

Report to	Planning Committee
Date	14 March 2019
By	Director of Planning
Local Authority	SDNPA (Arun District Council)
Application Number	SDNP/18/00023/FUL
Applicant	Mr Steven Williams
Application	Overflow woodland car parking access to the south of the existing car park for additional 35 cars. It includes pedestrian pathways to provide safe and comfortable access to all the parking spaces, and allows for vegetation areas through out to maintain and enhance the character of the woodland.
Address	Chestnut Tree House Childrens Hospice, Dover Lane, Angmering, BN18 9PX

Recommendation: That the application be refused, for the reasons set out at paragraph 10.1 of this report

Executive Summary

The application seeks permission for the provision of a new overflow carpark for 35 cars in an area of woodland that would serve the visitors to and residents of Chestnut Tree House children's hospice.

The submitted information provides clear justification for the need for the car park, and the scheme would accrue a number of benefits that would align with the National Park's duty to seek to foster the economic and social well-being of local communities. Officers fully support the aims and aspirations of Chestnut Tree House in providing a highly sensitive, unique and important service to vulnerable members of the community and their families, and the general principle of provision of additional parking within the wider site is not considered to be unacceptable per se.

However, officers have concerns that have been consistently expressed over the impact of the development in the specific location proposed, which would result in the irreplaceable loss of an area native broadleaf woodland and the loss of amenity as a result of tree removal, which has resulted in a recommendation of refusal. The decision by Members will therefore require consideration of these impacts and whether they could be outweighed by the public benefits that would be accrued.

The application is placed before Members because it raises unique policy considerations.

I. Site Description

- I.1 Chestnut Tree House is a Children's hospice located immediately north of the A27 between Arundel and Patching, to the west of Dover Lane. The site comprises a large building within well-kept grounds bordered by a belt of mature trees and hedging. The site is currently well screened to the South, East and West by mature woodland, with intervening woodland between the site and the A27. The site is visible from the North where there are fields with

interspersed clumps of mature oak trees, and further woodland beyond.

- 1.2 The site is located within the Angmering and Clapham Wooded Downland Estate character area, which is an area of 'enclosed' woodland landscape (some of which is ancient woodland) and an irregular mosaic of arable fields. The site was previously the subject of a forestry Commission Woodland Grant Scheme between 2000-2006, and has recently been donated to the Hospice by the Angmering Park Estate.
- 1.3 The site is accessed from Dover Lane which joins the north bound carriageway of the A27. The main car parking area, consisting of 71 formal parking spaces including 3 disabled and 4 larger van/minibus, is directly to the south of the main building and its point of public access, with an overflow parking area for up to 50-60 spaces currently provided in a field to the east of Dover Lane.

2. Relevant Planning History

- 2.1 The most recent planning history relating to the site is as follows:

SDNP/12/01607/FUL Removal of existing oil tank and replacement with larger oil tank. Approved 26.10.2012

SDNP/13/04141/FUL Proposed development of a tree house with raised platform and woodland walk within grounds of Chestnut Tree House. Approved 28.11.2013

SDNP/14/03294/CND Variation of condition no. 2 to SDNP/13/04141/FUL Approved 29.09.2014

SDNP/14/05318/FUL Two storey extension to the west of the existing hospice along with the reconfiguration of some of the service areas in line with the changing requirements of the hospice. Also a gardeners store in the garden. Approved 23.01.2015

SDNP/14/05614/PRE Overflow Woodland car park for 25 cars. Advice given 18.12.2014

The advice provided stated that given that the parking area would be located in an existing clearing within the wooded area requiring the removal of a small number of saplings and no mature trees, the proposal could be acceptable providing no harm would be caused to wildlife.

SDNP/15/03513/FUL New kitchen garden and greenhouse. Approved 02.08.2016

SDNP/17/00937/FUL Overflow woodland car parking access to the south of the existing car park for additional 54 cars. It includes pedestrian pathways to provide safe and comfortable access to all the parking spaces, and allows for vegetation areas through out to maintain and enhance the character of the woodland. Withdrawn 28.07.2017.

3. Proposal

- 3.1 The current application originally proposed 54 car parking spaces in a larger area of the woodland which fell within close proximity of the mapped Ancient Woodland. Following concerns raised by the County Ecologist, Tree officer and Woodland and Biodiversity officer, the scheme was revised to a total of 35 parking spaces further away from the boundary of the mapped Ancient Woodland.
- 3.2 The submitted information states that the proposal will help to meet the growing need of the children's hospice, which provides a vital service to the wider community, including East and West Sussex and South East Hampshire. The proposal seeks to conserve the woodland landscape by virtue of its location within an area of scattered trees, saplings and clearings of ruderal vegetation and areas of scrub. The proposal will also provide contained access allowing currently inaccessible areas of the woodland to be enjoyed.
- 3.3 Approximately 1,200 sqm of woodland habitat will be lost as a result of the proposal, involving the removal of 58 category C trees. Any that do not directly conflict with the proposals will be coppiced to 500mm high and will re-generate post development. The new parking area falls within the Root Protection Areas (RPAs) of several retained trees and it is proposed to be surfaced with cellular grass infill pavers using a 'no-dig' technology. To minimise soil compaction during construction, the retained trees will be separated from the

working area by protective fencing and ground protection. All electrical conduits will be located beneath the raised walkway to minimise potential tree damage and allow future access. The roadways are proposed to be surfaced with porous mortar bound gravel, and the pathways with mulched rubber. 100mm timber edging is proposed around the edge of the pedestrian path, with the edges between paths and planted and vehicle areas defined by a metallic levelled edging.

3.4 The lighting is proposed to be bollard/ low level lighting incorporated into the fence line of the pedestrian walkway around the proposed new car park area.

3.5 In terms of mitigation, the submitted information states that approximately 1,200 sqm of compensatory woodland and hedgerow planting is proposed along the northern and north western boundaries of the wider site, translocating soil and tree specimens from the proposal site. The condition of the semi-improved grassland is also proposed to be enhanced through wildflower planting.

4. Consultations

4.1 **Angmering Parish Council:** Support.

4.2 **Ecology:** No objection, subject to conditions.

- The sensitivity of creating a surfaced car park in an area of broadleaved woodland within the National Park must be acknowledged.
- There may be alternative sites within the existing amenity grassland where some of the car parking spaces could be located, avoiding impacts on woodland.
- The revised design is located within an area of least valuable ground flora away from mapped ancient woodland habitat, avoiding impacts to mature trees, designated sites and protected species.
- Loss of broadleaf woodland priority habitat loss, which forms part of a wider woodland block including ancient woodland, will occur as a result of the proposals.
- Mitigation and compensation is proposed in the form of protection of the retained habitats, and creation of new woodland, scrub, and wildflower grassland habitat using transplanted flora and trees from the impacted areas.
- Management of the wider site is proposed to improve the biodiversity value of the retained woodland in perpetuity, with reported monitoring.

4.3 **Environmental Health:** No comment.

4.4 **Highways Authority:** No objection.

4.5 **Landscape Officer:** Objection. Comments

- The Landscape Appraisal is insufficient to help guide characteristic interventions at this site.
- The application seeks the provision of a car park within priority woodland habitat adjacent to designated Ancient Semi-Natural Woodland. The mitigation measures proposed are uncharacteristic and do not sufficiently address the harm.
- If the car park could be sited in the area proposed for mitigation, there would be less requirement for any mitigation and irretrievable harm to key habitat avoided.
- The significant harm to woodlands is proposed to be mitigated via the creation of hedgerow and meadow/scrub creation and its design is uncharacteristic.
- The hospice is surrounded by surviving medieval landscape, including areas of woodland; this time-depth is of public benefit as it provides a sense of place, and other benefits including reduction in air pollution and supporting wildlife.
- The woodland proposed to be lost minimises harm from the A27 and this benefit cannot be mitigated for elsewhere on the site.
- Notwithstanding the clear and numerous benefits the hospice delivers, the scheme does not conserve or enhance the landscape in this part of the park.

4.6 **Natural England:** No comment.

4.7 **Tree Officer:** Objection. Comments:

- The development will result in the loss of a significant portion of broadleaf woodland priority habitat.
- Notwithstanding the retention of trees, the site would no longer be a woodland ecosystem as the ground flora and soils would be lost.
- The remaining woodland would be reduced in value, less resilient to storm damage, and harder to manage.
- The proposed hard surfacing design may reduce the risk to retained trees however there is no guarantee such methods will work in practice and there is a lack of independent peer-reviewed research into their efficacy.
- A small woodland plantation is proposed by way of compensation, but this would only go a small way to offset the loss of mature broadleaf woodland and should not be a significant material consideration in determining the application.
- The width of the mitigation belt shown in the supporting arboricultural report is too thin to provide true woodland habitat or be managed as continuous cover woodland in perpetuity.
- Salvage of soils is an experimental approach that has not been successfully achieved in previously monitored attempts to 'translocate' ancient woodland.
- There remain significant concerns about the impact on the woodland and refusal is recommended unless the SDNPA are of the view that these are clearly outweighed by other material considerations.

4.8 **Woodland and Biodiversity Tree Officer:** Objection.

- The site is a priority habitat native broadleaf woodland contiguous with a designated ancient woodland, and forms part of a wider network of highly valuable ancient woodland and priority habitat.
- The modified scale and location of development would unacceptably harm the quality of the priority habitat and the designated Ancient Woodland, and negatively alter the character of the woodland.
- Even if the development is technically achievable in terms of the proposed tree retention, the amount of soil compaction, tree felling and additional tree works required to operate the car park would be harmful.
- The proposed mitigation of approx. 0.2ha of new native broadleaf woodland within the wider site to the north of the hospice would not sufficiently compensate for the loss of habitat.
- The woodland provides significant benefit to patients and their families due to reduction in noise and particulate pollution from the A27, and provides tranquillity to the setting. Removing it will be detrimental to the health and wellbeing of those who visit and work/reside on site.
- There are other as yet not fully considered options that the applicant could pursue for managing the provision of additional parking space.

5. **Representations**

5.1 None have been received.

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 is the saved policies of the Arun District Local Plan (2003). The relevant policies are set out in section 7 below.

National Park Purposes

6.2 The two statutory purposes of the South Downs National Park (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 upon the Local Planning Authority 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 8: Promoting healthy and safe communities;
 - Section 12: Achieving well-designed places;
 - Section 15: Conserving and enhancing the natural 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.

The South Downs National Park Partnership Management Plan 2014-2019

- 6.7 The South Downs National Park Partnership Management Plan (SDPMP) (2014-2019) is a material consideration in the determination of planning applications, as outlined in national planning practice guidance, and has some weight. It outlines a vision and long term outcomes for the National Park. The following policies are relevant:
- 1: conserve and enhance natural beauty and special qualities of the landscape;
 - 3: Protect and enhance tranquillity and dark night skies;
 - 4: Create more, bigger, better-managed and connected areas of habitat;
 - 5: Conserve and enhance populations of priority species;
 - 19: Enhance the landscape, habitat connectivity, carbon storage and flood risk management with woodland creation
 - 20: Raise awareness of inherent values of well-managed woodlands;
 - 29: Enhance the health and wellbeing of residents;
 - 39: Manage vehicle parking to reduce impact of traffic and parking on the local area.

7. Planning Policy

- 7.1 The following saved policies of the Arun District Local Plan (2003) are relevant:
- AREA9: Area of Outstanding National Beauty
 - GEN3: Protection of the Countryside
 - GEN7: The Form of New Development
 - GEN9: Foul and Surface Water Drainage
 - GEN12: Parking in New Development
 - GEN15: Cycling and Walking
 - GEN28: Trees and Woodland
 - GEN29: Nature Conservation
 - GEN32: Noise Pollution

- GEN33: Light Pollution
- GEN34: Air Pollution

The South Downs National Park Local Plan Submission (2018)

7.2 The Pre-Submission version of the South Downs Local Plan (SDLP) 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. The Local Plan process is in its final stage before adoption with consultation on relatively minor Main Modifications from 1 February 2019 to 28 March 2019. Based on the very advanced stage of the examination the draft policies of the South Downs Local Plan can be afforded significant weight.

7.3 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
- SD22 – Parking Provision
- SD45 – Green Infrastructure
- SD48 – Climate Change and Sustainable Use of Resources
- SD50 – Sustainable Drainage Systems
- SD54 – Pollution and Air Quality

8. Planning Assessment

8.1 The main considerations to be determined as part of this application are:

- Principle of development;
- Impact on trees, ecology and woodland habitat;
- Design and Landscape;
- Amenity and public health.

Principle of development

8.2 The primary statutory purpose of the South Downs National Park Authority (SDNPA) is to conserve and enhance the natural beauty, wildlife and cultural heritage of the Park. Policy 1 of the South Downs Partnership Management Plan 2014 requires development 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.

8.3 Saved Policy AREA9 ‘Area of Outstanding Natural Beauty’ of the Arun District Local Plan (2003) states that development would not be permitted unless it could be justified as essential for community needs, and demonstrably not harmful to the visual quality and characteristics of the area. Emerging policy SD1 states that permission will be refused where development proposals fail to conserve the landscape, natural beauty, wildlife and cultural heritage of the National Park unless, exceptionally, the benefits of the proposals demonstrably outweigh the great weight to be attached to those interests. Emerging policy SD43 ‘New and Existing Community Facilities’ of the South Downs Submission Local Plan (2018) supports development proposals for new and/or expanded community facility infrastructure where these demonstrate a local need and the scale of the proposed infrastructure is proportionate to the local area.

- 8.4 Paragraph 92 of the NPPF (2018) 'Promoting Healthy Communities' supports development that services community needs and plans positively for the provision and use of community and other local services to enhance the sustainability of communities and residential environments.
- 8.5 The submitted information states that the hospice opened in 2003, when it catered for up to 30 children, and following expansion it now provides care for up to 300 children, hence the increase in parking requirements. The existing overflow car park is located in a field to the East of Dover Lane on land owned by the Angmering Park Estate. The existing arrangement is unlit, susceptible to flooding and does not provide suitable and safe access for children, wheelchair users or those with disabilities. Aside from everyday visitor use, there are additional recurrent events requiring use of a parking area, including:
- 18 training days per annum for up to 30 individuals/vehicles;
 - Monthly fundraising tours involving 10-12 vehicles;
 - Corporate volunteer groups on Thursdays involving 15+ vehicles;
 - An additional 6+ vehicles for drop off and pick up each day during school holidays;
 - Open weekends – 1,000 people attended the last open weekend which is held on a Friday and Saturday, with vehicles queuing on the A27 to gain access to the site;
 - Sponsor visits several times a year, which renders the main carpark closed for the day;
 - The pre-Christmas Teddy Bear run;
 - Chestnut to Paris rally events involving 40 vehicles plus attendant stands and displays.
- 8.6 The information also states that there is limited public transport with the closest bus stops at Poling Corner and Chantry Field Road for bus routes 670 or 9. Both stops are over 15 minutes walking distance from the hospice for a person with no mobility restrictions and there is no signage or a proper public foot path.
- 8.7 In summary, whilst the need for additional parking is clearly demonstrated, and the provision of a further formal parking area is acceptable in principle, the overall acceptability of the scheme hinges on consideration of any impact on trees and woodland habitat, landscape character and amenity, and whether this impact is outweighed by the public benefits that would be accrued. These matters are considered in more detail below.

Impact on Trees, Ecology and Woodland Habitat

- 8.8 Saved policy GEN28 seeks to limit development that would impact protected trees or ancient woodland. Saved policy GEN29 states that development will only be permitted on sites containing semi-natural habitats, features of nature conservation interest or within wildlife corridors where these can be largely retained and sympathetically incorporated, or off-set via a legal agreement. Policy SD9 supports proposals that conserve and enhance biodiversity, giving particular regard to ecological networks and areas with high potential for priority habitat restoration or creation, and should retain, protect and enhance features of biodiversity and supporting habitat and ensure appropriate and long-term management of those features. Proposals should also contribute to the restoration and enhancement of existing habitats and seek to eradicate or control any invasive non-native species present on site. Policy SD11 supports development that will conserve and enhance trees, hedgerows and woodlands, and the felling of protected trees, groups of trees or woodland will only be permitted in exceptional circumstances and in accordance with the relevant legislation, policy and good practice recommendations.
- 8.9 Part 15 of the NPPF (2018) draws attention to the duty to protect the natural environment and to the opportunities for its enhancement. Paragraph 170 states that when determining planning applications, local planning authorities should protect and enhance valued landscapes, sites of biodiversity value and soils; and recognise the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of trees and woodland. Paragraph 175 states that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons, and a suitable compensation strategy exists. Wholly exceptional

reasons are defined as infrastructure projects, where the public benefit would clearly outweigh the loss or deterioration of habitat.

- 8.10 Concerns were raised by officers in regard to the original proposal for 54 car parking spaces in a larger area of the woodland which fell within close proximity of the mapped Ancient Woodland. The Case Officer, Development Manager and Woodland and Biodiversity Officer met with the applicant and agent on site in July 2018 to discuss the concerns raised, and offered the view that given the overriding constraints of the proposal site, there were likely to be other less constrained locations within the wider site to the north of the main hospice building, which could perhaps be used for staff parking to alleviate pressure on the main car park. However the agent advised that the proposal site was closer to the main entrance, and that siting the car park to the north of the site would mean that visitors would need to walk past the garden area used by residents of the hospice and through an area to the east of the main building which is used for deliveries.
- 8.11 The proposals have since been revised to reduce the scale and impact of development, and the proposal is now sited outside of the 15m ancient woodland buffer zone. Further information has been provided, including extensive bat, dormouse and extended tree surveys; arboricultural report; revised arboricultural impact assessment; and an ecological mitigation strategy that includes the planting of a strip of replacement woodland along the north and north-west boundaries of the site using translocated soil and trees from the area of development, which will eventually link two areas of mature woodland.
- 8.12 The County Ecologist has advised that the revised proposal is much improved, and now minimises impacts to trees and woodland habitat, and avoids impacts to protected species. The loss of priority woodland would be mitigated and compensated for by protecting any retained habitat, and the creation of new habitat, which would be managed in perpetuity, with monitoring reported to the Local Planning Authority. Impacts to designated sites and protected species are therefore not anticipated as a result of the proposal.
- 8.13 However loss of broadleaf woodland priority habitat loss, which forms part of a wider woodland block including ancient woodland, will occur as a result of the proposals. The avoidance of such impacts should be a priority and there may be other locations within the site that could be used for a car park extension.
- 8.14 The Tree Officer has raised concerns in regard to the loss of a significant portion of broadleaf woodland priority habitat, and the impact on the remaining area of woodland which would be less resilient. The proposed design of the hard surfacing may reduce the risk to retained trees however may not work in practice. The compensatory planting belt would not offset the loss of mature broadleaf woodland and too narrow to provide true woodland habitat or be managed as continuous cover woodland in perpetuity. Furthermore, the salvage of soils is an experimental approach that has not been successfully achieved in previously monitored attempts to 'translocate' sections of ancient woodland.
- 8.15 The SDNPA Woodland and Biodiversity Officer, has also raised concerns in regard to the loss of an area of native broadleaf woodland habitat that forms part of a wider network of valuable ancient woodland. The site is immediately contiguous to designated ancient woodland, and itself displays numerous ancient woodland indicator species, such that the lack of designation is considered arbitrary. Notwithstanding the proposed translocation of soil and tree specimens, the provision of new habitat does not adequately compensate for the loss of irreplaceable, long-standing woodland habitat. The ongoing operation and management of the woodland for public use as a car park would also likely involve further soil compaction, felling and tree works for safety reasons.
- 8.16 Research by the Woodland Trust indicates that most development impacts to ancient woodland are indirect. These include 'edge effects', whereby the more fragmented a woodland becomes, the greater the number of edges that are created. Edges are associated with higher temperatures and wind speeds, greater disturbance, increased water loss and the presence of non-woodland species all of which impact on the ecology of the woodland concerned. Edge effects may penetrate to a depth of over 30m in broadleaved woodland. The more fragmented a woodland landscape, the slower the rates of colonisation and even

under ideal situations a minimum of 60 years was needed for new plantations to attain the species diversity seen in core woodland.

- 8.17 In summary the proposal would result in the unacceptable loss of priority broadleaf habitat that forms part of a wider ancient woodland network, both from the development itself, and as a result of the subsequent management of the woodland that would need to be driven by public safety. It is acknowledged that in pursuing the woodland location the applicant has gone to considerable lengths to overcome the objections raised, including compensatory planting. However the measures proposed do not sufficiently mitigate for the loss of priority habitat and impact on the remaining long-standing broadleaf woodland. Officers therefore retain overriding concerns in regard to the proposed siting of the car park within the woodland area, especially given that other areas within the wider site have not been fully explored. The proposal is therefore contrary to saved policies GEN28 and GEN29, emerging policies SD9 and SD11, the NPPF (2018) and the first purpose of the National Park.

Landscape and Amenity

- 8.18 The relevant development plan policies relating to design and landscape include saved policies GEN7: The Form of New Development, GEN32: Noise Pollution and GEN34: Air Pollution; and emerging policies SD4: Landscape Character, SD5: Design, SD7: Relative Tranquillity and SD54: Pollution.
- 8.19 GEN7 states that new development should improve the visual amenities of the local area and make a positive contribution to the quality of the environment, especially in sensitive areas. GEN32 states that noise-sensitive development will not be permitted if its users would be affected adversely by noise from existing or proposed noise-generating uses. GEN34 states that development that contributes to air pollution through fumes or other forms of pollution will not be permitted unless the health, safety and amenity of users of the site are not put at risk and the quality of the environment would not be damaged or put at risk.
- 8.20 SD4 supports development that is informed by landscape character and safeguards the experiential and amenity qualities of the landscape. SD5 supports development that demonstrates a landscape-led approach and respects the local character. Proposals should both integrate with, respect and sympathetically complement the landscape character. SD7 states that proposals will be permitted where these conserve and enhance relative tranquillity and consider whether direct impacts of development are likely to cause changes in the visual and aural environment in the immediate vicinity. SD54 states that development proposals will be permitted provided that levels of air, noise or other pollutants do not have a significant negative affect on people and the natural environment now or in the foreseeable future.
- 8.21 The Landscape Officer has advised that the hospice site is surrounded by surviving medieval landscape, including areas of woodland, which provides a strong sense of place. The areas of woodland also provide additional public benefits in terms of perceptual landscape qualities, including reduction in noise and air pollution from the A27. The proposed mitigation planting is uncharacteristic in landscape terms, and the multifunctional benefits provided by the woodland cannot be reproduced elsewhere on the site. Siting the car park in the area proposed for mitigation would reduce the amount of mitigation required and avoid irretrievable harm to broadleaf woodland.
- 8.22 The SDNPA Woodland and Biodiversity officer has advised that the woodland currently provides significant amenity and public benefit due to the reduction in noise and particulate pollution from the A27, as well as providing some essential tranquillity to the setting. In pursuing this location for a car park, the woodland's ability to provide this amenity would be significantly eroded.
- 8.23 In summary, the siting of the proposed development is considered to have a significant negative impact on its historic landscape character. The loss of woodland in close proximity to the A27 trunk road would increase exposure to traffic noise and emissions, and have a negative impact on the perceptual experience and amenity provided by the landscape. The

development would fail to conserve and enhance the landscape in this part of the National Park, and would therefore be contrary to saved policies GEN7, GEN32 and GEN34 of the Arun District Local Plan (2003), policies SD4, SD5, SD7 and SD54 of the Submission South Downs (Draft) Local Plan (2018), the first Purpose of the National Park and the NPPF (2018).

9. Conclusion

9.1 It is acknowledged that the proposal would provide clear benefits to users of and visitors to the Chestnut Tree Children's hospice, and would assist the hospice in facilitating fund raising and other events. These benefits align with the National Park's duty to seek to foster the economic and social well-being of local communities, and Officers fully support the hospice in its aim to provide a valuable and much needed service.

9.2 However, there are overriding concerns in regard to the location of the proposal, which would result in the unacceptable loss of priority broadleaf woodland habitat, and would have a negative impact on landscape and amenity given the close proximity of the A27. Alternative, potentially more suitable areas within the wider site have not been offered for consideration. It is acknowledged that in pursuing the woodland location the applicant has gone to some lengths to overcome the objections raised. However the measures proposed do not sufficiently mitigate for the loss of priority habitat and impact on the remaining long-standing broadleaf woodland, which is not outweighed by the public benefits that the scheme would accrue. The development overall would therefore fail to conserve or enhance the landscape, scenic beauty and wildlife in this part of the National Park. The application is therefore recommended for refusal.

10. Reason for Recommendation and Conditions

10.1 The application is recommended for refusal for the following reasons:

1. The proposal, by reason of its siting within an area of native broadleaf woodland, would result in the unacceptable loss of priority habitat that forms part of a wider ancient woodland network, both from the development itself, and as a result of the subsequent management of the woodland that would need to be driven by public safety. The proposed compensation planting would not sufficiently mitigate for the loss of priority habitat or the impact of development on remaining woodland habitat. The public benefit that would be derived from the development is not considered to be so significant as to outweigh the identified harm to irreplaceable woodland habitat. The development would fail to conserve and enhance the natural beauty and wildlife in this part of the National Park and is therefore contrary to saved policies GEN28 and GEN29, emerging policies SD9 and SD11, the NPPF (2018) and the first purpose of the National Park.
2. The proposal, by reason of its siting, scale and design, would have a significant negative impact on the historic landscape character of the area. The loss of woodland in close proximity to the A27 trunk road would increase exposure to traffic noise and emissions, and have a negative impact on the perceptual experience and amenity provided by the landscape. The development would fail to conserve and enhance the landscape character of this part of the National Park, and would therefore be contrary to saved policies GEN7, GEN32 and GEN34 of the Arun District Local Plan (2003), policies SD4, SD5, SD7 and SD54 of the Submission South Downs (Draft) Local Plan (2018), the first Purpose of the National Park and the NPPF (2018).

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.

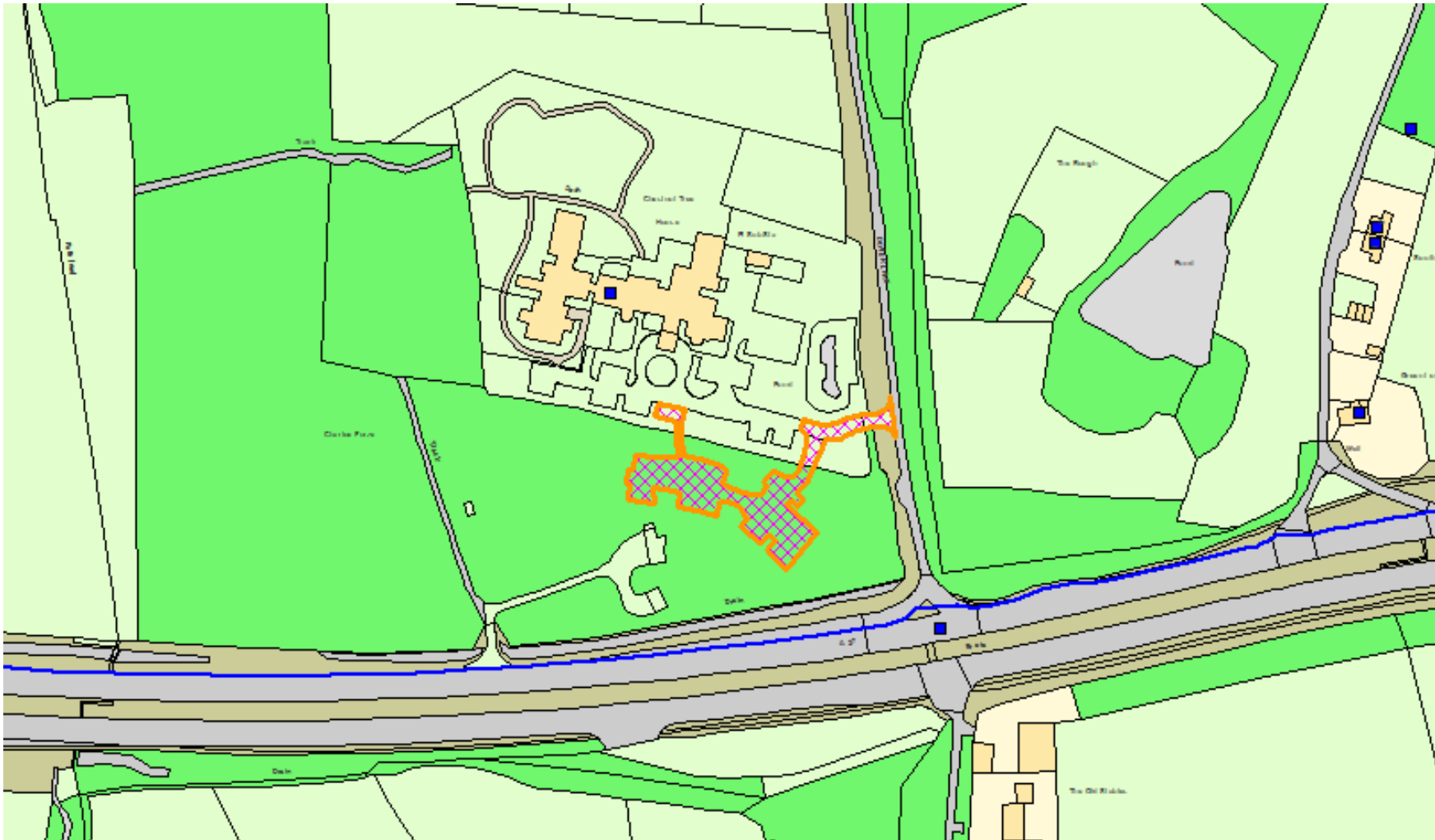
TIM SLANEY

Director of Planning

South Downs National Park Authority

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Appendices I. Site Location Map
SDNPA Consultees Legal Services, Development Manager.
Background [All planning application plans, supporting documents, consultation and third party responses](#)
Documents [National Planning Policy Framework \(2018\)](#)
[Arun District Local Plan \(2003\)](#)
[Submission South Downs Draft Local Plan \(2018\)](#)
[South Downs National Park Partnership Management Plan 2013](#)
[South Downs Integrated Landscape Character Assessment 2005 and 2011](#)
[Development Impacts to Ancient Woodland \(Woodland Trust\) \(2012\)](#)

Site Location Map



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