

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

Our Ref: SDNP/21/02488/ADJAUT
Contact Officer: Rafa Grosso Macpherson
Tel. No.: [REDACTED]

20th May 2021

Dear Sir/Madam,

Neighbouring Authority Consultation

Applicant Name: Arun District Council

Proposal: Adjacent Authority Consultation - A/31/21/PL - Variation of Conditions following grant of A/109/20/RES relating to Condition No 1 - Arboricultural Impact Assessment, Arboricultural Method Statement, Landscape Masterplan and Landscape & Public Open Space Plans and Condition No 7 - Arboricultural Method Statement and the Tree Removal / Protection Plans.

Address: Land South of Water Lane , Angmering

Thank you for your correspondence received 30 April 2021, 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 SDNPA on this application for approval of reserved matters following outline consent A/99/17/OUT for 175 dwellings. This planning application (ref. A/31/21/PL) relates to changes to the approved Arboricultural Impact Assessment, Arboricultural Method Statement, Landscape Masterplan and Landscape & Public Open Space Plans and Condition No 7.

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



The Authority raised concerns when the site was originally proposed to be allocated given its landscape sensitivity and the potential for development to negatively impact the setting of the National Park. The Authority objected to the outline planning permission A/99/17/OUT due to its failure to properly consider and respond to the site's landscape sensitivity, and the unacceptable negative impact of development upon the setting of the National Park and its Special Qualities. The detailed landscaping plans put forward at reserved matters application have not addressed the Authority's concerns. The Authority refers you to previous representations made and these continue to raise be relevant in regard to the proposed landscaping given the negligible changes in this current submission. Indeed, there are no significant changes to the landscaping and arboricultural plans and therefore our previous comments are still valid.

Under 11A (2) of the National Parks and Access to the Countryside Act (1949), any relevant authority, including Local Planning Authorities, must have regard to National Park purposes, in particular the first purpose which is to conserve and enhance the natural beauty, wildlife and cultural heritage of the area. It is notable that the application still appears to give no consideration to the impact of development on the setting of the National Park, which is a nationally designated landscape, or its special qualities. As previously iterated, the site is exposed in views from the National Park and as a characteristic rural buffer currently makes a positive contribution to its visual setting and the International Dark Sky reserve.

The Authority previously raised the poor quality of the proposed buffer along the boundary of the site, and its inability to provide an adequate screening function as a result. The revised Landscaping Master Plan appears to be similar to previously submitted versions and predominantly urban in character. The planting scheme still indicates that a single line of trees would be provided along the western 'woodland' buffer, several of which are still proposed to be non-native ornamental or evergreen varieties. This buffer is said to be in between 8 and 15 metres of width, but it is not supported with a Landscape and Visual Impact Assessment of visuals to understand whether the proposed buffer would screen and help to blend the development in the exiting landscape. It is highly unlikely that this inconsistent buffer planting is sufficient to mitigate the visual impact identified in previous consultation responses. The visual harm to the setting of the National Park would be clear from viewpoints (especially those at higher ground level) to the east and north).

A timber acoustic fence 3 metres in height is proposed in the latest revision on the north section of the eastern boundary. The use of artificial boundary treatments is considered to add further attention to the boundary of the site to the detriment of a rural landscape character which would normally be formed by hedgerows and trees. This acoustic barrier is therefore considered to detract from landscape character of the area and the setting of the National Park. Should the District Council support this barrier, it would be requested a condition to ensure that materials and finishes remain as rural as possible and that this is not painted or stained in a colour that would draw more attention to it.

The concerns previously raised with regards to visitor parking in very close proximity to the green buffer along the eastern boundary remains. The presence of visitor parking adds pressure for trimming, pruning and felling of trees as well as for harm to roots, due to compaction and water/ground pollution. These visitor parking spaces should be removed from the boundary to allow widening the buffer in the benefit of views and green infrastructure.

It is unclear from the information submitted which species are to be planted within the buffer, but these should be native species only.

Summary

In summary, the South Downs National Park Authority objects to the proposal due 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 a condition is advised in order to mitigate impacts on the landscape and natural and scenic quality of this area through improvements to green infrastructure. In particular, the eastern woodland buffer should be widened further, and the visitor parking spaces removed from it; and the planting plan revised to include predominantly native species.

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

