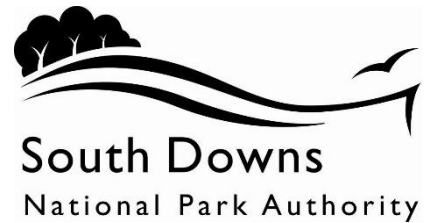


SDNPA Consultation Response
Land West of New Monks Farm
08 March 2018



Dear Mr Appleton

Thank you for your letter dated 01 August 2017, and subsequent request following the submission of additional information, requesting the South Downs National Park Authority's views on the development of Land West of New Monks Farm, Lancing (AWDM/0961/17). The purpose of this SDNPA response is to consider the impact of the proposed development on the setting and Purposes of the National Park, which are:

- 1) To conserve and enhance the natural beauty, wildlife and cultural heritage of the area;
- 2) To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

This will be to support Adur District Council in their duty to have regard to the impact of development on the Purposes of the National Park, as required under S11A of the National Parks and Access to the Countryside Act 1949 (as inserted by S62 of the Environment Act 1995).

Summary SDNPA Response

It is recognised that the application site is allocated in the Adur Local Plan, which has now been adopted. The South Downs National Park Authority does not object to the principle of the allocation and what the policy seeks to provide on the site. The SDNPA does however still have significant concerns based on how this policy has been interpreted in the current application and therefore **objects** to the proposed development on the following grounds:

- Insufficient mitigation response to the setting of and Purposes of the National Park;
- Overly simplistic approach to landscape character in the LVIA, which is considered to have led to landscape impacts being underestimated;
- Scale, appearance and form of the commercial element (and associated car park) in particular causes significant harm to landscape character and in views to and from the National Park, including heritage assets which contribute to this character, with inadequate mitigation measures proposed;
- Harm to International Dark Night Skies reserve;
- The cumulative impact of the development, along with proposed development at Shoreham Airport, on the setting and Purposes of the National Park.

These objections are set out in more detail below.

These concerns are considered to be surmountable and advice has been offered to the applicant on how this could be resolved. Despite, however, some minor positive amendments being made, the proposal has not gone far enough to resolve the harm caused to the setting and Purposes of the SDNP. The Major Adverse impact of the development on the SDNP is demonstrated in the evidence produced by the applicant, for which the mitigation measures proposed fall a long way short of resolving the identified harm. The commercial aspect, adjacent to the proposed residential scheme and the SDNP, fails to recognise this sensitive location and proposes a rather standard industrial building. Ultimately, the proposed commercial development (including the car parking) needs to be reconsidered using the evidence generated by the LVIA and guidance from the applicant's own team, particularly in terms of form, layout and treatment on the northern elevation (and potentially north-eastern corner).

During our ongoing discussions, concerns were also raised regarding connectivity between the existing residents on the south side of the A27 and the National Park being further severed and access opportunities reduced as a result of the development. The applicant has sought to overcome

this through the proposed upgrade of the public footpath to a bridleway along the west bank of the River Adur (to the south of the A27) as part of this application. A further application has also been submitted to the SDNPA on 24 January 2018 (SDNP/18/00434/FUL), to provide a Public Right of Way link from the upgraded route to Combes Road, which is currently under consideration. If approved, this will contribute significantly towards overcoming the concerns raised previously regarding access.

Summary of site

The site is located to the east of Lancing and west of the River Adur. This landscape is coastal and located alongside the Adur estuary. By virtue of this location, the landscape is naturally low-lying, the vast majority of which lies within flood zone 3. This location creates the foundation of the landscape's character as a coastal floodplain – it lies within the National Character Area South Coast Plain and Hampshire Lowlands. This landscape is one part of a series of remnants of the huge coastal floodplain encroached by expanding settlements relatively recently - over the past 90 years. This has left a series of landscape 'gaps' which characterise this stretch of coastline as a succession of 'windows' with views to the sea from the South Downs. As identified in the West Sussex County Council Landscape Character Appraisal, this site is one of these coastal gaps.

The site lies within a complex landscape displaying significant time-depth. The site includes within it evidence, and in some cases surviving landscape elements, from the early post-medieval (c.1500) period right up to present day. This however doesn't mean there are not elements surviving from before and indeed after this time – its time-depth means numerous periods are represented as elements or features within this landscape. Evidence of the medieval salt-workings remain extant within the landscape, the rifes and ditches in the landscape are associated with this activity in the early medieval period – and it is this which imbues the character of this central part of the landscape today. Recent mapping over shows these remain unchanged for over 150 years, despite some land-raising of aggregate waste.

Detailed SDNPA Response

Landscape Character

There has been an overly simplistic approach to landscape character in the LVIA, which results in an underplayed assessment of how the proposed development would impact on the setting of the SDNP. Whilst there have been some changes made to the LVIA, it remains insufficient and lacking in terms of the understanding of the relationship between the floodplain of the application site and the SDNP, as well as the cultural heritage associated with the Downs. As a result, impacts could have been either missed or reduced in severity.

The cumulative impact of the proposed development here and at Shoreham Airport also needs to be fully understood and addressed in the development proposals for both – particularly as both proposals expand the site boundaries, reducing the openness of the floodplain, which shares an important relationship in terms of understanding the landscape character of this part of the SDNP.

Views and Visibility

The residential development proposed is capable of being seen in the context of Lancing and no objection is raised to this element. The commercial building is however much larger and represents a very different form of development, in a more prominent location. The large, block style and format, clad fully using the IKEA brand colours, will further exacerbate the incongruity within the setting and character of the area and the close relationship with the South Downs. The West Sussex Landscape Character Appraisal for the coastal 'gaps' <https://www.adur-worthing.gov.uk/media/media.139364.en.pdf>, including this one, has a recommendation under land management guidance for new large agricultural/industrial building to 'carry out colour and design studies for industrial and large farm buildings'. Despite this being requested in the SDNPA's earlier comments, the SDNPA has not been able to find any evidence of the colour and design studies undertaken for this scheme. It is noted that there has been a reduction in the overall height of the

commercial building by 1m, but this does little to overcome the fundamental concerns regarding the appearance, massing and bulk of the building.

It is acknowledged that the additional viewpoints south of the application site, looking north towards the SDNP, and manner of taking the viewpoint photographs have been updated. It is also noted that the Country Park is no longer explicitly treated as a mitigating influence for the IKEA building and car park. There does remain a reliance on the 'Park' area to the east of the IKEA car park and the planting along the northern boundary of both the building and car park, to mitigate the Major Adverse impact of the proposed development. As discussed there is significant doubt that this will provide the mitigation necessary to resolve this impact.

As discussed at our meeting on 22 February 2018, the SDNPA remain doubtful that this will have the desired effect, or that planting along the northern boundary in particular would even be achievable. The tree buffer to the front of IKEA would not provide the level of screening that appears to be alluded to in the application documents. Whilst there is more substantial planting around the large car park, this will do little to reduce the impact of the vast expanse of hard surface proposed, or the glare resulting from cars parked there, in particular when viewed from higher ground within the SDNP. It is noted that indicative landscape principles have now been provided for the car park area. These do not however address the significant impact of the car park in views from the SDNP, nor how the landscape principles relate to the planting proposed around the car park periphery (as these are being dealt with by different consultants). There is also a reliance on a tree belt to the north of the weighbridge in the ownership of Highways England, for screening purposes, over which the applicant has no control. Therefore it is considered that the mitigation proposed would be inadequate and would not overcome the Major Adverse impact on the SDNP identified in the applicants LVIA.

The effect of the small area of green roof proposed at distance is lost as it will remain overwhelmed by the scale of the rest of the building and the carpark area exposed in views. Proposing such a small area is arguably a token gesture rather than a genuine attempt to minimise visual impact and improve the sustainability of the scheme. If it is not possible to provide a green roof across the full footprint, has any consideration been given to implementing a green wall on the northern edge?

Dark Night Skies

The assessment of the ambient lighting conditions is consistent with those showing on the sky quality measurements for the area and it is agreed that the general level of lighting is E2 according to the Institute of Lighting Professionals. The general area does show up as a consistent bright urban 'red' spot on the sky quality map, which also shows very little in the way of intrinsic dark skies. The main areas of darkness lies to the immediate east and west and further north, with the far eastern edge of the dark skies core (zones E0 and E1) within around 10km. From a SDNPA Dark Skies view, this area of the National Park immediately adjacent to this development and north of the A27 would be classified as a 'transitional' area between progressive darkness and urbanisation. While conditions do not suggest classification as a 'dark sky' they still remain of importance to protect from light pollution, as they act as a barrier to darker areas, and in isolated local locations, may measure favourably. Consequently, it is important that the general sky conditions do not degrade and push back these transitional areas.

It is welcomed that the development in general proposes dark night sky friendly fittings on appropriate switching and dimming modes throughout. The luminaires suggested will probably achieve E1 level of compliance and due to technological availability, it would be recommended that all luminaires achieve this grade. This is particularly easy to achieve on residential and car park lighting as much of the surrounding area will have these fixtures as design standard. The use of curfews on closing will be of great importance in this respect, and could be secured by conditions restricting the hours of operation.

The residential area should present little impact on dark skies. As there is a fair amount of housing already in the area, the addition of this housing is unlikely to significantly degrade the sky quality or the view. Providing that a suitable lighting design and regime is designed, the impact of this lighting

will be low. The housing would result in a re-zoning of the E2 to an E3 zone. The addition of a community centre and education facilities will increase the local impact, but with effective design and use this could be minimised.

The introduction of a commercial zone, however, does potentially present a threat to the general level of darkness and to the surrounding views. The resultant increase in ambient quality will have a detrimental impact on sky quality to the North and upon Lancing College. This is shown on page 18 of the External Lighting Assessment, which shows an increase reddening of the sky in the commercial area. Given that the lighting requirements of both the luminaires and the resultant surface illuminance will be significantly higher than the residential zones (30 lux rather than 10 lux) there is the potential to create a significant lighting introduction. As a comparison, 30 lux is the suggested surface illumination for an ME2/CE1 road class which aims to provide 'city centre' levels of lighting. It is therefore not unreasonable to suggest that this would mean a re-zoning from E2 to E4 (Rural to City centre) for the area. The effect of which is to place the lighting of a city centre immediately South of an area of increasing darkness with little barrier. While this may not impact on the quality of key core areas, it will inevitably reduce conditions in the National Park. It would be more favourable if the commercial zone was located further south in this respect. Therefore the lighting scheme proposed would need to be substantially revised.

Another impact is the visibility of the commercial zone. Although dark sky friendly fittings are suggested throughout, the increase in surface illumination, will create a noticeable lighting impact, particularly with the illumination of the car park, the internal spill of the shop itself and any illuminated signs, which would be more prominent. In that respect the development is more likely to stand out against the surrounding residential zones. Although the glare would probably be within ILP recommendations, the addition of a large, bright source of lighting would have a detrimental impact on the viewpoints of the South Downs which would look out on a progressively brightening urban landscape.

The additional night-time lighting survey report, which has recently been submitted does not, somewhat surprisingly, consider the impact of the proposed development. Therefore, no mitigation has been proposed to adequately address the concerns raised previously.

To summarise, the development will introduce significant new lighting that has the potential to impact on the dark skies and view within the South Downs. The introduction of a commercial zone will create city centre lighting conditions immediately adjacent to the National Park and areas of progressive darkness. While the core dark skies are located some distance and are unlikely to be immediately affected, the impact on these transitional areas is considered unacceptable, as the overall sky conditions are likely to reduce – as noted in the external plan. The residential zone impact is much less and is unlikely to significantly impact on dark skies or views. The use of dark sky friendly lighting is welcomed as this will help reduce the impact. However, the sheer illumination of the commercial zone in that area, is likely to conflict with the aims of the National Park to protect its dark skies, unless the lighting scheme proposed is significantly revised or the IKEA complex is re-positioned.

Access and Connectivity to the SDNP

The SDNPA seeks to promote sustainable travel to the National Park to reduce the impacts of traffic within it and to promote healthy lifestyles. The A27 presents a significant barrier between the population of the coastal plain and the National Park. This is particularly true for non-motorised users (NMUs) and for communities along the coastal strip including Worthing, Lancing and Shoreham. While there are some good non-motorised user (NMU) routes such as the Downs Link at Shoreham, other historic rights of way have been severed by the A27 and where crossings exist they are few and far between, often at grade and considered dangerous to use because of volumes and speed of traffic. The PROW network north of A27 includes footpaths and bridleways which link directly to the South Downs Way National Trail and to other key sites such as Cissbury Ring, but accessing these from south of the A27 is difficult.

It is noted the site allocation policy (Policy 5 of the emerging Local Plan) requires the developer to provide improved access across the A27 to the South Downs National Park for pedestrians, cyclists and equestrians. The scheme proposes the closure of the NMU crossing provision currently provided at the Sussex Pad junction, and proposes crossing provision at the new roundabout on the A27, with a shared path running along the northern carriageway in both and eastwards and westwards direction. This alone would result in a reduction in access and increased severance, which would be in conflict with the second Purpose of the National Park.

Following discussion, an application has now been submitted to the SDNPA, to provide an additional NMU route from the existing public right of way along the western edge of the River Adur to connect with the wider network at Combes Road. Without prejudice, if approved, along with the revised proposals to upgrade the existing footpath to a bridleway, this would overcome the concerns raised regarding severance. The application is still being considered and the SDNPA will continue to liaise with Adur DC and WSCC throughout the assessment. If approved, the provision and ongoing maintenance of the route would need to be secured through a S106 Agreement, or the adoption of the route by WSCC, whilst also securing appropriate signage from within the New Monks Farm development.

Traffic Impacts

It is noted that there have been concerns raised to the scheme on traffic impact grounds by both Highways England and WSCC Highway Authority, although it is understood that work has been undertaken by the applicant to address these. The SDNPA would defer to their expertise on such matters, but wish to highlight its agreement with the original comments made by WSCC and Highways England regarding development impacts, car parking and the suitability of the NMU infrastructure.

The SDNPA advocates for an integrated and joined up approach (between all parties) to the design of the mitigation for impacts on the SDNP, including NMU access to the SDNP. Any new infrastructure should be accessible to the largest possible range of users and therefore be designed to take into account the needs of walkers, cyclists, horse riders and people with disabilities.

Water Environment

The water courses affected by the development are outside of the National Park and drain into the Adur Estuary, so there is no impact on water quality in the National Park, however it is noted there are areas of important salt marsh in the estuary.

The SDNPA welcomes the retention and enhancement of open water features on the site, including the introduction of SuDS measures such as the use of swales and also incorporation of these features into the Country Park. The SDNPA would encourage use of native plant species both to create a natural environment and also as an integral part of a SuDS scheme, assisting water quality.

It will be for the Lead Local Flood Authority and AWC's own drainage specialists to conclude whether the measures proposed to address surface water drainage on leaving the site are appropriate and whether there is sufficient capacity in the current systems to cope with the additional loads.

Conclusion

For the reasons given above, the SDNPA objects to this development. We would welcome working with Adur DC and the applicant, to help secure a scheme that responds to our concerns. If you require any clarification on the points raised in this response, please contact Vicki Colwell (vicki.colwell@southdowns.gov.uk or 01730 819280).

Yours sincerely

Tim Slaney
Director of Planning

