

**Agenda Item 10**  
**Report PC25/26-37**

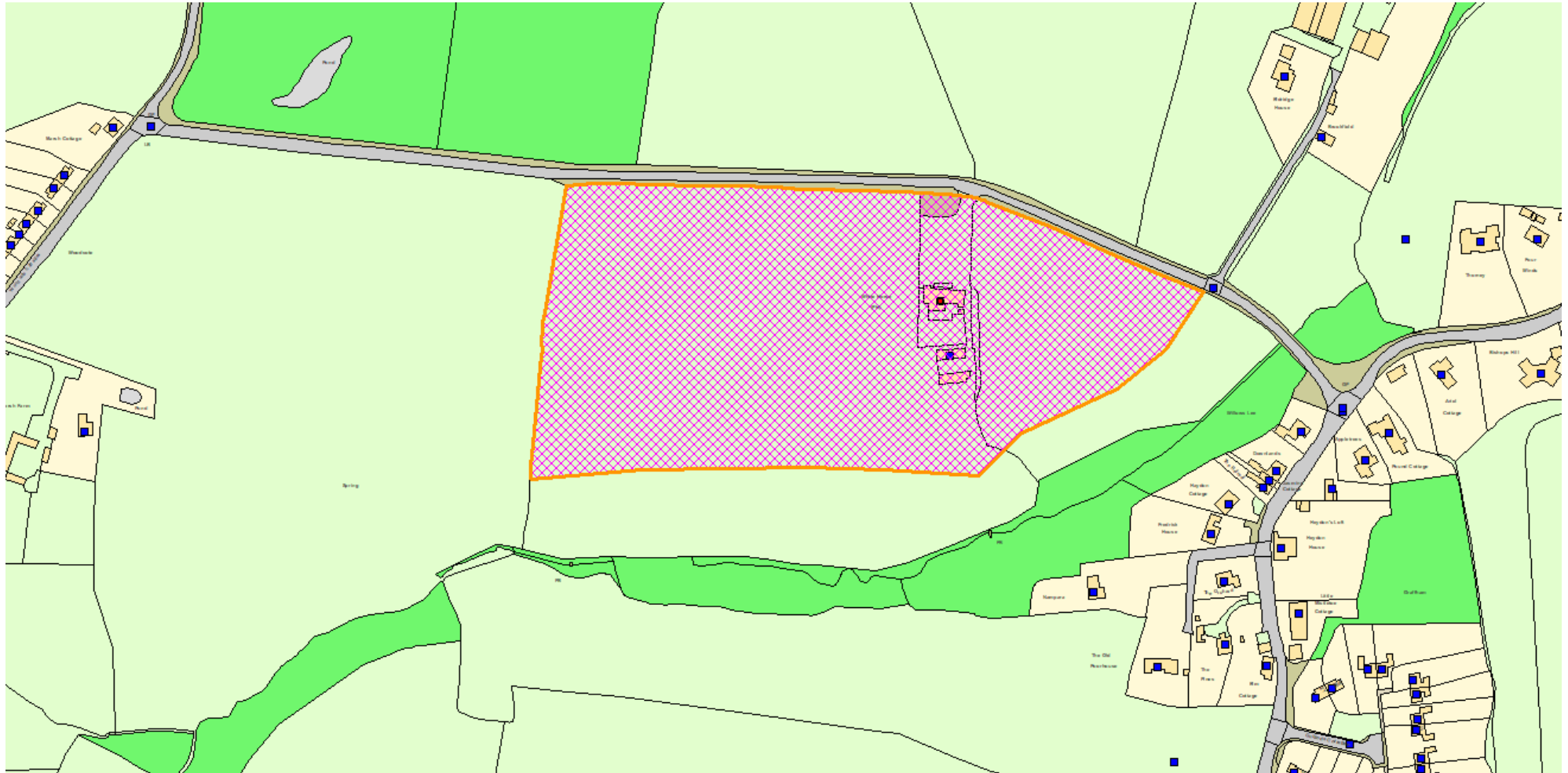
Report to	<b>Planning Committee</b>
Date	<b>12 February 2026</b>
By	<b>Director of Placemaking</b>
Local Authority	<b>West Sussex County Council</b>
Application Number	<b>SDNP/25/01323/FUL</b>
Applicant	<b>Ledmore Capital</b>
Application	Extension and remodelling of the existing pub and guest rooms to provide a bistro, restaurant, and 16 guest bedrooms in detached lodges, with associated works including extending the car park, EV charging facilities, sustainable land and water management measures, native tree and hedgerow planting.
Address	The Woodcote, Woodcote Lane, Graffham, West Sussex. GU28 0NT

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**Recommendation:**

- 1) That Planning Permission be granted subject to the conditions set out at paragraph 8.1 of the report, and any amendments or other conditions required to address technical matters.**
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### Site Location Map



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## Executive Summary

### Key Matters

- This application relates to the pub formerly known as The White Horse and now known as The Woodcote, in Grafham, West Sussex.
- The pub is operated as a bistro/restaurant and benefits from a large car park at the front of the site, modern extensions to the rear and side.
- The site also hosts two (modern) brick and flint buildings with slate roofs to the rear of the pub, these house the 6 bed and breakfast units granted consent in 2009. The application proposes that these be demolished.
- Public footpath number GRA/959/1 runs down the site's eastern boundary. The formal route of this footpath is retained and other options for pedestrians are given, as discussed further at paragraph 3.13 below.
- The proposals are described in full below. Briefly these entail the provision of new buildings to the rear and west of the existing pub building, to include a restaurant and kitchen extension to the pub, and 16 new rooms in separate lodge buildings to the rear. This would increase the tourist accommodation at the site from 6 to 16 units.
- Also proposed is an extension to the existing car park to allow additional overflow parking to the west of the current chestnut pale fencing.
- Members should note that revised drawings have been submitted and a re-consultation exercise has been undertaken. It should be noted that the design officer now supports the scheme although the landscape officer maintains an objection. The proposals section of this report sets out the scale of development in light of these revisions and touches upon the changes made.
- Overall, the scale and design and layout of the proposed development is now considered acceptable, and the scheme is considered to respect the character and materials of the existing pub building. Ecosystems services measures and on site BNG are achieved, through additional tree and hedge planting, a better mix of grassland planting and the creation of a pond.
- Notwithstanding the concerns of the Landscape officer, on balance it is considered that the proposals comply with the policies of the park, offer material benefits in terms of BNG and tourism and that a reason for refusal on landscape impact would be difficult to sustain in this instance.
- As a whole the scheme complies with the policies of the Local Plan and the Purposes of the Park. It enhances through the removal of the unattractive pub plant and ad-hoc extensions to the rear of the existing building, it conserves by maintaining the appearance of the pub as an isolated building in the countryside when seen from the wider public environs and also provides enhanced biodiversity net gain and ecosystems services improvements. The lighting scheme is considered to be an improvement upon the existing situation and complies with the Dark Night Sky Technical Advice Note (TAN). Additionally, by providing further tourism accommodation and encouraging access into the Park it will promote opportunities for the understanding and enjoyment of the Park in accordance with purpose 2.
- The scheme is before Members due to the amount of public interest in the case.

### **Site Description**

- 1.1 The Woodcote (formerly known as the White Horse) is a public house situated to the west of the village of Grafham on Woodcote lane. The pub sits within approximately 6.7 hectares with thick hedges running around the perimeter of the site. The main pub building is two-storeys in height with single storey extensions to both sides and the rear. The elevations have a white render finish and the main roof form, and those of the side extensions, is pitched, with slate tiles. The existing guest accommodation to the rear of the site comprises two single storey pitched roof buildings finished in flintwork with brick plinths and slate roof

tiles.

- 1.2 The pub is located behind the central stretch of the distinctive chalk ridge of the South Downs, on the border between the western weald and the scarp slope, in the Rother Valley Mixed Farmland and Woodland Vales Landscape Character Area. The site is within the Dark Night Sky Rural Core – zone E0, areas where the sky has been classified as intrinsically dark and is also in an area of ‘high tranquillity’. The pub is outside of the settlement boundary, not listed and nor is it located within or near to a conservation area.
- 1.3 The site is accessed via a short driveway directly off Woodcote Lane, the visibility splays here are wide and a clear view both ways is possible when exiting the site. The existing car park has space for approximately 40 cars, although these spaces are not marked.
- 1.4 Woodcote lane is a quiet, rural road, used by pedestrians, cyclists and horse riders. Footpath GRA/959 runs from Meadow Farm to the north of the site, past the Woodcote and into Graffham to the southeast. Footpath GRA/958 runs to the south of the site between Graffham to the southwest.

## **2. Relevant Planning History**

- 2.1 Planning permission was granted in 2007 for 6 bed and breakfast units to the rear of the pub, reference 07/03225/FUL
- 2.2 Planning permission granted in 2009 for 6 bed and breakfast units to the rear of the pub, reference 09/02868/FUL.
- 2.3 The applicant has undergone pre application discussions with the Authority (SDNP/23/05058/PRE) and this was issued in July 2024. This pre application submission sought advice on the creation of a hospitality venue including an expanded pub and restaurant, tourist rooms and lodges, walled garden and green house and landscape design. The pre application submission proposed a far greater encroachment into the surrounding agricultural field in terms of built development than the submission which is now before members.
- 2.4 The conclusions of this consultation were that environmental benefits *could* accrue in terms of a site wide landscape scheme and restoring the pond for example. However, these benefits were considered to be outweighed by the likely landscape harm identified in the advice and the applicants were advised that on balance, officers were unlikely to support the scheme as proposed at this stage. The advice noted that there may be some scope for a range of buildings south of the pub but not of the scale as shown during this pre application submission.
- 2.5 The submitted application aimed to respond to the pre application comments but, as outlined below, officers still considered the amount of development proposed excessive in this landscape context and therefore, as set out below, the proposals have been revised during the course of the application.

## **3. Proposals**

- 3.1 The application now before members proposes to expand the facilities available at the Woodcote by providing a bistro in the historic pub and creating a new restaurant and private dining area in a new building attached to the pub. It is also proposed to provide 16 lodge rooms to complement the new restaurant and facilities and to expand the car parking to facilitate the expanded use
- 3.2 The application as submitted proposed a reduced form of development from that shown at pre application stage, it sought to keep the tourism lodges to the south of the existing building rather than allowing these to extend significantly westwards as shown as pre application stage. It also removed the previously proposed built form and envisaged car park as originally shown within the field to the east of the existing pub and lodge rooms.
- 3.3 However, despite the positive changes made since the pre application submission, officers still considered that, upon receipt of the application now before members, the extent of development proposed could have an adverse impact upon the rural character of this part of the Park and changes to the scheme were requested.

- 3.4 The applicant has submitted revised drawings during the course of the application and changes have been made to reduce the size of the car park, remove the previously proposed sweeping access arrangement, remove the outbuildings and walled garden and to simplify and reduce the level of proposed planting across the site. More minor changes have been made to the proposed rear extension; whereas this originally almost wrapped around the rear of the existing pub, it now connects to this building at just one point to the rear and has been pinched to allow the front elevation of the existing building a greater prominence in the landscape.
- 3.5 Officers consider that the changes made are positive and result in a more modest scheme, which maintains, from public vantage points, the visual appearance of the pub being an isolated property in rural surrounds.
- 3.6 The scheme now before members proposes the demolition of the existing modern bed and breakfast accommodation to the rear of the site, the removal of all the existing single storey (flat roofed) rear and side extensions and the unsightly plant (commercial extract ducts) attached to the public house.
- 3.7 It proposes the expansion of the car park from approximately 40 spaces to approximately 65 spaces. The additional spaces will be located to the west of the existing car park in an area designed as an overflow car park. The proposed surface is grasscrete and new hedging will screen cars from wider views.
- 3.8 A large extension is proposed to the rear of the public house, this is connected to this building via a glazed link. All back of house facilities, including the kitchen, laundry rooms, wine cellars, lodge room entrance, bar, library and staff rooms are located in this extension. This extension will have 3 extruded pitched roof forms over the parts of the ground floor (the cold storage area, the laundry, storage, staff and security areas and the private dining room). These extrusions are steeply pitched and designed to emulate traditional barn roof forms. Two of these protruding structures (those over the back of house areas) will be slate roofs and the third (over the private dining area) has a clay tile roof. The remainder of the proposed extension to the pub is a single storey and capped with a green roof. It should be noted that there are two rooflights in the structure, these are over the restaurant entrance and the kitchen. The large nature of the extension means that there will be a seamless provision of services, all under one roof to serve both the new restaurant, the existing pub/bistro and the tourist accommodation behind.
- 3.9 In addition to the extension a new 'barn' structure is proposed to house the new restaurant, this is located on the rear western side of the site and is a single storey flint structure with north facing 'slot' windows, south facing glazing and timber louvres and a steeply sloping pitched 'barn' roof designed as a traditional tiled roof. This structure is connected to the above mentioned extension and the pub.
- 3.10 The proposed new 16 units of tourist accommodation are separate from the extended pub and located to the south of the site. The northern and eastern lodge buildings are two storey and each contain 2 x 1 bedroom units on the ground floor and 2 x 1 bedroom units at first floor level. These buildings are formed of flint with vertical cladding and slate roofs.
- 3.11 The remaining 8 tourist units are accommodated in the single storey buildings along the western and southern boundaries of the site. These buildings are constructed of flint with each unit having access to a 'garden room' via glazed sliding doors. These garden rooms are set higher than the land and rest on stilts approximately 500ml from the ground level of this particular part of the site. Drawing number 222.51.41000.SEC Rev 02, Proposed Long Site Sections AA best shows this arrangement.
- 3.12 The proposed new restaurant can be accessed via the pub or via the main entrance along the west facing elevation. Both this entrance and that of the lodges can be accessed directly from the car park, via a self-bound gravel footpath which leads directly from the car park. This is designed with a gentle gradient in order that the entire site (bar those lodges at first floor level) is wheelchair accessible. A planted fire road is shown on the submitted drawings, this is required to ensure fire service access to the lodges. It is proposed that this will be a

reinforced (with wire mesh) grass track and will be screened by the proposed hedgerow planting.

- 3.13 No footpath diversion application has been submitted in relation to this application and the formal route of the existing public right of way is maintained on the same line. It should be noted that, in reality, this route currently diverts through the field rather than past the back of house of the pub, which is the formal route. This application seeks to establish a permissive route through the field, so that users of the footpath have a choice of the formal public right of way or the permissive route. This will be formalised through the submission of a permissive path agreement via condition 24. The applicant is open to the formal diversion of the Public Footpath via the current informal route, however this would be a separate application for the consideration of the Authority at a later date.
- 3.14 As noted within the sustainability chapter of the submitted Design and Access statement; low carbon materials have been specified wherever possible and it is envisaged that material from the demolition of the buildings to the rear will be used where possible in the new buildings. These intentions are secured by conditions 8 and 9 to ensure the development achieves BREEM excellent.
- 3.15 Operational energy is reduced through high performance fabrics with the thermal resistance designed to exceed part L of the building regs and has been designed to achieved BREEAM NC Ene 04 (passive house design analysis) and will use air source heat pumps. EV charge points are provided at a ratio of 1 every 5 spaces and the applicant proposes to use an electric van to collect guests from local transport hubs. These details are also secured by conditions 8 and 9.
- 3.16 In terms of eco-systems services measures the application proposes additional tree and hedge planting across the site, some of these new hedges are located where the historic hedgeline would have formerly divided these fields.
- 3.17 As noted within the BNG statement the scheme proposes a 58.24% gain in area habitat units, 105% gain in hedgerow units and 49% gain in watercourse units. These are secured by the standard conditions 20, 21 and 22
- 3.18 The application also proposes to bury the overhead power cables that run southeast to northwest across and south west to northeast (see page 29 of the Design and Access Statement) across the site and the SE 'undergrounding plan'. This plan is agreed with SSE and the applicant has committed to undertake the works. Condition 23 secures the undergrounding.
- 3.19 A revised Flood Risk and Drainage Assessment is submitted and proposes an unusual scheme, with depressions in the adjacent field designed to accommodate excess water run off from the scheme. Whilst the authority supports the landscape led intentions of the scheme there still remain some concerns regarding detail and therefore a final SUD's scheme is requested via Condition 11.
- 3.20 A lighting assessment is submitted with the application which predicts the impact of the scheme as neutral/not significant on the Dark Sky Core. A detailed lighting scheme, to be designed in accordance with this assessment, is required by condition 13.

#### 4. Consultations

- 4.1 **HCC Ecology:** no objection subject to conditions.
- 4.2 **Naturespace:** No objection subject to conditions.
- 4.3 **Southern Water** – No objection.
- 4.4 **West Sussex County Council (WSCC) Highways** - No objection.
- 4.5 **West Sussex County Council Flood Risk, Lead Local Flood Authority (LLFA)**
- Further information required.
- 4.6 **Officer note:** At the time of writing an updated flood risk assessment and drainage scheme had been submitted and WSCC consulted. Members will be advised either via the update

sheet or verbally as to any further consultation responses from the LLFA. At present it is considered what is provided is enough to provide officers and members with the assurance that an acceptable scheme is possible for this site given the fairly unconstrained nature of the land immediately around the site and the fact the applicant also owns this land – which can therefore be used for sustainable drainage solutions Condition 11 requires an updated flood risk assessment and sustainable drainage strategy prior to the commencement of development.

4.7 **SDNP Design Officer** - No objection, requires conditions.

4.8 **SDNP Landscape officer** – Objection.

- Originally objected to the proposals and, whilst welcoming the improvements to the car parking area still maintains an objection on the grounds the proposals are still not landscape led and that the extension negatively impacts the historic pub which is a key feature in the landscape and contributes to the landscape character of the site.

4.9 **Officer note:** The landscape officer has been formally reconsulted in relation to the recently received amendments to the scheme and any further comments will be provided to members via the update sheet.

4.10 **Dark Night Skies:** No objection.

- “to summarise, the proposal will have some impact on sky quality from the increase in buildings/glazing and increased luminaries. However, due to compliant lights it is likely that the overall visual impact will be improved due to the use of poor lighting, which already reduces sky quality”

4.11 **Officer note:** Updated drawings and an updated lighting assessment has been submitted. These include timber louvres and overhanging roofs as well as timed black out blinds to address Dark Night Sky requirements, additionally condition 13 requires the submission of an updated lighting scheme be submitted in order to ensure appropriate lux levels and shielding methods are used to preserve both dark night skies and the foraging habits of protected nocturnal species.

4.12 **Chichester District Council Environmental Protection;** No objection.

**SDNP Economic officer** - Support

- “Holiday accommodation is underrepresented within the SDNP Visitor Economy at 5%. Therefore, more must be done to encourage greater numbers of overnight stays, which inject on average, 75% more into the local economy than a day visitor.”

4.13 **Natural England:** Comment

- “Further information required - potential water supply impacts to Arun Valley Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site. This development site is within the Sussex North Water Supply Zone.”

4.14 **Officer response:** this comment is no longer relevant following Natural England’s withdrawal statement on 31 October 2025, confirming that its Water Neutrality Position Statement of September 2021 has been withdrawn. This follows the agreement between Southern Water and the Environment Agency that a licence cap on water abstraction will ensure with sufficient certainty that development will not adversely impact the protected Arun Valley habitats. This means that development within the Sussex North Water Supply Zone is no longer required to demonstrate that it is water neutral.

4.15 **Graffham Parish Council:** - Initial objection raised on the grounds outlined below. It should be noted that Graffham PC were reconsulted when the revised drawing set was submitted and that any further comment from the Council will be reported via the update sheet or verbally.

- The proposal is of a scale and intensity unsuitable for this location and fails to conserve or enhance the special qualities of the National Park.

- The proposals conflict with Southdown's Policies SD1, SD4, SD6, SD7, SD9, SD19, SD23, SD25, and SD43. The development also conflicts with the National Planning Policy Framework (NPPF) paragraphs 189 and 190.

4.16 **Officer response:** The scale of the proposals has been reduced during the consideration of the application, and it is now considered that they can be supported. Whilst it is accepted that the application will change the nature of the pub and its immediately surrounding environs, it is not considered that the impact of this change would be so great as to warrant a refusal of the proposals. This is further discussed in the assessment section below.

## 5. Representations

5.1 At the time of writing 122 letters of objection and 12 letters of support have been received in relation to the application.

5.2 Letters were also received from;

- **Council for the Protection of Rural England: Objection**, outside of the settlement boundary and contrary to SD25. Contravenes SD4 and SD19 and relies upon the private car in an unsustainable location. Will also adversely impact dark night skies and be contrary to SD8.
- **Friends of the South Downs: Objection**, Significant increase in building form and footprint with a more dispersed layout resulting in greater visual intrusion. Unsustainable development contrary to local plan and also concern regarding the impact on Dark Night Skies

5.3 Collectively the objections received to date raise the following matters:

### 5.4 Scale and mass & design

- Development should be within the scale of the existing footprint
- Inappropriate and overdevelopment
- Inappropriate design – flat roof does not respect farmstead character

5.5 **Officer response:** Whilst the proposed extension is a large building mass when seen in plan form, in terms of its perception 'on the ground' it is, due to the detailed design, use of materials and extruded roof forms, seen as a collection of smaller buildings which sit fairly quietly in the landscape.

### 5.6 Highways & Parking

- Graffham Parish Council is working to reduce speed limit from 40mph to 20mph, this development will counter the effects the community is taking to improve safety on its roads.
- Disproportionate increase in traffic at unsociable hours.
- Delivery lorries will cause disruption.
- WSCC highways assessment of the proposals is not fair and reasonable.
- Already congestion in the village and this will make it worse.
- Drivers go at speed down Woodcote Lane.
- Heavy site traffic during construction.
- Roads are too narrow for additional traffic.
- Traffic assessment is flawed.
- The applicant presents below-industry levels for the covers on the restaurant and occupation of the accommodation. This results in the applicant presenting low vehicle trip counts, low levels of parking required, low water utilisation, low noise and light levels, low impact on the entrance to the establishment.

- Event parking not considered.
  - Increase in traffic.
- 5.7 **Officer response:** There is no objection from the Highways authority to the proposals and the SDNPA highways officer considers the submitted traffic assessment sound, including health and safety matters. The numbers of anticipated users predicted are considered appropriate given the desired end customer and sought after credentials. Notwithstanding this condition 17 is recommended limiting the number of covers to 80 and condition 15 restricts the use of the building to that which has been applied for and for no other use within that class.
- 5.8 The pub is already in operation under normal licensing hours and the proposals would allow for an additional 25 spaces within the overflow car park. It is not considered that the application would give rise to a disproportionate amount of traffic at unsocial hours. Whilst the application is likely to result in some increase in traffic along Woodcote Lane it is not considered that this would be to such an extent as to justify refusal on these grounds.
- 5.9 Whilst event parking has not been considered, the description of development and submitted supporting documents do not propose that this will be an events venue. Condition 17 is constructed so that the maximum number of covers at any one time can be 80 therefore, even if the restaurant were open to members of the public and an event happening in the private dining area, no more than 80 people could be using the restaurant/pub at any one time.
- 5.10 Tranquillity & Landscape Character
- Loss of ‘openness’ which is a feature of this landscape.
  - Loss of historic and cultural heritage (the long standing identity and nature of the White horse).
  - Will adversely affect views.
  - Contrary to SD6, SD7 and SD23.
  - Area to be developed is a wet meadow outside settlement boundary.
  - Screening of car park will spoil views of downs.
  - Degrades tranquillity of public right of way.
  - Will destroy peace and quiet.
  - Scale form and intensity of proposed development would result in a harmful impact on the character and appearance of the landscape the experience of the surrounding public right of way and the quiet rural setting of this part of the park.
  - Change in views to Downs.
  - Will cause light and noise pollution.
- 5.11 **Office response:** The Woodcote pub has been a public house since the late 1800’s and is an established building in this landscape. It was formerly a smallholding with barns to the rear, and some of the representations submitted reference a small dairy to the rear. The landscape has changed over time and the hedges were removed leaving the pub isolated in the surrounding fields and seen against the backdrop of the steeply rising downs to the south.
- 5.12 The proposed alterations will again change the character of this part of the park, and the applicant proposes to reinstate the former hedge lines as well as plant additional trees. Formerly a large kitchen garden was included in the proposals however this has subsequently been removed. It should be noted that such a use would not, in any event, require planning permission as it is considered to be an agricultural use.
- 5.13 The pub is most visible from Woodcote Lane and from footpath (GRA 959 (that runs along the eastern side of the site). The set back of the proposed extension from the rear of the

existing pub and the detailed design of the structure proposed means that the pub remains in the foreground of the landscape and the additional forms remain subservient to this. Additionally, because all the proposed new buildings are to the rear of the existing building, the activity also takes place to the rear the building, shielded from view, which assists with the perception of rural isolation being retained.

- 5.14 Overall the wider landscape will be conserved and the change brought about to this parcel of land by the proposals will only be noticeable when in the immediate environs of the site, as one moves through the landscape, either on foot, horseback or within a vehicle.
- 5.15 The submitted lighting scheme is considered an improvement on the existing situation and condition 13 seeks an updated scheme to further improve this situation. The applicant has considered light pollution and proposed combination of blackout blinds and sliding timber louvres to aid in screening glazing.
- 5.16 Viability
- No evidence to substantiate need.
  - Will result in unfair competition to local businesses.
  - Small village cannot support and extra pub.
  - Viability – would not be viable if current owner sold it.
- 5.17 **Officer response:** Whilst sometimes a consideration in planning, viability is not a consideration for this application. There are no policies within the local plan which require proposed new tourism and restaurant uses to demonstrate viability.
- 5.18 Sustainability
- Unsuitable and unsustainable.
  - Demolition of useable buildings is unsustainable.
  - Remote and unsustainable location.
- 5.19 **Officer response:** This is considered further under the analysis of D23 below.
- 5.20 Ecology & Wildlife
- External lighting will disrupt foraging patterns.
  - Proposed biodiversity net gain is not site suitable and not properly considered. Mature trees are referred to but not shown.
  - Will increase collisions between deer and traffic.
  - Increased traffic will increase toad mortality.
  - Will buried power line impact chalk stream?
  - Water courses must be protected.
  - The proposed tree planting, heritage orchard, will completely change the already established biodiversity of the area and affect the natural balance of the local ecosystem. The impact to the numerous local streams and water courses caused by the proposed development must be considered.
  - Contrary to NPPF paragraph 187.
  - Does not comply with statutory purposes of the park or the duty.
- 5.21 **Officer response:** The HCC Ecology officer has no significant concerns regarding the application and recommends that the proposed BNG is achieved via a habitat management gain plan, in this instance secured by conditions 20, 21 and 22. Following comments from the lead local flood authority and from the ecologist the applicant has made changes to the scheme to take into account the nearby watercourses and the submitted SUDS scheme shows the application site retaining water on site in a flood event through large, but shallow

basins in the adjacent field. The BNG scores are substantially in excess of those required by policy and these, coupled with required Dark Night Skies (DNS) compliant lighting scheme are material benefits of the scheme.

5.22 Miscellaneous

- The pleasant sounding kitchen garden will need high barrier fencing against the local deer population if it is not to be eaten, and this kind of fencing does not get mentioned or appear in the designs. This may be deliberate or just naivety. Either is worrying.
- Alleged Conflict of interest because the applicant supports the South Downs Trust which is financially supported by the SDNPA.
- British Horse Society – objects on grounds that increase in vehicular movements from additional facilities will have a detrimental impact on the safety of equestrians using the surrounding roads, and also on the grounds that the proposed events could lead to additional fireworks which will have a detrimental impact on horse welfare.
- Loss of privacy, specifically to ‘Nampara’.
- Will exacerbate drainage issues in the village.
- Noise during construction.
- Sky high prices will not serve local community.
- Quite a few guest houses, too large and will be used for weddings.
- Does not meet water neutrality.

5.23 **Officer response:** As noted above the kitchen garden has been removed from the proposals and is, in any event, beyond the control of the planning system. The concerns of the British Horse society are understood and officers are sympathetic to them, however there is no objection from the Highway Authority in relation to the impact of the proposals on the rural road network and a reason for refusal on these grounds would therefore be difficult to substantiate. The use of fireworks and the price of the menu is also outside of planning control. ‘Nampara’ is to the south of the site, 100 metres away and it is not considered there will be any loss of residential amenity to this property as a result of the development.

5.24 Water neutrality is no longer a consideration following the statement from Natural England.

5.25 **There have been 12 letters of support in relation to the proposals, these note that the proposals;**

- Will improve hospitality offer in the area.
- investment in area supported.
- Will support employment and training.
- Modest number of lodges.
- Will bring tourists.
- Will turn wasted land to a purpose.
- Two local pubs in Graffham were unsustainable, this provides a solution.
- Will increase biodiversity.
- Will bring local jobs for both young and not so young.
- Will allow others to access the park.
- Will preserve the pub so it doesn’t go derelict.

6. **Planning Policy**

Emerging Local Plan

- 6.1 The South Downs Local Plan is undergoing a period of review, and the First Publication (Regulation 18 Consultation) took place in 2025, with future consultation planned to take place in Summer 2026. Currently the emerging Local Plan does not carry weight in decision making. As it progresses through the adoption process, it will gain more weight for the purposes of decision making.

Local Nature Recovery Strategy (LNRS) (See Appendix I)

- 6.2 The Local Nature Recovery Strategy (LNRS) for Hampshire was published on 8 December 2025 and is a material consideration, especially where the development plan pre-dates the publication of an LNRS. For the purpose of determining planning applications, the LNRS provides guidance on biodiversity priorities and measures to be incorporated into development proposals. This proposal accords with the LNRS through the landscaping and ecological mitigation proposed.

The South Downs National Park Partnership Management Plan 2026-2031 (See Appendix I)

- 6.3 The Environment Act 1995 requires National Parks to produce a Management Plan setting out strategic management objectives to deliver the National Park Purposes and Duty. National Planning Policy Guidance (NPPG) states that Management Plans “contribute to setting the strategic context for development” and “are material considerations in making decisions on individual planning applications.”
- 6.4 This document was adopted by the National Park Authority on 9 December 2025. The Plan sets out a Vision, Outcomes, Policies and a Delivery Framework for the National Park over the next five years. Relevant Policies include;

- Aim 1 - Nature Recovery
- Aim 2 - Climate Action
- Aim 3 - Clean Water
- Aim 7 - A Thriving Rural Economy

- 6.5 The most relevant policies of the adopted South Downs Local Plan (2019) (a longer list of other relevant policies and applicable legislation can be found in Appendix I)

Core Policy SD1 - Sustainable Development

Core Policy SD2 - Ecosystems Services

Strategic Policy SD4 - Landscape Character

Strategic Policy SD7 – Relative Tranquillity

Strategic Policy SD8 – Dark Night Skies

Strategic Policy SD9 - Biodiversity and Geodiversity

Development Management Policy SD11 - Trees, Woodland and Hedgerows

Strategic Policy SD19 - Transport and Accessibility

Strategic Policy SD20 - Walking, Cycling and Equestrian Routes

Strategic Policy SD23 - Sustainable Tourism

Strategic Policy SD17 - Protection of the Water Environment

Development Management Policy SD50 - Sustainable Drainage Systems

- 6.6 Most relevant sections of the National Planning Policy Framework 2024

Section 6: Building a strong, competitive economy

Section 12: Achieving well designed and beautiful places

Section 15: Conserving and enhancing the natural environment.

## 7. Planning Assessment

### Principle of Development

- 7.1 The proposal is not considered to constitute major development for the purposes of policy SD3 and paragraph 190 of the NPPF. The NPPF accompanying footnote 67 advises that 'major development' in designated landscapes is a matter for the decision maker, considering its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.
- 7.2 In this case, the proposal is to expand an existing building, and the proposed new structures are relatively discreet in broad landscape terms. Whilst glimpses of the extended car park and the buildings behind the existing pub will be visible in the landscape these glimpses are limited and only form a short experience of the landscape for an individual moving through it.
- 7.3 The site lies in the countryside outside of the built-up area boundary where the countryside protected for its own sake. Paragraph 88 of the NPPF seeks to support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new buildings, and the development and diversification of agricultural and other land-based rural businesses. Sustainable rural tourism, which respects the character of the countryside, is also supported, including the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities.
- 7.4 Paragraph 7.10 of the Local Plan notes that Policy SD25 acknowledges exceptional circumstances whereby development outside settlements may be acceptable and goes on to state that other exceptions to the development strategy are set out in other policies in this Local Plan, for example Policies SD23: Sustainable Tourism.

### Sustainable Tourism

- 7.5 The development proposes the creation of additional tourism and leisure. Strategic Policy SD23 relates to the sustainable delivery of development proposals for visitor accommodation, attractions and recreation facilities.
- 7.6 The policy outlines a range of criteria to assess proposals for tourism uses including additional accommodation and states (SD23(1)); "Development proposals for visitor accommodation, visitor attractions and recreation facilities will be permitted where it is demonstrated that:
- a. The proposals will provide opportunities for visitors to increase their awareness, understanding and enjoyment of the special qualities.
- 7.7 **Officer response:** This criterion can be met, the application documents state the applicants desire to create a green Michelin Star restaurant with a strong focus on local sustainably and food production. The applicant intends to make visitors aware of the special status of the South Downs National Park and to encourage visitors to increase their awareness, understanding and enjoyment of the special qualities. Condition 4 seeks the submission of a visitor information pack for further approval by the Authority. This will seek to make visitors aware of the special nature of the South Downs and how patrons can experience this via the nearby footpaths and the close by South Downs Way and other tourist attractions in this part of the Park.
- b. Design and location of development minimises need to travel by private car and encourages access and/or subsequent travel by sustainable means, including public transport, walking, cycling or horse riding;
- 7.8 **Officer response:** The Woodcote is located outside of the settlement boundary. Given the site's location and nature of the scheme, it is accepted that there would be a reliance on the use of private vehicles. Pulborough Station is approximately 9 Miles away, Amberly 10 miles away, Petersfield 15 miles away and Chichester 14 Miles away. The applicant has confirmed that they will offer a minibus/taxi pick up services from various train stations as well as

- Midhurst, (which is well served by buses) to serve the tourist units and will advertise rail and bus travel as a more sustainable form of travel as part of their visitor information pack.
- 7.9 It should also be noted that the existing pub already benefits from six tourism units, in this instance the location of the facility is established already and by conditioning a visitor pack, which will also commit to notifying those who book the restaurant of the pick-up service, sustainable travel can be further encouraged. It is considered that, on balance, the applicant has minimised the need to travel by private car as much as feasibly possible in this instance and Criterion (b) is met.
- c. Development proposals will not detract from the experience of visitors or adversely affect the character, historical significance, appearance or amenity of the area.
- 7.10 **Officer response:** During the course of the application the scheme has been scaled down from that originally submitted, the car park has been considerably reduced and relandscaped to be less 'fussy' and more in keeping with the rural surroundings. The outlying buildings proposed within the field immediately to the west of the site removed, the proposed extension to the pub has been revised. Taking into account these changes it is now considered that this criterion is met as detailed below under the landscape section of the assessment
- d. Development proposals make use of existing buildings, and, if no suitable existing buildings are available, the design of any new buildings are sensitive to the character and setting;
- 7.11 **Officer response:** The proposals make use of the existing pub but do propose the demolition of the existing bed and breakfast accommodation to the rear of the building. The applicant has stated that these units suffer from water egress and damp and that they are not suitable for purpose in this particular case. The proposed new lodge buildings and extension to the existing pub utilise the existing hard standing where possible and the design and access statement sets out the project team will seek to re-use as much of the existing lodge buildings as they can in the construction of the new elements of the scheme. Further details regarding this intention are secured by condition 7 (CEMP)
- 7.12 As set out under the Landscape and Design section below, the proposed new buildings are considered to be suitable to the character and setting and the applicant has set out why the existing buildings are not suitable. Therefore, this criterion is met.
- e. Ancillary facilities are not disproportionately large in relation to the rest of the visitor facilities.
- 7.13 **Officer response:** Whilst it is accepted that the new extension to the pub is, on plan form, relatively large, it is not considered this is how an individual would experience the presence of these buildings on site or passing the site.
- 7.14 The location of the new buildings allows for a natural cluster of development behind the existing pub, which retains its prominence in the landscape. As such, the new buildings which house the restaurant, private dining room and other facilities are read, in landscape terms and from the public environs, as a collection of buildings which support the existing pub rather than dominating it. This criterion is considered to be met
- f. Any proposal does not have an adverse impact on the vitality and viability of town or village centres or assets of community value];
- 7.15 **Officer response;** The application proposes to expand the existing pub, to offer a restaurant, private dining room and an additional 10 lodge rooms. The application is supported by the SNDPA sustainable economy officer who advised that holiday accommodation is underrepresented within the visitor economy at 5% and that more should be done to encourage overnight stays, which inject, on average, 73% more into the local economy. Given this unmet demand it is unlikely that the additional 10 units of overnight accommodation will adversely impact the viability of other bed and breakfast, hotels, air b n b or other types of overnight accommodation in the local vicinity.

- 7.16 The sustainable economy officer also notes “the Woodcote’s ambition for a Green Michelin star, which demonstrates an approach to using sustainable locally sourced food, including wild venison. This is welcome to support healthy, balanced woodlands – as evidenced by deer impacts through Natural England’s Sussex Woods Project and in line with PMP Outcome 8”.
- 7.17 It is considered that the proposed uses on the site are aimed at a different market to the local pubs within the local area and, on balance, it is considered unlikely that the proposals would have adverse impact upon other local hospitality establishments or the village centre of nearby Graffham. This criterion is met.
- g. Where proposals are located outside settlement policy boundaries as defined on the Policies Map, they:
    - i. Positively contribute to the natural beauty, wildlife and cultural heritage of the National Park; and
    - ii. Are closely associated with other attractions/established tourism uses, including the public rights of way network; or
    - iii. Are part of farm diversification schemes or endorsed Whole Estate Plans.
- 7.18 **Officer response:** The application is considered to comply with SD23(g). The pub is an established destination for hospitality with overnight accommodation and is located in the open countryside in a rural setting and immediately adjacent to the public right of way network. The amount of and the location of the proposed development at the site has been reduced from that originally proposed and is now clustered to the rear of the existing building.
- 7.19 The overall character of the pub, which appears as relatively 'quiet' and isolated facility will be altered, but in a sensitive manner and not to such an extent that would justify a reason for refusal on these grounds, especially when the proposed planting, additional BNG, greater planning controls (hours of use, number of covers, sustainable travel), ‘undergrounding’ of the electricity pylons and improved lighting scheme are taken into account.

Landscape and Design

- 7.20 The National Park is afforded the highest level of Landscape protection under the National Park Purposes and duty, and relevant legislation. Policies SD 4 and SD 5 only permit development where it will conserve and enhance landscape character and where sensitive and high-quality design makes a positive contribution to the overall character and appearance of the area.
- 7.21 The SDNPA Landscape officer still maintains an objection to the scheme on the grounds that it is not landscape led and therefore is not in accordance with policy. The officer considers the farmstead analogy inappropriate in this instance due to the fact there is no historic evidence that this site was ever a significant farmstead, but in all likelihood a small holding only. The officer also maintains concerns that the site is very wet, heavy clay and inappropriate for development and that the development proposed does not respect the historic pub as an isolated and characterising feature in the landscape.
- 7.22 The officer does consider the reduction the size of the car park and the re-design to a more simplistic form of parking in the revised drawings to be positive. They also support the land management and grazing aspiration of the applicant as well as the removal of the formerly proposed walled kitchen garden, other buildings and tracks.
- 7.23 Policy SD4 (1) notes that development proposals will only be permitted where they conserve and enhance landscape character by demonstrating that:
- a. They are informed by landscape character, reflecting the context and type of landscape in which the development is located;
- 7.24 **Officer response:** The applicant has provided an understanding of the landscape character within the submitted Design and Access Statement. Officers largely agree with this assessment, albeit that the landscape officer considers that more value should be placed

upon the existing pub building, its history and the contribution it makes to the character of this part of the Landscape. The proposed design does seek to respect and integrate with the rural agricultural character of this part of the Park.

- b. The design, layout and scale of proposals conserve and enhance existing landscape and seascape character features which contribute to the distinctive character, pattern and evolution of the landscape;
- 7.25 **Officer Response:** Whilst the proposed extension to the pub is large in terms of the floor area it covers, its proposed scale and form as well as detailed materials result in it appearing, when 'on the ground' as a cluster of smaller buildings, grouped behind the dominant pub at the front. The restaurant is designed as a traditional barn and this design, as well as the choice of materials and the fact that its ridgeline will be below that of the pub, means that this building is read as a supportive structure, subservient to the pub rather than dominating it.
- c. They will safeguard the experiential and amenity qualities of the landscape; and
- 7.26 **Officer response;** Footpath 959 runs along the eastern side of the site. People walking along this footpath, and along Woodcote Lane itself will be able to view parts of the proposed extension and the lodges behind it. However, these glimpses are mainly in isolation. The only 'complete' view of the whole scale of the extension and lodges combined is from Woodcote Lane approximately 80 metres away. This view is screened by the new proposed hedging and the planting and again, due to the detailed design and scale of the proposals, one is given the impression of a collection of buildings to the rear of the pub.
- 7.27 The existing visual experience will change as a result of the proposals, however this change is not considered to detrimentally impact the tranquillity or visual amenity of the area to such an extent that refusal would be justified in this instance. offered by the scheme.
- d. Where planting is considered appropriate, it is consistent with local character, enhances biodiversity, contributes to the delivery of GI and uses native species, unless there are appropriate and justified reasons to select non-native species.
- 7.28 **Officer response:** the proposed planting seeks to emulate the former hedgerows and the past wooded character of this part of the landscape. The proposed draft landscape plan envisages the use of native species, and it is recommended that condition 6 is attached to secure these credentials.
- 7.29 In addition to the above it is considered that, due to the clustering of development to the rear of the site and its small scale nature, the integrity of the predominately open and undeveloped appearance of the land between settlements is retained, in accordance with SD4(2). The application will also improve green corridors, proposing the planting of additional native hedgerows to connect with those already present, and it will safeguard the stream to the south of the site, all in accordance with SD4 (4).
- 7.30 In conclusion on landscape impact, whilst the provision of the additional built form on this site would result in a further intervention in this rural landscape, the location of these structures mitigates against the impact of this intervention. It is considered the scenic quality of this part of the Park is conserved.
- 7.31 There are no objections from the design officer to the scheme. Paragraph 5.21 of the Local Plan states that the purpose of Policy SD5 is to ensure that '*all development is of the highest possible design quality which reflects and respect the exceptional; quality of the natural agricultural and building environment of the Park*'. Following receipt of revised drawings, the application is now considered to represent a more appropriate scale of development, with all the new structures being located to the rear of the existing public house. The architectural design is sympathetic in terms of height, roof form and materials. The only controversial element of the extension is size (in terms of floor area) of the ground floor extension to the pub.
- 7.32 However, as already noted, the floor area of the proposed extension is not considered so obtrusive from any experiential vantage point. It is only when it is viewed on a plan that its size, in comparison to the host property, becomes apparent. The roof form and materials of

this structure, as well as the very limited public vantage points, mean that it will appear as a cluster of small barns behind the pub, rather than one large structure.

- 7.33 The lodge buildings are located further south than the existing bed and breakfast lodges on the edge of the redline application site but well within the blue line plan. Whilst 16 new rooms are proposed, these are housed in 4 new structures. Constructed of a mix of flint and blackened timber with slate tile roofs, these structures are designed to appear as a cluster of agricultural outbuildings. This design rationale is considered appropriate and sensitive in this rural landscape.
- 7.34 The scheme is considered to accord with the purpose of SD5. The amount of development proposed on the site has decreased significantly since the original pre application submission and has again been revised during the course of this application. The revised layout and materials now before committee are considered to be a significant improvement upon the original iteration of the scheme.

Peace and Tranquillity

- 7.35 Policy SD7 relates to Relative Tranquillity, noting that development proposals will only be permitted where they conserve and enhance relative tranquillity and consider the following impacts;
- a. Direct impacts that the proposals are likely to cause by changes in the visual and aural environment in the immediate vicinity of the proposals
- 7.36 **Officer response;** As noted above within the landscape section, the proposed plan form of the development proposals is 'inward looking', with glazing kept to a minimum around the outwardly facing walls, the only exception to this being the lodge rooms to the rear – which do have garden rooms facing out towards the countryside. However, the windows here are screened by timber louvres and the buildings themselves by additional hedge planting and they are unlikely to be highly visible to passers-by.
- 7.37 This overall design rationale helps to mitigate the visual impact of the proposed extended restaurant, dining room etc as well as the lodges and officers consider that it will also assist in keeping reducing the aural impact, especially taking into account that the majority of seating is indoors, and there is only a small area dedicated to external outside seating. Whilst regular walkers along the adjacent footpath may notice a slight increase in activity on site when walking past it is considered that this will fluctuate and will not be constant. Additionally, it will be temporary and only appreciable when close to the site along footpath GA959 and that it would not, in any event, be to such a degree of intensity as to justify a refusal on these grounds.
- b. Indirect impacts that may be caused within the National Park that are remote from the location of the proposals themselves such as vehicular movements;
- 7.38 **Officer response;** The development proposals are considered small scale, in both terms of their visual impact and their operational impact and will not have any adverse indirect impacts within the National Park that are remote from the location of the proposals.
- 7.39 The only potentially material impact arising from the proposed development relates to increased traffic movement. However, the highways authority has confirmed that the local rural network is capable of accommodating the anticipated rise in vehicular movements without compromising safety. Officers have carefully considered the projected traffic levels and, in light of the relatively low number of additional vehicles expected on the road, together with the absence of any objection from the highway's authority, it is concluded that there are no sustainable grounds on which to refuse the application due to traffic
- c. Experience of users of the PRow network and other publicly accessible locations
- 7.40 **Officer response;** Footpath 959 runs directly to the east of the site, entering to the south over a narrow plank bridge over the brook. It then runs up the eastern side of the site to a gate in the top of this field which joins Woodcote Lane. The formal route of this footpath should dog leg back into the site, through the existing large hedgerow. Over the years this

hedgerow has overgrown and the footpath in reality continues along its eastern site to a gate in the top of the field before joining Woodcote Lane.

- 7.41 The applicant has committed to restoring the formal public right of way and this is shown on updated drawing 222.51.11000.SITE rev 02. They also propose an alternative permissive footpath which will just be a mown path through the existing field, much as it is now. This route will be secured via a permissive path agreement through 24.
- 7.42 GA959 is the only footpath only one that runs directly adjacent to the site. The definitive route for this footpath already runs past the existing pub building. Therefore walkers along this route will experience the extended part of the pub from this particular section of the footpath. Additionally, users will see glimpses of the proposed new lodges at the southern end of the site as well as glimpses of the pitched roofs rising above the proposed extension. However, these views will be fleeting, through the proposed new native hedge and only experienced for a short time. Also, due to the traditional nature of the design and the materials chosen, these structures will not look alien in this location, but will blend, in time, with the proposed additional hedgerow and tree planting.
- 7.43 The only other public views of the site are from Woodcote lane itself, where they are somewhat obscured by the existing hedge line, and there are glimpses of the site from Footpath GA958 which runs westwards and is elevated above the site to some degree, however these views are obscured by the existing mature hedge lines and trees and will be even more masked by the proposed new hedges. At all public vantage points, as one moves through the landscape along the footpaths, it is anticipated that the buildings will only ever be viewed as a collection of smaller buildings rather than as one large building, which is the reality on plan form.
- 7.44 It is not considered that the experience of user of this particular part of the Public Rights of Way (PRoW) network, or any other publicly accessible locations, would be so adversely impacted so as to justify refusal of this application

Dark Night Skies

- 7.45 The site lies within the Dark Night Skies Rural Dark Core. Currently there is no control of lighting across the site. A lighting assessment has been submitted with the application and, whilst there are parts of this that require updating (proposed lux levels to be below 500lux to preserve nocturnal foraging and the removal of Gobo projectors from the scheme) overall the assessment demonstrates that the scheme can be an improvement on the existing situation in terms of Dark Night Skies. Condition 13 secures an updated lighting assessment prior to the commencement of works to ensure that the scheme is fully compliant with the Dark Night Skies Technical Advice Note.

Biodiversity Net Gain, Ecosystem Services and Trees

- 7.46 Policy SD2 requires applicants to consider ecosystems services and SD9 S (b) of the South Downs Local Plan notes that development proposals should identify and incorporate opportunities for net gain in biodiversity.
- 7.47 BNG is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990. A BNG metric has been provided demonstrating that the development would achieve well above the mandatory standards demonstrating a 58.24% gain in area habitat units, 105% gain in hedgerow units and 49% gain in watercourse units. It should be noted that the watercourse units are based upon the permanent pond and swales and do not include the proposed SUD's basin in the western field. Therefore, the imposition of condition 11 and the request for a revised SUD's scheme will not adversely impact biodiversity net gain in watercourse units achieved on the site.
- 7.48 With regards to Trees and hedgerows the arboriculture assessment notes that 52 individual trees, 21 groups, 17 hedges and 1 woodland were surveyed. Whilst the BNG metric refers to these all being retained in fact the proposals require the removal of 7 individual trees, 8 hedges and 2 groups to be removed. All are category 'C' and the trees are small trees, between 1.5m to 10m in height. In the context of this site and in light of the large amount of

replanting proposed, the loss of this small percentage of category C trees is considered acceptable.

Water Neutrality

- 7.49 When the application was submitted Water Neutrality was still in operation across the Sussex North Water Supply Zone. However, since then Natural England have issued a withdrawal statement (31 October 2025) confirming that its Water Neutrality Position Statement of September 2021 has been withdrawn. This follows the agreement between Southern Water and the Environment Agency that a licence cap on water abstraction will ensure with sufficient certainty that development will not adversely impact the protected Arun Valley habitats.
- 7.50 This means that development within the Sussex North Water Supply Zone is no longer required to demonstrate that it is water neutral.

Parking, Cycling and Highways

- 7.51 The existing pub is an isolated building in the countryside; it has a restaurant with approximately 30 covers and 6 bed and breakfast rooms. The existing car park has approximately 40 spaces. The site lies adjacent to a public footpath (959) and within close proximity to Centurion Way, The Serpent Train and the South Downs Way. Whilst it is possible to access the site by foot or cycle it is accepted that most people already travel by car and this is likely to continue.
- 7.52 The Transport Statement states that the proposed scheme includes a new pub/restaurant which will have 80 covers and 16 bedrooms which will generate 16 covers in the private dining room.
- 7.53 The Design and Access Statement States the following with regards to the number of proposed covers; “The application proposes 80 dining covers in total (40 bistro / 40 restaurant), which can be controlled by planning condition. Additional seating shown externally and within ancillary spaces is illustrative only and demonstrates how the spaces may operate flexibly across seasons. These areas are not intended to increase overall cover numbers but to allow covers to be redistributed (for example, internal to external seating in favourable weather).”
- 7.54 The applicant has submitted an updated transport statement and the highways authority have been re-consulted on this. The revised proposals show a total of car parking 65 spaces, therefore an increase of 25 from the existing situation. At the time of writing no response had been received from WSCC Highways and members will be updated at committee should there be any comments arising. It should be noted that the Highways Authority has not raised an objection to date.
- 7.55 There have been comments raised by third parties which criticise the applicants original transport statement and their generation forecasts using the TRICs database. However, WSCC, as the Highway Authority has addressed this matter and it should be noted that the authority still considered that, whilst vehicle movements to and from the site will be increased, this will not be to a level that could be deemed significant.
- 7.56 In terms of cycle spaces, minimum of two will be provided to serve the lodges and a minimum of eight to serve the restaurant. Cycle parking will be contained in an out-building and condition 6 (f) secures this. Given the amount of space available on site it is considered appropriate that these details are conditioned in this instance.
- 7.57 In terms of car parking spaces the SDNPA parking guidance notes that eight spaces would be required for the lodge accommodation and 68 would be required in respect of the expanded pub and restaurant.
- 7.58 The proposed number of spaces is 65 in total and therefore less than the guidance suggests. However, it should be noted that the SDP advises at the outset that the overarching principles are that development should be landscape led and sustainably located. The pub is already in existence, as is its car park. During the course of the application officers have

requested that the overall car parking area be reduced in order to reduce its impact on the landscape that surrounds it, especially with regard to views from Woodcote Lane.

- 7.59 The applicant has undertaken an accumulation exercise with regards to calculating trip generation and predicting parking levels. The submitted TS has assessed the 16 holiday lodges, a restaurant/pub operating with 80 covers and a restaurant/pub operating with 128 covers in terms of trip generation and concludes that these numbers can be accommodated by the surrounding rural road network. The same exercise has been undertaken with regards to parking provision, for both 80 covers and 128 covers within the restaurant/pub. This concludes that the highest parking requirement would be 52 spaces between 7pm and 8pm on the basis of 128 covers.
- 7.60 Taking the above into account, and condition 17, which limits the numbers of covers in the restaurant to 80, the level of on-site parking provided is considered to be appropriate.
- 7.61 As noted in the proposals section EV charging points are provided at a ratio of 1 every 5 spaces, this is in excess of the SDNPA standard of 1 every 10 and is welcomed.

Sustainability

- 7.62 The submitted design and access statement sets out the sustainability aspirations of the proposed application. It commits to the use of local materials, the re-use of materials from the demolished buildings, the use of air source heat pumps and rainwater recycling to serve all WC cisterns and external taps. The proposal is targeting a BREEAM NC excellent rating which complies the SDNPA sustainability criteria and which will be secured by conditions 8 and 9.

Residential Amenity

- 7.63 The overwhelming majority of third-party comments relate to the potential increase in traffic, potential noise and disturbance caused by guest comings and goings and the resulting impact that the proposed new/extended use could have on the peace and tranquillity in this part of the Park. It is accepted that the proposed development will increase comings and goings to and from the site. However, environmental health have no objection from the scheme providing that limiting hours conditions are attached (see condition 16).
- 7.64 It should also be noted that, at present, there are no planning related hours controls, number controls or lighting controls in respect of this site. Condition 16, limits the hours of use. Condition 16 limits the maximum number of covers to and condition 13 requires a DNS compliant lighting scheme.
- 7.65 Taking these measures into account and noting that the pub is an existing and established business in the open countryside, it is not considered that a reason for refusal could be sustained on the ground of impact upon residential amenity.
- 7.66 There are also some comments regarding privacy however the application site is a large one, surrounded on all sides by fields and it is not considered that a reason for refusal could be sustained on these grounds.

Flood risk, Drainage and Sustainable Drainage Systems (SuDS)

- 7.67 Policy SD17 refers to the protection of the water environment, SD50 states that development proposals will be permitted where they ensure that there is no net increase in surface water run-off, taking account of climate change. SD50(2) notes that proposals for major development (Major development as defined in the Town and Country Planning (Development Procedure) (England) Order 2015) will be permitted where they provide suitable sustainable drainage systems, unless it is demonstrated to be inappropriate.
- 7.68 The site is in Floodzone 1 and has less than a 1 in 1000 annual probability of flooding from rivers or the sea. An ordinary unnamed watercourse is located approximately 35m south of the southern site boundary. As noted within the submitted Flood risk and Drainage Assessment the site is located within a drinking water safeguard zone and drinking water protected area, both for surface water. It is outside of any source protection zone. The site is within an area of negligible risk from ground water flooding.

- 7.69 The drainage strategy proposes that surface water be conveyed and stored in a number of ways, using a pond (permanent water body with limited storage capacity) swales, and basins. Water will be conveyed between these bodies using pipes and natural gravity, where possible, although some pumping will be required. Flows from all parts of the site would pass through swale 1, swale 2 and basin one as a minimum and the scheme follows the SUD's train to ensure water quality.
- 7.70 The proposed SUD's strategy is an unusual one and involves the creation of large 'depressions' (basins) in the field immediately to the east and adjacent to the site. Water is pumped to these basins and exits into them via a series of headwalls. These basins will hold excess surface water before it drains to the ordinary watercourse to the south of the site.
- 7.71 The landscape officer has raised concerns with the SUD's strategy, principally because it partially goes against the topography of the site and therefore does not appear landscape led. Whilst officers agree with the aspirations of the applicant to manage water at surface and to mimic natural processes, they are not yet convinced that the strategy represents the most ideal solution for the site. Therefore, notwithstanding the details submitted, Condition 11 requests an updated surface water drainage strategy prior to commencement.

### **Conclusion**

- 7.72 Overall, the scale and design of the revised proposals are acceptable having taken into account consultee responses, representations, and the landscape character and appearance of the immediate and surrounding area. The new development will be seen against a backdrop of rising land and existing built form and will, in part, utilise the space upon which development (the existing lodge buildings) already occupies.
- 7.73 There are no impacts upon surrounding amenities as a direct result of these proposals which would justify a refusal of Planning Permission.
- 7.74 The NPPF outlines overarching economic, social and environmental objectives to sustainable development. In these respects, the scheme would deliver an enhanced tourism facility on a site already used for tourism and hospitality. Environmentally the scheme would provide BNG and Ecosystems enhancements, an improved lighting scheme, landscape improvements through the undergrounding of the overhead powerlines and replanting of historic hedgerows and meet the sustainability credentials of the Local Plan.
- 7.75 The proposals substantially comply with the Local Plan and the NPPF, National Park Purposes and duty, and relevant legislation.
- 7.76 The application is, therefore, recommended for approval subject to the conditions as set out below.

## **8. Reason for Recommendation**

- 8.1 It is recommended that Planning Permission be granted subject to the conditions set out at paragraph 8.1 of the report, and any amendments or other conditions required to address technical matters.

## **9. Planning Conditions and Reasons**

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: To comply with the provisions of Section 91 (1) of the Town and Country Planning Act 1990 (as amended) and Section 51 of the Planning and Compulsory Purchase Act 2004.

2. The development hereby permitted shall be carried out in accordance with the plans listed below under the heading "Plans Referred to in Consideration of this Application".

Reason: For the avoidance of doubt and in the interests of proper planning.

### Holiday Accommodation

3. The tourist accommodation hereby permitted shall be used for holiday accommodation only and shall not be used for any other purpose (including any other purpose within

Class C3 of the Schedule to the Town and Country Planning (Use Classes) Order 1987, or any Order revoking and re-enacting that order with or without modification). No guest shall stay in excess of 28 consecutive nights in any one calendar year. The operator shall maintain a record of the names, permanent addresses and duration of stay of all adults staying in the lodges and make this record available for inspection by the Local Planning Authority within 30 days of any written request.

Reason: To accord with the terms of the planning permission by restricting use to short term guest accommodation only and maintain the availability of short-term tourist

4. Prior to the occupation of the lodges, the restaurant or the private dining room, a guest information pack, the contents of which shall include (but not be exclusively limited to), information on sustainable travel and local transport nodes, the offer of a minibus/car collection service to and from local transport nodes, information on access to footways, cycle paths from the site, information on local attractions, information on how to access to the wider South Downs National Park, shall be submitted to and approved in writing by the Local Planning Authority. Once approved this information shall be made available to customers at the time of booking the accommodation and shall be provided within each lodge at all times.

Reason: To encourage sustainable travel and access into the surrounding countryside and to local facilities on foot.

#### Materials

5. No development above slab level shall be commenced unless and until a schedule, (showing the location of) of all external materials, along with samples of such materials (including finishes and colours) has been submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be implemented in full accordance with the approved details.

Reason: To enable the Local Planning Authority to control the development in detail in the interests of the character and appearance of the area and the quality of the development.

#### Design and Landscaping

6. No development above slab level shall take place until a detailed Scheme of Soft and Hard Landscape Works has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include details of, but not be limited to:
  - a) Proposed planting plans and schedules of plants and trees, including written specifications, cultivation and other operations associated with plant, grass, shrub and replacement tree establishment, to be sourced from a peat-free nursery;
  - b) Construction of parking spaces;
  - c) Locations for the installation of bird and bat boxes, including swift bricks;
  - d) Location, height and materials/construction technique for all boundary treatments including gates, walls, fences (to include hedgehog highways) and hedges;
  - e) Treatment of surfaces, paths and access ways;
  - f) Design of ancillary structures including cycle and refuse storage, EV charge points to the parking areas, including for EV bikes;
  - g) A timetable for implementation of the soft and hard landscaping works;
  - h) A schedule of landscape maintenance for a minimum period of ten years to include details of the arrangements for its implementation; and
  - i) location and details of the proposed planting associated with all SUDs features as shown on drawing number xxx

All such works as may be approved shall then be fully implemented in full accordance with the approved development.

All soft landscaping shall be carried out in the first planting and seeding season following the first occupation of the development, or the completion of the development, whichever is the sooner. All shrub and tree planting shall be maintained free from weeds, avoiding pesticides, and shall be protected from damage by vermin and stock. Any trees or plants which, within a period of ten years, die, are removed, or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species.

Reason: To achieve an appropriate landscaping scheme to integrate the development into the landscape, in accordance with SD2, SD4 and SD5, and the SDNPA Design Guide SPD

7. No development shall commence, including any works of demolition, until a Construction Environmental Management Plan has been submitted to, and approved in writing by, the Local Planning Authority. The Plan shall take into account the guidance contained within the Ecological Impact Assessment by Imprint Ecology (Version 2) dated December 2025 and provide for (but not be limited to):
  - i. An indicative programme for carrying out of the works;
  - ii. Method Statement for demolition, excavation and construction work, including a method for the storage and re-use of the materials from the demolished 6 bed and breakfast units;
  - iii. The arrangements for public consultation and liaison during the construction works;
  - iv. Details of Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP);
  - v. Measures to minimise the noise (including vibration) generated by the construction process to include hours of work, proposed method for constructing foundations, the selection of plant and machinery and use of noise mitigation barrier(s);
  - vi. Details of any floodlighting, including location, height, type and direction of light sources and intensity of illumination; These details shall take into account the recommendations of the Shadow Habitats Regulations Assessment dated March 2025 by ECOSA;
  - vii. The parking of vehicles of site operatives and visitors;
  - viii. Construction traffic routes and their management and control;
  - ix. Parking and turning provision to be made on site;
  - x. Adequate provision for addressing any abnormal wear and tear to the highway;
  - xi. Loading and unloading of plant and materials;
  - xii. Storage of plant and materials used in constructing the development;
  - xiii. The erection and maintenance of security hoarding, where appropriate;
  - xiv. Wheel washing facilities;
  - xv. Measures to control the emission of dust and dirt during construction, including measures to prevent mud being deposited on the highway;
  - xvi. Protection of pedestrian routes during construction;
  - xvii. Provision for storage, collection and disposal of rubbish;
  - xviii. Any re-use of on-site material and spoil arising from site clearance and demolition work and diverting waste from landfill (e.g. recycling); and
  - xix. Working hours; including a limit to construction activities to daylight hours only.

The approved Plan shall be adhered to in full throughout the entire construction period.

Reason: In the interests of highway safety and the character and amenity of the area and in order to protect and enhance biodiversity in accordance with the Habitat and Species

Regulations 2017, Wildlife and Countryside Act 1981, NERC Act, NPPF and Policy SD8 and SD9 of the South Downs Local Plan.

Sustainable Construction

8. Prior to the commencement of the development hereby permitted detailed information in a design stage sustainable construction report in the form of:
- a) interim stage BREEAM NC certification and associated assessment report;
  - b) design stage SBEM calculations;
  - c) product specifications;
  - d) Grown in Britain or FSC certificates;
  - e) sustainable material strategy;
  - f) building design details;
  - g) layout or landscape plans demonstrating that the development has:
    - a. achieved BREEAM NC excellent standard
    - b. has reduced predicted CO<sub>2</sub> emissions by at least 20% due to on-site renewable energy compared with the maximum allowed by building regulations
    - c. provided at least one EV charger and cable routes for 1 in 5 spaces
    - d. achieved specific BREEAM NC credits:
      - i. Ene 04 (passive design analysis);
      - ii. Wst 01 diversion of resources from landfill credit;
      - iii. At least half of Material credits;
      - iv. 2no. SuDS Pol 03 credits;
      - v. Wst 05 credit;
    - e. has provided sustainable drainage;
    - f. enhanced green infrastructure and GI linkage and adaptation to climate change; and
    - g. has selected sustainable materials.

shall be submitted to and approved in writing by the Local Planning Authority. The development shall be built in accordance with these agreed details.

Reason: To ensure the development demonstrates a high level of sustainable performance to address mitigation of, and adaptation to, predicted climate change.

9. Prior to the occupation of the development hereby permitted detailed information in a post construction stage sustainable construction report in the form of:
- a) post construction stage BREEAM NC certification and associated assessment report;
  - b) post construction SBEM calculations;
  - c) product specifications;
  - d) Grown in Britain or FSC certificates;
  - e) sustainable material strategy;
  - f) building design details;
  - g) layout or landscape plans demonstrating that the development has:
    - a. achieved BREEAM NC excellent standard
    - b. has reduced predicted CO<sub>2</sub> emissions by at least 20% due to on site renewable energy compared with the maximum allowed by building regulations

- c. provided at least one EV charger and cable routes for 1 in 5 spaces
- d. achieved specific BREEAM NC credits:
  - i. Ene 04 (passive design analysis);
  - ii. Wst 01 diversion of resources from landfill credit;
  - iii. At least half of Material credits;
  - iv. 2no. SuDS Pol 03 credits;
  - v. Wst 05 credit;
- e. has provided sustainable drainage;
- f. enhanced green infrastructure and GI linkage and adaptation to climate change;  
and
- g. has selected sustainable materials.

shall be submitted to and approved in writing by the Local Planning Authority. The development shall be occupied in accordance with these agreed details and these details will hereafter be retained.

Reason: To ensure the development demonstrates a high level of sustainable performance to address mitigation of, and adaptation to, predicted climate change.

The development hereby permitted shall not be brought into use until details of refuse and recycling storage shall have been submitted to and approved in writing by the Local Planning Authority. The approved refuse and recycling storage facilities shall be implemented in full accordance with the approved details prior to the occupation of the development and thereafter be retained. Reason: To conserve the visual amenities of the locality.

#### Drainage & SuDS

10. No development shall commence until details of the proposed means of foul sewerage have been submitted to and approved in writing by the Local Planning Authority i. Hereafter, the development shall be carried out in full accordance with the approved details. The development shall not be occupied until the drainage system has been implemented in full accordance with the approved details.

Reason: To ensure satisfactory provision of foul water drainage. It is considered necessary for this to be a pre-commencement condition as these details need to be agreed prior to the construction of the development and thus go to the heart of the planning permission

11. Notwithstanding the details already submitted no development shall commence until an updated Floodrisk and Drainage Assessment, including details of the proposed means of surface water run off disposal in accordance with Part H3 of Building Regulations hierarchy as well as acceptable discharge points, rates and volumes, has been submitted to the Authority and approved in writing.

Reason: To ensure satisfactory provision of surface water drainage. It is considered necessary for this to be a pre-commencement condition as these details need to be agreed prior to the construction of the development and thus go to the heart of the planning permission.

12. No development shall commence until details of the landscaping proposals in proximity of the public apparatus have been submitted to and approved by the Local Planning Authority in consultation with Southern Water.

Reason: In order to protect the public sewer network in accordance with Southern Waters guidance.

#### Dark Night Skies

13. No development shall commence above slab level until a external lighting scheme has been submitted to and approved in writing by the Local Planning Authority. All external lighting shall be restricted to down lighters that do not exceed 1000 lumens, which shall be designed and shielded to minimise upwards light spillage. It shall also take into account bat foraging and commuting routes and be informed by measures outlined in the submitted ecological impact assessment by Imprint Ecology dated December 2025 Measures shall thereafter be implemented in full accordance with the approved details.

Reason: To conserve dark night skies and due to the sensitive ecological nature of the site.

Parking and Highways

14. Prior to the development being brought into use, the car parking spaces as shown on drawing 222.51.11000.SITE and cycle parking spaces as approved under condtion 10 shall have been completed in full accordance with the approved plans and shall be retained thereafter.

Reason: To ensure adequate on-site parking is provided

Limitations

15. The development hereby permitted shall be used for a pub and/or bistro use with restaurant and private dining room and for 16 guest bedrooms with associated library and bar facilities and not for any other purpose (including any purpose in Class E of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended), or in any provision equivalent to that class in any Statutory Instrument revoking and re-enacting that Order with or without modification.

Reason: To enable the Local Planning Authority to regulate and control the development of land in the interests of the character and appearance of the area and amenity.

16. With the exception of the 16 units of holiday accommodation, the associated lodge bar and library, customers shall not be permitted within the pub/bistro, restaurant or private dining areas (including outside seating areas) before 9am or after 11.30pm on Monday to Saturday (not including bank holidays and public holidays) and before 9am or after 10pm on Sundays, bank holidays and public holidays.

Reason: To enable the Local Planning Authority to regulate and control the development of land in the interests of the character and appearance of the area and amenity of neighbours.

17. No more than 80 customers shall be allowed into the pub/bistro, restaurant or private dining areas (including the outside seating area) at any one time. For the avoidance of doubt this is a total of 80 any one time across the whole of the area identified on plan 222.51.20201.GA. This limitation is in accordance with the submitted Transport Statement by GTA ref 12781 and dated November 2025 and also with the Design and Access statement by Mclean Quinlan dated December 2025.

Reason: In order to preserve the peace and tranquillity of this part of the National Park and in order to monitor and regulate the impact of vehicular traffic on the rural road network.

18. No development shall commence above slab level until details of any externally located part of the ventilation system to get rid of cooking smells including sections and elevations are submitted to and approved by the Authority. These details shall include a noise impact assessment which demonstrates the proposed equipment complies with BS4142:2014+A1:209 and also a scheme to show that adequate Oduor control requirements are in place. The development shall not be occupied until the system has been implemented in full accordance with the approved details.

Reason: In order to preserve the peace, tranquillity and visual amenity of this part of the National Park.

Ecology, BNG, Trees

19. Development shall proceed in accordance with the measures set out in the Ecological Impact Assessment dated December 2025 by Impact Ecology;
- Reason: To protect and enhance biodiversity in accordance with the Habitat and Species Regulations 2017, Wildlife and Countryside Act 1981, NERC Act, NPPF and Policy SD8 and SD9 of the South Downs Local Plan.
20. The Biodiversity Gain Plan shall be prepared in accordance with the Biodiversity Net Gain Report dated January 2026 by Imprint Ecology
- Reason: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act, Policy SD9 of the South Downs Local Plan (2014-33) and the SDNPA Biodiversity Technical Advice Note.
21. Prior to the commencement of the development hereby permitted, a Habitat Management and Monitoring Plan (HMMP) shall be submitted to and approved in writing by the Local Planning Authority. The HMMP shall accord with the Biodiversity Gain Plan and include, but not be limited to:
- i) A non-technical summary;
  - ii) The roles and responsibilities of the people or organisations delivering the HMMP;
  - iii) The planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;
  - iv) The management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the first use of the development;
  - v) The monitoring methodology and frequency in respect of the created or enhanced habitat; and
  - vi) Provision for the identification, agreement and implementation of contingencies and/or remedial actions where the results from monitoring show that the conservation aims and objectives of the HMMP are not being met.

The created and/or enhanced habitat specified in the approved HMMP shall thereafter be managed, maintained and monitored in accordance with the approved HMMP.

Reason: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act, Policy SD9 of the South Downs Local Plan (2014-33) and the SDNPA Biodiversity Technical Advice Note.

22. Prior to the first use of the development hereby permitted, a completion report, evidencing the completed habitat enhancements set out in the approved Habitat Management and Monitoring Plan, shall be submitted to and approved in writing by the Local Planning Authority.
- Reason: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act, Policy SD9 of the South Downs Local Plan (2014-33) and the SDNPA Biodiversity Technical Advice Note

Miscellaneous

23. Prior to the commencement of development above ground level a scheme for the 'undergrounding' of the overhead power lines shall be submitted to an approved in writing by the Authority. This agreed scheme shall then be implemented and all landscaping works completed prior to the occupation of the development
- Reason: To ensure that there is an acceptable methodology for the removal of the powerlines and to protect the visual amenity of the area.
24. Prior to the occupation of the development the applicant shall enter into a permissive path agreement with the Local Authority to secure the mown pathway as shown on drawing number 222.51.1 | 000.SITE for a minimum period of 20 years.

Reason: In order to secure the benefit of the permissive path as put forward in the proposals.

Informative:

1. The applicant is reminded that, under the Wildlife and Countryside Act 1981, as amended (section 1), it is an offence to remove, damage or destroy the nest of any wild bird while that nest is in use or being built. Planning consent for a development does not provide a defence against prosecution under this Act. Trees and scrub are likely to contain nesting birds between 01 March and 31 August inclusive. Trees and scrub are present on the application site and are to be assumed to contain nesting birds between the above dates, unless a recent survey has been undertaken by a competent ecologist to assess the nesting bird activity on site during this period and has shown it is absolutely certain that nesting birds are not present.
2. The applicant is reminded that at no stage during the works should the public right of way be disturbed, restricted or obstructed at any time and while the development is underway, safe & convenient public access must be available at all times across the full width of the path. The route must not be obstructed by vehicles, plant, scaffolding or the temporary storage of materials and/or chemicals during any works and should be protected throughout the course of development by clear demarcation including signs, fencing or surfacing as necessary.

If during construction closure of the public right of way is considered necessary for public safety, this can be applied for, at a cost, from the County Public Rights of Way team. If the route surface is considered damaged as a result of the development then the applicant will be liable and will be required to make good the surface to a standard satisfactory to the County Public Rights of Way team.

## **TIM SLANEY**

### **Director of Planning**

#### **South Downs National Park Authority**

Contact Officer: Sarah Round

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Appendix: I - Information concerning consideration of applications before committee.

SDNPA Consultees Legal Services; Development Manager.

Background Documents: [SDNP/25/01323/FUL | Extension and remodelling of the existing pub and guest rooms to provide a bistro, restaurant, and 16 guest bedrooms in detached lodges, with associated works including relocated parking within a woodland copse, EV charging facilities, a photovoltaic array, orchards, food-growing areas, sustainable land and water management measures, native tree and hedgerow planting | The Woodcote Woodcote Lane Graffham West Sussex GU28 0NT](#)

[National Planning Policy Framework \(2023\)](#)

[South Downs Local Plan \(2014-33\)](#)

[The South Downs emerging Local Plan - South Downs National Park Authority](#)

[South Downs National Park Partnership Management Plan](#)

[Adopted Parking SPD - South Downs National Park Authority](#)

[Adopted Design Guide SPD - South Downs National Park Authority](#)

[Adopted Sustainable Construction SPD - South Downs National Park Authority](#)

[Biodiversity Net Gain Technical Advice Note \(TAN\) - South Downs National Park Authority](#)

[Ecosystem Services Technical Advice Note \(TAN\) - South Downs National Park Authority](#)

