

Mrs A Gardner
Arun District Council
1 Maltravers Road
Littlehampton
BN17 5LF

Our Ref: SDNP/19/04461/ADJAUT
Contact Officer: Nat Belderson
Tel. No.: [REDACTED]

17th October 2019

Dear Sir/Madam,

Neighbouring Authority Consultation

Proposal: A/122/19/OUT - Outline application with some matters reserved for the erection of up to 160 dwellings with public open space, landscaping and sustainable drainage systems (SuDs), vehicular access point from Arundel Road together with up to 557 square metres of B1/B2 units with associated parking provision & vehicular access point from Arundel Road & land made available for expansion of current sports pitch provision to form a sports-hub (following the demolition of existing commercial units and one bungalow) (resubmission following A/36/18//OUT). This application is a Departure from the Development Plan. Address: Land Off Arundel Road, Angmering, BN16 4ET

Thank you for your correspondence received 12 September 2019, consulting us as a neighbouring authority on the above noted development proposals.

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

The National Park boundary lies, at its nearest point, approximately 200 metres to the north of the application site.

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

1. Conserve and enhance the natural beauty, wildlife and cultural heritage of the area.
2. Promote opportunities for the understanding and enjoyment of the special qualities of national parks by the public.

The District Council has a statutory duty to consider these Purposes as part of its determination of a future application for this site. If there is a conflict between the two Purposes, then the first Purpose should take precedence.

This application is an outline application with all matters reserved except access arrangements. However, our comments do include other matters which may be considered in more detail at a subsequent later date.

Policy

The site does not appear to be within a defined settlement policy boundary or allocation site (other than the protection of employment within the Neighbourhood Plan). Our understanding is therefore that the

South Downs National Park Authority, South Downs Centre, Midhurst, GU29 9DH

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proposals would be a departure from the existing adopted Local Plan and Neighbourhood Plan.

Access

The SDNPA seeks to promote sustainable travel to the National Park; reduce the impacts of traffic within it; and, promote healthy lifestyles. The A27 presents a significant barrier between the population to the south and the National Park, particularly for non-motorised users (NMUs) and this is reflected in Objective AN5 of the SDNPA Walking and Cycling Strategy 2017-2024 (2017), which seeks to "reduce severance and improve access and connectivity (for NMUs) to employment, green space and attractions for communities within and beyond the National Park, particularly the urban south Hampshire and the coastal fringe".

While there are some good NMU routes such as the Downs Link at Shoreham, other historic rights of way have been severed by the A27 and where crossings exist they are few and far between, often at grade and considered dangerous to use because of volumes and speed of traffic. Recent works to the north of the application site include works alongside the A27 and new NMU crossing points, including at Hammerpot Garage. Whilst crossing of the A27 is still far from ideal, the PRoW network north of A27 includes footpaths and bridleways which link directly to the South Downs Way National Trail and to other sites such as Cissbury Ring and the Angmering Park Estate.

The application documentation refers to proposals for new recreational footways connecting into the existing Rights of Way network, and the Transport Assessment/WHCR Assessment identifies the potential for a cycle route alongside Arundel Road. However, it is not clear whether off-site enhancements to the footpath to the west (FP 2176) would be proposed, or whether a cycle route alongside Arundel Road to the north would be provided. Either or both of these would be essential if NMU access to the National Park is to be encouraged (and to reduce the impact of traffic on the Arundel Road), alongside any further improvements that could be gained for safer crossing of the A27. In addition signage within the development site should also be provided to highlight where these links exist.

Although not part of the outline application we would like to draw your attention to initial views we have on other potential aspects of the proposal.

Lighting

The South Downs National Park is a designated International Dark Sky Reserve and 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.

Although located outside of the National Park, the proposed development has the potential to impact on the dark night environment of the National Park through contribution to upwards sky glow, and also through potential visual impacts of new light sources in the wider landscape. Dark Night Skies within and outside of the SDNP also have an importance in terms of tranquillity and perceptual quality of landscapes.

The District Council should have regard to this if considering a future details pursuant application and the development should include an appraisal of both internal and external lighting to consider what impact it may have on the dark skies of the National Park and how it can be mitigated to meet the lighting standards of the Institute of Lighting Professionals (ILP). This should include lighting both during the operational and construction phase of the development.

Although it does not appear to form part of the current application, it is likely that the Sports Hub will include floodlighting, (the Sport England response refers to the Palmer Recreation Ground being identified as a priority for a 3G floodlit pitch). Floodlighting has the potential to be especially harmful to dark night skies, although there will be some trade off against potential benefits of removing the current ageing floodlighting at this recreation ground. In addition, glare from sports pitches surfaces can also be significant.

The SDNPA would recommend that the following document forms part of the applicant's evidence base for the lighting assessment:

SDNPA Dark Skies Technical Advice Note (2018) (document TLL 10):

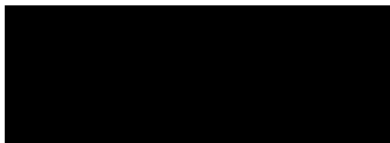
<https://www.southdowns.gov.uk/planning/national-park-local-plan/local-plan-examination/core-document-library/>

Public open space

As with the previous application, The masterplan includes a narrow stretch of open space around the perimeter of the site. It is not integrated into the layout of the scheme and does little to connect existing areas of habitat, particularly the surrounding woodland. As currently proposed it has the potential to merely form a circuit for dog walkers and is unlikely to be particularly inviting or an asset for more than the immediate residents. In many places it may be too narrow to provide any opportunities for ecological enhancement.

Due to the proximity of the SDNP, we would also encourage the developers to rethink the open space integrating it with the landscape and changes in contours as well as making linkages to the adjoining habitats, particularly the woodland. This is an opportunity to bring the National Park to the existing and new residents of Angmering.

Yours faithfully



TIM SLANEY

Director of Planning
South Downs National Park Authority

Contact Officer

Nat Belderson



