the north would remain, but the openness and feeling of space experienced when looking south from Ferring Rife would be encroached upon by proposed built form. Open views from Footpath 2121 of the SDNP would be significantly reduced, with views primarily of built form, on both sides of the footpath, without relief from the continuous built-up area. The proposed development would thus result in the loss or deterioration of most of the benefits derived from the area’s Natural Capital.

8.2.5 Criterion iv) *It conserves and enhances the area as part of a cohesive green infrastructure network.* The appeal site works in conjunction with the retained arable field to the north of Ferring Rife and the field to its west (in Arun District) as a large, open swathe of countryside.

This swathe links visually northwards across the A259 Littlehampton Road into the SDNP, comprising the arable field to the east of Highdown Rise and the woodland belts around the playing fields to the south of Highdown Gardens, and culminates in the National Trust's land at Highdown Hill. The LP Inspector found that the appeal site, together with the other two fields comprising Chatsmore Farm "*has the appearance of (an) unbroken area of open agricultural countryside*" (CD E37, paragraph 283). There are also visual links with the Goring -Ferring Gap to the south, particularly from the SDNP. The appeal scheme would undoubtedly fail to conserve or enhance the site which currently forms part of a cohesive green network to the west of Worthing. Although the railway and A259 Littlehampton Road form physical barriers to the migration of some wildlife, and the arable use of the appeal site limits its biodiversity value, it does, by virtue of its size, provide benefits to wildlife. For example, heron fish from the banks of Ferring Rife, but if built development were to encroach closer to this watercourse, it is likely that the additional disturbance would deter them.

## **9 REVIEW AGAINST LANDSCAPE ASPECTS OF PLANNING POLICY**

### **9.1 Introduction**

9.1.1 The evidence of Mr Carpenter addresses the planning policy context relevant to the appeal site and whether the proposals are contrary to those policies. Of particular relevance to the landscape aspects of policy pertaining to these proposals is the importance placed upon new development being in keeping with the existing landscape character of the area and the effects on the amenity of visual receptors.

### **9.2 National Planning Policy Framework**

9.2.1 In the assessment I have undertaken within this Proof, I have demonstrated that the proposals would not conform to the Framework, as they would not be "*sympathetic to local character and history, including the surrounding built environment and landscape setting*" (Paragraph 135c) of the Framework – CD D7). The site does not lie within an area designated for its landscape quality, however, it lies within the setting of the nationally designated SDNP, being 95m from its boundary.

9.2.2 Paragraph 182 of the Framework states that development within the setting of NPs "*should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas*". The photomontages provided by the Appellant for Viewpoints 20 and 21 (CD A11), clearly demonstrate how the appeal proposals would introduce dominating urban development in the mid-ground of the views from Highdown Rise and Highdown Hill. Despite the Appellant's contention that the appeal proposals could be sensitively located and designed, my view is that the appeal site is too sensitive a location for the proposed development, given the important role it plays in a key view from Highdown Hill – a view which is described in the View Characterisation Study (CD G6) as representative of the

breath-taking views that constitute one of the SDNP's special qualities. I consider that the proposals give rise to harm to the landscape and scenic beauty of the SDNP. Both parties agree that there would at least be some harm to the setting of the SDNP. The weight to be afforded to that harm is explained in the evidence of Mr Carpenter.

9.2.3 The site lies within the countryside, and whilst it is a featureless, arable field that could not be considered as scenically beautiful, its value is derived from its openness and its rarity, in the contrast the site provides to the almost continuous development along the coastal plain. It is common ground between the parties that the appeal site does not constitute a valued landscape in the sense of the Framework (Paragraph 180a), however the site warrants protection as its loss would result in further settlement coalescence and the loss of separate settlement identity. The value of the site's contribution to the gap has been recognised through its designation in the recently adopted Local Plan.

### **9.3 Local Policy**

9.3.1 I do not consider that the proposals would be consistent with Worthing Local Plan 2023 policies that relate to the landscape character and the effects on the amenity of visual receptors. In terms of adopted policy, the site is contrary to the following policies:

9.3.2 Local Plan Policy SS4: Countryside and Undeveloped Coast: The site would be outside the Built-Up Area Boundary, and thus would be within the Countryside. The proposed development does not require a countryside location.

9.3.3 Local Plan Policy SS5: 'Local Green Gaps'. This policy identifies the site as part of one of four Local Green Gaps and restricts development within those areas in order to retain the separate identities and character of Goring-by-Sea and neighbouring settlements. Section 8 of my proof addresses the landscape and visual impacts of development on the Chatsmore Farm Gap and each of the criteria in Policy SS5. In summary, the scale and location of the proposed development would undermine the physical and visual separation between Goring-by-Sea and Ferring. The development's compliance with Policy SS5 was a principal controversial issue between the parties at the previous appeal. Now that Policy SS5 has been adopted, some of the Council's arguments, such as prematurity, have fallen away, but the fundamental objection remains, that the proposed development would, in effect, join the western edge of Goring-by-Sea with the northern extent of Ferring, thus compromising the integrity of the gap between settlements and substantially diminishing the separate identities of the two communities.

## **10 SUMMARY AND CONCLUSIONS**

10.1.1 My evidence addresses the potential landscape and visual effects of the appeal proposals which are for 475 dwellings and a local centre on 20ha of land between the settlements of

Goring-by-Sea and Ferring. Although the site is not located within the nationally designated landscape of the SDNP, it is within its setting (there is only 95m between the site boundary and the boundary of the SDNP, which lies along the northern edge of the A259 Littlehampton Road). The site also lies within a Local Green Gap (as defined by Policy SS5 of the WLP 2023), which is locally recognised for maintaining the physical and visual separation of Goring-by-Sea and Ferring, thus preserving their separate characters and identities. There are also no ecology or heritage designations within or adjacent to the site. The site is publicly accessible, with Public Footpaths along its southern and western boundaries, as well as other footways along Goring Street (forming the eastern site boundary), which provide walkers with open views of the site and of the elevated landform of the SDNP.

10.1.2 The site lies outside the Built Up Area Boundary (as defined by Policy SS1 of the WLP 2023) and thus is within 'countryside' (as defined by Policy SS4 of the WLP 2023). The site comprises a single, arable field, that slopes indiscernibly to its north (towards the watercourse of Ferring Rife at 4m AOD), with marginally higher ground across the southern part of the site (to 7m AOD). The site is visually contained to its west, south and east by existing development but is open to its north towards the SDNP.

10.1.3 In terms of published landscape character assessments for the area, the site lies on the South Coast Plain (at the national scale – NCA126), within the 'Littlehampton and Worthing Fringes' (at the county level – LCA SC11) and on the 'Goring Coastal Plain' (at the borough level). The site possesses some of the key characteristics listed in these assessments (but is most notable as a narrow gap of open land which provides views to the sea and separation between the urban areas, as described for LCA SC11). Despite the site's proximity to the heavily trafficked A259 (to the north and east), and its intervisibility with adjacent suburban housing, these do not have a substantive influence on the perceptual aspects of the site. Urban influences are diluted by the overall size of the gap, comprising the site in combination with open fields to its north and west (minimum dimensions of 460m north to south and 630m west to east). Although the site and wider landscape possess some features which detract from their quality (overhead power lines), the influence of the rising ground within the SDNP elevates the overall quality of the area.

10.1.4 The site does not lie within the designated landscape of the SDNP, however is heavily influence by it, therefore I agreed with the Council's/Mr Duckett's previous assessment of landscape sensitivity for the site and the field to its north of High/Medium. I also agree with the landscape sensitivity assessment for the land to the north of the A259 (thus within the SDNP, though within LCA SC11), at High, and the more elevated land within LCA SC12 at Very High (the latter was also agreed by the appellant). I concur with the two previous assessments on the landscape sensitivity of the adjacent townscape at Medium to the type

of development proposed. It is common ground between the parties that the site is not a 'valued landscape' for the purposes of Paragraph 180a) of the Framework.

- 10.1.5 In visual terms, the site has a limited visual envelope, except to its north. Views from within the adjacent settlements are restricted by intervening houses on the settlement edge, particularly along the A259 to the east. The paucity of boundary vegetation allows open views into the site, particularly from within the SDNP. The elevated viewpoint of Highdown Hill is 960m from the site boundary, but allows open, panoramic views across the appeal site in the mid ground, and beyond to the sea. The significance of effect from this viewpoint was previously assessed by Mr Duckett as Substantial Adverse, with which I agree. I do not agree with the previous Inspector's conclusion that "*the level of harm (to the SDNP) would be moderate adverse and not significant*" (CD L1, paragraph 47). I note that the High Court judgement found that the Inspector "*failed to give any weight to the moderate adverse effects he found, which was in breach of the policy requirement in paragraph 176 of the Framework to give them 'great weight'*" (CD L2, paragraph 155).
- 10.1.6 The potential effects associated with the proposed development would primarily be localised (except for effects on SDNP), though permanent. Whilst the loss of key landscape features would be limited to the removal of about 175m length of perimeter vegetation to create the new site access onto Goring Street, it is loss of the open arable field of the site that would be the biggest change (given the large scale of loss). The appellant suggests that the loss of a featureless field and its replacement with a (high-quality) residential development interspersed with public open space and green infrastructure would be in keeping with adjacent urban areas. But the value of the site is elevated by the fact that such open spaces between settlements are exceptionally rare in this part of the coastal plain and the respite they provide from the almost continuous urban form would be permanently lost affecting the separate identities of settlements. There is no doubt that there could be an overall increase in features that are characteristic of the higher quality landscapes to the north of the site with the implementation of the proposed development, and an uplift in biodiversity, but this would be at the expense of a greenfield site that performs a valuable function in preventing the further coalescence of settlements.
- 10.1.7 It is assessed that the proposed development would result in substantial adverse landscape and visual harm, and whilst this harm would be localised, the openness of the site means it would be easily perceived, not only from perimeter footpaths and roadways through adjacent urban development, but also from the elevated landscape to the north within the SDNP, within the setting of which the site lies. The residual landscape effects would remain, as the loss of the gap would be permanent.

11 REFERENCES (as extracted from Core Document List)

Core Doc Ref	Core Document Author, Date and Title
A4	Thrive Architects for Persimmon Homes Thames Valley (August 2020) ' <i>Design &amp; Access Statement</i> '
A11	CSA Environmental for Persimmon Homes Thames Valley (July 2020) ' <i>Landscape and Visual Impact Assessment</i> ' (Extracts at <b>Appendix A</b> )
A22	Thrive Architects for Persimmon Homes Thames Valley (July 2020) ' <i>Concept Masterplan, Dwg No CWP-02 Rev P6</i> '
C5/B1	Mr Clive Self of CSA Environmental (December 2021) ' <i>Appellant's Landscape Proof of Evidence</i> '
C5/B2	Mr Clive Self of CSA Environmental (December 2021) ' <i>Appellant's Landscape Proof of Evidence – Appendices</i> '
C6/B	Mr Brian Duckett of HDA (December 2021) ' <i>LPA Landscape Proof of Evidence</i> '
D2	Department for Communities and Local Government (launched March 2014 and subsequent updates) ' <i>National Planning Practice Guidance</i> '
D7	Ministry of Housing, Communities and Local Government (December 2023), ' <i>National Planning Policy Framework</i> '
E1	Worthing Borough Council (adopted April 2011) ' <i>Worthing Core Strategy</i> '
E2	Worthing Borough Council (January 2021) ' <i>Emerging Worthing Local Plan – Submission Draft</i> '
E8	Worthing Borough Council (2003) ' <i>Saved Policies of the Worthing Local Plan</i> '
E35	Worthing Borough Council (adopted 28 March 2023) ' <i>Worthing Local Plan 2020-2036</i> ' (Extracts at <b>Appendix C</b> )
E37	Steven John Lee for The Planning Inspectorate (14 October 2022) ' <i>Report on the Examination of the Worthing Local Plan 2020-2036</i> '
G1	The Landscape Institute with the Institute of Environmental Management and Assessment, (2013), " <i>Guidelines for Landscape and Visual Impact Assessment</i> " (third edition)
G2	Natural England (October 2014), ' <i>An Approach to Landscape Character Assessment</i> '
G3	Natural England (24 February 2014) ' <i>National Character Area Profile No 126: South Coast Plain</i> ' (NE525) (Extracts at <b>Appendix E</b> )
G4	West Sussex County Council (2003) ' <i>West Sussex Landscape Character Assessment</i> ' (Extracts at <b>Appendix F</b> )
G5	South Downs National Park Board (updated 2011) ' <i>South Downs Integrated Landscape Character Assessment</i> '
G6	South Downs National Park Board (2015) ' <i>View Characterisation and Analysis</i> ' (Extracts at <b>Appendix K</b> )
G7	HDA for Worthing Borough Council (and Adur Council) (November 2015) ' <i>Landscape and Ecology Study of Greenfield Sites in Worthing Borough</i> ' (Extracts at <b>Appendix H</b> )
G8	HDA for Worthing Borough Council (and Adur and Arun Councils) (July 2017) ' <i>Landscape and Ecology Study of Greenfield Sites in Worthing Borough – Review of Low Suitability Sites</i> ' (Extracts at <b>Appendix J</b> )
G9	HDA for Worthing Borough Council (July 2007) ' <i>Worthing Gap and Landscape Capacity Study</i> ' (Extracts at <b>Appendix G</b> )

Core Doc Ref	Core Document Author, Date and Title
<b>K6</b>	Mr Self and Mr Duckett (26 January 2022) ' <i>Comparison of Landscape and Visual Judgments</i> ', based upon revised Appendix H of the Mr Self's Landscape Proof of Evidence
<b>L1</b>	Rory Cridland for The Planning Inspectorate (25 February 2022) ' <i>Appeal Decision APP/M3835/W/21/3281813 – Land North West of Goring Station, Goring-by-Sea, Worthing</i> '
<b>L2</b>	High Court of Justice before Mrs Justice Lang DBE (1 August 2022) ' <i>Approved Judgment, Case No: CO/1221/ 2022</i> '



**HDA Document Control and Quality Assurance Record**

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(Chatsmore Farm, Worthing LS)

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4			

	Personnel	Position
Author	Christine Marsh	Associate
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**LAND NORTH WEST OF GORING STATION, GORING-BY-SEA, WORTHING  
(REDETERMINATION)**

**Landscape Proof of Evidence - APPENDIX A**

**of**

**Christine Marsh – BA(Hons), Dip LA, CMLI**

**of**

**Hankinson Duckett Associates**

**for**

**Worthing Borough Council**

**REFER TO SEPARATE PDF FILE**

**APPENDIX A  
EXTRACTS FROM LANDSCAPE AND VISUAL IMPACT ASSESSMENT  
BY CSA ENVIRONMENTAL FOR PHTV  
APPENDICES A TO F AND APPENDIX I  
JULY 2020**

Appendix A



**LAND NORTH WEST OF GORING STATION, GORING-BY-SEA, WORTHING  
(REDETERMINATION)**

**Landscape Proof of Evidence - APPENDIX B**

**of**

**Christine Marsh – BA(Hons), Dip LA, CMLI**

**of**

**Hankinson Duckett Associates**

**for**

**Worthing Borough Council**

**APPENDIX B  
HDA LVIA METHODOLOGY**

Appendix B

## APPENDIX B

### HDA LVIA METHODOLOGY

#### 1.1 Guidance

1.1.1 The proposed development is not subject to the Town and Country Planning (Environmental Impact Assessment) (England) Regulations (2017<sup>1</sup>), which implement EC Directive 2011/92/EU.

1.1.2 The methodology used in preparing this Landscape and Visual Appraisal has been developed by HDA from guidance given in the following documents:

- The Landscape Institute with the Institute of Environmental Management and Assessment, (2013), “*Guidelines for Landscape and Visual Impact Assessment*” (third edition) (GLVIA);
- Natural England (October 2014), “*An Approach to Landscape Character Assessment*”; and
- Countryside Agency (now Natural England) and Scottish Natural Heritage (by Carys Swanwick and Land Use Consultants), (April 2002), “*Landscape Character Assessment – Guidance for England and Scotland*”.

1.1.3 The assessment of likely impacts is considered in two separate, but inter-linked, parts defined within GLVIA (page 21, para 2.21) as follows:

***Assessment of landscape effects:** assessing effects on landscape as a resource in its own right;*

***Assessment of visual effects:** assessing effects on specific views and on the general visual amenity experienced by people.’*

#### 1.2 Process

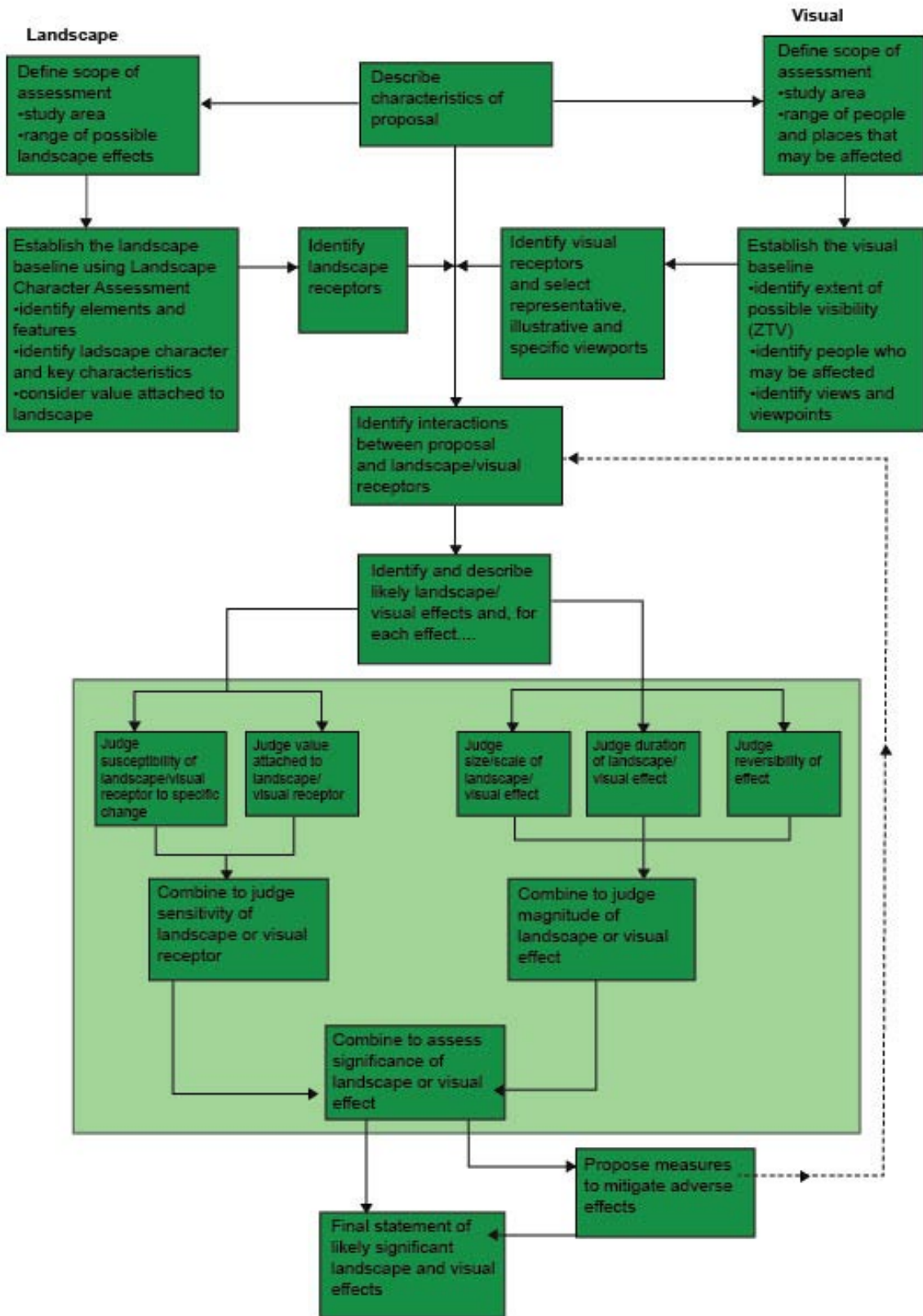
1.2.1 The iterative process undertaken through the course of a Landscape and Visual Impact Assessment is illustrated in Figure 1.

1.2.2 The level of detail included within a report will be proportionate to the anticipated extent of potential impacts caused by the proposed development and is also likely to vary between a full LVIA chapter and a more concise Landscape and Visual Appraisal (LVA). Within an EIA compliant LVIA, the assessment section of the report (shown as a pale green box in Figure 1), would provide details of the relative judgement on sensitivity, magnitude of change and would provide an assessment on the significance of effects of the development on various features, character areas and views. A Landscape and Visual Appraisal (LVA) of a small development is likely to cover the key effects but not include any detailed references to judgements on significance.

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<sup>1</sup> Statutory Instrument No 571, published by the Department of Housing, Communities and Local Government

**Figure 1: Steps in assessing landscape and visual effects.**



Referenced from figures 5.1 and 6.1 in GLVIA (Ref.2)

### **1.3 Desk Study**

1.3.1 A desk-study is undertaken to establish the physical components of the local landscape and to identify the boundaries of the study area. The following data sources were consulted:

- Ordnance Survey (OS) maps – (a range from 1:12,500 to 1:2,000) to identify local features relating to topography, field pattern/shape/size, drainage pattern, woodland cover, existing settlement pattern, rights of way network, transport corridors and any important extant historic features.
- Vertical aerial photography – used to supplement the OS information.

1.3.2 This data informs the field survey by providing a basis for mapping landscape features and to indicate the likely visibility of the proposed development.

1.3.3 Topographical analysis is used to identify the extent of potential visibility of the site and the proposed development. The zone of theoretical visibility is identified through mapping, together with potential visual receptors (VRs), for verification by field survey. The VRs include locations with public access within the visual envelope; public rights of way, public open space, key vantage points, roads, etc. together with residential properties and workplaces.

1.3.4 Natural England's National Character Area Profiles, together with local landscape character assessment, provide the landscape character context.

1.3.5 The current landscape planning context for the site is provided by the development plan documents for Worthing Borough Council.

### **1.4 Field Survey**

1.4.1 Updates to the field survey of the site were carried out in October 2022 and January 2023. This involved walking the site and travelling extensively through the local area, the extent of the study area being identified in the desk-study, to verify any variations in landscape character and the locations of visual receptors. The field survey also served to understand the immediate setting of the proposed development, including the local topography, existing land uses and vegetation structure, position and condition of trees, hedgerows and stream courses.

1.4.2 The site visit was undertaken from publicly accessible viewpoints around the site such as roads and public rights of way. Intervisibility analysis (projective mapping) was used to verify the zone of theoretical visibility and to evaluate the extent and nature of views from nearby properties (properties were not visited as part of the study). A working photographic record of the visit was also made.

## **1.5 Establishing the Baseline**

1.5.1 In order to form a comprehensive assessment of the effects of a proposed development, the existing situation, or baseline condition, must be established. The proposed changes resulting from the proposed development can then be identified and described. As described in section 1.1.3, the assessment considers the landscape and visual effects of the proposals.

1.5.2 GLVIA describes the landscape and visual baseline as follows:

- *‘For the landscape baseline the aim is to provide an understanding of the landscape in the area that may be affected – its constituent elements, its character and the way this varies spatially, its geographic extent, its history, its condition, the way the landscape is experienced, and the value attached to it.*
- *For the visual baseline the aim is to establish the area in which the development may be visible, the different groups of people who may experience the views of the development, the places where they will be affected and the nature of the views and visual amenity at those points.’* (page 32, paragraph 3.15)

## **1.6 Landscape Baseline**

1.6.1 For the purposes of assessment, the landscape resource is considered in two ways:

1. Local landscape character variation across the site and Study Area is described and evaluated; and
2. Existing landscape features in and immediately adjacent to the site are identified, quantified and their condition assessed.

1.6.2 The objective of the landscape baseline is first to schedule, describe, and where possible, quantify the landscape resource that potentially could be affected by the proposed development. A judgement is then made as to the Landscape Value of the Study Area.

### **Landscape Sensitivity**

1.6.3 Landscape sensitivity is defined as:

*‘a term applied to specific receptors, combining judgements of the susceptibility of the receptor to the specific type of change or development proposed and the value related to that receptor’* (GLVIA, page 158)

1.6.4 The susceptibility of the landscape to change is *‘the ability of the landscape receptor to accommodate the proposed development without undue consequences for the maintenance of the baseline situation and/or the achievement of landscape planning policies and strategies’* (GLVIA, page 89, paragraph 5.40)

1.6.5 The way that landscape responds to or is affected by proposed development is determined in part by the nature of that development. The sensitivity of the landscape will vary depending on the type, form, appearance, extent or scale, duration (temporary or permanent) and phasing of proposed development. Landscape effects are also dependent

upon the ‘degree to which the proposals fit with existing character’ (GLVIA, page 88, para 5.37), or indeed the potential to design-out potential adverse effects. Outline information about the proposed development, such as type and scale, helps inform preliminary judgement about the relative susceptibility of the landscape. However, the final judgement on susceptibility may change from the preliminary assessment as the scheme’s detail design evolves in parallel with EIA (an iterative process). Natural England’s advice note on ‘Assessing Landscape and Visual Sensitivity’ (2019), provides further advice on identifying susceptibility.

1.6.6 Landscape value consists of:

- *‘The value of the Landscape Character Types or Areas that may be affected, based on review of any designations at both national and local levels, and, where there are no designations, judgements based on criteria that can be used to establish landscape value.*
- *The value of individual contributors to landscape character, especially the key characteristics, which may include individual elements of the landscape, particular landscape features, notable aesthetic, perceptual or experiential qualities and combinations of these contributors.’* (GLVIA, page 89, paragraph 5.44)

1.6.7 Paragraph 180 a) of the National Planning Policy Framework<sup>2</sup> gives weight to ‘*protecting and enhancing valued landscapes*’, however no definition of ‘valued landscape’ is given. The Landscape Institute’s Technical Guidance Note (TGN) 02/21 defines a ‘valued landscape’ as “*an area identified as having sufficient landscape qualities to elevate it above other more everyday landscapes*” (paragraph A4.2.11), where it is noted that “*everyday landscapes may nevertheless have value to people*” (Footnote 44). The TGN states:

*“Where a landscape has a statutory status, it will not be necessary to undertake an assessment based on Box 5.1 of GLVIA3 or the factors identified in Table 1 of this TGN. It may also be unnecessary where a local designation is supported by a strong evidence base. However, where there is little published evidence to support existing local landscape designations, an assessment based upon these factors would be helpful to support planning decision making”* (paragraph A4.2.11).

1.6.8 The following is a summary of the definitions in Table 1 from the TGN which sets out the range of factors that can be considered when identifying landscape value:

- **Natural heritage:** Landscape with clear evidence of ecological, geological, geomorphological, or physiographic interest which contribute positively to the landscape;
- **Cultural heritage:** Landscape with clear evidence of archaeological, historical or cultural interest which contribute positively to the landscape;
- **Landscape condition:** Landscape which is in a good physical state both with regard to individual elements and overall landscape structure;

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<sup>2</sup> Ministry of Housing, Communities and Local Government (December 2023), ‘*National Planning Policy Framework*’



- **Associations:** Landscape which is connected with notable people, events and the arts;
- **Distinctiveness:** Landscape that has a strong sense of identity;
- **Recreational:** Landscape offering recreational opportunities where experience of landscape is important;
- **Perceptual (Scenic):** Landscape that appeals to the senses, primarily the visual sense;
- **Perceptual (Wildness and tranquillity):** Landscape with a strong perceptual value notably wildness, tranquillity and/or dark skies; and
- **Functional:** Landscape which performs a clearly identifiable and valuable function, particularly in the healthy functioning of the landscape.

### **Landscape Character**

1.6.9 Landscape character areas (areas/types) were identified on plans and published descriptions and trends summarised. Where published documents create a hierarchy of landscape areas, this is stated and the scale most appropriate to the assessment is explained. The landscape characteristics within the site are compared to the character of the wider area.

1.6.10 The assessment focuses on the landscape within which the site/proposed development is located. The character of a neighbouring character unit may be strongly influenced by the adjacent area, within which the site is located. This relationship may be dependent on the scale of assessment (size of landscape units), as well as landscape characteristics that affect intervisibility, e.g., topography, vegetation cover.

### **Landscape Features**

1.6.11 Key landscape features that define site character are identified on plans, together with the tables, which provide information relating to their type, condition, value, and quantification (area/length/number). The potential for impact on each landscape feature is assessed using a combination of their relationship to the site/ proposed development (e.g., within, on or adjacent to site boundary and for those outside the site, the distance from the boundary) and sensitivity.

1.6.12 The landscape value of site landscape features is evaluated using factors in the following checklist:

- Type of landscape feature (e.g., natural or man-made);
- Size/extent (e.g., covers a large or small area; individual or part of a group);
- Condition or quality of landscape feature (intact);
- Maturity (is feature well established or recent);
- Contribution feature makes to landscape character (e.g., distinct and recognisable pattern or limited influence);
- Rarity (rare or widespread in local and/or regional/national context);

- Recognised importance (e.g., designation either nationally or locally);
- Ease with which the feature may be substituted or recreated.

1.6.13 The susceptibility of landscape features is closely allied to the ease with which a feature may be substituted or recreated.

1.6.14 The assessment of landscape features is an integral part of the initial design process and often influences the location of development. The landscape value of features is a contributory factor for the assessment of landscape character, as the assessment of the quality and condition of a landscape is intrinsically linked to its component features.

## **1.7 Criteria for Evaluation of Sensitivity of Landscape Resource**

1.7.1 The evaluation of overall landscape sensitivity to change is considered to be a product of susceptibility to change and the value of the receptor. The evaluation is an expression of comparative sensitivity based on a five-point scale: Very High, High, Medium, Low and Very Low as follows:

### **Very High:**

- An exemplary part of a nationally recognised landscape, e.g., National Parks and Areas of Outstanding Natural Beauty. World Heritage Sites of international importance (if landscape reason for designation);
- Strong landscape structure, characteristic patterns and balanced combination of landform and land-cover;
- Appropriate management with distinctive features worthy of conservation;
- Sense of place (usually tranquil);
- No (or occasional) detracting features;
- Landscape not substitutable.

### **High:**

- Part of a nationally or locally recognised landscape of particularly distinctive character.
- Recognisable landscape structure, characteristic patterns and combinations of landform and land-cover are still evident;
- Appropriate management, but potential scope for improvement;
- Some features worthy of conservation;
- Sense of place;
- No or occasional detracting features;
- Very limited substitutability and susceptible to relatively small changes.

**Medium:**

- Locally recognised, a landscape of moderately valued characteristics;
- Distinguishable landscape structure, with some characteristic patterns of landform and land-cover;
- Scope to improve management (e.g., of hedgerows);
- Occasional detracting features;
- Landscape resource reasonably tolerant to change.

**Low:**

- Ordinary undesignated countryside;
- Weak landscape structure, without characteristic patterns of landform or land-cover;
- Limited management which is beginning to show signs of degradation;
- Abundance of detracting features;
- A relatively unimportant landscape, the nature of which is potentially tolerant to substantial change.

**Very Low:**

- Degraded to damaged/polluted or derelict landscape structure;
- Single land use dominates;
- Lack of or poor management/maintenance/intervention which has resulted in degradation;
- Presence of disturbed or derelict land requiring treatment;
- Extensive or dominant detracting features.

**1.8 Visual Baseline Methodology**

1.8.1 The visual baseline serves to “*identify the people within an area who will be affected by changes in views and visual amenity – usually referred to as ‘Visual Receptors’*” (VR) (GLVIA, page 106, paragraph 6.13). The baseline should combine information on “*the nature, composition and characteristics of existing views*” (GLVIA, page 111, paragraph 6.24), “*the potential extent to which the site of the proposed development is visible from surrounding areas, the chosen viewpoints, the types of visual receptor affected*” (GLVIA, page 112, paragraph 6.25), and “*their susceptibility to change in views and the value attached to particular views*” (GLVIA, page 113, paragraph 6.31).

1.8.2 The susceptibility of visual receptors (VRs) to changes in views and visual amenity is affected by the type of activity that person or VR is engaged in (to determine the expectations of the viewer), in combination with the extent of the view of the site they experience, which relates to the degree to which the site is visible by a VR from a viewpoint as described in the baseline assessment (adapted from GLVIA, page 113, paragraph 6.32).

1.8.3 All viewpoints (from chosen representative, specific and illustrative viewpoint locations), were visited as part of the field survey and “*the nature, composition and characteristics*” of their existing views noted. Where appropriate, the existence of temporary structures or features in the landscape that vary with the seasons and that may therefore affect visibility, such as deciduous vegetation, were noted in order to evaluate the worst-case situation in the assessment. The initial appraisal is based on a grading of degrees of visibility, from not visible to fully open in close views. To indicate the degree of visibility of the site from any location, that continuum has been divided into four categories:

- **None:** No view (no part of the site or proposed development is discernible);
- **Glimpse:** Only a minor area of the site or proposed development is discernible and/or the view is transient or at such a distance that it is difficult to perceive in the wider view, or sequence of views;
- **Partial:** The site or proposed development forms a relatively small proportion of a wider view. There are open views of part of the site or proposed development such that it is easily visible as part of the wider view;
- **Open:** There are open views of the site or proposed development such that it forms a substantial part (is a dominant element) of the overall view and affects its overall character and visual amenity; or the site or proposed development is the dominant feature of the view, to which other elements become subordinate and where the site/proposed development significantly affects or changes the character of the view.

1.8.4 The value attached to views should also be considered i.e., whether the visual receptor/s being assessed are within a designated landscape, the site forms the setting to a heritage asset or there are particular tourism activities associated with the viewpoint location. The combined susceptibility to change in views/visual amenity and the value attached to particular views within the zone of visual influence of the site/proposed development, is evaluated using a combination of the information in the following checklist:

- *‘The type and relative number of people (visual receptors) likely to be affected, making clear the activities they are likely to be involved in;*
- *The location, nature and characteristics of the chosen representative, specific and illustrative viewpoints, with details of the visual receptors likely to be affected by each;*
- *The nature, composition and characteristics of the existing views experienced at these viewpoints, including the direction of view;*
- *The visual characteristics of the existing views, for example the nature and extent of the skyline, aspects of visual scale and proportion, especially with respect to any particular horizontal or vertical emphasis and any key foci;*
- *Elements, such as landform, buildings or vegetation, which may interrupt, filter or otherwise influence the views.’*

(GLVIA, page 111, paragraph 6.24)

## 1.9 Criteria for Evaluation of Visual Sensitivity

1.9.1 The evaluation of sensitivity, in relation to visual receptors is considered to be a product of susceptibility to change and the value attributed to the view by the visual receptor. It is

represented as an expression of comparative sensitivity, based on a five-point scale: Very High, High, Medium, Low and Very Low as follows:

**Very High:**

- An open view, where the site forms a dominant part of the view, seen from a viewpoint that has a high value (nationally significant), by visual receptors that would be highly susceptible to a change in the view (e.g., walkers/cyclists on rural public rights of way), whose attention or interest is likely to be focused on the landscape. For example, a walker on a national trail within an AONB, where the site forms the foreground to the view and is a characteristic part of a scenic and rural landscape.

**High:**

- A distant open or partial view of the site from a viewpoint that has a high value (nationally significant), seen by visual receptors that would be highly susceptible to a change in the view, whose attention or interest is likely to be focused on the landscape; for example, a walker on a national trail within an AONB, where the site forms a distant part of a wider view and is seen in the context of a foreground which is characteristic and forms part of a scenic and rural landscape;
- An open view of the site from a viewpoint that **either** has a medium scenic value (i.e., is locally appreciated), seen by visual receptors that would be highly susceptible to a change in the view **or** that the viewpoint has a high value (nationally significant) but the visual receptors experiencing the view have a medium susceptibility to change (e.g., a scenic road route, where the view is transient but is still a focus).

**Medium:**

- An open view of the site from a viewpoint that **either** has a low scenic value (i.e., has a number of visual detractors / a degraded landscape character), seen by visual receptors that would have a medium susceptibility to a change in the view **or** that the viewpoint has a medium scenic value (i.e., is locally appreciated) and the visual receptors experiencing the view have a low susceptibility to change (i.e. a major road or an office, where the view is not the focus of people's attention);
- A partial view of the site from a viewpoint with medium value, seen by visual receptors with a medium susceptibility to change;
- A glimpse of the site from a viewpoint that has a high scenic value (nationally significant), seen by a high number of visual receptors and / or visual receptors that would be highly susceptible to a change in the view and whose attention or interest is likely to be focused on the landscape.

**Low:**

- A partial view of the site from a viewpoint that has **either:**
  - a low scenic value, seen by visual receptors that would have a medium susceptibility to a change in the view;
  - a medium scenic value and the visual receptors experiencing the view have a low susceptibility to change; **or**
  - that the viewpoint has a low scenic value and the visual receptors experiencing the view have a low susceptibility to change;
- A glimpse of the site from a viewpoint with medium value, seen by visual receptors with a medium susceptibility to change;

- No view of the site, but that the viewpoint has a high scenic value and would be seen by a high number of visual receptors and/or visual receptors that would be highly susceptible to a change in the view, whose attention or interest is likely to be focused on the landscape.

**Very Low:**

- A glimpse of the site from a viewpoint that has **either:**
  - a low scenic value, seen by visual receptors that would have a medium susceptibility to a change in the view;
  - a medium scenic value and the visual receptors experiencing the view have a low susceptibility to change; **or**
  - that the viewpoint has a low scenic value and the visual receptors experiencing the view have a low susceptibility to change;
- No view from a viewpoint with medium value (or lower), seen by visual receptors with a medium susceptibility to change (or lower).

**1.12 Summary of Landscape/Visual Baseline**

1.12.1 The baseline survey identifies the landscape resource (landscape features and character) and visual receptors (VRs) likely to be affected by the proposed development, and then evaluates the susceptibility, value and combined sensitivity of each to the likely effects of the proposed development.

**2 Mitigation**

2.1 Mitigation is defined in the Guidelines as:

*‘Measures proposed to prevent/avoid, reduce and where possible remedy (or compensate for) any significant adverse landscape and visual effects...’* (GLVIA, page 57, paragraph 4.21).

2.2 Mitigation proposals are designed to respond to the constraints of the site and mitigate the landscape and visual impacts that arise from the proposed development. The mitigation measures considered fall into two categories: primary and secondary mitigation.

- Primary mitigation – the iterative process of master-planning;
- Secondary mitigation – additions or changes to the landscape proposals in order to address predicted residual effects remaining after primary mitigation measures are in place and assuming that standard construction and management practices, to avoid and reduce environmental effects, have been adhered to.

**3 Assessment of Landscape Effects**

3.1 The landscape impact assessment addresses both direct and indirect impacts of the proposed development. Firstly, the direct effects of the development on the site itself are categorised, through an assessment of the magnitude of change. The magnitude of change is a judgement on the size/scale of effect, including the consistency of the proposed development with the baseline assessment, the extent of the area influenced and the duration and reversibility of the proposed effects. The focus is on the loss or

change to identified landscape features within or adjacent to the site, together with the creation of new landscape elements.

3.2 Landscape character: The effects on local landscape character that would result from the proposed development are assessed. The effect on site landscape character directly correlates with the impact on landscape features (extent and duration). The effect on landscape character in the environs of the site is dependent on a range of factors (sensitivity) and overlaps with the visual assessment because the extent to which the proposed development would be visible from the surrounding countryside may influence neighbouring character areas. Effects on landscape character will also be directly influenced by the type of development proposed and whether it is consistent with existing land-use patterns.

3.3 Changes to landscape features and character may be adverse, beneficial or neutral. The erosion of a feature/character equates to an adverse impact, whilst strengthening of features/characteristics is regarded as beneficial. The substitution of a landscape feature/character area with another that is different but locally appropriate may be assessed as a negligible significance of effect. Refer also to GLVIA, page 88, paragraph 5.37.

3.4 For the purposes of this assessment, 'magnitude of change' on each landscape feature and landscape character area is classified using the categories listed below (Whilst potential effects may be adverse or beneficial, for simplicity, the following definitions use examples of adverse impact, bearing in mind that significant effects on landscape features, in the context of LVIA, usually equate with total or partial loss. Where effects are deemed to be beneficial this will be clearly stated in the assessment text):

**High:**

- Notable change in landscape characteristics over an extensive area;
- The proposals are the dominant feature and there is substantial damage (or major improvement) to key characteristics, features and elements that contribute to landscape, and/or the effects are long term and irreversible;
- Effect on a landscape feature of designated importance that cannot be replaced; total loss of features that would be difficult to replace;
- Loss of, or substantial effect on, existing landscape character and its replacement with characteristics that are atypical of the character area;
- The proposed development is inconsistent with existing land-use patterns.

**Medium:**

- Moderate changes in localised area;
- The proposals form a visible and immediately apparent new feature that results in partial damage to (or addition of) key characteristics, elements and features that

contribute to landscape, and/or the effects are medium to long term and largely irreversible;

- Total loss of feature that may be recreated over time; loss of small proportion of a feature that would be difficult to replace (e.g., mature woodland or historic species rich hedgerow);
- A considerable change to landscape character (proposed landscape character appropriate to character area but different from adjoining areas).

**Low:**

- Small change in any components;
- Some measurable change where the proposal constitutes a minor feature in the landscape and results in loss (or addition) of one (or maybe more) key characteristics, and/or the effects are short to medium term or could be irreversible;
- Total loss over sizeable area of a feature that can be recreated relatively easily (e.g., arable farmland); partial loss of feature that may be recreated over time, (e.g., young plantation/hedgerow); very minor loss of feature that would be difficult to recreate (e.g., woodland);
- A noticeable change to landscape character (proposed landscape character similar to existing landscape character of the area).

**Very Low:**

- Virtually imperceptible change of a temporary nature;
- The proposals result in very minor loss (or benefit) to the characteristics, features and elements that contribute to character, and/or effects are likely to be short term or could be reversible;
- Partial loss of feature that can be recreated relatively easily or which would regain its characteristics over time; minor or temporary effect on feature that can accommodate limited removal without noticeable change (e.g., gappy hedgerow);
- A barely perceptible change to landscape character.

3.5 The degree of significance of the landscape effect of the development is a product of sensitivity and magnitude of change.

**4 Assessment of Visual Effects**

4.1 The degree of significance of visual effects are assessed at two levels:

- i. The significance of the effect on each individual Visual Receptor;
- ii. The overall significance of the visual effects in the context of the zone of visual influence and the range of Visual Receptors as a whole.

4.2 Following on from the visual baseline, the degree of visibility of the proposed development from each Visual Receptor is assessed based on the same four categories: No view; Glimpse; Partial view, Open view. The view as it would be both during construction and operation of the proposed development is described. A direct comparison of the descriptions of the view following development (or during construction) with that of the existing situation, together with degree of visibility, indicates the extent of the change to



the view. The relationship between visual intrusion and extent of change to the view is dependent upon the character of the development in the context of the view and whether they are consistent or contrasting.

4.3 The scale or magnitude of visual change has been made with reference to the following:

- *‘The scale of the change in the view with respect to the loss or addition of features in the view and changes in its composition, including the proportion of the view occupied by the proposed development;*
- *The degree of contrast or integration of any new features or changes in the landscape with the existing or remaining landscape elements and characteristics in terms of form, scale and mass, line, height, colour and texture; and*
- *The nature of the view of the proposed development, in terms of the relative amount of time over which it will be experienced and whether views will be full, partial or glimpses.’*

(GLVIA, page 115, paragraph 6.39)

4.4 The geographical extent of a visual effect will vary with different viewpoints and is likely to reflect:

- *‘The angle of view in relation to the main activity of the receptor;*
- *The distance of the viewpoint from the proposed development; and*
- *The extent of the area over which changes would be visible.’*

(GLVIA, page 115, paragraph 6.40)

4.5 The magnitude of change can be classified as follows:

**High:**

- Total loss of, or major alteration to, key elements of the baseline view, and/or introduction of elements considered to be uncharacteristic of the baseline view. The development would occupy most of the view (open or panoramic view) resulting in significant change in the existing view.
- The proposals would cause a significant deterioration/improvement in the view. (If adverse, the proposals would be a dominant and incongruous feature in the view).

**Medium:**

- Partial loss of, or alteration to, (one or more) key elements of the baseline view, and/or introduction of elements that may be prominent but may not necessarily be considered to be substantially uncharacteristic to the baseline view.
- The development may affect a partial view of most of it, or viewers would have a clear view of only a small part of the development. Also refers to distant views in which the site forms a significant proportion of the wider view resulting in a noticeable change in the existing view;
- The proposals would cause a noticeable deterioration/improvement in the view. (If adverse, the proposals would form a visible and recognisable incongruous new element readily noticed by a casual observer. If beneficial, the proposals would form a recognisable improvement that could be noticed by a casual observer.)

**Low:**

- Minor loss of, or alteration to, one or more key elements of the baseline view, and/or introduction of elements that may not be uncharacteristic of the baseline view. Poor or difficult view of the development resulting in a perceptible change in the existing views; and
- The proposals would cause a minor deterioration/improvement in the view. If adverse, the proposals would be a small, incongruous element in the view that could be missed by a casual observer. If beneficial, the proposals would form a small improvement to the view that could be missed by a casual observer.

**Very Low:**

- Very minor loss of, or alteration to, one or more key elements of the baseline view, and/or introduction of elements that are not characteristic of the baseline view.
- Poor or difficult view of the development resulting in barely perceptible change of a temporary nature. Approximating to the 'no change' situation, where the proposals overall would not form a noticeable deterioration or improvement in the view.

**5 Landscape and Visual Significance**

5.1 The methodology is first to identify the sensitivity of the landscape features, local landscape character or the viewer and then the scale of change. From these the significance of the effects arising from the proposed development are assessed. At its simplest; sensitivity x scale of change = significance of effects but modified by professional judgement. The significance matrix provided below makes the judgements made by the professional assessors transparent so they can be understood easily by any reader of the assessment. The distribution of judgements is not intended to create a symmetrical matrix but reflects a pragmatic approach to determining levels of significance based upon its refinement over many years.

**5.2 Significance matrix for landscape and visual effects**

		<i>Sensitivity of receptor</i>				
		<b>Very High</b>	<b>High</b>	<b>Medium</b>	<b>Low</b>	<b>Very Low</b>
<b>Magnitude of change</b>	<b>High</b>	Major	Substantial	Substantial or Moderate	Moderate	Minor
	<b>Medium</b>	Substantial	Substantial or Moderate	Moderate	Minor	Negligible
	<b>Low</b>	Moderate	Minor	Minor	Negligible	Negligible
	<b>Very Low</b>	Minor	Negligible	Negligible	Negligible	Negligible

**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; a noticeable change to the view/landscape character in an average, ordinary landscape with some capacity to accommodate development or a small change in 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 significance).

**Minor significance of effect:** An effect of very local significance and unlikely to be of importance to the decision-making process; 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.

- 5.3 Effects are judged to be 'Significant' if they are assessed as being Substantial effects or higher. The professional judgement of experienced landscape assessors is used 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.

**LAND NORTH WEST OF GORING STATION, GORING-BY-SEA, WORTHING  
(REDETERMINATION)**

**Landscape Proof of Evidence - APPENDIX C**

**of**

**Christine Marsh – BA(Hons), Dip LA, CMLI**

**of**

**Hankinson Duckett Associates**

**for**

**Worthing Borough Council**

**APPENDIX C  
EXTRACTS OF POLICIES FROM THE WORTHING LOCAL PLAN 2023**

## **APPENDIX C**

### **EXTRACTS OF POLICIES FROM THE WORTHING LOCAL PLAN 2023**

#### **Policy SS1 - Spatial Strategy** (page 44)

Up to 2036 delivery of new development in Worthing will be managed as follows:

The Local Plan will:

- a) seek to deliver high quality development and provide for the needs of local communities and balance the impact of growth through the protection and enhancement of local services and (where appropriate) the safeguarding of employment sites, leisure uses, community facilities, valued green/open spaces and natural resources;
- b) help to deliver wider regeneration objectives, particularly in the town centre and seafront, through the allocation of key urban sites;
- c) seek to increase the rate of housing delivery from small sites.
- d) The strategy for different parts of the Borough is as follows:
  - i) Land within the Built Up Area Boundary - development will be permitted subject to compliance with other policies in the Local Plan. Development should make efficient use of previously developed land but the density of development should be appropriate for its proposed use and also relate well to the surrounding uses and the character of the area. Within the existing urban fabric nine key regeneration sites are allocated for development.
  - ii) Edge Of Town Sites - five edge of town sites are allocated for development.
  - iii) Open Spaces/Countryside/Gaps - valued open space and landscapes outside of the Built Up Area Boundary are protected. This includes important gaps between settlements, the undeveloped coastline and the features which provide connectivity between these areas.

#### **Policy SS4 - Countryside and Undeveloped Coast** (page 57)

- a) Outside of the Built Up Area Boundary land (excluding sites designated as Local Green Space 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. Applications for the development of entry-level exception sites, suitable for first time buyers or those looking to rent their first home will be supported where these:
  - comprise of entry-level homes that offer one or more types of affordable housing;
  - are adjacent to existing settlements, and proportionate in size to them; and
  - comply with any local design policies and standards.
- c) Development to support recreation uses on the coast will normally be permitted subject to:
  - i. built facilities being located within the adjacent Built Up Area Boundary;
  - ii. the need to maintain and improve sea defences.
- d) Any development in the countryside and undeveloped coast should not result in a level of activity that has an adverse impact on the character or biodiversity of the area.
- e) Improvements to green infrastructure, including (but not restricted to) enhanced pedestrian, cycle, equestrian access, and better access for those with mobility difficulties will be supported.

- f) The setting of the South Downs National Park and the Designated International Dark Skies Reserve must be respected and opportunities to improve access to the National Park will be sought through joint working with other organisations including the Park Authority, West Sussex County Council, National Highways and landowners. Any development within the setting of the National Park should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

**Policy SS5 - Local Green Gaps** (page 59)

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 A14) 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.

**LAND NORTH WEST OF GORING STATION, GORING-BY-SEA, WORTHING  
(REDETERMINATION)**

**Landscape Proof of Evidence - APPENDIX D**

**of**

**Christine Marsh – BA(Hons), Dip LA, CMLI**

**of**

**Hankinson Duckett Associates**

**for**

**Worthing Borough Council**

**APPENDIX D  
HISTORIC MAPS OF WORTHING (FROM 1879 AND 1970)**

APPENDIX D  
HISTORIC MAPS OF WORTHING (FROM 1879 AND 1970)





HISTORIC MAP FROM 1970s

