

Report to	Planning Committee
Date	9 May 2019
By	Director of Planning
Local Authority	Chichester District Council
Application Number	SDNP/18/05595/FUL
Applicant	Mr Mark Griffiths
Application	Campsite for 24 tent pitches, erection of an outdoor kitchen, erection of 2 toilet blocks and one shower/washing-up block with drainage field and creation of a car park, manager accommodation (tent only on site during season).
Address	Westerlands, Norwood Lane, East Lavington, GU28 0QJ

Recommendation: That permission be granted, subject to the conditions set out at paragraph 10.1 of this report

Executive Summary

The applicant seeks retrospective permission for a change of use for up to 24No camping pitches, providing 'eco' accommodation for up to 120 people, and the erection of 4No associated structures. The campsite will be open between 1 April and 30 September, and during the period 1 October to 31 March the number of pitches is proposed to be reduced to 10No solely to provide a limited number of residential courses in outdoor cookery.

The scheme would accrue a number of benefits that would align with the Second Purpose of the National Park, including the provision of tourist accommodation and opportunities for the understanding and enjoyment of the National Park's special qualities. The scheme would also benefit the rural economy.

Concerns have been raised in regard to the impact of development on the Lavington Common Site of Special Scientific Interest (SSSI), water quality and relative tranquillity. However, Natural England and the Environment Agency have no objection to the proposal, and officers are of the view that given the limited scale of development, and opportunities to secure enhancement to the landscape through improved landscaping and land management, the scheme is considered to be acceptable.

The application is placed before Members given the proximity of the Lavington Common SSSI, and the policy issues this raises.

I. Site Description

- I.1 The proposal site is an agricultural field located to the north of the main farm complex of Westerlands Farm, which includes the Grade II listed Westerlands Farmhouse. The wider Westerlands Estate comprises 1,000 acres including a racehorse stud business, and the proposed site was previously used for grazing of horses in association with Westerlands Stud. There are 11 properties on the Estate, 7 of which are occupied by the family who own the farm and associated agricultural workers. 2 yards and a barn are also rented to small businesses.

- 1.2 The proposal is not made by the Westerlands Estate, however nonetheless forms part of the Estate's diversification programme. The applicant has a revenue-linked lease agreement with the Estate, and both parties will continue to work together to develop the offer's links with the Estate, including using Estate sourced produce.
- 1.3 The site is bounded by post and rail fencing, with mature hedge along the eastern boundary and mature trees to the north, some of which are in a state of deterioration. Lavington Common Local Wildlife Site lies approximately 230m to the east of the site, and Lavington Common Site of Special Scientific Interest (SSSI) lies approximately 250m from the northern boundary of the site, separated by a narrow band of deciduous woodland priority habitat, and Duncton Common Road. A private borehole serving the Estate is located to the east of the farm complex.
- 1.4 The site is accessed via a privately-owned driveway off Duncton Common Road, which runs alongside the eastern field boundary and serves the Westerlands Estate and a number of private dwellings. The closest residential dwellings are Westerlands House, some 50m to the south, and Sorrell Cottage, some 200m to the north. Westerland Lodge and Lower Barn House are both sited approximately 300m from the field to the north-west and east respectively. Public footpath East Lavington 718 runs along the southern boundary of the site. Refuse collection in relation to the camping activity is carried out by the applicant, with bins wheeled to the existing refuse collection area serving Westerlands House.

2. Relevant Planning History

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

SDNP/17/06426/PRE A campsite with access along the existing Westerlands driveway. It will consist of wooden buildings for a reception area, a shower block/washing up area and two toilet blocks of two toilets.

The advice stated that the proposal would likely be acceptable providing the design and siting of any structures would not have a harmful impact; the drainage and composting solutions would not impact on the water supply and any impact to protected species found on or near the site satisfactorily mitigated.

SDNP/16/04442/PRE Change of use from equine/pasture to use for glamping - erection of temporary structures (tents).

The advice stated that the current application site was close to the existing farm cluster such that any camping activity would have less of a harmful impact on the landscape and biodiversity of the area. Glamping accommodation would only be considered acceptable if there was no harm caused to the natural beauty, wildlife and cultural heritage of the area, as conserving and enhancing these would take priority over the benefit the additional tourism accommodation would bring.

- 2.2 Reference has also been made by East Lavington Parish Council to the following application made for Land South West of Cathanger Farm, Cathanger Lane, East Lavington, West Sussex, approximately 1.5km distance from the application site, on the northern boundary of Lavington Common SSSI.

12/01736/PENP Change of use of commercial woodland to eco campsite. Advice provided 24.05.2012.

The advice stated that the proposal, comprising of up to 40 bell tents in an area of 4.45ha of commercial woodland adjacent to the SSSI, would unlikely be acceptable due the scale of development and impacts on woodland habitat, ecology and tranquillity.

3. Proposal

- 3.1 The proposal seeks retrospective permission for the change of use of the site to provide up to 24 camping pitches, and the provision of 2 No toilet and shower blocks and a reception and kitchen building. The site was operated as a campsite during the summer of 2018 under an exemption license, which effectively allows the land to be used for the provision of a campsite for 60 days without the need for planning permission. However, planning permission is required for the structures on site.

- 3.2 The proposal originally sought the provision of 30No pitches with year round camping use to allow the use of the kitchen area for short outdoor cooking courses during winter months. Following concerns raised by the Parish Council, National Trust, the Landscape officer and neighbours, the applicant has revised the scheme to reduce the number of pitches to 24No. Up to 8No pre-pitched tents are provided as demand requires, with approximately 2-3 pre-pitched tents remaining up for the entire season. The applicants will occupy an additional tent on the site throughout the main season (1 April to 30 September), which will be dismantled out of season.
- 3.3 During the period 1 October to 31 March the number of pitches is proposed to be further reduced to no more than 10No pitches, to allow the provision of up to 4No 1 day courses and 2No 2 day outdoor cookery courses with an overnight stay per month. Although this allows flexibility for winter camping, participants on the courses may opt to stay in local B&B accommodation in colder months.
- 3.4 The business model seeks to provide inexpensive 'eco-accommodation' and catering that is rooted in, and celebrates the heritage and traditions of the South Downs National Park, offering traditional dishes using locally sourced ingredients derived as far as possible from the Estate and cooked using traditional methods (woodfire). Local charcoal sustainably coppiced wood is and supplied by the Westerlands Estate is also used. The toilets are of a drop compost type, built over wheelie bins which collect solids. The resultant compost, calculated to be approximately 1m³ per year, is proposed to be used as fertiliser, avoiding both the water source and any wooded or species rich/semi-improved grassland areas. Water is provided to the field from a private borehole on the Westerlands Estate, and for the shower block and kitchen area via a service trench along the western boundary of the site.
- 3.5 The structures, which consist of 2No shower blocks, a washing up and shower block, and kitchen/reception, are of roundwood timber frame construction using sweet chestnut coppiced from the Estate, and Douglas fir from the Cowdray saw mill, with no permanent foundations. The roofs of the toilet and shower/washing-up blocks are constructed from pitched corrugated plastic, and the reception/kitchen structure roof from green corrugated sheeting with clear window panels.
- 3.6 Access is provided via the existing driveway. Parking for 30 cars plus 2 disabled spaces will be provided in an existing level and well-drained area to the north east, with no cars being parked in the field. The parking area is currently accessed via a spur from the driveway which is in separate ownership. Cellular 'no-dig' surfacing will be installed on the access ramp of the car park, and around the root protection area of the trees and hedgerow on the eastern boundary, and covered in bark mulch. The existing trees will also be fenced off with a low post and rail fence. Up to 5No campervans will be allowed on pitches within 2 designated areas to the north east near the entrance and washing facilities for guests with accessibility requirements, and on the eastern boundary to the south where they are less visible from the public footpath. Wheelbarrows and pallet trolleys are provided to convey tents and other equipment to the field in wet weather.
- 3.7 The proposed landscaping includes the planting of native species trees in the south-western and north-eastern corners of the field, and the provision of an ecological buffer and area of wildflower meadow to the north of the main camping area.

4. Consultations

- 4.1 **Access:** No objection.
- 4.2 **Ecology:** No objection, subject to condition.
- 4.3 **Environment Agency:** No objection.
- 4.4 **Environmental Health:** No objection, subject to condition.

4.5 East Lavington Parish Council: Objection. Comments:

- East Lavington is a small rural parish which already has a large camping and caravanning site of 90 pitches situated just 700m from the site, and a 10 pitch 'glamping' site just outside the parish boundary 500m away.
- The permanent addition of yet another campsite in this parish and in this location would constitute unacceptable over-development.
- Pre-application advice (12/01736/PENP) for a similar 'eco-campsite' one mile north of Westerlands and bordering the Lavington Common SSSI made clear that an application was unlikely to receive officer support.
- During the period of operation in 2018 there were numerous complaints from local residents regarding traffic, access problems, parking, the presence of camper vans, and noise during the day and evening.
- The campsite is 300m from Lavington Common SSSI and Lavington Plantation SSSI both of which are managed by the National Trust. The interest features of the wildlife and tranquillity of these sensitive areas should be protected for visitors, and not harmed by the intrusive noise of a nearby campsite.
- The access entrance to Westerlands from Duncton Common Road needs to be altered to allow a 90 degree turn from both directions
- The private drive should be widened to allow a safe and separated passage for pedestrians, with passing places being added for vehicles.
- The nearest houses are no more than 200 metres away from the campsite and noise level during the summer season is a major disturbance. There should be a ban on unnecessary noise from 22.00 to 08.00 each day and on amplified music at any time.
- The site is less than 100 metres from the Grade II listed Westerlands Farmhouse.
- No justification has been given in this application for year round use.
- The car park has 30 spaces which seems inadequate, since last year some cars were parked on the verges and on the field itself.
- No more than 20 pitches should be permitted, and camper vans should not be allowed. These are well catered for by the Graffham Campsite just a mile away.
- The drainage field arrangement will result in grey water pooling at the bottom of the slope.
- The disposal of solid waste from the composting toilets and its transfer to other fields on the estate is lacking in detail.
- The use of green wheelie bins to collect the waste from the toilets is incongruous.

4.6 Highways: No objection, subject to conditions.

4.7 Landscape: No objection. Comments [*officer note: received prior to revision of the scheme to 24 pitches and seasonal use*]:

- The site is located in a tranquil area of the National Park, where perceived clutter can have a negative impact.
- The proposal is unlikely to significantly impact landscape or visual amenity, although could have tranquillity implications unless these are mitigated for.
- Measures that could mitigate impact include:
- Reduce the number of pitches;
- Reduce the season from May-September;
- No lighting and curfew for noise and re-entry in the evenings;
- Securement of a landscape and habitat management plan to improve the grassland, replace trees and improve biodiversity.

4.8 Natural England: No objection. Comments:

- Will not have significant adverse impacts on statutorily protected sites or landscapes;

- Will not damage or destroy the interest features for which Lavington Common SSSI has been notified;
- Includes an area of priority habitat, as listed on Section 41 of the Natural Environmental and Rural Communities (NERC) Act 2006.

4.9 **Public Rights of Way:** No objection

4.10 **Tourism:** No objection

- Provides accessible camping to walkers and cyclists on the South Downs Way, and allows 1 night stays accordingly;
- Provides formal and informal camping opportunities for different budgets and the opportunity to experience the special qualities of a relatively unexplored part of the National Park;
- Aims to minimise environmental impact through waste management and the use of local materials used in the structures on site;
- Supports local food producers to provide meals to campers that is cooked on site, helping to restrict spend to the local economy;
- Would support local visitor attractions, the village shop and the two village pubs;
- Supports the SDNPA's ethos of low impact, rustic experiences for visitors, and although in close proximity to another campsite, will cater for a different audience.

4.11 **Tree Officer:** No objection, subject to condition.

5. Representations

5.1 5 letters of objection were received in regard to the initial proposal, raising the following concerns:

Principle

- Another campsite in Lavington was refused in 2012 due to the existing 90 pitch site.
- Graffham Camping and Caravanning Clup site for 90 pitches up to 300 people, glamping at Ridlington Farm of up to 80 people and 'wild camping' at Hurlands Farm of up to 60 people, all situated within a mile of the SSSI at Lavington Common and the SNCI at Lavington Plantation.
- Adequate pitches are available at the existing nearby camping site, where proper facilities and protection against adverse weather is available.
- If 'all year round' permission for the campsite is given, the site is used for permanent 'weekend' living caravans throughout the year.
- Risk of fire and trespassing on privately owned land.
- 8 pitches would be acceptable.
- The proposal should be limited to a 20 pitch site with no motor caravans with conditions to limit noise and improve traffic and drainage arrangements for public safety.

Landscape and Visual Impact

- Will have a further detrimental impact on the adjacent SSSI and SNCI of Lavington Common and Plantation giving rise to habitat loss.
- The site is exposed and the development will be highly visible from the Downs and nearby footpaths including the South Downs Way.
- 30 pitches will require significant hard landscaping and will give the impression of a caravan park.

Access and Traffic

- The 11 living or business properties on the Westerlands estate already generate a lot of extra traffic.

- Westerlands is increasing its operations as a farm so the campsite will be in addition to these activities and will place a significant burden on the driveway and access.
- Only 8 car movements per tent is not realistic as tents in the summer attracted more than one car as many of the tents are 6-8 occupants.
- There is no public footpath available along the drive making the interaction of traffic and people extremely unsafe.
- A change in the layout to access at Duncton Common Road and further speed humps at this junction to prevent vehicles stopping outside Westerlands Lodge should be considered.
- If the existing entrance to the carpark is to be tarmac-ed, another access should be found as the land is in third party ownership.
- The driveway is unsuitable and dangerous for the increase in use and there are no suitable passing places as the peat land on either side of the driveway is soft.
- A one way system would be the safest option.

Amenity

- Increase in the use of local footpaths.
- The site generates significant noise being elevated and due to the prevailing wind.
- Increase in road side rubbish and rural crime rate can't be coincidence with the enormous increase to the population when up to 4 campsites are in operation.

Drainage

- The toilet provision will need to double, and with the new borehole will lead to extra water and sewage 'run off' and additional burden on drainage pipes in the field.
- Disposal of faecal matter from the toilet blocks is not clear.
- The grey water soakaway system will cause a health issue due to seepage of effluent to the surface.

5.2 A letter of objection was also received from the National Trust, raising the following concerns:

- Lack of consideration of the hydrological implications of this proposal on the surrounding sites which are nationally protected for their ecological value, or the impacts that the percolation field will have on groundwater quality.
- The site linked hydrologically to the Lavington Common SSSI through Pott Brook (which runs to the west/north west of the site) and many of the plants and rare species are sensitive to changes in water quality that could occur from additional nutrients being allowed to get into the natural system.
- Unclear whether the required permits have been applied for and obtained such that the surrounding sensitive ecological areas are protected.
- Lack of clarity in regard to the means of disposal of solid human waste and how water quality will be protected given the free draining nature of the geology and the site's location on higher ground to the SSSI and LWS.
- Impact on the character of the South Downs National Park
- There are 3 existing campsites in the surrounding area that provide upwards of 100 pitches suiting all budgets, from the basic to glamping.
- The Trust has noticed an increased impact as a result of additional recreational use arising from such facilities and consider that this is having an adverse impact on the landscape of this part of the National Park.
- The additional recreational use is having an adverse impact on the Annex I bird species with the ground nesting birds being particularly vulnerable and there is concern about the impacts on the rare spider population at Lavington Common.

- There are existing PROWs adjacent to this site which will directly link to both Lavington Plantation and Lavington Common and the year round use of this campsite will inevitably lead to even more recreational use of these areas of land.
- The Trust is concerned that the in-combination effects of this development, alongside those that have already been permitted have not been properly considered and that this level of impact breaches the first purpose of the National Park as it will not conserve the landscape character and tranquillity in this part of West Sussex.
- The Trust recognises that the proposals do fulfil the second purpose of National Parks but consider that the Sandford Principle must be applied in this instance and that its conservation must take precedence.

5.3 10 representations in support of the application were received, raising the following:

- As the nearest neighbours the campsite presence has had no negative impact; noise levels are minimal and there is no light pollution.
- It is a campsite for families seeking a peaceful, rural area enjoying nature and the beauty of the South Downs.
- The campsite's vision is to use local resources as much as possible, blend into its surroundings and help everyone to access and enjoy camping and be outside.
- There has only been a small increase in people using the public footpath.
- There are signs across the campsite explaining the need to respect neighbours, which have worked.
- Any increase in people visiting Lavington Common and Plantation is barely noticeable.
- The campsite has brought a new energy and vibrancy to the village.
- The sound of children playing or smell of woodsmoke is not at odds with the rural surroundings or disturbing to the existing tranquility
- The campsite enhances the social and economic wellbeing of the rural area, promotes opportunities and access to facilities to a larger demographic, and allows families and groups of friends to reconnect with the landscape, local environment and with each other.
- There is a lack of tourist accommodation within the South Downs National Park, and the campsite allows families to stretch their budget more widely across other amenities & activities benefiting local businesses
- Families come to see our chickens and buy eggs for their breakfast
- The site is a working farm as well home to many residents and can be busy along the main drive. However the campsite has minimal impact to traffic and most impact is caused by deliveries to local residential dwellings.
- More farms in our area are increasingly having to offer accommodation as part of their model in order to be sustainable
- The campsite is well managed and quick to resolve issues.
- Woodfire Camping will be an integral and beneficial part to life at Westerlands and the wider community.
- Improving the infrastructure of the site and establishing it as a permanent campsite will be of great importance to supporting tourism growth in the area.
- The increase in footfall helps to improve local sustainability and increase the number of visitors to local attractions.
- Local pubs and shops, which form the heart of functioning rural communities, have benefitted and the increased trade from campers is welcomed in supporting the local visitor economy and the continuity of local services.
- Increasing visitor numbers to this area can only benefit the five independent public houses immediately surrounding Westerlands, as well as the two local shops in Graffham & Heath End, and subsidiary businesses such as local taxi firms.

- The visual impact of the campsite would be minimal and in keeping with the South Downs as camping is a great way for people to enjoy the Sussex countryside in a manner that has minimal impact on the environment.
- The Heath End Sand Extraction Pit when viewed from the South has a far greater impact on the visual environment
- At its height as a Stud & Polo farm, the vehicle movement through Westerlands was far greater than it is now.

5.4 Following amendment of the proposal reducing the number of pitches to 24, and further ecology information received, no further comments have been received from National Trust, or other objectors.

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 Chichester District Local Development Framework (1999). 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 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 (2019) is considered holistically although the following sections are of particular relevance to the applications:

- Section 2: Achieving sustainable development;
- Section 6: Building a strong, competitive economy;
- 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) (2019). 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 The proposal is considered to be major by reason of the development site being over 1ha. However, officers are of the view that the proposal does not constitute major development for the purposes of paragraph 172 of the NPPF, and the 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;
 - 13: Support the financial viability of farm businesses through appropriate infrastructure and diversification developments;
 - 29: Enhance the health and wellbeing of visitors by encouraging, supporting and developing the use of the National Park as a place for healthy outdoor activity and relaxation;
 - 30: Raise awareness and understanding about the National Park;
 - 41: Influence visitor behaviour in order to reduce impacts on the special qualities and increase visitor spend in and around the National Park;
 - 43: Support the development of appropriate recreation and tourism facilities, including a mix of quality accommodation which responds to market demands and supports a sustainable visitor economy;
 - 44: Encourage and support tourism providers to develop sustainable business practices and increase knowledge about the National Park's special qualities;
 - 55: Promote opportunities for diversified economic activity, in particular, where it enhances the special qualities.

7. Planning Policy

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

- RE1 Development in the Rural Area Generally
- RE4 Areas of Outstanding Natural Beauty - Chichester Harbour and Sussex Downs: Protection of Landscape Character
- RE8 Nature Conservation - Non-designated Sites
- BE11 New Development
- BE14 Wildlife Habitat, Trees, Hedges and Other Landscape Features
- R4 Public Rights of Way and Other Paths
- T1 Accommodation and Facilities
- T3 Provision in Rural Areas
- T4 Provision in Areas of Outstanding Natural Beauty

The South Downs National Park Local Plan Submission (2018)

- 7.2 The Pre-Submission version of the South Downs Local Plan was submitted to the Secretary of State for independent examination in April 2018. The Local Plan 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 now in its final stage before adoption with consultation on relatively minor Main Modifications having been undertaken 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 planning policies of the Submission South Downs Local Plan 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

- SD16 – Archaeology
- SD17 – Protection of the Water Environment
- SD19 – Transport and Accessibility
- SD20 – Walking, Cycling and Equestrian Routes
- SD22 – Parking Provision
- SD23 – Sustainable Tourism
- SD25 – Development Strategy
- SD34 – Sustaining the Local Economy
- SD48 – Climate Change and Sustainable Use of Resources
- SD49 – Flood Risk Management
- SD50 – Sustainable Drainage Systems.

8. Planning Assessment

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

- The principle of development in the countryside to provide new tourist accommodation;
- Design, landscape and visual impact;
- Impact on ecology and trees;
- Drainage and the water environment;
- Highways and access;
- Neighbour amenity and environmental health;
- Dark night skies;

Principle of development

8.2 The site is in a countryside location and part of the designated rural area, where development is generally restricted. The development plan policies and the NPPF place 'great weight' on conserving the landscape and the scenic beauty of National Parks, which have the highest status of protection.

8.3 Saved policies RE1 and RE4 seek to restrict development in the rural area, and development which would be harmful to the visual quality or distinctive character will not be permitted except in compelling circumstances. Saved policy R2 permits the development of new recreational facilities in the rural area only where they are a type and level of provision which would not have a serious effect on the resources and character of the countryside.

8.4 Emerging policy SD25 'Development Strategy' of the Submission South Downs Local Plan (2018) carries considerable weight and sets a clear distinction between land within and land outside a settlement boundary.

8.5 Exceptionally, development will be permitted outside of settlement boundaries where it complies with other relevant Local Plan policies, responds to the context of the relevant broad area, and there is an essential need for a countryside location. In addition to the above policies restricting development in the countryside, there are a number of policies which seek support rural development and the rural economy, and the provision of appropriate tourism facilities.

8.6 Saved policies T1 and T3 of the Chichester District Local Plan (1999) support the development of sustainable tourism accommodation outside settlement policy boundaries that is consistent with other policies in the Local Plan, providing the development does not cause adverse effect on the character and appearance of the surrounding landscape, which is the source of attraction to visitors.

8.7 Policy SD23 supports proposals that will provide opportunities for visitors to increase their awareness, understanding and enjoyment of the special qualities; minimise the need for travel by private car and encourages access by sustainable means; and will not detract from the experience of visitors. Policy SD34 supports proposals that foster the economic well-being of local communities and promote businesses linked to tourism, which is a key sector for the National Park.

- 8.8 The second purpose of the National Park is to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public, and in many cases proposals for tourist accommodation accord with this purpose.
- 8.9 The findings of the South Downs National Park Visitor Accommodation Review 2014 also indicate that there is a lack of tourist accommodation across the National Park, especially close to the SDW. The Review also states the wider benefits of supporting tourist accommodation schemes where these improve farming and country estate incomes, thus supporting agriculture and landscape management. The shortfall of accommodation along the SDW is highlighted in the South Downs Partnership Management Plan (SDPMP) (2014-2019), and Policy 43 supports the development and maintenance of appropriate recreation and tourism facilities and visitor hubs in and around the National Park including a mix of quality accommodation which responds to market demands and supports a sustainable.
- 8.10 The submitted information states that the proposal seeks to provide affordable, environmentally conscious tourist accommodation and locally-sourced, on-site catering. The proposal offers visitors an environmentally responsible and educational experience rooted in the local area, and a base from which to explore, discover and learn more about the unique characteristics of the South Downs National Park. The site is located close to the South Downs Way and Serpent Trail, and walkers and cyclists have the opportunity to stay for a single night, rather than the minimum 2 nights normally required. The pre-pitched tents also allow novice campers the opportunity to experience outdoor living without needing to invest in expensive equipment. The campsite is also accessible to those on low budgets, with pre-pitched tents available at lower rates for single-parent families.
- 8.11 In terms of the rural economy, emerging policy SD34 'Sustaining the Local Economy' also carries considerable weight, and supports proposals that foster the economic well-being of local communities and promote businesses linked to tourism, which is a key sector for the National Park. Policy SD40 'Farm and Forestry Diversification' supports proposals which provide long-term benefit to the holding and comprise activities that are subsidiary to the main agricultural business. SDPMP Policy 13 also states the SDNPA's support for the financial viability of farm businesses through appropriate infrastructure and diversification developments, particularly those that will support sustainable farming.
- 8.12 Paragraph 83 of the NPPF (2018) also supports the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings, and the development and diversification of agricultural and other land-based rural businesses. Sustainable rural tourism, which respects the character of the countryside, is similarly supported.
- 8.13 There is also a wider, strategic consideration that the iconic landscape of the South Downs has been shaped by traditional farming over many generations, and the practice of farming continues to contribute to the landscape character, biodiversity and ecosystem services intrinsic to the National Park. The submitted information includes reference to the need for Westerlands Estate to diversify, and shared revenue from the operation and revenue from sales of wood and produce from the proposed camping facilities will help to sustain the agricultural business.
- 8.14 The submitted information references an exemption licence (**Appendix 2**), which allows the applicants to operate the campsite with 25 pitches beyond the 28 days permitted under Part 4 Class B of the Town and Country Planning (General Permitted Development) Order (1995), which may be renewed annually. However, planning permission is required for the structures on site, and the applicants wish to gain planning permission via a more permanent and recognised route.
- 8.15 The applicants propose to adopt the Camping and Caravanning Club's smaller pitch size of 8m x 5m, resulting in an area of approximately 5% of the total area of the field being made available for pitches. Furthermore, the number of people on any pitch will be limited to no more than 6 people, and the total number of people onsite to no more than 120.
- 8.16 Concerns have been raised in regard to the need for a further campsite given others nearby, however the SDNPA Sustainable Tourism officer is supportive of the proposal, which caters

to a different audience from the existing caravan club and glamping offers. The proposal supports the second statutory purpose of National Parks in providing low impact, rustic experiences for visitors to the SDNP where limited accommodation is available. The SDNPA Access team are also supportive of the proposal which will provide low cost visitor accommodation along the SDW National Trail where there is an identified lack of camping and accommodation. It is understood that the glamping site at Ridlington Farm is no longer operating and Hurlands Farm is operating on a very small scale and not currently marketed.

- 8.17 In summary, the scheme would provide clear tourism and rural economy benefits that align with the second purpose of the National Park by virtue of providing sustainable, year-round tourism accommodation that would improve the rate of overnight stay in an area where more types of tourist accommodation are needed. The proposal would also allow visitors to experience some of the special qualities of the National Park. Given the broad policy support for the type of development proposed, the development is considered to be acceptable in principle. Restriction of the use of the site in terms of numbers, length of time and frequency during winter months may be secured via condition.

Design, Landscape, and Visual Impact

- 8.18 Saved policies T1 and T3 support the development of sustainable tourism accommodation that does not cause adverse effect on the character and appearance of the surrounding landscape, which is the source of attraction to visitors, are appropriate to the character of their location, and do not cause adverse effect on the character and appearance of the surrounding landscape as a result of development, ancillary works or curtilages.
- 8.19 Emerging policy SD4 'Landscape Character' of the Submission South Downs Local Plan (2018) carries considerable weight and supports development that conserves and enhances the existing landscape character features which contribute to the distinctive character, pattern and evolution of the landscape; and safeguards the experiential and amenity qualities of the landscape. Emerging policy SD5 'Design' also carries significant weight, and supports development that demonstrates a landscape-led approach and respects the local character of the area. Proposals should both integrate with, respect and sympathetically complement the landscape character and utilise architectural design which is appropriate and sympathetic to its setting. Policy SD23 'Sustainable Tourism' supports proposals that will not adversely affect the character, historical significance, appearance or amenity of the area.
- 8.20 The submitted information seeks to draw on values shared by the SDNPA in regard to Ecosystem services, particularly in regard to cultural and regulating services. The location of the structures on site have been largely dictated by constraints relating to environmental health and the water environment. The toilet and washing blocks and associated discharge of grey water, were required to be sited as far away as possible from the borehole, and the reception and kitchen structure have been located away from the toilet facilities, close the cluster of existing buildings. No vehicles, other than up to 5 No campervans in designated pitches, will be allowed on site. To avoid visual impact, pitches will not be delineated, which will also avoid soil compaction and destruction of grass.
- 8.21 Concerns have been raised in regard to impact on tranquillity. The Landscape officer has not objected to the proposal, however has advised that the site is located within one of the most tranquil parts of the National Park. These areas are very sensitive to changes, and a campsite may have adverse effects on important perceptual qualities, from perceived clutter as well as views. Although the proposed development would not have any significantly adverse implications for landscape or visual amenity, it inherently alters the perceived and experiential and scenic qualities of the local landscape character from being one of unoccupied space, to one of human-influenced, active space. Limiting the number of pitches and seasonal use, and other measures such as no parked cars (on the field) or lighting, and a noise curfew would help to address these concerns. Taking opportunities to enhance the landscape amenity with soft planting and land management may also off-set the potential detriment to tranquillity.
- 8.22 Following concerns raised, the plans have been amended demonstrating less formal planting and screening, and the provision of a wildflower meadow to the north of the site (see

paragraphs 8.26 and 8.29 below). To minimise tent sprawl and perceived clutter, group bookings with pitches adjacent to each other will be permitted to share their occupancy allocation providing a minimum spacing of 3m is observed. Restriction of numbers to either 24 pitches or 120 people (whichever is first) between 1 April and 30 September will also limit impact on tranquillity. The car park area is already fairly well screened by hedgerow and a number of mature trees, and additional soft planting of native tree species is proposed along the western boundary to further screen views of parked cars from within the site.

- 8.23 In summary, the proposal is considered to be acceptable in terms of landscape impact. Further details of hard and soft landscaping and long-term landscape management of the site may be secured via condition.

Impact on Ecology and Trees

- 8.24 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 contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes and sites of biodiversity value in a manner commensurate with their statutory status.
- 8.25 Saved Policy BE14 supports development proposals that minimise impact on features and sites of nature conservation, and take advantage of opportunities for habitat enhancement and creation. Emerging policy SD9 supports proposals that conserve and enhance biodiversity; retain, protect and enhance features of biodiversity and supporting habitat; and ensure appropriate and long-term management of those features. Policy SD11 supports development that will conserve and enhance trees, hedgerows and woodlands.
- 8.26 The proposal site does not include any areas of priority habitat (as noted by Natural England), however the northern boundary abuts an area of priority woodland habitat. An ecological buffer zone and wildflower meadow is proposed to the north of the site, which will be fenced off by chestnut pale fencing. Chestnut pale fencing will also protect the root protection area of the trees in the car parking area, and native bluebells. Around the root protection area of the trees and hedgerow on the eastern boundary of the car park no dig cellular confinement construction will be laid and covered with bark chippings to protect tree root systems. The submitted information has clarified that no trees are proposed for removal, with the only works being management through removal of deadwood for safety.
- 8.27 Concerns have been raised in regard to the cumulative, recreational impact of development on Lavington Common SSSI, which is readily accessible via the local public rights of way network, given other local campsites nearby.
- 8.28 Natural England have raised no objection to the proposal and advise that based on the plans submitted, the proposed development will not damage or destroy the interest features for which the site has been notified.
- 8.29 The County ecologist has reviewed the submitted information, and advises that Lavington Common SSSI has been designated for its lowland heath and woodland habitats, which support uncommon species of spider and ground nesting birds such as nightjar. Review of the condition of the SSSI Units confirms that they are in a favourable condition, with no identified threats. Lavington Common is promoted to visitors and necessary measures are taken to control recreational activities, including the provision of designated footpaths. There are multiple walks available in the areas such that recreational pressure is dispersed. The measures recommended in the submitted ecology report include the display of information at the campsite in relation to the SSSI and the need to keep to designated paths, and dogs on lead. These measures will minimise recreational impact on important habitats and the species they support, such that the alone or in-combination impacts of the proposals are not considered to adversely affect the notifying features of this designation. Although no trees will be removed as part of the proposed works, any future removal of deadwood for health and safety reasons would still be subject to the relevant wildlife legislation. Any such works should be carried out in consultation with the applicant's ecologist and after all necessary surveys and mitigation have been carried out. The fencing plans to protect trees,

and the creation of the wildflower area and 2m ecology buffer are considered to be satisfactory, and may be secured via condition.

- 8.30 The Tree officer has advised that details of the no-dig cellular confinement surfacing proposed in the car parking area should be secured via condition. The landscaping scheme should also include suitable locally native species, and future management of the vegetation on site should be secured to protect the rural character of the area.

- 8.31 In summary, it is considered that the proposal is acceptable in terms of both ecology and trees, subject to conditions securing ecological mitigation measures, a scheme of ecological and landscaping enhancements and a landscape management plan.

Drainage and the Soil and Water Environment

- 8.32 Emerging policy SD50 supports proposals that ensure against increase of surface water run-off, taking account of climate change. Sustainable drainage solutions include porous surfaces, and tree planting where feasible.
- 8.33 Concerns have been raised in regard to the impact of the proposal on groundwater quality from both the disposal of both grey water and compost from the toilets, and on Lavington Common SSSI in terms of the potential for changes in water quality and additional nutrients.
- 8.34 In regard to grey water disposal, the Environment Agency (EA) are satisfied with the position of the shower block and associated grey water drainage, which is sited approximately 250m from the borehole such that risks to groundwater quality are considered low. The Drainage officer has also advised that the informal surface water drainage is satisfactory, with run-off from the roofs of structures infiltrating into the ground both around, and under the structures themselves, such that the effective impermeable area is negligible. Grey water from the shower/washing up block and kitchen will be passed through a grease trap and drained to the ground. There are also no drainage concerns in regard to the proposed surface treatment of the car parking area, which will not result a compacted, impermeable base layer.
- 8.35 In regard to the composting toilets, the applicants have sought independent advice from the EA. In the absence of a current national position statement the EA have provided confirmation that the submitted information is sufficiently robust, and have issued a Local Enforcement Position (LEP) to that effect (see **Appendix 3**). The LEP confirms that the quantity of waste produced will be relatively small (approximately 1m³) and presents a low risk to the environment and human health. The compost will be spread in an area of improved grassland within the wider Westerlands Estate that is not species-rich, in line with advice provided by both the EA and the local SDNPA ranger.
- 8.36 As noted in paragraph 8.28, Natural England has no objection to the proposed development which will not damage or destroy the interest features for which the site has been notified.
- 8.37 In summary the proposal is considered acceptable in terms of the proposed disposal of grey water and compost, and impact to the soil and water environment.

Dark night skies

- 8.38 Policy SD8: Dark Night Skies of the Submission South Downs Local Plan (2018) carries considerable weight. The site is located within the Dark Skies Intrinsic Zone of Darkness (EIa), which is classified as 'dark sky' and includes isolated areas that may not be connected to the main core. In these areas, glazing and particularly rooflights should be kept to a minimum, and external lighting should be limited to timed and/or sensor-controlled lighting designed and shielded to minimise light spillage. External lighting should only be used when needed.
- 8.39 The submitted information states that there will be no external lighting on the site aside for low wattage bulbs in the kitchen area for use as required during food preparation. Restriction of any further lighting may be secured through condition.

Highways and Access

- 8.40 Policy SD21 'Public Realm, Highway Design and Public Art' states that development proposals will be permitted provided that they protect and enhance highway safety and follow the principles set out in the document 'Roads in the South Downs.' Development will not be permitted where it would reduce the biodiversity, landscape and amenity value and character of historic rural roads.
- 8.41 Independent pre-application advice was sought from WSCC Highway Authority in August 2018, and a site visit carried out to assess the impact of the proposal on the highway.
- 8.42 Concerns have been raised in regard to the impact from traffic and safety of the access, and the Parish Council have requested that the access be altered to allow a 90 degree turn from both directions. Concerns are also raised in regard to the narrow width of the private drive, and lack of passing spaces.
- 8.43 The Highway Authority have no objection to the proposal, subject to conditions securing parking provision and cycle parking. Although the layout of the access junction with Duncton Common Road is somewhat restricted by geometry and lack of control over which direction of traffic uses which spur, this is an existing situation, and there is no evidence to suggest that the junction is operating unsafely. A capacity concern on the junction is not anticipated as a result of the proposals, such that it would not be reasonable to require improvements to be made to the junction.
- 8.44 In terms of trip generation, the highest level of vehicle movements would be on Friday afternoons and Sunday mornings, however this would be a maximum of 8 trips per hour, which is not anticipated to result in a highway capacity issue. Duncton Common Road meets the definition of a historic rural road, and whilst no TRICS ('Trip Rate Information Computer System') information has been provided setting out the percentage increase in traffic as a result of development, this would not result in an increase of over 10% per hour, and any changes to traffic levels and patterns arising from the development would conserve the existing ecological, landscape and recreational value of the road.
- 8.45 Although the majority of visitors would arrive by private car, the site is easily accessible from the public right of way network, and the majority of visitors use the public rights of way network rather than private vehicles whilst on site. Lockable bicycle storage is available in the nearby stable block complex, and may be secured via condition.
- 8.46 In regard to the private access road, this is single lane width and the passing of vehicles is possible using informal passing places. Visitors are informed about the need to drive slowly along the access route on booking.
- 8.47 Neighbour Amenity
- 8.48 The nearest neighbours are approximately 30m from the campsite at Barn Cottage and Westerlands House, both occupied by Trustees of the Estate who are supportive of the campsite and its activities. Given the relative distance of the site from other residential development (200-300m), the development is not considered to raise any material issues in regard to noise or disturbance.
- 8.49 Environmental Health have advised that there are no recorded complaints with regard to noise issues from site during 2018 operations and have raised no objection subject to a condition securing a Site Management Plan.

9. Conclusion

- 9.1 Whilst the concerns of the National Trust, Parish Council and neighbours are noted, it is considered that the development promotes opportunities for the public understanding and enjoyment of the special qualities of this part of the SDNP without overall damage to the landscape. Whilst there may be some limited harm to the perceptual qualities of the landscape and tranquility, the secured mitigation, improved landscaping and land management of the site will result in overall enhancement of the natural beauty, wildlife and cultural heritage of the area.

- 9.2 Officers consider that the application is acceptable in both policy terms and in relation to detailed matters, and therefore accords with the NPPF (2018), the Chichester District Local Plan (1999), the South Downs National Park Partnership Management Plan (2014-2019), the Submission South Downs Local Plan (2018) and the DEFRA Circular, and National Park purposes. The application is therefore recommended for approval.

10. Reason for Recommendation and Conditions

- 10.1 The application is recommended for approval 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)/ To comply with Section 51 of the Planning and Compulsory Purchase Act 2004.

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

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

3. The use of the area of land as defined on plan FLA-WOO-LV-002 REV C for camping purposes shall not exceed 24 pitches, or 120 occupants (whichever is reached soonest) on the site at any one time between 1 April and 30 September. No more than 5 camper vans shall be permitted on the site at any one time, in the designated areas as set out in approved plan (FLA-WOO-LV-003 Rev C).

Between 1 October and 31 March the use of the land for camping purposes shall not exceed 10 pitches and shall not be carried out for more than 6 days (4 one-day and 2 two-day courses), with no more than 2 overnight stays, in any calendar month.

Reason: In the interest of amenity and to enable the Local Planning Authority to regulate and control the development and use of land.

4. The kitchen shall not be used for catering purposes other than to serve occupants of the campsite, or by cookery course participants.

Reason: In the interest of amenity and to enable the Local Planning Authority to regulate and control the development and use of land.

5. Within three months of the date of this permission, a Site Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The Plan shall include, but not be limited to, details of:

- i) Curfew for noise after 22:30;
- ii) No amplified music permitted at any time;
- iii) The need to keep to public footpaths;
- iv) Dogs to be kept on leads and all dog fouling cleared promptly;
- v) No livestock on the camping areas at least 30 days prior to camping;
- vi) All campfires to be controlled and limited to small pits; use of dried wood and no foraging permitted;
- vii) All patrons to sign up to site rules through terms and conditions;
- viii) A complaints procedure in place, including management contact details to be displayed prominently at the site and on the website. All complaints and actions must be logged and made available to the Local Planning Authority on request.
- ix) A member of management to be available when patrons are in attendance;
- x) Waste disposal and traffic management.

Thereafter the development shall be undertaken in full accordance with the agreed details unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interests of biodiversity and the amenity of the landscape character of the area.

6. Within three months of the date of this permission, a detailed scheme of hard and soft landscaping works shall be submitted to and approved in writing by the Local Planning Authority. . The scheme shall include details of:

- i) Existing trees and other vegetation to be retained in the scheme;
- ii) Proposed planting plans, including written specifications, cultivation and other operations associated with plant and grass establishment; schedules of plants, noting species, plant sizes; and proposed numbers/densities where appropriate;
- iii) Boundary treatments (including fencing and replacement hedgerow planting) and other means of enclosure including any gates;
- iv) Treatment of surfaces (including the car parking area.)

Thereafter the development shall be undertaken in full accordance with the agreed details unless otherwise agreed in writing by the Local Planning Authority.

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

Any trees or plants which, within a period of five years, die, are removed, or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species, unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interests of biodiversity and the amenity of the landscape character of the area.

7. Within six months of the date of this permission, a landscape management plan for the site, including maintenance of the car parking area and trees within it, shall be submitted to and approved in writing by the Local Planning Authority. The landscape management plan shall include long term objectives, management responsibilities and maintenance schedules for all landscape areas. The landscape management plan shall thereafter be implemented as approved.

Reason: To ensure appropriate landscape management that will contribute to the setting of the development and the surrounding character and appearance of the area, and secure ecological mitigation measures.

8. Works shall be carried out in full accordance with the ecological mitigation measures set out in sections 4.5 and 4.8 of the Updated Phase I Habitat and Species survey (The Ecology Co-Op, March 2019).

Reason: In the interest of biodiversity and to provide sufficient ecological mitigation.

9. Within six months of the date of this permission, a detailed scheme of ecological enhancements shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall reflect the measures set out within section 4.11 of the Updated Phase I Habitat and Species survey (The Ecology Co-Op, March 2019) and the management measures set out within Appendix 4 of the same report. Thereafter the measures shall be fully implemented within the scheme.

Reason: In the interest of biodiversity and to provide sufficient ecological enhancements.

10. Disposal of the compost from the toilet blocks shall be carried out in accordance with approved plan (No. FLA-WOO-LV-008).

Reason: To protect the soil and water environment.

11. No external lighting shall be installed anywhere within the site unless approved in writing by the Local Planning Authority.
Reason: To minimise impacts of lighting on the ecological interest of the site, and protect the South Downs International Dark Night Skies Reserve.
12. Within three months of the date of this permission the car parking area and associated surfacing and fencing shall be constructed in accordance with the details approved and thereafter retained and maintained.
Reason: To provide car-parking space for the use.
13. Within three months of the date of this permission, details of secure cycle storage shall be submitted to and approved in writing by the Local Planning Authority. The development shall subsequently proceed in accordance with any such approved details.
Reason: To provide alternative travel options to the use of the car in accordance with current sustainable transport policies.

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 South Downs National Park Authority has worked with the applicant in a positive and proactive way, in line with the NPPF. This has included the provision of pre-application advice and seeking amendments during the determination of the application to ensure that the development brought forward conserves the natural beauty, wildlife and cultural heritage of the National Park.

TIM SLANEY

Director of Planning

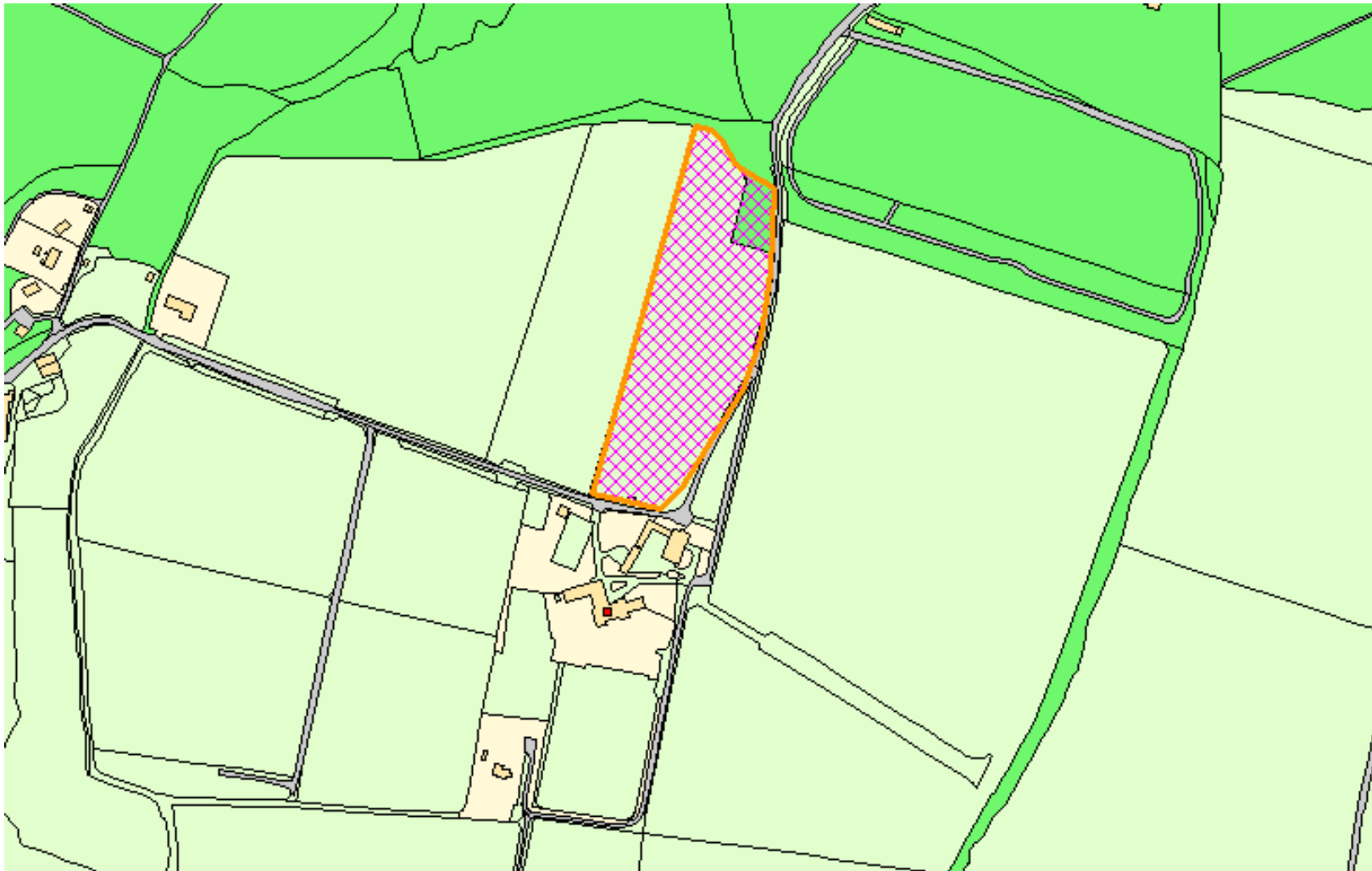
South Downs National Park Authority

Contact Officer: Stella New
Tel: 01730 819216
email: stella.new@southdowns.gov.uk

Appendices
1. Site Location Map
2. Freedom Camping Exemption Licence (to 06.08.2019)
3. Environment Agency Local Enforcement Position (LEP) (11.04.2019)

SDNPA Consultees
Legal Services, Development Manager
Background Documents
[All planning application plans, supporting documents, consultation and third party responses](#)
[National Planning Policy Framework \(2019\)](#)
[Chichester District Local Plan \(1999\)](#)
[Submission South Downs Draft Local Plan \(2018\)](#)
[South Downs National Park Partnership Management Plan 2013](#)
[South Downs Integrated Landscape Character Assessment 2005 and 2011](#)
[The Town and Country Planning \(General Permitted Development\) Order 1995](#)

Site Location Map



This map is reproduced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. South Downs National Park Authority, Licence No. 100050083 (2012) (Not to scale).