

Consultation Summary

Goring Hall

As part of the review of Conservation Areas in Worthing, the Council consulted on the following document:

<https://www.adur-worthing.gov.uk/media/Media.170529.smx.pdf>

This report summarises the representations received and the Officers' responses.

Goring Hall Conservation Area

The Council received **15** representations. These included:

- **1** written representation from Historic England (statutory consultee)
- **1** written representation from Goring and Ilex Conservation Group
- **13** representations from local residents

The issues raised in these representations are presented below, along with Officers' responses to these comments.

Historic England

Issue	Response
Historic England's has recently published a research paper on 'A Delicious Retreat: The Marine Villa and its Setting in England, C. 1760 to C. 1840. A Contextual Study. You may find useful information in this in respect to further understanding the significance of this conservation area and the important features associated with it.	The Council welcomes the response from Historic England. Noted.
We note that it is not proposed to include the Goring- Ferring Gap within the conservation boundary and we support the justification for this as conservation area designation is rarely appropriate for protecting a wider landscape.	Support is noted.
We agree though that it is important to identify the importance of this gap as forming part of the setting to the conservation area and contributing to its significance. Our only comment is that instead of identifying this as a landscape buffer, it may be better to identify this as land that positively	Noted, amendment to be made to Map.

contributes to the setting of the conservation area.

Special architectural and historic interest

Question 1:

Do you support the designation of Goring Hall Conservation Area?

- Yes - 13 representations
- No - 2 representations
- Not answered - 0 representations

Any additional comments?

Issue	Response
This is an important Conservation Area largely because of its green character which has been emphasised in the appraisal and which is of especial importance in the ecological emergency we are in and which includes the impressive and unique Ilex Avenue. Even though it seems a case can't be made for including the Goring-Ferring Gap in the area, it helps to have it appraised as an important buffer.	Comments noted. Historic England (statutory consultee) has confirmed that it supports the Council's approach to not include the Goring-Ferring Gap within the conservation area boundary.
The existing area should be expanded to cover the whole of the former Goring Hall grounds, to protect the pre and between the wars houses of interest and reduce the risk of over development on green spaces or demolition and erection of new builds that are not in keeping with the area.	Having due regard to Historic England Advice Note 1, it is not considered appropriate to extend the conservation area boundary to incorporate the interwar housing on land formerly associated with Goring Hall.

Special architectural and historic interest

Question 2:

In general has the draft Character Appraisal adequately identified the Conservation Area's special architectural or historical interest?

- Yes - 13 representations

- No - 2 representations
- Not answered - 0 representations

Any additional comments?

Issue	Response
<p>The Ilex is frequently being used by mopeds. Increasing numbers of cars driving down the Ilex and stopping. Steps should be taken to prevent vehicles from entering. The hospital should be prevented from any further expansion. The character of Goring Hall has been irreparably changed and not for the best.</p>	<p>Comments noted. This falls outside of the scope of the Conservation Area Review consultation. Any highway matters should be directed to West Sussex County Council as Highway Authority.</p>
<p>I understand from the presentation tonight why the South Goring gap was not included in the conservation area. However it is such a unique space on the stretch of shoreline from Brighton to Bognor, that I strongly oppose any future plans to build on it .</p>	<p>Comments noted. Historic England (statutory consultee) has confirmed that it supports the Council's approach to not include the Goring-Ferring Gap within the conservation area boundary. The Worthing Local Plan (2023) contains Policy SS5: Local Green Gaps which seeks to protect the identity and character of Goring-Ferring Gap. Any development proposals that come forward will have to comply with this Policy.</p>
<p>No mention of the royal connection with the late queen mother's Bowes-Lyon family. Mentions Mr Lloyd's connections to slave trade which is currently contentious for many.</p>	<p>Comments noted.</p> <p>A heritage consultant has carried out significant research into the historical development of Goring to help inform the revised Character Appraisal</p> <p>The main purpose of the Character Appraisal is to document the key historical context and the characteristics of the conservation area that make it special. Whilst every effort has been undertaken to provide a detailed historical description, it is not necessary to include all historical events / relations.</p>
<p>The appraisal acknowledges the historical association of David Lyon with the slave trade. It's important for us to remember this. Could it also clarify exactly who owns the land and Hall now?</p>	<p>Noted.</p> <p>Please refer to paragraph 3.17 of Goring Hall Conservation Area Character Appraisal. Goring Hall is a privately owned hospital.</p>
<p>I think there are more buildings of architectural interest not covered</p>	<p>The Conservation Area Character Appraisal is not intended to describe all buildings</p>

	within the conservation area but to recognise those which contribute positively, or otherwise to it.
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Question 3:

Do you think the Conservation Area has any other aspects of special interest which should be included in the appraisal?

- Yes - 8 representations
- No - 7 representations
- Not answered - 0 representations

Any additional comments?

Issue	Response
The land to the south and the sea.	Noted. Historic England (statutory consultee) supports the approach taken not to include the Goring- Ferring Gap within the conservation boundary and they support the Council's justification as conservation area designation is rarely appropriate for protecting a wider landscape.
The area should be extended to cover all the south gap.	Noted. Historic England (statutory consultee) supports the approach taken not to include the Goring- Ferring Gap within the conservation boundary and they support the Council's justification as conservation area designation is rarely appropriate for protecting a wider landscape.
It has been featured as an area of outstanding natural beauty in various publications. No mention of the birds and other natural inhabitants. A historic and unique setting with uninterrupted views from coast to downs.	Noted. It must be clarified that this land is not designated as an Area of Outstanding Natural Beauty and there are no landscape designations. The principal purpose of a conservation area is to protect the identified special architectural and historic interest of a place. Wildlife such as birds is not classed as a special interest when considering the function of a conservation area. Any development proposals that will come forward will need to be assessed against policies in the Worthing Local Plan (2023) such as Policy DM18 Biodiversity. This

	policy seeks to safeguard notable and priority habitats or species.
Goring Gap if there is any way to protect this.	Noted. Historic England (statutory consultee) supports the approach taken not to include the Goring- Ferring Gap within the conservation boundary and they support the Council's justification as conservation area designation is rarely appropriate for protecting a wider landscape. The Worthing Local Plan (2023) contains Policy SS5: Local Green Gaps which seeks to protect the identity and character of Goring-Ferring Gap. Any development proposals that come forward will have to comply with this Policy.
The unique nature of the Ilex Way and its significance to the area should be highlighted. There are very very few paths of this type in the UK and its availability to all residents and visitors to the area is worth preserving. Indeed the entire conservation area and the unique architectural elements should be protected.	Comments noted. The Character Appraisal documents the historical significance of The Ilex Avenue and how it contributes to the special historic interest of the conservation area.
I think there are more buildings of architectural interest not covered	The Conservation Area Character Appraisal is not intended to describe all buildings within the CA but to recognise those which contribute positively, or otherwise to it.
Wildlife	Noted. The principal purpose of a conservation area is to protect the identified special architectural and historic interest of a place. Wildlife is not classed as a special interest when considering the function of a conservation area. Any development proposals that will come forward will need to be assessed against policies in the Worthing Local Plan (2023) such as Policy DM18 Biodiversity. This policy seeks to safeguard notable and priority habitats or species.

Character and appearance

Question 4

In general, has the Appraisal adequately identified the good and the harmful features of the Conservation Areas?

- Yes - 12 representations
- No - 3 representations
- Not answered - 0 representations

Any additional comments?

Issues raised and officer response:

Issue	Response
<p>The hospital has completely ignored planning consent for equipment sited in the courtyard.</p>	<p>This is outside the scope of the Character Appraisal, but the detracting nature of some of the hospital development has been recognised.</p> <p>This comment has been forwarded to the Council's Development Management Team for their consideration.</p> <p>Alleged breaches of planning control can be reported online which will be investigated by the Council's Planning Enforcement Team:</p> <p>https://adur-worthing-eforms.onmats.com/w/webpage/planning-enforcement-complaint</p>
<p>I don't think that it has been fully addressed in the Appraisal. It reads rather light on both counts and gives the impression that it's a 'nice to have' with little emphasis on how important it is to both the local community and the many visitors that it attracts.</p>	<p>Comments noted.</p>
<p>The word harm, or harmful appears only three times within the document, and no reference appears to relate to harmful features of the conservation areas, so unsure of the significance of the question.</p>	<p>Comment noted. The character appraisal identifies features which make a positive or negative contribution to the character or appearance of the conservation area, and can present recommendations, for example, identifying opportunities to make beneficial changes or to apply further planning controls to help retain the special interest of the area.</p>

Question 5

Do you think the Conservation Areas have any additional good features which should be identified in the Appraisal?

- Yes - 6 representations
- No - 9 representations
- Not answered - 0 representations

Any additional comments?

Issues raised and officer response:

Issue	Response
We live in the Lodge house which has two original gate posts with lovely old Gargoyles on them. Many people walk past and admire them.	Noted.
The area should extend to include the whole of the southern goring gap.	Noted. Historic England (statutory consultee) supports the approach taken not to include the Goring- Ferring Gap within the conservation boundary and they support the Council's justification as conservation area designation is rarely appropriate for protecting a wider landscape. The Worthing Local Plan (2023) contains Policy SS5: Local Green Gaps which seeks to protect the identity and character of Goring-Ferring Gap. Any development proposals that come forward will have to comply with this Policy.
The conservation area of Goring Hall should include the Greensward. It should also mention a link to the historic Highdown Gardens from where the Goring conservation area can be viewed.	Refer to paragraph 5.10 of the Character Appraisal.
The Adur and Worthing councils have outlined the many good reasons why the conservation areas should be protected. Whilst I recognise that there are pressures, it is heartening that the council are so supportive of preserving all the areas and architecture. It is essential to the character of the area in which we live, and the unique nature of Worthing and the surrounding areas as seaside towns within the UK. We are part of the heritage of the country, and just as important as large estates and	Comments noted.

significant towns of Oxford, Cambridge and similar. Given the overall decline of such seaside communities, it is important that features and open spaces are preserved for all, not just residents but also for visitors.	
Importance of open spaces for mental well-being	Noted. Adur & Worthing Councils has a Health and Wellbeing Strategy (2021-2024) which includes a priority to create places, spaces, and environments that promote and enable good health and wellbeing. The strategy sets out the importance of maximising the use of our green and blue spaces to support wellbeing: encourage and nudge people towards increased physical activity in these spaces.

Conservation Area Management

Question 6

Do you agree with the management proposals set out in the draft Character Appraisal?

- Yes - 14 representations
- No - 1 representations
- Not answered - 0 representations

Any additional comments?

Issue	Response
They are a bit too light	Noted. No additional information has been supplied to substantiate this comment.
I think the recommendations to resist development on green spaces within and around the Conservation Area, improve the public realm, maintenance and management of Ilex Avenue and to look for opportunities to encourage enhancement of the hospital grounds are very welcome.	Comments noted.
I am aware from talking to residents that there is debate about the existing	Refer to paragraph 7.5 of the Character Appraisal. An amendment has been made

<p>management plan for Ilex Avenue and no doubt varied opinions about any future management plan. Can the appraisal make suggestions about the scope and governance of the management plan and engagement with residents, bearing in mind that it currently involves Parks and a volunteer community group (Goring & Ilex Way Conservation Group) and inevitably questions around budget, funding and capacity. If it can't make specific suggestions could it at least refer to these as issues that need to be addressed by the council? There is one very simple change that could be made - the bench at the start of Ilex Avenue (eastern end) faces the roundabout on Sea Lane rather than looking down the Avenue!</p>	<p>to address the objective for partnership between the Council and local residents/ interest groups.</p>
<p>Recommendations need to take into account the biodiversity aims of the borough, especially in a declared ecological emergency, and also the need for flood mitigation and adaptation wherever possible.</p>	<p>Noted. The principal purpose of a conservation area is to protect the identified special architectural and historic interest of a place. Any development proposals that will come forward will need to be assessed against policies in the Worthing Local Plan (2023) such as Policy SP2: Climate Change, Policy DM18: Biodiversity and Policy DM20: Flood Risk & Sustainable Drainage.</p>
<p>It seems that extensions and alterations to the hospital in the past have mainly had a negative effect on the character of the Conservation Area and have happened despite the designation as a CA. Nearby residents are constrained themselves by the rules of the CA but are negatively impacted by works that have been done to the hospital. It seems important to stress that engagement needs to be done with the current owners to reverse if possible negative impacts, avoid future ones and restore features that would enhance biodiversity or flood avoidance eg car parks with SUDS, restoration of orchard etc.</p>	<p>Comments noted.</p>

<p>Although fully in favour of the Conservation Area appraisal and the inclusion of the value of the "Gap" outside the conservation area, we do have two areas of concern. The first is the maintenance of the Ilex trees to improve the natural light and allow views to the sea. We hope that this will be undertaken sympathetically to (as noted in the Appraisal) respect the character and appearance of the Avenue and not denigrate the arched appearance typical of the Avenue. Our other concern is in respect of the surface finish of the Avenue. The appraisal notes that opportunities to improve and maintain the existing surface finishes. We certainly endorse the maintenance of the finishes but improvement should be carefully considered. When a possible entrance along the avenue to the Goring Hall hospital was proposed, following a committee member's concern, the Attorney General, in 1992, as protector of charity, informed Worthing Borough Council that any significant alteration to the surface of the Avenue would be unlawful (we have a copy of this letter). In addition, it must be remembered that the Avenue is also a bridleway (reference to the 1930 photograph) and the surface should be suitable for horses, free from stones, especially if angular or sharp edged, ideally resilient, with some give. Regular users of the Avenue will also be familiar with the surface conditions throughout the year and will come equipped as necessary. We fully concur with any proposals to reinstate the grass verges either side of the track. We would also like to be involved in any further discussions on the surfacing.</p>	<p>Refer to paragraph 7.5 of the Character Appraisal. An amendment has been made to address the objective for partnership between the Council and local residents/ interest groups.</p>
<p>Having grown up in Ilex Way and played in the Ilex trees as a child I am strongly of the opinion that the 'dirt' surface should be maintained in its natural state. The grass verges on the edge of the trees should be maintained especially where thick</p>	<p>Noted. Comments have been passed to the Council's Parks Team for their consideration.</p>

undergrowth has been allowed to develop. The trees should be maintained carefully to ensure their longevity and to ensure no more are lost in high winds. In particular the tree opposite 42/44 Ilex Way which is very tall and wide. The trees planted to replace those lost in the 1987 hurricane should be properly managed as I recall two or three were planted in every gap eg. outside no 42 where one fell in our front garden. There could be a problem when all these grow to full size.

Question 7

Are there any other actions that you consider are needed to preserve or enhance the conservation area?

- Yes - 12 representation
- No - 3 representations
- Not answered - 0 representations

Any additional comments?

Issues raised and officer response:

Issue	Response
Prevention of vehicles driving down the ilex.	This falls outside of the scope of the Conservation Area Review consultation. Any highway matters should be directed to West Sussex County Council as Highway Authority.
I mentioned this at the meeting. The relentless expansion of Goring Hall hospital has a big impact on the traffic and parking in the conservation area. I realise there is a balance between the health needs of the local population and the desire to preserve the area. But I think it's the wrong location for a very big hospital .	Comments noted.
I am pleased to see the recommendation that a new CACA is undertaken. I have been concerned about the lack of maintenance of the whole area, in particular	Noted. Comments have been passed to the Council's Parks Team for their consideration.

<p>the trees forming the historic, unique Ilex Avenue. The Avenue has many sections which are overgrown, young trees are being “suffocated” with bramble bushes and the general character is being compromised. Basic safety maintenance is undertaken, but there is a gross lack of preservation and conservation. I have reported this to the Goring & Ilex Conservation Group and WBC.</p> <p>I request that the report is amended to emphasise the importance of the Avenue and all the trees, the area is not “only the land immediately around the house”. Indeed, the law defines a conservation area that extends beyond buildings, to include trees and paths, as per the map.</p> <p>The report calls for a Management Plan of the Ilex Avenue. This is a very important comment as the lack of a current plan in the past has resulted in ad-hoc work contrary to the conservation directives, so it is reassuring the author recognises that such a plan is needed. I suggest that there is a further recommendation as to the extent and governance of this plan as the previous Conservation Area “appraisal” (date unknown) was merely a wish list, and not implemented.</p>	<p>Opportunities will be taken to address measures via relevant planning applications - the Council will not be able to address all matters themselves.</p> <p>Refer to paragraph 7.5 of the Character Appraisal. An amendment has been made to address the objective for partnership between the Council and local residents/ interest groups.</p>
<p>The Ilex trees need proper management to preserve the avenue and the surface is so disgraced that it is impossible to use after rainfall.</p>	<p>Noted. Comments have been passed to the Council's Parks Team for their consideration.</p>
<p>Listen and work with the local community, residents and local conservation group</p>	<p>Noted.</p>
<p>Protection of Goring/Ferring Gap where possible</p>	<p>Noted. Historic England (statutory consultee) supports the approach taken not to include the Goring- Ferring Gap within the conservation boundary and they support the Council's justification as conservation area designation is rarely appropriate for protecting a wider landscape.</p>
<p>The recommendation to resist development on the surrounding fields could be strengthened to actively encourage continued use for (regenerative) agriculture (or horticulture). This would be in keeping with historical use and could help the borough develop food security, meet</p>	<p>Noted. Historic England (statutory consultee) supports the approach taken not to include the Goring- Ferring Gap within the conservation boundary and they support the Council's justification as conservation area designation is rarely appropriate for protecting a wider landscape.</p>

<p>biodiversity aims, enhance natural ecosystem solutions to flood risk etc.</p>	<p>Noted. The principal purpose of a conservation area is to protect the identified special architectural and historic interest of a place. Any development proposals that will come forward will need to be assessed against policies in the Worthing Local Plan (2023) such as Policy SP2: Climate Change, Policy DM18: Biodiversity and Policy DM20: Flood Risk & Sustainable Drainage.</p>
<p>Proper maintenance of the protected trees within the Ilex way.</p>	<p>Noted. Comments have been passed to the Council's Parks Team for their consideration.</p>
<p>The management of the trees and other bushes in the Ilex Avenue needs to be improved as they become overgrown. The walkway between trees needs management and improvements to reduce the flooding that occurs when it rains. I would support reinstating the stone walkway that has become covered in mud, if this were done using the original or replica red brick materials. Not if done with modern paving</p>	<p>Noted. Comments have been passed to the Council's Parks Team for their consideration.</p> <p>Refer to paragraph 7.5 of the Character Appraisal which notes the need for improved surfacing, subject to meeting the needs of all users.</p>
<p>Improved maintenance</p>	<p>Noted. Comments have been passed to the Council's Parks Team for their consideration.</p> <p>Refer to paragraph 7.5 of the Character Appraisal which notes the need for improved surfacing, subject to meeting the needs of all users.</p>
<p>It is recognised that for tree maintenance occasional vehicular access may be needed but attention should be given to barriers to prevent vehicular access by others and signs improved endorsing this both at the hospital crossing point and other possible access areas.</p>	<p>Comments noted. This falls outside of the scope of the Conservation Area Review consultation. Any highway matters should be directed to West Sussex County Council as Highway Authority.</p>
<p>Proactive maintenance to ensure the Ilex Avenue is retained and enjoyed for generations to come.</p>	<p>Noted. Comments have been passed to the Council's Parks Team for their consideration.</p>

Further Comments

Issues raised and officer response:

Issue	Response
Thank you for taking the time to preserve this beautiful area and historic buildings.	Noted.
I think the appraisal was an excellent piece of work, as was the public meeting to explain it, thank you to all concerned!	Noted.
Overall, the character appraisal seems comprehensive. I would welcome the opportunity to be involved should the council need or require input from local residents	Noted.
<p>I am very pleased to see progress in recognising the need for conservation and preservation of the area. The overall recommendation for a management plan highlights weaknesses in the general care and the low priority this area has received over many years. I hope WBC fully endorse the recommendations.</p> <p>As a local resident, regular user of the Avenue, and having observed a growing number of issues over the last 20 years, I offer some comments, mainly in support of the Ilex Avenue.</p> <ol style="list-style-type: none"> 1. In the Summary of Significance, Goring Hall is stated as the “predominant” reason for the CA designation. I do not fully accept this as the Ilex Avenue was of more historical interest, being “famed” in the UK and at greater risk, and still is. Later in the report the Avenue is described as a key aspect of the area’s character. Both are important and complementary. 	<p>Noted.</p> <p>Noted.</p>

2. When referencing the planned development in 1934 by Heskith Estates it is worth noting that HE supported the Ilex Avenue as a valuable asset for their new “Sunshine Town”. In their sales brochure they describe the Avenue as a “feature of quite unequalled beauty”.
3. In the History section the formation of the Ilex Avenue Conservation Group is not mentioned. I believe this is important and was a significant event, initially to stop the partial destruction of the Avenue by WBC in 1983. The founders (e.g. Mr Byron Wynn-Davies) are noteworthy in this comprehensive record.
4. In the Heritage Assets section there is no mention of the Ilex Avenue. Neither is the Avenue listed in Appendix 1.
5. In the Spatial Analysis it states the: “lack of maintenance has resulted in a worn track with the trees making an enclosed dark space.” The lack of maintenance of the Avenue is mentioned again in the Assessment of Condition, highlighting the lack of pruning which has altered the character, but does not fully describe the magnitude of the problem and risk. Other significant maintenance issues are: Ilex saplings covered by bramble; excessive epicormic growth; low canopy, also altering the character; dead branches. In the Detracting Elements section there is no mention of the Avenue, but if a Yellow Stone wall in Goring Hall can be a distraction, so too can bright yellow access gates and bright red notice boards down the Avenue.

This is the crux of my comments; the lack of conservation and preservation of the Ilex Avenue. Whilst there is a strong recommendation in the Management Plan to address this lack of maintenance, I ask that the observations in the relevant sections be expanded and emphasised so that they become key requirements. A root cause of this situation is a lack of budget. Goring Hall is privately owned, but the Avenue is dependent on WBC funding, and without an agreed need, or a well defined and approved standard, there will

Noted.

See new paragraph (3.17) of the Character Appraisal which addresses this comment.

These are part of the Ilex Way local list entry.

Paragraph 6.4 of the Character Appraisal has been amended to reflect this comment.

Concerns regarding the maintenance are noted, and have been forwarded to the Council’s Parks Team for their consideration. The Character Appraisal cannot be a tool to allocate funding, but can signpost the requirement for improved maintenance.

never be a budget. This report is the foundation of the management plan, an authoritative assessment which cannot be ignored. The last published CAA (no date, no name) lists seven Ilex Avenue “enhancement opportunities”, and not one has been fully implemented. Without a robust case for change there is a risk, a big risk, nothing will happen.

NB: “The historic photograph from c.1930 shows the Avenue at this time with a well maintained central track, grass verges and gaps between the trees allowing natural light and views across the agricultural fields to the sea.”

6. Referring to the original context of this report, whilst the CA review did not recommend extending the area to include the Goring/Ferring Gap, I believe WBC should consider including the Plantation. It has a strong historical link, as noted in the report, and contributes to the character of the area. NB: “The Plantation, which was planted as part of the Goring Hall Estate is another distinctive part of the landscape character within the setting of the conservation area”. I believe the public, who use the Plantation for recreation, would support such a proposal. Designating the Plantation a CA would also strengthen the case against any development of the Gap, as originally intended by the Worthing Society.
7. Likewise, I believe there is an argument to extend the CA of the Ilex Avenue to Sea Lane, Ferring. Currently the conservation area stops at the arbitrary Council limit. This is illogical, Conservation Areas should not be determined by political boundaries, only responsibility for their maintenance. Again, extending this area would add more protection to the Ferring Gap.
8. The report mentions the “contiguous” Goring Conservation Area. This has many similarities (e.g. Ilex Trees along Sea Lane, Listed Buildings, Molson Gardens) and lacks a Management Plan. I believe this should be subject to a CAA as soon as possible.

The plantation is included within the landscape buffer (to be renamed to recognise the positive contribution it makes to the setting of the conservation area).

Worthing Borough Council can only act within its defined boundaries and therefore it is not possible for the conservation area to be extended to Ferring as this area falls within the responsibility of Arun District Council.

Noted.

