

Report to	Planning Committee
Date	9 July 2020
By	Director of Planning
Local Authority	Chichester District Council
Application Number	SDNP/20/01693/FUL
Applicant	Mr Mike Ruddock
Application	Construction of 12 treehouses to provide tourism accommodation across 2 woodland sites within the estate (5 x 1 bedroom units at Lodge Wood and 7 x 1 bedroom units at High Field Copse), access and parking, cycle storage, drainage and biodiversity enhancements and woodland management.
Address	Cowdray Park, A272 Easebourne St to Heath End Lane, Easebourne, West 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 for the erection of 12 treehouses across two woodland sites within the Cowdray Estate to provide sustainable tourist accommodation within close proximity of Midhurst and public rights of way.

The application follows the refusal of a previous scheme for 10 treehouses on one of the proposed sites (Lodge Wood) due to the size and scale of development and the harm deriving from the imposition of a suburban form of development on the historic woodland character; and associated impacts on biodiversity and priority habitat (see committee report and meeting minutes appended at **Appendices 2 and 3**).

The current scheme has been subject to collaborative working between the applicant's design team and specialist officers and as a result is considered to be a fully landscape-led proposal.

The scheme would conserve and enhance the unique heritage, woodland and ecological character of each site, whilst also accruing significant benefits that would align with the Second Purpose and Duty of the National Park, including the provision of tourist accommodation, opportunities for the understanding and enjoyment of the National Park's special qualities, and benefitting the local economy.

This application is being placed before Members due to the previous scheme being refused by the Committee.

I. Site Description

- I.1 The development would be split across two areas of woodland known as Lodge Wood and High Field Copse. Both are within close distance of Midhurst and fall wholly and partially within Cowdray Park, a Grade II listed C16th historic parkland that contributes to the significance of the Grade II listed C19th house and earlier mansion, and their historic setting.
- I.2 Both sites are located within 6.5km and 12km buffer zones of The Mens, Ebernoe Common

and Singleton & Cocking Tunnels Special Areas of Conservation (SACs).

Lodge Wood

- 1.3 Lodge Wood is a 4ha area of broadleaf woodland located to the east of Cowdray House, and just south of the A272. The edge of the site is visible from the main road, and from public footpath 1109 which runs east/west towards the site before crossing the A272 north of the site.
- 1.4 Lodge Wood is located wholly within Cowdray and formed part of the original pleasure grounds with a number of rides or openings in the woodland running west-east through the woodland. The remnants of a haha (hidden ditch) runs along the western boundary of the site.
- 1.5 Cowdray House is a grade II listed building sited some 250m to the south east of the site and is primarily used for private events. Cowdray Café and Farm shop lie some 700m to the west of the site adjacent to the site of a former Priory, which now comprises a number of Grade I listed buildings including St Mary's Church and several residential units.
- 1.6 The site abuts the A272 to the north and slopes downwards from north to south, and more steeply from east to west. The site is bounded to the east by the Wellingtonia Avenue, which is part of the wider grounds of Cowdray House. To the west is an agricultural field, and beyond to the south west lie the main Cowdray polo fields.

High Field Copse

- 1.7 High Field Copse is an approximately 4.5ha sized area of replanted mixed woodland located some 1.7km to the east of Easebourne village, immediately to the east of Benbow Pond which falls within the Cowdray Park. The woodland itself lies just outside the designated parkland, however is defined as Formal Parkland and is a heritage asset in its own right that contributes to the setting of the historic parkland. A remnant stone wall on the southern boundary and historic track indicates the woodland was accessible in the past. Benbow Pond is thought to have an industrial origin supplying power to a former dyeworks.
- 1.8 To the north west of the site are a group of holiday lets owned by the Cowdray Estate, and there are a group of three dwellings approximately 100m to the south. Benbow Pond has a formal access off the A272 and an informal car park used by walkers. Permissive Estate paths leading from the car park connect with the wider public right of way network.
- 1.9 The woodland is set some 40m back from the A272 and slopes gently east to west. To the west is the John Cowdray Arboretum and beyond the Cowdray golf course. The wider landscape consists of arable fields and hedgerows, with small areas of woodland.

2. Relevant Planning History

- 2.1 The most recent planning history relating to the site is as follows:
 - SDNP/19/06164/PPA The redevelopment of land at Lodge Wood and High Field Copse. Planning Performance Agreement over the period December 2019 to May 2020.
 - SDNP/18/00643/FUL Construction of ten treehouses to provide tourism accommodation, car parking, access paths and boardwalk. Biodiversity enhancements, woodland management and landscaping across the site. Refused at Committee on 11.10.2018 for the following reasons:
 - 1) The character of the woodland site, which forms part of a registered historic parkland, would be negatively impacted by virtue of the size and scale of the proposed tree houses. The design's lack of reference to local landscape character and minimal use of local, estate-sourced materials would not conserve or enhance the character of the historic parkland setting or wider Cowdray Estate. The public benefits that would be derived from the development, and wider tourism and economic benefits, are not considered to be so significant as to outweigh the identified harm to the heritage asset. The proposal is therefore contrary to saved policies RE28, R2, T1 and T3 of the Chichester District Local Plan (1999), policies

SD4, SD5, SD12 and SD23 of the Submission South Downs (Draft) Local Plan (2018), the first Purpose of the National Park and the NPPF (2018).

- 2) Insufficient detail has been provided in regard to tree protection and the level of tree works that would be required to be certain that the character of the woodland, and woodland habitat and biodiversity would not be negatively impacted by the development or ongoing management of the woodland, given the overarching need for public safety. The proposal has not demonstrated that the development would conserve and enhance the site's woodland character, biodiversity or priority habitat. The proposal is therefore contrary to saved policy BE14 of the Chichester District Local Plan (1999), policies SD9 and SD11 of the Submission South Downs (Draft) Local Plan (2018), the first Purpose of the National Park and the NPPF (2018).
- SDNP/17/03303/PRE Construction of tree house tourism accommodation at two separate sites within the estate, use of existing access points and parking along with ecology enhancements and landscaping. Advice provided 20.06.2017

The advice stated that whilst there was no in-principle objection to the provision of tree houses on the Cowdray Estate, there were concerns in regard to the location and impact of the development; requirement for careful consideration in terms of the use of landscape character to inform the scheme, and of access and parking, materials, lighting; and more detail regarding protection of trees and construction methods. Any scheme should also maximise opportunities for conservation and enhancement such as improving footpaths and cycle ways; using local wood and telling the story of the Estate and its historic context; sustainable water management; and integrated biodiversity enhancements within the built and non-built parts of the scheme.

3. Proposal

- 3.1 The proposal follows the refusal of a previous application for 10No tree houses (8No 1 bed and 2No 2 bed) in Lodge Wood, and subsequent collaborative working with specialist SDNPA officers via a Planning Performance Agreement (PPA) to address previous concerns raised by officers and Members in regard to design, landscape, heritage and woodland impacts.

Lodge Wood Site

- 3.2 A total of 5No 1 bedroom tree houses are proposed within approximately the middle section of the woodland. Four of the units would be located to the west of the existing track running through the centre of the woodland, and one to the east, within carefully selected locations to minimise impacts on existing trees.
- 3.3 The units would be approximately 7m high with a gross internal area (GIA) of 52m² and of minimal timber frame construction (approximately 14 posts) with no diagonal braces and secured by helical steel piles. The walls would be clad in a combination of either Cedar shingle or horizontal Larch boards, and Burnt Larch boards; or vertical weathered timber with a feature habitat element. The two roof pitches would be a combination of cedar shingles and corrugated tin.
- 3.4 There are no existing services; and water, power and sewerage would be provided mainly via mole and hand dug trenches (dug and filled in consecutive 10m lengths) along the existing track through the site, and above ground through areas where tree roots are a constraint. Water would be provided via connection to the water mains, and a reed bed treatment system and septic tank would be provided for foul water. Run-off from roofs would be collected in integrated water butts and used for boot-washing, with any overflow draining as run off to avoid below-ground drainage components.
- 3.5 The Lodge Wood car park would provide 16 car parking spaces, three of which would be provided with an electric charging unit, and secure cycle storage for 10 bikes (two per unit). The car park would also provide temporary parking for visitors to High Field Copse picking up keys from Cowdray Farm Shop. Visitors would be picked up or dropped off at the site on arrival by buggy. Access between the car park and Lodge Wood would be via an existing

estate track or public footpath 1109. The existing track through the site would be extended southwards to allow pedestrian access only, and the historic rides (clearings) would be re-established. All tracks would be reinforced with earth and mulch. The southernmost unit would be wheelchair accessible.

- 3.6 Given the site's sense of seclusion and peacefulness, the applicant's vision for this site is to promote the enjoyment and experience of the site by providing units with a quiet and hidden character that visitors would wish to spend time in.

High Field Copse Site

- 3.7 A total of 7 No 1 bedroom tree houses are proposed in a compact arrangement along a new circular path incorporating an existing historic track, restricting human activity within the wider woodland.
- 3.8 The units would be approximately 7.6m high with a gross internal area (GIA) of 15m² and external deck area of approximately 17m². The units would be of minimal timber frame construction (approximately 8 posts) with no diagonal braces and secured by helical steel piles. The units would have hidden gutters, with walls and roof pitches clad in a combination of either Mixed Profile Vertical Cladding or Larch hit and miss; or weathered timber or corten steel cladding with a feature habitat element.
- 3.9 There are no existing services and water, power and sewerage would be provided mainly via mole and hand dug trenches (dug and filled in consecutive 10m lengths) along the existing/proposed track through the site, and above ground in locations where tree roots are a constraint. Water would be provided via connection to the water mains, and a sewage treatment plant with grass covering would be provided for sewage arrangements. Run-off from roofs would be collected in integrated water butts and used for boot-washing, with any overflow draining as run off to avoid below-ground drainage components.
- 3.10 A new gravelled parking area would be provided to the north of the site close to the existing holiday lets at Benbow Pond, in an area already secured by fencing and a 5-bar timber gate. 10 parking spaces would be provided, two of which would have an electric charging unit, and secure cycle storage and secure cycle storage for 14 bikes (two per unit). Pedestrian only access between the existing car park at Benbow Pond and the southern (main) entrance to High Field Copse would be provided via a new gravel surfaced path. Within the site itself a new compacted earth circular path linking with the existing historical track would be provided to access the units. The northernmost unit would be wheelchair accessible, and accessed via the existing north/south section of the proposed track which has a gentler gradient.
- 3.11 Given the site's connectivity with the wider public rights of way network and ability to link up with existing Estate tracks, the vision for this site is as a base for looking outwards and sustainably exploring the Estate and wider National Park.

4. Consultations

- 4.1 **Archaeology:** No objection, subject to condition.

- 4.2 **Countryside and Policy Manager (in lieu of Woodland & Biodiversity Officer):** No objection. Comments:

- The secondary woodland offers an opportunity to integrate the accommodation as we have seen in other areas of the SDNP;
- Management of the woodland will be carried out using a continuous cover forestry (CCF) silvicultural system under the supervision of the estate's Head Forester, ensuring long term health of the tree;
- Bi-annual inspections of the woodland will be carried out for tree health and public/property safety reasons.

- 4.3 **Countryside and Policy Manager (in lieu of Sustainable Tourism Officer):** No objection. Comments:

- Well sited in terms of services and facilities whilst offering visitors an experience;

- Research informing the South Downs Partnership Management Plan (SDPMP) indicates only 6% of visitors surveyed use accommodation inside the National Park;
 - Provision of tourism accommodation within the SDNP is an income growth opportunity that would accord with Outcome 10 of the SDPMP.
- 4.4 **Dark Night Skies Officer:** No objection, subject to condition. Comments:
- The proposed lighting is very low powered, low level and sensor controlled;
 - The units are located well within the woodland so the internal spill will be shielded; however black out blinds/curtains are recommended;
 - Additional low-level lighting may be required for the entrance steps to the units for reasons of practicality.
- 4.5 **Drainage Engineer:** No objection, subject to condition.
- 4.6 **Easebourne Parish Council:** Support. Comments:
- The application is a significant improvement on the initial application, to which the Parish Council provided a comment of no objection;
 - The development will sit well within the environment, and be of benefit to the local economy.
- 4.7 **Ecology:** No objection, subject to condition.
- 4.8 **Environment Agency:** No objection.
- 4.9 **Environmental Health:** No objection, subject to conditions.
- 4.10 **Flood Authority:** No objection.
- 4.11 **Gardens Trust:** No comment made.
- 4.12 **Highways Authority:** No objection subject to conditions. Comments:
- No objection to the previous proposal;
 - No highway safety concerns, and the amount of car and cycle parking is appropriate;
 - Promotes the use of sustainable transport and a formal Travel Plan Statement would further encourage and advertise sustainable transport modes
- 4.13 **Historic England:** No objection. Comments:
- Lodge Wood is an important element in the Victorian phase of the site as part of the associated formal and woodland gardens of early C19th origin;
 - Re-instatement of historic rides, control of understorey planting and maintenance of the ha-ha wall are benefits of the proposal that should be weighed against any impacts to the historic parkland.
- 4.14 **Natural England:** No objection.
- 4.15 **SDNPA Access:** No objection. Comments:
- Recommend access paths within the site and connecting to Cowdray Farm shop and café and Midhurst to be upgraded to permit use by cyclists and wheelchair users.
- 4.16 **SDNPA Design Officer:** No objection, subject to conditions. Comments:
- Demonstrates a collaborative, landscape-led approach to the design, and the rationale is well-considered and strongly linked to assessment work
 - The treehouses sit harmoniously within the woodland due to rationalisation of support structures and removal of superfluous elements to enhance the above ground feeling and minimise adverse impacts on tree roots and ground stability.
 - The twin gables in High Copse and mono-pitched roofs at Lodge Wood will create pleasing contrasts to the vertical elements and the understorey of the woodland.
 - Refinements of the detailed design relating to the junctions between the external walls and roof and final material palette may be secured via condition.

- 4.17 **SDNPA Historic Buildings:** No objection. Comments:
- Concerns regarding localised or wider listed building settings are now addressed;
 - Impacts to the Registered Garden are now modest and balanced by clear management benefits, particularly to the restoration of former rides, control of understorey planting and maintenance of the ha-ha wall.
- 4.18 **SDNPA Landscape Officer:** No objection, subject to conditions. Comments:
- The scheme has made significant improvements and many negative effects have been designed-out through adherence to the landscape-led approach and thorough understanding of both sites;
 - The scheme delivers well on Purpose 2 and successfully mitigates for any negative effects of the development;
 - In line with Purpose 1, the scheme conserves and in parts enhances; its final success lies with the sensitive management of the sites over the long term.
- 4.19 **Southern Water:** No objection.
- 4.20 **Sussex Gardens Trust:** No objection.
- 4.21 **Tree Officer:** No objection, subject to conditions. Comments:
- Both sites are plantation and amenity woodlands;
 - The submitted tree protection information is in accordance to BS 5837 (2012) and will enable all the appropriate management/mitigation prior and during construction;
 - The amended location of the car parking spaces at High Field Copse away from tree canopies is welcomed. An arboricultural method statement should be secured for this location prior to construction.
- 4.22 **WSCC Fire & Rescue:** No objection, subject to conditions.
- 4.23 **WSCC Public Rights of Way:** No objection. Comments:
- Permitted or dedicated higher access rights on footpaths 1104, 1103, 1108, and 1101_1 would be welcomed and would allow connection to existing bridleway 1099 (The Wharf).

5. Representations

- 5.1 A letter of support has been received from Midhurst Town Council, who see the proposed development as an important addition to the local tourist trade.
- 5.2 A letter of support has also been received from the Midhurst Society, stating that if sensitively executed and managed the development will not damage the environment and may benefit the local economy.

6. Planning Policy Context

- 6.1 Applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. The relevant statutory development plan is the 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 upon the Local Planning Authority to foster the economic and social wellbeing of the local community in pursuit of these purposes.

National Planning Policy Framework (2019) and Circular 2010

- 6.3 The National Planning Policy Framework (NPPF) is considered holistically although the following sections are of particular relevance to the applications:
- Section 2: Achieving sustainable development
 - Section 6: Building a strong, competitive economy
 - Section 12: Achieving well-designed places
 - Section 15: Conserving and enhancing the natural environment
 - Section 16: Conserving and enhancing the historic environment
- 6.4 Government policy relating to National Parks is set out in English National Parks and the Broads: UK Government Vision and Circular 2010 and the revised National Planning Policy Framework (NPPF) issued in 2019. The Circular and NPPF confirm that National Parks have the highest status of protection, and the NPPF states at paragraph 172 that great weight should be given to conserving and enhancing landscape and scenic beauty in national parks and that the conservation and enhancement of wildlife and cultural heritage are also important considerations and should be given great weight in National Parks.
- 6.5 The development plan policies listed in Section 7 have been assessed for their compliance with the NPPF and are considered to be compliant with it.

Major Development

- 6.6 Officers are of the view that the proposal does not constitute major development for the purposes of paragraph 172 of the NPPF (2018), and accompanying footnote 55, advising that 'major development' in designated landscapes is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.

The South Downs National Park Partnership Management Plan 2020-25

- 6.7 The South Downs National Park Partnership Management Plan (SDPMP) (2020-25) is a material consideration in the determination of planning applications, as outlined in national planning practice guidance, and has some weight. It outlines a vision and long term outcomes for the National Park. The following policies are relevant:
- 1: conserve and enhance natural beauty and special qualities of the landscape
 - 3: Protect and enhance tranquillity and dark night skies.
 - 8: Prevent, control and eradicate invasive non-native species
 - 9: The significance of the historic environment is protected from harm
 - 10: Improve the management of heritage assets;
 - 28: Improve and maintain rights of way and access land;
 - 29: Enhance the health and wellbeing of visitors;
 - 30: Raise awareness and understanding about the National Park;
 - 41: Influence visitor behaviour in order to reduce impacts on the special qualities and increase visitor spend;
 - 43: Support the development of appropriate recreation and tourism facilities;
 - 44: Encourage and support tourism providers to develop sustainable business practices;
 - 55: Promote opportunities for diversified economic activity, in particular, where it enhances the special qualities.
- 6.8 Outcome 10 of the SDPMP seeks to secure a “diverse, sustainable, dynamic economy which is positively linked to the special qualities of the National Park; increase awareness and desirability of the South Downs as a special place to visit; [and] establish the South Downs as an exemplar in sustainable tourism.”

Statutory Requirements

- 6.9 The Planning (Listed Buildings and Conservation Areas) Act 1990 places a series of duties on planning authorities when determining applications for planning permission that may affect listed buildings or their setting. 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 building or its setting or any features of special architectural or historic interest which it possesses.'
- 6.10 The Conservation of Habitats and Species Regulations 2017 (as amended) (Habitats Regulations) places a duty on planning authorities when determining applications that may affect international sites to determine the potential for likely significant effects. Where proposals are likely (without mitigation) to have significant effects on international sites, the planning authority is required to undertake an appropriate assessment in order to ascertain that there would not be adverse impacts on the integrity of the international site, and whether the proposal demonstrates that impacts would be avoided or adequately mitigated against.

7. Planning Policy

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

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

- SD1 – Sustainable Development
- SD2 – Ecosystems Services
- SD4 – Landscape Character
- SD5 – Design
- SD7 – Relative Tranquillity
- SD8 – Dark Night Skies
- SD9 – Biodiversity and Geodiversity
- SD10 – International Sites
- SD11 – Trees, Woodland and Hedgerows
- SD12 – Historic Environment
- SD13 – Listed Buildings
- SD16 – Archaeology
- SD17 – Protection of the Water Environment
- SD19 – Transport and Accessibility
- SD20 – Walking, Cycling and Equestrian Routes
- SD22 – Parking Provision
- SD23 – Sustainable Tourism
- SD25 – Development Strategy
- SD34 – Sustaining the Local Economy
- SD48 – Climate Change and Sustainable Use of Resources
- SD49 – Flood Risk Management
- SD50 – Sustainable Drainage Systems

8. Planning Assessment

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

- The principle of providing new tourist accommodation;
- Design, Landscape, and Heritage impacts;
- Impact on trees, ecology and woodland habitat;
- Dark night skies;
- Highways, access and Public Rights of Way (PROW);
- Drainage and the water environment.

Principle of development

- 8.2 Both sites are in a countryside location and part of the designated rural area, where development is generally restricted. Development plan policies and the NPPF reflect the National Park's first and primary Purpose in placing 'great weight' on conserving the landscape and scenic beauty of National Parks, which have the highest status of protection in landscape terms. Policy SD25 exceptionally permits development outside of settlement boundaries where this complies with other relevant Local Plan policies, responds to the context of the relevant broad area, and there is an essential need for a countryside location, which can include the provision of appropriate tourism facilities.
- 8.3 The second purpose of the National Park is to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public, and in many cases proposals for tourist accommodation will accord with this purpose. Tourism is a key economic sector in the National Park, and the findings of the South Downs National Park Visitor Accommodation Review (2014) indicate an overall lack of tourist accommodation across the National Park. The Review also states the wider benefits of supporting tourist accommodation schemes where these improve estate incomes and support wider landscape management. Accordingly, policies SD23 and SD34 seek to encourage rural development that would provide appropriate tourism facilities; and support the rural economy. Proposals should also provide opportunities for visitors to increase their awareness, understanding and enjoyment of the SDNP's special qualities; minimise the need for travel by private car and encourage access by sustainable means; and not detract from the experience of visitors. Although the Review did not identify a lack of tourist accommodation within Midhurst town, it indicated a shortage of accommodation in Petersfield, and scope for boutique hotels in Petersfield and Midhurst.
- 8.4 The application sets out in detail how the proposal would contribute to the National Park's special qualities, and provide clear tourism benefits that align with Purpose 2 in terms of providing high quality, year round accommodation (including accessible units in each site) that would improve the rate of overnight stay and could allow visitors to experience the special qualities of the National Park. The scheme would provide benefits to the rural economy, including links with local businesses such as the Cowdray Farm Shop, and local employment. The development could also attract visitors to the area as a destination and experience of both the Cowdray Estate and wider National Park in its own right.
- 8.5 The principle of providing tourist accommodation is broadly supported by policy, and when determining the previous application, Members were supportive in principle for a development of this type in the location. However for any tourism scheme to be acceptable it must accord with the National Park's First Purpose. For this scheme in particular it was also necessary to overcome Members' previous concerns in regard to impacts on the historical parkland character and ongoing woodland management.
- 8.6 Whilst it is inherently difficult for development of this nature to enhance the character of uninhabited woodland, officers consider that the scheme has followed a landscape-led process to carefully address the previous concerns raised by Members, and has responded to landscape evidence with bespoke design and woodland management approaches that succeed overall in conserving and enhancing the natural beauty, wildlife and cultural heritage of the selected woodland sites. The proposal is therefore considered to accord with both National Park purposes, and is acceptable in principle. Further consideration of Purpose 1 policies relating to landscape, design and heritage is made below.

Design, Landscape, and Heritage Impact

- 8.7 Development proposals must comply with policies SD4, SD5, SD6 and SD7, which require the design of development to adopt a landscape-led approach in order to conserve and enhance existing landscape features which contribute to the distinctive character, pattern and evolution of the landscape; integrate with, respect and sympathetically complement the landscape character and appearance of the area; and safeguard tranquillity. Policies SD12 and SD23 support proposals that conserve and enhance the historic environment, do not detract from the experience of visitors, or adversely affect the character, historical significance, appearance or amenity of the area.

- 8.8 This application seeks to address the concerns raised previously by officers, and the reasons for refusal attached to the previous decision for SDNP/18/00643/FUL (see committee report and meeting minutes appended at **Appendices 2 and 3**).
- 8.9 Prior to making the application, the applicant undertook a Planning Performance Agreement (PPA) process which was notably 'front loaded' by a high level study of 21 possible woodland sites within the Cowdray Estate which refined five potential development sites. Site visits with Officers were carried out to all five sites, and the two sites selected were agreed as being the least impactful in landscape terms, as well as meeting amenity and operational requirements. Over four workshops, the applicant's landscape and design team gathered and analysed a broad range of landscape evidence including constraints and opportunities; time depth; landform, road and settlement patterns; woodland character; and perceptual qualities.
- 8.10 This information was explored with officers to iteratively inform a vision and key design principles for each individual site, and address the concerns previously raised. This baseline evidence was used to identify a number of key opportunities for heritage, biodiversity and ecosystem services; access and parking solutions; experience of dark skies; and sustainable woodland management strategies. At Lodge Wood this includes the restoration of historic rides (clearings) and haha (hidden ditch). At Highfield Copse this includes the restoration of the historic track and sandstone wall and a building design with industrial details to reflect the origins of Benbow Pond. Effort was also made to understand the intrinsic landscape qualities of each site, including tranquillity and the 'feel' of the woodland, which is subtly different in both cases. Enhancement of each site would be achieved through bringing both woodlands back into active management through site-specific Landscape & Ecological Management Plans (LEMPs), which have been submitted with the application.
- 8.11 The Landscape, Design and Historic Buildings officers have no objections to the scheme, and agree that the applicants have worked hard to integrate positive interpretation and experiences based upon the National Park's Special Qualities and each site's unique landscape character. The development would not adversely impact on the Grade II listed historic parkland or the setting of the Grade II listed Cowdray House. It is considered appropriate to secure final design details and monitoring over a period of 10 years built into the LEMPs via suitably worded conditions.
- 8.12 In summary, the scheme is considered to be fully landscape-led and would conserve and enhance both woodland sites in accordance with relevant statutory heritage considerations, development plan policies and the National Park's First Purpose.

Impact on Trees, Ecology and Woodland Habitat

- 8.13 Policies SD9 and SD11 support proposals that conserve and enhance biodiversity and supporting habitat, and trees, hedgerows and woodlands. SD2 supports proposals that protect and provide more, better and joined up natural habitats. Policy SD10 states that proposals on greenfield sites within the The Mens, Ebernoe Common and Singleton & Cocking Tunnels Special Areas of Conservation (SACs) buffers must safeguard bats and their commuting and foraging habitat.
- 8.14 The application is supported by Ecological Surveys, a Tree Survey, Arboricultural Impact Assessment & Method Statement, and a Landscape & Ecology Management Plan (LEMP) for each site. Together these set out the proposed Woodland Management of each site, following a Woodland Condition survey at Lodge Wood and historic forestry practices at High Copse Wood, and how both sites will be managed to increase their ecological value. The development would bring both woodlands under active management, and secure their long-term future as priority habitat. The management proposed, which includes removal of invasive rhododendron, tree planting and under storey planting of native species, would also enhance biodiversity and habitat functionality to provide habitat net gain and support a wide range of protected and woodland species including roosting and hibernating bats and badgers, birds, invertebrates and fungi. Further information has also been provided in regard to the location of badger setts and bat roosts in both sites.
- 8.15 The trees works identified as currently required are due to the current condition of the woodland and not as a consequence of the scheme proposals. Where possible standing

dead wood would be managed as monolith habitat features. Whilst there would be an increase in human activity within the woodlands in close proximity to trees, and an ongoing requirement for deadwood removal for health and safety purposes this would be relatively minimal due to the modest scale of the development proposed. The methodology for pile installation within root protection areas, and hand digging of service routes would be carried out under arboricultural supervision.

- 8.16 The County Ecologist has no objection to the proposals subject to conditions securing the measures set out in the submitted LEMPs. Given the location of both sites within the buffer zones of The Mens, Ebernoe Common, and Singleton & Cocking Tunnels Special Areas of Conservation (SACs), the application has been assessed under the Habitats Regulations in regard to adverse impacts on the integrity of the international sites, and whether the proposal demonstrates that impacts may be avoided or adequately mitigated against. The Habitats Regulations Assessment (HRA) concludes that the proposal would not have an adverse effect on the integrity of the international sites on the basis of the avoidance and mitigation measures outlined. In order to ensure that there would be no harm to bats and other protected species, it is considered appropriate to secure the measures set out in the submitted Landscape and Ecological Management Plan, and an external lighting plan designed to minimise impacts on wildlife.
- 8.17 The Tree Officer has no objection to the proposals subject to a condition securing the Tree Survey, Arboricultural Impact Assessment & Method Statement. The southern row of car parking spaces at High Field Copse have been moved eastwards to avoid tree canopies, and an arboricultural method statement for this part of the site may be secured via an appropriately worded condition.
- 8.18 In summary, it is considered that the scheme would conserve and enhance biodiversity and primary woodland habitat in accordance with development plan policies and the National Park's First Purpose.

Sustainable construction

- 8.19 Policies SD2 and SD48 require development proposals to sustainably manage natural resources and incorporate sustainable design features.
- 8.20 The submitted application states that all timber used for construction will be Programme for the Endorsement of Forest Certification (PEFC) or Forest Stewardship Council (FSC) certified, 80% of which would be sourced locally, with all cladding materials sourced within a 20km radius of the site. The units would be super insulated and equipped with triple glazing and technologies to minimise carbon and energy use. The units would be heated via air source heat pumps, and capture at source solutions including rainwater collection for washing boots etc. Electrical charging points would be provided in both car parks.
- 8.21 It is considered appropriate to secure final details of sustainable construction via a suitably worded condition.

Dark night skies

- 8.22 Policy SD8 requires development to conserve and enhance the intrinsic quality of dark night skies and the integrity of the Dark Sky Core. The site falls within zone EI(a), or 'intrinsic rural darkness,' which is classified as 'dark sky' and includes isolated areas that may not be connected to the main core.
- 8.23 The submitted information states that there would be two minimal low-level, sensory timed timber bollard lights in both car parks, and either side of the entrances to both sites for wayfinding purposes. Visitors would be provided with a torch/ lantern for the duration of their visit to provide safe access from the car park to the accommodation. Each unit would be fitted internally with heavy black out curtains to the windows and doors and provided with educational material to avoid light spill.
- 8.24 The Dark Night Skies officer has advised that light spill would likely be shielded by the woodland, however supports the use of black out curtains to enhance the dark skies experience for visitors. Whilst the lack of any other external lighting is commended, and

some risk would be accepted by visitors if the site is expected to be dark, there may be a health and safety requirement to provide sensory timed lighting on the units' steps.

- 8.25 It is considered appropriate to secure final details of external lighting via a suitably worded condition.

Highways, Access and PROW

- 8.26 The application is supported by a Transport Statement setting out that each stay is anticipated to be four nights maximum with designated 'change over' days on Fridays and Mondays with arrival and departure times set outside peak hours. Visitors to High Field Copse would first arrive at the farm shop site to obtain keys and information. Once on site, most trips by visitors are anticipated to be via sustainable means (walking and cycling.)
- 8.27 The application is also supported by a Travel Plan setting out the sustainable modes of transport which can be utilised from both sites including bus route and the public right of way network. The all-weather access routes from the car park would be pedestrian/cycle and access friendly, with buggies provided for visitors with luggage.
- 8.28 WSCC Highway Authority is satisfied with the parking provision and access arrangements, and has no objection to the proposal subject to conditions to secure car and cycle parking, and a more detailed, formal transport statement to embed the use of sustainable transport modes once the development is brought into use.
- 8.29 Both the SDNPA Access and WSCC PROW officers have recommended that footpaths 1104 and 1109 to Cowdray Farm shop and café and the centre of Midhurst be upgraded to shared-use for cyclists and wheelchair users. The submission also suggests that a Cowdray heritage feature trail could be created to enhance visitors' sense of being within the Cowdray estate and historic parkland, and SDNP. Officers do not consider that the acceptability of the proposal is dependent on the ability to secure these PROW upgrades, or that it would be proportionate to do so given the relatively small scale of development proposed; however both these matters are being progressed with the Estate separately.

Drainage and the Water Environment

- 8.30 Policies SD17 and SD50 seek to protect the water environment and prevent increase of surface water run-off, taking account of climate change.
- 8.31 The submitted information sets out that water butts and permeable surfacing for new paths would control the surface water run-off.
- 8.32 The WSCC Lead Local Flood Authority (LLFA) and Drainage Engineer have no objection to the proposals. Both sites are at low risk of ground and surface water flooding, and the proposed surface water drainage strategy is acceptable in principle. Foul drainage arrangements would be subject to Building Control approval and may require a permit from the Environment Agency.
- 8.33 It is considered appropriate to secure details of the surface water drainage arrangements via a suitably worded condition.

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 indicate that permission should not be granted. It is therefore recommended that planning permission be approved.

10. Reason for Recommendation and Conditions

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

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.
3. The residential accommodation hereby approved shall be occupied as holiday accommodation managed in accordance with the following:
 - i) The accommodation shall be managed, supervised and occupied for holiday and short-term let purposes only;
 - ii) The accommodation shall not be occupied as a person's sole, or main place of residence;
 - iii) The accommodation shall not be occupied by any one person for a period exceeding 28 days in any calendar year;
 - iv) The owners/operators shall maintain an up-to-date register of the names of all owners/occupiers of the accommodation on the site, and of their main home addresses, and shall make this information available to the Local Planning Authority upon request.Reason: To maintain the availability of the site as short term holiday tourist accommodation.
4. There shall be no amplified or percussive music of any form played anywhere within the site.
Reason: To protect the amenity of occupants of the site and residents in the locality from noise disturbance.
5. Prior to the first use of the development hereby permitted, a Site Management Plan for the site shall be submitted to and approved in writing by the Local Planning Authority. The Plan shall include, but not be limited to, details of:
 - i) All patrons to sign up to site rules through terms and conditions;
 - ii) No amplified music permitted at any time;
 - iii) The need to keep to public footpaths;
 - iv) Dogs policy i.e. if allowed on site to be kept on leads and all dog fouling cleared promptly;
 - v) Fire and barbecue rules;
 - vi) A complaints procedure in place, including management contact details to be displayed prominently at the site and on the website. All complaints and actions must be logged and made available to the Local Planning Authority on request.
 - vii) Waste disposal.Thereafter the development shall be undertaken in full accordance with the agreed details unless otherwise agreed in writing by the Local Planning Authority.
Reason: In the interest of amenity and to enable the Local Planning Authority to regulate and control the development and use of land.
6. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (or any Order revoking and re-enacting that Order with or without modification) no buildings, structures or works as defined within Part I of Schedule 2, classes A-G or any order revoking or re-enacting that Order shall be erected or undertaken on the site.
Reason: To enable the Local Planning Authority to regulate and control the development of land in the interests of the character and appearance of the development and area.

Construction

7. Prior to the commencement of the development hereby permitted, a Construction Management Plan shall be 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 necessarily be restricted to the following matters:

- i) An indicative programme for carrying out the works;
- ii) The anticipated number, frequency and types of vehicles used during construction;
- iii) The method of access and routing of vehicles during construction;
- iv) The parking of vehicles by site operatives and visitors;
- v) The loading and unloading of plant, materials and waste;
- vi) The storage of plant and materials used in construction of the development;
- vii) The erection and maintenance of security hoarding;
- viii) No burning of construction materials on site;
- ix) 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 where necessary);
- x) Measures to minimise the noise (including vibration) generated by the demolition/construction process to include hours of work, proposed method should foundation piling occur, the careful selection of plant and machinery and use of noise mitigation barriers;
- xi) No work to be undertaken on the site except between the hours of 08:00 and 18:00 on Mondays to Fridays inclusive and 08:00 hours and 13:00 hours on Saturdays, and no work to be undertaken on Sundays, Bank and Public Holidays;
- xii) Details of any flood lighting, including location, height, type and direction;
- xiii) Measures to control the emission of dust and dirt during demolition/construction;
- xiv) A scheme for recycling/disposing of waste resulting from demolition and construction works;
- xv) A method to record the quantity of recovered material (re-used on site or off site);
- xvi) Details of public engagement both prior to and during the construction works.

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

8. Prior to the commencement of the development hereby permitted, a Written Scheme of Investigation to secure an Archaeological Watching Brief during the relevant stages of groundworks including the excavation of new pathways, car parking areas and service trenches shall be submitted to and approved in writing by the Local Planning authority. Thereafter the provisions of the scheme shall be carried out in full accordance with the approved programme.

Reason: To assess the extent, nature and date of any archaeological deposits that might be present and the impact of the development upon these heritage assets.

9. Prior to the commencement of the development hereby permitted, the full details of the proposed surface water drainage scheme shall be submitted to and approved in writing by the Local Planning Authority. The design shall follow the hierarchy of preference for different types of surface water drainage disposal systems, as set out in Approved Document H of the Building Regulations and the SuDS Manual produced by CIRIA.

No building shall be occupied until the complete surface water drainage system serving the development has been implemented in accordance with the agreed details.

Reason: To ensure satisfactory provision of surface water drainage.

10. Prior to the commencement of the development hereby permitted, details showing the proposed location at Lodge Wood and High Field Copse of 1 No fire hydrant or stored water supply (in accordance with the West Sussex Fire and Rescue Guidance Notes)

shall be submitted to and approved in writing by the Local Planning Authority in consultation with West Sussex County Council's Fire and Rescue Services.

Prior to the first use of the development, the hydrant shall be installed in the approved location[s] to BS 750 standards or stored water supply and connected to an appropriate water supply in terms of both pressure and volume for the purposes of firefighting. The fire hydrant shall thereafter be maintained as part of the development by the owner / occupier if the installation is retained as a private network.

Reason: In the interests of amenity and in accordance with The Fire & Rescue Safety Act 2004.

Design and Materials

11. Prior to the commencement of the development hereby permitted, a schedule of architectural details, materials and finishes (including rainwater goods) and, where so required by the Local Planning Authority, samples of such materials and finishes, shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be carried out in full accordance with the approved schedule and samples.

Reason: To enable the Local Planning Authority to control the development in detail in the interests of the character and appearance of the area and the quality of the development.

12. Prior to the commencement of the development hereby permitted, a detailed scheme of hard and soft landscaping works (both associated with the development and the Landscape and Ecological Management Plans required under Condition 15) 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) Retained areas of grassland cover, scrub, hedgerow, and trees;
 - ii) 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;
 - iii) Tree guards, staking and tree-pit construction;
 - iv) Location, height and materials/construction technique for all boundary treatments and other built means of enclosure;
 - v) Treatment of surfaces, paths, access ways and parking areas, including their appearance, depth and permeability;
 - vi) Above ground rainwater harvesting solutions;
 - vii) Ancillary structures (including cycle and refuse storage) and landscaping treatment associated with sewerage treatment/locations;
 - viii) Electric vehicle charging points;
 - ix) A timetable for implementation of the soft and hard landscaping works.
 - x) 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.

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

Reason: To achieve an appropriate landscaping scheme in the interests of amenity and landscape character.

13. No development above slab level shall commence until a design stage construction report (in the form of design stage SAP data; a BRE water calculator; product specifications; and building design details, layout or landscape plans), has been submitted to, and approved in writing, by the Local Planning Authority. The report shall demonstrate that:

- i) Each unit has reduced predicted CO₂ emissions by at least 19% due to energy efficiency and a further 20% due to on site renewable energy compared with the maximum allowed by building regulations;
- ii) Predicted water consumption no more than 110 litres/person/day;
- iii) Evidence demonstrating sustainable drainage and adaptation to climate change;
- iv) Timber will be Grown in Britain or FSC certified and locally sourced where feasible.

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

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

14. Prior to the first use of the dwellings, hereby permitted, a refuse storage and management strategy, incorporating collection for recyclables and measures to prevent wildlife from coming into contact with waste items, shall be submitted to and approved, in writing, by the Local Planning Authority. Thereafter the development shall be undertaken in full accordance with the agreed strategy unless otherwise agreed in writing by the Local Planning Authority.

Reason: To safeguard against an unacceptable impact upon amenity and wildlife.

Ecology and Trees

15. Prior to the commencement of the development hereby permitted, a Landscape and Ecological Management Plan (LEMP) for Lodge Wood and High Field Copse shall be submitted to and approved in writing by the Local Planning Authority. The LEMPs shall incorporate the measures detailed within the submitted Landscape and Ecology Management Plan (Huskisson Brown & Surface Property Ltd, April 2020) and include:
- i) A description, plan and evaluation of landscape and ecological features to be managed;
 - ii) Ecological trends and constraints on site that might influence management;
 - iii) Long-term aims and objectives of management;
 - iv) Appropriate management options for achieving aims and objectives;
 - v) Prescriptions for management actions, together with a plan of management compartments;
 - vi) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a 10-year period);
 - vii) Details of the persons, body or organisation responsible for implementation of the plan;
 - viii) A scheme of ongoing monitoring over a 10 year period, to ensure management is generating the desired outcomes and remedial measures (within the 10 year monitoring period) incorporated where appropriate, including a mechanism to discharge the monitoring by the Local Planning Authority;
 - ix) Details of any legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer in partnership with any management body(ies) responsible for its delivery.

The approved LEMPs shall be implemented in accordance with the approved details and 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 LEMPs are not being met.

Reason: To ensure appropriate on-going management of the land beyond the completion of the development, to ensure fully functioning landscape and biodiversity objectives of the originally approved scheme, and in order to preserve and enhance biodiversity and landscape features within the subject sites in accordance with the National Planning Policy Framework and to meet the purposes of the South Downs National Park.

16. Works shall be carried out in full accordance with the tree protection measures as set out in the approved Arboricultural Impact Assessment & Method Statements (Alpress, April 2020).

Reason: In the interests of the amenity of the local area and to accord with British Standard BS5837 Trees in Relation to Construction (2012).

17. Prior to development above slab level, an Arboricultural Impact Assessment & Method Statement relating to the car parking area at High Field Copse shall be submitted to and approved in writing by the Local Planning Authority.

Reason: In the interests of the amenity of the local area and to accord with British Standard BS5837 Trees in Relation to Construction (2012).

Lighting and Dark Night Skies

18. Prior to development above slab level, a scheme of external lighting for Lodge Wood and High Field Copse 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.

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.

19. Prior to first occupation of the development hereby permitted, details of blackout curtain or automated black-out blinds to be affixed to glazing in the units shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be carried out and retained 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.

Access and Parking

20. Prior to the first use of the development hereby permitted, details of the car parking and electric vehicle charging points shall be provided for both sites. Thereafter the development shall be carried out in full accordance with the approved details and the spaces shall thereafter be retained at all times for their designated purpose.

Reason: To provide car-parking space for the use.

21. Prior to the first use of the development hereby permitted, details of covered and secure cycle parking spaces shall be provided for both sites. Thereafter the development shall be carried out in full accordance with the approved details.

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

22. Prior to the first use of the development hereby permitted, a Travel Plan Statement shall be submitted to and approved in writing by the Local Planning Authority. The Travel Plan Statement shall be in accordance with the latest guidance and good practice documentation as published by the Department for Transport or as advised by the Highway Authority. The Travel Plan shall include but not be limited to:
- i) Detail of measures proposed to encourage use of public transport, walking, cycling and electric vehicle use;
 - ii) Detail of staff car sharing and other measures;
 - iii) Targets for visitors behaviour and travel;
 - iv) Discount from cycle shops local businesses;
 - v) Information to be provided at time of booking and during orientation;
 - vi) Details of visitor surveys to monitor transport models.

Thereafter the approved Travel Plan shall be carried out and retained in full accordance with the approved details for the duration of the development unless otherwise approved in writing by the Local Planning Authority.

Reason: To encourage and promote sustainable transport.

Informatives

- 1) Please note that this development may require an environmental permit, a variation of an existing permit or an exception from an environmental permit from the Environment Agency. Further information can be found on the gov.uk website – <https://www.gov.uk/topic/environmental-management/environmental-permits> <https://www.gov.uk/guidance/discharges-to-surface-water-and-groundwaterenvironmental-permits> The Applicant must ensure that the operations at the site are in accordance with the Environmental Permitting (England and Wales) Regulations 2016. The Applicant is advised to contact the National Customer Contact Centre on 03708 506 506 (Monday to Friday 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk
- 2) The applicant is encouraged to continue working with SDNPA rangers after the 10 year formal monitoring period for the LEMPs has come to an end.
- 3) The proposed development referred to in this planning permission is a chargeable development liable to pay Community Infrastructure Levy (CIL) under Part 11 of the Planning Act 2008 and the CIL Regulations (as amended). In accordance with CIL Regulation 65, the South Downs National Park Authority will issue a Liability Notice in respect of the chargeable development referred to in this planning permission as soon as practicable after the day on which planning permission first permits development. Further details on the Authority's CIL process can be found on the South Downs National Park Authority website: <https://www.southdowns.gov.uk/planning/community-infrastructure-levy/>

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: Stella New

Tel: 01730 819216

email: stella.new@southdowns.gov.uk

Appendices

1. Site Location Map
2. Committee Report for SDNP/1800643/FUL
3. Minutes of 11 October 2018 Planning Committee Meeting

SDNPA Consultees Legal Services, Development Manager.

Background Documents [All planning application plans, supporting documents, consultation and third party responses](#)

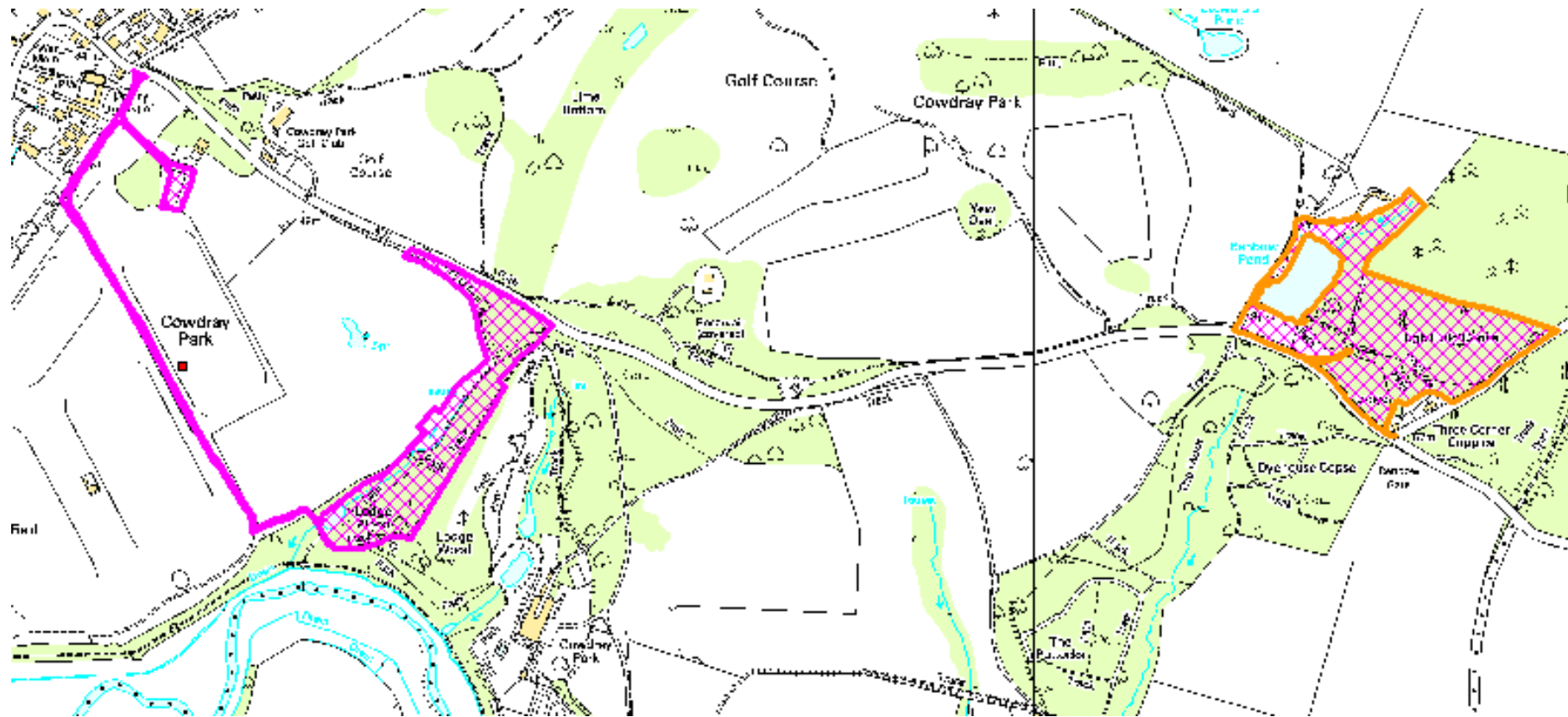
[National Planning Policy Framework \(2019\)](#)

[South Downs Local Plan \(2017-33\)](#)

[South Downs National Park Partnership Management Plan 2020-25](#)

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

Site Location Map



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