

Horsham District Council

Our Ref: SDNP/25/03331/ADJAUT  
Contact Officer: Nat Belderson  
Tel. No.: [REDACTED]

18th September 2025

Dear Sir/Madam,

**Neighbouring Authority Consultation**

**Applicant:** Horsham District Council

**Proposal:** Adjoining Authority Consultation - Horsham District Council (DC/25/1019) - Outline planning application for up to 45 dwellings (including affordable homes) with all matters reserved apart from access.

**Location:** Land to The West of Shoreham Road, Small Dole, West Sussex,

Thank you for your correspondence received 11 August 2025, consulting us as a neighbouring authority on the above noted development proposals.

Although the application site is located outside of the National Park, the Council has a statutory duty to consider the Purposes of the National Park when making its determination.

The two statutory purposes of the SDNP designation are:

- To conserve and enhance the natural beauty, wildlife and cultural heritage,
- To promote opportunities for the public understanding and enjoyment of the special qualities of their areas.

If there is a conflict between these two purposes, conservation takes precedence. There is also a duty to foster the economic and social wellbeing of the local community in pursuit of these purposes.

Section 245 of the Levelling-Up and Regeneration Act 2023 (S.245 duty) amends and strengthens the Section 11A (2) duty of the National Parks and Access to the Countryside Act 1949 upon relevant authorities, which includes the National Park Authority itself, to 'seek to further the specified purposes of Protected Landscapes'.

The National Park's comments on the development are as follows:

I note that the application site is identified in the emerging Local Plan for approximately 40 dwellings, and that this conflicts with the allocation in the Henfield Neighbourhood Plan. The following comments do not offer an opinion on the principle of developing the site but instead focus on the details that should be considered as part of the assessment of the application.

This site is close to, and within the setting of, the National Park, the boundary of which runs along the

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eastern edge of the village. Paragraph 189 of the NPPF is therefore of particular relevance:

"Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited, **while development within their settings should be sensitively located and designed to avoid adverse impacts on the designated areas.**" (our emphasis).

Furthermore, Section 245 of the Levelling-up and Regeneration Act 2023 strengthens the Section 11A (2) duty of the National Parks and Access to the Countryside Act 1949 and requires all relevant authorities including neighbouring local planning authorities to further the National Park's statutory purposes. The first purpose is to conserve and enhance the natural beauty, wildlife and cultural heritage of the area.

The site is located to the south of the village and in on sloping land. This topography, along with other factors including distant views from the Downs as well as retention of a view cone back towards the SDNP have been stated in the D&AS and LVIA as factors that have led to the area identified for development being restricted to the lower land to the south of the site.

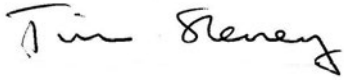
Whilst this is understood as an effort to minimise the impact on the setting of the National Park, it seems to focus on trying to minimise views of the development. However, the settlement of Small Dole itself forms part of the setting of this part of the SDNP, and a new development of this scale needs to respect the existing local settlement character if it is to integrate into the setting. As such, development may have been better focused on the eastern side of the site, closer to Henfield Road, in order to form more of a continuation of that existing settlement rather than an almost isolated projection of built form extending out to the west. Given that the rising land to the north and sensitivities of viewpoints would also remain important considerations it may be that in order to accommodate a suitably sensitive design, the quantum of dwellings may need to be reduced.

Conserving and enhancing wildlife forms part of the first purpose of national park designation and furthering this purpose forms part of the S245 duty outlined above. In addition, one of the special qualities of the South Downs National Park is "a rich variety of wildlife and habitats including rare and internationally important species". Another important consideration with regard to sensitively designing development within its setting is therefore to ensure that these habitats and species are suitably conserved and enhanced. The proposal includes open space and on-site delivery of Biodiversity Net Gain, and we would recommend that the advice of an ecologist is sought with regard to whether the proposed planting and management can deliver contextually appropriate (ie informed by the site's local ecology and native plant species) enhancement for the wildlife and habitats of the SDNP.

The South Downs National Park is a designated International Dark Sky Reserve and dark skies and tranquillity are two of the National Park's Special Qualities that need to be protected from harmful development. Paragraph 198(c) of the NPPF outlines that development should limit the impact of light pollution on intrinsically dark landscapes and nature conservation.

Development on this site should therefore have a sensitive approach to external lighting that conforms the Institute of Lighting Professionals for lighting in environmental zones, and tries to achieve zero upwards light spill in all respects. The external lighting scheme should also take into account any biodiversity sensitivities of the site and not disturb or harm wildlife. Further information/advice on sensitive lighting can be found in the SDNPA's Dark Skies Technical Advice Note which is available via the following web address: <https://www.southdowns.gov.uk/wp-content/uploads/2021/06/DNS-TAN-2021-Main-Documents-External-Lighting.pdf>

Yours faithfully

A handwritten signature in black ink that reads "Tim Slaney". The signature is written in a cursive, flowing style.

**TIM SLANEY**

Director of Planning

South Downs National Park Authority

**Contact Officer**

Nat Belderson

