

SDNPA Consultation Response

Shoreham Airport

08 March 2018



Dear Mr Appleton,

Thank you for your letter dated 14 September 2017, and subsequent request following the submission of the additional information, requesting the South Downs National Park Authority's views on the development of Shoreham Airport, Lancing (AWDM/1093/17). 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).

SDNPA Response

It is recognised that the application site is a site 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 to date. Following the meeting on 22 February 2018, where the applicant confirmed the intention to produce a more detailed Parameters Plan and design principles, and tabled the kinetic study, the SDNPA submits a **holding objection** to the proposed development. This is subject to ongoing work to produce this additional information, which may overcome the SDNPA's concerns. A final response will then be provided, taking any additional plans and information into account.

The concerns raised by the SDNPA, which we would request to be resolved as part of this ongoing work, are as follows:

- 1) It is noted that the application has been made in outline, with all matters reserved except access. It is considered, however, necessary to demonstrate at this stage that the application site would be capable of accommodating the proposed 25000sqm of floorspace (10000sqm above the policy requirement), without causing substantial harm to the surrounding area. It is considered that this has not been sufficiently demonstrated owing to the constraints of the site boundary location causing the floorspace to be housed in buildings of significant size and height, with no attempt to break up the mass and located long-side to the South Downs. There is little opportunity demonstrated for landscaping to mitigate the impact of the proposed development, as the type and level of mitigation planting, either on or off-site has been demonstrated to be inappropriate, owing to the sites open character.
- 2) Furthermore, as a result of the simplistic approach taken to the LVIA, the concerns for which have been fully detailed in the advice provided to Adur DC by Sheils Flynn, we don't have confidence in the landscape and visual impact outcomes identified. We appreciate work is taking place to address this and help inform the other concerns raised. The scheme will need to carefully consider and address the impact of the development in both views into and from the SDNP, including consideration of the impact and role Lancing College plays in the setting of the Park at this location.

- 3) The current scheme has not considered positive mitigation measures to address landscape and visual impacts. These should be design-led mitigation measures rather than screening that might be uncharacteristic of the area.
- 4) From a SDNPA Dark Night 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. Consequently, it is important that the general sky conditions do not degrade and push back these transitional areas. The development will introduce significant new lighting that has the potential to impact on the dark skies and view within the SDNP. While the core dark skies are located some distance and are unlikely to be immediately affected, the impact on these transitional areas is unacceptable, as the overall sky conditions are likely to reduce. The use of dark sky friendly lighting is welcomed as this will help reduce the impact. However, the sheer illumination in this area, combined with the potential for there to be significant activity during dark hours, is likely to conflict with the aims of the National Park to protect its dark skies reserve status.
- 5) The cumulative impact of the proposed development here and at New Monks Farm 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 itself shares an important relationship in terms of understanding the landscape character of this part of the SDNP.
- 6) There is also concern regarding groundwater flooding and surface water accumulation (due to the low level of site) which is proposed to be dealt with through the enhanced pumping station. The concern is that it is intended to discharge above high tide level (as opposed to the current tidal flap valve that is closed for 6 hours each tidal cycle and discharges through a small channel through the marshes). Discharging at a higher level could have a serious impact on the saltmarsh in the adjacent SSSI, causing enhanced erosion. The SDNPA would defer to the relevant statutory bodies for further advice here.

We are happy to continue to work 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