

SOUTH DOWNS NATIONAL PARK AUTHORITY

PLANNING COMMITTEE

Held at: 10.00am on 12 March 2026 at The Memorial Hall, South Downs Centre.

Present: Heather Baker (Chairman), Alun Alesbury, Paul Bevan, Antonia Cox, Janet Duncton, Joan Grech, John Hyland, Gary Marsh, Stephen McAuliffe, Andrew Shaxson and Daniel Stewart-Roberts.

Officers: Robert Ainslie (Head of Development Management), Richard Ferguson (Development Management Lead (West)), Richard Fryer (Senior Governance Officer), Robert Green (Head of Major Development and Planning Operations), Rebecca Moutrey (Senior Solicitor), Jane Roberts (Governance Officer), Lucie Tushington (Conservation Officer), Claire Tester (Head of Strategic Planning), Kevin Wright (Planning Policy Officer) and Nicola Van Wunnik (Senior Development Management Officer).

OPENING REMARKS

The Chair welcomed Members to the meeting and informed those present that South Downs National Park Authority (SDNPA) Members had a primary responsibility for ensuring that the Authority furthered the National Park Purposes and Duty. That Members regarded themselves first and foremost as Members of the Authority and would act in the best interests of the National Park as a whole, rather than as representatives of their appointing body or any interest groups.

ITEM 1: APOLOGIES FOR ABSENCE

199. Apologies for absence were received from Robert Mocatta and Tom Nevill.

ITEM 2: DECLARATION OF INTERESTS

200. The following declarations was made:

- Stephen McAuliffe declared a public service interest in Agenda Item 6 as an Arun District Councillor.

ITEM 3: MINUTES OF PREVIOUS MEETING HELD ON 12 FEBRUARY 2026

201. The minutes of the previous meeting held on 12 February 2026 were agreed as a correct record and signed by the Chair subject to the amendments in the Update Sheet.

ITEM 4: UPDATES ON PREVIOUS COMMITTEE DECISIONS

202. The following updates were provided by the Head of Development Management:

- **SDNP/23/04238/FUL** - Black Robin Farm, Beachy Head Road, Eastbourne, was heard at Planning Committee in February 2024 and a decision had been issued.
- **SDNP/23/03986/FUL** - Kings Ride Farm, Kings Ride, Alfriston, was heard at Planning Committee in February 2024 and a decision had been issued.
- **SDNP/25/02137/FUL** - Hatch Farm, W heatsheaf Enclosure, Milland was heard at Planning Committee in September 2025 and a decision had been issued.
- **SDNP/25/01421/FUL** - Various garage sites, Petworth was heard at Planning Committee in October 2025 and a decision had been issued.
- **SDNP/25/02622/FUL** - Hatch Farm, W heatsheaf Enclosure, Milland was heard at Planning Committee in February 2026 and a decision had been issued.
- **SDNP/25/04147/REM** - Land West and North of Windward Reservoir Lane Petersfield Hampshire was heard at Planning Committee in February 2026 and a decision had been issued.

ITEM 5: URGENT ITEMS

203. There were none.

ITEM 6: SDNP/25/04375/FUL - ROOTS ALLOTMENTS, LONG FURLONG

204. The Officer presented the application and reminded Members of the report (Report PC25/26-41).

205. The following speaker addressed the committee speaking against the application:

- Tina Peck, representing Clapham & Patching residents.

206. The Committee considered the report by the Director of Placemaking (Report PC25/26-41) and the public speaker comments and commented as follows:

- Requested clarification as to whether allotments fell within the statutory definition of agriculture for the purposes of Section 336 of the Town and Country Planning Act 1990.
- The visual impact of the shipping containers and the closed-circuit television (CCTV) pole was identified as a central issue, given the openness of the landscape and the prominence of the site as observed during the Committee's site visit.
- Attention was drawn to the level of clutter associated with the allotments, including sheds and other paraphernalia. They questioned whether these features could properly be characterised as agricultural. It was suggested that their cumulative effect contributed to an untidy and sprawling appearance across a large and visually sensitive part of the National Park.
- The need to distinguish between the specific application for three containers and a CCTV pole and the broader operational issues on the site were noted.
- Clarity was sought on how ongoing enforcement investigations relating to wider site activity should be considered alongside the current planning assessment, how long enforcement activity had been ongoing and what steps were currently being pursued.
- The extent of local concern was considered, noting ecological and wildlife concerns. It was acknowledged that whilst the ecological impact of the containers themselves might be limited, the visual impact was considered more substantial. It was suggested that additional native hedging could contribute positively.
- Some Members were of the opinion that the shipping containers were less visually intrusive than described, noting that when viewed against the hedge line, even at a time of limited foliage, they appeared to blend into the surroundings with minimal landscape impact. It was argued that screening and planting could further soften their presence and that the application could be supported subject to appropriate landscaping conditions
- Contrasting views were expressed that the containers materially reduced the openness of the landscape, with concern that their industrial form created an unavoidable visual presence from multiple directions, including from the public right of way. Members suggested that screening or cladding would not mitigate the harm and might instead intensify the sense of built form within an otherwise open rural setting.
- It was noted that metal shipping containers were more commonly found in urban, industrial, or construction environments and were therefore inappropriate within an open agricultural field in a designated National Park landscape. Particular concern was expressed about the precedent allowing such structures could create were they to be permitted.
- Significant concern was expressed regarding the CCTV installation, including the absence of required signage and the potential breach of General Data Protection Regulation (GDPR) legal requirements. It was noted that the CCTV installation contributed further to the sense of urbanisation and reinforced perceptions that the site was being operated in a commercial manner inconsistent with its rural context. Members questioned whether a stop notice should be considered.

- Members discussed the inclusion of the sentence *‘These impacts are further exacerbated by the site’s current use as allotments, resulting in a cluttered, urbanising effect that detracts from the rural character of the surrounding landscape’* in paragraph 9.1 of the report. Members questioned whether such wording had the potential to confuse as it conflicted with the advice to consider only the structures before them, rather than the wider site activity. They debated whether the contested sentence should be removed from the reason for refusal to avoid ambiguity. Differing views were presented on whether removal might weaken or confuse the planning rationale or whether retention might inadvertently endorse consideration of the wider site activity.

207. Members were advised:

- Detailed legal research had been undertaken prior to the meeting and confirmed that the statutory definition of agriculture within Section 336 of the Town and Country Planning Act 1990 includes horticulture. Further, relevant case law supports the position that allotments fall within horticulture and therefore within agriculture. As such, the use of the land as allotments did not constitute a material change of use requiring planning permission.
- It was confirmed that enforcement work was ongoing. Officers had been made aware of the operation soon after setup and continued to gather the information necessary to ensure any action undertaken did so on a sound legal footing.
- Clarification was provided that the removal of the wording *‘These impacts are further exacerbated by the site’s current use as allotments, resulting in a cluttered, urbanising effect that detracts from the rural character of the surrounding landscape’* in paragraph 9.1 would not weaken the reasons for refusal. of the officer report. It was confirmed that the presence or absence of this sentence within the reason for refusal would not limit the Authority’s ability to pursue separate enforcement action or assess other elements of the site independently in the future. Members were reassured that the impacts cited in the officer report: industrial appearance, urbanising effect, incongruity within the rural setting, and impact on users of the public right of way were sufficient, clear, and robust.

208. It was proposed, seconded but not approved that Paragraph 9.1 be amended to remove the sentence *‘These impacts are further exacerbated by the site’s current use as allotments, resulting in a cluttered, urbanising effect that detracts from the rural character of the surrounding landscape.’*

209. **RESOLVED:** That planning permission be refused for the reasons set out in paragraph 9.1 of the report.

ITEM 7: RETROFITTING HISTORIC BUILDINGS FOR ENERGY EFFICIENCY AND CARBON REDUCTION TECHNICAL ADVICE NOTE

210. The Officer reminded Members of the report (Report PC25/26-42).

211. The Committee considered the report by the Director of Placemaking (Report PC25/26-42) and commented as follows:

- Welcomed the Technical Advice Note (TAN), commented that it was comprehensive and could serve as a valuable reference point. They noted many residents were keen for this level of advice and highlighted the need for the document to remain a living resource given the pace of technological change.
- Clarification was sought on the meaning of the phrase *‘practical day-to-day measures in how you live in the building’* in the introductory section.
- Concern was expressed that the Figure 4 on page 3, depicting battens added to the sides of joists, did not clearly demonstrate the intended concept.
- Questioned whether the word *‘temporary’* was necessary in the chimney guidance on page 7 of the TAN, and whether the section should more directly address ventilation, energy retention, and moisture management in historic structures.

- Noted that the TAN recommended that each case be considered on its merits but asked whether the TAN could provide clearer guidance on issues around condensation associated with single glazing and the relative merits of secondary and double glazing.
- Questioned whether a stronger encouragement for double glazing, where design and heritage constraints allowed, should be stated.
- Clarification was requested on Section 3.2 and the reference to adapting heating systems to minimise demand when charging an Electric Vehicle (EV).
- Concerns were expressed that applicants might interpret the term microgeneration too broadly, potentially leading to proposals for wind turbines unsuitable for sensitive historic or landscape settings. It was suggested that clearer guidance or defined thresholds might be appropriate.
- Members noted that several photographs, particularly those depicting EV charging installations and plant-room layouts, did not appear to correspond to historic or listed buildings. It was suggested that imagery should more accurately reflect the types of properties to which the TAN applied.
- Consideration was given to the space requirements of plant rooms, with concern that the TAN illustrated their appearance without providing sufficient textual explanation of spatial impact, especially where installations might affect the character or fabric of a listed building. It was suggested that this be addressed more explicitly.
- Questioned whether building control fees should be acknowledged, particularly for works such as roof replacements or major energy-efficiency upgrades, as homeowners may be unaware of additional regulatory requirements or associated costs.
- Noted that although the TAN could be challenging to navigate when viewed on-screen, as the two-column format sometimes separated related text. It was suggested that the online presentation be adapted to improve cross-referencing.
- The inverted pyramid diagram in Figure 1 was discussed, with observations that the ordering of examples, particularly the reference to replacing boilers, could be refined to better reflect the hierarchy of energy-efficiency measures. A suggestion was made to adjust the sequence to improve clarity.
- Suggested that the TAN include a clearer explanation of its relationship to Historic England guidance, building regulations, the Local Plan, and wider statutory responsibilities, to show where it sat within the hierarchy of guidance.
- The colour-coded system in Appendix A was discussed, with feedback that the use of red, amber and green indicators could cause confusion or accessibility issues. Members suggested that the inclusion symbols might provide greater clarity and accommodate users with colour-vision impairments. The insertion of the phrase '*Do you need permission*' might reduce potential confusion around colour coding.

212. Members were advised:

- The phrase '*practical day-to-day measures in how you live in the building*' referred to the principle of reducing energy demand before implementing technological interventions, aligning with the whole-building approach.
- It was confirmed that Figure 4 had been sourced from Historic England guidance. Consideration would be given to repositioning or replacing the image to ensure clearer alignment with the related text.
- The inclusion of the term '*temporary*' in the chimney guidance reflected the need for historic buildings to retain natural ventilation pathways. Temporary measures, such as chimney balloons, ensured reversibility and helped prevent unintended moisture-related harm.

- The TAN separated interventions such as secondary glazing from full window replacement to ensure heritage impacts were properly weighed. Officers confirmed that Historic England was preparing additional detailed guidance on window and door replacement, which would complement future work by the Authority.
- Commentary on EV infrastructure and heating systems would be revisited with specialist officers to ensure clearer drafting and improved explanation, including adapting heating systems.
- The definition of “microgeneration” was established within energy legislation and based on kilowatt capacity rather than physical size. The wording would be reviewed and consideration given to the inclusion of a term such as ‘small-scale micro wind turbines’ to avoid misinterpretation.
- Some imagery, particularly EV charging units, was taken from existing public guidance materials, but the selection would be reviewed with consideration given to substituting images more representative of historic buildings where appropriate.
- Additional explanation could be incorporated to outline potential spatial impacts associated with plant and encourage applicants to consider heritage constraints when planning mechanical installations.
- Building regulations were not covered by the TAN to avoid duplicating statutory guidance. The introductory text would be reviewed with the aim of clarifying that separate building-control approval may be required and that homeowners should seek advice from their local authority.
- Improvements would be considered for online presentation, including enabling two-page viewing to help users view diagrams and related text together more easily.
- Figure 1 could be adjusted to reorder examples where appropriate, ensuring the message remained consistent with the whole-building approach while addressing concerns about perceived emphasis on gas boilers.
- Additional explanatory material could be added to the introduction to demonstrate how the TAN aligned with Historic England guidance, the Local Plan, and other regulatory expectations.
- Officers agreed to review the colours and layout used in Appendix A to improve accessibility and reduce the risk of misinterpretation, potentially using symbols or alternative visual cues.

213. RESOLVED:

- 1) Approved the Retrofitting Historic Buildings for Energy Efficiency and Carbon Reduction Technical Advice Note as set out in Appendix 1 for publication subject to any changes proposed by the Committee.
- 2) Delegated authority to the Director of Placemaking in consultation with the Chair of Planning Committee to make any minor changes to the Retrofitting Historic Buildings for Energy Efficiency and Carbon Reduction Technical Advice Note.

ITEM 8: MAKING OF EAST DEAN & FRISTON NEIGHBOURHOOD DEVELOPMENT PLAN

214. The Officer reminded Members of the report (Report PC25/26-43).
215. The Committee considered the report by the Director of Placemaking (Report PC25/26-43) and commented as follows:
- Welcomed the Neighbourhood Development Plan (NDP), praising the work undertaken by the parish, noting the character and landscape qualities of the area, and expressing appreciation for the positive and proactive approach taken by residents to manage planning matters within their community.

- Noted that the NDP contained no allocations for development.
 - Members welcomed the 95% 'yes' vote and strong turnout, reflecting a high degree of engagement and local ownership.
216. Members were advised:
- The parish had sought guidance on whether to allocate sites as part of the Plan and were advised that allocation was not required due to the highly constrained nature of the area. These constraints justified the absence of site allocations.
 - East Dean & Friston had not been allocated housing numbers in the adopted Local Plan due to the high level of physical and environmental constraints.
217. **RESOLVED:**
- 1) Noted the outcome of the East Dean & Friston Neighbourhood Development Plan (NDP) Referendum.
 - 2) Agreed to make the East Dean & Friston Neighbourhood Development Plan part of the SDNPA's Development Plan for the Parish of East Dean & Friston.
218. The Chair closed the meeting at 11.28am

CHAIR

Signed: _____