

FAO Mr M Eastham
Principal Planning Officer
Strategic Development
Arun District Council
Littlehampton
West Sussex

Our ref: SDNP/17/SDJAUT
Arun District Council ref: A/99/17/OUT

3 August 2017

Dear Sirs

Outline planning application for 175 dwellings at land south of Water Lane, Angmering

Thank you consulting the South Downs National Park Authority. The Authority wishes to **object** to the application proposals as outlined below.

National Park Purposes

The two statutory purposes of the SDNP designation are:

- To conserve and enhance the natural beauty, wildlife and cultural heritage of the area;
- To promote opportunities for public understanding and enjoyment of the special qualities of their area.

If there is a conflict between these two purposes, conservation takes precedence. There is also a duty to foster the economic and social well-being of the local community in pursuit of these purposes.

The site is within the setting of the National Park. Paragraph 109 of the NPPF outlines that the "Planning System should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, geological conservation interests and soils." The SDNPA considers that protecting and enhancing valued landscapes should also take into consideration the setting of valued landscapes also. In this instance, the South Downs National Park.

Section 62 of the Environment Act 1995 also outlines that in exercising or performing any functions in relation to, or so as to affect, land in a National Park any relevant authority (in this instance Arun District Council) shall have regard to the purposes of a National Park, as specified above. It is considered that this requirement can also relate to the setting of the National Park as well.

Considerations about the negative impact the proposals would have upon the setting of the National Park are outlined below.

This site is located in close proximity to the National Park boundary, as a result of the topography of the site and the Ecclesden Hills the site is exposed in views from the National Park as highlighted in the LVIA. These views will not only be of the development, but combine further negative effects upon experiential qualities such as the effect of lighting, noise etc. The slightly sunken and tree-lined nature of the A280 means you see over the road straight towards the village of Angmering which currently makes a positive contribution to the visual setting of the Park. In terms of landscape character the site contributes significantly to the setting of the National Park, through its provision as a characteristic rural buffer.

The landscape here currently provides numerous benefits for both people and wildlife. It serves as a key 'green wedge', drawing the landscape into Angmering and providing significant benefits for both people and wildlife as a result. This wedge benefits both visitors to the Park and people within the village, enabling wildlife movement and providing a characteristic part of Angmering's only green infrastructure through the village (the watercourse). This transition zone is important in terms of conserving and enhancing the special qualities of the National Park, currently this zone whilst just outside of the Park has many qualities in common with it and contributes to the National Park's setting. The site is separated from the settlement – there is no visual connectivity between the majority of the site and Angmering Village, as a result it feels highly disconnected within the transition zone between the National Park and the more rural areas.

Although the application is for outline planning permission, we would like to highlight the following specific issues in regard to the submitted masterplan, which are considered to exacerbate the landscape issues raised:

- The scheme does not appear to have been master planned using a landscape-led approach. This approach is crucial in sensitive landscapes such as this. It does not respect or respond to key landscape features on or close to the site, such as historic buildings, farmsteads, the watercourse and its function, key views, design, functional greenspace provision, historic boundaries.
- The site boundary itself appears to produce a disconnected scheme linked via a road, which, we suggest, serves to isolate green spaces as unusable pockets outside of the scheme.
- We would suggest the greenspaces within the site are insufficient in size and isolated to be able to produce any meaningful benefits for people or wildlife, other than the numerous play areas for children.
- The high density and 'inward-looking' layout and form of the development makes no attempt to respond to its landscape context or deal appropriately with the edge of the development to enable it to sit more comfortably within the landscape.
- Sustainable drainage (SuDS) does not appear to be integrated into the scheme and appears reliant upon two attenuation areas which the surface water will have to find its way to. Integrated vegetative SuDS is a much better way to achieve *in situ* drainage alongside internal green infrastructure requirements.

- A lack of green infrastructure through the scheme to help to integrate it into the landscape and create green corridors for wildlife inside and outside of the National Park.

Impact on tranquillity

This part of the Park partly by virtue of its geography is already under significant pressure from the coastal developments in this area, yet the Ecclesden Hills retain their relative tranquillity despite this – and whilst not as tranquil as areas deeper in to the Park this represents a significant local resource, given the poor tranquillity around much of the coastal zone.

Impact on dark night skies

The National Park is an internationally designated Dark Night Skies Reserve. Concern is raised about the impact of this development upon this designation. Impact could be primarily be caused by this proposal removing an unlit rural buffer between the settlement and the National Park, encroaching lighting nearer to the Park but also acting to intensify existing lighting within Angmering. Dark Night Skies is a key concern for the Park as an International Dark Skies Reserve, but it also is an experiential quality as part of landscape character and as such can negatively affect people's ability to enjoy and experience the national park as well as affecting residents' well-being.

Concluding points

The site is included in a recent (August 2016) Landscape Study where the majority of the site is identified as Site 15c. The site was judged as being of Substantial Landscape Sensitivity and Moderate Value. The SDNPA supports the findings of this assessment and considers the valuable evidence in this report has not been used to inform the proposed scheme.

Whilst a high sensitivity landscape does not always mean a site has no capacity, the location and shape of this site in itself generates a number of negative impacts. The proposed scheme raises various concerns as outlined above which would create an unacceptable negative impact upon the setting of the South Downs National Park and its Special Qualities.

Yours faithfully



TIM SLANEY

Director of Planning

South Downs National Park Authority

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

T: 01730 814810
E: info@southdowns.gov.uk
www.southdowns.gov.uk

Chief Executive: Trevor Beattie