

Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

Our Ref: SDNP/20/03342/ADJAUT
Contact Officer: Rafa Grosso Macpherson
Tel. No.: [REDACTED]

8th September 2020

Dear Sir/Madam,

Neighbouring Authority Consultation

Proposal: Adjacent Authority Consultation - AL/61/20/PL - Continued use of land for agricultural workers accommodation for a temporary period of 2 years comprising 14 No chalets, low level lighting, retention of existing hardstanding, utilisation of existing individual foul treatment plants and existing permitted access, and associated works. This application falls in CIL Zone 3 (Zero Rated) as 'other development'.

Address: Nyton Rest , Nyton Farm Shop , Nyton Road , Aldingbourne , PO20 3TU

Thank you for your correspondence received 6 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:

This application relates to planning application AL/61/20/PL for the continued use of land for agricultural workers accommodation for a temporary period of 2 years comprising 14 No chalets, low level lighting, retention of existing hardstanding, utilisation of existing individual foul treatment plants and existing permitted access, and associated works.

andscape, Views, Ecosystem and Dark Night Skies

Of key consideration is the impact upon the setting of the National Park, a nationally designated landscape.

The Site is located within and surrounded by open countryside which has a close relationship to the



boundary of the National Park, approximately 1,100 metres away to the north east, and consequently the setting of the National Park. The site and the wider area contributes to the undeveloped, rural and open character of the area, within the setting of the National Park.

The SDNPA advises that any development within the setting of the National Park should positively contribute to ecosystem services and achieve environmental net gain.

The scheme, as proposed, includes large areas of hardstanding, which would detract from the natural, rural and undeveloped nature of the fields. Furthermore, the addition of outbuildings, caravans and mobile homes will contribute to the suburbanisation and deterioration of the rural landscape, which is largely undeveloped and comprises large grazing/agricultural fields with defined hedgerows/tree lines. The site may be visible from public rights of way in the vicinity (to the south west).

New hardstanding areas, outbuildings, structures and mobile homes could be prominent in this location and detract from the rural character of the area and setting of the National Park. Should the principle of development be acceptable, then the Local Planning Authority is advised to seek mitigation of landscape and visual impact harm through good design and appropriate landscaping.

Should the Local Planning Authority be minded to grant planning permission, the SDNPA would recommend to reduce the amount of hard standing within the site, all areas to be of permeable surfacing and incorporate sustainable drainage systems to manage surface water runoff.

Planting within the development should be native to the locality. This is crucial as native planting positively contributes to the enhancement of habitats and to the restoration of landscapes. Great importance should be given to plant species and how these can deliver multiple benefits in terms of ecosystem services, ecology, managing surface water, and creating any potential improvements to existing green infrastructure for example. It is recommended that no invasive non-native species are used. From the plans submitted with the application, the SDNPA would consider the proposed hedgerow along the boundaries is likely to be insufficiently wide as to screen the development and to be multifunctional (e.g. wildlife corridor). It would be recommended to incorporate substantial planting within the site to soften and break the visual impact of the development.

The National Park is an International Dark Night Skies Reserve - only the second such Reserve in England. For further information, please see <https://www.southdowns.gov.uk/enjoy/dark-night-skies/>. Dark Skies are also important in regard to the setting of the National Park and its special qualities. In order to conserve the dark night skies within the National Park, development within its setting should be sensitive and positively respond to this designation.

It is not clear whether external lighting is proposed on site, although it is assumed that at least some domestic lighting would be intended for the new mobile homes and outbuildings. Temporary external lighting may also be intended during the construction phase. If minded to approve the application, the SDNPA recommend that full details of any external lighting (both during and after the construction period) are secured by an appropriate planning condition with the intention of limiting light pollution, even where there may be an existing element of light spill from the surrounding residential development. External lighting should also be minimised in order to reduce the impact on local wildlife - including bat commuting areas, the dark skies and night landscape character.

Impact on protected habitats and species

An important consideration is the impact of the proposed development on surrounding protected habitats within, and adjacent to, the National Park. The potential impact of the development on protected habitats

and their species, both during the construction phase, and also post-construction, needs to be determined in order to ensure the wildlife and natural beauty of the National Park is conserved and enhanced. This is of particular importance to this site as it falls within the 12,000 metres buffer of the internationally protected Singleton and Cocking Tunnels SAC and therefore the site may support bats commuting.

Particular emphasis should be given to the provision of adequate green infrastructure that positively contributes to the local wildlife and create wildlife corridors that widely work within a network connecting the site and the National Park with their setting. Your ecological advisor should be consulted and should be able to advise you further on this.

Recommendation

The South Downs National Park Authority objects to the proposal in regard to the degree of harm to the setting of the National Park landscape. Areas of concern as well as potential improvements have been outlined above. However, should the Local Planning Authority be minded to recommend the application for approval, on balance, then improvements to the scheme are advised in order to mitigate impacts on the landscape and natural and scenic quality of this area and improve green infrastructure.

If there are any material changes to the proposals, or you would like further advice in relation to the National Park, please contact us.

Yours faithfully



TIM SLANEY

Director of Planning
South Downs National Park Authority

Contact Officer

Rafa Grosso Macpherson

