

Goring Gap – Planning Application AWDM/0737/26

Planning Statement – The Worthing Local Plan – SS4

Dear Gary,

Further to our meeting, I have continued to review the Worthing Local Plan, particularly Policy SS4 relating to the Local Green Gaps. I appreciate that this policy is likely to form an important part of your assessment of our application, and I would be grateful if you could consider the following observations.

I fully appreciate that every planning application must be determined on its own merits, having regard to the Development Plan and all other material considerations. Equally, however, planning policies should be applied consistently unless there is a clear and evidence-based planning reason to distinguish one case from another.

Having read the Local Plan (pages 58-59 are attached at the end of this statement) alongside the Council's own information regarding Brooklands Park, I was struck by the similarities in the wider planning objectives.

Link here: <https://www.adur-worthing.gov.uk/parks/find/worthing/brooklands-park/>

Brooklands Park is identified as one of Worthing's designated Local Green Gaps. The Council has invested significantly in transforming it into a major recreational destination, introducing a sustainable café, seating areas, event space, accessible pathways, fitness trails, shelters, community gardens, play facilities and extensive biodiversity improvements.

To me, this demonstrates that the Council does not interpret Policy SS4 as preventing all visitor-serving facilities within a Local Green Gap. Rather, it appears to recognise that carefully designed recreational infrastructure can coexist with the strategic purpose of the designation, provided the openness of the Gap and the separation between settlements are preserved.

That is precisely the principle we have sought to follow at Goring Gap.

Our proposal is intentionally modest, largely seasonal and, in many respects, reversible. It is intended to support recreation, health and wellbeing, tourism, biodiversity and the local economy, whilst preserving the openness of the site and without introducing substantial permanent built development that would undermine the strategic function of the Goring–Ferring Gap.

I am not suggesting that Brooklands Park and Goring Gap are identical. They clearly have different characteristics and contexts. My point is a narrower one: the Council's own investment and management of Brooklands demonstrates that Policy SS4 is capable of accommodating visitor-serving facilities where they do not compromise the purpose of the designation.

If the Council ultimately concludes that the proposal at Goring Gap should be treated differently, I would respectfully ask that the decision clearly identifies the material planning differences which justify that conclusion. It would be helpful to understand why visitor facilities considered appropriate within one designated Local Green Gap would be fundamentally unacceptable within another, particularly where both seek to encourage outdoor recreation, community wellbeing and environmental enhancement.

Having now read the Worthing Local Plan in considerable detail, I am increasingly of the view that the proposal aligns with many of its wider objectives. In particular, it supports policies relating to the visitor economy, sustainable communities, public health, biodiversity enhancement and encouraging people to enjoy the Borough's exceptional coastal environment.

My hope is that the application will therefore be assessed against the Local Plan as a whole, rather than by reference to a single policy in isolation. The Local Plan contains many objectives that support well-managed recreational uses, and I believe our proposal is capable of satisfying those objectives while still respecting the strategic purpose of Policy SS4.

As always, I remain willing to discuss any aspect of the application, provide further information if it would assist your assessment, or accept reasonable planning conditions where appropriate. My objective has always been to work constructively with the Council and the community to achieve a solution that enhances Goring Gap for the benefit of residents and visitors alike.

Thank you once again for the time you have already devoted to this application and for the constructive discussions we have had.

Kind regards,

Chris Dixon

The Undeveloped Coast

- 3.46 Worthing's coastline and beaches are valuable because the shingle beaches are sea defences that are important for shoreline management. The coastal waters and beaches contain important marine habitats including shallow reefs and areas of vegetated shingle. Furthermore, they are used for active pursuits, such as watersports, and for informal recreation. Any development on Worthing's coastline and beaches is likely to jeopardise their function and value. They will therefore remain outside the built-up area.
- 3.47 The coastal habitats are one of Worthing's key environmental assets and opportunities to protect and enhance the area will be sought as part of any development proposals in the seafront area. Marine planning has important links and interactions with land use planning as the intertidal zone between high water and low water mark is covered by both planning systems. The South Marine Plan (which includes Worthing) was adopted in July 2018. Decisions that might or will affect the marine area will now need to take appropriate consideration of the relevant marine planning documents, including the South Marine Plan under the terms set out in the Marine and Coastal Access Act 2009 (section 58).
- 3.48 The use of the beaches for sport and recreation is generally supported, however permanent built facilities required to support recreational uses should usually be located within the adjacent Built Up Area and be of a design appropriate to the character of the area. In considering any proposal for new recreation or ancillary facilities, flood risk and the need to maintain and improve sea defences will be taken into account.
- 3.49 The coastline south of the Built Up Area Boundary, excluding that defined as countryside, will be defined as undeveloped coast for the purposes of this policy.

SS4 COUNTRYSIDE AND UNDEVELOPED COAST

- 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.

Local Green Gaps

- 3.50 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.
- 3.51 Four areas are designated as 'Local Green Gaps' - two between Worthing and Ferring to the west:
- Goring-Ferring Gap;
 - Chatsmore Farm;
- and two between Worthing and Lancing/Sompting to the east:
- Brooklands Recreation Area and adjoining allotments;
 - Land east of Upper Brighton Road (see Allocation A14).
- 3.52 These areas 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. The designation of these areas as 'gaps' has been informed by the Council's evidence base (particularly the Landscape & Ecology Study) and supported by a high proportion of respondents at each consultation stage.

