South Downs
National Park Authority

Adur and Worthing

Our Ref: SDNP/25/02211/ADJAUT
Contact Officer: Abbie Sharland
Tel. No.: 01730 819 378

11th June 2025

Dear Sir/Madam,

Neighbouring Authority Consultation

Applicant: Adur and Worthing
Proposal: Adjoining Authority Consultation - Adur and Worthing Councils (AWDM/0634/25) - Erection of 1 no. internally illuminated totem sign (including removal of existing totem sign) and rebranding of a second totem sign also to be internally illuminated.
Location: Downlands Retail Park , Lyons Way , Worthing , West Sussex,

Thank you for your correspondence received 22 May 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:

The site is abuts the national park boundary. Public right of way, footpath WOG/3134/3, joins Lyons Way to the north of the site, circa 150m from the footpath. The application site also borders Dark Sky Designation Zone E1b.

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. It places a duty on relevant

authorities in exercising or performing any functions in relation to a protected landscape to seek to further the statutory purposes of the area. The duty applies to local planning authorities and other decision makers in making decisions, as well as to other public bodies and statutory undertakers. The duty to 'seek to further' is an active duty not a passive one and, if minded to approve the application, the Council should demonstrate how the S.245 duty has been taken into account.

The first purpose of a National Park is to conserve and enhance the natural beauty, wildlife and cultural heritage of the area. Development within the setting of a national park should be consistent with the section 245 duty, and Paragraph 189 of the NPPF includes specific reference to the setting of National Parks: "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 all these designated areas should be limited, **while any development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas."** It is therefore important to consider direct and indirect effects upon the National Park designated landscape **and its setting** as well as its special qualities.

The proposals include the removal of 1 No. existing totem sign, installation of 1 No. new totem sign, measuring 8000mm (H) x 2500 mm (W) x 400mm (D) and the rebranding of an existing totem sign, whereby the existing structure will be retained, with all cladding to be removed to incorporate updated tenant logos and the incoming occupier's branding. The application site relates to Downlands Retail Park, Worthing. The site is located on Lyons Way in Worthing, situated just off the A27. The Retail Park forms part of an established retail destination, serving the needs of shoppers within the local area. It is considered that the proposal will not impact the setting of the National Park as area is characterised as a retail destination and the proposal reflect the character of the area.

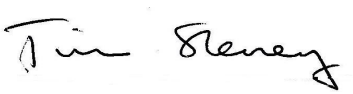
The submitted details state that the totems are proposed to include a single sided LED backlit signage box, with black steel trims, with lux levels in this low brightness environment at 100 lux, maintained between the hours of 07.00 and 23.00.

Due to its proximity to the Dark Sky Designation Zone E1b it is recommended that consideration be given to dark night skies, which are a special quality of the National Park. The South Downs National Park is a designated International Dark Sky Reserve and dark skies, and tranquillity are a special quality of the National Park which need to be protected. Transition Zone E1b is an area that lie between dark zones and the urban environment and measure between 15 and 20 SQM. Conditions in this zone will be variable but most rural areas will measure near to the 20 SQM darkness limit. While the skies are relatively brighter it is still important to reduce light pollution as these areas have the potential to become dark zones in the future.

Whilst there is likely to be pre-existing lighting associated with the employment uses in the locality, the SDNPA would encourage any new development to have a sensitive approach to light. The South Downs National Park, Dark Skies Technical Advice Note Version 2 (2021) (TAN) gives guidance on illuminated advertisements and consideration should be given to National Park purposes and every effort taken to reduce light pollution.

As long as the development meets the guidance, as set out in the Dark Skies TAN, then the authority would raise no concerns.

Yours faithfully



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