

SDNPA Landscape Officer Response to Planning Consultation

Date	11/02/2021
Application Reference	SDNP/20/05236/FUL
Description	Highway works comprising: (1) construction of a highway (a Fourth Arm) from the approved New Monks Farm A27 roundabout to Coombes Road (west) along with associated hard and soft landscaping, and: (2) closure of the existing Coombes Road (east) junction with the A27 and its replacement with landscaping.
Address	Land Adjoining the Northern Boundary of the A27, Coombes Road, Lancing, West Sussex
LPA	SDNPA
Response	Holding Objection

Summary

The scheme proposes a fundamental change in character resulting from a change of use from agricultural land to a road, leading to an intensification of infrastructure and erosion of landscape character on the edge of the National Park – a landscape that was deemed of the highest quality for inclusion in the designation.

Effects

- The proposal uses traditional highways, engineer-led design. This fails to follow the principles of Roads in the South Downs, and is contrary to SD4, 5 (landscape-led Design), SD21 and 42 b).
 - The road has not been designed for the 20 and 30mph speeds desired, therefore traffic calming, gateway signage, speed ‘cushions’, painted signage are all included. All of these contribute negatively to ‘highway’ suburban/urban character and fail to reflect the quality of the landscape within which it is proposed. SD21 is not referenced in the Environmental Statement (ES).
 - NMUs not given the priority needed – e.g. cyclists have to re-join the carriageway. Road should be designed first for NMUs, second for vehicles.
- The landscape baseline fails to identify perceptual qualities (and related policies) in the ES, e.g. Tranquillity, therefore impacts upon these qualities have not been assessed and SD7 3 has not been met.
- Landscape is assessed as having low sensitivity, but this assessment fails to acknowledge Purpose 1 which, regardless of the landscape’s sensitivity, expects schemes to conserve *and* enhance. Currently this scheme does not conserve or enhance.
- By and large, these opportunities have not been taken in this case.
 - For example, removal of non-natives or improved meaningful GI
- Mitigation measures generate negative effects or are insufficient:
 - Wildflower meadows can deliver many benefits, however here they are not addressing the effects of the scheme or its context upon the National Park designation, purposes or policies. In particular, these effects are; air pollution, noise and visual impacts of uncharacteristic infrastructure. Meadows will not adequately mitigate for these.
 - Tree planting is inadequate – based upon the loss of trees needed to facilitate the scheme and the GA Plan. Partly due to location partly due to quantity.

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- The application has yet to demonstrate it has taken ‘all opportunities to deliver’ Ecosystem Services. The Statement relies heavily upon the work of the college to generate the benefits, which as far as I understand currently continue without the 4th arm.
 - Disagree with the assessment that the SDNPA will be more tranquil as a result of this road – this result has yet to be demonstrated.
 - Drainage is proposed to be tanked underground.
- Lighting remains a concern not only from a visual impact point of view, or DNS but also in terms of road design and character – the addition of more clutter and intensification of infrastructure when experienced alongside the A27, and the continued urbanisation and negative effects proliferating along the edge of the National Park. The effects appear to have been accepted rather than attempts made to avoid, or reduce them clearly demonstrated.

LVIA

- LVIA includes reference to the Long Man of Wilmington and other wide ranging evidence not applicable to this assessment.
- The assessment of landscape quality fails to acknowledge the site was of an appropriate quality for an Inspector to include it within England’s newest National Park. It has not degraded that significantly since then.
- The LVIA refers to the site’s ‘proximity’ to the National Park. It lies within it.
- The LVIA doesn’t demonstrate how the scheme’s design has been iterated in accordance with SD4 and 5 and the GLVIA (2013).

Recommendations

In order to address the holding objection, the above effects must be tackled through:

- Road in response to sensitive location within a designated landscape – and to help people understand they are entering a different landscape at this point – not through ‘gateway features’ but through careful, sensitive and appropriate design. This should comprise interventions such as:
 - Design the road to be narrow enough to address speeding
 - Cushions and speed bumps can be removed.
 - Remove white lines on the main carriageway, retain for give way.
 - Remove unnecessary clutter – gateway/signage etc.
 - Once road is as narrow as possible, use vegetation and tree planting to produce a sense of narrowing or as interventions into the carriageway. In this scenario trees can help to deliver multiple functions and therefore achieve multiple policies, such as;
 - Sense of narrowing to address driver behaviour,
 - Wildlife connectivity (stepping stones),
 - Mitigate for visual effects
 - Tree pits within or adjacent to the highway can and should be designed to take surface water from the road and help to manage this sustainably.
 - Carefully selected tree species can help to mitigate poor air quality (SD2)
 - Character – trees can help to provide a characterful route that speaks of its wider context through location and tree species choices.
 - Designing for closed canopies across new roads can help to improve GI links to the wider landscape.
 - Go some way (depending upon design) to address noise.
 - Simple materials, lack of; kerbs, lighting and excessive signage can all help a new road integrate into its landscape context.
 - Road design needs to reflect numbers of users and road hierarchy.
- The red line is so tight it is restricting space for mitigation, let along having space to deliver enhancements. Consideration may be needed for off site enhancements such as improved

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grassland management. This should also account for Ecology requirements and consultee comments under SD9.

- Tree planting is needed between the proposed carriageway and A27 – this gap should be planted with trees and can continue to deliver a SuDS function – species should be selected because they; i) are characteristic and ii) are known to help address air pollution – the tiny particulates that are harmful to people and ii) can help manage water.
- Tree planting is welcomed, but it follows the red line to the north side of existing trees which creates an uncharacteristic boundary. Success of this planting on the northern side of existing trees is also questioned. Suggest consideration is given to replacing these with a habitat that is characteristic and needed in this landscape; arable weeds, scrub? Rough grassland? Natural regeneration?
- Functional GI links should be improved where the proposed new route will go to mitigate for existing/proposed severance. Adjacent to the Sussex Pad, the non-native hedgerow should be replaced with appropriate and characteristic planting to continue GI along this frontage. This will help the proposal achieve SD45.
- More information is needed in relation to how drainage proposed is sustainable. The site suffers severely from surface water flooding (last seen badly in 2019) and lies within flood zone 3, so expectation is for sustainable water management to play a significant role in road and open space design. Currently this is not demonstrated. Not only should LLFA policies be met, but SDNPA Local Plan Policy SD50 applies and in landscape-led design terms the expectation is for nature-based solutions that deliver multi-functional benefits in line with the CIRIA SuDS Manual.
 - The wetland meadow planting is small, located on the north side of tree planting (therefore meadow species in the long run will likely not be successful here), and is isolated, failing to connect to other water bodies or the wider landscape – 2 requirements for generating wildlife benefits.
 - SuDS should be designed to achieve water quality, water quantity, biodiversity and amenity benefits. The start of the management Train is to prevent run-off in the first place, another design reason to minimise the area proposed under hard standing.
 - *Sustainable* drainage (i.e. at surface and not piped to sewers) should be re-worked in an integrated way with road design recommendations above.
- Improved design should seek to take *all opportunities* to deliver Ecosystem Services.
- Reduction in lighting.

More information is needed on the design of retaining structures; how have they been designed to deliver multiple benefits, and minimise the effect of engineering in this location.

Conclusion

In conclusion, as a result of the direct and/or indirect negative effects upon the landscape, I have a holding objection to the proposed scheme. Design changes are needed to generate the conservation and enhancement of the landscape at this site, from a landscape character, visual and functional point of view.

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