

05 February 2019

Town Clerk,  
Arundel Town Council,  
Town Hall,  
Maltravers Street,  
Arundel  
BN18 9A

Dear Sir / Madam

**Subject: South Downs National Park Authority (SDNPA) response to the pre submission version of the Arundel Neighbourhood Plan Review (ANDP).**

This representation sets out the South Downs National Park Authority's (SDNPA) formal response to the pre submission version of the ANDP. These are officer level comments prepared by SDNPA Planning Policy officers.

Arundel forms an important gateway to the South Downs National Park (SDNP) as identified in the South Downs Local Plan which is currently at Examination. Part of the town of Arundel is within the SDNP but the main settlement is located outside the SDNP and therefore Arun District Council are the lead Planning Authority for this neighbourhood plan. Section 62 of the Environment Act requires all relevant authorities including Arundel Town Council to have regard to the purposes of the National Park. These are:

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

The SDNPA would like to commend the hard work and effort of the Neighbourhood Planning group and Arundel Town Council in the review of the ANDP. The SDNPA welcome the inclusion of policy AR6 and the ANDP recognition of the importance and value of a robust Green Infrastructure Network.

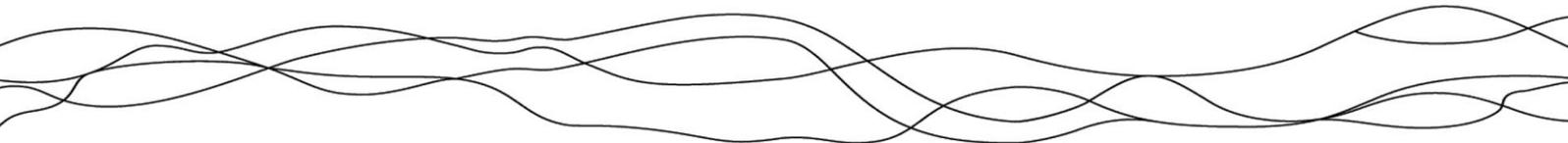
The SDNPA have made specific comments in relation to three policies of the ANDP. Our primary concern is regarding the allocation of land off Ford Road for approximately 90 dwellings. Whilst the Authority appreciate that this land sits outside the National Park, we consider it appropriate to set out our concerns in relation this land allocation and its impact on the setting of the National Park. We appreciate that this comment may require further consideration and discussion between the Authority and the Qualifying Body. We would be happy to attend any future meeting when the responses to the Pre Submission consultation are considered. Our officers can set out their concerns in more detail and discuss the mitigation measures which are referred to in paragraph 5.12 of the ANDP.

If you have any questions regarding our enclosed representation please do not hesitate to contact Communities Lead Chris Paterson who will be able to provide further clarification if necessary.

Yours Faithfully

A handwritten signature in black ink, appearing to read 'Chris Paterson', is centered within a light gray rectangular box.

Chris Paterson  
Communities Lead



## SDNPA response to the pre submission Arundel Neighbourhood Development Plan Review

Policy	Comments
Policy AR1	<p>The SDNPA have concerns regarding the proposed housing allocation for land off Ford Road, these concerns are set out below. However, it should be noted that these concerns will have implications for the proposed modified settlement boundary, which will include the allocation of land off Ford Road.</p>
Policy AR2 Housing Site Allocations	<p>The first purpose of National Park designation is the conservation and enhancement of the National Park's natural beauty, wildlife and cultural heritage. The SDNPA has an interest in Neighbourhood Plans outside the National Park that may have an impact on the setting (particularly on views towards and from the National Park, tranquillity impacts in relation to dark night sky, increase in traffic movements or recreational pressures in sensitive areas).</p> <p>i Land off Ford Road</p> <p>We welcome the reference to the SDNP in Policy criteria n. However, the SDNPA note the Arundel Neighbourhood Plan Sustainability Appraisal highlighted the potential for adverse landscape effect because of its location within the National Park. Although the Sustainability Appraisal suggests that the scale of this effect can be limited by policy requirements, the SDNPA remain concerned at its proposed allocation for the following reasons.</p> <p>Whilst we appreciate that the site falls outside of the SDNP, the SDNPA has a duty to highlight any concerns it has in relation to the setting of the National Park. The site is currently contributing positively to the landscape setting of the National Park, alongside the river and the floodplain. The site comprises a historic field pattern and to the South are the remains of a priory (scheduled monument) both of which are features of this landscape. These features contribute to the landscape sensitivity of the site within the setting of the National Park. To conserve and enhance the setting the SDNPA would expect any future development to respect the historic field boundaries within the site. The extent of development would need to follow existing contours to ensure a more characteristic relationship between the settlement and the floodplain. This is to ensure that any development respects the landscape character and minimises impact on landscape setting. However, other development constraints exist on the site. The eastern part of the site is within flood zone three, as referenced in the site assessment report. There is a powerline running along the majority of the northern part of the site which will have implications for the developable area and create a barrier to connections with the existing settlement. As a result these constraints reduce the developable area of the site. The SDNPA are concerned that existing constraints limit the ability of any future development to respect the landscape character and still deliver a viable scheme.</p> <p>The SDNPA have some additional comments regarding the calculations of the net developable area as there appear to be differences in the figures quoted in the policy and the HELAA.</p> <p>We recognise that these comments may require further clarification / discussion and we would be more than happy to attend a future meeting when the responses to regulation 14 consultation are considered by the Qualifying Body.</p>
AR6	<p>The footpath along the River Arun south from Arundel to Littlehampton (footpath 206) has not been identified as part of the Green Infrastructure Network. The SDNPA are highlighting this as this footpath has been identified in the West Sussex Walking and</p>

Cycling Strategy and is marked as an aspirational cycle route in the Arun Local Plan 2011 – 2031. It is suggested that this footpath is identified in policy AR6.

The SDNPA is committed to identifying opportunities to support the Authority’s second purpose ‘to promote opportunities for the understanding and enjoyment of the special qualities of the Park by the public’. Although the SDNPA has set out significant concerns regarding the allocation of a housing site at Land off Ford Road, we appreciate that this allocation may be progressed by the Qualifying Body, through further discussion with SDNPA officers. Should the site be progressed the SDNPA would like to highlight the opportunity for the development of the site to include a new safe off-road Public Right of Way linking east west between the existing woodland footpath network in Torrington Common and the footpath 207 which leads from Ford Road to the river, as shown in red below. This would provide residents of the new development with the opportunity to access the South Downs National Park, the River Arun and Arundel without having to resort to the private car.

