

Report to	Director of Planning
Date	6 May 2020
By	Development Management Lead
Local Authority	Lewes District Council
Application Number	SDNP/19/03768/FUL
Applicant	Mr B Taylor
Application	Consolidation of Iford Estate Farming Operations to include the construction of agricultural buildings (for housing of livestock, grain handling and storage), a silage Clamp and new access road from Piddinghoe Road.
Address	Iford Farm, The Street, Iford, East Sussex

Recommendation: That planning permission be granted subject to the conditions set out in paragraph 10.1 of the report.

Executive Summary

The applicant seeks permission to create an expanded farm complex at Iford Farm to support the Estate's farming operation. It is proposed, through the erection of 8 new buildings, a silage clamp and the provision of a new access and track, that the farming operation can be carried out more effectively; the development will facilitate the concentration of both arable and livestock (cattle).

The main issues relevant to the determination of this application are considered to be:

- Principle of Development and Agricultural Justification
- Landscape and Visual impact
- Impact on Conservation Area
- Drainage and Water Environment
- Biodiversity, Ecology and Ecosystem Services
- Impact on Surrounding Residential Amenities
- Highways, Access and Traffic
- Public Rights of Way
- Dark Night Skies

The report concludes that the scheme will provide a centralised base for the farming operations of the Estate at Iford Farm and that the proposals will not cause an unacceptable detrimental impact and that the design and layout is the most suitable. The identified benefits to the farming operation are supported by the requirements of policy SD39 and other relevant policies of the South Downs Local Plan. The proposal is supported by a Whole Estate Plan which sets in context the proposal and provides a framework for delivering related benefits to the locality and the landscape, in line with policy SD25. That said, it is important that this application is considered on its planning merits as a stand-alone scheme. To this regard it is considered that the submitted application has demonstrated

The application is currently being considered under the existing delegation process but with Member consideration due to the nature of the application and policy considerations.

1. Site Description

- 1.1 Iford Farm is located on the south-eastern edge of the village of Iford, approximately 5.4 kilometres south of Lewes, on the Ouse Valley Sides immediately adjacent to the Ouse Valley floodplain. Iford village is a small downland village which forms one of several villages just above the floodplain of the River Ouse. The village is designated a Conservation Area although Iford Farm lies predominantly immediately beyond the Conservation Area boundary to the southeast.
- 1.2 The site lies within the Ouse Valley Sides landscape type identified within the South Downs Integrated Landscape Character Assessment. Immediately to the east lies the Ouse Floodplain character area and to the southwest and east, rising above the valley sides, dramatic chalk escarpments. The landscape is defined by a flat, open and undeveloped character of the valley floors and the floodplains are highly visible from the adjacent settled valley sides and downs.
- 1.3 To the north of the site the boundaries are open in nature and form part of the agricultural yard, set within the existing complex of agricultural buildings. The remaining part of the application site is currently a paddock. The boundaries are defined by post and wire fencing and mature vegetation. The application site forms part of the wider Iford Farm complex, which consists of a number of properties and area of land around the village
- 1.4 To the west of the existing farm complex lies groups of semi-detached dwellings, of which a number are listed buildings with further agricultural buildings beyond. To the north, south, and east lie agricultural fields. A public right of way runs through the village in a north-south direction and footpaths extend from the villages to the chalk downs to the west and a footpath runs east across fields to the south of the existing farmyard. Above the valley running along the top of the chalk escarpment to the southwest is the South Downs Way long distance footpath. There are also substantial areas of open access land on the steep escarpment slopes to the west and also on the chalk slopes to the northeast. As a result the development site is overlooked from areas of higher land including areas of open access land.

2. Relevant Planning History

- 2.1 The following planning history is relevant to the application site:
 - LW/09/1177. Conversion and extension of farm building to provide facilities building for game shooting and associated parking and widening of access onto C7 road and formalising first section of track off C7 road. Approved 24.03.2010.
 - SDNP /12/02343/FUL - Erection of three agricultural buildings and provision of new farm access (resubmission of SDNP/12/01321/FUL). Approved 16.04.2013. This
 - SDNP/13/03181/DCOND - Discharge of conditions 5, 6 & 7 relating to planning approval SDNP/12/02343/FUL. Approved 21.04.2016
 - SDNP/14/05468/CND. Variation of condition 1 attached to planning approval LW/09/1177 to vary the use of the building as a facility connected to game shooting and agriculture, the use shall only occur between Monday to Saturday 7am-5pm. Approved 28/01/2015.
 - SDNP/14/06320/FUL. Section 73A retrospective application for change of use of land from agricultural to mixed use of agriculture and game rearing and change of use of redundant agricultural buildings to a mixed use of agriculture and ancillary storage for the shoot business. Refused and Allowed on appeal 28.10.2015.
 - SDNP/19/03584/PA3R - Notification for Prior Approval for a change of use of agricultural building to a flexible B1/B8. Recommended refusal on insufficient information on Highway Grounds but has deemed consent. However, the highway matters have been considered under this application, (see section 8).

3. Proposal

3.1 The proposed development is intended to create a single expanded farm complex consisting of livestock (cattle) housing, grain handling and storage, agricultural storage (i.e. machinery and fertilizer etc.) and forage storage. The submitted Planning Statement advises that it is applicant's intention that the development proposed will facilitate the concentration of both arable and livestock farming at Lford farm to improve efficiency.

3.2 The development proposed at Lford Farm consists of;

- Three Cattle Yard Buildings (in addition to the two already existing on site) (30.3m x 15m)
- Isolation Cattle Yard Building (15m x 30.3m)
- Straw Barn (30m x 21.3m)
- Silage Clamp (36 x 23m)
- Sprayer and Solid Fertiliser Store (36m x 23m)
- Machine Shed (16m x 48m)
- Machine Shed and Welfare Building (16m by 30m)

3.3 The construction of a new access onto Piddinghoe Road, (C7), and access track to farm.

3.4 The raising of land levels with imported fill to form a level farm yard area that the cattle can cross through. The remaining paddock is the proposed to be levelled out with a downward slope to the eastern boundary of the site.

4. Consultations

4.1 **Iford Parish Council:** No comments:

4.2 **Archaeology:** No objection.

4.3 **Conservation Officer:** No objection, supportive of proposal with regard to reduction in farm vehicles travelling through conservation area.

4.4 **Dark Night Skies Officer:** No Objection subject to condition requiring internal and external lighting details.

4.5 **Design:** No major issues to raise in terms of design quality, or climate change and sustainable use of materials.

4.6 **Ecology:** No comments

4.7 **Environment Agency:** No objection subject to conditions with regard to drainage and land contamination.

4.8 **Highways:** No objection following the submission of additional highway information document subject to conditions.

4.9 **Landscape:** No objection subject to condition with regard to materials.

4.10 **Natural England:** No comments

4.11 **Planning Policy:** No objection following the submission of revised Ecosystem Services Statement and updated layout plan.

4.12 **Rights of Way** – Comments provided through the Highways consultee; the proposals involve the use of larger vehicles for transportation, in order to encourage cyclists to use Egrets Way as an alternative route to the C7 it is recommended that the section of Egrets way that currently passes through land in the applicants control be upgraded and surfaced. At present the field route does not lend itself to cycling. It would be beneficial to secure a contribution as part of this development. Discussions should take place between the applicant and LPA as to the scale required.

Officer comment – Refer to Section 8, Public Right of Way section.

4.13 **Southern Water:** No objection, subject to consultation with the Environment Agency and that drainage details are conditioned.

4.14 **Whole Estate Plan Team Comments:** No objection, following the submission of the additional information submitted to support the proposals contribution to ecosystem services and the Iford WEP. These are both helpful and are considered to demonstrate clearly the additional benefits the proposed scheme will deliver. The benefits specific to the Iford WEP outcomes are;

- Principle of farm consolidation, increasing the longevity of the enterprise.
- Ability to demonstrate direct public goods from land management.
- Creation of further habitats, including meadow, wetland and reed beds,
- Preservation and enhancement of Iford village character.

It is understood that ESCC Highways Authority have requested a contribution to enhanced cycle network provision within the Estate boundary. A specific project, the scope of which should be identified by the applicant and agreed by the case officer, to deliver or enable enhanced access and appreciation of the wider landscape, is considered to relate directly to the scheme and would deliver further priorities identified in the WEP. As such, this would be supported.

5. Representations

5.1 Letter of objection from Friends of the South Downs Society,;

- The drawings are inadequate, existing and proposed development combined on a single plan. There are a significant number of unauthorised uses and possible enforcement issues around Iford and Swanborough, this application should not be decided with these matters outstanding.
- Serious doubts whether all the proposals in the WEP are in compliance with the policies of the Local Plan and about the status of WEPs in the planning process. The application proposal is for a considerable extension of the present farm complex onto adjoining greenfield land. It will result in a substantial number of agricultural sites and buildings elsewhere in the estate becoming redundant; the WEP presupposes that these will all be converted or redeveloped for commercial and residential uses. If necessary, these sites should be covered by parallel planning applications and linked through a s106 agreement. The application needs to be considered against the Local Plan in this wider context, specifically SD39.
- Visual impact - levelling the site, raising the ground level at the eastern end by up to 2.5 metres. Formation of a large cluster of unattractive functional buildings and concreted yards.
- Some tree planting if proposed around the north, west and south sides of the site, but none to the east. As there are high viewpoints on the Downs, there should be screening on this side too.
- C7 is unsuitable road for heavy HGV traffic. The junction should be designed in keeping with the guidance of the publication 'Roads in the South Downs' 2015.

5.2 **Seventy two letters of objection were received prior to completion of this report at 14:00hrs on 6 May 2020. Any further objections will be recorded on an update sheet:**

- Direction of water collecting along the southern boundary to a location to the west of the site is required.
- The amalgamation of farm buildings into one place will look like an industrial estate rather than a farm. The existing large barn has already ruined the view/aspect from the south and east.
- Detrimental impact on the amenities of the occupiers of the adjacent dwellings due to the intensification of the site.
- Detrimental impact on landscape including views from adjacent PRow network.

- Detrimental impact of additional traffic through Lewes Conservation Area
- Will cause noise and air pollution issues
- Concerns that the application is for a cement warehouse
- Residents homes are right on the road and many windows will be lower than the height of these vehicles denying homes of the right to natural light during daylight hours.
- Development is not sustainable in terms of construction and CO2 emissions.
- The centralisation of these operations will lead to Highway Safety and traffic congestion issues on the C7 and surrounding road network.
- The width and splayed nature of the proposed junction will not be consistent with the existing rural nature of the road.
- The existing gate in front of 1 & 2 Lower Stalls Cottages is not shown on the site map. Request that the existing gate is referred to in the planning permission, and shown on the site plan and prohibit all non-residential traffic (excluding emergency services)
- The planning permission should contain a condition that the new road is for all the traffic using the site, including the business units.
- The potential use of the 'passageway' between Lower Stalls Cottages and the existing buildings being used as a short-cut from the new access road to the business units and the rest of the farm operations. Request that a condition requiring the passageway to be blocked off and the storage of any materials in that area be prohibited.

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 South Downs Local Plan (2014-33). The relevant policies are set out in section 7 below.

National Park Purposes

- 6.2 The two statutory purposes of the SDNP designation are:
- To conserve and enhance the natural beauty, wildlife and cultural heritage of their areas;
 - To promote opportunities for the public understanding and enjoyment of the special qualities of their areas.

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

National Planning Policy Framework and Circular 2010

- 6.3 Government policy relating to National Parks is set out in English National Parks and the Broads: UK Government Vision and Circular 2010 and the revised National Planning Policy Framework (NPPF) issued in July 2018 and further amended in February 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.

Relationship of the Development Plan to the NPPF and Circular 2010

- 6.4 The development plan policies listed below have been assessed against the NPPF and are considered to be compliant with it.

Statutory Requirements

6.5 The Planning (Listed Buildings and Conservation Areas) Act 1990 places a series of duties on planning authorities when determining planning applications for planning permission that may affect listed buildings or their setting.

6.6 Section 66 (1) states that ‘in considering whether to grant planning permission for development which affects a listed building or its setting the local planning authority ‘shall have special regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses’

The South Downs National Park Partnership Management Plan

6.7 The South Downs National Park Partnership Management Plan 2020-25 is a material consideration in the determination of the application. The following policies are relevant:

- 1: Conserve and enhance natural beauty and special qualities of the landscape;
- 3: Protect and enhance tranquillity and dark night skies;
- 4: Create more, bigger, better-managed and connected areas of habitat in and around the National Park, which deliver multiple benefits for people and wildlife;
- 5: Conserve and enhance populations of priority species;
- 9: The significance of the historic environment is protected from harm, new discoveries are sought and opportunities to reveal its significance are exploited;
- 12: Support conservation grazing on semi-natural habitats as part of a profitable livestock and mixed farm economy;
- 13: Support the financial viability of farm businesses through appropriate infrastructure and diversification developments, in particular, encouraging those that will support sustainable farming;
- 55: Promote opportunities for diversified economic activity in the National Park, in particular, where it enhances the special qualities.

7. Planning Policy

The South Downs National Park Local Plan (2014-33)

7.1 The following policies of the South Downs Local Plan are relevant:

- SD1: Sustainable Development
- SD2: Ecosystems Services
- SD3 Major Development
- SD4: Landscape Character
- SD5: Design
- SD6: Safeguarding Views
- SD8: Dark Night Skies
- SD9: Biodiversity and Geodiversity
- SD10: International Sites
- SD11: Trees, Woodland and Hedgerows
- SD13: Listed Buildings
- SD15: Conservation Areas
- SD17: Protection of the Water Environment
- SD19: Transport and Accessibility
- SD20 Walking, Cycling and Equestrian Routes
- SD21: Public Realm, Highway Design and Public Art
- SD25: Development Strategy
- SD39 Agriculture and Forestry
- SD48: Climate Change and Sustainable Use of Resources

- SD50: Sustainable Drainage Systems
- SD54: Pollution and Air Quality
- SD55: Contaminated Land

8. Planning Assessment

Principle of development – Major Development

- 8.1 Determining whether proposals are major development in terms of paragraph 172 of the NPPF is a matter of planning judgement to be decided by the decision maker, based on all the circumstances relevant to the proposals and the context of the application site.
- 8.2 Following Counsel's advice to the SDNPA by James Maurici QC in 2014, it is concluded that the development is not major development for the purposes of paragraph 172 of the National Planning Policy Framework (NPPF). Accordingly exceptional circumstances do not need to be demonstrated.
- 8.3 Therefore the main considerations are:
- a) Principle of Development and Agricultural Justification
 - b) Landscape and Visual Impact
 - c) Impact on Conservation Area
 - d) Drainage and Water Environment
 - e) Biodiversity, Ecology and Ecosystem Services
 - f) Impact on Surrounding Residential Amenities
 - g) Highways, Access and Traffic
 - h) Public Rights of Way
 - i) Dark Night Skies

Principle of Development and Agricultural Justification

- 8.4 The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. There are three dimensions to sustainable development: economic, social and environmental.
- 8.5 The farm is a mixed arable and livestock operation. Forming a total of 1,500ha of land, 940ha of which is arable land with the remaining land utilised for mixed arable and livestock. The farm has a livestock to include 300 suckler cows between 18/24 months.
- 8.6 The proposal is considered to be capable of compliance with policy SD39 (Agriculture and Forestry) of the South Downs Local Plan (SDLP). This policy supports sustainable development and proposals for new agricultural buildings where there is a need and when appropriate measures have been undertaken to ensure development does not have an adverse impact on the locality. Policy SD25, (Development Strategy), allows for development outside of the settlement boundary when there is an essential need for a countryside location. Supporting mixed farming, recognising the value livestock play in landscape management is part of the general thrust of the Local Plan.
- 8.7 In support of the economic sustainability of the proposal, an Agricultural Justification Statement has been submitted with this application to demonstrate the principle of the development and the need. The farm currently operates from three yards, Iford Farm, The Old Sheep Yard and the Youngstock Barn, (also known as Upper Stalls) and Swanborough Farm. The submitted Statement considers the limitations of the three sites and the buildings therein and concludes that the consolidation of farm operations to provide a new farm complex at Iford Farm would overcome the materials constraints of the current disparate operation in terms of the time and cost of operations and providing facilities that are suitable for modern agricultural needs at one location within the Estate.
- 8.8 Representations submitted have raised the question about what the alternative uses of the redundant buildings will be if the farm operation is consolidated at Iford Farm. The applicant

has advised that in the medium term the buildings will be utilised for farm storage but that future intention will be the re-development of the sites. Although there is no detail to be considered at this stage it is expected any proposals will have regard to Planning Policies and the aspirations within the WEP. However, these future plans will require individual planning applications and is outside the scope of the consideration of this planning application. This is usual.

- 8.9 It is considered that this proposal is not only acceptable, in principle, as farm related development is concerned, but takes the opportunity to address some of the desirable outcomes of the WEP. WEPs are supported by SDLP policy SD25 which recognises the benefit of looking at Estates in their wider context when considering an individual application. A WEP is therefore a material consideration. The outcomes of the Iford WEP that are specific to this proposal are; principle of farm consolidation and maintenance of diverse farming, increasing the longevity of the enterprise, ability to demonstrate direct public goods from land management, creation of further habitats, including meadow, wetland and reed beds and the preservation and enhancement of Iford village character.
- 8.10 Furthermore, it is acknowledged that the landscape of the South Downs has been shaped by traditional farming over many generations, and that the farming continues to contribute to the landscape character, biodiversity and ecosystem services intrinsic to the National Park. Policy 13 of the South Downs Partnership Management Plan (2020-25) (SDPMP) states the SDNPA's support for the financial viability business through appropriate infrastructure.
- 8.11 In summary, it is concluded through assessment of the application documents submitted that there is justification for the proposal and that there is overarching policy support for the principle of the consolidation of the farm buildings at the Iford Farm site.

Landscape and Visual impact

- 8.12 The environmental aspect of sustainable agricultural development requires the consideration of its landscape impact. The proposed barns, silage clamp, with associated land raising and new access and farm track have two main visual impacts; those of distant views and those closer to.
- 8.13 Policy SD04, (Landscape Character) supports development that is informed by landscape character, that conserves and enhances the existing landscape features which contribute to the distinctive character, pattern and evolution of the landscape; and safeguards the experiential and amenity qualities of the landscape. Policy SD05, (Design), supports the development that demonstrates landscape-led design approach and respects local character. Proposals should both integrate with, respect and sympathetically complement character and utilise architectural design which is appropriate and sympathetic to its setting. Proposals should also incorporate hard and soft landscape treatment which takes opportunities to connect wider landscaper and enhance green infrastructure. Policy SD06 (Safeguarding Views) supports development that conserves and enhances views from publically accessible areas within, into and out from settlements which contribute to the viewers enjoyment of the National Park, and views from public rights of way, open access land and other publically accessible areas.
- 8.14 In regard to the development proposed at Iford Farm, the applicant entered into pre-application discussions to seek officer advice on reducing the impact of both close to and distant views. The changes in the layout of the scheme that have evolved from pre-application discussions was the understanding by the applicant of the need to approach any future proposal as a landscape led scheme.
- 8.15 Accordingly, a Landscape Visual Impact Assessment (LVIA) has been submitted to support the landscape led approach to the development now taken. One of the key changes in layout from the scheme submitted at pre-application stage is the siting of the new buildings to the eastern and western sides of the site, such that the open views from the north east are maintained through the site. Rather than the intrusion from long range views that would have been created by individual buildings placed more centrally within the site.

- 8.16 One of the officer concerns regarding visual appearance was how the proposed land raising and resulting height of the proposed additional cattle barns and straw barn would impact views of the site. In order to enable a robust assessment of this impact, the applicant commission a wireframe plan from the south eastern aspect. On review of this plan, it can be appreciated that the proposal will sit well in relation to the existing buildings within the site and an unacceptable level of dominance of the additional buildings will not be observed from close to and wider views of the site. Additional and sensitive planting will further assist to break up the building form along the south eastern boundary.
- 8.17 It is considered that the development within the farm will accord with the existing character of the site and that the benefits from the consolidated farm operation outweigh any changes to the wider visual impact of the proposals. A planning condition will be required to control final land levels and to ensure that the works to re-grade the field are carried out concurrently with the farm construction works in order to achieve a satisfactory scheme.
- 8.18 The other aspect of the scheme that will have a visual impact is the proposed access and farm track. Concerns have been made through representations submitted in respect of this application that the access and associated farm track will have an unacceptable urbanisation impact on the immediate and wider views of the site. It is accepted that the new access and track will have a visual impact. However, the applicant has successfully demonstrated to the satisfaction of the Highway Authority that lesser splays can be achieved safely than those generally required by the Highway Authority and the benefits gained to the amenities of the adjacent Iford Conservation Area are considered to dramatically outweigh the impact of the new track.
- 8.19 To ensure an acceptable development is achieved onsite, all planting and hard surfacing proposed must be considered in detail through the submission of information to address landscape conditions and should be managed in the future through the submission of an acceptable Landscape and Ecological Management Plan, (LEMP).
- 8.20 In summary, it is concluded that the development changes to the agricultural yard and access track are acceptable in terms of design and landscape impact.

Impact on Conservation Area

- 8.21 The Iford Conservation Area is located adjacent to the application site and includes a number of listed buildings. There is a small area within the application redline to the west of the farm yard where it extends into the conservation area. However, the main areas of development sit within the section of the site outside of the Iford CA.
- 8.22 One of the advantages of the proposed scheme is considered to be the benefit to the Iford CA. Currently the main route for farm traffic is through the narrow roads of Iford village. The application is supported by a Heritage Statement which concludes that, by removing as much traffic and inappropriate activities from the historic parts of the village as possible, it will result in a significant improvement to the wider conservation area and the setting of listed buildings. A conclusion with which the SDNPA's Conservation Officer concurs.
- 8.23 A further proposed enhancement to the western side of the site adjacent to the conservation area is proposed; by removing the existing hardstanding that is utilised for storage and returning it to fields it will provide a visual betterment to the appearance of the farm yard from the conservation area.
- 8.24 Accordingly it is considered that the proposed scheme accords with policy SD12 (historic environment) and paragraph 200 of the NPPF.

Drainage and Water Environment

- 8.25 Policies SD49, (Flood Risk Management), SD17, (Protection of the Water Environment) and SD55 (Contaminated Land) are engaged for the proposed development at this site. The superficial geology beneath this site is River Terrace Deposits and Head deposits and the bedrock is the West Melbury Marly Chalk Formation. It does not lie within a Source Protection Zone, but the chalk bedrock is designated as a Principal Aquifer and there are a number of surface water features. The Environment Agency have advised that the existing use of the site as agricultural land presents a medium risk of contamination that could be

mobilised during construction to pollute controlled waters. Therefore, controlled waters are very sensitive in this location and need to be protected and the Environment Agency have responded with no objection to the scheme so long as further information is sought from the applicant at post application stage. The submitted FRA is considered to be acceptable.

- 8.26 In summary, with suitably worded conditions, it is considered that this proposal in line with paragraph 170 of the NPPF and policies SD49, SD17 and SD55 of the SDLP with regard to impact of the scheme on the water environment.

Biodiversity, Ecology and Ecosystem Services

- 8.27 Paragraph 175 of the NPPF requires that if significant harm is brought to biodiversity resulting from development that cannot be avoided, mitigated or compensated for, planning permission will be refused. Policy SD09 (Biodiversity and Geodiversity) of the SDLP goes further and requires that biodiversity is enhanced. The application as submitted was supported by a Preliminary Ecological Appraisal and Bat Building Assessment that identified further reptiles surveys were required. It is necessary to condition accordance with the survey reports. Given the current operational nature of the site, it is considered that so long as the recommendations of the survey works undertaken and are adhered to, then the scheme is acceptable in regard to the impact to ecology. The further enhancements required to biodiversity are considered within the submitted Ecosystem Services Statement.

- 8.28 Part 118 of the NPPF draws attention to the duty to protect the natural environment and to the opportunities for its enhancement. The relevant policy of the SDLP is SD02 (Ecosystem Services). SD02 states that development proposals will be permitted where they have an overall positive impact on the ability of the natural environment to contribute to goods and services. It was considered by officers that the initial Ecosystems Services Statement (ESS), did not sufficiently address matters, or the outcomes of the Iford WEP, within the application proposals. Further work has been undertaken by the applicant and a revised layout and ESS have been submitted that better addresses the opportunities for Ecosystem Services gains within the site and better aligns with the outcomes of the WEP. It is considered that the updated scheme better demonstrates direct public goods from land management and now provides for the creation of further habitats, including meadow, wetland and reed beds. Other biodiversity benefits include, bird and bat boxes, deadwood habitat piles and flowering plant species.

Impact on Surrounding Residential Amenities

- 8.29 The social aspect of sustainable development requires that decision makers must take account of the impact of proposed development, amongst wider issues, on the amenities of the occupiers of surrounding dwellings. To this regard it is considered that the new access track and farm track will move a significant volume of vehicular trips to and from the site away from the adjacent residential dwellings to the west of the site. Furthermore, the applicant has agreed to retain the existing gate to the access in front of Lower Stalls Cottages and install a further gate to the existing access directly adjacent. Whilst the gates are not intended to discourage all access to the site, they will ensure that the new access is a much more accessible and convenient entrance to the site except perhaps for those employees who live within Iford village, for whom the existing accesses may still be utilised.
- 8.30 It is not considered that the consolidation of the operations within the site will detriment the amenities of the occupiers of the adjacent dwellings to such an extent to warrant a refusal of the application. As this is already a working farm and the use of which will remain unchanged albeit intensified.
- 8.31 Representations received from residents have requested that the cut way adjacent to the existing buildings of the site and Lower Stalls Cottages is blocked off. However, it is not considered that this would meet the tests of necessity and reasonableness of planning conditions or that can be directly related to the development proposed.
- 8.32 It is concluded that the proposed scheme will accord with the requirements of policy SD05 in terms of the impact on the surrounding residential amenities and that the scheme is acceptable in planning terms to this regard.

Highways, Access and Traffic

- 8.33 The Highway Authority raised initial concerns concerning the information submitted with the application. They considered that it was insufficient information to conclude that the scheme would not have an adverse impact on the grounds of the other uses on the site in regard to recent planning consents, that a road safety audit needed to be undertaken to ensure that the proposed access is suitable and safe and that further details of parking and turning onsite were required.
- 8.34 Following the submission of the additional information, the Highway Authority have confirmed that they have no objection to the proposed access, on-site turning and parking arrangements. Following additional highway information received on the 27 March 2020 from the applicant, the Highway Authority has confirmed that, as this application does not directly increase the level of traffic movements on the surrounding highway network and given that it is farm consolidation, they raise no objection to the scheme on highway safety grounds. However, their consultation response does take into account the additional movements that stem from a previous prior approval and planning consent (see site history). Also, in terms of access, the application will use a purpose made one rather than the less than ideal historic route which takes farm traffic through the Iford Conservation Area. The new access is up to modern standard and the route avoids the historic village.
- 8.35 Accordingly it is considered that subject to appropriate planning conditions that the proposed access arrangements and site layout are acceptable in Highway, access and traffic terms and that the scheme is in accordance with the requirements of SDLP policies SD19, (Transport and Accessibility) and SD05 (Design). Whilst the new access may not be in full accordance with Roads in the South Downs (2015), it is considered that the great benefits to Iford CA outweigh in terms of traffic reduction must be held in balance and that to this regard the proposal is considered to be acceptable.

Public Rights of Way

- 8.36 Policy SD20, (Walking, Cycling and Equestrian Routes), requires that new developments maintain existing rights of way; and conserve and enhance the amenity value and tranquillity of , and views from, non-motorised travel routes and access land. There is a public right of way that transverses the proposed farm access track. This PRoW runs across two of the farm's lower fields adjacent to the C7 (Piddinghoe Road). The Highways response raises no concerns with regard to impact of users of this footpath if suitably worded conditions are attached to a planning consent.
- 8.37 In so long as suitable planting is incorporated into the scheme and suitable surfacing is utilised for the access track, it is not considered that the scheme will create an unacceptable visual impact for the users of the adjacent PRoW network and that the views from the surrounding network will remain that of an active farm operation. Furthermore, the public footpaths through the village of Iford will be enhanced through the reduction of farm vehicles through the Conservation Area.
- 8.38 The SDNPA Whole Estate Plan team and ESCC highways/PRoW team have made comments with regard to a contribution/ commitment from the applicant to upgrade the cycle network, with ESCC specifically suggesting Egrets Way. However, it is considered that a financial contribution could be complex to justify in the absence of a worked up scheme and ESCC do not have a policy basis for calculating the amount of contribution required. Other work in terms of starting to meet this outcome of the WEP has already been undertaken with regard to footpaths across the east of the Iford Estate, particularly the commitment to a permissive bridleway, through the Estate between Iford Village and Rise Farm and also the gains in terms of a link to the Egrets Way at Swanborough Lodges.
- 8.39 Notwithstanding part of the Iford Whole Estate Plan, is to "encourage wider access and appreciation of the high quality landscapes on the Iford Estate". The Egret's way is a key route that runs through the Estate and views from the new development to it will be altered. Given the scale and significance of the application under consideration, the impact of the scheme in terms of development in this location that it visible from both close to and wider views, it is considered appropriate and proportionate that an undertaking is

completed to mitigate the impacts on the National Park. This is not only a statement of the WEP but is considered appropriate to accord with the first purpose of the National Park, the duty to conserve and enhance the natural beauty of the National Park. It would also meet the second purpose, to promote and understanding and enjoyment of the Park.

- 8.40 It is therefore considered proportionate and reasonable in the context of Purpose 1 and the WEP which is a material consideration, to require that the section of The Ouse Valley Way footpath, (this lies adjacent to the route that has been identified as future the Egrets Way link), to be upgraded and, if acceptable to ESCC PRow team, dedicated as a bridleway to allow better access by cyclists. This can be secured through an appropriately worded planning condition. This could result in the dedication of nearly 6km of new bridleway and demonstrates the Estate's commitment to working with the SDNPA to enable the completion of the Egrets Way route in the future. It is further suggested that the proposed footpath upgrade to bridleway of the lford/Lewes link, (already under negotiation with the applicant and ESCC), be secured by planning condition attached to this consent.

Dark night skies

- 8.41 The site is located within the Transition Zone (E1b) and a lighting assessment has been submitted to support the application. Policy SD08 of the SDLP requires that development does not harm the quality of dark night skies of the National Park, for the benefit of people and wildlife. In consideration of this the applicant has sought to minimise light spill from the site by minimising additional external lighting, PIR sensors fitted to all new external lighting and minimise all internal lights to buildings. Given the higher relative contrast of lighting in rural areas, it will be important that any bright lights (above 5000 lumens) are mitigated sufficiently. To this regard it is considered necessary to impose a planning condition to require details of the external and internal lighting to be submitted to and approved by the SDNPA.

9. Conclusion

- 9.1 Given the above, it is considered that the proposal is in accordance with the Development Plan and there are no overriding material considerations to otherwise indicate that permission should not be granted. The scheme ensures supports the future of the farming operation and enables conservation and biodiversity enhancements to be delivered. It is therefore recommended that planning permission is granted subject the conditions listed in section 10 of this report in order to meet the requirements of the lford WEP, SD25 and the purpose (1) of the National Park.

10. Reason for Recommendation

- 10.1 The application is recommended for approval subject to the following conditions:

Timescale

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) and Section 51 of the Planning and Compulsory Purchase Act 2004.

Accordance with Plans

2. The development hereby permitted shall be carried out strictly in accordance with the approved plans unless otherwise agreed in writing by the Local Planning Authority.

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

Material details

3. Prior to construction above slab level a schedule and samples of external materials and finishes to be used in the construction of the buildings hereby approved, and any associated hard-surfaces, shall have been submitted to and approved in writing by the Local Planning Authority. The development shall only be carried out strictly in accordance with the approved details.

Reason: In the interests of landscape and visual amenity of the area

Levels and Datum Point

4. The development hereby approved shall be carried in accordance with the proposed levels plan and section drawings hereby approved, so that re-leveling of the field within which the development is situated, is carried out concurrent with the construction of the additional farm buildings and silage clamp hereby approved. There shall be no further increase in levels above those shown unless the Local Planning Authority gives prior written approval for such changes.

Reason: To ensure concurrent re-grading so that the development is blended into existing topography in the interests of the visual amenity of the area.

5. Prior to the commencement of the development hereby permitted details of earthworks shall be submitted to and approved in writing by the Local Planning Authority. These details shall include:
 - i) The proposed grading and mounding of land area including the levels and contours to be formed, showing the relationship of proposed mounding to existing vegetation and surrounding landform in relation to a nearby datum point;
 - ii) The volume of cut/fill material;
 - iii) Where surplus material may be placed on site, or alternatively proposals for removing and distributing the soil resource from site.

Development shall be carried out in full accordance with the approved details.

Reason: To ensure a satisfactory development and in the interests of amenity and landscape character.

Highways and Access

6. The development shall not commence until details of the layout of the new access and the specification for the construction of the access which shall include drainage have been submitted to and approved in writing by the Planning Authority and the development not be occupied until the construction of the access has been completed in accordance with the agreed specification.

Reason: To ensure the safety of persons and vehicles entering and leaving the access and proceeding along the highway.

7. No development shall be occupied until a gate has been installed at the existing access shown on the submitted plan (Plan no PVRU390700IF_302M). The existing gate across the site entrance adjacent to Lower Stalls Cottages shall be retained. Thereafter both gates must remain installed as approved across both site accesses.

Reason: To ensure the safety of persons and vehicles entering and leaving the access and proceeding along the highway.

8. The access shall not be used until the visibility splays shown on the submitted plan (plan no PVRU390700IF_301H) are cleared of all obstructions exceeding 600 mm in height and kept clear thereafter.

Reason: To ensure the safety of persons and vehicles entering and leaving the access and proceeding along the highway.

9. The development shall not be occupied until a parking area has been provided in accordance with the details which have been submitted to and approved in writing by the Local Planning Authority and the area shall thereafter be retained for that use and shall not be used other than for the parking of motor vehicles

Reason: To ensure the safety of persons and vehicles entering and leaving the access and proceeding along the highway.

10. The development shall not be occupied until a turning space for vehicles has been provided and constructed in accordance with the submitted plan (Plan no

PWRU390700IF_302M) and the turning space shall thereafter be retained for that use and shall not be used for any other purpose.

Reason: To ensure the safety of persons and vehicles entering and leaving the access and proceeding along the highway.

11. The development shall not commence until revised plans and details incorporating the recommendations given in the Stage I Road Safety Audit and accepted in the Designers Response have been submitted to and approved in writing by the Local Planning Authority. Thereafter, the development shall be constructed in accordance with the approved details.

Reason: In the interests of road safety.

12. Prior to the commencement of development details of the proposed surface water drainage to prevent the discharge of surface water from the proposed site onto the public highway and, similarly, to prevent the discharge of surface water from the highway onto the site shall be submitted to and approved in writing by the Local Planning Authority. Thereafter, the development shall be constructed and implemented in accordance with the approved details.

Reason: To ensure the appropriate management of surface water on and adjacent to the highway and prevent an increased risk of flooding.

13. The completed access shall have maximum gradients of 2.5% (1 in 40) from the channel line and 11% (1 in 9) thereafter

Reason: To ensure the safety of persons and vehicles entering and leaving the access and proceeding along the highway.

14. Prior to the commencement of development details of the proposed signage shall be submitted to and approved in writing by the Local Planning Authority. Once approved The signage should be erected and maintained at a minimum of 450mm back from the edge of the adjacent carriageway, in order to provide adequate clearance from any overhang of passing vehicles.

Reason: To ensure the safety of persons and vehicles proceeding along the highway.

15. Public Footpath Iford Id should remain unobstructed during and on completion of the development

Reason: To ensure the safety of persons proceeding along the public footpath.

16. No development shall take place, including any ground works or 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 in full throughout the entire construction period. The Plan shall provide details as appropriate but not be restricted to the following matters:

- the anticipated number, frequency and types of vehicles used during construction,
- the method of access and egress and routeing 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 and utilisation of wheel washing facilities and other works required to mitigate the impact of construction upon the public highway (including the provision of temporary Traffic Regulation Orders),
- details of public engagement both prior to and during construction works.

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

Drainage

17. The development shall be carried out in accordance with the submitted Flood Risk Assessment (Ref 7187, May 2018) and the mitigation measures detailed within and shall incorporate the measures further detailed in the Ecosystems Services Statement (dated February 2020). These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/phasing arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

Reason: To ensure that flood risk is managed

Development on land affected by contamination

18. No development approved by this planning permission shall commence until a remediation strategy to deal with the risks associated with contamination of the site in respect of the development hereby permitted, has been submitted to, and approved in writing by, the Local Planning Authority. This strategy will include the following components:

- i) A preliminary risk assessment which has identified:
 - a. all previous uses;
 - b. Potential contaminants associated with those uses;
 - c. a conceptual model of the site indicating sources, pathways and receptors; and
 - d. potentially unacceptable risks arising from contamination at the site.
- ii) A site investigation scheme, based on (i) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off-site.
- iii) The results of the site investigation and the detailed risk assessment referred to in (ii) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
- iv) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (iii) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the written consent of the Local Planning Authority. The scheme shall be implemented as approved.

Reason: To ensure that the development does not contribute to, or is not put at unacceptable risk from/adversely affected by, unacceptable levels of water pollution.

Verification report

19. Prior to any part of the permitted development being brought into use, a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and approved in writing, by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Reason: To ensure that the site does not pose any further risk to human health or the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete.

Previously unidentified contamination

20. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this

contamination will be dealt with has been submitted to, and approved in writing by, the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reason: To ensure that the development does not contribute to, is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site.

SuDS Infiltration of surface water into ground

21. No drainage systems for the infiltration of surface water to the ground are permitted other than with the written consent of the Local Planning Authority. Any proposals for such systems must be supported by an assessment of the risks to controlled waters. The development must be carried out in accordance with the approved details.

Reason: To ensure that the development does not contribute to, is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants.

Landscaping, Ecology and Trees

22. Prior to the commencement of the development hereby permitted, a detailed scheme of soft landscaping works shall be submitted to and approved in writing by the Local Planning Authority. All such works as may be approved shall then be fully implemented in accordance with the approved development. The scheme shall include details of:

- i) Proposed planting plans and strategy, including written specifications, cultivation and other operations associated with plant, grass, shrub and tree establishment; schedules of plants and trees noting species, sizes; and proposed numbers/densities where appropriate;
- ii) Tree guards, staking and tree-pit construction;
- iii) Retained areas of grassland cover, scrub, hedgerow, and trees;
- iv) A timetable for implementation of the soft landscaping works.
- v) A schedule of landscape maintenance for a minimum period of 5 years to include details of the arrangements for its implementation.

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

23. All soft landscaping shall be carried out in the first planting and seeding season following the bringing into use of the proposed farm buildings, 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.

Reason: To achieve an appropriate landscaping scheme to integrate the development into the landscape.

24. Works shall be carried out in full accordance with the ecological mitigation and enhancement measures as set out in Section 6 “Recommendations” of the submitted ARB894: Preliminary Ecological Appraisal and Bat Building Assessment, Section 6 “Recommendations” of the ARB894 Reptile Survey Report and the Ecosystems Services Statement (dated February 2020).

Reason: to protect reptiles and other notable species in accordance with the Wildlife and Countryside Act 1981 (as amended).

25. Prior to development above slab level, a Landscape and Ecological Management Plan (LEMP), shall be submitted to and approved in writing by the Local Planning Authority. The content of the LEMP shall include the following:

- a) A description, plan and evaluation of landscape and ecological features to be managed including the water features and ditches, grassland and hedgerows;
- b) Measures setting out how the development will:
 - i) Conserve water resources and improve water quality;
 - ii) Protect and provide more, better and joined up natural habitats;
 - iii) Improve the National Park's resilience to, and mitigation of, climate change;
 - iv) Increase the ability to store carbon;
 - v) Conserve and enhance soils.
- c) Ecological trends and constraints on site that might influence management;
- d) Details of future management of both areas for habitats and species, including details of management responsibility;
- e) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period);
- f) A scheme of ongoing monitoring, and remedial measures where appropriate;

The approved LEMP will be implemented in full accordance with the approved details, unless otherwise agreed by the Local Planning Authority. Where deemed necessary by the Local Planning Authority shall include contingencies and/or remedial action to be further agreed and implemented where the results from monitoring show that conservation aims and objectives of the LEMP are not being met.

Reason: To achieve an appropriate landscaping scheme which will contribute to the setting of the development and the surrounding character and appearance of the area, and secure ecological mitigation measures and biodiversity net gain.

26. Prior to the commencement of the development hereby permitted details of the protection of the trees and hedgerows to be retained shall be submitted to and approved in writing by the Local Planning Authority. The measures of protection should be in accordance with BS5837:2012 and shall be retained until the completion of the development and no vehicles, plant or materials shall be driven or placed within the Root Protection zones.

Reason: In the interests of the amenity of the local area.

Lighting and Dark Night Skies

27. Prior to development above slab level, a scheme of external lighting to be installed at the site shall be submitted to, and approved in writing by the Local Planning Authority. The lighting shall:
- i) Comply with the guidance set out in the SDNPA's Dark Night Skies Technical Advice Note;
 - ii) Be designed to minimise impacts on wildlife
 - iii) Internal lighting shall Be installed as high as possible so that there is an even spread and that the lights aren't directly visible from the surroundings and greater detail provided of the internal lighting switching
 - iv) The lighting shall be installed, maintained and operated in full accordance with the approved details unless otherwise approved in writing by the Local Planning Authority.

Reason: In the interests of amenity and to protect the South Downs International Dark Skies Reserve.

28. Prior to development above slab level, a scheme shall be submitted to and approved in writing by the Local Planning Authority to upgrade two footpaths that run through land under the control of the Iford Estate. The two routes are known as the Iford/Lewes link and The Ouse Valley Way and are identified as blue and red lines on the approved plans. The approved schemes shall be fully implemented in accordance with the

approved details prior to the buildings hereby permitted being bought into use and shall be maintained to an agreed standard thereafter.

Reason: In the interests of the amenity of the local area.

Informatives

Requirement for an Environmental Permit

1. The application states that the proposal for the discharge of foul effluent is unknown. Any discharge of effluent associated with this development may require an Environmental Permit from us under the Environmental Permitting (England & Wales) Regulations 2016, unless an exemption applies. The Applicant is advised to contact us on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk for further advice and to discuss the issues likely to be raised. The Applicant should note that a permit is separate to and in addition to any planning permission granted. The granting of planning permission does not necessarily lead to the granting of a permit. Additional guidance can be found on the gov.uk website – <https://www.gov.uk/environmental-permit-check-if-you-need-one>.

Digestate and silage storage

2. The site lies on Chalk which is classified as a Principal Aquifer. Groundwater must be protected from pollution and all precautions including the design and construction of any storage lagoon must be undertaken in accordance with best practice. Silage feedstock material for the AD plant should be stored as in accordance with the SSAFO Regulations (The Water Resources (Control of Pollution) (Silage, Slurry and Agricultural Fuel Oil) (England) Regulations 2010). It is noted that the Agricultural Justification report confirms that the silage clamp will be constructed to SSAFO requirements (paragraph 5.20). The Applicant should note that in accordance with the SSAFO Regulations, we require 14 days' notice before work starts on the construction of new silo, slurry or fuel oil storage facilities, or the refurbishment of existing ones, and for purpose built on site clamps and field heaps (including "Ag Bag" structures which may be stored off site by sub-contractors/other farmers). Notification form WQE4 and further guidance on the SSAFO regulations are available on the gov.uk website - <https://www.gov.uk/guidance/storing-silage-slurry-and-agricultural-fuel-oil>, but where the NVZ Regulations are applicable this should be increased to 5 months. Rainfall should be taken into account also when calculating capacity also.

Locally Sourced Materials

3. The SDNPA encourages the use of locally sourced materials to support local character and distinctiveness, and to reduce the costs both financially and environmentally of transporting materials long distances. The applicant is recommended to undertake a resource mapping exercise for materials, starting within a 5km radius of their site, and then 10km, 25km.

Highways

4. The applicant will be required to enter into a license/agreement with East Sussex County Council, as Highway Authority, for the off-site highway works. This includes the construction of the new access. The applicant is requested to contact the Transport Development Control Team (01273 482254) to commence this process. The applicant is advised that it is an offence to undertake any works within the highway prior to the agreement being in place.
5. The applicant is advised of the requirement to enter into discussions with and obtain the necessary licenses from the Highway Authority to cover any temporary construction related works that will obstruct or affect the normal operation of the public highway prior to any works commencing. These temporary works may include, the placing of skips or other materials within the highway, the temporary closure of on-street parking bays, the imposition of temporary parking restrictions requiring a Temporary Traffic Regulation Order, the erection of hoarding or scaffolding within the limits of the highway, the provision of cranes over-sailing the highway. The applicant should contact the Transport Development Control Team (01273 482254).

11. Crime and Disorder Implication

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

12. Human Rights Implications

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

13. Equality Act 2010

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

14. Proactive Working

14.1 In reaching this decision the Local Planning Authority has worked with the applicant in a positive and proactive way, in line with the NPPF.

TIM SLANEY

Director of Planning

South Downs National Park Authority

Contact Officer: Heather Lealan

Tel: 01730 819363

email: heather.lealan@southdowns.gov.uk

Appendices I. Site Location Map

SDNPA Consultees Legal Services, Development Manager

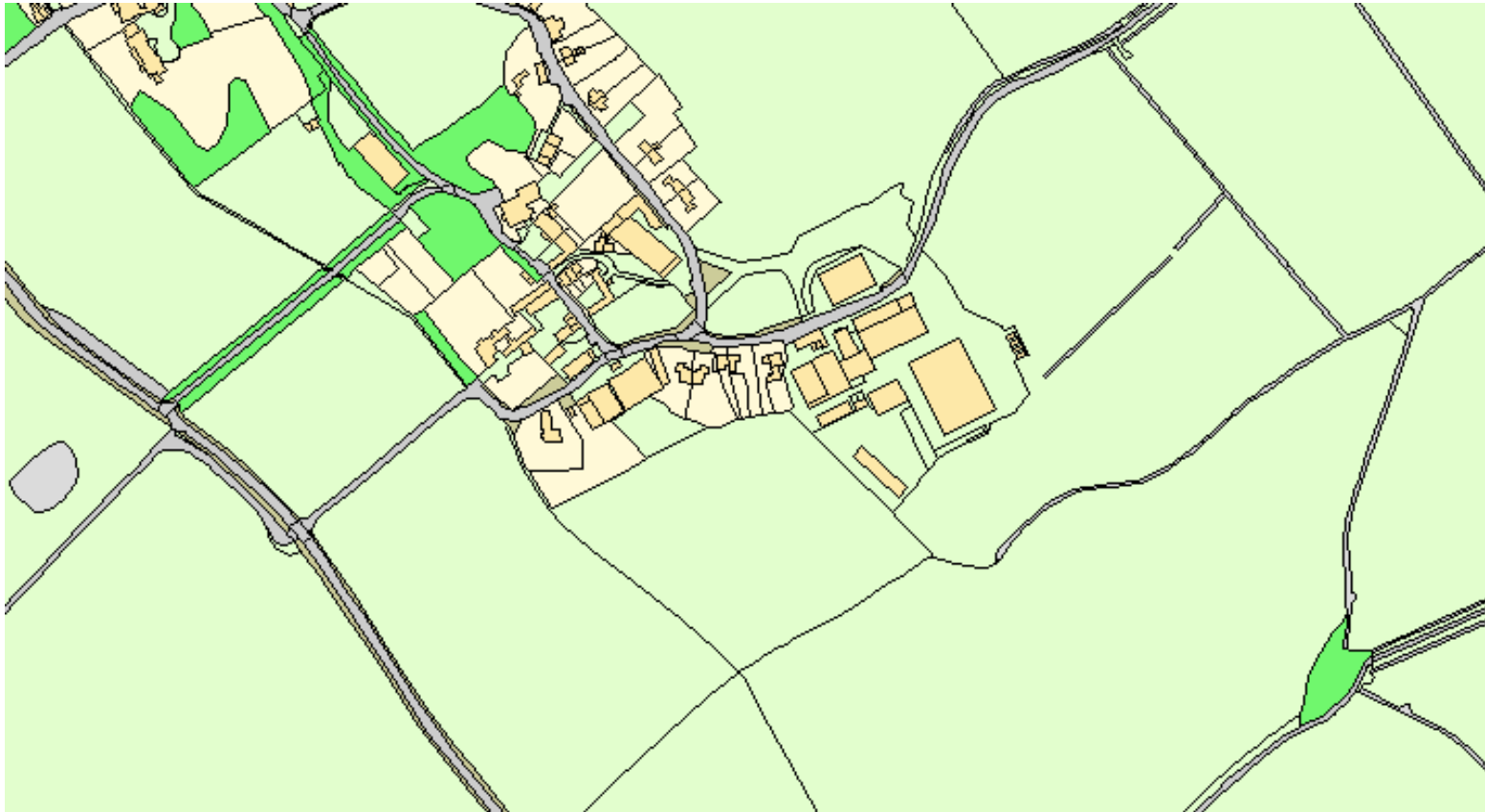
Background Documents <https://planningpublicaccess.southdowns.gov.uk/online-applications/simpleSearchResults.do?action=firstPage>
[National Planning Policy Framework \(2019\)](#)

[South Downs Local Plan \(2014-33\)](#)

[South Downs National Park Partnership Management Plan 2014](#)

[South Downs Integrated Landscape Character Assessment 2005 and 2011](#)

Site Location Map



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