

Adur and Worthing Councils
Development Management
Economy Directorate
Portland House
44 Richmond Road
Worthing
West Sussex
BN11 1HS

Our Ref: SDNP/20/03589/ADJAUT
Contact Officer: David Easton (SDNPA)
Tel. No.: 01730 819346

21st October 2020

Dear Sir/Madam,

Neighbouring Authority Consultation

Proposal: Adjacent Authority Consultation - AWDM/1264/20 - 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 (Outline with all matters reserved)

Address: Land North West of Goring Railway Station , Goring Street , Worthing , West Sussex

Thank you for your correspondence received 18 August 2020, consulting us as a neighbouring authority on the above noted development proposals.

Although the application site is located outside of the National Park, the Council has a statutory duty to consider the Purposes of the National Park when making its determination. The statutory purposes and duty of the National Park are:

- **Purpose 1:** To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.
- **Purpose 2:** To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.
- **Duty:** To seek to foster the social and economic wellbeing of the local communities within the National Park in pursuit of our purposes.

The National Park's comments on the development are as follows:

Thank you for consulting the South Downs National Park Authority (as a neighbouring authority) on the above application and providing us with an extension in order to submit our comments for the mixed use development comprising up to 475 dwellings along with associated access, internal roads and footpaths, car parking, public open space, landscaping, local centre.

Although the application site is located outside of the National Park, the Council has a statutory duty to consider the Purposes of the National Park when making its determination. The statutory purposes and duty of the National Park are:

- Purpose 1: To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.
- Purpose 2: To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.
- Duty: To seek to foster the social and economic wellbeing of the local communities within the National Park in pursuit of our purposes.

The development is proposed to be sited to the south of the A259, approximately 80m from the boundary of the National Park at its closest point. However, the indicative masterplan shows the built form situated approximately 255m from the boundary of the South Downs National Park. The site is highly sensitive due to its proximity to the boundary of the National Park which is particularly important to defend from the impact of development. It is therefore considered that the development has the potential to detrimentally impact on the setting of the National Park. The SDNPA makes no comment on the principle of development, however would recommend that consideration be given to the design of the development.

The development should be designed to minimise its visual presence and impact, and where impacts are identified these should be mitigated or minimised through appropriate design interventions. The ultimate design of the proposals should be appropriate to its sensitive, edge of settlement location in terms of the developments height, scale and density.

Consideration should also be given to the impact of the development upon the Highdown Conservation Area. The Conservation Area Character Appraisal and Management Plan can be found here: https://www.southdowns.gov.uk/wp-content/uploads/2020/06/Highdown-CAAMP_26_May_2020-compressed.pdf. The site will be visible from the top of the access road, see paragraph 4.4 and Figure 6 of the appraisal and as such it is requested that it and the Conservation Area Appraisal are considered as part of your determination of this application.

It is strongly recommended that the case officer also make reference to the View Characterisation Study - that describes the character of key views from inside the National Park in the determination of this application. The study can be found at the following website address <https://www.southdowns.gov.uk/wp-content/uploads/2015/10/Viewshed-Study-Report.pdf>.

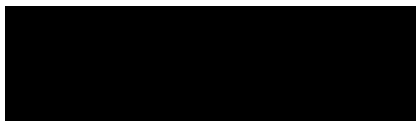
Consideration should also be given to the status of the National Park as a designated International Dark Sky Reserve. Dark skies and tranquillity are a special quality of the National Park which need to be protected. Paragraph 180(c) of the NPPF 2018 outlines that development should limit the impact of light pollution on intrinsically dark landscapes and nature conservation. The SDNPA would encourage a sensitive approach to lighting which conforms the Institute of Lighting Professionals for lighting in environmental zones, and tries to achieve zero upwards light spill in all respects. Any lighting should also take into account the biodiversity sensitivities of the site and not disturb or harm wildlife. The Council's biodiversity officer should be able to advise further on this. Further information/advice on sensitive lighting can be found in the SDNPA's Dark Skies Technical Advice Note 2018 which is available at the following link (document TLL 10):

<https://www.southdowns.gov.uk/planning/national-park-local-plan/local-plan-examination/core-document-library/>

Consideration should also be given to the creation of sustainable links between the development and the National Park to encourage public enjoyment and amenity of the National Park and public rights of way

where possible. The SDNPA would also encourage characteristic Green Infrastructure links to be created as part of the design and link to the people and nature network - <https://www.southdowns.gov.uk/national-park-authority/our-work/partnership-management/people-and-nature-network-pann/>

Yours faithfully



TIM SLANEY

Director of Planning

South Downs National Park Authority

Contact Officer

David Easton (SDNPA)

david.easton@southdowns.gov.uk