

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

Our Ref: SDNP/20/04365/ADJAUT
Contact Officer: Kelly Porter
Tel. No.: [REDACTED]

23rd October 2020

Dear Sir/Madam,

Neighbouring Authority Consultation

Proposal: Adjacent Authority Consultation - BN/112/20/EIS - Environmental scoping opinion for up to 1500 dwellings, community facilities, local centre (shops and services), a primary school and associated playing fields and early years provision (nursery).

Address: Land at Barnham, Eastergate and Westergate

Thank you for your correspondence received 5 October 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:

We generally agree with the issues that have been 'scoped in' and 'scoped out' with the submitted EIA scoping report (Sept 2020). However, we would like to make the following specific comments.

/b Baseline Evidence

We would recommend that the following are included within the sources of information used to inform the baseline evidence and understanding of this site.

- South Downs National Park, Integrated Landscape Character Assessment (2011)
- South Downs National Park, Viewshed Characterisation and Analysis (2015)
- South Downs National Park, Tranquillity Study (2017)
- South Downs National Park, Dark Skies, Technical Advice Note (2018)

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

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Landscape and Visual Effects

Whilst the site is 2km (at its closest) to the boundary of the South Downs National Park (SDNP), it is located in the low lying coastal plain with potential for clear views from a number of high points within the SDNP according to our own View Characterisation and Analysis (2015) and accompanying cumulative Viewshed Map.

We agree with the proposed viewpoints to be considered, and in particular viewpoint 17 - Halnaker Windmill.

However, any work associated with the Landscape and Visual Impact chapter of the Environmental Statement should explore, using evidence, how the proposed development will impact the setting of the SDNP, 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 also require a combination of a number of strands of evidence to produce a holistic understanding of the landscape character of the site and any potential impacts on the SDNP.

Lighting

The submitted EIA Scoping Report appears to scope out light pollution but it should be noted that the SDNP is designated as an International Dark Night Skies Reserve (DNS 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 SDNP 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 DNS Reserve.

Yours faithfully



TIM SLANEY
Director of Planning
South Downs National Park Authority

Contact Officer
Kelly Porter



