



South Downs
National Park Authority

Agenda Item 11
Report PC71/18

Report to	Planning Committee
Date	8 November 2018
By	Director of Planning
Local Authority	Chichester District Council
Application Number	SDNP/15/01862/FUL
Applicant	West Sussex County Council
Application	Erect 34 dwellings, access and parking
Address	Land at Rotherlea, Dawtrey Road, Petworth, GU28 0EA.

Recommendation:

- 1) **That planning permission be granted for the reasons and subject to the conditions set out in Section 10 of this report and subject to the completion of a S106 agreement with obligations relating to:**
 - **A provision of 13 dwellings (38%) on site for affordable housing.**
 - **A contribution of £79,800 towards off site affordable housing.**
 - **A management plan securing the long term retention and management of the approved landscape details for the site.**
 - 2) **That authority be delegated to the Director of Planning to refuse the application, with appropriate reasons if the S106 agreement is not substantially completed or substantial progress has not been made within 3 months of the 8 November 2018 Planning Committee meeting.**
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Executive Summary

This application seeks permission for 34 dwellings with access from Dawtrey Road.

The principle of residential development on this vacant site (which was formerly the playing fields for a school which was demolished in order for the care home to the west to be built) is considered to be acceptable. It is located within the built settlement of Petworth and also allocated for residential development within the recently made Petworth Neighbourhood Plan. There have been previous approvals for residential development on the site over time, none of which are extant.

The properties would predominantly be accessed from Dawtrey Road with 9 of the residential units being accessed from South Grove, to the south of the site.

The application has been with the Authority for some time. The scheme has been subject to a number of iterative changes in order to address mainly landscape and design issues, and to address the implications of the emerging now 'made' Petworth Neighbourhood Development Plan (NDP). The application is now considered acceptable in landscape and design terms. It is also considered to accord with the broad principles and policies in the NDP.

The proposal is considered to offer the required amount of affordable housing together with an appropriate mix of housing to meet local needs.

Over the timescale of the application there have been a number of objections to the scheme on a variety of matters with highways issues being a main concern. The Highways Authority has not raised an objection to the current scheme. There have been limited comments from interested parties to the plans which now form part of the proposals.

On balance the scheme is considered to be acceptable and in accordance with adopted policies. Planning permission is recommended subject to securing the affordable housing, a landscape management plan and imposition of a number of conditions.

The application is placed before the Committee for consideration given the number of representations received and the relationship with the Neighbourhood Plan.

1. Site Description

- 1.1 The application site is an “L” shaped plot on relatively level land, measuring 0.75Ha located in the southern area of the built up area of Petworth. The land was previously utilised as the playing fields of a school (which has now been demolished and redeveloped for a care home) and has lain vacant since 2006. There are areas of scrub, tarmac, grass and trees on site. A former school pond is located in the south western corner of the site in a small wooded area. The site is bounded by Littlecote Road to the north, South Grove to the south, Rotherlea to the west with open space to the east. There are significant trees on the southern boundary with South Grove and trees on the northern and eastern boundaries.
- 1.2 To the west of the site is a 2/3 storey 70 bed care home built on the site of the relocated school. There are two storey dwellings to the north along Littlecote and low density, two storey dwellings to the south along South Grove. The Herbert Shiner Centre (Formerly Herbert Shiner School) is located to the south east of the site and is accessed from South Grove. The complex now comprises of the Petworth C of E Primary School, Wakoos Centre4Children (a nursery), Petworth Children & Family Centre and also the administrative headquarters for West Sussex Music Trust.

2. Relevant Planning History

- 2.1 06/02432/CPO (on adjacent site) Proposed new care home (70 beds and 12 day care places) and demolition of primary school building – granted 15 November 2006 (by West Sussex County Council).
- 2.2 06/03325/OUT Erection of 43 no. 1, 2, 3 bed two and three storey houses and flats together with associated external works – granted 18 October 2006.
- 2.3 09/03857/EXT Application to extend implementation period of planning permission reference PW/06/03325/OUT. Erection of 43 no. 1, 2, 3 bed 2 and 3 storey houses and flats, together with associated external works – granted 25 December 2009.
- 2.4 SDNP/13/5402/OUT Erect 33 dwellings – Withdrawn 31 January 2014.

3. Proposal

- 3.1 This is a full application and consists of:
 - 11 market houses (2 x 2-bed, 6 x 3-bed and 3 x 4-bed) with gardens
 - 10 market flats (1 x 1 bed, 9 x 2 bed)
 - 7 affordable houses (3 x 2-bed and 4 x 3-bed) with gardens
 - 6 affordable flats/maisonettes (4 x 1 bed and 2 x 2 bed)
- 3.2 Two access roads are proposed, one from Dawtrey Road in a southerly direction to a turning head/landscaped area, the other in the south western corner of the site from South Grove, serving 9 flats.
- 3.3 A total of 57 car parking spaces together with provision of cycle spaces are indicated. A total of 12 car spaces are unallocated (resident/visitor). The other 45 car spaces are made up of 34 bays and 11 garages.
- 3.4 The scheme has had a number of changes from the original scheme, both in design, landscaping and mix of housing. The proposals now comprise 2 properties facing towards Littlecote to the north, a terrace of 8 dwellings facing towards the care home, a group of 9 dwellings and 6 flats facing the

turning head at the southern end of the site, together with a block of 3 flats located in the south western corner and a block of 6 flats to the south of the care home on the boundary. The properties range from 2 to 2.5 stories. The flat blocks in the southern part of the site are 2.5 storey.

- 3.5 The development has evolved by seeking to establish a development pattern of strong street frontages to Rotherlea, Littlecote and South Grove with defensible space to the frontage of the properties. Whilst the immediate locality has little architectural identity the scheme has endeavoured to reflect, to an appropriate extent, the existing character of Petworth in terms of built form and materials.
- 3.6 The layout of close terraces has been introduced to establish a robust street elevation with the variation in ridge and eaves heights providing some added character to the massing of the built form. In addition the scheme has endeavoured to allow an enhanced view at the southern end of Rotherlea towards a closed, enlivened frontage formed by the flats and the planting at the centre of the turning area.
- 3.7 The current scheme has endeavoured to establish and connect green links to the surrounding landscape and integrate the existing character into the proposed development by use of meaningful green infrastructure, such as the re-enforcement of large scale woodland margin on the eastern boundary, the inclusion of long gardens for some dwellings, the retention of the western green area, and the avoidance of built development close to the mature trees within the care home boundary. The scheme introduces an amenity area at the southern part of the site facing onto South Grove, whilst also retaining the wildlife pond and green space in the south western corner. This was a particular requirement of the housing allocation of this site within the Neighbourhood Plan and has led to substantial modifications to the scheme to accommodate this.

4. Consultations

4.1 Conservation & Design Team (CDC): Comments on original plans.

- Requirement for S106 contribution towards Public Art (£12,367). (Officer comment: superseded by adoption of CIL).

4.2 Contract Services (Waste): Comments.

- General comments with regard to locations of bins for collection.
- Note that the access would be from the north with a turnaround area made available to the south. This would need to be demonstrated by means of a swept path analysis to confirm refuse freighters can negotiate the turning area unobstructed and safely.
- Concern over location of bins for flats D4-D9. The bin store is rather far from South Grove. Developer to confirm if the freighter is able to reverse up to the bin store and the road is able to take the weight of the 26 tonne vehicle.

4.3 Community Liaison Officer: Comments.

- Note that S106 community facility contributions are no longer applicable for this application but would request a CIL contribution towards community facilities within the Parish.
- Confirmation required as to whether public art is integral to the design.

4.4 Dark Skies Officer: Comments.

- As the development is well within the urban street lit area of Petworth the impact on dark skies should be small provided that a few lighting designs are considered.
- Recommend that if residential road lighting is needed, then low level bollard lighting be considered rather than the similar 5m LED street lights around Petworth. Due to the lower light output they will reduce the probability for pollution and will be sufficient to light any road way. Dark sky friendly bollards (with a zero upward light component) should be used ideally with a colour temperature of around 3000K. Any lighting above 500 lumens would need to be fitted with shielding to prevent upward light spill. Recommend that they are fitted with switching circuits (proximity or timed) to ensure they are not on throughout the night when not needed, e.g. past 12 midnight.

- It is assumed that these houses will come fitted with some form of lighting – which is not detailed. Recommend that dark sky friendly lighting is used and fitted with bulbs of 500 lumens or less, ~3000K. (500 and above require shielding).
- Again suitable proximity sensors should be fitted to ensure no lighting when not needed. Recommend that higher power security style lighting (>1500 lumens) not be used, as the level of light is more than needed. If this style is required, then it must be fitted so that it has zero upward light – as this style of lighting can be quite noticeable and an irritant to neighbours if not installed properly.
- The glazing around the development is fine, as most is shielded from the surrounding houses. Recommend that roof lights be avoided (or converted to dormer style) to prevent upward light.

4.5 **Design Officer: Comments.**

- The scheme integrates well with its surroundings by connecting the site north/south to the existing movement framework and local facilities, whilst also respecting existing buildings and land uses. The design here has carefully considered the three or so frontages (to main streets) and created a pleasant arrangement of dwellings along Rotherlea Road.
- The scheme has used local character and decoration to inform elevation and roofscape details, which creates a welcome variation and visual interest to the proposed street scene along Rotherlea Road.
- The rain garden will provide some amenity value to residents (and people passing through the site), and overtime, it will become a distinctive feature of the site.
- If there were to be any further negotiation, would suggest Unit 32 could be removed. Currently a dual aspect dwelling only set back by 1.5m from Littlecote.
- Would also suggest that the 3m ‘highly visual zone’ could be located along the desire line (the west side) of Rotherlea Road, as could the street tree planting. The junction to the care home car park could be reduced (radius of 1m) to encourage low vehicle speeds having two advantages in improving the pedestrian environment and safety and allowing a garden scale/style tree & hedge planting scheme to properties 24-31.
- The strategic landscape tree planting (green infrastructure) to the eastern (rear garden) boundary is within private ownership. A management plan should be drawn up to consider how they manage and access this planting.
- Concern about natural surveillance to wildlife pond. Some care needed in relation to access, lighting, and boundary treatments.
- Extent of external storage space for bins, recycling and bicycles needs to be clarified.

4.6 **Drainage Officer: No objection subject to conditions.**

4.7 **Ecology/Environment Officer: Comments.**

- Bats – If any of the ivy clad trees are to be removed they should be soft felled, under ecological watching brief. The hedgerows and tree lines are an important link within the wider landscape of bats and should be retained and enhanced with native species. Lighting scheme should take into consideration the presence of bats in the local area and scheme should minimise the potential impact to bats using trees, hedgerows and buildings by unnecessary artificial light spill through the use of directional light sources and shielding.
- Reptiles – Precautionary approach should be taken with regards to vegetation clearance as detailed within the reptile survey (condition suggested).
- Nesting birds – any works to trees or vegetation clearance should only be undertaken outside of the bird breeding season which takes place between 1 March-1 October. If works are required within this time an ecologist will need to check the site before any works take place.
- Enhancements – there are a number which could be made to improve the area including bat boxes on nearby trees, bird boxes on nearby trees, wildflower seed mix use, native planting to

fill gaps in the hedgerows, installation of log/rubble piles. In addition swales/SuD's should link with other water bodies within the wider landscape.

4.8 Environmental Health – Contaminated Land: No additional comments.

4.9 Flood Risk Management (Local Lead Flood Authority): Comments on original plans. (No comments on current plans).

- Surface water, groundwater and ordinary watercourse flood risk: Site appears to be at low risk from surface water flood risk although mapping shows an area of higher risk on the eastern side of the site. No records of historic flood events and this information does not mean the site itself has not flooded in other events in the past or will not do so in the future, only that no records are held that indicate that this is likely. Area of development is shown to be at 'negligible risk' from groundwater flooding, based on current mapping and underlying geology. The potential for ground water and contamination within a source protection zone has not been considered and the LAP should consult with the EA if this is considered to be a risk.
- SuD's: Proposed surface water drainage approach meets the requirements of the NPPF and NPPG. Conditions should be imposed.

4.10 Highways Authority – No objection subject to conditions

- Much of the scheme currently proposed reflects that shown in the previous submission. Those elements of the site accessed from Dawtrey Road and Rothermead for example are unchanged. The access arrangements for those dwellings served from South Grove also are unchanged. The internal layout of this part of the site has been altered but the number of dwellings and parking spaces remains unchanged. In highway terms, WSCC are satisfied that the proposed development would not result in any unacceptable highway safety issues or any other such issues that might be considered severe.
- Conditions suggested previously remain applicable.

4.11 Landscape Officer: No objection subject to conditions.

4.12 Petworth Town Council – Objection.

- The proposals in their current form are in conflict with the intentions of the Neighbourhood Plan.
- The site is identified in Table 5.1 with an allocated housing of approximately 23 dwellings. Policy H5 proposed the site should provide at least 23 residential dwellings (28.75dph). The proposal equates to 34 dwellings (42dph). The proposals are therefore not compliant with Policies H5 and ESD2.
- The application proposes a mix of affordable units broadly as set out in table 5.2 however the scheme does not provide any affordable 4 bedroom units and is therefore not compliant with the NP.
- The proposal is compliant with Policy H4 in providing 40% affordable housing.
- Policy H5 (ii) notes that roads through the site should seek to have a design speed of 20mph. Confirmation and suitable conditions should be agreed.
- Policy H5(v) seeks to retain views to the downland landscape. Due to the 3 storey massing at the south, the application is not compliant with the NP.
- Policy H5 (vi) seeks to preserve and enhance the Old School Pond, which is noted, however public access and boundary treatments require clarification. Confirmation and suitable conditions should be agreed.
- Policy H5 (vii) requires an extended Phase 1 Ecology Survey to be provided. This should be less than 3 years old and confirmation/suitable conditions should be agreed.
- Bulk scale and massing of 3 storey buildings to the south is out of character with the adjacent 2 storey housing contrary to Policy ESD1. The site plan at the south relates poorly to the buildings in South Grove and does little to contribute to the built form and open space in South Grove. This arrangement eradicates views from the site towards the downland

landscape and is noted as having a major effect with adverse effect on this view point in the LVIA.

- Plots D23 to D32 would have an overbearing presence of continuous building on the street scene. Form of development excludes opportunities to view green spaces around the site between the proposed dwellings. Little articulation in the façade of these plots.
- Architectural reference to the town centre built form is not particularly relevant in this location some distance from the town, where the nature of the existing buildings are that they are set back from the street with clear spaces between buildings. Application is therefore not compliant with Policy ESD1.
- The massing is excessive and along with the GA Policy concerns below, demonstrates that the density is not satisfactorily achievable on the site. Therefore the scheme does not comply with Policy ESD2.
- The Design and Access Statement does not provide a design narrative explaining how the site arrangement has been developed with consideration to the site constraints, wider urban context and countryside. Scheme therefore is not compliant with Policy ESD3.
- Inclusion of the Old School Pond is welcomed in accord with Policies ESD4 and ESD5.
- The LVIA refers to a superseded plan and the current plan would be more damaging towards the downland.
- The Phase I habitat survey should be updated. All trees are to be removed. Measures to mitigate the loss of this planting needs to be clarified. Application is not compliant with ESD7.
- The application proposes a code for sustainable homes level 3 may be achieved but does not commit to further sustainable building practices (ESD8).
- Policy GA1 would generate a need for 68.5 on site parking spaces for 34 dwellings. The scheme proposes 57 spaces of which 8 are located outside the boundary. The application does not address displacement of the parking spaces lost due to the development. The application does not address the additional impact on the existing streets, estate access and parking demand. The scheme is not compliant with Policy GA1.
- The cycle and pedestrian link is acknowledged and welcomed, however the quality and appropriateness of the connection to South Grove and the wider context in view of the allocated sites is questioned.

4.13 South Downs Society: No comments received in relation to current plans but some comments on original plans expressing some concern about lack of parking provision and number of mature trees to be removed.

4.14 Southern Water: Suggest informatives.

4.15 Tree Officer: Comments.

- The Lombardy poplar trees were the most significant trees on the site and were of high amenity not only on the site but within the locality of the area (southern side of Petworth). Also their status from the original proposal in 2013 which were graded as A's but now have been downgraded to C2's. Possibly due to their size and impact within the setting and proposed layout.
- They are mature trees but are brittle wooded species and works apart from some thinning would be of significant amount and the trees as they are so tall may be considered disproportionate within the setting and proposed layout.
- Also, when reviewing the site in 2013, the vegetation on the eastern and southern boundaries surrounding the site were substantial but it seems from the 2015 application that this vegetation is shown to be removed and replaced.
- The rest of the trees are less significant, due to their small size, some of the species are short lived or in poor health and the majority have no major visible defects, could be sustainable but have an impact on the proposal. It seems all the trees on the site are going to be felled.

- There is significant planting plan/proposal, some large trees, according to planting plans within and around the site to limit the loss of the original trees and to enhance the site. Due to the potential loss of vegetation around the site this could be considered a good solution/compromise.

5. Representations

5.1 1 letter of objection to current plans

- Significant issues with parking in the area, increased use of the school site have resulted in staff not being able to park on site and therefore using South Grove.
- Proposals show 58 parking spaces of which 8 are outside the boundary. Policy EA1 of the neighbourhood plan requires 68.5 parking spaces.
- Parking issues within South Grove together with removal of pavement to create an access road into the development will create an additional safety issue, requiring children and parents to cross another road to access the school site.
- Whilst it is accepted that the site will be developed at some point, it seems reasonable to suggest that this occurs after a new proposed access to the school is built and a condition made that deliveries are not allowed between school pick up and drop off times to minimise the risk of accidents.
- The proposals have failed to address the inadequacy of the existing road access to the school. The roundabout between Dawtrey Road and the A285 has poor visibility. Further housing is likely to increase the risk of an accident. Concerns also about impact of construction traffic on parked cars.
- Flat development facing South Grove is out of scale and keeping. Would dwarf existing developments of both Wyndham Road and South Grove (contrary to Policy PP2).
- Significant overlooking to the end of Wyndham Road Terrace and the nearest South Grove properties as well as the School Caretakers house.
- Housing density far in excess of suggested range of 25-35 dwellings per hectare. Moving the larger buildings towards the middle of the site would also lessen impact.
- Ecological concerns: Reptile surveys carried out at periods that Natural England suggest should be avoided. Badgers have been observed using the site. Ecology report fails to discuss the impact of the development on the Community Pond. Hedgehogs have been observed crossing into and from this area.
- Further residential development feeding into already overloaded drains will make flooding in surrounding roads worse.
- Applicant has failed to engage with the neighbourhood plan.
- Affordable house shown in only one location. Should be mixed.
- Given the type of housing will be targeted at older couples it is more appropriate that small houses rather than flats be provided.

5.2 11 Letters of objection on first set of amended plans which were received which covered some of the issues outlined above, whilst also the following concerns

- Provision of garages is misleading as these tend to be used for storage. Insufficient parking.
- Access problems for emergency vehicles.
- Loss of trees and natural environment.
- Lack of a turning head will also mean vehicles will have to reverse out of the road onto South Grove.
- Further development feeding into already overloaded drains will make situation worse.
- Noise levels by increased traffic will impact on residents in South Grove and Wyndham Road.

- The access onto South Grove does not appear to be wide enough to fit two way traffic through at one time.

5.3 10 letters of objection on original plans which covered some of the issues outlined above, whilst also the following concerns

- Parking and highway safety concerns.
- Lack of infrastructure in Petworth to deal with new development.
- High density, overdeveloped with little amenity land, poor space standards and small back gardens.
- Will impede and shadow the south facing views of the elderly Rotherlea residents.
- Arches out of keeping with the existing area.

6. Planning Policy Context

6.1 Applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. The relevant statutory development plan comprises the saved policies of the **Chichester District Local Plan: (1999), and the Petworth Neighbourhood Plan**. The relevant policies are set out in section 7 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.

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

National Planning Policy Framework and Circular 2010

6.3 The National Planning Policy Framework (2018) is considered holistically although the following sections are of particular relevance to the applications:

- Section 2: Achieving sustainable development
- Section 5: Delivering a sufficient supply of homes
- Section 6: Building a strong, competitive economy
- Section 11: Making effective use of land
- Section 12: Achieving well-designed places
- Section 15: Conserving and enhancing the natural environment
- Section 16: Conserving and enhancing the historic environment

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 revised National Planning Policy Framework (NPPF) issued on 24 July 2018. The Circular and NPPF confirm that National Parks have the highest status of protection, and the NPPF states at paragraph 172 that great weight should be given to conserving and enhancing landscape and scenic beauty in national parks and that the conservation and enhancement of wildlife and cultural heritage are also important considerations and should be given great weight in National Parks.

6.5 The development plan policies listed in Section 7 have been assessed for their compliance with the NPPF and are considered to be compliant with it.

Major Development

6.6 Officers are of the view that the proposal does not constitute major development for the purposes of paragraph 172 of the NPPF (2018), and accompanying footnote 55, advising that 'major development' in designated landscapes is a matter for the decision maker, taking into account 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.

- 6.7 The development plan policies listed below have been assessed for their compliance with the NPPF and are considered to be compliant with the NPPF.

The South Downs Partnership Management Plan (PMP) 2013

- 6.8 The PMP outlines a vision and long term outcomes for the National Park, as well as 5 year policies and a continually updated Delivery Framework. It is a material consideration in planning applications. The following policies are relevant: 1, 3, 39, 40, 43, 48, 50.
- 6.9 The development plan policies listed below have been assessed for their compliance with the NPPF and are considered to be compliant with it.

7. Planning Policy

- 7.1 The relevant saved policies in the **Chichester District Local Plan (1999)** are:

- BE1: Settlement policy areas
- BE11: New development
- BE13: Town cramming
- BE14: Wildlife habitat, trees, hedges and other landscape features
- BE16: Energy conservation
- TR6: Highway safety
- TR8: Catering for cyclists and pedestrians
- H1: Dwelling Requirement
- H4: Size and density of dwellings
- H5: Open space requirements
- H8: Social and low cost housing in settlement policy areas

- 7.2 The relevant policies in the **Petworth Neighbourhood Development Plan** are:

- PPI: Settlement Boundary
- PP2: Core Planning Principles
- H1: Allocate land for approximately 150 new homes
- H3: Housing Type and Mix
- H4: Affordable Housing Provision
- H5: Rotherlea
- ESD1: Character and Design
- ESD2: Housing Density
- ESD4: Preserving Local Green Spaces
- ESD5: Public Open Spaces
- ESD6: Landscape and Visual Impact
- ESD7: Biodiversity and Trees
- ESD8: Sustainable Design
- GA1: Parking Requirements
- GA2: Pedestrian and cycle movement
- DI: Infrastructure Delivery

The South Downs Local Plan Submission (2018)

- 7.3 The South Downs Local Plan: Pre-Submission Local Plan was published under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 for public consultation between 26 September to 21 November 2017, and the responses considered by the Authority. The Plan was submitted to the Secretary of State for independent examination in April 2018. The Submission version of the Local Plan consists of the Pre-Submission Plan and the Schedule of Proposed Changes. It is a material consideration in the assessment of this planning application in accordance with paragraph 48 of the NPPF, which confirms that weight may be given to policies in emerging plans following publication. Based on the current stage of preparation, and given the relative age of the saved policies within the Chichester District Local Plan (1999) the policies within the Submission South Downs Local Plan (2018) are currently afforded considerable weight, depending on the level of objection received on individual policies. The relevant policies are:

- SD1: Sustainable Development

- SD2: Ecosystems Services
- SD4: Landscape Character
- SD5: Design
- SD7: Relative Tranquillity
- SD8: Dark Night Skies
- SD9: Biodiversity and Geodiversity
- SD11: Trees, Woodland and Hedgerows
- SD19: Transport and Accessibility
- SD20: Walking, Cycling and Equestrian Routes
- SD21: Public Realm, Highways Design and Public Art
- SD22: Parking Provision
- SD25: Development Strategy
- SD26: Supply of Homes
- SD27: Mix of Homes
- SD28: Affordable Housing
- SD46: Provision and Protection of Open Space
- SD48: Climate Change and Sustainable Use of Resources
- SD49: Flood Risk Management
- SD50: Sustainable Drainage Systems
- SD51: Renewable Energy
- SD54: Pollution and Air Quality
- SD55: Contaminated Land

8. Planning Assessment

Principle of development

- 8.1 With regard to the principle of development it is considered that residential development on the land is acceptable subject to compliance with other policies and material considerations.
- 8.2 The land falls within the residential settlement of Petworth as set out in the Chichester District Local Plan. The principle of residential development has already been established in earlier approvals for schemes and the site is allocated specifically in the made Petworth Neighbourhood Plan.
- 8.3 Broad compliance with policy in relation to the specifics of the scheme are considered in more detail below, with specific consideration to the requirements of the Petworth Neighbourhood Plan (Policy H5).
- 8.4 Policy H5 allocates the application site for *at least 23* residential dwellings. The proposals, whilst they provide in excess of the lesser number prescribed, do not conflict with the exact wording of the Policy. The explanatory text appears to raise concern in relation to increased density of development within the site and Para 5.26 actually states that *'the most appropriate capacity of the site is considered locally to be 23 dwellings (30 dwellings per hectare).'*
- 8.5 Whilst the apparent aspiration towards a lower density within the Neighbourhood Plan is noted the primary driving force in consideration of a scheme should be whether the resultant density appears in keeping with the general character of the area or the result of such density would appear at conflict with the surrounding character. A number of matters can affect this and is not limited to the built form, but can include the parking provision, the extent of land available for landscaping within the site, and also the provision of private and public garden areas. This is considered in more detail when looking at the design and landscaping of the scheme. Notwithstanding, as a starting point it is not considered that the proposal is at odds with the first part of Policy H5 per se.
- 8.6 Policy H5 has a number of criteria which development of the site should incorporate. These are explored here in more detail
- 8.7 (i) *Provide vehicular access from Dawtrey Road and ensure vehicular access to the Square Field Site is not prejudiced.* Vehicular access is provided for the main part of the site from Dawtrey Road with only nine properties accessing the site from South Grove. In addition, there is no vehicular access

allowed through the site from Littlecote to South Grove. Vehicular access to the Square Field site would not be prejudiced by this development.

- 8.8 *(ii) Roads through the site should seek to have a design speed of 20mph.* This would be a matter for the Highways Authority to decide. It is however important to note that the design of the scheme is such that the speed of vehicles within the development would be restricted, given the short length of road along Rotherlea from north to south, with the turning area at the southern end.
- 8.9 *(iii) Make equal provision on the sites northern edge for any existing on street car parking spaces within Dawtrey Road that are lost as a result of any development on that site.* The proposals make provision for some parking spaces within Dawtrey Road/Littlecote to replicate those which currently exist. It is noted that the existing hammerhead turning area at the eastern edge of Littlecote would be lost and that this currently is used for additional parking, however this is not a designated parking space and it would be unreasonable to expect additional parking to be provided in replacement of this. The provision within the plans is therefore considered to be suitable in this respect.
- 8.10 *(iv) Seek to enhance amenity and ecology through protecting and maintaining existing green corridors and through the creation of new green infrastructure and green corridors which also provide sustainable drainage wherever possible.* The layout of the development has retained provision for wildlife corridors along the south and eastern boundaries. This is considered to be an acceptable element in complying with this part of the Policy.
- 8.11 *(v) Seek to retain views towards the downland landscape.* The current lack of development on the site naturally offers views from Littlecote and Dawtrey Road, through the trees which form the southern boundary beyond South Grove and towards the downlands to the south. Inevitably, some of this view would be obscured by the development along the southern boundary although block D4-D9 would be set back tight against the boundary with the Care Home to the north, thus offering views across towards the downlands.
- 8.12 *(vi) Preserve and integrate the Old School Pond within the site's public open space provision. The biodiversity value of the pond must be safeguarded and where possible enhanced.* The original scheme did not include the retention of the Old School Pond. Subsequent negotiations and discussions however have resulted in the incorporation of the green space at the south western corner of the site and the retention of the Old School Pond. This alteration was specifically to address the detailed comments associated with the Neighbourhood Plan.
- 8.13 *Development proposals must be accompanied by an Extended Phase 1 ecological survey covering the Old School Pond.* The application has included the submission of a recent reptile survey for the whole site which incorporates the Old School Pond.
- 8.14 In conclusion therefore the scheme is considered to be in general accord with the requirements of Policy H5 of the Neighbourhood Plan and the general principle of development as set out in the proposals is considered to be acceptable.

Affordable Housing and Mix of Housing

- 8.15 Policy H8 of the Chichester Local Plan requires a provision of appropriate affordable housing (which was followed by the interim statement in 2007 setting the required level at 40%). This is echoed in Policy H4 of the Neighbourhood Plan. The application provides 13 out of the 34 properties for social rented housing which equates to just over 38% affordable housing. Whilst this is marginally under the required amount, the applicant has expressed a willingness to make a financial contribution for the remainder in order to meet the requirements of Policy H8. This is considered to be an acceptable provision which would be secured by way of a Section 106 Agreement. It is also considered that the affordable housing provision is sufficiently split up throughout the site as to be acceptable and no objection has been raised by the Housing Team in this respect.
- 8.16 The applicants have amended their scheme during the process and it is now considered to include an appropriate mix of properties to meet local housing need as confirmed by the Housing team at Chichester District Council. Policy H3 of the Neighbourhood Plan provides a Table (5.2) setting out an indicative mix of house types, in both the market element and affordable element. The proposed scheme is relatively close to the indicative mix and is considered to be acceptable in relation to Policy H3. (Required percentage of 1 & 2 bed market properties 40% - Actual 39%. Required percentage of 3 bed market properties 40% - Actual 19%. Required percentage of 4 bed

market properties 20% - Actual 9%. Required percentage of 1 bed affordable housing 35% - Actual 30%. Required percentage of 2 bed affordable housing 35% - Actual 38%. Required percentage of 3 bed properties 25% - Actual 30%. Required percentage of 4 bed properties 5% - Actual 0%). Whilst the required provision of 4 bed houses is not met (either in relation to market or affordable dwellings) it is difficult to achieve an exact match of the requirements of the policy in a scheme of this size. In addition, the general character of the development is predominantly smaller properties and flats and the introduction of an element of 4 bedroom properties might appear at odds with the generally smaller scale houses within the site. On this basis, it is considered that the mix of housing is acceptable, albeit not entirely in accord with Policy H3 of the Neighbourhood Plan.

Design, Layout and Landscaping

- 8.17 The rationale for the design approach has been set out earlier in the report, together with how the proposal accords generally with the requirements set out in the Neighbourhood Plan.
- 8.18 The scheme has been subject to consideration at the Design Review Panel and subsequent workshops in order to arrive at the scheme presented to members now. It is considered that the scheme responds well to the character of the surrounding area with appropriate landscaping on the edges and within the site. The scheme allows for pedestrian permeability through from Rotherlea to South Grove and responds well to the character of surrounding roads whilst raising design quality.
- 8.19 Concerns have been raised previously and with the current plans concerning the introduction of 3 storey buildings to the south (essentially the buildings are 2.5 storey, being 2 storey but with rooms in the roof). Whilst it is noted that the properties in South Grove are 2 storey it is not considered that the introduction of 2.5 storey buildings would appear either overbearing or out of keeping. The surrounding area (including to the north of Dawtrey Road) have examples of 3 storey buildings and it is considered that the introduction of taller buildings would not appear out of keeping in this location. Nor is it considered that these buildings would dwarf the existing properties in South Grove.
- 8.20 The scheme also provides a landscaped rain garden within the turning head centrally in the southern part of the site and includes an amenity area opposite South Grove to the front of Units D4-D9. The recent inclusion of a community pond to the eastern part of this amenity area is considered to be a positive addition to the scheme.
- 8.21 The proposals include the removal of the existing trees and vegetation along the eastern and southern boundaries and replacement with new planting along both boundaries. This is considered acceptable and will ensure a continued wildlife corridor through the site. Given that the boundary treatment on the eastern boundary would be predominantly within the residential curtilage of properties, it is important to secure a management plan that ensures the long term retention of the boundary planting. It is considered important that this be secured through a section 106 Agreement which sets out a landscape management regime.

Access and Parking Arrangements

- 8.22 The application has been considered fully by the Highways Authority who raise no objection to the scheme subject to conditions in relation to provision of parking, cycle parking etc. Whilst concerns have been raised about parking provision not according with Policy GAI of the Neighbourhood Plan this has been given due consideration by the Highways Officer. The allocated parking is considered to be sufficient and can be conditioned appropriately to ensure its retention.
- 8.23 The concerns raised about parking issues and safety in relation to vehicular traffic are noted and have been discussed with the Highways Authority. It is appreciated that South Grove can become busy at times however this is arguably predominantly during school opening and closing times during the day, when there tends to be less vehicular activity to and from residential properties. It is not considered that the location of residential development with limited access onto South Grove (Plots D1-D9) will have such an impact on the existing situation as to justify refusal on this basis.

Ecology

- 8.24 The application has been subject to scrutiny by the Ecologist and is considered to be acceptable subject to the imposition of conditions. The current plans include the retention of the Old School Pond which is welcomed and in accord with Policy H5 of the Neighbourhood Plan.

Impact on amenity of existing residents

- 8.25 The site is currently vacant and therefore any residential development will inherently have some impact on the amenity currently enjoyed by neighbouring residential properties. The properties fronting onto Littlecote would have a traditional and acceptable street frontage relationship with the properties opposite with suitable distances between the properties. Likewise the properties facing opposite the existing Care Home would be separated by the road at an acceptable distance as to not affect amenity currently enjoyed.
- 8.26 The building incorporating units D1-D3 would be separated from properties in Wyndham Road by the retention of the Old School Pond thus offering suitable distance as to not affect amenity, which is considered to be acceptable. Properties D4-D9 would be set back from the boundary with South Grove as to not to have an impact on amenity of properties. Whilst this block of properties would be tight to the northern boundary with the care home, they would look across the car park, thus not resulting in overlooking to the care home.
- 8.27 Flats D10-15 would look across to the rear garden of 16 South Grove. Ordinarily, the introduction of a 2.5 storey building with a large number of new windows at first and second floor level might be considered to raise issues in terms of overlook to the rear garden of this property. However, it must be noted that this property has had an open low level chain link fence along this boundary for some considerable time, during which the garden has had very little in way of privacy, especially given the activity along this road to the Primary school and the Herbert Shiner Centre. In the circumstances, it is not considered that the development will impact unacceptably on the amenity currently enjoyed by this residential property.

Impact on Trees

- 8.28 None of the trees within the site are the subject of a tree preservation order and the majority of trees are scheduled to be removed as part of the development. The majority of trees are considered to be of low arboricultural and landscape value. The scheme involves significant replanting along the eastern and southern boundaries.
- 8.29 It is considered that the large mature Lombardy poplar group along the southern boundary would be inappropriate for retention due to their large size and short estimated remaining lifespan. The development of the site allows for the establishment of a new group of trees and hedgerow along these boundaries.
- 8.30 Although it is acknowledged that a number of trees and woody shrubs will require removal to facilitate the development, their loss would not be detrimental to the wider landscape or have an adverse impact on local visual amenity, especially given that the scheme includes a comprehensive replanting scheme with appropriate species.

Drainage

- 8.31 The scheme has been subject to scrutiny by the Drainage Officer, the Lead Flood Authority and Southern Water, none of whom have raised an objection to the application subject to conditions.
- Southern Water after Initial investigations have indicated there is insufficient information to confirm if surface water capacity is available to serve the proposed development and further investigation of downstream network will be required to assess capacity. They confirm that surface water should be disposed of using alternative means such as soakaways or any local drainage watercourses, subject to all interested parties approval. It is considered that these matters can be addressed by way of imposition of suitable conditions.

9. Conclusion

- 9.1 The proposed scheme has been the subject of a significant number of amendments since its original submission in 2015. The scheme now for consideration is considered broadly to be in accordance with the Policies and aspirations of the Petworth Neighbourhood Plan and the Saved Policies of the Chichester District Local Plan. It is also considered to broadly accord with the Emerging Policies of

the South Downs Local Plan. It is considered to be a sensitively designed scheme which responds well to the character of the surrounding locality whilst improving the quality of design locally. The loss of existing trees is considered on balance to be acceptable, given the proposed replanting scheme which will ensure a long term improvement in the landscape character of the area.

- 9.2 The scale and density of the development is considered to be acceptable and would preserve the setting and landscape character of the National Park as well as its special characteristics. The development would not impact adversely on the amenities of occupiers of neighbouring buildings and is considered to be acceptable in terms of impacts such as access, highway safety and parking provision.
- 9.3 Having regard to the above and having taken into account all relevant material considerations, it is concluded that the proposed development is in conformity with the provisions of the Neighbourhood Plan, Saved policies of the Local Plan, the emerging Local Plan and the National Planning Policy Framework and permission is therefore recommended.

10. Reason for Recommendation

10.1 It is recommended that planning permission be granted subject to the completion of a Section 106 Agreement with obligations relating to:

- The provision of 13 dwellings (38% on site for affordable housing).
- An off-site contribution of £79,800 towards affordable housing.
- A management plan securing the long term retention and management of the approved landscape details for the site.

and that authority be delegated to the Director of Planning to refuse the application, with appropriate reasons if the S106 Agreement is not substantially completed or substantial progress made within 3 months of the 8 November 2018 Planning Committee,

and subject to the following conditions:

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).

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.

3. No development above slab level shall commence unless and until a schedule of materials and samples of such materials and finishes and colours to be used for external walls, doors, windows, rainwater goods and roofs of the proposed building(s), surfacing and boundary treatments have been submitted to and approved in writing by the Local Planning Authority. All materials used shall conform to those approved.

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, in accordance with the Petworth Neighbourhood Plan, the Saved Policies of the Chichester District Local Plan, the emerging policies of the South Downs Local Plan Submission (2018) and the NPPF.

4. No development above slab level shall commence until a further detailed Scheme of Soft and Hard Landscape Works has been submitted to and approved in writing by the Local Planning Authority. These details shall include:

- i) Written specifications (including cultivation and other operations associated with plant and grass establishment);
- ii) Planting methods, tree pits & guying methods (including particular sizes for each grade of tree to be used within the hard and soft landscape areas.;

- iii) Schedules of plants and trees, noting species, planting sizes and proposed numbers/densities where appropriate;
- iv) A detailed landscape strategy and layout for the rain garden in the centre of the application site.
- v) Details of location of services throughout the site;
- vi) Retained areas of grassland cover, scrub, hedgerow, trees and woodland;
- vii) Details of the proposed community pond, including levels, plants, enclosure etc;
- viii) A schedule of landscape maintenance for a minimum period of 5 years include details of the arrangements for its implementation;
- ix) Details of all hard-surfaces, such as paths, kerbs, edges, drainage channels and falls, access ways, seating areas, and parking spaces and roads including their appearance, levels, depth and permeability;
- x) Means of all boundary treatments to enclose individual property curtilages visible in the public realm including walls, fences, gates, entrances railings and planting;
- xi) Details of all street furniture including bollards, lighting, signage, cycle racks, tree guards and litter bins.
- xii) A timetable for implementation of the soft and hard landscaping works.

The scheme of Soft and Hard Landscaping Works shall be implemented in accordance with the approved timetable. Any plant which dies, becomes diseased or is removed within the first five years of planting, shall be replaced with another of similar type and size, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To achieve an appropriate landscaping scheme to integrate the development into the landscape and mitigate any impact upon the amenities of neighbouring properties, in accordance with the Petworth Neighbourhood Plan, the Saved Policies of the Chichester District Local Plan (1999), the Emerging South Downs Local Plan Submission (2018) and the NPPF.

5. No development above slab level shall commence until a landscape management plan, including long term objectives, management responsibilities and maintenance schedules for all landscape areas, other than privately owned domestic gardens, shall be submitted to and approved in writing by the Local Planning Authority. The landscape management plan shall be carried out as approved.

Reasons: In the interests of amenity and the environment of the development, in accordance with the Petworth Neighbourhood Plan, the Saved Policies of the Chichester District Local Plan (1999), the Emerging South Downs Local Plan Submission (2018) and the NPPF.

6. No development above slab level shall commence until details of all external lighting to be installed at the site shall be submitted to, and approved in writing by the Local Planning Authority. The lighting shall be installed, maintained and operated in accordance with the approved details unless otherwise approved in writing by the Local Planning Authority.

Reason: To protect the amenity of future residents, create an appropriate public realm, and conserve dark night skies of the South Downs National Park, in accordance with National Park Purposes and the NPPF.

7. Development shall not commence, nor any equipment, materials or machinery be brought onto the site for the purposes of development until details of tree protection measures have been submitted to the Local Planning Authority for approval. Development shall proceed strictly in accordance with the approved details thereafter until the development is completed.

Reason: In order to protect trees which contribute the character of the area, in accordance with the Petworth Neighbourhood Plan, the Saved Policies of the Chichester District Local Plan (1999), the Emerging South Downs Local Plan Submission (2018) and the NPPF.

8. No development shall take place, including any works of demolition, until a Construction Management Plan has been submitted to and approved in writing by the Local Planning

Authority. Thereafter the approved Plan shall be implemented and adhered to throughout the entire construction period. The Plan shall provide details as appropriate but not necessarily be restricted to the following matters:

- the anticipated number, frequency and types of vehicles used during construction,
- the method of access and routing of vehicles during construction,
- the parking of vehicles by site operatives and visitors,
- the loading and unloading of plant, materials and waste,
- the storage of plant and materials used in construction of the development,
- the erection and maintenance of security hoarding,
- the provision of wheel washing facilities and other works required to mitigate the impact of construction upon the public highway (including the provision of temporary Traffic Regulation Orders),
- details of public engagement both prior to and during construction works.

Reason: In the interests of highway safety and the amenities of the area, in accordance with the Petworth Neighbourhood Plan, the Saved Policies of the Chichester District Local Plan (1999), the Emerging South Downs Local Plan Submission (2018) and the NPPF.

9. No development shall commence until details of the proposed surface water drainage scheme have been submitted to, and approved in writing by the Local Planning Authority. The design should follow the hierarchy of preference for different types of surface water drainage disposal systems as set out in Approved document H of the Building Regulations and the SUDS Manual produced by CIRIA. Winter groundwater monitoring, to establish the highest annual ground water levels and Percolation Testing to BRE365, or similar approved method, will be required to support the design of any infiltration drainage. No building shall be occupied until the complete surface water drainage system serving the buildings has been implemented in accordance with the agreed details.

Reason: To ensure development is carried out in a satisfactory manner.

10. Development shall not commence until full details of the maintenance and management of the SUDs system is set out in a site specific maintenance manual and submitted to and approved in writing by the Local Planning Authority. The manual shall include details of the financial management and arrangements for the replacement of major components at the end of the manufacturers recommended design life. Upon completed construction of the SuDS system, the owner or management company shall strictly adhere to and implement recommendations contained within the manual.

Reason: To ensure development is carried out in a satisfactory manner.

11. Development shall not commence until details of the proposed means of foul and surface water sewerage disposal have been submitted to, and approved in writing, by the Local Planning Authority. Development shall be completed in accordance with the approved details.

Reason: To ensure development is carried out in a satisfactory manner.

12. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2015 (or any Order revoking or re-enacting that Order with or without modification) no development falling within the following Classes of Schedule 2 of the Order shall be carried out without the prior written approval of the South Downs National Park Authority: Classes A, B, C & E.

Reason: To ensure the appearance of the development is satisfactory and complies with the Petworth Neighbourhood Plan, the Saved Policies of the Chichester District Local Plan (1999), the Emerging South Downs Local Plan Pre-submission (2017) and the NPPF.

13. No dwelling shall be first occupied until the car parking serving the respective dwelling has been constructed in accordance with the approved site plan. These spaces shall thereafter be retained at all times for their designated purpose.

Reason: To provide sufficient car-parking space for the residential development.

14. No part of the development shall be first occupied until the road(s), footways, and casual parking areas, (including those lay-by parking spaces on South Grove,) serving the development have been constructed, surfaced and drained in accordance with plans and details to be submitted to and approved by the Local Planning Authority.

Reason: To secure satisfactory standards of access for the proposed development.

15. Development shall only take place in accordance with the recommendations set out in the submitted Reptile Survey 2018 (The Ecology Partnership)

Reason: To protect ecological interests within the site.

16. No development shall commence until a scheme to deal with contamination of land and/or controlled waters has been submitted to and approved in writing by the Local Planning Authority (LPA). Unless the local planning authority dispenses with any such requirement specifically in writing the scheme shall include the following, a Phase 1 report carried out by a competent person to include a desk study, site walkover, production of a site conceptual model and human health and environmental risk assessment, undertaken in accordance with national guidance as set out in DEFRA and the Environment Agency's Model Procedures for the Management of Land Contamination CLR11.

Reason: In the interests of amenity and to protect the health of future occupiers of the site from any possible effects of land contamination in accordance with local and national planning policy.

17. If the Phase 1 report submitted pursuant to Condition 16 above, identifies potential contaminant linkages that require further investigation then no development shall commence until a Phase 2 intrusive investigation report has been submitted to and approved in writing by the LPA detailing all investigative works and sampling on site, together with the results of the analysis, undertaken in accordance with BS 10175:2011+A1:2013 - Investigation of Potentially Contaminated Sites - Code of Practice. The findings shall include a risk assessment for any identified contaminants in line with relevant guidance.

Reason: In the interests of amenity and to protect the health of future occupiers of the site from any possible effects of land contamination in accordance with local and national planning policy.

18. If the Phase 2 report submitted pursuant to Condition 17 above identifies that site remediation is required then no development shall commence until a Remediation Scheme has been submitted to and approved in writing to the Local Planning Authority detailing how the remediation will be undertaken, what methods will be used and what is to be achieved. Any ongoing monitoring shall also be specified. A competent person shall be nominated by the developer to oversee the implementation of the Remediation Scheme. The report shall be undertaken in accordance with national guidance as set out in DEFRA and the Environment Agency's Model Procedures for the Management of Land Contamination CLR11. Thereafter the approved remediation scheme shall be fully implemented in accordance with the approved details.

Reason: In the interests of amenity and to protect the health of future occupiers of the site from any possible effects of land contamination in accordance with local and national planning policy.

Informatives

Nesting Birds

Any works to the trees or vegetation clearance on the site should only be undertaken outside of the bird breeding season which takes place between 1 March – 1 October. If works are required within this time, an ecologist will need to check the site 24 hours prior to any work taking place.

Public Sewerage

A formal application to the public sewerage system is required in order to service this development. Please contact Southern Water, Sparrowgrove House, Sparrowgrove, Otterbourne, Hampshire, SO21 2SW (Tel: 03330 303 0119) or www.southernwater.co.uk

11. Crime and Disorder Implication

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 opportunity to provide additional information to overcome technical issues.

TIM SLANEY

Director of Planning

South Downs National Park Authority

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Appendices I. Site Location Map
SDNPA Legal Services, Director of Planning.

Consultees

Background Documents All planning application plans, supporting documents, consultations and third party responses

<http://planningpublicaccess.southdowns.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=NMWC20TUG9900>

National Planning Policy Framework (2012)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

South Downs National Park Partnership Management Plan 2013

<https://www.southdowns.gov.uk/national-park-authority/our-work/key-documents/partnership-management-plan/>

Chichester District Local Plan 1999

<http://chichester.gov.uk/localplan1999>

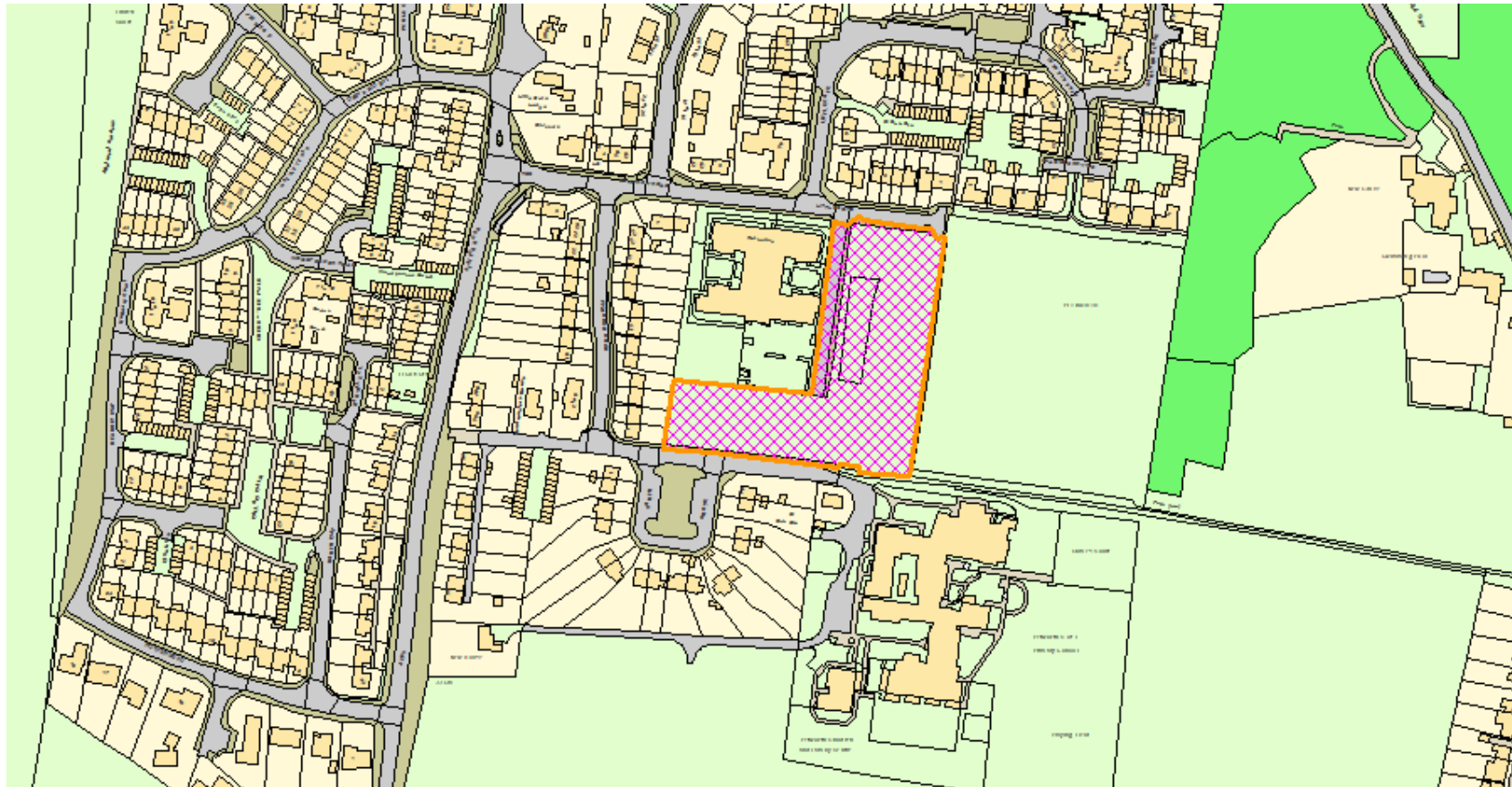
Petworth Neighbourhood Plan

<http://www.petworth-tc.gov.uk/petworth-town-council/neighbourhood-plan/>

South Downs Local Plan Pre-submission (2017)

<https://www.southdowns.gov.uk/planning/national-park-local-plan/>

Site Location Map



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