

# THE WORTHING SOCIETY

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4 January 2022

Email: <a href="mailto:lan.moody@adur-worthing.gov.uk">lan.moody@adur-worthing.gov.uk</a>

Dear Ian

## APPLICATION TO EXTEND THE GORING HALL CONSERVATION AREA

I am writing on behalf of the Worthing Society to request that consideration be given to extending the Goring Hall Conservation Area (CA) to include the Goring-Ferring Gap. This open green gap aligns physically and visually with the boundaries of the existing CA. The designation and inclusion of the Gap within the CA would further enhance and complete the layout of this historic area.

## **LOCATION**

The Goring-Ferring gap is situated to the south of Ilex Avenue and immediately west of the Grade II Listed Goring Hall, now a private hospital. At the southernmost section, the land borders the undeveloped greensward and coastline. In fact, it is one of only two coastal gaps along the coast from Pagham Beach (SZ8896) and Roedean, Brighton (SU3403), a distance of 50km. The Goring-Ferring Gap is an excellent example of Worthing's unique topography featuring the South Downs National Park to the North and linking directly to the coastal views to the south. This open space forms a natural historic gap to prevent the coalescence of the Ferring and Goring settlements.

#### **HISTORY**

The Goring-Ferring Gap was originally part of the Goring Hall Estate, so there is a direct historical link to the existing conservation area. In 1834 David Lyon acquired the Goring Hall estate and planted the mile long avenue of Ilex Oaks, known as 'The Avenue' and which is unique in this country. The estate was later sold off in the 1930's. Hesketh Estates owned almost the entire acreage and intended to build extensively but with the advent of war in 1939 building stopped at the Plantation on the eastern boundary of the original estate and never resumed.

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Planning permission was refused for further building on the Gap and the company received compensation. At this time there was an increasing recognition that in order to retain the integrity of existing settlements it was necessary to prevent coalescence between existing communities. This led to the creation of the idea of Strategic Gaps as the Town and Country Planning Acts came into force. Since the war there have been attempts to develop the Gap but these have always been rigorously opposed by residents, which remains the position today.

The Rev Fox-Wilson in his book 'The Story of Goring and Highdown', published in 1987, states:

"Without the half-mile of fields in the Goring Gap the West Sussex coastal strip would be built up without a single break from Brighton to Littlehampton".

## **GREENERY AND OPEN SPACES**

The Conservation Area Appraisal Document (CAAD) for the Goring Hall CA refers to the importance of the greenery and open spaces to the setting of prominent buildings in the Conservation Area, notably Goring Hall and, to some extent, the Bull's Head, formerly the Bull Inn. The dominance of planting and particularly the mature trees is referred to as an important feature of the area. The Quercus Ilex trees form a strong link along Ilex Avenue through to Sea Lane, Goring and are parallel to the gap. They are an important feature as Ilex Avenue is said to be the longest avenue of Quercus Ilex in the world. The Goring–Ferring Gap sits immediately to the south of this avenue and perfectly complements the setting of these significant trees. The Avenue was donated to the Borough of Worthing in 1935 to be held in Trust. Any development on the proximate Goring-Ferring gap would be likely to harm the setting of these heritage assets and the area as a whole.

The eastern boundary is again bordered north to south by mature trees and includes the wooded area leading to the open Greensward and the sea beyond. This belt of woodland known as The Plantation is arguably one of the finest features of the gap and the original estate. Much of the central area is farmed as arable land and remains largely open and unfenced. Some sections show evidence of re-wilding.

The recent Covid 19 emergency and the effects of climate change have also emphasised the need to protect our open green spaces, highlighting their value in contributing to both mental and physical well-being.



**Ilex Avenue** 

#### **ASSOCIATED HERITAGE ASSETS**

As stated, this open land was historically part of the substantial Goring Hall Estate and still remains important to the visual setting of the Grade II Listed mansion house. The Planning (Listed Buildings and Conservation Areas) Act 1990 is relevant here as it refers to protecting the 'setting' of a listed building. Significantly, the CAAD for the Goring Hall CA makes the following comment regarding the mansion house which further supports the importance of maintaining the open space of the Goring-Ferring Gap:

"Goring Hall has a commanding aspect and can be seen from the seafront across OPEN FIELDS with the Ilex Avenue beyond".



Grade II Listed Goring Hall

We consider this observation underscores the importance of maintaining the open space of the Goring-Ferring Gap.

#### THE SOUTH DOWNS NATIONAL PARK

Another important reason for designating this land is that the Goring-Ferring Gap affords an unspoilt view looking north to the South Downs National Park (SDNP) and the adjoining historic Highdown Conservation Area. We consider any development on the gap would be intrusive and harmful to the views and setting of the SDNP. The Goring-Ferring gap can be viewed looking south from Highdown Hill, contributing to the historic character of the area.



Looking north from the Goring-Ferring gap to Highdown Hill & South Downs National Park

This would not be consistent with the Planning (Listed Buildings and Conservation Areas) Act 1990. The SDNP is a nationally important heritage asset which contributes positively to the character of Worthing. Another important consideration is that the SDNP became an International Dark Sky Reserve (IDSR) in May 2016. This designation would be compromised if the Goring-Ferring gap were to be built on, or used for other activities requiring floodlighting.

## WILDLIFE DESIGNATION

Since the original appraisal of the Goring Hall Conservation Area, the Goring-Ferring gap was designated as a Local Wildlife Site (LWS) on 30 June 2020. Information from the Sussex Ornithological Society confirms that the land consists of arable fields which include eight other habitats within the area which are important for many different species of birds. The Goring-Ferring gap is therefore important to protecting breeding and migrant birds. These fields support a wide range of bird species depending on the crops planted. Hedge rows and trees provide protective cover of migrant and breeding passerines. Equally important is the Greensward, an area of mowed grass that runs between the beach and Marine Drive along the southern boundary of the LWS and the gap. Being undeveloped and open to the sea beyond, it attracts many seabirds and rarer species of gull which roost in the unspoilt coastal area.

To exclude any part of the Local Wildlife Site by potential development or formal sites for sporting activities would mean that fewer species of birds would use the residual area. Any kind of floodlighting could destroy its attractiveness to migrant birds making for landfall within a non-urban area.

The Goring Gap is an LWS because each part contributes to the integrity of the whole, supporting a rich variety of bird species, but which, as yet, has no conservation designation. The Sussex Ornithological Society state that any attempt to reduce the size of the Goring-Ferring gap would mean the residual LWS would no longer meet the LWS criteria.

This would reflect in a loss of the wider biodiversity of the area as well as the social and environmental benefits. In our view, the resulting harm would not be consistent with Section 15 (para 19 (b)) of the National Planning Policy Framework 2021.

For reference, I attach a map of the Local Wildlife Site and a map of the Goring Hall Conservation Area to show the close relationship of the two areas.

## **PLANNING POLICIES**

The Society considers that the extension to the Goring Hall CA to include the Goring-Ferring gap is supported by the guidance in the following planning policies:

- a) NPPF Section 15: Conserving and Enhancing the Natural Environment.
- b) NPPF Section 16: Conserving and Enhancing the Historic Environment.
- c) The Planning (Listed Buildings and Conservation Areas) Act 1990.
- d) Emerging Local Plan Policies, in particular, SS6 and DM18 (d) and (e).

## **SUMMARY:**

We consider the area of land known as the Goring-Ferring Gap forms a natural visual enhancement to the adjacent Goring Hall Conservation area and has associated group value. Since the original appraisal for the existing conservation area, the relevance of the Gap has increased with the designation of both the SDNP in 2014 and the LWS status in 2016. The

Goring-Ferring gap is, in our view, an area of notable environmental and historic importance, providing a strong sense of place. The setting of the land immediately adjacent to the unspoilt coastline is a unique and important environmental feature, surviving from the original estate.

For the reasons stated the Worthing Society submits that the Goring-Ferring gap should be designated as an extension to the existing conservation area. The prevention of development and the retention of this land as open green space is important to the overall historic setting of the area and, significantly, the continued protection of the Local Wildlife Site.

#### **ENDORSEMENT**

This submission has been seen and approved by our President, Mr Anthony Malone.

Yours sincerely

Susan

Mrs Susan Belton Worthing Society Chair

Cc: Mr James Appleton, Head of Planning Regeneration and Well-being

Mr Richard Small, Design and Conservation Architect.

Acknowledgement: The Sussex Ornithological Society

Appendix 1 Map of Goring Gap

Appendix 2 Map of the Goring Hall Conservation Area.

## **APPENDIX 1 – GORING GAP**



## **APPENDIX 2 - GORING HALL CONSERVATION AREA**

