

Agenda Item 8
Report PC66/15

Report to	Planning Committee
Date	10 September 2015
By	Director of Planning
Local Authority	Lewes District Council
Application Number	SDNP/15/01682/FUL
Applicant	Mr J Wallden – Ditchling Rugby Club
Application	Change of use of land to provide two rugby pitches and associated car parking for Ditchling Rugby Club
Address	Land at Keymer Road, Ditchling East Sussex

Recommendation: That planning permission be refused for the reasons set out in Paragraph 10.1 of this report.

Executive Summary

This application seeks permission for the change of use of agricultural land to provide 2 rugby pitches and associated car parking within the strategic gap between the villages of Ditchling to the east and Keymer to the west. Keymer Road (B2116) is located to the north of the fields (and the car park would be accessed from this road). New Road (B2112) is located to the south of the site. A footpath is located in the southern part of the site which links New Road with The Drove which runs along the northern part of the eastern boundary of the site.

Whilst the need for permanent facilities to meet the identified need for the club are recognised and noted, the site is in a sensitive location, set in the strategic gap between the two villages of Ditchling and Keymer and there is concern that the introduction of a formal recreation area, together with associated parking would erode the important landscape character of the area. In addition, the inadequacy of the proposed parking provision to meet the specific needs of such a use and lack of turning space within the car park would cause hazards to the free flow of traffic on the B2166.

The application is placed before the Committee due to the significant number of representations received.

I. Site Description

- 1.1 The site in question lies between the villages of Ditchling to the east and Keymer to the west and comprises two large pasture fields and a smaller pasture field of semi improved grassland bounded by hedgerows with some mature oak field trees. A Public Right of Way (PRoW) runs along the site's eastern edge from the B2112 passing 1 & 2 Drove Cottages to the B2116. From this right of way there are views across the site towards the Ditchling and Keymer church spires and to Oldland windmill to the north.
- 1.2 The site lies within the South Downs Integrated Landscape Character Assessment (SDILCA) Type: Scarp Footslopes Area: 12 Adur to Ouse Scarp Footslope. The relevant key characteristics for this type and area include a complex geology comprising bands of lower chalk, mudstones and sandstones giving rise to a locally undulating landform. The area forms a transition between the steep chalk scarp to the south and the Low Weald to the north. Large straight sided arable fields are close to the scarp foot which have encroached up on to the scarp in places. There is a mosaic of farmland and woodland comprising irregular fields of arable and pasture bounded by an intact network of thick hedgerows, with hedgerow oaks and woodland. Streams arising from the springs at the foot of the chalk flow northward in

narrow hidden stream valleys, some enshrouded in woodland. Villages, located on the springline are often associated with springs, ponds and mills. The steep chalk scarp provides a dramatic backdrop. Impressive panoramic views onto the footslopes from the adjacent scarp and downs reveal a balanced woodland and farmland mosaic.

- 1.3 The site is split into two distinctive parts. The northern part of the site is adjacent to Keymer Road and the land drops away from north to south with the land only beginning to level out as it meets with a boundary hedgerow and a small stream which cuts through the application site. The northern part has a number of small trees and vegetation fairly centrally within the field and a strong hedgerow boundary with Keymer Road. The eastern boundary with the Drove also has a relatively strong screening, but does provide gaps for access through to the Drove.
- 1.4 The southern part of the site is more level than the northern part and only has a few fairly prominent trees towards the centre of this field. Strong boundary hedging is located to the south, east and west. Having said this, the land is not totally flat and any development to provide sports pitches would require an element of cut and fill (though not to a significant level).
- 1.5 Beyond the site, to the west, lies St James Cricket Club pitch and pavilion (accessed from Keymer Road).
- 1.6 From within the site the Downs to the south are clearly visible beyond New Road.

2. Relevant Planning History

- 2.1 There is no relevant recent planning history in relation to the application site.
- 2.2 Applications relating to the land to the west (cricket club) for an additional cricket pitch and a new access to serve an overflow car park in 2003 and 2004 are considered of relevance (LW/03/1958 & LW/04/0450). These were both refused permission. LW/04/0450 was appealed but appears to have then been withdrawn. An additional application in 2006 (LW/06/0249) secured permission for the additional cricket pitch which now currently exists to the immediate west of the application site.

3. Proposal

- 3.1 The applicant seeks permission for the change of use of the land to provide two rugby pitches in the southern field with an associated car parking area being formed in the northern field, with access from Keymer Road.
- 3.2 The proposals specifically involve a formal vehicular access from Keymer Road down to the lower part of the northern field where the car park (with provision of 40 spaces) would be located. To the north of the car park additional landscaping would be introduced as would swale ponds. Further native species planting would be introduced to the east to aid screening of low level views from 1 & 2 Drove Cottages. A 1.5m high solid screen fence would also be constructed between the car park and the planting to avoid vehicle lights intruding on the cottages. A footpath connection from the car park to the Drove (north of the cottages) would be introduced to provide pedestrian access from the car park to the rugby pitches (via the public right of way). Elsewhere within the northern field a new hedge would be set back from the visibility splays and the existing hedge along the northern boundary would be 'gapped up'. The remaining areas between the road boundary and the proposed planting and swale ponds would be wildflower meadow with the western corner of the site being Wet Area Wildflower Meadow.
- 3.3 The proposed rugby pitches would be located in the southern field separated by the three trees in the centre of the field. In order to provide the rugby pitches a small element of cut and fill would be required given that the southern field is not level (amounting to just under a metre at either end of the northernmost pitch and approximately half that on the southernmost pitch).

4. Consultations

4.1 Highways – Recommend Refusal

- Increased traffic hazards on the B2116 (Keymer Road) by reason of inadequate visibility at the proposed access (subsequent response removing this objection)
- Inadequate turning facilities within the site and reversing vehicles to and from the site onto the public highway causing interference with the free flow and safety of traffic on the B2116.
- Inadequate parking facilities resulting in additional congestion on the public highway causing interference with the free flow and safety of traffic on the B2116.

4.2 Landscape – Recommend Refusal

- Whilst the provision of sports pitches could be regarded as green space, in this location it is considered that the change of use from agricultural pasture to sports pitches and associated parking and sporting activity would alter the existing rural character of the fields to a peri-urban character and hence have an impact on the rural setting of the village and surrounding area.
- The site is part of the strategic gap between Ditchling and Keymer and it is considered that the proposed use would have a detrimental impact on this function of the land; narrowing the gap through the extension of formal sporting activity into the rural landscape.
- The introduction of the hard surfaced road and car park will result in an intensified use with the introduction of vehicular movements.
- Whilst mitigation planting would provide beneficial screening the introduction of new planting into an open field is not necessarily considered a positive effect on the openness of the landscape character and would result in the loss of views from the adjacent public right of way across an open pasture field.
- The overall intensification of the use and resulting adverse effects on the landscape and users of the surrounding footpaths and rural lanes is not considered to be in line with the purpose of the National Park to conserve and enhance the area's natural beauty.
- Concern about the proposed culverting of an existing water course beneath the proposed sports pitches.

4.3 Rights of Way – No objection

- Contingent upon access to public footpath being maintained at all times.
- Applicant should be informed of the existence of the footpath.

4.4 Sport England – Supports application

- Would be advisable to locate the parking closer to the cricket club house or link the car park to the clubhouse via a pathway.
- Recommend a ground conditions assessment is undertaken to recommend a scheme for preparing the playing fields to the required specification. This can be secured by condition.

4.5 Ditchling Parish Council – Strong Objection

- The area lies outside any planning boundary as identified by Lewes District Council and is countryside defined as being within the National Park, where development other than related to agriculture, forestry or any other rural enterprise would be resisted.
- It is contrary to the purposes of the National Park. It is essential to retain and protect the strategic gap between the villages.
- The sports fields would have an adverse impact on this.
- The site lies in an area which floods.
- The dangers associated with the entrance to the Sports Complex when approached from Ditchling due to the blind bend in the road.

- The Council supported the letters of objections from neighbours, residents and other bodies.

4.6 **Hassocks Parish Council – Objection raised**

- The proposal would infringe the local gap between Hassocks and Ditchling, and increase traffic on the B2116.
- The parish council supports Ditchling parish council in its opposition to this application.

4.7 **Archaeology – No objection subject to condition**

4.8 **Environment Agency – No Objections**

4.9 **Drainage Officer – Comments Awaited**

4.10 **Ecologist – Comments Awaited**

4.11 **Natural England – Comments Awaited.**

5. **Representations**

5.1 **55 Letters of objection:**

- Traffic entering and leaving will add to congestion and noise pollution.
- Access would be on a very dangerous section of Keymer Road.
- The footpath that runs north to south could be dangerous to use due to traffic.
- Development of a car park will destroy the wet grassland habitat. Inappropriate in location, access and size. Ancient hedging will be destroyed in order to provide a car park.
- Concerns that parking statistics are incorrect and underplayed.
- The change of use will have an effect on the listed buildings, their occupants and uses.
- Impact on the amenity of residents in The Drove. Noise of spectators walking to and from the site. Noise of cars within the car park. Loss of the attractive view from these houses. Loss of amenity to houses in Clayton Road
- Not a necessity in that considerable money has been spent on pitches at Ditchling Recreation Ground to improve playing conditions where there is also parking for the teams. Surely further improvement of the existing site should be considered.
- Concern about precedent and potential further development (clubhouse, floodlights, signage).
- Need to protect Keymer, Ditchling and Westmeston being turned into suburbs.
- Will change the outlook from the Beacon, village, surrounding countryside, Lodge Hill, impacting on uninterrupted views of agricultural countryside and the Downs.
- Value of undulating open fields with sheep and wildlife will be replaced by monotonous flat green fields. Contours of land will change.
- Site will get relatively little use for the adverse impact it will create. Little economic benefit to the local community. Majority of team members do not live in Ditchling.
- Rugby Posts standing over ancient hedgerows will not conserve and enhance the natural beauty of the park.
- At present fields are used for production of hay and occasional grazing of sheep. Both fields are wildflower meadows with a wide variety of butterflies, insects and moths. Loss of biodiversity. Suggestion that newts might be present. Ecology report is inadequate and makes no reference to its value as a long established water meadow.
- Drainage issues with current fields
- The site represents the last undeveloped area of land between the villages of Keymer and Ditchling and it is important to retain the gap and consequently village atmosphere between the villages. Value of gap has already been diminished by development of cricket club.

- Loss of agricultural land.
- Loss of habitat along the stream and its associated ditches.
- Potential damage to oak trees.
- Disturbance, loss of privacy and visual amenity to nearby residents.

5.2 Letter of objection from Ditchling Society:

- Farmed fields preserve a strategic gap between the villages and act as vital protection against continuous development between the villages of Hurstpierpoint, Hassocks, Keymer and eastwards.
- The site receives considerable ground and surface water from the Downs, is poorly drained and floods each winter. Landscaping works will not only change the appearance but cause flooding problems elsewhere.
- The Society has concerns that the Rugby Club will look to build their own pavilion and use the pitches to full capacity.
- The Car park has implications for access, disturbance and drainage. If the club can use the cricket pavilion, why can they not use the parking?
- Whilst the need for upgraded recreational facilities is recognised, this should be negotiated in conjunction with the Parish Council and local community.

5.3 Letter of Objection from Ditchling, Streat and Westmeston Neighbourhood Plan Project Management Team

- Resident's questionnaire response showed a desire to conserve the rural identities of the settlements within the area and to protect valuable open spaces and particularly the countryside that separates the settlements from adjoining urban development, with particular reference to the strategic greenfield gap down the Keymer Road between Ditchling village and Keymer/Hassocks.
- In 2004 the cricket club sought permission for an additional cricket pitch and car park. The car park element was never approved, but a subsequent scheme for just the additional pitch was approved. The Rugby club is now proposing exactly what the cricket club proposed to do unsuccessfully 11 years ago.
- The proposals would entail the loss of ancient hedgerow, and both car park and pitches would entail re-alignment of ancient ditches and water courses.
- Proposals would directly abut the Ditchling Village Conservation Area. It is considered that this is an unacceptable encroachment on the boundary and listed buildings.
- Ditchling Parish Council is in negotiations to purchase a field on the north side of Keymer Road for parking which would not involve the same landscape damage as the proposals. It is not considered that the proposed car park would be an appropriate Community Car Park.
- Concern that works to improve drainage/flooding of the site may lead to run off elsewhere.
- An extensive archaeological survey should be conducted before consideration should be given to this application.
- Concerns about practicalities of sharing facilities with Cricket Club and potential further applications for facilities that the site currently lacks.
- Concerns about the impact on the amenity currently enjoyed by properties in The Drove, in relation to noise and privacy.

5.4 15 Letters of Support

- Club has welcomed links with members of University of Sussex Team when it came into some trouble.
- Sport has been an integral part of the English countryside with social benefits of team sport within a community.

- Whilst players travel from outside the village, their commitment to the cause shows a passion for the club and the community.
- Currently the club is attempting to play on one less than appropriate pitch.
- Club has been going for 53 years, is not small or a 'part-time club'. It is a vibrant local hub. Difficulties with the pitch at the front of the recreation ground resulted in a return to the old pitch, however this is not fit for purpose and dangerous (slanting pitch, numerous divots).
- Grant given to Parish Council to drain the recreation ground but this was only to the football pitch.
- Somewhat limited in potential for growth at the recreation ground.
- Proposal will create a free car park in the village which will reduce congestion
- Drainage will be done in a similar vein to 'Super Trenchers' when very little damage is done to the land.
- Long term plan is to have a car park and if funds and permission occurs a club house.
- Wish to create a junior section for the village, future senior sides, but more importantly a thriving sports club in the village that is open to all.
- Ditchling RFC are a huge credit to the community. To further progression and encourage new talent into the club they need to expand their platform. This proposal would allow them to increase youth involvement, similar to that undertaken at the cricket club.
- The move will take pressure off the Community Sports Field site and will ensure the proposed area does not get developed for housing.
- The proposed site is closer to the village and will bring revenue into the village.
- The ground will adjoin the long established neighbouring cricket club

5.5 Letter of Support from Applicant

- Ditchling has had a chequered past in the number of sides they could field since forming in 1963, rising to 4 teams at one point but now down to 2.
- The club has been at the same venue from the off and have lived with its annoying slope, 55m width and shocking drainage.
- The club has been involved in a search for a new ground for many years. The owner has expressed an interest to sell but were not prepared to talk further until consent was gained.
- For the club to survive there is a need to start youth rugby.

6. Planning Policy Context

6.1 Applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. The statutory development plan in this area comprises the Lewes District Local Plan 2003 and the Emerging Lewes District Local Plan Joint Core Strategy. The relevant policies to this proposal are set out below.

National Park Purposes

6.2 The two statutory purposes of the SDNP designation are:

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

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

National Planning Policy Framework and Circular 2010

6.4 Government policy relating to National Parks is set out in English National Parks and the Broads: UK Government Vision and Circular 2010 and The National Planning Policy

Framework (NPPF) which was issued and came into effect on 27 March 2012. The Circular and NPPF confirm that National Parks have the highest status of protection and the NPPF states at paragraph 115 that great weight should be given to conserving landscape and scenic beauty in the national parks and that the conservation of wildlife and cultural heritage are important considerations and should also be given great weight in National Parks.

- 6.5 The development plan policies listed below have been assessed for their compliance with the NPPF and are considered to be compliant with the NPPF.
- 6.6 The South Downs Partnership Management Plan (SDPMP) was adopted on 3 December 2013. It sets out a Vision and long term Outcomes for the National Park, as well as 5 year Policies and a continually updated Delivery Framework. The SDPMP is a material consideration in planning applications and has some weight pending adoption of the SDNP Local Plan. Relevant policies are 1, 3, 9, 28, 29, 37, 39, 48 and 49
- 6.7 Policy 1 seeks to conserve and enhance the natural beauty and special qualities of the landscape and its setting, in ways that allow it to continue to evolve and become more resilient to the impacts of climate change and other pressures.
- 6.8 Policy 3 seeks to protect and enhance tranquility and dark night skies.
- 6.9 Policy 9 relates to the historic environment.
- 6.10 Policy 28 seeks to improve rights of way
- 6.11 Policy 29 seeks to enhance the health and wellbeing of residents and visitors by encouraging, supporting and developing the use of the Park as a place for healthy outdoor activity and relaxation.
- 6.12 Policies 37 and 39 seek to encourage cycling and manage vehicle parking.
- 6.13 Policy 48 seeks to support the towns and villages in and around the National Park to enhance their vital role as social and economic hubs.
- 6.14 Policy 49 seeks to maintain and improve access to a range of essential community services and facilities for communities in the National Park.

7. Planning Policy

- 7.1 The following saved policies of the Lewes District Local Plan 2003 are relevant to this proposal:
 - ST3 – Design, Form and Setting of Development
 - ST11 & ST12 – Landscaping of Development
 - CT2 – Landscaping, Conservation and Enhancement
 - H5 – Development within or affecting Conservation Areas.
 - RE1 – Provision of Sport, Recreation and Play
 - T8-T10 – Pedestrian Routes and Traffic Calming
 - T13-T14 – Vehicle Parking
- 7.2 The relevant policies of the Lewes District Local Plan Joint Core Strategy are:
 - CP7 – Infrastructure
 - CP8 – Green Infrastructure
 - CP10 – Natural Environment and Landscape Character
 - CP11 – Built and Historic Environment and High Quality Design
 - CP12 – Flood Risk, Coastal Erosion, sustainable Drainage and Slope Stability
 - CP13 – Sustainable Travel

8. Planning Assessment

Introduction

- 8.1 This application for the use of the land as 2 rugby pitches and a car park needs primarily to accord with central government planning policies contained within the NPPF and Policies

contained within the Local Plan (this being the Lewes District Local Plan (2003)) and the Lewes Joint Core Strategy.

8.2 Given the location of the development in relation to the surrounding landscape, the villages of Ditchling and Keymer and to the B2116 to the north, and the adjacent Conservation Area to the east, the key issues in this case are:-

- The principle of development
- The impact of the proposals on the landscape and on the character of the adjacent Conservation Area
- Impact of the proposals on Highways.
- Impact of the proposals on Ecology within the site
- Impact on flood risk
- Impact on the amenity of neighbouring residential properties.

Principle of Development

8.3 The principle of provision of sport, recreation and play space is generally supported in saved Policy RE1 of the Lewes District Local Plan. Core Policy 8 of the Emerging Joint Core Strategy whilst supporting the introduction of infrastructure (which includes play areas and leisure uses) confirms that such facilities should be located within the defined planning boundaries. In this particular case the proposed site falls outside any defined settlement (in effect falling between the villages of Ditchling and Keymer.

8.4 Whilst Policies generally tend to support the introduction of sports and recreation facilities and the benefits that this bring, it is important that these are provided in appropriate locations where there would not be an unacceptable impact on the landscape character of the surrounding area.

8.5 This echoes the purposes of the park which seek to conserve and enhance the natural beauty of the area. As part of meeting this purpose there is duty to meet to the socio-economic needs of the Park and the provision of recreation facilities could be seen to be meeting this duty, however the conservation and enhancement of the landscape beauty is of paramount importance and therefore needs to be considered in light of this.

Impact on the landscape character of the area and the adjoining conservation area

8.6 The site currently forms part of a wider patchwork of gently undulating pasture fields and these contribute to the rural setting of the two villages of Keymer and Ditchling. The site is visible from a number of surrounding roads, most notably to the north, south and east. The site is also visible from the Public Right of Way which runs along the eastern boundary and then through the site. The location of the site is such that it can be viewed from long reaching views on the South Downs Way, to the south.

8.7 The existing fields not only contribute to the rural setting of the villages but also provide a separation between the formalised cricket pitches on the edge of Keymer and the built form of Ditchling. Whilst it could be considered that the provision of rugby pitches can be regarded as 'green space' the formalisation of the land and associated activities resulting from the proposed change of use would inevitably alter the existing rural character of the fields and thus have an impact on the rural setting of the village and the surrounding area.

8.8 The submitted landscape impact appraisal describes how the siting of the proposed car park has been developed through consideration of its potential visual effects on users of the surrounding area utilising existing screening and proposing additional planting. Whilst this is noted it has meant that an access road dividing the existing field is required. The required road would be visible despite proposed planting and in any event the introduction of additional planting into an open field is not considered to result in positive effect on the openness of the existing landscape character and would result in the loss of views from the adjacent public right of way.

8.9 The loss of the open character of the fields together with a more formalised recreation area, and intensified use would have an unacceptable impact on the existing landscape character of

the area and would further reduce the strategic gap function that the site currently provides.

- 8.10 More generally there are concerns that despite assurances that there will be no built structures and external lighting, this will not always be practical or feasible and that there may be pressure at a later date to introduce further infrastructure. In addition, whilst the applicant has inferred that the rugby posts would be removed over the summer, they would clearly remain for most of the year. In addition, concern is raised that, were the principle of the proposal to be accepted, this would inevitably lead to additional buildings in the future to meet the aspirations of the club, as highlighted by the applicants submitted comments. Such further building(s) infrastructure and revised parking arrangements could potentially further erode the landscape character in this sensitive location.
- 8.11 The site also adjoins the Conservation Area and there are concerns that the changing character from an agricultural field to formalised recreation area would neither preserve nor enhance the character of the adjoining conservation area.

Impact of the proposals on Highways

- 8.12 A number of issues have been raised by highways in relation to the scheme. In particular the issues of visibility splays, parking provision, manoeuvrability within the site are highlighted.
- 8.13 Visibility: The Highways officer originally raised concerns in relation to the visibility splays for the new access onto the B2116. The applicant has subsequently submitted 2 additional speed surveys to the west of the site. These reveal that the speed of traffic is slowing down from 50 towards the west end of the straight then down to 44mph. as the 85%ile speed of traffic at the 30mph speed limit sign travelling eastbound was 34mph it was concluded that traffic is slowing down considerably towards the 30mph sign and is likely to be closer to 34mph and therefore 54 metres visibility distances are acceptable. The visibility of vehicles waiting to turn right into the access is approximately 85 metres which is well in excess of the 54 metres required and is therefore considered acceptable.
- 8.14 Turning within the site: On the basis of the submitted plans it had not been demonstrated that a coach could adequately park and turn around within the site. In the absence of this demonstration it is considered that the proposals would cause hazards to be introduced by the interference with the free flow and safety traffic on the B2116 (Keymer Road)
- 8.15 Parking Provision: The Highways Authority have raised concerns with regard to the details in the submitted transport statement which suggests a likely generation of 40 vehicular trips per match (80 if there are 2 matches). The Highways Authority considered the proposals would generate at least 46 trips (if car sharing involved) or even 92 trips per match if all were to arrive individually. These figures do not take into account supporters arriving separately. Concern was therefore raised that the parking provision was inadequate.
- 8.16 The applicant submitted amended plans for consideration however these were not accepted given the overarching concern with regard to the landscape impact. Notwithstanding this, the submitted amendments provided a looser layout of parking and enabled a coach to turn around within the site. The Highways Authority considered that the revised layout would have allowed for further parking in the future and also overspill parking along the long driveway such as to address their concern. However, on the basis of the existing layout it is considered that the Highway objection remains in relation to on-site turning and parking and the provision is inadequate. (It is also important to note that, should the amended plans have been considered to have addressed the highways issues, this does not necessarily mean that the layout would have been acceptable in landscape terms)

Impact of the proposals on the ecology within the site.

- 8.17 The applicant has submitted an Extend Phase I Habitat Survey as part of the supporting document with the application. The recommendations of the survey are as follows:-
- The hedgerows are retained as far as possible as these constitute a habitat of principal importance. A watching brief will be required should removal of hedgerows be carried out in the bird breeding seasons.
 - A watching brief should be set in place before the car park and pitches are stripped and constructed. There should be two sward cuts of any longer vegetation. Any reptiles in

these areas are anticipated to move unassisted to other contiguous and undisturbed areas during this disturbance.

- It is recommended that the areas affected by Himalayan Balsam are treated with herbicide as soon as possible.
- The three mature oaks should be retained if at all possible. Root protection areas should be calculated and appropriate tree protection erected during the construction phase
- Biodiversity of the site could be maintained or enhanced with the inclusion of some, but not necessarily all, of the following: addition of bat and bird boxes to new buildings on site and trees at the sites perimeter and centre. Planting where possible of at least 30% local provenance species to encourage invertebrates. Addition of log and brick/rubble piles around perimeter of the site to encourage reptiles, invertebrates and foraging bats and birds. Digging of new ponds to encourage amphibians and foraging bats
- Updated survey should be undertaken before any development decisions have been made at the site if more than 12 months have elapsed from the date of the survey (21 September 2015).

8.18 The submitted survey is in the process of being assessed by the County Ecologist and her comments are awaited. Members will be updated accordingly.

Impact on flood risk

8.19 The County Drainage officer and the Environment Agency have been consulted on the proposals. Environment Agency have no objections but the comments from the Drainage Team are awaited. Members will be updated accordingly.

Impact on the amenity of neighbouring residents

8.20 The proposals would certainly result in significantly greater activity than currently exists within the fields in question and the road and footpath at the eastern boundary of the site. The properties which would be predominantly affected would be 1 & 2 Drove Cottages, The Drove.

8.21 The proposed car park would be located opposite the front of these properties and proposed works to reduce any impact on the properties by way of light pollution would essentially result in more screening and the loss or reduction of a view to the west. The loss of a view is not a material consideration and it is not considered that the introduction of additional planting would appear unacceptable or overbearing in this location and a refusal on this basis could not be sustained.

8.22 The proposal effectively includes the provision of a footpath onto The Drove to direct players, spectators etc. past the residential properties and into the southern field. Inevitably there would therefore be greater activity along this rural lane than currently exists, however this would only be for short periods when games are being played. It is not considered that the limited increase in activity past the properties over such short periods would result in such an adverse impact on the amenity of properties as to justify refusal. Whilst there may be some noise as people arrive and leave the rugby pitches, this would be short lived and not continuous noise that could warrant refusal. Environmental Health have however been consulted and their views in relation to noise levels within the fields and car park are awaited. Members will be updated accordingly.

9. Conclusion

9.1 There is general support for opportunities to support the creation of recreation/sport facilities within the National Park and there is some sympathy with the efforts of the Rugby Club to find suitable premises to meet the needs of the club and the benefits that this would bring the village. It is however considered that the proposed site is in a sensitive location, as part of the gap that exists between Ditchling and Keymer. In addition, the existing patchwork of undulating pasture fields would be adversely affected by the introduction of a more formalised recreational 'green space' together with the associated car park that is required as to have an adverse impact on the landscape character of the surrounding area

and the conservation area. The proposal is therefore considered to be contrary to local policy, national policy and the Purposes of the National Park.

- 9.2 In addition, the proposed layout would result in an impact on highway safety by virtue of the the insufficient parking spaces and the inadequate layout for the parking area to enable manoeuvring within the site. Refusal is therefore recommended on this basis too.

10. Reason for Recommendation

10.1 Application SDNP/15/01682/FUL is recommended for refusal for the following reasons:

1. The proposal, by virtue of its nature, extent, resultant parking area and associated human/vehicular activity would have an adverse impact on the landscape character area and the adjoining Conservation Area which could not be mitigated by additional landscaping, due to the location of the site and surrounding topography. The proposal is therefore considered to be contrary to Paragraph 115 of the NPPF which affords National Parks the highest status of protection in relation to scenic beauty, Saved Policies ST3, CT2 and H5 of the Lewes District Local Plan (2003) and Core Policies 8 & 10 of the Emerging Lewes District Local Plan Core Strategy.
2. The proposal does not provide for adequate turning facilities within the site and reversing vehicles to or from the site onto the public highway would cause hazards to be introduced by the interference with the free flow of safety and traffic on the B2116 (Keymer Road). The Proposals would therefore be contrary to Saved Policies T13 & T14 of the Lewes District Local Plan (2003), Core Policy 13 of the emerging Lewes District Local Plan Joint Core Strategy and the National Planning Policy Framework.
3. The proposal does not provide for adequate parking within the site causing hazards to be introduced by the interference with the free flow of safety and traffic on the B2116 (Keymer Road). The Proposals would therefore be contrary to Saved Policies T13 & T14 of the Lewes District Local Plan (2003), Core Policy 13 of the emerging Lewes District Local Plan Joint Core Strategy and the National Planning Policy Framework.

11. Crime and Disorder Implications

11.1 It is considered that the proposal does not raise any crime and disorder implications.

12. Human Rights Implications

12.1 This planning application has been considered in light of statute and case law and any interference with an individual's human rights is considered to be proportionate to the aims sought to be realised.

13. Equality Act 2010

13.1 Due regard has been taken of the South Downs National Park Authority's equality duty as contained within the Equality Act 2010.

14. Proactive Working

14.1 In reaching this decision the Local Planning Authority has worked with the applicant in a positive and proactive way, in line with the NPPF. This has included the provision of pre-application advice from the SDNPA Development Management Officer and SDNPA Historic Buildings Officer, two on site meetings and an office meeting, the opportunity to provide additional information to add additional value as identified by SDNPA Officers and consultees.

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email: rob.ainslie@southdowns.gov.uk
Appendices: I. Site Location Map
SDNPA Consultees: Director of Planning & Legal Services.

Background Documents:

<http://planningpublicaccess.southdowns.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=NMAHV0TUG0800>

National Planning Policy Framework

<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

National Planning Practise Guidance

<http://planningguidance.planningportal.gov.uk/>

SDNP Partnership Management Plan

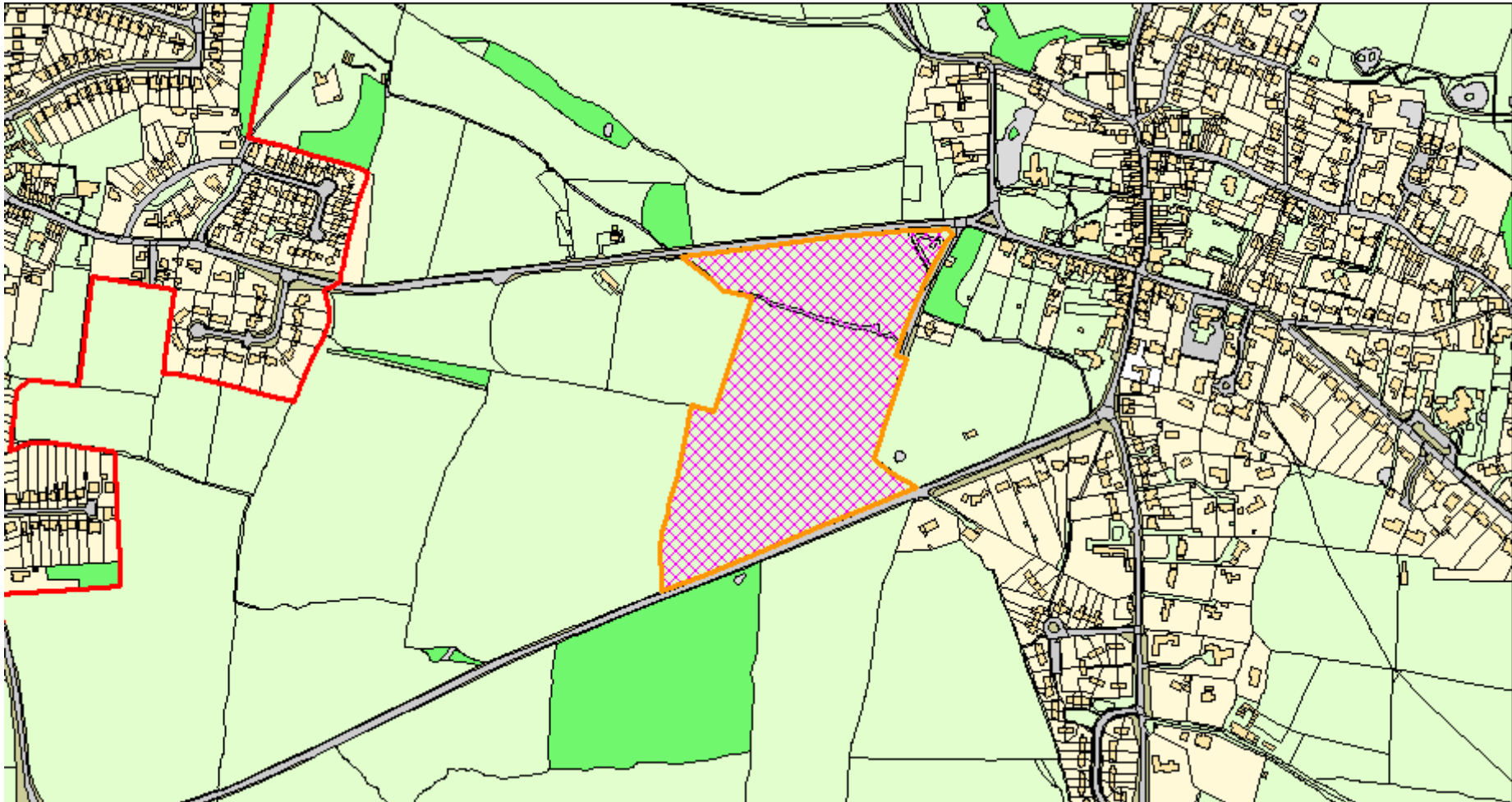
<http://www.southdowns.gov.uk/wp-content/uploads/2015/01/SDNP-Partnership-Management-Plan-2014-19.pdf>

Lewes District Local Plan (2003)

<http://www.lewes.gov.uk/planning/localplan.asp>

Lewes District Local Plan Joint Core Strategy

<http://www.lewes.gov.uk/corestrategy/index.asp>



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