



**CONSULTATION UNDER PART 4, SCHEDULE 4, ARTICLES 18,19 & 20 OF
THE
TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT
PROCEDURE)
(ENGLAND) ORDER 2015**

**South Downs National Park Authority
Consultation Response**

Planning application consultation

Application No: AWDM/1882/16

Outline application for up to 260 dwellings with associated vehicular, pedestrian and cycle routes; parking; service infrastructure and sustainable drainage features; and strategic landscaping including noise bund / attenuation to the A27; all vehicular access to be via the strategic development to the south.

**Land To The South And East And West Of
The Coach And Horses Arundel Road
Worthing West Sussex**

The response of the South Downs National Park Authority is given in the context of the following:

‘The Environment Act 1995 sets out the two statutory purposes for National Parks in England and Wales:

Conserve and enhance the natural beauty, wildlife and cultural heritage

Promote opportunities for the understanding and enjoyment of the special qualities of National Parks by the Public

which relevant authorities (*which includes local authorities*) must have regard to in exercising their functions.

National Parks Authorities have the duty to:

‘Seek to foster the economic and social well being of local communities within the National Parks’.

in pursuit of the twin purposes above.

Following is the formal consultation response of the South Downs National Park Authority (SDNPA) on the above application.

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Historic Building/Conservation

Castle Goring itself is a Grade I listed building and sits with a designed landscape to the south. The house is within the Conservation Area, with the landscaped area now also included from May 2016, as an extension of the Conservation Area boundary following the review of the Conservation Area, under the last Conservation Area Appraisal.

For all of its life to date, the house, landscape and other associated buildings (some of which are separately listed in their own right) have sat in a rural setting surrounded by farm land and ancient woodland and this is both the historic and existing setting of the heritage assets. (The NPPF defines the setting *as the surroundings in which a heritage asset is experienced*. This 'experience' may be predominantly a visual one but not exclusively so.) Although Worthing has expanded hugely since Castle Goring was built, its edge is still sufficiently far removed to leave that rural setting largely intact.

Having looked at the potential impact of the second phase of West Durrington, it is clear that the creation of a housing estate close to the various heritage assets would adversely affect that rural setting and leave Castle Goring as the outer edge of the town.

Forest Lane gives access to Forest Barn Mews and forms a boundary to the eastern edge of the historic landscape. The unmade nature of this road and the open fields on both side produce a strong sense of 'rurality' that would be significantly undermined by the creation of a suburban residential area to the east of the lane.

Further along the path network, a path running North-South returns to the Coach and Horses. This too retains a strong rural feeling and provides views westward to the historic landscape, including the listed walled garden, and the backdrop of ancient woodland beyond. The housing development would fatally compromise these views

Landscape

The site is located adjacent to the SDNP boundary on its northern and western sides. The South Downs Integrated Landscape character assessment identifies the location as being within the Wooded Estate Downland character type- and specifically landscape character area B4 Angmering and Clapham Wooded Estate Downland.

The Key characteristics of this landscape type are noted below (copied for ease);

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Integrated Key Characteristics:

- Comprises a chalk dipslope, exhibiting a strong and distinctive topography of rolling hills, and an outlying chalk ridge at Highdown Hill, separated by a narrow clay vale.
- Slightly acidic heavy soils support large expanses of ancient woodland, much of which may have originated before the medieval period. The extensive woodland cover creates a distinctive dark horizon in views from the A27.
- Woodland, including ornamental plantations associated with landscape parks at Michelgrove and Angmering together with game coverts, is interlocked with straight-sided, open arable fields linked by hedgerows – much of this land has been rationalised since the Second World War.
- The clay vale between the chalk dipslope and the outlying chalk ridge at Highdown Hill was probably assarted from the late Saxon period onwards, producing the irregular patchwork of early enclosures still visible around Ecclesden Farm (east of Angmering).
- Bronze Age and Iron Age earthworks at Highdown Hill provide a strong sense of historical continuity.
- A low density of dispersed settlement, characterised by scattered farmsteads – most of 18th-19th century origin, with some of medieval origin representing shrunken hamlets. Chalk flint is the dominant building material, often edged with red brick.
- Medieval villages located in the dry valleys at Patching and Clapham are surrounded by groups of early enclosures.
- A deeply rural secluded landscape with large tracts devoid of roads and settlement.

Views from footpaths

These are considered in terms of views from the SDNP and also views from locations towards the SDNP where the site forms part of those views.

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Public Bridleway leading off West Hill – within the SDNP

This track leads away from Salvington Hill up into the downs; linking with the Monarchs Way and the South Downs Way National Trail to the north. It is therefore an important connection

to the SDNP and the high number of users of this track would be considered to have the highest sensitivity to changes in the views as a result of this. The proposed extension to the permitted development would extend visible development between Castle Goring, Forest Farm and the edge of Worthing to the east in a manner which would be significantly more intrusive in the middle ground of views than the existing agreed limit of development. The site is visible as a wide fieldscape in views from the PROW on the north side of the A27. The proposed bund and associated planting may screen the immediate frontages but due to the elevation of these views it is unlikely that this would be effective in screening the depth of development or the east/west extent where rooftops and built form beyond would be highly visible. These views are sequential and are experienced for a significant length of the PROW on the climb from Salvington, west of the A27. This route is also clearly visible from the site. The impact on these views is considered to be significant unless appropriate mitigation measures can be developed.

Views from PROW on the west boundary of the proposed site on the SDNP Boundary

Views towards the east along the western edge of the proposed development site are in part obscured by an intervening hedge line although this is in poor health (Dutch Elm Disease) and should not be considered to offer reliable long term mitigation. It is likely that due to the proximity of the proposals that impacts from domestic activity, vehicular movements and the presence of built form would affect the character of this area and remove the buffer function that this land currently provides to the approved scheme to the south of the proposed site. The proximity of the proposals to the PROW and the significant change in character that would result from the proposals in this location would be harmful to this length of the SDNP boundary and appropriate mitigation measures in terms of significant type and depth of landscape buffer, planting, design and layout to restrict vehicular movement in this section of the scheme would be required. The landscape buffer should be of a sufficient and significant depth and type that would provide a discernible open landscape transitional buffer from the built environment up to the National Park. It is possible that measures to reduce these impacts could also reduce impacts on views from the PROW should the scheme layout be modified to a suitable degree which should be established through an iterative Landscape and Visual Impact Assessment process.

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Views from PROW to the South of the proposed site (within the existing permitted scheme)

The path to the south of the site would be affected by the existing permissive development so any impacts would be considered in this context to some extent although clearly there are views out to the SDNP to the north from this route where gaps in the hedgerow vegetation and built form would allow. It is likely that these views would be obscured by further built form and the possible bund along the A27.

Views from the north/south PROW within the proposed development site

This footpath/track appears to be of some age being lined with mature/over mature hedgerows on both sides and has a noticeable rural character. The northern section of the PROW which runs through the proposed site currently has extensive views over the site to the west towards the SDNP and Castle Goring parkland to the west. The backdrop of ancient woodland in these views is particularly notable as a characteristic feature of the landscape area of the SDNP rising up Highdown Hill to the south. These views would almost certainly be largely obscured by built form in the proposals without being specifically designed into the scheme.

Views to the east of this PROW (south of the PH) are significantly affected by urbanising elements including rear garden boundaries, horse paddocks and visible sheds, garages and other built form.

A27 bund

The proposals include a noise bund along the A27 along the length of the site. This will be perceived as an unnatural feature alongside the A27, on the SDNP boundary and would require careful design, layout and planting to reduce impacts to an acceptable level. The layout proposals show the bund flanked by a line of housing where rooftops would be visible as a consistent line in close proximity to the A27. It is suggested that modification of the design and layout of the footprint of the bund and adjacent built form is undertaken to achieve a more natural and sensitive layout – this would be likely to assist with mitigation of views from the PROW.

Woodland

The character descriptions for this area highlight the importance of woodland as a key feature. It may be appropriate for mitigation proposals to include woodland creation as part of the site proposals.

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Dark Skies

Internal and external lighting required in connection with this proposal (including infrastructure lighting) would have the potential to have significant effects on the dark skies of the National Park. In May 2016 the South Downs National Park became the world's newest International Dark Sky Reserve (IDSR). Therefore all development should include a full appraisal of both any internal and external lighting to consider what impact such may have on the dark skies of the National Park and if appropriate if/how it can be satisfactorily mitigated to meet the lighting standards of the Institute of Lighting Professionals (ILP) for rural zones.

Policy 3 of the SDNP Partnership Management Plan outlines that the tranquillity and dark night skies should be protected and enhanced. As CPRE Night Blight evidence has shown, the gradual addition of developments on existing urban boundaries has caused a reduction in sky quality.

The impacts on the SDNP Dark Skies status should be carefully considered in the planning process. Dan Oakley dan.oakley@southdowns.gov.uk is the SDNPA Dark Skies specialist and should be referred to for advice on this matter.

Footbridge

The possible installation of an appropriately designed footbridge (perhaps a green footbridge) over the A27 to link into the PROW network in the SDNP to the north would be supported, in landscape terms the eastern site would be preferred due to its better proximity to the existing settlement and also due to the potential for visual and character impacts on Castle Goring conservation area.

Inspectors Report (2009) into the PSDNP

Following the inquiry into the designation of the SDNP, and the considerations therein about this area, development of adjoining land and Castle Goring. The relevant paragraphs are copied below;

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Inspector's comments and recommendations

- 6.6 In IR1 I concluded that none of the land east of Titnore Lane should be part of the new National Park. In IR2 I reviewed that conclusion in the light of the NERC Act, the *Meyrick* judgements and other available evidence. For a number of reasons I concluded that the boundary should be amended to now include the woodland east of Titnore Lane as well as Castle Goring and the open land to the south of it. In changing my original recommendation I gave, amongst other things, far less weight to the absence of clear downland characteristics and strong visual links to the wider Downs and more to the importance of cultural heritage qualities.
- 6.7 Although it is not entirely clear to me that the open land south of Castle Goring should be viewed as a park in terms of the specific reference to such land in section 99 of the NERC Act, the land in question certainly has a parkland appearance and, to my eyes at least, is scenically attractive. When the ancient SNCI woodland, listed buildings, conservation area and parkland landscape are taken together I am in no doubt that the additional area (6) satisfies the natural beauty test. In addition to its intrinsic qualities, it seems to me that the land in dispute is part of the continuum of high quality landscapes that link the wider Downs north of the A27 to Highdown Hill. I would add that including the open land south of Castle Goring also addresses the concern that the eastern boundary of the ancient woodland is difficult to follow on the ground.
- 6.8 As mentioned in IR2, satisfaction of the recreational opportunity test is "more problematic". There is no direct public access to this area and there is no evidence to suggest that the public will be able to access the land at any future date. That said the *Meyrick* judgement confirmed that a much more extensive tract could have national park status even if public access is not available. In effect, this means that the new National Park can "wash-over" land even though public access is absent.
- 6.9 At my site visit it was also evident that the well-used footpath that runs along the eastern boundary of this area allows striking views of the parkland landscape and the woodland beyond. Views into this area are also available from Titnore Lane itself albeit that I share SDC's view that this road does not provide an important recreational opportunity. Some long distance views may also be available from Highdown Hill and elsewhere though it was difficult to establish this with certainty at the site inspection.

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- 6.10 In the final analysis the oral and written evidence does not persuade me that the area fails the recreational opportunities test. It follows that as I consider that Castle Goring and the land east of Titnore Lane should be part of the new National Park.
- 6.11 In making that comment it is important to emphasise that the inclusion of this area should not prejudice the timing, nature or scale of the long standing proposal for a major urban extension on the adjoining land. No one suggests that it would, though the Consortium's concern on this point is wholly understandable. The fact that there is to be a 12m buffer between the edge of the development area and the proposed boundary for the new National Park provides some comfort on this point. Even so, when the National Park boundary is defined in detail, it is import to ensure that the newly protected landscape does not intrude onto land that has long been allocated for development.
- 6.12 Finally, I agree with the SDC that the additional area (6) boundary should be varied to exclude the small complex of recently constructed dwellings at Forest Farm.
- 6.13 **I therefore reiterate the recommendation in IR2 that Castle Goring and land east of Titnore Lane, Worthing, be part of the new National Park subject only to a variation to exclude built development at Forest Farm. Map 3 of the accompanying annex shows the area I recommend for inclusion in the SDNP.**

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Design

Comments are provided in support of and in response to the opportunities for mitigation identified by the SDNP Landscape Officer. Comments are limited to design considerations relating directly to impacts on the SDNP and do not provide detailed review of the design integrity of the overall masterplan.

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Western Boundary

These comments are linked to the identified landscape concerns regarding the health and quality of the existing planting along this boundary with the National Park and its ability to provide long term screening of the application site, maintain the character of the boundary of the National Park and the route along it. The SDNPA would expect to see a robust landscape strategy which supported a long term approach to maintaining and enhancing the quality of this key feature.

In addition the detailed design of the built form on this boundary should minimise its impact on the character (visual, audible, lighting impact etc) through the following;

- Ensuring a suitable set back from the boundary and the existing and enhanced planting in order to reduce visual and audible intrusion on the PROW and the NP boundary
- Ensure that units front towards the boundary in order to ensure that back gardens and associated noise and visual intrusion do not project towards the boundary
- Car access and general vehicular speeds in this area should be reduced as far as possible, ideally by ensuring that there is not continuous vehicular access along this boundary. This will reduce visual and audible intrusion on the PROW
- There should be continuous pedestrian and cycle access along the boundary within the site in order to retain the quiet character of the existing PROW by not adding excessive additional users to the route
- There should be no provision of exterior private outdoor space above ground floor level on this boundary (e.g. projecting balconies or roof terraces – limited provision of Juliet balconies would be acceptable)

Eastern PROW (within the site)

Views across the site to the west will be lost as a consequence of the proposed development, and whilst this predominant change on this long standing PROW cannot be mitigated, the detailed design of the interior of the site should facilitate glimpsed views from this PROW of the parkland and ancient woodland beyond. This visual connection would also add general value to the streetscape within the development.

A27 Bund

As set out above under 'Landscape, the SDNPA would reiterate the artificial nature of the bund and the need for innovative proposals to ensure that it has a more natural appearance. Additionally particular thought should be given to ensuring that there is not a negative impact on the amenity of the proposed units, particularly at ground floor level.

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Access and other comments

The addition of footbridges is good, although they don't connect to the PROW network. The SDNPA understand that it may be possible to realign the existing footpath on the northern western side of the A27 to align with the footpath from the south. It is also presumed that thought has been given to connecting the eastern bridge to the PROW network by creating a new permissive path or dedicated PROW?

In fact it would be better to upgrade the existing south of the A27 to a bridleway and then upgrade the existing northern side footpath to a bridleway and thus link into the Downs and Monarch's Way and thence to SDW etc...

There's also a track going through Munery's Copse to the east and up into Clapham Wood that could be used to link into the existing bridleway..

In essence, there are some obvious ways to enhance the access network that should be explored to enable people to get from the coast through to the Downs.

In conclusion, as submitted the SDNPA have identified concerns about this proposal and areas where and how the proposed development can be improved and amended in relation to the impact of the development on the setting of the South Downs National Park.

As the landscape, with its special qualities, is the main element of the nearby South Downs National Park and its setting, attention is drawn to the South Downs Integrated Landscape Character Assessment (Updated 2011) as a key document as part of the overall assessment of the impact of the development proposal, both individually and cumulatively, on the landscape character of the setting of the South Downs National Park; this document can be found at:

<http://www.southdowns.gov.uk/about-us/integrated-landscape-character-assessment>

Taking into account the above in the determination of this application, the SDNPA would also draw attention of Adur/Worthing Councils, as relevant authorities, to the Duty of Regard, as set out in the DEFRA guidance note at:

<http://archive.defra.gov.uk/rural/documents/protected/npaonb-duties-guide.pdf>

It may also be helpful to consider the development proposals in the context of National Park Circular 2010 for guidance on these issues

at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/221086/pb13387-vision-circular2010.pdf

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The SDNPA trust that the above comments are helpful to Adur/Worthing Councils in the appraisal and determination of this planning application, in consideration of the setting and special qualities of the South Downs National Park.

Any questions relating to this consultation response should be sent to:

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Planning Link Officer

Eastern Area Operations Team

South Downs National Park Authority

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Date: 24.02.2017

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