



**CONSULTATION UNDER PART 4, SCHEDULE 4, ARTICLES 18,19 & 20 OF
THE
TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT
PROCEDURE)
(ENGLAND) ORDER 2015**

**South Downs National Park Authority
Consultation Response**

Planning application consultation

Application No: AWDM/1953/16

Outline planning permission for the erection of 52 no. dwellings in the form of two, three and four-storey buildings (including the provision of 30% on-site affordable housing) comprising of 4no. 1-bedroom flats, 10no. 2-bedroom houses and 38no. 3-bedroom houses; internal roads and parking, informal open space and landscaping together with an enlarged vehicular access on the south-eastern side of the site onto Steyning Road (all matters reserved apart from the access and the proposed realignment of the new Adur Tidal Wall flood defence).

Location: Grazing Land South West Of Flyover Steyning Road Shoreham-By-Sea West Sussex

The response of the South Downs National Park Authority is given in the context of the following:

‘The Environment Act 1995 sets out the two statutory purposes for National Parks in England and Wales:

Conserve and enhance the natural beauty, wildlife and cultural heritage

Promote opportunities for the understanding and enjoyment of the special qualities of National Parks by the Public

which relevant authorities (*which includes local authorities*) must have regard to in exercising their functions.

National Parks Authorities have the duty to:

‘Seek to foster the economic and social well being of local communities within the National Parks’.

in pursuit of the twin purposes above.

Following is the formal consultation response of the South Downs National Park Authority (SDNPA) on the above application.

The northern edge of the site is located within close proximity of the boundary of the National Park along the A27, and next to the Shoreham flyover junction. In the wider context, to the south the river Adur, is a SSSI

The site, with the downland setting behind, can be seen from the listed toll bridge across the river Adur; this is one of many key public viewpoints that should be considered as part of the landscape and visual impact assessment of the scheme on the setting and special qualities of the South Downs National Park. With this in mind, the SDNPA are concerned that notwithstanding the existing road infrastructure of the A27 bypass, the proposed extended urbanisation at the density and layout proposed, close to the boundary of the National Park and close to the river Adur, would overall be detrimental to the open outlook and aspect from Mill Hill LNR / LWS and designated Open Access Land – with the aforementioned toll bridge and river valley setting in the back ground.

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Due to the intersection of the A283, this site does not link to the main urban context of Shoreham, in this river valley location and appears a somewhat detached from the main urban built form to the east. In this context, it is also considered that the layout of the proposed scheme lacks an essential significant landscape buffer around northern and western boundaries; the landscaped buffer should be of a significant depth and type that would protect and provide a natural and gradual transitional buffer to ensure that the built form would be well away from the river and the boundary of the National Park, in this semi-rural location; such a buffer would also reduce the visual impact of the scheme by a reduced density of built urban environment and improved layout.

Turning to the height of the proposed buildings, it is considered that 4 stories would be too high and would be visually dominant in this location; a maximum of three stories located on the east side of the site with smaller buildings to the north and west would, together with the above, reduce the impact of the development in this exposed river valley, and on the setting of the National Park; the combination of a significant landscape buffer and appropriately located building heights would also help to lessen the impact of the development on the users of the Downs Link cycle path and other footpaths along the riverside.

If the development is approved it would be appropriate to consider improvements to road safety and how the layout of the site can provide sustainable access by foot and cycle in to the National Park, including where possible linking up with existing access in to the Park; there is a footpath directly opposite the site which is currently hard to access.

In addition, internal and any external lighting required in connection with this proposal would also have the potential to have significant effects on the dark skies of the National Park. In May 2016 the South Downs National Park became the world's newest International Dark Sky Reserve (IDSR). Therefore all development should include a full appraisal of both any internal and external lighting to consider what impact such may have on the dark skies of the National Park and if is appropriate and if so if/how it can be mitigated to meet the lighting standards of the Institute of Lighting Professionals (ILP) for this zone.

Finally, it was noted that the Red line of the submitted location plan shows the incorporation of Downs Link and Adur wall; perhaps this can be checked and clarified.

In conclusion, for the reasons given the South Downs National Park Authority have serious concerns about this development and consider that as proposed the development would be detrimental to the setting and special qualities of the South Downs National Park.

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As the landscape, with its special qualities, is the main element of the nearby South Downs National Park and its setting, attention is drawn to the South Downs Integrated Landscape Character Assessment (Updated 2011) as a key document as part of the overall assessment of the impact of the development proposal, both individually and cumulatively, on the landscape character of the setting of the South Downs National Park; this document can be found at:

<http://www.southdowns.gov.uk/about-us/integrated-landscape-character-assessment>

Taking into account the above in the determination of this application, the SDNPA would also draw attention of Adur and Worthing Councils, as relevant authorities, to the Duty of Regard, as set out in the DEFRA guidance note at:

<http://archive.defra.gov.uk/rural/documents/protected/npaonb-duties-guide.pdf>

It may also be helpful to consider the development proposals in the context of National Park Circular 2010 for guidance on these issues

at:https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/221086/pb13387-vision-circular2010.pdf

The SDNPA trust that the above comments are helpful to Adur and Worthing Councils in the appraisal and determination of this planning application, in consideration of the setting and special qualities of the South Downs National Park.

Any questions relating to this consultation response should be sent to:

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Planning Link Officer

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