

19th January 2024

James Appleton, Head of Planning & Development
Adur and Worthing Councils

Dear James

**Land North West Of Goring Station, Goring-By-Sea, Worthing
(Redetermination)**

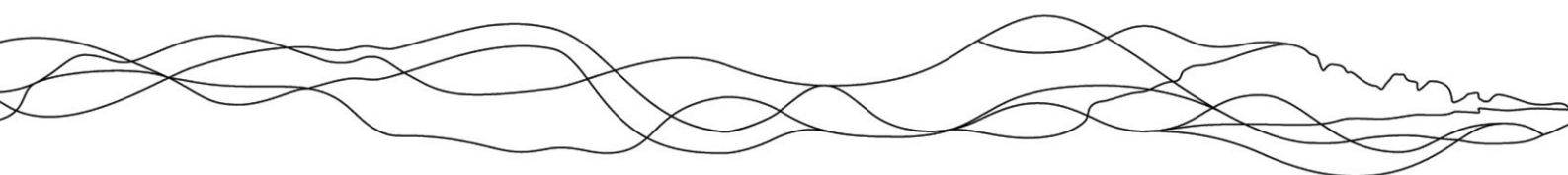
Thank you for sharing with us the draft landscape proof of evidence by Christine Marsh of Hankinson Duckett Associates for the above appeal. I confirm that the South Downs National Park Authority supports its conclusions about the landscape impact of the proposals on the setting of the South Downs National Park. In particular, it endorses the following overall conclusions:

“It is assessed that the proposed development would result in substantial adverse landscape and visual harm, and whilst this harm would be localised, the openness of the site means it would be easily perceived, not only from perimeter footpaths and roadways through adjacent urban development, but also from the elevated landscape to the north within the SDNP, and the site lies within its setting. The residual landscape effects would remain, as the loss of the gap would be permanent”.

Paragraph 182 of the National Planning Policy Framework (December 2023) confirms that “Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas”

In addition, I would draw attention to the change to the legislative duty on relevant bodies (including local planning authorities and the Planning Inspectorate) in relation to impacts on the National Park. At the time of the original application and appeal this was a duty to ‘have regard’ to the purposes of the National Park. This has now been strengthened by section 245 of the Levelling Up and Regeneration Act 2023 to a duty to ‘**seek to further**’ those purposes. This section of the Act took effect on the 26th December 2023 and therefore applies to this redetermination.

The new requirement in full is: “In exercising or performing any functions in relation to, or so as to affect, land in any National Park in England, a relevant authority other than a devolved Welsh authority must seek to further the purposes specified in section 5(1) and if it appears that there is a conflict between those purposes, must attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area comprised in the National Park”.



The purposes referred to are:

- 1: To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.
- 2: To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

In our view the proposed development would not further the purposes of the South Downs National Park in that it would not conserve and enhance its natural beauty or cultural heritage for the reasons set out in the landscape proof prepared by Christine Marsh of Hankinson Duckett Associates.

Yours sincerely,



Claire Tester MRTPI
Planning Policy Manager
Claire.Tester@southdowns.gov.uk
07387 107720

South Downs Centre, North Street,
Midhurst, West Sussex, GU29 9DH

T: 01730 814810

E: info@southdowns.gov.uk
www.southdowns.gov.uk

Chief Executive (Interim): Tim Slaney

