

Report to	<b>Planning Committee</b>
Date	<b>11 July 2019</b>
By	<b>Director of Planning</b>
Local Authority	<b>Chichester District Council</b>
Application Number	<b>SDNP/18/00938/FUL</b>
Applicant	<b>Mr Alastair Macdonald-Buchanan</b>
Application	<b>Demolition and change of use of existing buildings to form 10 dwellings and construction of replacement dwelling.</b>
Address	<b>Calloways, Graffham Street, Graffham GU28 0NJ</b>

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**Recommendation: That planning permission be granted subject to the conditions set out in paragraph 9.1 of this report**

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### **Executive Summary**

This application seeks planning consent for the conversion of many of the existing buildings to form 10 dwellings with the demolition of those that cannot be readily converted and the demolition of the existing dwelling and construction of replacement dwelling.

The application site is a farmstead that is identified as a non-designated historic asset and sits within Lavington Stud, adjacent to the site to the north are Calloways Cottages, a pair of grade II listed buildings.

One of the main considerations of this proposal is the acceptability of the provision of dwellings outside of the Graffham Settlement Boundary. It is considered acceptable to allow the provision of dwellings at this site as the proposal will result in a development that enhances this group of non-designated heritage assets. Furthermore, that the proposed scheme will preserve and enhance the character and setting of neighbouring Grade II listed buildings.

A S106 agreement to secure an affordable housing contribution of £520,000 has been signed and completed. The planning application is therefore recommended for approval subject to the conditions listed at section 9.1 of this report. The application is put forward for committee consideration due to the complex planning issues which it raises.

#### **1. Site Description**

- 1.1 The site lies within the Western Scarp Footslopes (Wealden Greensand) of the West Sussex Landscape Character Assessment (Nov 2003), and adjacent to the village of Graffham.
- 1.2 Graffham is a modestly sized Downland village located at the foot of the scarp slope of the South Downs. Existing development comprises buildings of varying style, scale and age (including a number of listed buildings) in a generally linear pattern along The Street. Toward the southern part of The Street and the conservation area, this linear pattern becomes more dispersed and slightly fragmented.
- 1.3 The application site sits within Lavington Stud and the estate is separated into two parts comprising the stud farm buildings/equestrian centre and stable yards set around a

courtyard. To the west of the equestrian buildings, closer to Graffham village is a complex of buildings known as Calloways (the subject of the application). The buildings at Calloways are considered to be non-designated heritage assets and comprise largely of brick and flint construction under slate, plain clay and corrugated roofs. Adjacent to the site to the north are Calloways Cottages, a pair of grade II listed buildings.

- 1.4 The applications site comprises a range of agricultural buildings, a managers dwelling (unrestricted occupancy) and various buildings used for stabling equestrian purposes. The site lies outside of the Graffham Conservation Area.
- 1.5 The cluster of farm buildings is considered to be a non- designated historical asset, this means that whilst the farm cluster is not a formally listed heritage asset, it is still of local historical significance and this is a material consideration when assessing the merits of any planning application.

## **2. Relevant Planning History**

- 2.1 There is no relevant recent planning history directly relating to this site.

## **3. Proposal**

- 3.1 The application seeks planning permission for:  
The demolition and change of use of existing buildings to form 10 dwellings and construction of replacement dwelling.
- 3.2 The proposal results in the overall loss of floorspace by virtue of the loss of buildings associated with agriculture and equestrian use. The applicant states that the buildings are underused and that the current uses can be accommodated elsewhere within the site.
- 3.3 Proposed access is via an existing private drive 270 metres, (approx), in length from Graffham village to the west. Public footpath 987 crosses the site north/south and gives additional accessibility on foot to the primary school and church to the south. The applicant advises that Lavington Stud previously requested that public footpath no. 987 be diverted from between the paddocks and existing buildings to the lane and has now been granted. The development proposals for Calloways thus incorporate this revised footpath position in the design.
- 3.4 The proposals involve the conversion of the existing agricultural/equestrian buildings to form 10 dwellings. The applicant has submitted a condition survey report that supports the proposed selective demolition relating to structures which are either substandard or which need to be removed to provide a viable residential layout.
- 3.5 Additions to the existing building form are for garaging with the exception of House 11 which is a replacement for the existing house.
- 3.6 Following Landscape, Conservation and Design Officer comments, the scheme has been amended in terms of layout and design and reduced in number of dwellings from a total of 12 units to 11.

## **4. Consultations**

### **4.1 Graffham Parish Council – Object**

Summary of comments, (full comments can be viewed on the online planning file):

- The proposed development scheme is not in the public interest
- Adverse cumulative impact due to the creation of an additional 16 open-market houses in conjunction with the Homes of Rest development.
- Very likely to have an adverse impact on the rural landscape character of the area, on the traditional character of the farmstead, on existing residents and on walkers, cyclists and horse riders.
- Not in accordance with SDI: Sustainable Development due to the cumulative impact of the proposed development scheme in such a sensitive location is an important

consideration. In conjunction with the neighbouring development at the Homes or Rest site. There will not be a single onsite affordable home.

- SD3: Major Development: There is no reasonable expectation that exceptional circumstances exist or that it can be demonstrated that the proposed development would be in the public interest.
- SD4: Landscape Character: the proposed development is not appropriate for this site and will adversely affect the character of the area. The combined effect will be to produce an over-domesticated context for the old agricultural buildings that will have a significant negative impact on the character and sensitivity of this area.
- SD6: Safeguarding Views: the cumulative impact of the proposed development in conjunction with the development at the neighbouring Homes of Rest is likely to neither conserve nor enhance the sequential views from the local footpaths and other publicly accessible areas.
- SD7: Relative Tranquillity: the proposed development lies within an area of 'high tranquillity' the intensification of the proposed development will harm, the relative tranquillity which currently exists in the area.
- SD8: Dark Night Skies: The lighting associated with a development of this intensification is very likely to have an adverse impact on the important quality and contribution which this sensitive area makes to the dark night sky and this part of the National Park.
- SD26: Supply of Homes: no specific allocation of housing has been identified for Graffham. Consider that there is no need for an additional supply of eleven open-market dwellings as proposed by the application.
- SD27: Mix of Homes: The proposals are far in excess. Where is the robust and independent evidence for this mix of homes.
- SD28: Affordable Homes: There appears to be no such viability appraisal to support the figure of £520,000 that has been proposed by the CDC Housing Officer. Graffham receives no affordable housing under this particular development and no direct monetary compensation. This is totally unjust.
- SD30: Replacement Dwellings: the existing bungalow (to be replaced by a double storey house at plot 11) amounts to an increase of over 83%, almost three times greater than the net increase of 30% permitted under policy SD30. It is clear that the character of the existing dwelling and the surrounding buildings will be impacted by the over-bearing nature of this house.
- SD41: Conversion of Redundant Agricultural Buildings: we do not believe that sufficient consideration has been given to the needs of local workers and residents in terms of determining the optimum viable use.
- The application has been hastily put together, lacks information and conclusions in many aspects, has little concern for the immediate area and the village it is part of, which will be shown below
- No pre-application advice sought
- Concerns regarding Highway Impact and lack of parking provision
- Concerns regarding impact on adjacent listed dwellings
- Impact on a Public Right of Way has not been satisfactorily addressed.
- Insufficient details provided regarding disposal of sewerage
- Constitutes overdevelopment of the site.
- Consider that a number of the buildings in their present form will have to be demolished and rebuilt to provide acceptable residential accommodation.

## 4.2 CDC Housing Officer – No Objection

- I can confirm that a financial contribution in lieu of an on-site provision of affordable housing would be acceptable. Under the current mix of units this would be £520,000 (based on a 3 bed semi-detached house at scale B, Nov 18). Alternatively, an onsite provision of 4 units in lieu of the financial contribution would be supported.
- You may note that I raised concerns with the mix of market units in my consultation last summer. Taking into consideration the emerging South Downs Local Plan policy SD27, housing register figures and current stock and turnover, the mix of market units (not including the replacement 4 bedroom unit) would need to meet the following requirements:

### Required Market Housing Mix

Property Type	Market	Percentage
1 Bedroom	4	40%
2 Bedroom	-	
3 Bedroom	4	40%
4 Bedroom	2	20%
Total	10	

- If an onsite quota of affordable housing is provided (4 units) then the following mix of units is required.

### Required Housing Mix

Property Type	Market	Affordable Rent	Total
1 Bedroom	-	4	4
2 Bedrooms	3	-	3
3 Bedrooms	2	-	3
4 Bedrooms	1	-	1
Total	6	4	10

- The development should be delivered tenure blind and the affordable housing should not be externally distinguishable from the market housing.

## 4.3 Natural England: No objection.

- Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites. This development relates to the South Downs National Park. We therefore defer to you for comments regarding location and wider landscape setting of the development and whether or not it would impact significantly on the purposes of the designation.
- The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes. It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision making process. We advise LPAs to obtain specialist ecological or other environmental advice when determining the environmental impacts of development.

## 4.4 Dark Night Skies Officer: Comments

- The village of Graffham resides within the Dark Sky Core and despite being a more urban environment, consistently measures high 'bronze' level of sky quality. The

surrounding area (and at times after midnight) will record sky quality measurements exceeding 21 magnitudes per arc second<sup>2</sup>, indicating that the site and surrounding area has some of the best dark skies in the South Downs. Consequently, the need to avoid adverse impacts in the lighting environment will be high.

- In general, provided that the design is in keeping with the low ambient lighting domestic environment of Graffham, then the impact would be minimised. There will be an inherent addition of lighting on the change of use, but I do not think that this should pose a significant threat to DNS, as the current character of the village does not.

#### 4.5 **CDC Environmental Health: No Objection**

- No objection to proposal. I feel that there is sufficient distance between the site and neighbouring residential properties for noise and dust from the development not to be a major issue. I would however ask for restrictions on hours of work to be attached to any consent granted.

#### 4.6 **CDC Environmental Health, (Land Contamination): Comments**

- Given that the site has been used as a farm and more recently a stud, there is considered to be potential for land contamination to be present. Appropriate conditions should be applied. If remediation is found to be required a verification report should be completed and relevant condition should be applied.

##### Air quality

- The proposals represent a net increase of 10 dwellings and it is proposed to provide 29 allocated parking spaces and some unallocated parking spaces at the site. The criteria listed in the Institute of Air Quality Management document (IAQM), Land Use Planning and Development Control: Planning for Air Quality document Jan 2017 suggest that an air quality assessment would be required if a change of more than 500 annual average daily traffic (AADT) flows was likely from a development. From the transport statement submitted, the anticipated daily traffic flows are below this threshold (below 100 AADT). Given the location of the site in a rural area, background air quality is anticipated to be well below the air quality objectives. No air quality assessment is therefore required however mitigation measures should be put forward to mitigate the impact of the development on local air quality.

Suggested measures include:

- a) Provision of electric vehicle recharging infrastructure at the site in order to future proof the site
  - b) Provision of secure, covered cycle parking at each dwelling.
- In order to determine if dust control is required during the construction phase, a construction dust risk assessment should be undertaken following the guidance in IAQM document Guidance on the assessment of dust from demolition and construction version 1.1, 2014.

#### 4.7 **CDC Building Control: No Objection**

- At this stage comments limited to access and facilities for the fire services only. The access facilities would be considered as satisfactory providing the roads and turning provisions meet the requirements set out in Table 8 in Section 11: Vehicle Access of Approved Document B, Volume 1.

#### 4.8 **HCC Ecologist: Comments**

- The application is supported by a Preliminary Ecological Appraisal (Bright Green Ecology, April 2018), a Bat Survey (Bright Green Ecology, October 2015), a Phase I bat scoping and barn owl survey (September 2015) and a Bat Survey Report Addendum (Bright Green Ecology, June 2018). With the addition of the recent Addendum report, my previous comments are now fully addressed and my advice is that there is sufficient ecological information in order to be able to determine this application.

- The site consists of buildings and surrounding well managed garden areas. I understand there are several mature trees on site which according to the ecological information will not be impacted by the proposals. Adequate surveys have been carried out and these have confirmed that the site is used by barn owl, nesting house martins, and three species of bats roosting within five buildings on the site. The proposals involve conversion and demolition of buildings on site and will therefore result in impacts to these species. The reports confirm that works will need to be carried out under licence relating to bats, and various mitigation and compensation measures for bats and birds are set out within the reports.
- Where developments affect European protected species (EPS) such as bats, permission can be granted unless the development is likely to result in a breach of the EU Directive underpinning the Habitats Regulations and is unlikely to be granted an EPS licence from Natural England to allow the development to proceed under a derogation from the law.
- These proposals will result in the loss of low level roosts of three bat species from five buildings within the site, as such an offence will result.
- An EPS licence can only be granted if the development proposal is able to meet three tests:
  1. the consented operation must be for 'preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment', (Regulation 53(2)(e))
  2. there must be 'no satisfactory alternative' (Regulation 53(9)(a)); and
  3. the action authorised 'will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range' (Regulation 53(9)(b)).
- It is for the case officer to assess the proposals against the first two tests - you may wish to ask for further information from the applicant. Various measures have been detailed to avoid harm to bats during the construction works and to provide compensatory roosts within the development. I would support all these measures and, on the basis of the information currently available, and if you are satisfied that the first two tests can be met, I would advise that the development is not unlikely to be licensed.
- I would recommend that planning authority's engagement with the Habitats Regulations is detailed in your report.
- Provided that the agreed mitigation proposals are implemented, I would have no concerns over these proposals. If you were minded to grant permission, I would simply suggest that the measures are secured through condition of any consent.
- I would recommend that the measures relating to nesting birds are set also secured through condition of any consent.

#### 4.9 **SDNPA Design Officer: No Objection**

- No objection following the submission of amended plans. Subject to appropriate conditions with regard to materials and landscaping.

#### 4.10 **SDNPA Conservation Officer: No Objection**

- No objection following the submission of amended plans. Subject to appropriate conditions with regard to materials and landscaping.
- The historic building case is pretty robust with regard to justifying the mix of housing.

#### 4.11 **SDNPA Landscape Officer: No Objection**

- Calloways is a 19th century, regular courtyard farmstead with yards taking a U and L-form plan type based upon Historic England's Farmstead Character Statement for the south-east. The farm is present on the 1st Edition OS map and regular courtyard plan

types such as this tend to present as a single phase of development. This appears to be broadly the case for a large part of Calloways, which suggests it is characteristic of its plan type. As a result, these single phase farmsteads often display a greater consistency in materials and may utilise non-local materials such as Welsh slate. U-shaped, regular courtyard farmsteads are strongly concentrated within landscapes of reorganised piecemeal or planned enclosure often in the 18th and 19th centuries. They are typical of greensand landscapes. This is also true at Calloways. The site is surrounded by early and late 20th century enclosure, therefore the landscape around the site is not contemporary with the farmstead itself, largely created as part of its re-organisation for equestrian uses, which has altered the historic field patterns.

- However, to the north, east and west, the farmstead is bounded by much older fieldscapes (assarts in this case) - of Medieval and Early Post-Medieval origin based upon the Sussex Historic Landscape

#### Characterisation.

- The site is set within a landscape used in recent history as an equestrian holding - it lies within the published 'East Meon to Bury Greensand Terrace' Landscape Character Area (SDILCA) and displays the following characteristics taken from this document:
  - "A strong sense of rural tranquillity resulting from the absence of overt human impact and a low density of settlement. Low density of settlement is characterised by small nucleated medieval settlements comprising farmsteads clustered around a church.
  - Building materials are typically local 'Malmstone', with red and yellow brick detailing, and clay tile roofs.
  - Villages are located at regular intervals along the springline, often associated with artificially dammed mill ponds and mills. The chalk scarp often forms a dramatic backdrop.
  - Contrast provided between the more open arable fields and intimacy and enclosure created by the sinuous bands of woodland and narrow stream valleys.
  - Occasional woodlands and a well-developed hedgerow network provide valuable ecological features.
  - Dramatic views of the chalk escarpment.
  - Deeply sunken lanes have eroded downwards to reveal exposures of the Greensand geology and gnarled tree roots."

#### Landscape Sensitivities:

- Ensure that any proposals for built development respect the settlement pattern that is characterised by nucleated villages with an extremely low level of dispersed development.
- No landscape objection following the submission of amended plans. Subject to appropriate conditions with regard to materials and landscaping.

#### 4.12 **WSCC Flooding/Drainage: No Objection**

- The majority of the proposed site is at low risk from surface water flooding. There is a small area of medium risk shown in the centre of the site. This risk is based on modelled data only and should not be taken as meaning that the site will/will not definitely flood in these events.

#### Ground water contamination and Source Protection Zones.

- The potential for ground water contamination within a source protection zone has not been considered by the LLFA. The LPA should consult with the EA if this is considered as risk.

#### Future development - Sustainable Drainage Systems (SuDs)

- The FRA for this application proposes that sustainable drainage techniques (permeable paving/ infiltration) would be used to control the surface water from this development. This method would, in principle, meet the requirements of the NPPF and associated guidance documents.
- Development should not commence until finalised detailed surface water drainage designs and calculations for the site, based on sustainable drainage principles, for the development have been submitted to and approved in writing by the Local Planning Authority. The drainage designs should demonstrate that the surface water runoff generated up to and including the 100 year, plus climate change, critical storm will not exceed the run-off from the current site following the corresponding rainfall event.

#### 4.13 **WSCC Highways: No Objection**

- In LHA comments dated 30th April 2018 further information was requested in relation to parking/ garage spaces, detailed site plan including access route from Graffham Street and swept path tracking for servicing vehicles and trip generation information of the existing use compared with the proposed. The TN addresses these points, on which the LHA wish to make further comment, as follows.

##### Access & Servicing

- The TN confirms the access arrangements and that only the northernmost arm of the existing informal Y-junction will be used. The plans indicate that the vehicle crossover (VCO) will be widened to allow two cars to pass in opposing directions. The workability of this has been suitably demonstrated in drawing no. 5106/213 Rev. A via swept path tracking. The applicant is advised that the widening of the VCO where it joins with the public highway may require a licence from the Area Engineer to ensure it is made up to specification, contact details within the attached informative.
- Drawing no. 5106/002 Rev B (Proposed Road Improvements) also demonstrates a proposed passing bay along the private access road and widening at the junction of footpath no. 724 and 987. The views of WSCC Public Rights of Way (PROW) team should be sort on these proposed widening works. From a highways point of view the LHA consider that the proposed works will improve the ease of vehicular access along the privately maintained road.
- Swept path tracking plans have also been provided demonstrating that a Fire Appliance and a Refuse Collection vehicle can enter the site from the public highway, navigate within the site and exit on to Graffham Street in a forward gear.

##### Capacity

- TRICS (Trip Rate Information Computer Systems) data within the Transport Statement has been used to estimate the amount of vehicular trips eleven dwellings will create (with one of these being a replacement dwelling). The LHA is also mindful that six existing dwellings at Calloways are accessed via this point, thus a total of 17 x dwellings but a net increase of ten units, will be served by the existing access point.
- An additional 44 daily trips are anticipated, a total of 75 daily vehicular movements at the access point, including the existing and replacement dwellings. Five additional movements in the AM peak and 5 in the PM peak are anticipated. This is not anticipated to result in a highway safety or capacity concern at this existing access point which has been operating without evidence of highway safety concern.
- Existing trip generation information has been provided by the Stud Manager. There are twenty six stables at Calloways and vehicle movements consist of vet visits, horseboxes, and owners visiting mares, feed deliveries and manure collection. The existing six dwellings will also create a number of movements along with refuse collection and postal deliveries for the existing properties. The TN estimates that in a worst case scenario 51 two-way movements could take place daily at the site. The additional and existing



dwellings are anticipated to result in 75 daily vehicular movements thus the increase of up to 24 daily trips is not anticipated to result in a 'severe' impact on the capacity of the nearby road network. A reduction in larger slow moving vehicles with the loss of the stud is also anticipated.

#### Parking

- With the reduction to residential units proposed the parking allocation and layout has been modified. A total of 32 spaces will be provided, 7 of which will be unallocated within car ports. Garages for units 3, 4, 8 and 11 have been increased in depth to 6m to be counted toward parking allocation whereas unit 6's garage will not meet these standards and therefore has not been counted toward parking allocation. The LHA are satisfied that sufficient car parking has been provided for the development and a detrimental impact on the nearby publically maintained road network is not anticipated as a result.

Bicycle parking will be provided within the garages or a separate facility per unit where a garage is not provided. Details of this can be secured via condition.

#### Conclusion

- The LHA does not consider that the proposal for conversion of buildings to form 10 dwellings and 1 x replacement dwelling would have 'severe' impact on the operation of the Highway network, therefore is not contrary to the National Planning Policy Framework (paragraph 109), and that there are no transport grounds to resist the proposal.
- If the Local Planning Authority is minded to approve the application conditions should be attached.

#### 4.14 **WSCC Public Rights of Way: No Objection**

- Whilst I have no objection to the proposal the following advice should be followed to ensure there are no conflicts relating to the proposed development and existence of a Highway through the site. I would also ask that consideration is given to upgrading the existing route to allow for maximum usage and benefit of the local community; For instance upgrading to Bridleway status would allow a link between Bridleway 988 to the North and 954 to the West, allowing cyclist and equestrian usage.

#### 4.15 **Natural England: No Comment**

- Having reviewed the application Natural England does not wish to comment on this proposal.
- This development relates to the South Downs National Park. We therefore defer to you for comments regarding location and wider landscape setting of the development and whether or not it would impact significantly on the purposes of the designation.

#### 4.16 **CDC Tree Officer: No Comment**

### 5. **Representations**

- 5.1 17 letters of representation were received from 15 different address, (2 No residents submitted 2 No letters of objection).

12 letters of objection were received, 2 neutral and 1 letter of support. The matters raised are summarised as follows, the full representation are available on the online application file.

#### Summary

Objections:

- Opportunity to enhance, to give space to grade II listed 1 and 2 Calloways Cottages
- Suggest conversion to a fewer number of homes
- Residential use could be restricted to occupation by local workers (SD41)
- Some of the stabling could be used for local commercial space instead of residential

- Proposal includes demolition of the most interesting building in terms of heritage
- Demolition of an existing building is environmentally unfriendly
- The setting and tranquil nature of the PRow would be adversely impacted
- The buildings are not redundant being used for storage of feed, tractors and stables sometimes used for yearlings.
- Adverse impact to surrounding highways
- Development of these buildings may lead to further parcels of land being sold by the Stud in the future. Leaving the surrounding land without any utility buildings, which would have an impact on the future use of the stud.
- Overdevelopment of the site
- Weight must be given to the emerging South Downs Local Plan as the proposal does not accord with its policies
- Entrance drive proposed to the development is very narrow and proposal would lead to danger of users of the PRow
- Concerns with impact on Bats and Nesting birds
- Where will sewerage and waste water be disposed of, with the facility be communal or individual
- Concerns that the existing electricity supply will be unable to cope with increased number of houses
- The proposals will adversely impact the tranquillity of the area
- The proposals will adversely impact dark night skies
- The village is not in need of executive homes, what it needs is workshops and places for resident artisans to work
- Detrimental impact on noise, light and pollution
- Would create a mini-estate out of keeping with the village and detrimental to the peace and quiet of the area
- Would lead to an air of urbanisation within the village which would harm its appearance
- No affordable housing is proposed on site, it is important to Graffham to have a stock available to people across the income spectrum
- Noise from the electronic gate being opened more frequently will cause disturbance to occupiers of adjacent residential dwellings
- LVIA is inadequate and incorrect
- The proposal conflicts with the purposes of the National Park
- General lack of detail submitted with the application regarding, access, traffic, parking, services, sewerage and impact on PRows
- Concerns regarding the structural condition of the buildings and their suitability for residential conversion
- Damage will be caused by construction traffic to land and roadside
- A better access solution would be to create an access lane immediately behind the war memorial running southwards besides the recreation ground hedge and up the Calloways development
- Lavington stud should be a major source of employment the SDNPA should not consider this application until Stud prospects have been adequately taken into account
- A proportion of the proposed development may be bought as second homes or holidays homes
- The proposal delivers no benefits to the community of Graffham

Neutral:

- Affordable housing should be delivered on site

Support:

- Good use of redundant buildings. Scarcity of housing for sale in Graffham.

## 6. Planning Policy Context

### National Park Purposes

6.1 The two statutory purposes of the SDNP designation are:

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

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

### National Planning Policy Framework and Circular 2010

6.2 Government policy relating to National Parks is set out in English National Parks and the Broads: UK Government Vision and Circular 2010 and The National Planning Policy Framework (NPPF) which was issued 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.

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

6.4 The relevant policies to this application are set out in section 7 below.

### Listed Buildings Act 1990.

6.5 The relevant section is 66 of the general duty, as respects listed buildings in exercise of planning functions. In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

## 7. Planning Policy

7.1 The following policies of the **National Planning Policy Framework** are relevant to this application:

- NPPF01 - Introduction
- NPPF02 - Achieving sustainable development
- NPPF04 - Decision-making
- NPPF05 - Delivering a sufficient supply of homes infrastructure
- NPPF08 - Promoting healthy and safe communities
- NPPF11 - Making effective use of land
- NPPF12 - Achieving well-designed places
- NPPF - Conserving and enhancing the natural environment
- NPPF - Conserving and enhancing the historic environment

7.2 The South Downs Partnership Management Plan (SDPMP) was adopted on 3 December 2013. It sets out a Vision and long term Outcomes for the National Park, as well as 5 year Policies and a continually updated Delivery Framework. The SDPMP is a material consideration in planning applications and has some weight pending adoption of the SDNP

Local Plan. The following Policies and Outcomes are of particular relevance to this case:

- General Policy 1
- General Policy 3
- General Policy 4
- General Policy 5
- General Policy 9
- General Policy 10
- General Policy 28
- Transport Sector Policy 37
- Transport Sector Policy 38
- General Policy 50

### 7.3 The South Downs Local Plan

Applications must be determined in accordance with the development plan unless material considerations indicate otherwise. The statutory development plan is the South Downs Local Plan 2014-2033 and any relevant minerals and waste plans. The development plan policies and other material considerations considered relevant to this application are set out in section 7, below.

- Core Policy SD1 - Sustainable Development
- Core Policy SD2 - Ecosystems Services
- Strategic Policy SD4 - Landscape Character
- Strategic Policy SD5 - Design
- Strategic Policy SD6 - Safeguarding Views
- Strategic Policy SD7 - Relative Tranquillity
- Strategic Policy SD8 - Dark Night Skies
- Strategic Policy SD9 - Biodiversity and Geodiversity
- Development Management Policy SD11 - Trees, Woodland and Hedgerows
- Strategic Policy SD12 - Historic Environment
- Development Management Policy SD13 - Listed Buildings
- Development Management Policy SD15 - Conservation Areas
- Strategic Policy SD17 - Protection of the Water Environment
- Strategic Policy SD19 - Transport and Accessibility
- Strategic Policy SD20 - Walking, Cycling and Equestrian Routes
- Development Management Policy SD21 - Public Realm, Highway Design and Public Art
- Development Management Policy SD22 - Parking Provision
- Strategic Policy SD25 - Development Strategy
- Strategic Policy SD26 - Supply of Homes
- Strategic Policy SD27 - Mix of Homes
- Strategic Policy SD28 - Affordable Homes
- Development Management Policy SD30 - Replacement Dwellings

- Development Management Policy SD41 - Conversion of Redundant Agricultural or Forestry Buildings
- Development Management Policy SD46 - Provision and Protection of Open Space, Sport and Recreational Facilities and Burial grounds / Cemeteries
- Strategic Policy SD48 - Climate Change and Sustainable Use of Resources
- Development Management Policy SD50 - Sustainable Drainage Systems
- Development Management Policy SD51 - Renewable Energy
- Development Management Policy SD55 - Contaminated Land

### **Planning Assessment**

7.4 The main areas of consideration with regard to this proposal are:

- Principle of residential development in this location and loss of farm buildings,
- Housing Mix
- Design and Impact on landscape and adjacent Listed Buildings,
- Sustainability and Efficiency
- Parking and highway safety,
- Neighbouring amenity,
- Drainage,
- Land contamination,
- Ecology,
- Affordable Housing and CIL.

#### The principle of the proposal

7.5 The application is not considered to be major development in the sense of it having a significant adverse impact on the purposes for which the South Downs National Park has been designated (paragraph 172 of the NPPF). This is due to the number of dwellings proposed and that the scheme involves the redevelopment of an existing farm complex.

7.6 The site falls outside of the Graffham Settlement Boundary. Therefore, SD25 part 2 of the South Downs Local Plan is material, which makes clear that in such circumstances, development will only be considered in exceptional circumstances. However, in this instance, policy SD41, Conversion of Redundant Agricultural or Forestry Buildings, is also engaged. To this regard, the development proposed is considered acceptable as the conversion of existing buildings will retain the farm complex which is a non-designated heritage assets in an appropriate manner.

7.7 The need to retain and restore the heritage assets within this site also needs to be balanced against the policy requirements of SD41 in that the conversion must represent the most appropriate optimal viable for the buildings. The applicant has contacted affordable housing providers, including those suggested by the South Downs National Park Authority, and none have been willing to take on this site for affordable housing. It is considered therefore, given that the very specific circumstance of this application and that the development enables the preservation of an historic farmstead, that the scheme for residential conversion with a financial contribution for off-site affordable housing is acceptable in principle.

### Housing Mix

- 7.8 In terms of the mix of housing, the scheme has been amended so that an increased percentage of smaller units is provided on site following initial officer concerns that the scheme did not meet Policy SD27 of the SDLP that requires that a mix of homes are provided.

The final housing mix is as follows,

- 2 No 2 bed units - 18%
- 5 No 3 bed units - 46 %
- No 4 bed units - 36%

- 7.9 Whilst this mix is not in full accordance with policy SD27, consideration has been had to the retention of the heritage of the historic building within the site. The SDNPA Conservation Officer considers that the applicant had put forward a robust case for the housing mix proposed and that preserving the relationship of disparate buildings of different build dates to each other would be the main conservation benefit of the conversion exercise. If left in agricultural or a low-level commercial use, many of the buildings would end up either under-used and left to deteriorate further, or replaced with more functional modern structures

### Design and Impact on landscape and adjacent Listed Buildings

- 7.10 The proposed development has been the subject of comprehensive revision following detailed discussions with officers, including the Conservation Officer, Design Officer and Landscape Office. With regard to the proposed housing conversion and mix the Conservation and Design Officer consider that the larger buildings are best left alone as additional units often require major interventions such as subdividing spine or party walls. Unless the heritage value of the building is fairly low, the general conservation rule is one conversion per building. (The larger buildings here are mostly quite reasonable heritage quality).
- 7.11 It is considered that the farmstead as a whole, including the extensions throughout the earlier C20th to cater for equestrian uses has resulted in an extremely attractive group value - this is a case in which the sum of the whole does exceed the value of the individual parts. Preserving this relationship of disparate buildings of different build dates to each other would be the main conservation benefit of the conversion exercise.
- 7.12 It is considered that the revisions to the design of the buildings and the landscape scheme will result in a development that enhances this group of non-designated heritage assets. Furthermore, that the proposed scheme will assist to preserve the setting of neighbouring Grade II listed buildings. The changes to the layout and the detailed redesign of boundary treatment and placement of parking and hardstanding, along with the proposed orchard planting will result in visual enhancement of the site that will not be detrimental but enhance the sites value within the wider landscape setting.
- 7.13 The proposed replacement dwelling, whilst exceeding the 30% increase in footprint required by policy SD30 of the South Downs Local Plan, is considered to be acceptable as the proposed scale and massing relates well to the wider development and it is considered to be of an appropriate design that will enhance the heritage of the site. The overall scale of the proposed dwelling has been reduced from 235m<sup>3</sup>, a 70% increase in footprint of the existing dwelling, to 199m<sup>3</sup> that represents an increase in footprint of 44%.

### Sustainability and Efficiency

- 7.14 Policy SD48 of the emerging SDLP requires that proposals demonstrate that development incorporates sustainable design features. Whilst this is often more difficult to achieve when converting buildings, gains and enhancements may still be achieved. It is considered appropriate to include a condition on a planning consent that requires a schedule of measures to minimise energy consumption and maximise renewable energy generation to be submitted to and approved by the LPA.

### Neighbouring Amenity

- 7.15 It is not considered that this development would have an unacceptable detrimental impact on the amenities of the occupiers of the adjacent buildings, either residential or commercial. Overlooking and overbearing will not be unacceptable due to a sensitive design that works with the site constraints. Concerns has been raised by local residents with regard to the operation of the electronic gate at the entrance to the site. However, this is a matter of gate maintenance and would constitute an Environmental Health matter, falling outside of the planning system if the use of the existing gate cause disruption and disturbance.
- 7.16 It is considered that the greatest level of disturbance will be experience by local residents and businesses during the demolition stage. This must be controlled through the conditioning of a Construction & Environmental Management Plan.

### Parking and Highway Safety

- 7.17 The Local Highway Authority, (LHA) has been consulted on the applications and advises no objection to the submitted Transport Statement (TS) following amendments to the scheme and further submitted information. The updated information confirms the access arrangements and that only the northernmost arm of the existing informal Y-junction will be used. The plans indicate that the vehicle crossover (VCO) will be widened to allow two cars to pass in opposing directions. The LHA considers that the workability of this has been suitably demonstrated in drawing no. 5106/213 Rev and that the proposed works will improve the ease of vehicular access along the privately maintained road. Swept path tracking plans have also been provided demonstrating that a Fire Appliance and a Refuse Collection vehicle can enter the site from the public highway, navigate within the site and exit on to Graffham Street in a forward gear.
- 7.18 The LHA also concluded on the basis of the submitted evidence that the scheme is not anticipated to result in a highway safety or capacity concern at the existing access point, which has been operating without evidence of highway safety concern. Furthermore that the additional and existing dwellings that are anticipated to result in 75 daily vehicular movements thus the increase of up to 24 daily trips is not anticipated to result in a 'severe' impact on the capacity of the nearby road network. A reduction in larger slow moving vehicles with the loss of the stud is also anticipated.
- 7.19 It is also considered that sufficient car parking has been provided for the development and a detrimental impact on the nearby publically maintained road network is not anticipated as a result.

### Drainage

- 7.20 The proposed site is wholly within flood zone I (low risk). The submitted documents state that the redevelopment of the site will result in a similar level of surface water run-off, as per the existing site. It is therefore agreed that a similar surface water drainage strategy, to that which currently serves the site, will be suitable in providing adequate drainage to accommodate the proposal.
- 7.21 The submitted documentation advises that the existing site disposes of its foul water by way of an onsite treatment plant, as there are no foul sewers in the vicinity. It is proposed that foul water relating to the proposal will be disposed of in a similar manner. The system being considered is produced by Klargestar and is suitable to accommodate single or multiple dwellings. Such a system should be sited no closer than 7m from the nearest dwelling. Further details of this system should be required by condition attached to a planning consent.

### Ecology

- 7.22 A bat survey and nesting bird survey has been submitted to support the application and the mitigation measures therein are considered to be acceptable by the SDNPA's Consultant ecologist.
- 7.23 It is for the LPA to consider to consider the first two tests and, given the circumstances of these underused non-designated heritage assets and that the scheme will provide residential

accommodation, it is considered that there is an overriding public interest for this development. In regard to the third test the Consultant Ecologist concludes that, " I would highlight that the proposed mitigation set out at the end of Appendix B of the Addendum report details barn owl nesting opportunities built in to the roof structure of the proposed garage of House 2, which will require a 'small dormer' feature on the eastern elevation. Please note this is not reflected on the architect's plans which you may therefore require to be amended..... on the basis of the information currently available, and if you are satisfied that the first two tests can be met, I am confident that the development is not unlikely to be licensed". As the installation of a dormer within the roof of this garage may not accord with the aesthetics of this building and its setting within the heritage assets, it is considered necessary to impose a condition that will require a final ecology report to address a potential alternative method of mitigation to address this matter.

- 7.24 Therefore, it is considered that the Habitats Regulations have been properly assessed and considered with regard to concluding the acceptability of the proposal in terms of the ecology considerations of this site.

#### Land Contamination.

- 7.25 Given the previous and existing land uses at the site there may be localised land contamination at the site. Further land contamination surveys are required to assess the risk. The Environmental Health Officer is satisfied that this requirement can form conditions to be attached to a planning consent.

#### Affordable Housing and CIL

- 7.26 The SDNPA adopted its charging schedule for the Community Infrastructure Levy on 1st April of this 2017. This requires new residential developments to make a financial contribution towards local infrastructure projects such as education, transport and rights of way. The applicant has submitted the CIL form and, as confirmed by a number of objectors to the application, the buildings still have a low level use. Therefore, whilst the development may be CIL liable, the applicant may wish to demonstrate to the SDNPA CIL officer following determination that some of the buildings have been in use for at least 6 months of the last 3 years. The agent to the application has been advised that the SDNPA will require robust evidence to precisely establish any existing use.
- 7.27 It is expected, in line with the development plan policy SD28 of the South Downs Local Plan that 4 affordable housing units would be provided on site. In this case, the application has been under consideration for some time prior to the adoption of the South Downs Local Plan and it involves the conversion of existing non-designated heritage assets. Furthermore, the Applicant approached a number of housing providers, including those suggested by the SDNPA, and none were interested in delivering the units on site, (although this in itself would not be a sufficient reason not to require affordable units to be delivered on site). However, taking all matters into the balance, it is considered in this instance that an off-site contribution of £520,000 is acceptable; the development enables the retention of non-designated historic assets and will ensure that the setting of the adjacent listed buildings remains unharmed. To this regard a S106 has been signed and completed securing this sum.

## **8. Conclusion**

- 8.1 It is considered that the application is acceptable and broadly accords with the adopted South Downs Local Plan. It should be noted that the applicant has not submitted a formal statement as required by policy SD2 Ecosystem Services. However, this considered acceptable in this instance as the application was submitted, some time ago before the very recent adoption of the SDLP. Furthermore, as considered throughout the planning assessment section of this report, the Case Officer has addressed the proposed scheme's merits in relation to the requirements of policy SD2.
- 8.2 It is considered that, through appropriately worded conditions, the scheme can sustainably manage land and water environments as required by policy SD2. Also, through the introduction of good quality landscaping, such as the proposed introduction of a new orchard, that the scheme can provide better and joined up natural habitats that can also



provide some degree of food production. The management of the land sustainably, through flood risk management, carbon storage, reducing levels of pollution and mitigation of climate change have also been considered through the application process. Again, it is concluded after considering the reports/evidence submitted to support the application, that suitably worded conditions, (including a suggested condition that required the submission and approval off a scheme to maximise renewable energy generation on site), can ensure that this scheme has an overall positive impact on the ability of the natural environment to contribute to goods and services. There is a delicate balance as regards the provision on or off-site regarding affordable homes having regard to the historic asset. However, it is considered in the light of the efforts made regards on-site provision that the scheme is acceptable.

- 8.3 It is recommended that planning permission be granted for this proposal subject to the recommended conditions below. A S106 agreement to secure an affordable housing contribution of £520,000 has been signed and completed.

## **9. Reason for Recommendation and Conditions**

- 9.1 It is recommended that the application be approved subject to the following conditions:

### Time Limit

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).

### Accordance with Plans

2. The development hereby permitted shall be carried out in accordance with the approved plans.

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

### Materials

3. No development shall commence on any of the buildings, hereby permitted, until samples of the external materials (to include, but not limited to, wall, roofs, windows, doors, rainwater goods and fascia's) for that respective building has been submitted to and approved, in writing, by the Local Planning Authority. The details shall be implemented and maintained as approved.

Reason: To safeguard the landscape character of the site

4. No development shall commence on any of the hardstanding, hereby permitted, until samples of the external materials for that respective hardstanding has been submitted to and approved, in writing, by the Local Planning Authority. The details shall be implemented and maintained as approved.

Reason: To safeguard the landscape character of the site in accordance

### Landscaping

5. No development above slab level shall commence until a landscaping scheme has been submitted to and approved, in writing, by the South Downs National Park Authority. The landscaping scheme shall include:

- Schedules of plants, noting species, planting sizes and proposed numbers/densities where appropriate,
- A timetable for the implementation of all landscaping details and
- A schedule of landscape maintenance for a minimum period of 5 years.

The landscaping scheme shall be implemented and thereafter adhered to as agreed.

Reason: To safeguard the landscape character of the site.

## Lighting

6. No external lighting shall be installed until its details (to include lux rating, hours of operation, angle of lighting and colour temperature) have been submitted to and approved, in writing, by the South Downs National Park Authority. The details approved shall be implemented and maintained as approved.

Reason: To safeguard the landscape character and dark night skies of the site and National Park and enhance biodiversity

7. All existing roof lights shall be fitted with auto black out blinds and all replacement windows shall be fitted with low transmittance glass.

Reason: To safeguard the landscape character and dark night skies of the site and National Park

## Contaminated Land

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

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

9. Contaminated Land Phase 2 Report - If the Phase 1 report submitted 'pursuant to condition 8 above' identifies potential contaminant linkages that require further investigation then no development shall commence until a Phase 2 intrusive investigation report has been submitted to and approved in writing by the LPA detailing all investigative works and sampling on site, together with the results of the analysis, undertaken in accordance with BS 10175:2011/A1:2013 - Investigation of Potentially Contaminated Sites - Code of Practice. The findings shall include a risk assessment for any identified contaminants in line with relevant guidance.

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

10. Contaminated Land Remediation - If the Phase 2 report submitted pursuant to condition 9 above, identifies that site remediation is required then no development shall commence until a Remediation Scheme has been submitted to and approved in writing to the Local Planning Authority detailing how the remediation will be undertaken, what methods will be used and what is to be achieved. Any ongoing monitoring shall also be specified. A competent person shall be nominated by the developer to oversee the implementation of the Remediation Scheme. The report shall be undertaken in accordance with national guidance as set out in DEFRA and the Environment Agency's Model Procedures for the Management of Land Contamination CLR11. Thereafter the approved remediation scheme shall be fully implemented in accordance with the approved details.

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

11. Contaminated Land Verification Report - The development hereby permitted shall not be first occupied until a verification report for the approved contaminated land remediation has been submitted in writing to the Local Planning Authority. The report

should be undertaken in accordance with national guidance as set out in DEFRA and the Environment Agency's Model Procedures for the Management of Land Contamination CLR11.

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

#### Details of Foul Drainage

12. No development approved by this permission shall be commenced until full details of the proposed means of foul drainage disposal have been submitted to and approved in writing by the Local Planning Authority. Thereafter all development shall be undertaken in accordance with the approved details and no occupation of any of the development shall be take place until the approved works have been completed. The foul drainage system shall be retained as approved thereafter.

Reason: In order to secure a satisfactory standard of development.

#### Details of Surface Water Disposal - Sustainable Drainage

13. No development approved by this permission shall be commenced until details of surface water drainage, which shall follow the principles of sustainable drainage as far as practicable, have been submitted to and approved by the Local Planning Authority. The drainage designs should demonstrate that the surface water runoff generated up to and including the 100 year, plus climate change, critical storm will not exceed the run-off from the current site following the corresponding rainfall event. Thereafter all development shall be undertaken in accordance with the approved details and no occupation of any of the development shall be take place until the approved works have been completed. The surface water drainage system shall be retained as approved thereafter

Reason: To ensure satisfactory surface water drainage.

14. The development hereby permitted shall not be brought into use until details of the management and maintenance of any parts of the drainage system which will not be adopted (including any ponds, ditches, swales, permeable paving and land drains) has been submitted to and approved in writing by the Local Planning Authority. The submitted details should specify the responsibilities of each party for the implementation of the Sustainable Urban Drainage scheme (SuDs), a timetable for implementation, provide a management plan and maintenance plan for the lifetime of the development which should include arrangements for adoption by any public authority or statutory undertaker and any other arrangement to secure the operation of the scheme throughout its lifetime. The management and maintenance arrangements shall be carried out in accordance with the approved details over the period specified.

Reason: To ensure the efficient maintenance and ongoing operation of the SuDS system and to ensure the best practice in line with the most up-to-date guidance.

#### Access

15. No part of the development shall be first occupied until such time as the vehicular access serving the development has been constructed in accordance with the details shown on the drawing titled Proposed Road Improvements and numbered 5106/002 Rev B.

Reason: In the interests of road safety.

#### Cycle parking

16. No dwelling shall be first occupied until covered and secure cycle parking spaces serving the respective dwellings have been provided in accordance with plans and details to be submitted to and approved by the Local Planning Authority. These spaces shall thereafter be retained for their designated use.

Reason: To provide alternative travel options to the use of the car in accordance with current sustainable transport policies.

Vehicle parking and turning

17. No part of the development shall be first occupied until the vehicle parking and turning spaces have been constructed in accordance with the approved plan. These spaces shall thereafter be retained for their designated use.

Reason: To provide adequate on-site car parking and turning space for the development.

Construction Management Plan

18. No development shall take place, including any works of demolition, until a Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority. Thereafter the approved Plan shall be implemented and adhered to throughout the entire construction period. The Plan shall provide details as appropriate but not necessarily be restricted to the following matters,

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

Reason: In the interests of highway safety and the amenities of the area.

Ecology

19. No works pursuant to this permission shall commence until a final Ecological Report (indicating what alternative mitigation measures are proposed to meet the mitigation measures as set out at the end of Appendix B of the Addendum report that details barn owl nesting opportunities built in to the roof structure of the proposed garage of House 2) shall be submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the agreed final Ecological Report and the nesting bird (including Barn Owl and nesting House Martins) measures set out section 6.1.11 and within Appendix B of the Bat Survey Report Addendum (Bright Green Ecology, June 2018) unless otherwise approved in writing by the LPA.

Reason: in order to provide adequate mitigation for protected species.

20. Development shall be carried out in accordance with the measures set out in Section 6.1.2 to 6.1.10 (inclusive) and Appendix B of the Bat Survey Report Addendum (Bright Green Ecology, June 2018) unless varied by a European Protected Species (EPS) license subsequently issued by Natural England. Thereafter, the replacement bat roosts shall be permanently maintained and retained in accordance with the approved details.

Reason: to ensure the favourable conservation status of bats

Services

21. No development above slab level shall commence until a schedule of measures to minimise energy consumption and maximise renewable energy generation have been

submitted to and approved, in writing, by the South Downs National Park Authority. The details shall be implemented and maintained as approved.

Reason: To ensure the development contributes to the management of the effects of climate change.

22. All new electricity and telephone lines shall be laid underground unless otherwise agreed, in writing, by the Local Planning Authority.

Reason: To safeguard the landscape character of the site.

## **10. Crime and Disorder Implication**

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

## **11. Human Rights Implications**

- 11.1 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.

## **12. Equality Act 2010**

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

## **13. Proactive Working**

- 13.1 In reaching this decision the Local Planning Authority has worked with the applicant in a positive and proactive way, in line with the NPPF. This has included the opportunity to provide additional information to overcome technical issues and the opportunity to amend the proposal to add additional value as identified by SDNPA Officers and consultees.

### **TIM SLANEY**

**Director of Planning**

**South Downs National Park Authority**

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Appendices I. Site Location Map  
SDNPA Consultees Legal Services, Director of Planning.  
Background Public Access, Application Summary and Associated Documents  
Documents <https://planningpublicaccess.southdowns.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=P4APKC TUIBF00>  
National Planning Policy Framework  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/607/2116950.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/607/2116950.pdf)  
National Planning Practice Guidance  
<https://www.gov.uk/government/collections/planning-practice-guidance>  
Defra: English National Parks and the Broads – UK Government Vision and Circular 2010.  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/221086/pbl3387-vision-circular2010.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/221086/pbl3387-vision-circular2010.pdf)  
SDNP Partnership Management Plan  
<https://www.southdowns.gov.uk/national-park-authority/our-work/key-documents/partnership-management-plan/>  
South Downs Local Plan  
<https://www.southdowns.gov.uk/planning/national-park-local-plan/>

Site Location Map



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