

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

Our Ref: SDNP/20/03851/ADJAUT
Contact Officer: Nat Belderson
Tel. No.: [REDACTED]

28th September 2020

Dear Sir/Madam,

Neighbouring Authority Consultation

Proposal: Adjacent Authority Consultation - BE/99/20/EIS - Scoping opinion request relating to 2500 new homes, up to 3.52ha of employment land, a 3 Form Entry primary school, 2 local centres and associated infrastructure across approximately 141 ha of land.

Address: Land West of Bersted

Thank you for your correspondence received 7 September 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:

Landscape and Visual Effects

The site is some distance from the SDNP, but is located in the low lying coastal plain with potential for clear views from a number of high points within the SDNP according to the SDNPA View Characterisation and Analysis (20125) and accompanying cumulative Viewshed Map (which we recommend should be included as part of the applicant's evidence base). The submitted EIA Scoping Report includes Landscape and Visual Impacts and states that a report by Fabrik will be included within the ES. This should include a Landscape & Visual Impact Assessment which should explore, using evidence, how much the proposed development will impact the setting of the National Park, both in visual and landscape character terms. This will be a fundamental element of the Baseline Studies as it will help to determine the significance of any effects upon the National Park and its Purposes. It will require a synthesis of multiple strands of evidence to produce a holistic understanding of the site.

Lighting

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

[REDACTED]
ADADJZ

The submitted EIA Scoping Report scopes out light pollution but it should be noted that in 2016 the National Park was designated as an International Dark Night Skies Reserve. Development outside of the National Park (even when in close proximity to existing sources of sky glow) can adversely affect sky quality within the DNS Reserve. We would therefore advise that any lighting impacts should be assessed in terms of both the visual impact on the setting and tranquillity of the National Park resulting from the visibility of additional luminaries in the landscape, as well as the impact the proposed development may have on the quality of the dark night skies of the International Dark Night Skies Reserve.

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

Ecology and Nature Conservation

The applicant's EIA Scoping Report includes Ecology and states that a report will be prepared by FPCR. We note that Natural England have already been consulted on and responded to this Scoping consultation.

Yours faithfully



TIM SLANEY

Director of Planning

South Downs National Park Authority

Contact Officer

Nat Belderson

